

# WHISTLEBLOWING POLICY & GUIDE

## Our purpose. Our responsibility

At RPS, our purpose (why we exist) is to 'create shared value by solving problems that matter to a complex, urbanising and resource scarce world'. Our purpose reflects our commitment to creating shared value for our people, investors, clients, and communities and compels us to align our words and actions to how we behave.

We set high standards for ourselves and our commitment to upholding those standards is clear. Under no circumstances is it acceptable, nor is it ever expected, to compromise our policies or standards.

## Introduction

As a responsible business it is important that RPS provides employees and associates a mechanism to voice concerns about standards at RPS. Should you discover information or observe behaviour which you believe shows **serious malpractice or wrongdoing** within the organisation you are required to report it. This is called 'whistleblowing'. The Company has set up an independent Whistleblowing hot line with EthicsPoint where you can anonymously and confidentially report your concerns, either online or through a toll-free telephone line.

This policy and guide has been prepared to help an employee or associate of RPS raise a concern and disclose information which the individual believes shows malpractice or impropriety. It is intended to cover concerns which are in the public interest and may at least initially be investigated separately. This then may lead to the invocation of other procedures.

## What is Whistleblowing?

- Whistleblowing is when an employee provides certain types of information which has come to their attention, usually to the employer or a regulator, to raise a concern about danger or illegality that affects others.
- The disclosure may be about the alleged wrongful conduct of the employer, a colleague, client, or any third party.
- Typically, the whistle-blower is not directly, or personally affected by the danger or illegality, although they may be.

## When to make a report

You can raise your concern at any time about an incident that has happened in the past, is happening now, or you believe will happen soon.

## How to report a concern as an employee of RPS

1. In the first instance we encourage you to speak to your line manager, who will work with you on the appropriate course of action if that is not possible then speak with your line managers manager, failing that then please speak to your HR Director who will guide you from there.
2. If you feel that speaking up internally is not an option, you can use our whistleblowing platform – EthicsPoint. EthicsPoint is somewhere you can anonymously and confidentially report concerns, either via a 24/7 global toll-free telephone service or online. Details available here at [rpsgroup.ethicspoint.com](https://rpsgroup.ethicspoint.com).
  - You will be given the option of either filing your report anonymously or disclosing who you are.
  - You can then either file a written report by completing the required details on the portal, or via a telephone call to an experienced call handler.

- Once your report has been completed, you will be assigned with a unique code called a report key which you should write down and keep safe. You will also need to create a password. These are needed so you can check your report for feedback and answer any questions that may require clarification to help investigate your concerns.

## What should I be reporting?

Concerns that are in the public interest and relate to the following areas can be reported on the EthicsPoint hotline. i.e.:

- Criminal offences, risk to health and safety, environmental damage, failure to comply with a legal obligation, financial malpractice, miscarriage of justice, reporting harassment and discrimination that is hard to report via other internal processes.

## What should this hotline not be used for?

- Making a complaint. If you have a complaint relating to the quality of RPS services, please use your usual channels.
- A personal grievance. Where possible, these should be reported under your local country grievance policy after a conversation has been held with your local HR business partner.
- A fundamental term of every contract of employment is that an employee will not disclose confidential information about RPS.

## Protection

A report can be made without fear of reprisal provided the report is made:

- in good faith
- in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety. In an extreme case, malicious or wild allegations could give rise to legal action on the part of the person(s) complained about.

Across our jurisdictions, there is legal protection to employees against being dismissed or penalised by their employers because of publicly disclosing certain serious concerns. RPS has endorsed the provisions set out below to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.<sup>1</sup>

## What happens once you file a report with EthicsPoint

Once you have filed a report with EthicsPoint, it will be sent to the RPS Board Audit Committee who will nominate an investigating officer. This is typically a senior manager or external party (depending on the sensitivity of the claim) to investigate.

When investigating the claim, the investigating officer should:

- Be provided with a full copy of the whistleblowing report.
- Confirm with you within 5-6 days via EthicsPoint that your complaint has been received and is being investigated, although it may not be possible to lay down precise timescales for such investigations. If you have made the complaint and made known your identity, then the investigator will communicate with you direct.
- The investigating officer should inform the employee against whom a complaint has been made as soon as is practically possible and they will be informed of their rights to have a colleague attend (or legal representative if so required) any interviews or hearings held under the provision of these procedures.
- The investigating officer should consult with the Audit Committee, whether to involve the Company's auditors, lawyers, or the police, in investigating the complaint.

- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals or bodies.
- At all times, the investigating officer will keep the Audit Committee apprised of the investigation and will submit a report on the validity of the complaint with a recommendation of his judgement.
- The investigator will also seek to keep you updated by filing updates, or questions, where further clarification is required, on the EthicsPoint website, which the employee will be able to review by entering their password and “report key”.
- Furthermore, any findings that the investigation uncovers, or the results of the investigation will be passed back to EthicsPoint which will be logged against the complaint and you will be able to access this information by logging on to the site and entering your password and “report key”.
- If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but you are not satisfied with the outcome of the investigation, RPS recognises your right to make disclosures to other relevant external parties (e.g. the Health and Safety Executive).

## Confidentiality

By working with EthicsPoint this ensures confidentiality to anyone filing a report, and anonymity to anyone wishing to remain anonymous.

However, you should be aware, that to allow a robust investigation into the matter you have raised, it may be necessary to share with others the essence of your report. This means your identity may become apparent.

## Questions?

For more information go to the [EthicsPoint FAQs](#)



Dave Gormley  
Company Secretary  
November 2020

### 1. Whistleblower Legal Protections

- Australia – Corporations Act, 2001
- NZ – Protected Disclosures Act, 2000
- South Korea – Act on Anti-Corruption
- Malaysia – Whistleblower Protection Act, 2010
- Singapore – Prevention of Corruption Act; Workplace Safety and Health Act
- Netherlands – Whistleblowers Authority Act
- UK – Public Interest Disclosure Act, 1998
- US – Sarbanes-Oxley Act, 2002; Occupational Safety & Health Act, 1970
- Canada – Canadian Criminal Code 425.1
- Norway – Norwegian Working Environment Act