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# **Rex Group**

## **Whistleblower Policy**

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## 1. Purpose

The Rex Group (Group) is committed to conducting its business activities ethically and with integrity. We understand that this is crucial to our continued success and reputation. Our shared values and policies guide our everyday conduct. Rex's Code of Conduct makes it a responsibility for all stakeholders to speak up and report unethical/unlawful/wrongful behaviour. The Group's Whistleblower Policy (this Policy) is an important element in detecting corrupt, illegal or other undesirable conduct.

The purpose of this Policy is to outline how to raise concerns about Reportable Conduct, and to ensure that people who raise such concerns can do so safely, securely and with confidence that they will be protected and supported. It is also to provide transparency around the Group's framework for receiving, handling and investigating concerns regarding Reportable Conduct. The Group includes:

- a) Regional Express Holdings Pty Ltd (Administrators Appointed);
- b) Australian Airline Pilot Academy Pty Ltd;
- c) AAPA Victoria Pty Ltd;
- d) Australian Aero Propeller Maintenance Pty Ltd;
- e) Any other entity that is added to the Group from time to time.

References in this Policy to employees and officers include employees and officers of the Group.

## 2. Who can be a 'Whistleblower' under this Policy?

A range of people can raise a concern under this Policy as a 'Whistleblower', and the terms of this Policy will apply to them, if they are a current or former:

- a) employee of the Group;
- b) officer (including a director) of the Group;
- c) contractor, or an employee of a contractor, who has supplied services or goods to the Group or its service companies, whether paid or unpaid;
- d) associate of the Group, which may be a person with whom the Group acts in concert; or
- e) spouse, relative or dependent of any of the people listed above.

While you must hold or have held one of these roles to access the protections, you do not have to identify yourself or your role, and you can raise your concerns anonymously.

## 3. What can be reported?

- 3.1. You are encouraged to report any matters that you have reasonable grounds to believe or suspect, amounts to misconduct, or an improper state of affairs or circumstances, in connection with the Group, including any Reportable Conduct.

**Reportable Conduct** means any conduct in relation to The Group which:

- a) is fraudulent or corrupt, including bribery money laundering or misappropriation of funds;

- b) is illegal activity (such as theft, violence, criminal damage to property). Conduct mentioned in (a) could also be illegal;
- c) is unethical (such as dishonestly altering Group records or data, adopting non-standard or unjustified accounting practices or serious misconduct);
- d) is potentially damaging to the Group, a worker or third party, such as environmental damage, or serious abuse of the Group's property or resources;
- e) may cause financial loss to the Group or damage its reputation or be otherwise detrimental to its interests;
- f) constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;
- g) represents a danger to the public or the financial system; or
- h) involves any other kind of serious misconduct or an improper state of affairs or circumstances (including, for example, the existence of a serious conflict of interest between the Group's affairs and an individual's personal interests, or the exercise of corporate authority for personal ends).

3.2. You could also report a conduct in which you are partially involved. Where this occurs, the principle of Just Culture will be applied.

#### 4. What matters should not be reported under this Policy?

4.1. Reportable Conduct does not include personal work-related grievances, which should instead be raised as per the grievance procedure or other relevant policies to allow those issues to be resolved most effectively. Personal work-related grievances are grievances relating to a person's current or former employment or engagement that have implications for them personally (that is, they relate solely to them), and do not fall within the scope of Reportable Conduct. For example, a personal work-related grievance would include a grievance regarding:

- a) an interpersonal conflict between you and another employee;
- b) a decision about your engagement, a transfer or a promotion;
- c) a decision about your terms and conditions of employment. For example, being unhappy about a pay review; or
- d) a decision to suspend or terminate your employment, or otherwise discipline you where appropriate.

4.2. You must not make a report that you know, or ought to know, is false or has no substance, i.e. lacks a basis in reality or grounded in fact. Where it is found that a person has knowingly and maliciously made a false report, this will be considered serious misconduct and may result in disciplinary action, up to and including termination.


4.3. If you wish to raise a concern about Reportable Conduct that is related to any work, or proposed work, for a client of Rex, you should first contact the independent whistleblower hotline or a

Whistleblower Officer (WO) to confirm that reporting your concern to the Whistleblower Hotline does not breach your duty of confidentiality.

## 5. How reportable conduct can be reported

5.1. For the purposes of this policy and to ensure appropriate escalation and timely investigation, reports can be made the following ways:

- a) A report may be made to Rex's external independent whistleblowing service **Core Integrity** via the below reporting channels.

Reporting Channels	
Shortened URL	<a href="https://ispeakup.co/rex">https://ispeakup.co/rex</a>
QR Code	
Phone	1800 133 495
Address	P.O. Box 730, Milsons Point, NSW 1565
Email	<a href="mailto:speakup@coreintegrity.com.au">speakup@coreintegrity.com.au</a>

- b) A report to Core Integrity may be made anonymously, if desired. However, this may impact Rex's ability to investigate the matters reported. All reports made through Core Integrity will be received by a WO for initial assessment, and, where deemed to be concerned with matters that may constitute reportable conduct, may be referred for subsequent investigation or other appropriate action.
- c) Any disclosures received via the Whistleblower Hotline will be referred to a Rex WO, unless disclosure implicates a WO, in which case they will be referred to the other. If both are implicated, the disclosure will be referred to the Chief Executive Officer.

### *Report to a WO*

5.2. If a Whistleblower does not wish to make a Report to Core Integrity, a report can be made directly to a WO.

### Report to an Eligible Recipient

- 5.3. If a Whistleblower does not wish to make a report to the independent whistleblowing service or a WO, a report can be made to an Eligible Recipient. Eligible Recipients of Rex are Officers, Directors and nominated Senior Managers of Rex.

#### *Other Protected Disclosures*

- 5.4. A report made by a Whistleblower to any of the following recipients can also qualify for protection under the Corporations Act 2001:
- a) registered tax agents, an external auditor, or a member of an external audit team conducting an audit on Rex;
  - b) a legal practitioner for the purpose of obtaining legal advice or representation on the operation of the whistleblower provisions; or
  - c) regulatory bodies and other Commonwealth authorities specified in regulations (such as the Australian Securities and Investments Commission (ASIC) or other commonwealth body prescribed under the regulations.

### 6. Emergency and public interest disclosures

For Emergency Disclosure and Public Interest Disclosures, you may also report Reportable Conduct to journalists and members of the Commonwealth, state or territory parliaments. You should contact Rex's WO or an independent legal advisor to ensure you understand the criteria for making an emergency or public interest disclosure.

### 7. Key information to include in a report 'disclosure'

Reports are most useful when they include key information that offers actionable insight. Disclosures should include as much of the following information as possible if known by the person making the disclosure. When making a disclosure you should:

- a) State what has occurred;
- b) Describe how the misconduct arose;
- c) Describe where it occurred;
- d) State when the misconduct occurred;
- e) Inform who was involved;
- f) Provide any material to support your concerns, such as documents;
- g) Outline if you have reported the matter elsewhere; and
- h) State what protections you may need following making this report and/or other concerns you may have.

### 8. Confidentiality

- 8.1. The Group's priority is to support and protect people who raise concerns about Reportable Conduct. If you are a Whistleblower and you raise a concern regarding Reportable Conduct, your identity (and any information that the Group has because of your report which someone could likely use to identify you) will only be disclosed if:

- a) you give your consent;
- b) the disclosure is allowed or required by law (for example, disclosure by the Group to obtain legal advice on the law relating to whistleblowing); or
- c) in the case of information likely to identify you, it is reasonably necessary to disclose the information for the purposes of an investigation, but your identity is not disclosed and all reasonable steps are taken by The Group to prevent someone from identifying you.

8.2. To maintain confidentiality of a report, the Group will:

- a) limit access to information relating to your report;
- b) carefully review and potentially de-identify certain aspects of your report as appropriate.

8.3. Consent to the limited sharing within the Group of your identity will assist the Group to protect and support you in relation to your disclosure and facilitate investigating, reporting and taking action arising as a result of your disclosure. Please be aware that if you do not consent to the limited sharing within the Group of your identity and the information provided by you as needed, this may limit the Group's ability to progress your report and to take any action in relation to it.

## 9. Making disclosures anonymously

9.1. You can make an anonymous disclosure if you do not want to reveal your identity.

9.2. You are encouraged to provide your name because it will make it easier for the Group to address your concern and provide the required support and protections. For example, the context in which you observed any Reportable Conduct is likely to be useful, and the Group may seek further information from you to assist in any investigation.

9.3. If you do not provide your identity, the Group will assess your concern in the same way as if you had revealed your identity, and will conduct an investigation based on your report to the extent we are able and/or it is appropriate. However, an investigation may not be possible unless sufficient information is provided, and it may be difficult to offer you the same level of practical support and protection if the Group does not know your identity.

## 10. How will disclosures be investigated?

10.1. The Group takes Reportable Conduct very seriously. Disclosures of Reportable Conduct made under this Policy will be received and treated sensitively and seriously, and will be dealt with promptly and objectively by a WO.

10.2. The Eligible Recipients are authorised under this Policy to review each report received by them and determine, based on preliminary enquiries, whether it qualifies for protection and to determine whether a formal investigation is required, at the earliest opportunity.

- 10.3. The Group's response to a disclosure will vary depending on the nature of the disclosure (including the amount of information provided). The purpose of an investigation is to objectively determine whether there is enough evidence to substantiate or refute the matters reported.
- 10.4. The specific timeframe for an investigation will vary, depending on the nature of the allegations, the number of individuals to be interviewed (including any witnesses), and any other relevant matters.
- 10.5. Unless there are confidentiality or other reasons not to do so, persons to whom a disclosure relates will be informed of the allegation at the appropriate time, and given an opportunity to respond to the allegation(s) made against them. Where such persons are employees of the Group, they may also access the Group Employee Assistance Program (EAP), via Human Resources.
- 10.6. The findings of an investigation will be documented in an investigation report which remains the property of the Group and will not be provided to a Whistleblower or any other person to whom a concern relates, though it will be provided to the relevant decision-maker to determine appropriate outcomes. It may also be provided to individuals responsible for oversight over this Policy, subject to any applicable confidentiality requirements.
- 10.7. Where an investigation identifies Reportable Conduct or other inappropriate conduct, appropriate disciplinary action may be taken in the Group's discretion. This may include, but is not limited to, terminating or suspending the employment or engagement of a person(s) involved in any such conduct.
- 10.8. If an investigation finds that criminal activity is likely to have occurred, the matter may be reported to the law enforcement bodies and/or other regulatory authorities.
- 10.9. All employees of the Group must co-operate fully with any investigation that is undertaken.

## 11. Updating the Whistleblower

- 11.1. If you make a report of Reportable Conduct and you are able to be contacted, The Group will make reasonable endeavours to keep you informed of the progress of any investigation into your report, subject to privacy and confidentiality considerations. The frequency and timeframe of any updates may vary depending on the nature of the disclosure in the Group's discretion.
- 11.2. You may be advised of the findings of an investigation into Reportable Conduct (e.g. whether an allegation was substantiated) but the Group will otherwise decide whether to communicate to you or any other party the outcomes of any investigation in its absolute discretion.



## 12. What protections exist for a Whistleblower?

- 12.1. The Group strictly prohibits a Whistleblower under this Policy from suffering any detriment arising as a result of them raising a concern and has protections in place to seek to protect Whistleblowers from detriment.
- 12.2. There are laws in Australia to protect Whistleblowers under the *Corporations Act 2001* (Cth) ("Corporations Act") in relation to Australian operations or the operations of its Australian incorporated entities, which protects Whistleblowers where they make a disclosure about a "disclosable matter" to a person specified under the Corporations Act. Protections can also arise under the *Taxation Administration Act 1953* (Cth) ("Taxation Administration Act").
- 12.3. The Group will look for appropriate ways to support a Whistleblower who raises a concern and will endeavour to do its best to accommodate the specific form of protection needed, subject to operational constraint.

### *Protection from Detriment*

- 12.4. No person may cause detriment to someone else (or threaten to do so) because of a belief that that person has or will raise a genuine concern in relation to Reportable Conduct. Detriment may include:
  - a) termination of employment;
  - b) injury of an employee in their employment or alteration of their duties to their disadvantage;
  - c) harassment, bullying or intimidation;
  - d) discrimination between an employee and other employees;
  - e) harm or injury, including psychological harm;
  - f) damage to a person's property, reputation, business, financial position, or any other damage;
  - g) any other conduct that constitutes retaliation; and/or
  - h) threats to carry out any of the above.
- 12.5. Any person or group who engages in detrimental conduct against a Whistleblower because they have raised a concern regarding Reportable Conduct may be subject to disciplinary action (including, but not limited to, termination of employment or engagement). In some circumstances, this conduct may also attract civil and/or criminal penalties.
- 12.6. You should tell WO if you or someone else is being, or has been subject to, detrimental conduct because of raising a concern about Reportable Conduct under this Policy. The WO will treat this very seriously. If you consider that the WO has not adequately resolved a complaint regarding detrimental conduct, you can escalate your complaint to the Rex Chief Executive Officer.

- 12.7. Rex Employees will at all times be able to raise and address with a person matters that arise in the ordinary course of their employment or contractual relationship with their manager or the Human Resources Department (for example, any separate performance or misconduct concerns).

*Specific protections available*

- 12.8. The protections offered will be determined by a WO and will depend on things such as the nature of the Reportable Conduct and the people involved. Protections may include the following:
- a) monitoring and managing the behaviour of other employees;
  - b) implementing investigation processes where appropriate;
  - c) taking disciplinary action where appropriate for conduct that amounts to detrimental conduct or breaches the confidentiality requirements under this Policy;
  - d) re-locating individuals (which may include the people alleged to have been involved in the Reportable Conduct) to a different team, practice group or office;
  - e) offering an individual a leave of absence or flexible workplace arrangement while a matter is being investigated; and/or
  - f) providing support services.
- 12.9. The WO will look for appropriate ways to support a Whistleblower who raises a concern, but it will not be able to provide the same type and level of support to people who are not employees or Partners. In this case, a WO will still seek to offer appropriate support.

### 13. Access, awareness and training

This Policy will be made available to Employees via the Group's Intranet pages. New Employees will be informed of this Policy on induction. Key people, including those involved in the Whistleblowing process, will receive training, including in relation to how to respond to disclosures where relevant.

### 14. Data protection

- 14.1. When you raise a concern of Reportable Conduct, the Group may collect personal information.
- 14.2. The Group collects, holds, uses and discloses any personal information you provide to assist it in addressing your concerns, including to assess whether your allegation is Reportable Conduct, to conduct any investigation and take any other appropriate action.
- 14.3. While the Group takes steps to minimise the disclosure of your personal information to other parties, the parties to whom the Group usually (but not necessarily in certain circumstances) discloses your information include other parties allegedly involved in the Reportable Conduct, regulators and, where necessary, third-party service providers, such as investigators and financial, legal and other advisers. However, in all circumstances, we will only disclose your personal information in accordance with applicable law (such as in circumstances where you provide consent) and if we are precluded by legislation in relation to Whistleblowers or any other legislation from disclosing your personal information to any of these parties, we will not do so.

### 15. Periodic Review

Approved by Management Committee  
Date Issued: 07 October 2025

This Policy will be reviewed every 3-years (or sooner if required) to ensure it is operating effectively and whether any changes are required. This review will also ensure that the Policy evolves in line with changes in the nature, scale and complexity of the Group's business, its operating and regulatory environments.

#### 16. Compliance with this Policy

- 16.1. If you are concerned that a breach of this Policy has occurred or will occur, you should report your concern to those listed at clause 5. If your concern has not been resolved, the concern can be escalated to the Chief Executive Officer.
- 16.2. A breach of this Policy may be regarded as misconduct, which may lead to disciplinary action (including up to termination of employment or engagement). An individual may also be exposed to criminal or civil liability for breach of the relevant legislation
- 16.3. Any alleged breach of this Policy will be taken seriously, and, if appropriate, will be separately investigated.

## Definitions

<b>Matters</b>	Refers to alleged contraventions of the internal rules, policies and Disclosable Conduct which are in scope of this Policy.
<b>this Policy</b>	Means this Whistleblower Policy.
<b>Whistleblower (may also be called Discloser)</b>	A Whistleblower is a person who makes a disclosure relating to a breach of internal rules or Disclosable Conduct under this Policy. A Whistleblower may request protection either in terms of this Policy or in terms of the RO Act.
<b>Whistleblower Officer (WO)</b>	A senior officer of the Organisation who is responsible for either leading, co-ordinating or overseeing the investigation of matters in a fair, confidential, objective (without bias) and timely manner or may be response, as far is reasonably practicable, to protect any disclosed who makes a report to the organisation.