

WHISTLE BLOWER POLICY

1. INTRODUCTION

- (a) Redflex Holdings Limited (**Redflex**) and its global subsidiaries (**Redflex Group**) is committed to conducting its business operations and affairs with honesty and integrity.
- (b) Further, the Redflex Group is committed to engaging in ethical decision-making, being legally compliant and acting consistently with good corporate governance standards and community expectations.
- (c) The purpose of this Policy is to encourage and provide a readily accessible means to report unethical, unlawful, fraudulent or other misconduct involving Redflex, any member of Redflex Group or any director, officer or employee of these entities.
- (d) Redflex will also ensure that whistle blower can make reports under this Policy anonymously (if they so choose) and confidentially without fear of intimidation, retaliation or adverse employment action being taken against them.
- (e) A copy of this Policy is available on the Redflex website (www.redflex.com).
- (f) In addition to Redflex considering that it is important that whistle blowers are encouraged to report misconduct, and are protected when they do so, there are specific provisions under Australian legislation which provide whistle blowers with legal rights in relation to certain types of disclosures.
- (g) The relevant legislation is sections 1317AA to 1317AJ of the *Corporations Act 2001* (Cth) and sections 14ZZT to 14ZZZE of the Taxation Administration Act 1953 (Cth) (the **Whistleblowing Legislation**). For a whistle blower to obtain the protections set out in the Whistleblowing Legislation the whistle blower must:
 - (i) be an 'eligible whistle blower': a list of eligible whistle blowers is set out in paragraph 3 of this Policy;
 - (ii) be reporting on a 'disclosable matter': disclosable matters are those matters described in paragraph 2 of this Policy; and
 - (iii) report that disclosable matter to an 'eligible recipient' or other person authorised to receive a disclosure under the Whistleblowing Legislation: a list of eligible recipients and other persons to whom a report can be made is set out in paragraph 3 of this Policy.

If a whistle blower meets these three criteria, they have made a Qualifying Disclosure and are entitled to the protections under the Whistleblowing Legislation.

- (h) This Policy contains a summary of parts of the Whistleblowing Legislation, and for further detail, you should refer to the text of this legislation. This Policy is not intended to override any rights or obligations you may have under the Whistleblowing Legislation.

- (i) This document should be read in conjunction with the following internal policies:
 - (i) Anti-Bribery and Anti-Corruption Policy;
 - (ii) Continuous Disclosure Policy;
 - (iii) Redflex Securities Trading Policy;
 - (iv) Employee Code of Conduct and Ethics;
 - (v) Directors' Code of Conduct and Protocols; and
 - (vi) other policies and procedures,all of which are available on the Redflex website (www.redflex.com).

2. CONDUCT THAT SHOULD BE REPORTED

- (a) A whistle blower should make a report under this Policy where the whistle blower has reasonable grounds to suspect that Redflex, any member of Redflex Group or any director, officer or employee of these entities has engaged in misconduct or an improper state of affairs. This includes misconduct or an improper state of affairs in relation to the tax affairs of Redflex or an associate of Redflex (**Tax Disclosure**).
- (b) Such conduct is a '**disclosable matter**' under the Whistleblowing Legislation and this Policy.
- (c) Examples of such conduct include, but are not limited to, conduct that:
 - (i) is dishonest, fraudulent, corrupt or criminal, including paying a bribe or engaging in any other activity in violation of Redflex's Anti-Bribery and Anti-Corruption Policy (or accompanying procedures);
 - (ii) is unethical or in material violation of Redflex's policies or procedures (for example, dishonestly altering company records or engaging in suspect accounting practices);
 - (iii) is unlawful or criminal under federal, state or local (city or municipal) law (for example, stealing, assault, forgery or wire fraud);
 - (iv) is materially damaging to Redflex or any member of the Redflex Group or any Redflex director, officer or employee (for example, engaging in materially unsafe or dangerous work practices, committing material environmental damage, creating material health risks or a material misuse of Redflex property or resources);
 - (v) constitutes an abuse of authority;
 - (vi) involves false or misleading, or otherwise dishonest or improper, accounting or financial reporting practices;

- (vii) constitutes a conflict of interest or a material personal interest in a matter that has not been properly disclosed or consented to;
 - (viii) may cause material financial loss or damage to Redflex or the Redflex Group;
 - (ix) involves any other kind of serious misconduct or impropriety; or
 - (x) may violate taxation laws, the Australian *Corporations Act 2001* (Cth) or any other law applicable to corporations.
- (d) Disclosable matters can include conduct that may not involve contravention of a particular law. A whistle blower can still qualify for protection even if their disclosure turns out to be incorrect. Disclosures that are not about disclosable matters do not qualify for protection under the Whistleblowing Legislation.
- (e) Redflex employees who become aware of conduct that should be reported under this Policy must make a report under this Policy.

What matters should not be reported under this Policy

- (f) Personal work-related grievances should not be reported under this Policy and are not protected under the Whistleblowing Legislation (though such disclosures may be protected under other legislation, for example the *Fair Work Act 2009* (Cth)).
- (g) Some examples of matters which should not be reported under this Policy include:
- (i) a staff member's dissatisfaction with their pay; and
 - (ii) a staff member's failure to receive a promotion.
- (h) A personal work-related grievance may still qualify for protections under the Whistleblowing Legislation if:
- (i) it includes information about misconduct, or information about misconduct includes or is accompanied by a personal work-related grievance (a mixed report);
 - (ii) the entity has breached employment or other laws punishable by imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond the discloser's personal circumstances;
 - (iii) the discloser suffers from or is threatened with detriment for making a disclosure; or
 - (iv) the discloser seeks legal advice or legal representation about the operation of the Whistleblowing Legislation.

3. MAKING A WHISTLE BLOWER REPORT

Who may be a whistle blower

- (a) A whistle blower may be any current or former officer or employee of Redflex, or a person or company who has a contract for the supply of goods and services to Redflex (a 'contractor'), or an employee of such a contractor, or an individual who is an associate of Redflex, or a relative of any such person, or dependant of any such person or of their spouse.

Where to make a whistle blower report

- (b) Whistle blowers can make a report to the following Disclosure Officers:
- (i) the Whistle Blower Hotline (see Annexure A to this Policy);
 - (ii) the Group General Counsel & Company Secretary:
Email whistleblowerDO@redflex.com
 - (iii) the Chair of the Audit & Risk Committee of the Redflex Board of Directors:
Email clark.davey@redflex.com
 - (iv) the Company's external auditor (PricewaterhouseCoopers):
Lead Audit Partner: jason.perry@pwc.com
 - (v) a Redflex senior manager, namely a person who makes, or participates in making, significant business decisions of Redflex.
- (c) The making of a report to a person named above means that it has been made to an eligible recipient under the Whistleblowing Legislation that may qualify for protection thereunder. In particular, the recipient generally has an obligation to keep your identity confidential if the Whistleblowing Legislation applies unless you otherwise consent.
- (d) Where the information to be reported relates to the tax affairs of Redflex or an associate of Redflex, whistle blowers are still encouraged to report any disclosure via the methods set out above. Additionally, the Whistleblowing Legislation allows whistle blowers to make Tax Disclosures to additional eligible recipients including:
- (i) a registered tax agent or Business Activity Statement (BAS) agent who provides tax agent services or BAS services to Redflex; or
 - (ii) any other employee or officer (within the meaning of the *Corporations Act 2001* (Cth)) of Redflex who has functions or duties that relate to the tax affairs of Redflex.
- (e) Under the Whistleblowing Legislation, whistle blowers may also report such information to:
- (i) the Australian Securities and Investments Commissions (ASIC);
 - (ii) the Australian Prudential Regulation Authority (APRA);



- (iii) in relation to Tax Disclosures, the Commissioner of Taxation (ATO); or
- (iv) any other prescribed Commonwealth authority or regulator.

However, if a whistleblowing report is made to one of these regulators Redflex will not automatically become aware of that report and therefore may not be able to respond to it in accordance with this Policy.

- (f) Disclosure Officers are authorised to receive, handle, manage, and assist to resolve reports under this Policy. Disclosure Officers also have the authority to make reports to the Audit & Risk Committee of the Redflex Board of Directors (while keeping the identity of the whistle blower confidential unless the whistle blower otherwise consents).
- (g) A Disclosure Officer will keep the whistle blower's identity confidential and will not disclose the identity of the whistle blower without the whistle blower's consent to the extent required by the Whistleblowing Legislation.
- (h) A report will also qualify for protection where an eligible whistle blower makes a disclosure to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the Whistleblowing Legislation, even in circumstances where the legal practitioner concludes that a disclosure does not relate to a 'disclosable matter'.
- (i) A whistle blower can obtain additional information about making a disclosure by contacting the Senior Vice President - Group General Counsel & Company Secretary.

How to make a disclosure

- (j) Whistle blowers are encouraged make disclosures to a Disclosure Officer whether on an anonymous basis or not.
- (k) Disclosures 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 reporting the alleged misconduct:
 - (i) **What occurred** – describe the act that is suspected or has been witnessed. It is useful to also describe what should have happened, so the report taker is clear about the nature of the alleged misconduct being described. Report:
 - (A) what occurred;
 - (B) the sequence of events leading up to witnessing the act;
 - (C) the steps observed; and
 - (D) any actions taken to confirm suspicions or observations.
 - (ii) **How the alleged misconduct was executed** – describe any factors that may have enabled the alleged misconduct or contributed to the alleged

misconduct going undetected, being concealed or being previously unidentified.

- (iii) **Where it occurred** including:
 - (A) the physical location/address that the alleged misconduct occurred; and
 - (B) the work location of those perpetrating the alleged misconduct or the location where the misconduct was observed.
- (iv) **When the misconduct occurred** – key dates of actions suspected or observed relating to the alleged misconduct being disclosed. If a series of events occurred, offer these in chronological order if possible.
- (v) **Who was involved** – offer names and job titles of those associated with the alleged misconduct, if known, or information that may help identify those that may have been associated with the alleged misconduct. Also offer names of others that may have witnessed or played a role in the acts being reported.

No time limit on disclosures

- (l) There is no time limit associated with making whistleblowing disclosures. However, the sooner misconduct is reported and the more likely it is that reliable evidence will be able to be gathered as part of any investigation and Redflex can address the matter.
- (m) There may be limitations regarding legal action that can be taken in response to proven allegations but this should not deter whistle blowers from making a disclosure about misconduct they have reasonable grounds to believe occurred. All disclosures can assist Redflex refresh risk management monitoring, training and controls.

Anonymous disclosures

- (n) Whistle blowers can make an anonymous disclosure and they will still be entitled to the protections set out in this Policy and under the Whistleblowing Legislation if the other requirements for making the disclosure are complied with. Whistle blowers can remain anonymous over the course of the investigation and after any investigation has been finalised. However, whistle blowers wishing to remain anonymous should maintain ongoing two-way communication with Redflex so follow-up questions or feedback can be provided.
- (o) A whistle blower may refuse to answer questions that they feel could reveal their identity during follow-up conversations. If appropriate in the circumstances, whistle blowers may adopt a pseudonym for the purposes of their disclosure.
- (p) However, it should be noted that if the whistle blower's identity is not provided when making a whistleblowing report this:
 - (i) may prevent Redflex from re-contacting the whistle blower confidentially to clarify or confirm information supplied;

- (ii) may impact on Redflex's ability to proceed with investigation - if there are gaps in information supplied that cannot be clarified directly in confidence with a whistle blower;
 - (iii) will prevent Redflex from updating the whistle blower on Redflex's efforts taken in response to their disclosure; and
 - (iv) may affect Redflex's ability to take steps to protect the whistle blower from detriment.
- (q) If a whistle blower wants to maintain complete anonymity when making a disclosure, we suggest the whistle blower:
- (i) submits their disclosure from a computer not connected to the Redflex Group's network;
 - (ii) if making the disclosure by phone, calls from an unlisted number;
 - (iii) if submitting an email, uses a private email address (e.g. like Gmail or another external email provider) – not one connected to the Redflex Group's network; and
 - (iv) refrains from telling others that they have filed a whistleblowing disclosure.
- (r) Even if a whistle blower does not make the report on an anonymous basis the person receiving the report is not generally permitted to reveal the identity of the whistle blower, or information that is likely to lead to the identification of the whistle blower unless the whistle blower consents.

Disclosures outside of Redflex

- (s) Generally, only reports that are made to the list of people or entities set out in paragraph 3(b) of this Policy will ensure protections are afforded to the whistle blower making the report. Making reports to others outside Redflex, except to the appropriate regulator or to a legal practitioner, will not obtain the protection of the Whistleblowing Legislation or any other protections provided by this Policy. This is because it is important to ensure that confidential information belonging to Redflex is not disclosed outside of Redflex.
- (t) There are two categories of disclosure that a whistle blower may make to a journalist or a Member of the Australian Parliament and still obtain the protections of the Whistleblowing Legislation. These are called Public Interest Disclosures and Emergency Disclosures.
- (u) It is important for the whistle blower to understand the criteria for making a Public Interest Disclosure or an Emergency Disclosure. A whistle blower should contact an independent legal adviser before making such a disclosure.
- (v) **Public Interest Disclosure** - this category allows a whistle blower to make a disclosure to a journalist or parliamentarian if:

- (i) the whistle blower has previously made a disclosure to ASIC, APRA or any other prescribed Commonwealth authority;
 - (ii) at least 90 days have passed since the disclosure was made to ASIC, APRA or any other prescribed Commonwealth authority;
 - (iii) the whistle blower does not have reasonable grounds to believe that action is being taken to address the matters to which the previous disclosure related;
 - (iv) the whistle blower has reasonable grounds to believe that making a further disclosure of the information would be in the public interest; and
 - (v) following the end of the 90-day period, the whistle blower gives the body to which the previous disclosure was made a written notification that includes sufficient information to identify the previous disclosure and states that the whistle blower intends to make a public interest disclosure.
- (w) **Emergency Disclosure** - this category allows a whistle blower to make a disclosure to a journalist or a parliamentarian if:
- (i) the whistle blower has previously made a disclosure to ASIC, APRA or any other prescribed Commonwealth authority;
 - (ii) the whistle blower has reasonable grounds to believe that the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment; and
 - (iii) the whistle blower gives the body to which the previous disclosure was made a written notification that includes sufficient information to identify the previous disclosure and states that the whistle blower intends to make an emergency disclosure.

For both Public Interest Disclosures and Emergency Disclosures, the extent of the information disclosed must be no greater than is necessary to appropriately inform the recipient of the relevant misconduct or substantial imminent danger.

- (x) Unless a disclosure is being made under those provisions, speaking to a journalist or a member of parliament about confidential information relation to Redflex without authorisation is not permitted and may be a workplace disciplinary matter.

4. REDFLEX'S INVESTIGATION OF REPORTED MATTERS

- (a) Redflex will:
 - (i) assess all matters reported under this Policy regarding whether or not the Whistleblowing Legislation applies;
 - (ii) if necessary, investigate matters reported under this Policy as soon as practicable after the matter has been reported; and



- (iii) in doing so, determine the scope and resources necessary for any investigation of a matter reported under this Policy.
- (b) A Disclosure Officer may appoint a person to assist in the investigation of a matter raised in a report.
- (c) Investigations will be subject to the confidentiality and other protections set out under this Policy and will be undertaken by an appropriate investigator depending on the nature of the investigation.
- (d) In the conduct of an investigation, Redflex may proceed as follows:
 - (i) speak to anyone who may be affected or involved in the disclosure so that they are provided with the opportunity to respond to the allegation(s);
 - (ii) consider these responses; and
 - (iii) speak to witnesses (where there is a dispute as to the facts surrounding the allegations).
- (e) Redflex will endeavour to conduct any investigation in a comprehensive and fair manner including ensuring procedural fairness and due process to any person accused of wrongdoing. Redflex will also afford the presumption of innocence to any person accused of wrongdoing.
- (f) The method for documenting and reporting the findings will depend on the nature of the disclosure. In most cases, a final investigation report will be provided to the Audit & Risk Committee of the Redflex Board. Where necessary, any final investigation report may be redacted to protect the whistle blower's identity or information that may identify the whistle blower.
- (g) Subject to compliance with applicable law, rules or regulations, valid search warrant or court order, all books and records created for the sole purpose of an investigation into a whistle blower report will be confidential. Any disclosure of such books and records to unauthorised persons (for example, other than ASIC, APRA, the AFP or a person you have consented to) will be a violation of this Policy.

Providing updates to those making whistle blower disclosures

- (h) Where appropriate, Redflex will provide feedback to the whistle blower regarding the progress and outcome of any investigation. Any updates will be provided by the Senior Vice President – Group General Counsel & Company Secretary or the Disclosure Officer. Where the whistle blower report is made through the Whistle Blower Hotline, this feedback will be given through the Whistle Blower Hotline tools.
- (i) Any updates supplied to a whistle blower may need to be limited in order to also preserve the confidentiality of an investigation and the privacy of those potentially affiliated, named, implicated or associated with the matters disclosed. The frequency and detail of any updates supplied (where appropriate), and the initiation or resolution of any potential subsequent investigation, may vary according to the matters reported and the context of the misconduct disclosed.



- (j) Redflex will, where appropriate, advise the whistle blower of the conclusion of any investigation and provide the whistle blower with details of the outcomes of that investigation. Where claims cannot be substantiated, and the whistle blower's identity is known – Redflex reserves the right to deem a disclosure closed and notify the whistle blower accordingly.

5. FAIR TREATMENT OF EMPLOYEES THAT ARE THE SUBJECT OF THE DISCLOSURE

- (a) Redflex is also committed to ensuring the fair treatment of employees and other persons engaged by Redflex who are mentioned in reports of disclosable matters, or to whom such disclosures relate. Fair treatment of those persons implicated in an alleged misconduct disclosure includes, but is not limited to:
 - (i) the opportunity to be 'heard' on, and respond to the allegations as against them before any adverse findings are made against them; and
 - (ii) the opportunity to have their responses considered by Redflex and, in appropriate circumstances, investigated.
- (b) During any investigation into a report of disclosable matters, Redflex extends support and protection to employees, officers and others engaged by Redflex and implicated in the report until such investigation has concluded and claims have been proven or dismissed. Any suspected adverse or detrimental treatment in this regard should be reported to the Senior Vice President – Group General Counsel & Company Secretary so that these matters may be addressed.
- (c) Redflex will endeavour to respond promptly to any complaints raised by parties who are the subject of a disclosure where such party has concerns about unfair treatment in the context of assessment of, and investigation into, the disclosable matter.

6. PROTECTION AND SUPPORT OF WHISTLEBLOWERS

Confidentiality

- (a) Redflex will take all reasonable steps to ensure confidentiality of all reports made under this Policy.
- (b) If you do disclose your identity and you are an 'eligible whistle blower' who is making a disclosure protected by the Whistleblowing Legislation via the methods set out in this Policy or to other 'eligible recipients', the recipient has an obligation to keep your identity confidential. This includes keeping confidential information which could lead to the disclosure of your identity.
- (c) Redflex has the legal right to share a whistle blower's identity if reasonably necessary to refer an incident to authorities (such as ASIC, APRA and the Australian Federal Police (AFP) or other prescribed body) who may wish to pursue the matter.
- (d) Under the Whistleblowing Legislation, it is also permissible to:

- (i) disclose information regarding the suspected or actual wrongdoing disclosed without revealing the whistle blower's identity or information that is likely to lead to the identification of the whistle blower;
 - (ii) disclose information other than the whistle blower's identity if it is reasonably necessary for the purposes of the investigation and all reasonable steps are taken to reduce the risk that the whistle blower will be identified;
 - (iii) disclose the identity of a whistle blower, or information likely to lead to his or her identification to (or between) ASIC, APRA, AFP or other prescribed body;
 - (iv) disclose the identity of a whistle blower, or information likely to lead to his or her identification to a legal practitioner for the purposes of obtaining legal advice or representation in relation to the disclosure; or
 - (v) disclose the identity of a whistle blower where such disclosure is made with the consent of the whistle blower
- (e) In order to allow for a proper investigation of the matter, and to provide support to the whistle blower, the recipient of your disclosure may ask you to consent to the disclosure of your identity to specific individuals, such as:
- (i) the Senior Vice President – Group General Counsel & Company Secretary and the Chairman of the Audit & Risk Committee of the Redflex Board; and
 - (ii) any other persons reasonably necessary for the purposes of investigating matters the subject of your disclosure.
- (f) To ensure the confidentiality of a whistle blower's identity, Redflex will ensure:
- (i) all personal information or reference to the whistle blower witnessing an event will be redacted;
 - (ii) the whistle blower will be referred to in a gender-neutral context;
 - (iii) where possible, the whistle blower will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them; and
 - (iv) disclosures will be handled and investigated by qualified staff.
- (g) If you are the recipient of a report from a whistle blower relating to a disclosable matter, you must not reveal the identity, or information that is likely to lead to identification, of the whistle blower without the written consent of the whistle blower or without the express permission from the Senior Vice President – Group General Counsel & Company Secretary or the Chairman of the Audit & Risk Committee of the Redflex Board to make the disclosure. Such action is illegal and may constitute a criminal offence.

- (h) Whistle blowers can be assured that any information released in breach of this Policy will be treated seriously and may result in disciplinary action, including dismissal. A breach of this Policy may in certain circumstances also result in criminal sanctions. Whistle blowers should report any suspected or actual breaches of confidentiality to the Senior Vice President – Group General Counsel & Company Secretary or the Chairman of the Audit & Risk Committee of the Redflex Board. A whistle blower may also lodge a complaint with a regulator, such as ASIC, APRA or the ATO, for investigation.

Fair treatment

- (i) Redflex will take reasonable steps to ensure that all whistle blowers who make, or are believed to have made or propose to make, a report regarding a disclosable matter are treated fairly without fear of intimidation, retaliation or adverse employment action being taken against them.
- (j) Any person who is subjected to detriment (including intimidation, retaliation or adverse employment action taken against them) as a result of making a report under this Policy should inform a Disclosure Officer immediately.
- (k) Under this Policy “detriment” also includes termination of employment, demotion, harassment, discrimination, bias, threats, harm (including psychological harm), damage to property or other unfavourable treatment in connection with making a report.
- (l) However, “detriment” does not include a person being subjected to genuine and articulable performance management, the identification of additional training requirements for any person or the extension of any employment probationary period based on genuine and articulable performance concerns.
- (m) Where appropriate, to protect a whistle blower from the risk of detriment, Redflex may:
 - (i) conduct a risk assessment of the whistle blower, and any other staff that might be suspected of having made a disclosure;
 - (ii) allow a whistle blower to perform their duties from another location;
 - (iii) reassign the whistle blower to another role (at the same level);
 - (iv) make modifications to the whistle blower's workplace or the way work duties are carried out; or
 - (v) reassign or relocate other staff involved in the disclosable matter.

Support of whistle blowers

- (n) Redflex firmly believes that those who reasonably suspect or witness misconduct should be able to report their suspicions with the confidence that they will be supported, and not punished or discriminated against for making a disclosure.
- (o) Whistle blowers are encouraged to raise any concerns arising out of a disclosure (or anticipated disclosure) or any subsequent investigation process to a

Disclosure Officer via the methods set out above or to the Senior Vice President – Group General Counsel & Company Secretary.

- (p) To ensure whistle blowers are supported both during and following the making of a disclosure, Redflex encourages whistle blowers to make use of Redflex's employment assistance program or EAP provider, details of which are set out below:

Converge International

Australia – Telephone 1300 687 327

New Zealand – Telephone 0800 666 367

International – Telephone +61 3 8620 5300

Email: eap@convergeintl.com.au

www.convergeinternational.com.au

Criminal or civil liability

- (q) Whistle blowers who make a Qualifying Disclosure will not be subject to any civil liability (e.g. breaching a duty of confidence), criminal liability (e.g. prosecution for unlawfully releasing information) or administrative liability (e.g. disciplinary action) for making the disclosure. No contractual or other remedy may be enforced against them on the basis of their disclosure.
- (r) There is no immunity from any action in relation to misconduct that the whistle blower was involved in. However, if a whistle blower reports such conduct and actively cooperates in an investigation in which they may be implicated, the fact they have made a report may be considered as a mitigating factor when determining actions which may be taken against them.
- (s) Under the Whistleblowing Legislation, a person may bring civil proceedings for a compensation order or pursue civil penalties even when a criminal prosecution has not been, or cannot be, pursued. This may include circumstances in which a whistle blower (or any other person) has suffered loss, damage or injury and Redflex has failed to prevent a person from causing the detriment.

7. COMPLIANCE WITH THIS POLICY

All directors, officers and employees are expected to comply with this Policy (as amended and updated from time to time). However, this Policy does not:

- (a) form part of the terms of an employee's employment and it cannot be enforced by any employee as a contractual promise; or
- (b) give rise to any expectation of a particular outcome or decision on any matter arising under or pursuant to this Policy.

8. RESPONSIBILITY FOR IMPLEMENTATION OF THE POLICY

- (a) The Senior Vice President - Group General Counsel & Company Secretary has overall responsibility for the effectiveness of this Policy and is also responsible for monitoring and reviewing the operation of this Policy and making recommendations for changes to minimise risks to the Company's operations.
- (b) All employees are responsible for their own compliance with this Policy and for ensuring that the Policy is consistently applied.
- (c) All employees should ensure that they take the time to read and understand this Policy.
- (d) Any material violations of this Policy should be reported to the Group General Counsel & Company Secretary or via the Whistle Blower Hotline.
- (e) Questions regarding the content or application of this Policy should be directed to the Group General Counsel & Company Secretary.

9. REVIEW OF POLICY

- (a) The Company will review this Policy periodically to ensure it complies with applicable legal requirements and remains relevant and effective.
- (b) The Company may change this Policy at any time. However, this Policy cannot be changed without the approval of the Redflex Board of Directors.
- (c) This Policy is not intended to be contractual in nature.

CHANGE HISTORY

Change History Log

| Version | Description | Date |
|---------|-------------|-----------------|
| 1.0 | New Policy | 1 July 2019 |
| 2.0 | Revision | 29 January 2020 |

Annexure A

Whistle Blower Hotline Contact Details

Online Reports (24/7/365):

www.yourcall.com.au/report

Insert Organisation ID: **RDF**

Telephone Reports:

9:00am to 12:00am AEST - Australian Eastern Standard Time

Monday through Friday (except Melbourne holidays)

Outside these hours, Employees are encouraged to make online reports

| Country of Employee Residence | Telephone Number |
|-------------------------------------|------------------|
| Australia | 1300 790 228 |
| United States of America and Canada | 1 (800) 897 2761 |
| United Kingdom | 0 800 046 5662 |
| Ireland | 1800 901 751 |
| Saudi Arabia | 800 885 1000 |
| United Arab Emirates | 800 032 0344 |
| New Zealand | 0800 123 508 |
| Malaysia | 1800 814 532 |