

WHISTLEBLOWING POLICY

Policy Statement

This Whistleblower Policy (Policy) has been adopted to ensure that staff can raise concerns regarding actual or suspected contravention of the Company's ethical and legal standards without fear of reprisal or feeling threatened by doing so.

This Policy aims to:

- encourage people to report an issue if they genuinely believe someone has contravened the Company's Code of Conduct, policies or the law;
- outline how ReNu Energy will properly deal with all reported misconduct or unethical behaviour; and
- assist in ensuring that serious misconduct or unethical behaviour is identified and dealt with appropriately.

Purpose

The purpose of this policy is to promote responsible whistleblowing about issues where the interests of others, including the public, or of the Company itself are at risk. For the purposes of making a report under this Policy, matters may include any actual or suspected:

- criminal offence or breach of any law;
- breach of a legal obligation or any of ReNu Energy's policies;
- theft, fraud or misappropriation;
- significant mismanagement or waste of funds or resources;
- abuse of authority;
- serious danger to the health or safety of any individual;
- serious damage to the environment;
- any action taken against, or harm suffered by an employee as a result of making report under this Policy.

The exception is where the issue relates to a member of staff's personal position, when it would be more appropriate to use the Company's grievance procedure.

A member of staff raising a concern will not be expected to produce unquestionable evidence to support the case - this is the responsibility of the Company once it has been alerted to a potential problem. All that is required is that the member of staff has a genuine doubt and that the concern is raised in good faith. It is in the Company's interests to hear of suspicions at the earliest possible opportunity.

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Scope

This Policy applies to all employees and officers of ReNu Energy whether full time, part time or casual at any level of seniority wherever employed.

Policy Outline

You will not be discriminated against or disadvantaged in your employment with ReNu Energy for making a report in accordance with this Policy, nor will you receive reprisals due to your actions in making a report. ReNu Energy will take all reasonable steps to ensure that adequate and appropriate protection is being provided for those who, in good faith, make a report. This protection applies if the matter is proven or not, regardless of whether it is reported to an external authority.

Whistleblowing is not about airing a grievance. It's about reporting real or perceived malpractice. A report may damage the career prospects and reputation of people who are the subject of serious allegations and therefore if your report is not made in good faith or is found to be malicious, deliberately misleading or frivolous, you may be subject to disciplinary action.

A whistleblower will not be regarded as a sneak or troublemaker. The Company recognises that a whistleblower usually only decides to express a concern after a great deal of thought. The Company will not tolerate the harassment or victimisation of anyone who raises a genuine concern and will deal with any such occurrences under the disciplinary and/or harassment procedure

Procedures for reporting concerns

If you become aware of any matter or behaviour you think contravenes ReNu Energy's Code of Conduct, policies or the law, then you should:

- take the matter up with your immediate supervisor or manager;
- report the matter to your Human Resources manager, a more senior manager, or the Company Secretary; or

The Company will investigate all reported concerns appropriately and will, where applicable, provide feedback regarding the investigation's outcome. ReNu Energy will take the necessary course of action in response to a report and if no action is taken will give you an explanation. If it thinks the matter should be pursued through the grievance procedure instead of through this policy, the Company will advise the member of staff accordingly.

Your identity and the fact that you have made a report and the contents of the report will be kept confidential and no details of your participation in this process will be included in your personnel file or performance review. The report will not be disclosed to anyone except those that are actively involved in investigating the matters raised in the report.

Review

This policy will be reviewed every two years or as/when required for operations outside the Australian jurisdiction. Superseded versions will be retained for reference for two years.

References

Nil

Authorised on behalf of ReNu Energy:

A handwritten signature in black ink, appearing to read 'Greg Watson', with a long horizontal line extending to the right.

Greg Watson

Chief Executive Officer

January 2022