

Group Procedure	Title: <b><i>Speak Up Procedure</i></b>			Document no.: <b>E&amp;I-C-003</b>
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Owner: <b>Head of Ethics &amp; Integrity</b>	Approver: <b>Group Executive, Group General Counsel</b>		Target audiences: <b>All employees, directors, officers, contractors including external contractors, customers, joint venture partners, and other service providers or suppliers, as well as relatives, dependents or spouses of the above.</b>	
Direct Linkages to Other Relevant Policies, Standards, Procedures or Guidance Notes:  <b><i>The way we work</i></b> <b><i>Business Integrity Standard</i></b> <b><i>Business Integrity Procedure</i></b> <b><i>Investigations Procedure</i></b> <b><i>Competition Standard</i></b> <b><i>Rio Tinto Risk Management Standard</i></b>				
Document purpose:  <b>The <i>Speak Up Procedure</i> is key in meeting Rio Tinto’s commitment to protect and prevent retaliation against those who speak up. The purpose is to explain the mechanisms in place for employees and others (including people external to Rio Tinto) to raise concerns and what they can expect if they speak up.</b>				

# Speak Up Procedure

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## Section 1: Overview

### 1.1 Purpose

The purpose of this Procedure is to explain how concerns regarding matters relating to Rio Tinto, its business and its people can be raised, in confidence and without fear of retaliation. The Procedure also sets out who can make a report and what you can expect from Rio Tinto if you do report a concern.

The Procedure explains that there are two types of reports which might be made: (i) a “Speak Up Report” which is defined in this Procedure, and (ii) other reports of concerns, not falling into the definition of a Speak Up Report.

Rio Tinto encourages reporting of all concerns, not just Speak Up Reports, and is committed to protecting reporters from suffering any detriment or retaliation as a result of making a report.

### 1.2 Why is this important?

Rio Tinto is committed to conducting our business with fairness, in compliance with the law, and in accordance with our core values of safety, teamwork, respect, integrity and excellence. Rio Tinto is also committed to fostering a culture where people feel safe to report conduct which does not align with those values.

Reporting concerns can help to prevent serious harm. It is an essential component within the broader Rio Tinto risk management framework, and key to our ongoing success and ability to operate.

### 1.3 Scope & compliance with local laws

This Procedure establishes the mandatory processes and required actions related to reporting at Rio Tinto.

For reports arising in connection with Rio Tinto’s Australian operations, or the operations of its Australian incorporated entities, there are specific requirements related to reporting, which are expressly mentioned in this Procedure.

However, it is important to remember that Rio Tinto operates in multiple countries; your legal rights and obligations as a reporter will depend on the laws applicable to your particular situation, and Rio Tinto must comply with all local laws.

If compliance with this Procedure would breach any local laws or if those local laws impose a higher standard of protection for those who chose to speak up, the applicable laws will take precedence.

### 1.4 How should we report breaches of this Procedure?

If you work at Rio Tinto and suspect a breach of this Procedure, you should report this to Rio Tinto’s confidential and independently operated whistleblowing service, Talk To Peggy, (<https://app.convercent.com/en-us/LandingPage/60732c5c-fb3c-e811-80e2-000d3ab6ebad>), which is available 24/7, or to another of the Eligible Recipients identified below.

Reports of breaches of any other Rio Tinto policies, standards or procedures should be made in accordance with Section 2 below.

## 1.5 What will happen should we fail to comply?

**Any departure from or exceptions to this Procedure require approval from the Head of Ethics & Integrity.**

Compliance with this Procedure is mandatory for those working at Rio Tinto. Failure to comply may result in disciplinary action up to and including dismissal.

In some cases, and depending on the applicable laws, the failure of an Eligible Recipient to obtain appropriate consent to share a reporter's identity, or any victimisation of a reporter, may constitute a criminal offence.

## 1.6 Where should we go for help?

If you work at Rio Tinto and have any questions about this Procedure or making a report, please ask your Ethics & Integrity regional Compliance team (<https://intranet.riotinto.org/publ/ist-cprc/contacts/Pages/Compliance-Managers.aspx>), a member of Group Investigations and Forensics Technology ("GIFT"), or send a question to [askE&I@riotinto.com](mailto:askE&I@riotinto.com).

If you are external to Rio Tinto and have any questions about this Procedure, please send a question to [askE&I@riotinto.com](mailto:askE&I@riotinto.com), or ask your Rio Tinto contact who will channel these to the correct internal contact in line with the above.

## Section 2: Process

### 2.1 Who can make a report?

All current and former employees, officers (including board directors and secretaries), Contractors, suppliers (including their employees), customers and joint venture partners of Rio Tinto, or relatives, dependants or spouses of any of these people, may make a report under this Procedure.<sup>1</sup> If you would like further information before making a report, please see paragraph 1.6 in section 1 above (*Where should we go for help?*).

### 2.2 What can we report?

Rio Tinto encourages reporting of all concerns, including but not limited to "Speak Up Reports". Speak Up Reports made in accordance with this Procedure will qualify for specific protections set out below.<sup>2</sup> However, Rio Tinto is committed to ensuring that all reporters are protected from

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<sup>1</sup> For disclosures arising in connection with Rio Tinto's Australian operations, or the operations of its Australian incorporated entities, a person who is a current or former officer or employee of Rio Tinto, a supplier of services or goods to Rio Tinto (including their employees), an associate of Rio Tinto, or a relative, dependant or spouse of any of these people, can make a protected disclosure under the Australian *Corporations Act 2001* (Cth) ("Australian Corporations Act").

<sup>2</sup> For reports arising in connection with Rio Tinto's Australian operations, or the operations of its Australian incorporated entities, a disclosure of information under Australian Corporations Act is only protected where an eligible discloser has reasonable grounds to suspect that it concerns misconduct or an improper state of affairs or circumstances in relation to a Rio Tinto company ("protected disclosure"). This includes (but is not limited to) disclosures relating to conduct that constitutes an offence or contravention under corporate and financial sector laws in Australia, offences that are punishable by at least 12 months' imprisonment, or conduct that represents a danger to the public or the financial system. A protected disclosure may be made to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the Australian Corporations Act, irrespective of the subject matter of the disclosure. Reports which are not made to a legal advisor in these circumstances, or which do not relate to the matters described above, do not qualify for protection under the Australian Corporations Act. A disclosure may, however, be protected under the Australian Taxation Administration Act 1953 (Cth) where the discloser has reasonable grounds to suspect that the

detriment (including retaliation or other harm) whether or not their report constitutes a Speak Up Report. The only exception is where a report is made by a reporter who knows it to be false. The making of false accusations may lead to disciplinary or other legal action.

#### **i. Speak Up Reports**

A “**Speak Up Report**” is a report of misconduct or improper circumstances or behaviours affecting Rio Tinto people or our business. You do not need to know that the matters you are reporting are true, but you must reasonably suspect that this is the case when you make the report. Speak Up Reports will qualify for particular protections set out in more detail below.

##### Examples

Speak Up Reports can include, but are not limited to, concerns about suspected or actual illegality, human rights abuses, workplace health, safety, environmental, or security violations, financial reporting failures, fraud, violations of Rio Tinto’s policies and procedures (including this Procedure), or business integrity issues in general.

Examples include reports of actual or suspected:

- (a) breaches or violations of Rio Tinto’s internal policies, standards and procedures, including but not limited to, The way we work, the Business Integrity Standard, the Business Integrity Procedure and the Competition Standard;
- (b) illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property;
- (c) fraud, money laundering, or misappropriation of funds;
- (d) sexual misconduct;
- (e) illegal evasion of tax or facilitation of tax evasion;
- (f) conflicts of interest;
- (g) offering or accepting of a bribe;
- (h) financial irregularities;
- (i) any failure to comply with, or breach of legal or regulatory requirements;
- (j) serious harm to health, safety or environment, including the health and safety of any employee;
- (k) detrimental conduct against a person who has made a Speak Up Report or who is believed to or suspected to have made or be planning to make such a report.

As noted above, you do not have to be sure that any reportable conduct has occurred in order to make a Speak Up Report. For example, if you only have some information leading to a reasonable suspicion, but not all the details, you can still make a Speak Up Report and you will be afforded protection as described in section 2.5 below, even if your report turns out to be incorrect. However, you must not make a report that you know to be false.

#### **ii. Other types of reports**

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information disclosed indicates misconduct or an improper state of affairs or circumstances in relation to the tax affairs of a Rio Tinto company or its people, or one of their associates.

While Rio Tinto encourages speaking up, and reporting of all concerns, not all types of concerns will constitute Speak Up Reports as defined above. Matters that will not constitute Speak Up Reports include:

- **Reports which do not relate to Rio Tinto** or otherwise do not meet the criteria for a Speak Up Report set out above;
- **Events presenting an immediate threat to life or property.** For emergency assistance, please contact the relevant emergency services;
- **Personal work-related grievances** that you may have in relation to your employment at Rio Tinto.<sup>3</sup> This includes, for example, interpersonal conflicts with another employee or challenges to decisions around performance evaluations, promotions or disciplinary action (including suspension or termination of employment). If you work at Rio Tinto and have concerns of this nature, please refer to the myWork page on the myRioTinto site (<https://www.myriotinto.com/gbl/en/mw/pages/default.aspx>), and please also speak with your local Human Resources contact or askHR. If you do not feel comfortable using these channels, you can also Talk To Peggy (<https://app.convercent.com/en-us/LandingPage/60732c5c-fb3c-e811-80e2-000d3ab6ebad>).

The only exception to the above rule, where a personal work related grievance could constitute a Speak Up Report, is if the personal work related grievance: (i) includes information about wrongdoing beyond your personal circumstances; (ii) would have significant implications for Rio Tinto, or (iii) relates to a person suffering from, or being threatened with detriment for making a Speak Up Report. In such cases, the report may still qualify as a Speak Up Report and therefore attract the specific protections set out in section 2.5 below.

## 2.3 How do we make a report?

If you wish to make a “Speak Up Report”, you should follow the process set out below.

### i. Speak Up Reports

Whether you work at, or are external to, Rio Tinto, you may make a Speak Up Report to any of the following persons<sup>4</sup>, together “**Eligible Recipients**”:

- Talk To Peggy (<https://app.convercent.com/en-us/LandingPage/60732c5c-fb3c-e811-80e2-000d3ab6ebad>);
- Head of Ethics & Integrity;

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<sup>3</sup> Personal work-related grievances also do not constitute protected disclosures under the Australian Corporations Act referred to in Footnote 2 above.

<sup>4</sup> This refers to Eligible Recipients within Rio Tinto or certain external auditors. However, you may be entitled to protections if you make a report externally, depending on the applicable laws. For disclosures arising in connection with Rio Tinto’s Australian operations, or the operations of its Australian incorporated entities, you must make a report to an Eligible Recipient, or certain other persons specified in the Australian Corporations Act, in order to qualify for protection under that Act. Those other specified persons include Australian Securities and Investments Commission (“ASIC”), the Australian Prudential Regulatory Authority (“APRA”), the Australian Commissioner of Taxation (in respect of tax matters), or a legal practitioner for the purposes of obtaining legal advice or representation in relation to the operation of these laws. In certain circumstances, “public interest” or “emergency” disclosures to journalists and Parliamentarians are also protected under the Corporations Act. It is important that you understand the criteria for making a “public interest” or “emergency” disclosure before doing so. For example, you must have previously made a disclosure to ASIC, APRA or another prescribed body and notified that body of your intention to make the disclosure before you can do so and, in the case of a “public interest” disclosure, at least 90 days must have passed since the previous disclosure. It is recommended that you seek legal advice before you make a “public interest” or “emergency” disclosure.

- A board director or board secretary of an Eligible Rio Tinto Entity;
- A senior manager, i.e. a senior leader in Band A-E, of an Eligible Rio Tinto Entity; or
- An internal or external auditor (including a member of an audit team conducting an audit), or an actuary, of an Eligible Rio Tinto Entity.

In most cases it will be quicker and more efficient to make a Speak Up Report directly to Talk To Peggy as in most cases, other Eligible Recipients will refer Speak Up Reports they receive to Talk To Peggy for triage and investigation as appropriate. You may make your report anonymously unless prohibited under local law. If you choose to disclose your identity, Eligible Recipients will only share your identity with your consent (unless other limited exceptions apply). We explain this further below.

## ii. Other types of reports

We recognise that you may wish to raise a report which doesn't constitute a "Speak Up Report", as defined above.

If you are external to Rio Tinto, we encourage you to raise reports through Talk to Peggy (<https://app.convercent.com/en-us/LandingPage/60732c5c-fb3c-e811-80e2-000d3ab6ebad>).

If you work at Rio Tinto and have a concern you wish to raise, Rio Tinto has a number of ways in which you can do so, depending on your preferences, circumstances and the level of seriousness of the issue. In most cases, your concerns may be able to be addressed through discussions with your leader, Human Resources, Rio Tinto Legal or other functions such as Ethics & Integrity. They should be able to help assess and handle such concerns, for quick and effective resolution. If you do not feel comfortable using these channels, you can also Talk To Peggy (<https://app.convercent.com/en-us/LandingPage/60732c5c-fb3c-e811-80e2-000d3ab6ebad>).

## 2.4 What happens after we make a report?

### i. Initial handling and referrals

#### All types of reports

Recipients of all types of reports have a responsibility to ensure they are dealt with in an appropriate, proportionate and professional manner, whether they constitute Speak Up Reports or not. This can mean they share reports with other people or teams who may need to advise or help with follow-up, including Rio Tinto Legal, Data Privacy team, Human Resources, Talk To Peggy, GIFT, Security and/or the Head of Ethics & Integrity, for triage and investigation as appropriate, subject to any applicable confidentiality requirements.

All reports which are referred to Talk To Peggy will be assessed to check whether the report constitutes a Speak Up Report which should be triaged for investigation, or if it needs to be referred elsewhere for follow-up (for example to Human Resources, Rio Tinto Legal or Rio Tinto's Data Privacy team), again, subject to any applicable confidentiality requirements.

#### Speak Up Reports

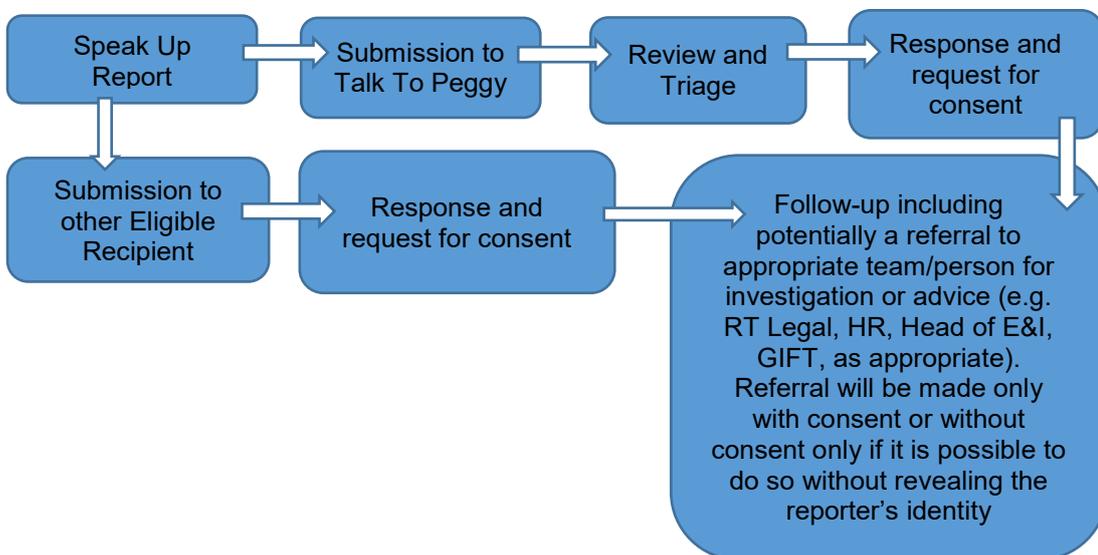
Where Speak Up Reports are received by Eligible Recipients other than Talk To Peggy, they will in most cases, and subject to any applicable confidentiality requirements, be passed by the Eligible Recipient to Case Investigators in GIFT, Talk to Peggy and/or the Head of Ethics & Integrity for triage and investigation as appropriate. They could however be referred to Case Investigators in other appropriate teams, including for example Security, Rio Tinto Legal or Human Resources. Eligible Recipients will only share a reporter's identity or information likely to identify them with their

consent unless other limited exceptions apply – see section 2.5 below. If you have made a Speak Up Report (as distinct from other types of reports) you should, therefore, expect the Eligible Recipient to contact you to ask if you consent to your identity being shared before any referral which identifies you as a reporter is made.

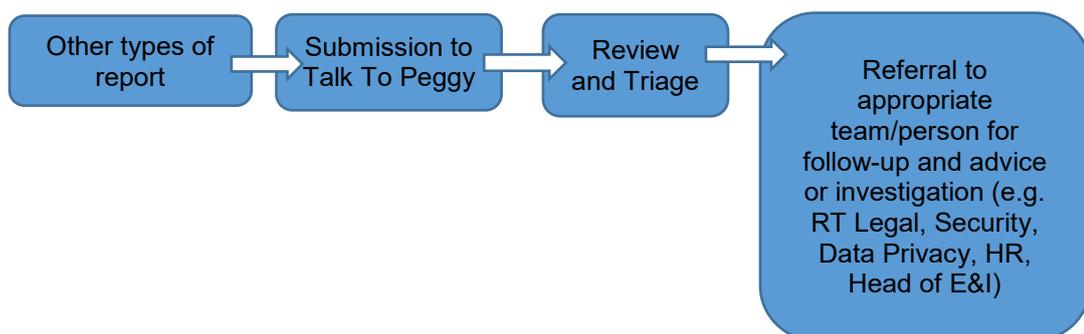
As noted above, you have the right to make a Speak Up Report anonymously. However, from a practical perspective, and depending on the nature of the concerns you have raised, the fact that you have consented to share your identity, or information likely to lead to your identification, may lead to a more thorough investigation and in some cases, it may not be possible to investigate a matter if you do not consent to your identity being shared and there is a risk that doing so would likely lead to you being identified.

**Example process flow (subject to applicable confidentiality requirements):**

*(a) Speak Up Reports*



*(b) Other types of report*



**ii. Investigations**

- (a) Where a Sponsor decides a Speak Up Report should be investigated, this will be investigated by a Case Investigator in accordance with the Investigations Procedure (available here: [https://intranet.riotinto.org/publ/ist-cprc/SiteCollectionDocuments/Investigations%20Procedure\\_FINAL4.pdf](https://intranet.riotinto.org/publ/ist-cprc/SiteCollectionDocuments/Investigations%20Procedure_FINAL4.pdf)).<sup>5</sup> If the decision

<sup>5</sup> The Investigations Procedure is overseen by Ethics & Integrity and, ultimately, the Head of Ethics & Integrity.

is made to investigate, a suitably experienced Case Investigator will be assigned to the matter raised, depending on the seriousness of the allegation. As part of this process, GIFT uses its best endeavours to identify, and if required mitigate, any actual or potential conflicts of interests that could bring into question the neutrality or independence of the investigation.

- (b) Rio Tinto expects reporters and other investigation participants, such as witnesses and subjects, to cooperate and answer questions openly, honestly and in a timely way. See the Investigations Procedure for further detail.
- (c) All investigations will be undertaken in a fair and respectful manner, in accordance with applicable laws and the investigations principles. See the Investigations Procedure for further detail.
- (d) Principles of confidentiality, impartiality and objectivity, integrity, competence and consistency, protection from retaliation and timeliness apply in relation to all those involved, including witnesses and subjects of reports. Any employee alleged to be involved in conduct that is the subject of a report will be afforded an opportunity to respond to the allegations as and when required by principles of procedural fairness.
- (e) The timeframe for an investigation will vary depending on the nature of the report. Case Investigators will provide reporters with regular updates as to the investigation status (including in relation to timeframes) if they are able to be contacted, and encourage reporters to check back with the Case Investigator whilst their concerns are investigated. This provides the Case Investigator with an opportunity to share relevant updates (to the extent appropriate to do so), but also provides the reporter with an opportunity to highlight any concerns they may have since making their report, including any concerns they may have around potential detriment. The frequency and timeframe of updates may vary depending on the nature of the disclosure.
- (f) On closure of the matter, and assuming the reporter has provided contact details, the reporter may, as appropriate in Rio Tinto's discretion, be informed of the outcome of the investigation (for example, whether Rio Tinto has established that the concerns are substantiated or not). Full details of the outcome may not always be available for reasons related to confidentiality, legal professional privilege, privacy and the legal rights of those concerned. The method for documenting and reporting the findings of an investigation will depend on the nature of the report. If an investigation report is prepared, this will be the property of Rio Tinto.
- (g) Generally, the information that may be shared with reporters or others involved in an investigation (including around findings or outcomes) may be limited, to protect the interests of all those involved.

## **2.5 Protection and support**

Rio Tinto is committed to ensuring that all reporters are treated with respect and protected from detriment (including retaliation, dismissal, demotion or other harm or threats) as a result of making a report. This is the case whether the matter reported is a Speak Up Report or not.<sup>6</sup>

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<sup>6</sup> Rio Tinto will, however, at all times be able to raise and address with a reporter, matters that arise in the ordinary course of their employment or contractual relationship with Rio Tinto where relevant (for example, any separate misconduct or performance concerns), or take appropriate action to protect a reporter, and this will not amount to detrimental conduct.

Speak Up Reports made to the Eligible Recipients listed in section 2.3(ii) above, will qualify for the specific protections set out below.

**i. Protection against detriment**

Rio Tinto will not tolerate any actual or threatened victimisation or detriment against a person because they, or someone else, has made, or proposed to make a Speak Up Report, or because someone suspects that person or another person has made, may make, or could make a Speak Up Report, or is investigating such a report. Examples of detrimental treatment include dismissal, demotion, harassment, discrimination, disciplinary action, harm or injury (including threats), damage to reputation or other unfavourable treatment as a result of making a Speak Up Report.<sup>7</sup>

If you have made a Speak Up Report and you have, or reasonably suspect that you have, been subjected to detrimental treatment as a result, this in turn constitutes a new Speak Up Report which you may report to any Eligible Recipient in line with the process set out above. Rio Tinto also encourages you to inform the Case Investigator assigned to the original investigation if you know who this is.

If reported to Talk To Peggy, a report of retaliation will be triaged in accordance with the Investigations Procedure and may be identified as a serious wrongdoing, with a Case Investigator from GIFT being assigned to investigate as appropriate. If substantiated, the report may result in disciplinary action, including dismissal.

Protection from detriment and confidentiality are both important considerations when it comes to the planning and conduct of investigations into Speak Up Reports. This includes, but is not limited to, the Case Investigator giving consideration to the time and location of any meetings or interviews (and if necessary, conducting these outside of work hours and in discrete locations), and the method of communications (for example, telephone may be preferable to email).

Rio Tinto may in its discretion offer further specific measures to protect reporters, and others involved in investigations, from retaliation and detriment. The nature of these will depend on the particular circumstances and nature and level of potential detriment involved, but could include involving Security as appropriate. Rio Tinto may in its discretion, where appropriate, monitor and manage the behaviour of other employees, make support services available, or allow a person to perform their duties from another location.

Depending on the applicable laws, a reporter may also be entitled to the following legal protections:

- (a) Protection from civil, criminal or administrative legal action; and
- (b) In some circumstances, protection from having to give evidence in legal proceedings.

If a reporter, or any other person, suffers loss, damage or injury as a result of making a Speak Up Report and Rio Tinto has failed to take reasonable precautions and exercise due diligence to prevent that detriment, a reporter may, subject to applicable laws, also be entitled to compensation and other legal remedies.<sup>8</sup>

**ii. Protection of a reporter's identity and confidentiality**

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<sup>7</sup> But please note footnote 6 above.

<sup>8</sup> For reports arising in connection with Rio Tinto's Australian operations, or the operations of its Australian incorporated entities, such compensation and remedies are, in appropriate cases, available under the Australian Corporations Act. None of these protections will shield a reporter from the consequences of any of their own wrongdoing revealed by their report.

As noted above, reports, including Speak Up Reports, may be made anonymously unless prohibited under local laws.<sup>9</sup> A reporter can also choose to remain anonymous over the course of any investigation and after an investigation is finalised. As part of this, they can decline to answer any questions they feel could reveal their identity at any time.

All information received from a reporter, including a reporter of a Speak Up Report, will be treated confidentially. This means that the report and related information will only be shared with a limited number of people on a need to know basis, subject to applicable legal requirements.

A reporter's identity or information from a Speak Up Report which would be likely to identify the reporter, will only be shared:

- with the reporter's consent;
- where there is a legal obligation to share this information, including with certain regulators or law enforcement agencies, or where the disclosure is otherwise allowed by law;<sup>10</sup> or
- with a legal practitioner in order to obtain legal advice.

Information that may lead to a reporter of a Speak Up Report being identified may need to be shared without a reporter's consent where this is reasonably necessary for an investigation, provided that a reporter's identity is not revealed. In these circumstances, Rio Tinto will take all reasonable steps to reduce the risk that a reporter is otherwise identified. Such steps include:

- carefully reviewing and potentially de-identifying the allegations or concerns to reduce the risk of the reporter being identified, and
- keeping the information pertaining to the report confidential and only disclosing to those who have a need to know.

If a reporter believes or suspects there has been a breach of their confidentiality, this should be raised with the investigator (if known to the reporter), or reported to Talk To Peggy (with an explanation of what the reporter believes has occurred, to enable investigation as appropriate).

### **iii. Protection of files and records related to Speak Up Reports**

All files and records created from an investigation into a Speak Up Report must be retained securely, in accordance with all applicable laws, and should only be accessible by those directly involved in conducting and managing the investigation. Release of information to someone not involved in the investigation (other than senior managers or officers who have a need to know, for example so that they can take appropriate action, or for corporate governance purposes) is unauthorised and will be a breach of this Procedure.

Information may be released if required by law, or at the request of a law enforcement authority in appropriate circumstances, or if the release is made for the purposes of seeking legal advice.

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<sup>9</sup>For reports arising in connection with Rio Tinto's Australian operations, or the operations of its Australian incorporated entities, reports that are made anonymously will still attract protections under the Australian Corporations Act.

<sup>10</sup> For reports arising in connection with Rio Tinto's Australian operations, or the operations of its Australian incorporated entities, your identity (or information that would likely disclose your identity) may be disclosed under the Australian Corporations Act without your consent to Australian Securities and Investments Commission, the Australian Prudential Regulatory Authority, or the Australian Federal Police, the Australian Taxation Office with respect to tax-related misconduct, or to a legal practitioner for the purpose of obtaining legal advice or representation in relation to the operation of Australia's whistleblower laws. It is illegal for a person to identify you, or disclose information that would likely identify you (subject to the limited exception referred to at section 2.5(ii) above), without your consent and outside these exceptions, for disclosures that qualify for protection under the Australian Corporations Act.

## Section 3: Roles and Responsibilities

Role	Responsibility
<b>Case Investigators</b>	Responsible for investigating reports in accordance with the standards and protections set out in this Procedure and the Investigations Procedure.
<b>Eligible Recipients</b>	Responsible for receiving Speak Up Reports and for handling such reports in accordance with this Procedure.
<b>Ethics &amp; Integrity</b>	Day-to-day operational responsibility for this Procedure, and for ensuring that employees receive training about this Procedure and their rights and obligations under it.
<b>Head of Ethics &amp; Integrity</b>	<p>Overall responsibility for this Procedure, and for reviewing this Procedure periodically to ensure it is operating effectively and whether any changes are required to the Procedure (including having regard to the effectiveness of actions taken in response to reports).</p> <p>The Head of Ethics &amp; Integrity also has responsibilities as an <b>Eligible Recipient</b>, and will be the investigation <b>Sponsor</b> for Speak Up Reports referred to the Head of Ethics &amp; Integrity, Talk To Peggy or GIFT.</p> <p>The Head of Ethics &amp; Integrity may, in relation to any of the discretions vested in them under this Procedure, appoint another member of the Ethics &amp; Integrity team to act in their place if they are for any reason unavailable.</p>
<b>Rio Tinto Board</b>	Responsibility for oversight of the whistleblowing programme and will receive summary information in relation to concerns raised under this Procedure on a periodic basis, including metrics on disclosures made. The Board may also be provided with additional information about any material incidents raised. Information received by the Board will have the identities of those concerned concealed.
<b>Sponsors</b>	As per the investigations procedure, responsible for deciding whether it is possible and/or appropriate to investigate a Speak Up Report. This will be the Head of Ethics & Integrity where the Speak Up Report is referred to the Head of Ethics & Integrity, Talk To Peggy or GIFT.

## Section 4: Where to find this Procedure

This Procedure will be made available:

- (a) On the website of Rio Tinto's confidential and independently operated whistleblowing service, Talk To Peggy (<https://app.convercent.com/en-us/LandingPage/60732c5c-fb3c-e811-80e2-000d3ab6ebad>) / ([www.talktopeggy.com](http://www.talktopeggy.com))
- (b) Online, here: <http://www.riotinto.com/ourcommitment/publications-policies-10273.aspx>, and
- (c) On Rio Tinto's intranet here: [https://myprospect.riotinto.org/en/whoweare/policy\\_hub](https://myprospect.riotinto.org/en/whoweare/policy_hub)

Rio Tinto reserves the right to vary, replace or terminate this Procedure from time to time and at any time in its discretion.

## Appendix

### Definitions

**Case Investigators** are explained in Section 3 above and the Investigations Procedure. They are the persons assigned to investigate a report and are responsible for investigating reports in accordance with the standards and protections set out in this Procedure and the Investigations Procedure.

**Contractor** means a person who is not a Rio Tinto employee, who is an employee of a supplier engaged through a contract between Rio Tinto and the supplier to perform work at Rio Tinto operations or projects for a specified length or time or for a specified activity. It includes Category 1, 2 or 3 contractors.

**Eligible Recipients** means:

- Talk to Peggy (<https://app.convercent.com/en-us/LandingPage/60732c5c-fb3c-e811-80e2-000d3ab6ebad>);
- Head of Ethics & Integrity;
- A board director or board secretary of an Eligible Rio Tinto Entity;
- A senior manager, i.e. a senior leader in Band A-E of an Eligible Rio Tinto Entity, or
- An internal or external auditor (including a member of an audit team conducting an audit), or an actuary, of an Eligible Rio Tinto Entity.

**Eligible Rio Tinto Entity** means Rio Tinto plc, Rio Tinto Limited and any Rio Tinto Entity with operations in Australia or another connection with Australia (including subsidiaries and holding companies of Rio Tinto Entities incorporated in Australia or which have operations in Australia).

**GIFT** means Rio Tinto's Group Investigations and Forensics Technology team.

**Rio Tinto** includes Rio Tinto plc, Rio Tinto Limited and any Rio Tinto Entity.

**Rio Tinto Entity** means any business which is directly or indirectly wholly or majority owned, managed, or controlled by Rio Tinto plc or Rio Tinto Limited.

**Speak Up Report** means a report of a reasonable suspicion of misconduct or improper circumstances or behaviours affecting Rio Tinto people or our business. Speak Up Reports can include, but are not limited to, concerns about suspected or actual illegality, human rights abuses, workplace health, safety, environmental, or security violations, financial reporting failures, fraud, violations of Rio Tinto's policies and procedures (including this Procedure), or business integrity issues in general.

Speak Up Reports made to an Eligible Recipient will qualify for specific protections set out in this Procedure.

**Sponsors** are explained in Section 3 above and in the Investigations Procedure. They are responsible for deciding whether it is possible and/or appropriate to investigate a Speak Up Report.

**Talk To Peggy** is Rio Tinto's confidential and independently operated multilingual whistleblowing service. Talk To Peggy operates globally with call takers available for translation in more than 40 languages. It operates 24 hours a day, 7 days a week.