



# **Whistleblower Protection Policy**

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**Redwood Corporate Policy**

## Why this Policy?

Redwood requires directors, officers, managers, employees, representatives, agents and/or contractors to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Redwood, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

## Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Redwood can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees, representatives, agents and/or contractors to report concerns about violations of Redwood's Code of Conduct or Policies or suspected violations of law or regulations that govern Redwood's operations.

## No Retaliation

It is contrary to the values of Redwood for anyone to retaliate against any board member, officer, manager, employee or external person who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, suspected fraud, or suspected violation of any regulation governing the operations of Redwood. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

## Reporting Procedure

Redwood has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their line manager. If you are not comfortable speaking with your manager or you are not satisfied with your manager's response, you are encouraged to speak with other managers or your country or regional VP. Managers and VP's are required to report complaints or concerns about suspected ethical and legal violations in writing to Redwood's Compliance Officer, who has the responsibility to investigate all reported complaints.

Employees with concerns or complaints may also submit their concerns in writing directly to their manager, the regional VP or Redwood's Compliance Officer.

## **Whistleblower Committee**

Redwood's Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer heads the Whistleblower Committee, in which the complaints are discussed to ensure independent decisions and a four-eyes principle. In severe cases the Whistleblower Committee may decide to use external resources to investigate complaints. After thorough investigation, the Compliance Officer will report the findings back to the individual who reported it (in case this person is known). The Compliance Officer will also advise the Executive team of all complaints and their resolution and will report at least annually to the Corporate Controller on compliance activity relating to accounting or alleged financial improprieties.

## **Accounting and Auditing Matters**

Redwood's Compliance Officer shall immediately notify the Corporate Controller of any concerns or complaints regarding corporate accounting practices, internal controls or auditing and work with the Whistleblower Committee until the matter is resolved.

## **Acting in Good Faith**

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

## **Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

## Handling of Reported Violations

Managers who receive complaints from employees are required to promptly report these to the Whistleblower Committee. The manager should check with the employee if they should do so anonymously or not and respect that choice. Redwood's Whistleblower Committee will notify the person who submitted a complaint (this can be the manager who reported the anonymous complaint) and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. The outcome of such investigation will be communicated back to the reporter of the complaint.

Please send your complaint or any question regarding this policy to:

**[whistleblower@redwood.com](mailto:whistleblower@redwood.com)**



[whistleblower@redwood.com](mailto:whistleblower@redwood.com)

<http://www.redwood.com>

USA: +1 919 460 5400, 888 425 2235 (Toll Free)

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Redwood reserves the right to singlehandedly make changes to this policy at any time.

**REDWOOD**