

Whistle Blower policy:

Reasonable care should be taken in dealing with suspected misconduct to avoid:

- Baseless allegations.
- Premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation.
- Violations of a person's rights under law.

Accordingly, a manager or supervisor faced with a suspected misconduct:

- Should not contact the person suspected to further investigate the matter or demand restitution.
- Should not discuss the case with anyone other than the President and CEO, the Chairman of the Board of Directors, the General Counsel, or a duly authorized law enforcement officer.
- Should direct all inquiries from any attorney retained by the suspected individual to the General Counsel.
- Should direct all inquiries from the media to the President and CEO.

Whistleblower Protection

RT will protect whistleblowers as provided below.

- RT will use best efforts to protect whistleblowers against retaliation, as described below, although it cannot guarantee confidentiality. RT will keep the whistleblower's identity confidential, unless (1) the person agrees to be identified; (2) identification is necessary to allow RT or law enforcement officials to investigate or respond effectively to the report; (3) identification is required by law; or (4) the person accused of Fraud Policy violations is entitled to the information as a matter of legal right in disciplinary proceedings.
- RT employees may not retaliate against a whistleblower with the intent or effect of adversely affecting the terms or conditions of employment (including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or wages). Whistleblowers who believe that they have been retaliated against may file a written complaint with the President and CEO or Chairman of the Board of Directors. A proven complaint of retaliation shall result in a proper remedy for the person harmed and the initiation of disciplinary action, up to and including dismissal, against the retaliating person. This protection from retaliation is not intended to prohibit managers or supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.
- Whistleblowers must be cautious to avoid baseless allegations and anonymous allegations are discouraged so that there can be appropriate follow-up questions and investigation which may not be possible unless the source of the information is identified.