

# A direct line to the top



The popular press may call it whistleblowing, but in a Group such as Rio Tinto, it's a key outlet for employee concerns. Helen Plummer reports.

**The posters pull no punches. They invite callers to get in touch if they have a concern about serious issues and inappropriate behaviour at work that they don't feel able to discuss with management on site. There is a phone number of a hotline – open 24/7, 365 days a year. A call is free of charge to the caller from any fixed land phone line.**

There is an undertaking that every call will be examined by senior management and investigated where appropriate. Callers are allotted a reference number which allows them to ring back at any time to check on progress with their issue. There is the promise that the operator will have a progress report available within three business days. And this is truly a global service, with interpreters on call within minutes.

Welcome to *Speak-OUT*, Rio Tinto's whistleblowing programme, relaunched earlier this year by the Group's Compliance team (in some of Rio Tinto's French speaking operations, the programme is called *Exprimez-vous*). It is, of course, a legal requirement for any corporation to provide some sort of channel of communication for employees to pass on anything untoward in terms of financial proprieties. Yet according to Neville Tiffen, global head of Compliance at Rio Tinto, *Speak-OUT* is designed "to go further than that", covering not just issues of fraud, but conflicts of interest, discrimination, harassment, violence, health, safety or environment concerns and legal or policy violations.

The service is not even limited to these subjects and no

call will be refused. There are assurances of confidentiality and anonymity, if preferred. Some countries, however, impose limits on company hotlines and in those countries *Speak-OUT* is managed in accordance with local requirements. Neville emphasises that, in the usual course, an employee should first talk to their manager or site HR personnel or use formal internal grievances mechanisms, but when they may not be comfortable using those means, the *Speak-OUT* reporting route provides employees with an alternative means of raising concerns to senior management. Each month the Group chief executive sees a summary of all calls made to *Speak-OUT*.

Before the relaunch, the effectiveness of *Speak-OUT* was examined carefully. "Early in 2009, Rio Tinto Compliance formally took ownership of the programme, which had been running since 2004," says Neville. "So we took a long hard look at it and did some benchmarking to see how the service was being used and how it stacked up against other businesses.

"We found that we received a higher rate of calls than the rest of the mining sector, but were on a par with all sectors." He stresses that this didn't set any alarm bells ringing – it was not an indication of an unethical corporate culture at Rio Tinto. Instead, Neville believes it demonstrates that *Speak-OUT* is well known throughout the Group, that employees acknowledge its integrity and are generally willing to use the service. In practice, some two thirds of the calls logged are human resources related. When Compliance analyses the *Speak-OUT*

## Spreading the word

With compliance so much a part of everyday working life, it has been crucial for its messages to be incorporated into Rio Tinto's own code of corporate conduct – a canonical document called *The way we work* – which sets out the standards of behaviour expected across the Group. This statement has been updated and relaunched this year, its third edition, by the Human Resources and Internal Communications teams. Available as a booklet and as an online training programme, *The way we work* is given to everyone working within Rio Tinto, with compulsory refresher training every two years.

programme, it also looks at the broader cultural and awareness picture throughout the Group.

"*Speak-OUT* is recognised throughout the organisation as a good safety valve," he comments. "It is an important tool that ensures the reputation of all Rio Tinto businesses remains high with all stakeholders – present and future employees, neighbouring communities and business partners."

Nonetheless, a review was necessary to increase awareness further. In particular, the integration with Alcan meant that there were a number of sites that needed to implement the programme. "It was a good time to revitalise *Speak-OUT*," says Neville. "As you can imagine we have to comply with a wide range of legal jurisdictions across the globe and these need to be kept under constant review. We also revised the procedures and rethought the categories we assign to the calls, to improve monitoring." Whilst there have been many improvements to the programme already, it is kept under constant review and there will be ongoing improvements over coming months.

Work on raising the profile of the service has involved revamped publicity material (the workplace poster is supported by wallet cards and brochures), verbal presentations by management around the Group and a website. Information about *Speak-OUT* is now always included in employment offers and induction packs for new employees. Each Rio Tinto site has a designated *Speak-OUT* co-ordinator at management level

responsible for passing out information on the service.

Running such a programme across different territories calls for cultural and geographical adaptation. Neville explains: "In some parts of the world where we operate, say for example, in Guinea, the telephone system is just not geared up to the use of a 24 hour hotline. So there we have a letter drop box system for access to *Speak-OUT*."

Most calls, however, come from first world countries, although Neville says that this may be less to do with infrastructure and more a cultural issue. Fewer calls come from Europe, where EU/EEA privacy laws restrict the way *Speak-OUT* operates and limits are placed on the topics that can be raised in a call. "The simple message to employees is that senior management wants to know about serious issues, either through traditional means or through *Speak-OUT*," Neville says.

The Compliance team is a small unit of five specialists, with Neville based in Rio Tinto's Melbourne office. The Compliance department was formally established in 2001 with the remit of compliance risk assessments and establishing systems directed at preventing or detecting violations of law, regulation or Rio Tinto policy. Its role has been "beefed up gradually" according to Neville, in response to the growing importance of compliance in corporate life.

"The external landscape has changed so much," he says. "Companies have to be robust in having an ethical and legally compliant approach in everything that they do. I see my function as being able to assure the board and senior management that we have that culture in place – at Rio Tinto, we conduct our business with integrity."

Given the spread of Rio Tinto's business, it is challenging having a global approach to compliance. Legal requirements clearly vary across boundaries. In practice, Neville believes this simply raises the bar. "You have to adopt an approach that may be higher than that required in any given territory," he explains. "Then that, *de facto*, becomes the bottom line for everyone across the Group. Obviously, it is important for us to be sympathetic to different cultural values and approaches and to that end we are consulting widely around the Group."

As the rigorous overhaul of the Compliance function's remit continues, Neville concludes: "I want to continue to build an approach to compliance that means that all of us at Rio Tinto can look our stakeholders in the eye knowing we have in place a culture that gives true regard to business integrity and the law."

Find out more at [www.riotinto.com/our-approach/17216\\_internal\\_controls.asp](http://www.riotinto.com/our-approach/17216_internal_controls.asp)

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