

Via electronic submission: www.parliament.wa.gov.au

Inquiry into Sexual Harassment Against Women in the FIFO Mining Industry

Dear Committee Chairperson and Members,

1.0 Basis of Submission

This Submission defines sexual misconduct as including all workplace related:

1. Unlawful sexual discrimination; and
2. Unlawful sexual harassment; and
3. Criminal sexual assault.

This Submission is drawn entirely from contemporaneous evidence that I have reconciled over the past 18 months. That evidence can be provided to the Committee to substantiate this Submission and I am available to provide Oral Submissions.

I am confident this Submission provides an accurate summary of the sexual misconduct that my family encountered in the Western Australian (WA) mining industry and specifically, from Rio Tinto Ltd (RTL).

This Submission testifies to each of the Inquiry Terms of Reference and the following specific issues:

1. Sexual misconduct is not limited to spontaneous or ad hoc misconduct. Sexual misconduct is used strategically, meaning the misconduct is planned, instructed and sanctioned by one or more Corporate Officers as part of a strategy to extort
2. When sexual harassment is left unchecked, it evolves into sexual assault
3. Victims of sexual misconduct cannot reasonably access protections or justice, even if the misconduct is reported immediately. This is in part because:
 - A) The burden of classifying workplace sexual misconduct, and then identifying the appropriate private and public agencies to whom to report the misconduct, effectively rests with victims. Given the complexity of private, regulatory, government and political frameworks, that burden is too great
 - B) Even when victims have the resilience to navigate the above complexity, their reports of sexual misconduct are too often and too easily dismissed by the private and public agencies whose job it is, in whole or in part, to protect them
4. When access to civil litigation is not equal, perfectly equal, civil litigation is no longer a pillar of justice, it is a weapon of oppression. Victims and mining corporations do not have equal access to civil litigation. Indeed, their access could not be more polarised.

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5. In the absence of protections and justice, the only way victims can begin to regain their power is by speaking their truth. Yet now more than ever, that most fundamental human right is thwarted with civil litigation risk, for both victims and journalists. In stark contrast, any person, including those in positions of public influence, can knowingly broadcast, publish and distribute false health advice, without legal consequence, even during a pandemic.

2.0 Recommendations

My family respectfully requests the Committee consider all recommendations necessary to ensure:

1. Equal, or at least appropriate, accountability and penalties for Corporate Officers that plan, instruct or sanction sexual misconduct
2. Reasonable and timely access to sexual misconduct protections and justice, including for example:
 - A) A single gateway and triage function for victims
 - B) Improved accountability for private and public agencies whose job it is, in whole or in part, to effect protections and justice. That might include for example, a regulatory onus on Counsels, whether sexual misconduct specialists or not, to disclose to the recipients of their advice if they suspect sexual misconduct has occurred.
3. Regulatory limits on the resources that corporations can allocate to civil litigation to no more than that reasonably available to their victims
4. A regulatory framework that permits journalists to broadcast or publish, in the minimum, the names of corporations and generic job titles involved in credible allegations of sexual misconduct, without civil litigation risk.

3.0 Background

From 1993 until 2008, I undertook a successful career in corporate risk management, including as Senior Manager, Shareholder Value, ANZ Bank Ltd and as Managing Director, Asia-Pacific, Kamakura Corporation Inc.

In 2008, I co-founded and launched RePipe Pty Ltd (RePipe) together with my sister, [REDACTED] and my brother-in-law, [REDACTED]. RePipe is a small plumbing and civil contracting business.

Amongst its many innovations, RePipe commercialised patented keyhole technologies that eliminate up to 95% of the excavations normally required to replace or upsize underground pipes (pipebursting).

In May 2010, RTL first engaged RePipe for its pipebursting services. From the outset, RTL repeatedly advised that RePipe was “completely unmatched” across safety, cost, timeliness and quality. Over the following years, the relationship between RTL and RePipe expanded into all plumbing and civil services.

By November 2013, based entirely on encouragement from RTL, RePipe relocated its business from Perth to Karratha. From that time, the majority of RePipe’s revenue relied on RTL acting reasonably. RePipe managed that concentration risk by delivering extraordinary service to RTL (summarised in Attachment A).

By the end of March 2014, the value of Purchase Orders (POs) that RTL issued to RePipe had increased 369% on the previous year.

4.0 Non-Sexual Misconduct

In April 2014, RePipe received reports that an RTL Manager was distributing copies of RePipe's confidential and proprietary information to enable other contractors to more effectively compete against RePipe. RePipe immediately reported that misconduct to RTL, however:

1. The only reply that RePipe received was an abusive telephone call from the accused RTL Manager's supervisor
2. By the end of March 2015, the value of POs that RTL issued to RePipe had fallen 66%.

Regardless, RePipe navigated around that misconduct by establishing excellent working relationships with hundreds of RTL Field Operators, Supervisors and Superintendents across multiple RTL business units and sites.

5.0 rerisk® Software and Patent Applications

In March 2015, RePipe lodged patent applications on more than 100 inventions within workplace safety software (rerisk®) developed and owned by RePipe. From the outset, RePipe intended to offer rerisk® to all Employers, ideally through global software distributors to speed accident prevention.

Progress of the rerisk® patent applications, international awards and industry feedback evidence that rerisk® is the first software of its kind and therefore, very valuable. As an indication of value, the United Nations International Labor Organization reports that globally:

1. An average of 2.3million people die from workplace accidents and illnesses every year. In comparison, 1.9million people died from COVID in 2020
2. The annual cost of workplace deaths and injuries is US\$313trillion, excluding Employer investments in prevention systems and of course, excluding immeasurable social costs.

RTL was aware of rerisk® because:

1. As required, the rerisk® patent applications were made publicly available, including instructions to build the rerisk® software. It was therefore vital that RePipe remained able to fund the substantial and ongoing patent legal costs as well as software development and testing costs
2. RePipe immediately began engaging with RTL Managers, Executives and Managing Directors to encourage RTL to trial rerisk®. Those RTL Managers, Executives and Managing Directors repeatedly conceded that rerisk® was "the best in the world" and "much further up the curve than anyone else in the world."

Regardless, RePipe later learned that RTL was undertaking a project to build software like rerisk® and, despite apparently substantial investment, that project was failing. The RTL Managing Director (MD1) responsible for that project was also the most senior RTL Employee able to directly influence the value of POs issued to RePipe.

6.0 Escalating Non-Sexual Misconduct

From April 2015, RePipe encountered escalating, non-sexual misconduct from an increasing number of RTL Managers and Executives. That misconduct involved daily efforts to:

1. Damage the reputations of RePipe and me personally, including repeated and false assertions RTL "had proven" that RePipe and me were dishonest, misleading, not transparent and uncompetitive
2. Interfere with RePipe's contracts and relationships with its Employees, Suppliers and Clients
3. Cause financial harm, including:

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- A) Withdrawing an offer to execute a five-year contract and instead, repeatedly re-tendering the contract, as often as every three months. Ultimately, RTL refused to advise re-tender outcomes, despite requests from RePipe and other RTL Employees
 - B) Excluding RePipe from quoting projects, including projects for which RePipe's pipebursting services would have substantially reduced costs and risks whilst improving quality outcomes
 - C) Corrupting the award of contracts and falsely asserting that their failure to reconcile any competitor costs involved "no impropriety" based on "how many times the tender had been elevated for approval"
 - D) Acting contrary to RTL contract terms, including:
 - i. Insisting RePipe mobilise prior to all commercial terms being agreed, despite RePipe's objections, and then refusing to pay costs clearly disclosed in RePipe's tender
 - ii. Extending RePipe's payment terms, without notice, from 14 days to up to 76 days
 - iii. Delaying payments by up to 56 days past due.
 - E) Repeatedly threatening to terminate RePipe's relationship with RTL.

7.0 Sexual Misconduct

7.1 Discrimination and Harassment

Over time, despite RePipe escalating its misconduct reports to RTL Executives, the misconduct expanded to include sexual harassment against me and my family. For example, under instruction from an RTL Executive, a male RTL Employee accessed RePipe's private and locked premises, without RePipe's knowledge or attendance. The sole objective of his access was to inspect my bedroom as part of a failed attempt by RTL to prove that I did not live locally and then disqualify RePipe as a Local Provider.

By 3 October 2018, the misconduct had become so disturbing, and the financial, physical and mental harm so acute, it caused me to email an RTL Executive and MD1. In that email:

1. I described RTL's misconduct as "*potentially illegal*" and "*a coordinated effort to bully RePipe into bankruptcy and to cause RePipe's stakeholders (including myself and my family) extraordinary financial loss and indescribable stress*"
2. I requested "*an investigation by RTIO Legal*" including "*hearing and reviewing documented evidence to be provided by RePipe*".

MD1 confirmed by reply email that RTL Ethics and Integrity "*will do a full independent investigation. I will also check in with compliance and ask to be updated on progress.*"

Despite that advice, the sexual misconduct immediately intensified. Specifically, RTL Managers:

1. Undertook stalking and similar efforts within our community to source private and confidential information about:
 - A) My personal relationship with my husband and ██████'s personal relationship with ██████
 - B) My health and medical conditions.
2. Falsely asserted that a recent marriage separation between ██████ and ██████ would disqualify RePipe as a Local Provider.

By 15 October 2018, in reply to my email request for an update on investigation progress, RTL Executives and MD1 advised that *“our compliance team will commence reviewing the documentation and the investigation this week.”*

On 17 October 2018, in reply to my email advice that the misconduct was by then preventing RePipe from delivering works *“safely and efficiently”* RTL Executives and MD1:

1. Advised that *“This seems to be a commercial matter rather than a compliance matter”*
2. Refused my request to confirm that RePipe would be paid in accordance with RTL contract terms
3. Also refused my alternative request to temporarily stand-down RePipe’s works pending RTL’s investigation outcomes.

On 29 October 2018, I received a telephone call from an RTL Executive (E1) who introduced himself by his first name only. Despite my requests, E1 refused to disclose his surname. During that discussion:

1. E1 purported to be the *“Asia-Pacific Head of Compliance for Rio”* and advised that RTL was *“just about to start”* its investigation of RePipe’s complaints
2. E1 then advised he would revert within two weeks and I reiterated RePipe’s willingness to provide its documentary evidence.

On 29 November 2018, having received no further advice, I searched on-line to identify E1 and then emailed him to request an update on his investigation.

On 6 December 2018, E1 sent me an email containing false information about what I had said to him during our telephone discussion on 29 October 2018 regarding RePipe’s willingness to provide its documentary evidence. I replied to E1 confirming what I had actually said and listed multiple previous emails that clearly evidenced RePipe’s enthusiasm to provide its documentary evidence.

On 21 December 2018, without having requested RePipe’s documentary evidence, E1 emailed me as follows:

“In response to the allegations received from you on or about the 3rd October 2018 I can confirm the following:

A thorough investigation was undertaken which included interviewing a significant number of people, reviewing tender documents and conducting reviews of Rio Tinto policies and procedures. The investigation is complete with findings being determined.

I have briefed [MD1] of the investigation outcomes and would like to discuss these with you when you have time.”

On 24 December 2018, during a two-hour telephone discussion with E1 about his investigation outcomes:

1. E1 advised that his investigation had concluded:
 - A) No RTL Employee had breached any RTL policy
 - B) Based on his interviews of the accused RTL Employees, *“the only problem”* he had identified is that I am *“intimidating”*, *“dominating”* and *“a bully”* (the accusations).
2. E1 then repeatedly refused to receive or review RePipe’s documentary evidence because, he said, the accusations *“could not be ignored”* and held greater evidentiary weight than any documentary evidence RePipe could provide

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3. E1 repeatedly “recommended” and then “strongly recommended” that I stop insisting RTL review RePipe’s documentary evidence because further investigation would cause RTL to “shut up shop to RePipe” and result in the accusations about me “becoming public knowledge”
 4. Finally, E1 advised that “The only option Rio Tinto’s willing to offer RePipe now is a meeting between yourself and the people you’ve accused so you can reset the relationships you’ve so seriously damaged by your character and actions”.

Upon completion of the above telephone discussion, RePipe immediately set about engaging Counsel and alerting regulatory and government agencies. Pending legal advice, RePipe disengaged from E1.

7.2 Sexual Assault

On 13 January 2019, after a short holiday, my family returned to Karratha, except ██████ who lived in Perth with her two teenage daughters.

On the night of 18 January 2019, one of the accused RTL Managers approached ██████ while she was attending a friend’s birthday celebration at the Crown Casino in Burswood (Burswood Casino Events).

We’re unable to explain how the RTL Manager knew that ██████ was my sister. ██████ had never previously spoken to, or engaged with, any RTL Employees. We’re also unable to explain how the RTL Manager knew that ██████ was at the Burswood Casino. ██████ had arranged her attendance by private message and the RTL Manager was not invited to the birthday celebration or known by any attendees.

During his approach:

1. The RTL Manager spent more than 5 hours purporting to be someone other than himself
2. To reinforce his false identity, the RTL Manager pretended to be romantically interested in ██████. Given he obtained ██████’s consent by deceit, all his sexual contact was sexual assault
3. On several occasions, other men high-fived the RTL Manager whilst passing him with their backs turned to ██████. Upon ██████ inquiring, the RTL Manager obfuscated and did not disclose the identity of those men
4. Without prompting, the RTL Manager told ██████ that he had previously worked at ██████ School. At that time, another one of my sisters worked at ██████ School
5. The RTL Manager increasingly undertook efforts to elicit private and confidential information about RePipe and my family. He then told ██████ that he “already knew” where she lived
6. Upon ██████ becoming suspicious and challenging his identity, the RTL Manager repeatedly reiterated his false identity and then flatly denied his true identity
7. The RTL Manager then threatened ██████ and told her to repeat those threats to me by saying to her “We’ve already told Jaqui all of this but she’s not listening.”

On 21 January 2019, the RTL Manager telephoned me. During that discussion, the RTL Manager admitted the Burswood Casino Events and justified his actions by saying “We’re all allowed to have some fun.” He then offered RePipe a large contract, without contest, in exchange for RePipe’s silence, and he confirmed that corrupt offer had been ratified by his supervisor.

It is apparent from the details of ██████’s sexual assault that it was not spontaneous or ad hoc. It was planned, instructed, executed and sanctioned with the specific intention of terrorising my family. I cannot overstate the shock, fear and harm that ██████’s sexual assault caused my family.

8.0 Access to Protections and Justice

8.1 RTL Legal

On 22 March 2019, RePipe's Legal Counsel sent a letter to RTL Legal (RTL Letter). In short, the RTL Letter:

1. Briefly described some of the misconduct RePipe had encountered
2. Noted some of RePipe's written requests for investigation by RTL, including the requests to MD1
3. Summarised the nature and outcomes of E1's investigation, including his repeated refusals to receive RePipe's documentary evidence
4. Summarised the Burswood Casino Events, including the RTL Manager's use of a false identity
5. Stated that RePipe was assessing whether it was entitled to bring a claim for damages pursuant to Australian Consumer Law and specifically, unconscionable conduct provisions
6. Noted that RePipe valued its relationship with RTL and requested a meeting.

On 2 April 2019, RTL Legal replied (RTL Reply). In short, the RTL Reply:

1. Denied all allegations
2. Falsely asserted that RePipe first "*intimated*" it had documentary evidence during the telephone discussion with E1 on 24 December 2018
3. Instructed RePipe provide its documentary evidence to E1 within 10 days to "*facilitate a direct engagement*" between E1 and RePipe.

I consider the RTL Reply inadequate because:

1. RTL Legal failed to consider, or chose to ignore, numerous emails that clearly demonstrated RePipe's enthusiasm to provide its documentary evidence before and during E1's investigation
2. RTL Legal was unfairly leveraging its knowledge of, and direct control over, RePipe's financial capacity to pursue civil litigation
3. I am not aware of any corporation that would consider it appropriate to instruct a complainant to provide their evidence to, and directly re-engage with, one of the Executives they had accused of misconduct. That is particularly the case when the misconduct is potentially unlawful or criminal.

From April 2019, despite conceding it could not identify an alternative provider to RePipe, RTL blocked the issue of POs to RePipe, whilst denying such in writing and despite notice. RTL issued its last PO to RePipe in November 2019.

In December 2019, RePipe closed its plumbing and civil contracting business, including the redundancy of Employees. Whilst my family lost almost everything, many of the RTL Employees involved in the misconduct, including MD1 and E1, were promoted.

RePipe retained and continues its efforts to progress the rerisk[®] patent applications.

8.2 Regulatory and Government Agencies

From late December 2018, RePipe began filing reports with regulatory and government agencies. By September 2020, RePipe had filed a detailed Chronology and evidence with multiple agencies. In short:

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1. ACCC expressed disdain at RTL's misconduct, but as far as I can ascertain, has not investigated
 2. ASIC repeatedly refused to investigate, even regarding whistleblower protection provisions
 3. The Australian Small Business and Family Enterprise Ombudsman (ASBFEO) agreed to assist but only if RePipe agreed to reduce its complaint to contract issues only and ignore all non-sexual and sexual misconduct. RePipe repeatedly refused to reduce its complaint and then disengaged from ASBFEO. Despite that, more than two months after RePipe had disengaged and without notice, ASBFEO wrote a letter to RTL reducing RePipe's complaint to contract issues only. That letter is provided in Attachment B
 4. The Australian Human Rights Commission repeatedly advised that it could not assist because *"for the purposes of our laws, Rio Tinto does not appear to be a part of the Commonwealth, as such, it does not appear that the Commission could consider a complaint alleging a breach of human rights against it"*
 5. The WA Small Business Development Corporation (SBDC) advised that it could not assist, primarily because SBDC does not have authority to investigate or prosecute and secondarily, because SBDC cannot duplicate the efforts of other public agencies, namely ACCC
 6. The WA Department of Mines, Industry Regulation and Safety (DMIRS), which includes WorkSafe, advised that *"there was no avenues in the portfolios of mines to pursue"*.

Overall, the consistent recommendation received from regulatory and government agencies was that RePipe should seek advice regarding civil litigation.

8.3 Civil Litigation

From January 2019, RePipe repeatedly sought advice regarding civil litigation. On each occasion, Counsel advised they were confident RePipe's evidence is enough to win damages, but funding that interim effort is well beyond the combined wealth of RePipe and my family. Ironically, my family came to realise that civil litigation inherently benefits those that use sexual misconduct to extort. This is because:

1. The more serious the financial harm inflicted, the less likely victims can fund civil litigation
2. The more strategic and sustained the sexual misconduct, the more evidence victims must compile, reconcile and present, and therefore, the more costly the pursuit of civil litigation.

From January 2020, my family also sought legal advice regarding our freedom to speak publicly through journalists, including the risk of civil litigation for defamation. On each occasion, Counsel advised they were confident RePipe's evidence is enough to rely on a truth defence but again, funding that defence is well beyond the combined wealth of RePipe and my family.

At the same time, civil litigations for defamation launched by other high-profile persons had a chilling effect on the willingness of journalists to report allegations of sexual misconduct.

8.4 Politicians

From late December 2018 until February 2020, I emailed Federal politicians a summary of RTL's misconduct, including the Burswood Casino Events, and requested their assistance. Despite follow-up, the following did not reply:

1. Senator Michaelia Cash, then Federal Minister for Employment, Skills, Small and Family Business
2. Hon Melissa Price, then Federal Member for Durack, including Karratha
3. Senator Linda Reynolds, then Federal Assistant Minister for Home Affairs.

After three months of email wrangling, our local Federal Member of Parliament, Hon Christian Porter (Mr Porter) agreed to meet with me in February 2020. At that time, Mr Porter was the Federal Attorney General. During the meeting, Mr Porter:

1. Repeatedly advised that he considered RTL's misconduct, including the Burswood Casino Events, to be "a private argument between you and Rio Tinto"
2. Was unable to advise if any other government agencies or ministers could assist and was unable to recall the names of his ministerial colleagues
3. Said to me "You're welcome to email them if you like, but I doubt they'll be interested or able to assist".

On 3 March 2021, I watched television coverage of Mr Porter's denial of rape allegations against him. In reply to a question, Mr Porter argued that an Independent Inquiry similar to that for the Dyson Heydon matter was not appropriate for the rape allegations against him because the Dyson Heydon matter involved "workplace bullying or harassment allegations where there is a requirement under the relevant health and safety law to conduct an inquiry." That is a very different characterisation to "a private argument".

From March 2021, our local Member of the WA Legislative Assembly, Ms Jessica Shaw, endeavoured to assist RePipe and my family by seeking advice from WA Attorney General, Hon John Quigley (Mr Quigley). In May 2021, Mr Quigley advised by formal letter that he was "*unable to intervene in private legal matters*".

I do not know if the job descriptions and codes of conduct applicable to Federal and State Attorney Generals require them to disclose to the recipients of their advice if they suspect sexual misconduct has occurred. In my opinion, if not prescribed, it is their moral duty.

8.5 Police

The first time RePipe received advice that RTL's misconduct was criminal was on 17 May 2021. That advice was provided by a Barrister during a pro bono appointment at a community legal service. Shortly thereafter, RePipe and my family filed complaints with the WA Police. The Police investigation is ongoing.

It is worth noting however, that even if criminal convictions are achieved, RePipe and my family will still be unreasonably reliant on civil litigation to pursue compensation for the harm that RTL caused.

9.0 Conclusions

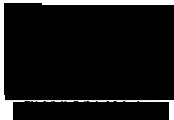
When one reviews the evidence, it is difficult to conclude that RTL's misconduct was anything but a strategy to extort RePipe's capacity to progress the rerisk[®] patent applications. Regardless:

1. RTL planned, instructed, executed and sanctioned their misconduct knowing the harm caused would extinguish:
 - A) RePipe's plumbing and civil business
 - B) My family's financial, physical, mental and emotional security
 - C) RePipe and my family's capacity to prevent global workplace deaths, injuries and illnesses. In my opinion, that is unforgivable.
2. RTL's non-sexual misconduct evolved into unlawful sexual discrimination and harassment and then into criminal sexual assault because RePipe and my family could not access protections, despite reporting the misconduct immediately, accurately and repeatedly

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3. RePipe and my family could not access protections because:
 - A) Despite engaging several Counsels, the burden of classifying RTL's non-sexual and sexual misconduct, and then identifying those parts that were unlawful or criminal, rested with my family until 17 May 2021
 - B) The private and public agencies whose job it was, in whole or in part, to protect us from RTL's misconduct, repeatedly dismissed our reports and refused to investigate.
 4. Our access to civil litigation is the polarity of that for RTL
 5. Ultimately, our family was not even afforded the right to speak our truth.

Our family continues to pursue justice.

Yours sincerely

A black rectangular redaction box covering the signature of the sender.

Jaqueline Outram
Chief Executive Officer

ATTACHMENT A: SUMMARY OF REPIPE'S PERFORMANCE FOR RTL

Across the entirety of its relationship with RTL:

1. RePipe delivered all RTL works without incident, on time or ahead of schedule and on or under budget. Indeed, RePipe:
 - A) Invoiced RTL for 7.7% less than the amounts authorised by RTL
 - B) Also achieved and passed back, additional cost savings that enabled RTL to:
 - i. Complete additional work and/or
 - ii. Eliminate the need to issue numerous cost variations.
2. RTL businesses regularly sought RePipe's advice and assistance to resolve complex field issues
3. RTL procurement functions wrote that in comparison to RePipe "*no competitive market exists*"
4. RePipe's pipebursting projects were twice finalists in the RTL Sam Walsh Award for Innovation in Safety
5. RePipe also received widespread industry recognition, including:
 - A) Telstra, AMP and Sensis Awards for Innovation and Social Responsibility
 - B) Department of Environment & Conservation Award for Small Business Leading by Example and Inaugural Award for Overall Highly Commended
 - C) Civil Contractors Federation Inaugural Women in Civil Award
 - D) BHERT Award for Outstanding Collaboration for National Benefit in Higher Education (jointly with Curtin University, BHP and others)
 - E) Inaugural Future of Mining Safety Award.

ATTACHMENT B: ASBFEO LETTER TO RTL



15 February 2021
Mr Jacob Stausholm
CEO
Rio Tinto Limited
360 Collins St
Melbourne VIC 3000

via email: [REDACTED]

Dear Mr Stausholm

Repipe Pty Limited

My Office has received a request for assistance from Ms Jacqueline Outram of Repipe Pty Limited (Repipe), a small Business in Karratha WA, in relation to an ongoing dispute with Rio Tinto Limited (RTL).

Ms Outram has advised our Office that:

- Repipe provided RTL with plumbing and civil services under a Master Services Agreement between December 2013 to February 2020 within the Karratha region;
- In April 2014, Repipe maintained that its intellectual property (IP) was being distributed by RTL as its own system;
- After requesting RTL investigate the IP issues, Repipe saw a significant drop in Purchase Orders (POs);
- Repipe became concerned in 2018 that RTL had flagged Repipe's Vendor ID Number, creating significant barriers in applying for time sensitive POs;
- Repipe issued a formal complaint on 3 October 2018 to RTL; and
- RTL undertook an internal investigation, however Repipe maintains the investigation was completed without reviewing Repipe's documentation.

Ms Outram maintains that Repipe has suffered financial detriment from the above issues and despite attempting to resolve the matter, it remains unresolved.

To assist our Office to determine what action we should take in relation to this matter, we seek your comments in response to the claims raised by Ms Outram. To ensure prompt progression of this matter, your reply is requested by **26 February 2021**.

If you require any further information, please do not hesitate to contact the Case Manager, [REDACTED] on [REDACTED] or via email at info@asbfeo.gov.au.

Yours sincerely [REDACTED]

Kate Carnell AO
Australian Small Business and Family Enterprise Ombudsman

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