

# Whistleblower Policy

**2023**

This statement is current as at 20 September 2023 and has been approved by the Board of Redivium Limited

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## 1 INTRODUCTION

### 1.1 PURPOSE

Redivium Limited (**Redivium** or **Company**) is committed to maintaining and promoting a culture of integrity, honesty, transparency and ethical behaviour. This Whistleblower Policy supplements the Company's Code of Conduct by outlining a process whereby a whistle blower can raise concerns regarding wrongdoings by the Company or its representatives without fear of intimidation, discriminatory treatment or reprisal.

The Company establishes a process to encourage the reporting of any suspected unethical or illegal behaviour and will protect any officer or employee who raises such a concern.

## 2 APPLICATION

### 2.1 WHO CAN MAKE A REPORT?

The Company's Whistleblower Policy applies to:

- (a) executive and non-executive Directors (including alternate Directors); and
- (b) full-time, part-time and casual employees of Redivium and its subsidiaries;
- (c) contractors including their employees and stakeholders (Redivium Personnel); and
- (d) and a relative or dependent of these persons

### 2.2 DISCLOSABLE MATTERS

Disclosable Matters under this Whistleblower Policy include an actual or suspected:

- (a) breach of the Company's Code of Conduct or other policy;
- (b) illegal or criminal activities;
- (c) conduct that constitutes bribery, corruption or abuse of authority;
- (d) theft or misappropriation of Redivium's property;
- (e) bullying and/or harassment;
- (f) serious risk to the health of an individual or the general public;
- (g) serious risk to the environment; or
- (h) other serious impropriety.

Disclosable Matters do not include personal work related grievances or other similar matters which are not qualified for protection under the Corporations Act. Further information on employment rights and protections are available under employment or contract law.

## 3 REPORTING AND INVESTIGATION

### 3.1 MAKING A REPORT

A person making a report under this Whistleblower Policy is referred to as a 'whistleblower' and all information provided by them will be treated as confidential and are protected under the Corporations Act.

#### **Option 1: Report to the executive team**

A Redivium's employee or other person who become aware of a Disclosable Matters, is encouraged to report the matter to the Company Secretary or to the Managing Director and/or Chief Executive Officer (together **Executive Officer**) with the details of the Disclosable Matters. This can be done by letter, email or telephone call.

## **Option 2: Report anonymously**

If the concern is considered unsuitable for investigation by executive management or the person wishes their identity to remain anonymous to the executive management, the Company provides the following confidential reporting lines:

### **By EMAIL:**

Directly to Mr Jonathan Murray, Chairman of Redivium through an external email address [Redivium.info@gmail.com](mailto:Redivium.info@gmail.com).

### **By POST:**

Private and confidential – open by addressee only  
Mr Jonathan Murray  
Redivium Limited  
PO Box 1227  
West Perth WA 6872

A person who makes a report to these email addresses or to this postal address will be treated as anonymous and their personal details will not be disclosed.

## **3.2 INVESTIGATING A REPORT**

The investigative process will depend on the nature of the conduct being investigated and who is implicated in the reported concern. It may be managed internally or externally as appropriate. The Company's objective is that all investigations be conducted in a manner that is fair and objective to those involved.

All concerns will be investigated as soon as is reasonably practicable and in a confidential, objective and discreet manner. No particulars that would reveal a whistleblower's identity will be disclosed without first obtaining consent.

If not reported anonymously, the whistleblower will be interviewed privately and may be asked to sign a written statement containing the relevant facts.

At the end of an investigation, a report will be completed and provided to the ED, or if appropriate to the Board. Reports and records created will be secured and protected as confidential.

A whistleblower will be kept informed of the investigative process, its progress and its outcomes including the course of action the Company proposes to take or if no action is proposed, an appropriate explanation. If reported anonymously, feedback will be provided via Mr Murray.

## **4 PROTECTION OF WHISTLEBLOWERS**

Redivium is committed to ensuring whistleblowers are afforded confidentiality in respect of any matter raised under this Whistleblower Policy and that they do not suffer detriment as a result of reporting a concern.

'Detrimental' includes dismissal, demotion, harassment, victimisation, discrimination, disciplinary action, bias, threat and/or unfavourable treatment.

Under absolutely no circumstances will the individual who brought the matter to the attention to the Company be subject to any punishment or persecution (within the limit of the laws and Company policies) regardless of any outcome of the matter. The adherence to this philosophical principle is the key to the application of this Whistleblower Policy.

There are special protections available to whistleblowers who disclose conduct which may breach the Corporations Act where particular conditions are satisfied (refer Appendix A).

## **5 PUBLICATION**

A copy of this Whistleblower Policy will be provided to all Redivium Personnel and will be published on Redivium's website.

If you do not understand this Whistleblower Policy or how it applies to you, you should discuss the matter with the Company Secretary or ED before taking any action. If you wish to receive training on compliance, please contact the Company Secretary.

## **6 REVIEW**

This Whistleblower Policy will be reviewed annually by the Board of Directors to ensure it continues to comply with all applicable laws and good corporate governance practices.

## APPENDIX A

### SPECIAL PROTECTION UNDER CORPORATIONS ACT

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#### 1. Conditions for protection

The Corporations Act gives special protection to 'eligible whistleblowers' for disclosure in relation to breaches of the Corporations Act (and certain other Acts) to 'eligible recipients':

**An 'eligible whistleblower' is:**

- (a) an officer or employee of the Company;
- (b) a person with a contract for the supply of goods or services to the Company;
- (c) an employee of such a contractor; and/or
- (d) a relative or dependent of any of the above.

**An 'eligible recipient' of a disclosure is:**

- (a) an officer, executive or manager of the Company;
- (b) the Company's auditor or a member of the audit team;
- (c) ASIC; and/or
- (d) a member of Parliament or a journalist in certain emergency circumstances such as if the breach has an imminent risk of causing harm or danger to public health or safety.

#### 2. Protections given

Protections include:

- (a) a whistleblower cannot be subject to legal liability for making a disclosure;
- (b) protected disclosure information is not admissible in evidence against the whistleblower in criminal proceedings (other than in proceedings of falsity of the information);
- (c) a person, who victimises or harasses a whistleblower or causes detriment such as dismissal or injury to employment or reputation, commits an offence; and
- (d) an individual who suffers detriment as a result of a protected disclosure may claim compensation.