

Code of Conduct

2024

This statement is current as at 26 September 2024 and has been approved by the Board of Redivium Limited

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1. INTRODUCTION

1.1. PURPOSE

Redivium Limited (**Redivium** or the **Company**) encourages all directors, officers, employees and contractors of the Company to respect and comply with the laws and regulations and maintain a high standard of professionalism, ethics and behaviour during their employment with the Company.

1.2. VISION AND VALUES

Redivium's vision is to build a successful sustainable battery recycling company. In pursuing this, the Company manages our business and makes our decisions consistent with the following values:

- > **Care:** prioritising safety; health; the environment; and community;
- > **Integrity:** striving to be consistent; staying true to our values; and accountable for our actions;
- > **Fairness and respect:** valuing diversity and difference; acting without prejudice; and communicating with courtesy;
- > **Transparency:** being honest; addressing problems; and being clear with our communications;
- > **Collaboration:** sharing ideas and knowledge; encouraging cooperation; listening to our stakeholders; and building long term relationships;
- > **Awareness:** taking account of all identified key issues in our decisions; and considering future impacts.
- > **Commitment:** staying focused on the core objectives; making pragmatic, quality technical and commercial decisions; and being decisive with the courage of our convictions.

1.3. STATEMENT OF POLICY

The purpose of this Corporate Code of Conduct (the **Code**) is to provide a framework for decisions and actions in relation to ethical conduct in employment. It underpins the Company's commitment to integrity and fair dealing in its business affairs and to a duty of care to all employees, clients and stakeholders. The Code sets out the principles covering appropriate conduct in a variety of contexts and outlines the minimum standard of behaviour expected from directors, employees and contractors.

2. APPLICATION

2.1 WHO IS COVERED BY THIS POLICY

The Code applies to:

- (a) Redivium and all of its subsidiaries (the **Group**);
- (b) all Redivium's directors, officers, employees, and contractors of the Group (**Redivium Personnel**); and
- (c) Redivium's operations inside and outside of Australia.

3. THE CODE

3.1 LAWS AND REGULATIONS

The Group is subject to local, State and Federal laws of the countries in which it operates. Redivium Personnel should respect the law and act accordingly.

This is an obligation, at all times, to comply with the spirit, as well as the letter of the law and with the principles of this Code.*

3.2 INTEGRITY

Redivium Personnel are to act honestly, in good faith and in the best interests of the Company as a whole.*

3.3 COMPETENCE

Redivium Personnel should maintain an appropriate level of professional competence by ongoing maintenance and technical development of their knowledge and skills. They will:

- › undertake a duty to use due care and diligence in fulfilling the functions of office and exercising the powers attached to that office*;
- › undertake diligent analysis of all proposals received;
- › act with a level of skill expected from for their role of a publicly listed company;
- › use the powers of office for a proper purpose, in the best interests of the Group as a whole;
- › demonstrate commercial reasonableness in decision making;
- › give their specific expertise generously to the Group;
- › have an obligation to be independent in judgment and actions and will take all reasonable steps to be satisfied as to the soundness of all decisions made*;
- › make reasonable enquiries to ensure that the Group is operating efficiently, effectively and legally, towards achieving its goals.

3.4 CONFIDENTIALITY

Redivium Personnel will:

- › not make improper use of information acquired as Redivium Personnel*;
- › not disclose non-public information except where disclosure is authorised or legally mandated*;
- › keep confidential, information received in the course of the exercise of their duties and such information remains the property of the Company from which it was obtained and it is improper to disclose it, or allow it to be disclosed, unless that disclosure has been authorised by the person from whom the information is provided, or is required by law*.

3.5 CONFLICT OF INTEREST

Redivium Personnel owe a fiduciary duty to the Group as a whole and will not:

- › allow personal interests, or the interest of any associated person, to conflict with the interests of the Group*;

- > take improper advantage of their position or use the position for personal gain or to compete with the Group[†]; and
- > engage in conduct likely to bring discredit upon the Group*.

3.6 USE OF COMPANY RESOURCES

Redivium Personnel will protect and ensure the efficient use of the Group's assets for legitimate business purposes[†].

Requests to use the Group's resources outside core business time should be referred to management for approval. If approval is obtained, they will not take advantage of Group's property or use such property for personal gain or to compete with the Group[†].

3.7 RESPECT FOR PERSONS

The Company encourages fair dealing by Redivium Personnel with the Company's customers, suppliers, competitors and other employees[†].

Redivium Personnel must not harass, discriminate, or support others who harass and discriminate against colleagues or members of the public on the grounds of sex, pregnancy, marital status, age, race (including their colour, nationality, descent, ethnic or religious background), physical or intellectual impairment, homosexuality or transgender.

3.8 REPORTING MATTERS OF CONCERN

Redivium Personnel are encouraged to report any and/or all unlawful/unethical behaviour and actively promote ethical behaviour and protection for those who report violations in good faith.

* From the AICD Code of Conduct

† From the ASX Corporate Governance Council's Principles of Good Corporate Governance.

4. CONSEQUENCES OF BREACH

The Company's board (the **Board**) is responsible to ensure that all Redivium Personnel are aware of this Code and to ensure that any individual who does not adhere to these ideals is dealt with appropriately by the management. Non-compliance will be taken seriously and will be subject to appropriate action (counselling or disciplinary), up to and including termination of a person's employment or appointment.

5. MONITORING

Redivium Personnel must notify the Company Secretary as soon as possible of suspected, potential or actual breaches of the Code. Personnel should seek the advice of the Company Secretary if unsure whether particular conduct constitutes a breach of the Code.

All such reports will be handled in accordance with the Whistleblower Policy.

6. PUBLICATION

A copy of the Code will be provided to all Redivium Personnel and will be published on the Company's website (<https://redivium.com>).

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

7. REVIEW

The Code will be reviewed annually to ensure it continues to comply with all applicable laws and good corporate governance practices.