

# Whistleblower Policy

**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

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### 1.1. PURPOSE

Redivium Limited (**Redivium** or the **Company**) is committed to maintaining and promoting a culture of integrity, honesty, transparency and ethical behaviour.

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.

### 1.2. STATEMENT OF POLICY

This Whistleblower Policy (the **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.

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## 2. APPLICATION

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### 2.1 WHO IS COVERED BY THE POLICY

The Policy 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**);
- (c) a relative or dependent of Redivium Personnel; and
- (d) Redivium's operations inside and outside of Australia.

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## 3. THE POLICY

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### 3.1 DISCLOSABLE MATTERS

Disclosable matters under the 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.

(altogether referred to as the **Disclosable Matters**).

Disclosable Matters do not include personal work related grievances or other similar matters which are not qualified for protection under the *Corporations Act 2001* (Cth) (the **Corporations Act**). Further information on employment rights and protections are available under employment or contract law.

### 3.2 REPORTING THE DISCLOSABLE MATTER

A person making a report under the 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 the 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 the Chair 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.

### 3.3 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 Executive Officer or the Chair, 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.

### 3.4 PROTECTION OF WHISTLEBLOWERS

Redivium is committed to ensuring whistleblowers are afforded confidentiality in respect of any matter raised under the 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 the 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).

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## 4. PUBLICATION

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A copy of the Policy 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 Policy or how it applies to you, you should discuss the matter with the Executive Officer, the Chair, or the Company's authorised spokespersons before taking any action.

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## 5. REVIEW

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