

Number : **RVT-POL-GOV-002**

Name : **ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

Category : Corporate Governance

SCOPE

This policy applies to all directors, officers, employees, consultants and contractors of Richmond Vanadium Technology Limited (**Personnel**). This policy also applies, as far as is reasonably achievable, to Richmond Vanadium Technology Limited service providers, suppliers and third-party contractors (**Third Parties**).

OUR COMMITMENT

Richmond Vanadium Technology Limited (the **Company** or **RVT**) recognizes that bribery and corruption act to undermine legitimate business activities, distort competition and may expose the Company, its employees and other stakeholders to significant risks.

The Company prides itself on its reputation for:

- acting with integrity and honesty wherever we do business; and
- committing to a zero-tolerance approach to bribery and corruption.

The Company's reputation is built on:

- its values as a Company;
- the professionalism of our employees; and
- the collective commitment to acting with integrity, accountability and transparency at all times.

The Company is committed to doing business with integrity, which includes always complying with the laws of Australia and every other country or jurisdiction in which we currently or in the future may operate.

OUR STRATEGY

The Company, its employees and representatives will act with integrity by:

- never offering, paying, soliciting or accepting bribes in any form;
- never offering or accepting an item, money, travel, hospitality, entertainment or other token of appreciation during a tender period from a supplier involved in that tender process
- never offering or accepting an item, money, travel, hospitality, entertainment or other token of appreciation in exchange for practices of favouritism, discrimination, collusion or which will have an influence on responsible business practices.; and
- never engaging in any form of corrupt business practice, for the benefit of the Company, another party or themselves.

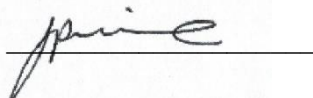
OUR RESPONSIBILITY

All Company officers, employees, vendors, contractors, consultants and other business partners (Personnel and Third Parties) are expected to read, understand and adhere to this policy, and act at all times in keeping with the spirit of the policy. All Personnel and any Third Parties will be provided with access to a copy of this policy via the Company's website [www.richmondvanadium.com.au].

The Company provides a safe mechanism pursuant to its Whistleblower Policy to enable and encourage the reporting of any actual, alleged, or perceived, instances of bribery or corruption by any individual to which this policy applies.

RELATED POLICY, PROCEDURES AND GUIDELINES

RVT-POL-GOV-001	Code of Conduct Policy
RVT-POL-GOV-0010	Whistleblower Protection Policy
RVT-GUI-GOV-002	Anti-Bribery and Anti-Corruption Guidelines



Jon Price
Managing Director

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