



# **WHISTLEBLOWER & GRIEVANCE PROCEDURE**

**05 May 2024**

**Version 1.1**

## 1. PURPOSE

This procedure outlines the process for confidentially reporting and addressing suspected misconduct, regulatory breaches, unethical behavior, or grievances within Rich Precious Metals Limited (“RPM”). The aim is to promote transparency, accountability, and integrity while protecting the rights of employees, partners, and external stakeholders.

## 2. SCOPE

This procedure applies to all RPM employees, contractors, suppliers, customers, and business partners. It covers:

- Alleged violations of law or regulation
- Breaches of internal policy (including AML/CFT, anti-bribery, or sourcing standards)
- Unethical behavior or harassment
- Human rights or ESG-related concerns

## 3. REPORTING MECHANISM

Reports can be submitted through the following confidential channel:

- Email: [compliance@rpm.hk](mailto:compliance@rpm.hk)

Reports should include:

- A description of the concern
- Relevant names, dates, locations, and supporting details
- Whether the whistleblower has direct or indirect knowledge of the matter

## 4. CONFIDENTIALITY AND NON-RETALIATION

All reports will be treated confidentially. RPM will not tolerate retaliation, discrimination, or harassment against anyone who makes a report in good faith. Retaliation itself is grounds for disciplinary action.

Anonymous reports are accepted, but including contact information is encouraged to facilitate further inquiry.

## **5. INVESTIGATION PROCESS**

The Compliance Officer will:

- Log and acknowledge the report
- Conduct a preliminary risk assessment
- Initiate a confidential investigation
- Escalate serious matters to senior management or external authorities if required

A response or summary of findings will be provided to the whistleblower where possible.

## **6. RESOLUTION AND CORRECTIVE ACTION**

If misconduct or policy violations are confirmed, RPM will:

- Take prompt corrective or disciplinary action
- Update relevant procedures or controls to prevent recurrence
- Report externally where required by law or regulation

## **7. REVIEW AND TRAINING**

This procedure is reviewed annually by the Compliance Officer. Awareness of whistleblowing channels is included in all employee compliance training programs.