



Whistleblower Policy

1. Introduction

ROC is committed to conducting business in an ethical and transparent manner and to promoting the highest standards of integrity, corporate compliance and good corporate governance.

ROC encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving ROC's business and provides protections and measures so that those persons who make a report may do so confidentially and without fear of intimidation or reprisal.

2. Purpose

The purpose of this Policy is to:

- encourage ROC People to report concerns of Potential Misconduct openly or anonymously;
- help provide ROC People with a supportive working environment in which they feel able to report concerns of Potential Misconduct;
- provide information about how to report and the protections available to people who report concerns of Potential Misconduct; and
- outline the processes for responding to reports of Potential Misconduct.

3. Who is covered by this Policy

This Policy applies to:

- ROC and all subsidiaries and affiliated entities over which it exercises control; and
- ROC's past and present employees, contractors, directors and officers, as well as their relatives and dependents.

In this Policy each person listed above is referred to as a **ROC Person** (and collectively **ROC People**).

4. Where does this Policy apply

This Policy will be applied in accordance with the laws of the relevant jurisdiction where the ROC Group operates. The Policy aims to meet global best practice standards for protecting individuals who report Potential Misconduct. Where local jurisdictional requirements are more stringent than those contained in this Policy, those requirements will apply in addition to this Policy.

5. Conduct covered by this policy

ROC encourages reporting of Potential Misconduct. **Potential Misconduct** means any suspected or actual conduct in relation to ROC that is:

- dishonest, fraudulent or corrupt;
- illegal, such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law;
- unethical, such as dishonestly altering company records or data, adopting questionable accounting practices;
- in breach of internal policy (including the Code of Conduct);
- conduct likely to damage the financial position or reputation of ROC;
- misconduct or improper state of affairs in relation to a Group company; or
- a danger, or represents a danger, to the public or financial system.

Potential Misconduct does not generally include personal-work related grievances. These are generally grievances relating to staff member's current or former employment or engagement that have implication for that person personally, and that do not have broader implications for the Group.

A ROC Person who deliberately submits false disclosures will not be subject to the protections set out in this Policy (or the *Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019*) (**Act**). We encourage ROC People to consider the consequences of false reporting on ROC's reputation and the reputation of the individuals involved. This does not however include situations where an eligible person reasonably suspects misconduct but their suspicions are later determined to be unfounded.

6. Reporting to the Whistleblower Protection Officer

Reports of Potential Misconduct can be made to the Whistleblower Protection Officers (**WPO**). The Chief Executive Officer and General Counsel & Company Secretary have been delegated and authorised as the WPOs and are the permanent points of contact for investigations.

The WPOs may be contacted:

- via email at whistleblowing@rocoil.com.au; or
- in person; or
- via post to the attention of "The Whistleblower Protection Officers" at Level 12, 20 Hunter Street, Sydney, NSW 2000.

You should provide as much information as possible, including details of the Potential Misconduct, people involved, dates, locations and any more evidence that may exist.

7. Reporting to Eligible Recipients

A ROC Person can also make a report of Potential Misconduct under this Policy to an "Eligible Recipient" within the Company. Eligible Recipients in relation to ROC are:

- Chief Executive Officer;
- Chief Financial Officer;
- General Counsel and Company Secretary; or
- any Director.

While ROC encourages reports to be made to the above nominated people, this Policy is not intended to prevent ROC People from reporting Potential Misconduct, providing information to, or communicating with a government agency, law enforcement body or a regulator in accordance with any relevant law, regulation or prudential standard applicable in a jurisdiction in which the ROC Group operates. You may also raise your concerns to your lawyer for the purposes of advice or representation on whistleblower laws.

8. Confidentiality and Anonymity

When making a disclosure, you may do so anonymously. Whilst you are encouraged to share your identity when making a disclosure, as it will make it easier for ROC to address your disclosure, you are not required to do so.

All information received from you will be treated confidentially and sensitively.

If you make a disclosure, your identity (or any information which would be likely to identify you) will only be shared if:

- You give your consent to share that information; or
- The disclosure is allowed or required by law.

9. Investigation

ROC will investigate all reports of Potential Misconduct under this Policy as soon as practicable after the matter has been reported.

ROC will provide feedback to you regarding the investigation's progress and/or outcome (subject to considerations of the privacy of those against whom allegations are made).

The investigation will be conducted in an objective and fair manner, and otherwise as is reasonable and appropriate having regard to the nature of the Potential Misconduct and the circumstances.

10. Protection and Support

ROC is committed to protecting and respecting the rights of a person who make a report of Potential Misconduct under this Policy. ROC will support and protect you even if it turns out your concerns are mistaken.

ROC will not tolerate any reprisals (including dismissal or demotion), discrimination, bias, harassment, intimidation or victimisation against any person suspected of making a report of Potential Misconduct.

Under the Act and *Corporations Act 2001* (Cth), you may be entitled to other protections, including by not being subject to civil, criminal or administrative liability and not having any contractual or other remedy enforced (or contractual or other right exercised) against you on the basis of the making of the report.

However, you will not be protected from civil or criminal liability or from the consequence of any breach of ROC's policies or any internal disciplinary processes for your own Potential Misconduct.

11. Availability of Policy and Training

ROC will seek to ensure that employees are informed about and understand this policy. Each employee will have access to this Policy. Training will also be provided to individuals who receive whistleblowing disclosures or otherwise have a role under this Policy, including in relation to how to respond to disclosures.

A copy of this Policy will also be available on ROC's intranet and website.

This Policy does not form part of any terms of employment and ROC may change, apply or withdraw this Policy in its discretion.

Any questions about this Policy can be referred to the General Counsel & Company Secretary.

Adopted by the Board on 5 December 2019.