

## Whistleblower

### 1. Introduction

Rokon is committed to fostering a culture of compliance and ethical behaviour. This includes encouraging people to speak up about any unlawful, unethical or irresponsible behaviour relating to Rokon.

Rokon has adopted this Policy to provide a safe and confidential environment for people making a disclosure of misconduct concerns without fear of reprisal.

This Policy sets out:

- when you may be protected for making a disclosure;
- the protections you will have if you make a protected disclosure; and
- how Rokon will handle disclosures made under this Policy.

This Policy protects those who are entitled to protection under the Australian whistleblower laws.

Rokon may investigate your disclosure in accordance with this Policy, even where protection under the Australian whistleblower laws may not apply.

This policy should be read in conjunction with the Rokon Whistleblower Procedure, and the Rokon Code of Conduct.

### 2. Application

This Policy applies to all directors, management, staff and contractors of Rokon, wherever they are based.

By making a disclosure in accordance with this Policy, you may be protected under the Australian whistleblower laws if the type of matter you disclose is protected by those laws.

While this Policy principally deals with internal disclosures, the protections afforded by the Australian whistleblower laws also include some types of disclosure made to external parties such as legal representatives, MPs or journalists. Refer to the Whistleblower Procedure for more details on Interaction with Whistleblower Laws.

You will be protected under this Policy if:

- you are or were one of the individuals set out below in Section 3;
- you disclose information about the type of matters set out in the Whistleblower Procedure and
- you disclose that information:
  - internally to one of the persons set out in the Whistleblower Procedure or
  - externally to one of the bodies set out above.

To support the application of this policy, Rokon has nominated a Whistleblower Protection Officer (WPO) who can be emailed at [whistleblower@rokon.com.au](mailto:whistleblower@rokon.com.au), or written to at the following address:

**The Whistleblower Protection Officer  
Rokon Pty Ltd  
Suite 1/75 River Street  
Richmond VIC 3121**

Further details about the responsibilities of the WPO are contained within the Whistleblower Procedure.

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### 3. Who may make a protected disclosure?

You may make a disclosure that qualifies for protection under the Australian whistleblower laws if you are or were:

- an officer or employee of Rokon, including permanent, part-time, fixed-term or temporary employees or interns, and secondees;
- a contractor or supplier of goods and services to Rokon (whether paid or unpaid) (eg consultants, service providers and business partners), including an employee of such a contractor or supplier;
- an associate of Rokon; or
- a parent, grandparent, child, grandchild, sibling, spouse or dependent of any of the above.

We encourage you to raise any concerns about non-compliance with this Policy with Rokon's Whistleblower Protection Officer in the first instance. You may also lodge any concerns with ASIC, APRA or the ATO for investigation.

### 4. What may a protected disclosure be about?

- Disclosures may be about misconduct or an improper state of affairs or circumstances in relation to Rokon (including by an Rokon officer or employee) where you have reasonable grounds to suspect it has occurred or is occurring in relation to Rokon.
- Disclosures do not have to be about breaking the law.
- Disclosures solely about a personal work-related grievance are not covered by this Policy and do not qualify for protection under the Australian whistleblower laws unless they also relate to any detriment or threat of detriment by reason of you making or being suspected of making a protected disclosure (see Whistleblower Procedure - Protection from detriment for examples).

### 5. How to make a protected disclosure

- You may make a disclosure at any time to the people identified in the Whistleblower Procedure in person (verbally or written), by email/website contact form or via phone.
- If you make a disclosure from or to a Rokon email address, your email may be accessed by certain people within our IT department in accordance with Rokon's policies. If you are concerned about those limited circumstances in which your email might be accessed, you may prefer to make your disclosure verbally or by mail.
- You may make your disclosure anonymously (and stay anonymous throughout and after any investigation) and still qualify for protection under the Australian whistleblower laws. You may adopt a pseudonym when making your disclosure if you would prefer not to disclose your identity to others.
- You may wish to obtain independent legal advice before making a disclosure. That communication with your legal adviser will also be protected under the Australian whistleblower laws.
- You can also contact the Rokon Whistleblower Protection Officer for general advice about the operation of this Policy and Rokon's whistleblower processes and procedures.

### 6. Legal Protections

- Everyone involved in an investigation must take all reasonable steps to reduce the risk that a discloser will be identified.
- If you make a protected disclosure, it is illegal for anyone to identify you or disclose any information that is likely to lead to you being identified. The whistleblower procedure contains further details regarding protections and exceptions
- You may lodge a complaint to a regulatory body, such as ASIC, APRA or the ATO, if you believe that your confidentiality has been breached.

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- It is against the law for anyone at Rokon (including any officers, employees or contractors) to cause or threaten any detriment to any person because that person:
  - is or proposes to make a disclosure under this Policy or the Australian whistleblower laws; or
  - is suspected or believed to have made a disclosure under this Policy.
- However, you may be liable for any misconduct that you have engaged in that is revealed by your disclosure (or revealed by an investigation following your disclosure).
- A breach of this Policy will be regarded as serious misconduct which may lead to disciplinary action, up to and including termination of employment. Failure to comply strictly with this Policy could expose you or Rokon to serious civil or criminal liability and damage Rokon's reputation.

### 7. Investigations

When you make a disclosure internally under this Policy, your disclosure will typically be investigated as per the steps outlined in the Rokon Whistleblower Procedure. The process may vary depending on the nature of your disclosure.

Rokon has in place processes for protecting, supporting and monitoring the welfare of any employee or associate who makes a disclosure. This may include authorising extended leave, considering alternative employment or supervisory arrangements (eg reporting lines, role reassignment or job relocation) and support services such as counselling.

### 8. Board Reporting

The Whistleblower Protection Officer will, where appropriate (whilst maintaining confidentiality as applicable), provide Rokon's delegated committee reports on all active whistleblower matters on a regular basis.

### 9. Training

Rokon will provide this policy and supporting procedure to all staff at induction and at other times as required.

Rokon will provide training to employees, including their rights and obligations under this Policy, and to officers and senior managers, who may receive disclosures under this Policy, about how to respond to those disclosures.

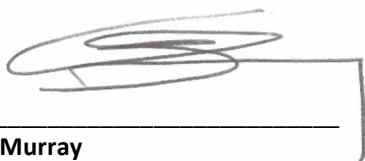
Directors, management and staff must attend all training on Rokon's whistleblower program.

### 10. Further Information

We encourage you to contact our Whistleblower Protection Officer[s] if you have any questions about this Policy including what it covers and how disclosures will be handled.

For more information about the Australian whistleblower laws (including how to make a disclosure directly to ASIC or the ATO), see the information available on the ASIC website (including Information Sheet 239: How ASIC handles whistleblower reports and Information Sheet 247: Company officer obligations under the whistleblower protection provisions) and the ATO website.

This Policy will be made available to all employees.



**Greg Murray**  
Executive General Manager – Corporate & Commercial

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