



## **Communications Policy**

### **1. Introduction**

ROC is committed to best practice corporate governance in relation to communicating with shareholders. This requires ROC to respect the rights of shareholders by ensuring that it has effective processes in place to communicate with shareholders. To achieve this, the Board recognises the need to have a policy which ensures that shareholders are informed of its activities and performance in a timely and effective way, that they are given ready access to balanced and understandable information about company proposals and are able and welcome to participate in general meetings.

### **2. Purpose of the Communications Policy**

The Board has adopted this policy to provide guidelines in relation to:

- ROC's commitment to shareholder communication
- Market communication
- Communication of Material Information
- Responsibility for communication with exchanges
- Authorised spokespersons
- Company meetings
- Briefings
- Analyst reports and estimates
- Staff presentations to external conferences
- Oil and gas company reserves and resources reporting
- ROC website
- Employee communications
- Reporting on shareholder communication in the Annual Report

### **3. ROC' Commitment to Shareholder Communication**

ROC is committed to effective communication with its shareholders, market participants, customers, employees, suppliers, financiers, creditors, other stakeholders and the wider community. ROC will ensure that all stakeholders, market participants and the wider community are informed of its activities and performance.

ROC will endeavour to make publicly available full information to ensure that trading in its shares takes place in an efficient, competitive and informed market.

In its dealings with shareholders ROC is committed to the following principles:

- all shareholders will have equal and timely access to material information concerning the Company including its financial situation, performance and governance;
- company announcements will be:
  - factual and complete with no omission of material information; and
  - presented in a clear, objective and balanced way, with disclosure of both positive and negative information as necessary;
- all shareholder enquiries will be responded to promptly with integrity;
- electronic communications will be used, as appropriate as an effective means of communication; and
- shareholder meetings will be conducted in a manner to promote the participation of shareholders.

#### **4. Market Communication**

As a company listed on the Australian Securities Exchange ROC is required to comply with continuous disclosure obligations under the ASX Listing Rules.

Under these rules ROC must inform the ASX immediately it becomes aware of any information which would reasonably be expected to have a material effect on the price or value of any securities issued by ROC. The intention of this rule is to keep the market fully informed of information that would, or would be likely to influence investor decisions.

To ensure compliance with these disclosure obligations ROC has in place a Continuous Disclosure Policy which sets out the guidelines and procedure for determining and disclosing Material Information to the market.

#### **5. Communication of Material Information**

All information disclosed to the ASX in compliance with the Continuous Disclosure Policy will be placed promptly on ROC's website, following receipt of confirmation from the ASX.

#### **6. Responsibility for Communication with Exchanges**

The Company Secretary and General Manager Corporate Affairs are responsible for communications with the ASX, including in relation to any breach or potential breach of the ASX Listing Rules or other legal requirements.

#### **7. Authorised Spokespersons**

Only Directors, the CEO, COO, CFO or General Manager Corporate Affairs may speak on behalf of ROC to analysts, investors or the media on Company matters.

No other employee may communicate with analysts, investors or the media unless specifically authorised to do so by one of the above officers.

## **8. Company Meetings**

ROC encourages and supports shareholder participation in general meetings. Mechanisms for enabling shareholder participation will be reviewed by ROC regularly to encourage the highest level of participation including:

- notices of meetings being prepared and meetings being conducted in accordance with industry best practice; and
- the use of electronic communication to disseminate information relating to meetings including the use of webcasting where practical.

## **9. Briefings**

During the year ROC participates in investment conferences and briefings for investors and analysts. At these meetings:

- no new information of a material nature will be disclosed (including in response to questions) unless it has previously been released to the market. If such information is inadvertently released it will immediately be released to the ASX and posted to the ROC website;
- a representative of ROC will attend all briefings and a record will be kept of the names or numbers of attendees at the briefing and the time and place of the briefing; and
- ROC will post a copy of any presentation material on its website.

## **10. Analyst Reports and Estimates**

ROC may review analyst's research reports but will confine its comments to factual matters and material previously disclosed by it to the market generally. The Company may comment on analyst estimates to the extent of:

- acknowledging the current range of estimates;
- questioning an analysts assumptions or sensitivities if the analysts estimate is significantly at variance from current market estimates; and
- advising factual errors where data is already in the public domain.

Questions raised in relation to price sensitive information not previously disclosed will not be answered.

ROC will not provide any new information of a material nature to any analyst or investor unless it has already been disclosed to the market.

If price sensitive information is inadvertently released during a briefing, it will be immediately released to the ASX and posted on the ROC website.

Forecast information (including any information that may impact on forecast information) will not be provided by ROC unless it has already been disclosed to the market generally.

## **11. Staff Presentations to External Conferences**

All ROC staff making external presentations are required to have their presentation approved in writing by the Company Secretary prior to the presentation or the provision of presentation material.

No new information of a material nature will be disclosed (including in response to questions) unless it has previously been released to the market. If such information is inadvertently released it will immediately be released to the ASX and posted to the ROC website.

## **12. Oil and Gas Company Petroleum Reserves and Resources Reporting**

ROC provides information regarding reserves and resources as required in the Annual Report lodged with the ASX.

Any disclosures required by ROC in relation to reserves or resources will be made in accordance with ASX Listing Rules.

## **13. ROC Website**

The ROC website is the primary means to provide information to and communicate with shareholders. It has been designed to enable information to be accessed in a clear and readily accessible manner.

The following will be available on ROC's website:

- all announcements and releases to the ASX;
- copies of presentations to shareholders, institutional investors, brokers and analysts where possible;
- any media or other releases;
- all notices of meetings and explanatory material;
- a copy of the Company's most recent annual report as well as previous annual, half yearly and quarterly reports;
- all of ROC's corporate governance codes, policies and charters; and
- any other relevant information concerning non-confidential activities of the Company including business developments.

ROC's website address is [www.rocoil.com.au](http://www.rocoil.com.au).

## **14. Communication with Employees**

ROC recognises that its employees are central to ROC's success. In order to enable employees to fulfil their role to the high standards required and to promote employee satisfaction, ROC aims to ensure effective communication with employees. Effective communication with employees starts with their direct manager and with accessibility to senior management. Informal communication forms an important part of the process. In addition ROC has adopted the following formal approaches to ensure employees are informed of the activities of the Company:

- ROC will from time to time conduct employee briefings so that all staff are aware of activities within the Company. These briefings will be conducted by the CEO or an appropriate manager.
- ROC Intranet is an important communication tool for employees. It contains a range of information which relates to employees including relevant policies and codes, media and market announcements and presentations to shareholders and institutional investors. Employees are encouraged to access the Intranet on a regular basis so that they can keep up to date with information concerning the Company.

#### **15. Reporting on Communications Policy in Annual Report**

The Board will make appropriate disclosure regarding this Communications Policy in ROC's Annual Report in accordance with the ASX Corporate Governance Principles and Recommendations.

This Communications Policy is available on ROC's website [www.rocoil.com.au](http://www.rocoil.com.au)

**Adopted by the Board on 8 April 2004. Updated on 25 January 2012.**