



Contract Mining | Mining & Construction Equipment

HUMAN RESOURCES POLICY	
POLICY TITLE – CONFLICTS OF INTEREST	
CUSTODIAN: HUMAN RESOURCES DEPARTMENT	
POLICY VERSION: 001	DATE: MARCH 2021

1.0 Policy Brief / Purpose

It is the expectation of Rocksurre International Limited (RIL) as a company, that all employees carry out their assigned duties, exhibiting honesty, truthfulness, trustworthiness and to act in the best interests of the company in all dealings, avoiding interests, activities, relationships and influences as it may have implications on the employee’s judgement and commitment to the company, and by extension compromise the objectivity of the duties.

Each employee will be required to complete a conflicts of interest declaration (copy attached) once a year and also whenever an actual or potential conflict arises in an impromptu circumstance(s).

2.0 Scope

This policy applies to all employees of the company, as well as independent contractors and persons acting on behalf of the company.

3.0 Policy Elements

Generally, conflicts of interest arise in the following situations:

Each employee has a responsibility to avoid conflicts of interest. This responsibility is an ongoing one. Employees must seek guidance if they are in doubt about the best course of action to take in any situation and promptly report suspected conflicts of interest. Failure to do so could have significant implications for you as an employee as well as RIL.

- a. Acting without prior approval as a director of a competitor or an entity that has a business relationship with RIL, holding an outside employment such as a consultant or advisor to a competitor, supplier or contractor or participation in outside activities that conflict with your duties and reliability as an employee of RIL;
- b. Misusing your position in the company, corporate business opportunities, confidential information or proprietary information for personal benefit or for the benefit of the members of your close family or third parties;
- c. Soliciting and acceptance of financial rewards, expensive gifts, favours and sponsorships for personal benefit or third parties;
- d. Having a personal financial partnership or profit-sharing interest in a competitor or in a company that is doing or seeking to do business with Rocksurre International Limited. As regards a listed Company, ownership of less than 5% of the securities of such company is permitted and not deemed contrary to the company’s policy on conflicts of interest;
- e. Being involved directly or indirectly in the engagement, management or supervision of business parties in which you have a financial interest or which are controlled by or for which close relatives work in high management positions;

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- f. Awarding, without disclosure, a contract to a close family member or a company controlled by a close associate, employing or influencing the employment of a family member or associate, working directly in the same reporting line with a close family member or someone with whom you have a close relationship, any of which could undermine or appear to undermine the company's internal controls;
- g. Misusing company funds, property and business opportunities for personal gain or purposes unrelated to the business of the company; and
- h. Soliciting and obtaining loans or guarantees of personal obligations for you or close family members and close associates from entities doing business with the company.

Employees must advise their manager or supervisor and promptly submit a declaration whenever they find themselves in a conflict of interest situation. If there is an actual conflict or potential for a conflict of interest arising, employees must refrain from any discussion, negotiation, decision making or management of a contract or activity relating to the conflicted interest and also refrain from influencing others directly or indirectly regarding the interest in question.

Additionally employees or contractors may submit concerns or complaints regarding conflict of interest on confidential basis via company's website at www.rocksureintl.com.

Conflicts of interest have implications for both the employee and the company. Personal implications include disciplinary action which could possibly lead to loss of employment. Corporate implications could range from financial sanctions and penalties, litigation, regulatory investigations and damage to reputation.

Once an employee becomes aware of or suspect the existence of a conflict of interest (actual, potential or perceived), he/she must report to his or her manager or supervisor.

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DECLARATION OF CONFLICT OF INTEREST FORM
(ROCKSURE INTERNATIONAL EMPLOYEES)

A conflict of interest may relate to you, your spouse/partner, family member, business interests, and/or associates in situations as shown below.

Please indicate "YES" or "NO" as the case may be. If "YES", kindly provide details and use separate sheet(s) in case you require more space.

a. I (or a party related to me) holds a position of financial interest in an outside concern from which Rocksurre International secure goods or services.

b. I (or a party related to me) lender directive, managerial, or consultative service to, or am an employee of, any outside concern that does business with Rocksurre International.

c. I have accepted gifts or other benefits from any outside concern that does, or is seeking to do, business with Rocksurre International.

d. At Rocksurre International, I have participated in management decisions concerning transactions that affect or benefit me, my family, or my personal financial interests.

e. A party related to me has received or continues to receive services from Rocksurre International.

Rocksurre International is responsible for knowing what conflicts might exist and to manage, reduce, or eliminate those conflicts. The key to handling these potential conflicts is full disclosure of any potential conflict or the appearance of a conflict. It should be noted that we believe it is appropriate to disclose any family members that may be supported by, employed by, a vendor of, or business associate of Rocksurre International.

Each employee will complete an annual conflict of interest Declaration Form to inform Rocksurre International of situations that pose or may give the appearance of conflict of interest.

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Again, it is the responsibility of every employee to contact Rocksure International's Human Resources to complete a new Declaration Form to notify Rocksure International of any changes and/or additions that may occur throughout the year.

If you have questions as to whether a conflict of interest exists, we encourage you to discuss this with Human Resources and/or disclose this information on the form.

I certify by signing below and further acknowledge receipt of the Employee Conflict of Interest Policy and that I have accurately completed this disclosure form to the best of my knowledge.

Employee Name

Employee Signature

Employee Title

Date

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