



**FY2024**

**Modern Slavery  
Statement**



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## Our Commitment

Roc Oil Company Pty Limited (**ROC**) is committed to supporting and respecting the protection of internationally proclaimed human rights. We understand that modern slavery and human trafficking can occur in many forms and are committed to operating responsibly and ensuring we have robust standards and processes to minimise and address modern slavery risks.

At ROC we are dedicated to continuous improvement of our policies and procedures relating to the identification of modern slavery risk and we continue to review and improve our approaches to combating modern slavery within our operations and supply chain on an ongoing basis.

This Modern Slavery Statement covers the activities (operations and supply chain procurement) of the reporting entity, ROC, and ROC's controlled entities for the reporting period 1 January 2024 to 31 December 2024.

This Modern Slavery Statement outlines the steps ROC has taken, and will continue to take, to identify, address and mitigate these risks across its operations and controlled entities, especially in countries where modern slavery may be suspected.

This statement is approved by the Board of Roc Oil Company Pty Limited.



**Fang Wenyan**

**Chief Executive Officer**

## Introduction

This Modern Slavery Statement has been prepared in accordance with the *Australian Modern Slavery Act 2018* (the **Act**) and is aligned with the United Nations Guiding Principles on Business and Human Rights. The Modern Slavery Statement covers the activities (operations and supply chain procurement) of the reporting entity, ROC, and ROC's controlled entities for the reporting period 1 January 2024 to 31 December 2024.

Under the Act, the definition of modern slavery encompasses trafficking of persons, slavery and the slave-like practices of servitude, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

ROC acknowledges its responsibility to respect human rights and continues to take steps to address modern slavery risks across its operations and supply chains. This Modern Slavery Statement outlines the steps ROC has taken, and will continue to take, to identify, address and mitigate these risks across its operations and controlled entities, especially in countries where modern slavery may be suspected.

## Structure, Operations and Supply Chains (Criteria 1 & 2)

### Organisational Structure

The reporting entity for this Modern Slavery Statement is ROC, a consolidated entity comprising of 14 wholly owned subsidiaries.

ROC is an independent upstream oil and gas company, 100% owned by Hainan Mining Co. Ltd (**Hainan Mining**), a Shanghai-listed public company domiciled in the People's Republic of China. Beyond its upstream oil and gas business through ROC, Hainan Mining is also engaged in iron ore exploration, mining, sales, international trade and mixing iron ore products, and lithium resource extraction and processing.

ROC operates out of its registered head office at Level 11, 20 Hunter Street Sydney, with regional offices in Beijing and Chengdu, China, and Kuala Lumpur, Malaysia. ROC's assets are owned by various separate controlled entities. In Malaysia, Roc Oil (Sarawak) Sdn Bhd is responsible for all Malaysia-based operations. Roc Oil (China) Company, Roc Oil (Bohai) Company and Roc Oil (Chengdu) Limited are responsible for ROC's China-based operations. All controlled entities operate under the direction and governance of ROC and share the same Board and executive management team.

On 13 September 2024, ROC announced a recommended public cash offer to the shareholders of Tethys Oil AB (publ) (**Tethys Oil**) to tender all their shares in Tethys Oil, resulting in ROC acquiring 90.003% of Tethys Oil shares as of 23 December 2024. Tethys Oil will be fully integrated into ROC's modern slavery reporting and compliance framework from 2025, with immediate implementation of ROC's modern slavery policies and procedures.

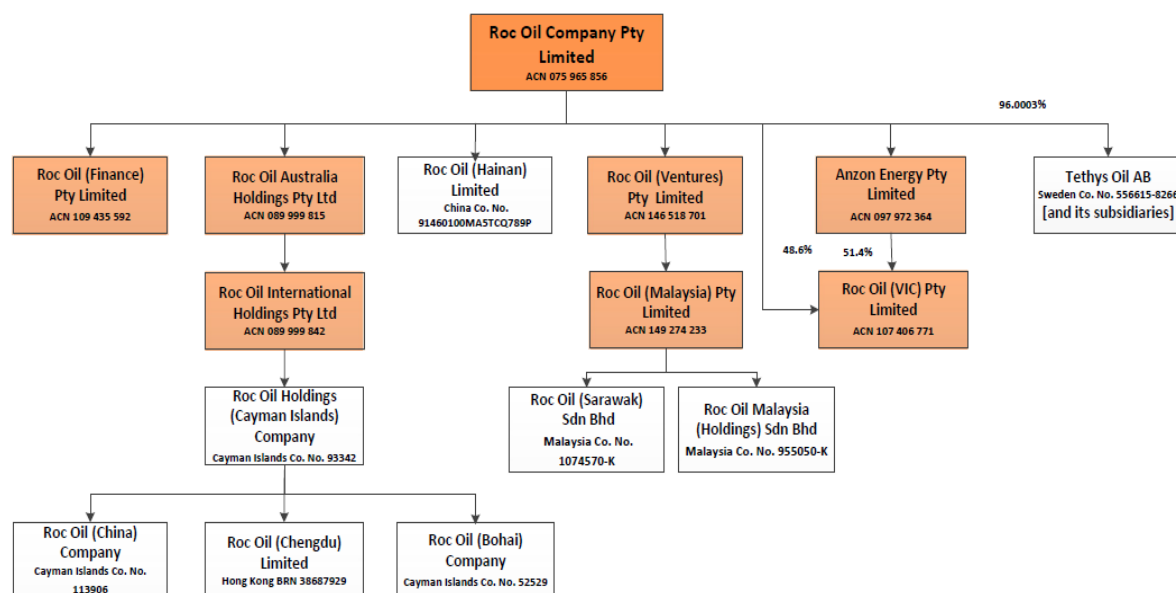
Figure 1 provides an overview of the ROC group corporate structure.

ROC employed 112 people during 2024, comprising of 31 employees in Malaysia and 81 employees in China. Each regional office is responsible for hiring and training its workforce, guided by ROC company policies and procedures.



## Figure 1 – ROC Group Structure

(as at 31 December 2024)



## Corporate Governance

As the parent company, ROC's Board of Directors is responsible for establishing and maintaining good corporate governance of the company and group. Our corporate governance processes provide the foundation for guiding our employees, partners, and suppliers on our commitment to respect human rights and engage in ethical decision-making.

Given the streamlined size of our Board, it oversees and monitors all aspects of ROC's compliance with regulatory requirements and our stringent ethical standards, including Audit and Risk, Nomination, Remuneration and Health, Safety and Environment issues.

## Operations

ROC is experienced in exploration, development, production and operation of both onshore and offshore oil and gas fields in China and Southeast Asia, operating in complex regulatory and operational environments that require heightened attention to human rights and modern slavery risks.

ROC's existing asset portfolio includes ownership interests in strategic oil and gas assets in China and Malaysia. Table 1 and Figure 2 summarise ROC's interests and activities in several oil and gas fields, each of which can consist of several 'blocks', or exploration or production licence areas.

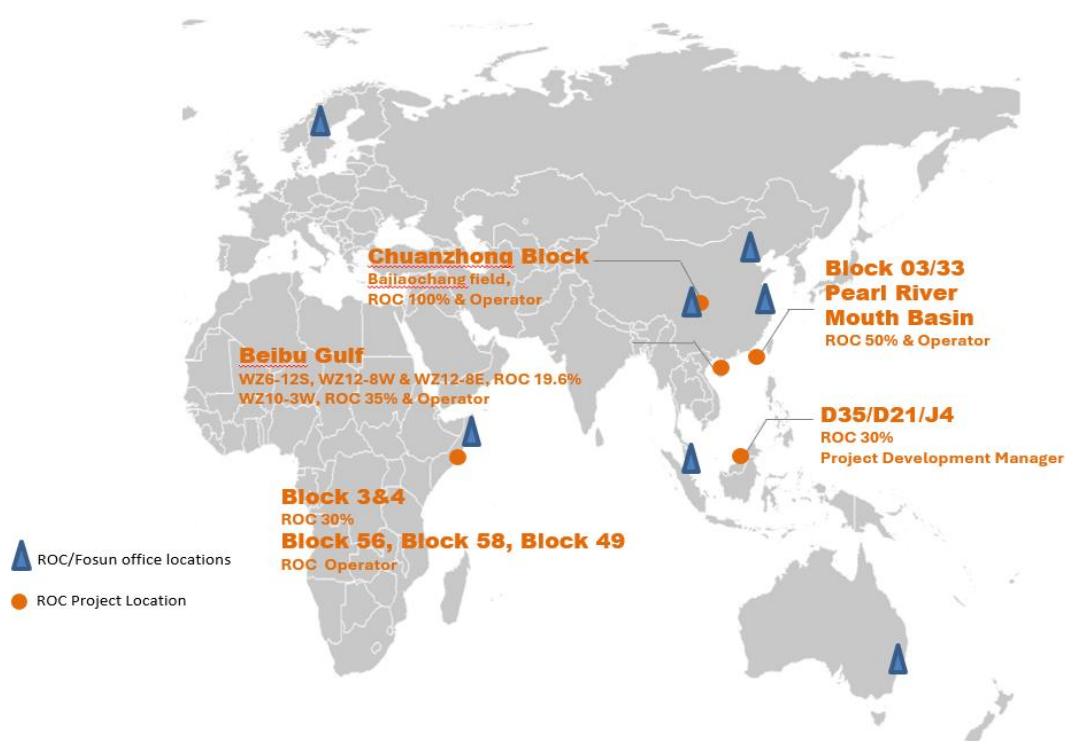
During the reporting period, ROC was both an operating and non-operating joint venture participant. In respect of our operated joint venture interest, ROC was directly responsible for the day-to-day operational decision making.

**Table 1 – Summary of ROC's Asset Portfolio**

Country	Field/Block	Activities and Interest
China	Beibu Gulf (WZ6-12, WZ12-8W and WZ12-8E)	Oil and gas production. Non-operated working interest under a Production Sharing Contract and joint venture agreement (19.6%).
	Beibu Gulf (WZ10-3W)	Oil appraisal and development. Operator for appraisal (58%) and for development planning and execution (35%).
	Pearl River Mouth Basin 03/33 – (Huizhou 12-7 Oilfield)	Oil exploration and appraisal. Operator (50%).
	Sichuan Basin (Chuanzhong Block) - Bajiaochang (BJC) Gas Field	Gas production. Operator (100%).
Malaysia	D35/D21/J4	Oil and gas development and production. Non-operated working interest under a Production Sharing Contract (30%), Project Development Manager for redevelopment operations.

**Figure 2 – ROC Asset Locations**

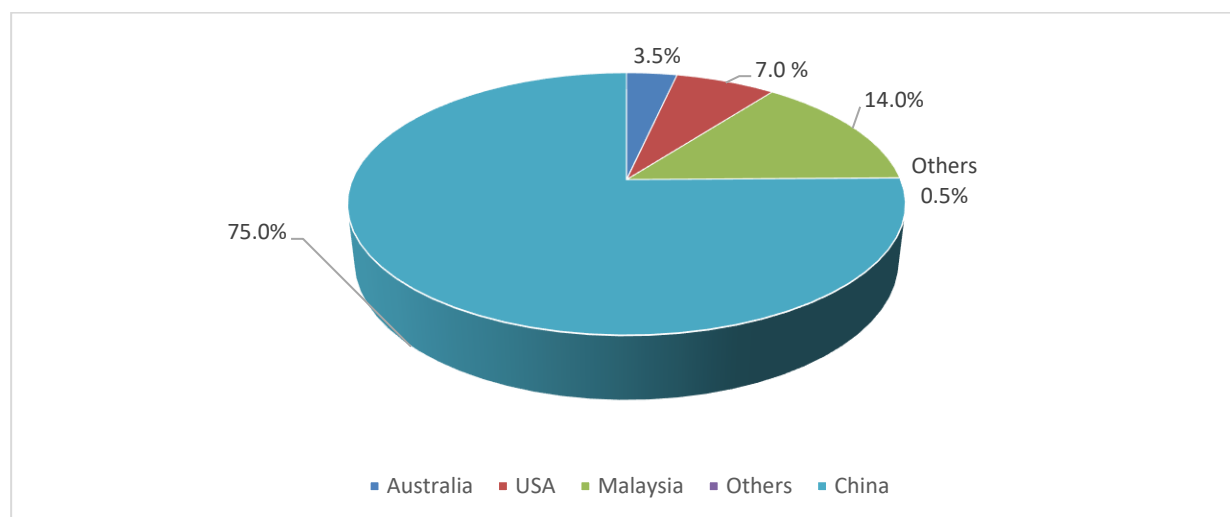
(as at 31 December 2024)



## Supply Chain

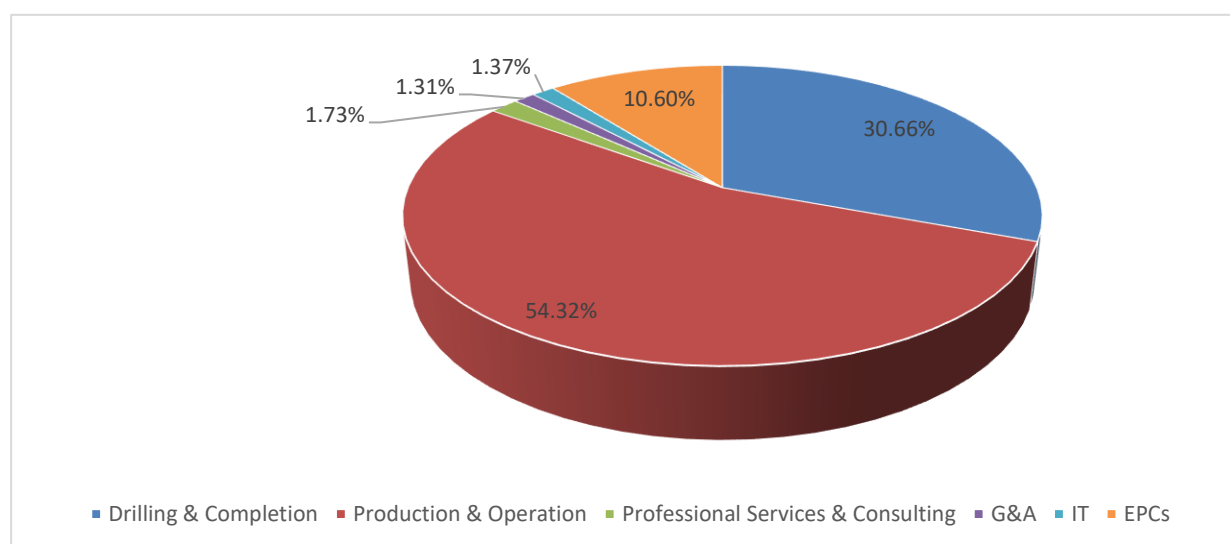
Procurement and supply chain management within the ROC group is a decentralised function and controlled at the regional level. During 2024, ROC spent AUD 191.0 million across 194 Tier 1 (direct) suppliers. Most Tier 1 suppliers are based in Malaysia and China, supporting our Southeast Asian and Chinese operations. Figure 3 shows the breakdown by supplier location.

**Figure 3 – Spend by Supplier Location**



Our direct supply chain costs consisted primarily of expenditure supporting our existing assets and development activities across our broader portfolio, including drilling, completions and well intervention, equipment, parts and consumables and facilities engineering and delivery services. We recognise that our supply chain extends beyond direct suppliers and includes multiple tiers of subcontractors and service providers, potentially increasing modern slavery risks. Figure 4 shows the breakdown by spend category.

**Figure 4 – Supply Chain Categories**



## Modern Slavery Risks (Criterion 3)

ROC is committed to being vigilant in its efforts to identify and address modern slavery within its business so that its purchasing decisions can have a positive impact to reduce prevalence of modern slavery.

During the reporting period, ROC updated its review and the following modern slavery risk factors were considered in undertaking the review:

- Geographic locations of ROC operations/workforce and supply of goods or services.
- Entity risk, considering the maturity of ROC's policies, procedures and training, and the systems of governance/oversight over controlled entities and suppliers.
- Workforce profile and conditions, considering the mechanisms for workforce engagement of ROC personnel (e.g., third-party labour contracting, migrant workers) and workforce skill levels.
- The types of products and services in the supply chain.
- Sectoral risk, engagement with industries and services with elevated modern slavery risks.
- Business model risk, assessment of operational structures that may inadvertently facilitate modern slavery.

## Operations Review

ROC conducted a comprehensive workforce analysis during the reporting period, examining employment location, method of employment (i.e., employee or contractor), the nature of roles performed and working conditions. Our workforce is predominantly based in Beijing and Chengdu, China and in Kuala Lumpur, Malaysia, with employees primarily employed in skilled roles in either a technical operational (i.e., engineering, geology etc) or corporate (i.e., legal, human resources, finance) roles.

High-risk factors for modern slavery can include operating in areas with higher prevalence of vulnerable populations (e.g., migrant workers and base-skilled workers), and business models structured around high-risk work practices (e.g., third-party labour hire).

### Risk Assessment Findings:

- **Low Direct Risk:** Our workforce comprises skilled professionals directly employed by ROC entities under comprehensive employment contracts and group policies.
- **Contractor Oversight:** Enhanced due diligence implemented for third-party contractors and service providers.
- **Geographic Considerations:** Heightened awareness of jurisdiction-specific labour law compliance and cultural factors.

We assess the risk of our operations directly causing modern slavery practices as minimal due to our skilled workforce profile and direct employment model. However, we maintain vigilant oversight of all contractor arrangements and third-party service providers.

## Supply Chain Review

Our comprehensive supply chain risk assessment was performed by identifying the largest supply categories (by spend) for Tier 1 goods and services across ROC operations and identifying potentially high-risk categories and associated risk factors. We recognise that modern slavery risks exist across supplier categories regardless of transaction value, requiring both targeted and broad-spectrum risk management approaches.



We note that some sector-specific high-risk product and service categories as listed by some organisations, include cleaning, security, maintenance, asset management, labour hire, logistics/transport, IT hardware, and consumables/materials. We used public information to assess which product or service categories could contribute to, or be linked to incidences of modern slavery, and therefore be considered as potentially high-risk categories, which include:

- Marine transport services
- Property management and maintenance
- IT hardware procurement
- Cleaning and security services
- Waste management
- Contract labour arrangements
- Personal protective equipment (PPE)

During the reporting period, marine transport and property management together comprise approximately 2% of the expenditure for the reporting year. The other potentially high-risk categories all represent less than 2% of the expenditure per category. Despite lower spend percentages, we recognise these categories warrant enhanced due diligence due to inherent sectoral risks.

ROC's joint venture partners include national oil companies such as CNOOC, PetroChina and Petronas, all of whom have rules and regulations on tendering, contracting and material supply which take into consideration environmental and social risks in the supply chain, such as safety and health, labour rights, environmental protection and business ethics.

ROC acknowledges that some of our Tier 1 suppliers are based in geographic areas that may have risks of modern slavery, necessitating enhanced due diligence and ongoing monitoring.

## **Actions to Address Risks (Criterion 4)**

ROC is committed to maintaining the ethical standards of the company in the conduct of its business activities. Our reputation as an ethical business is important to our ongoing success and we expect our directors, employees and contractors to be familiar with, and have a personal commitment to, meeting these standards.

ROC has policies and guidelines in place that are intended to promote ethical and legally compliant business conduct. Our policies and Code of Conduct guide our actions and support our commitment to prevent human rights violations including modern slavery from occurring in our business.

Furthermore, we maintain procurement procedures and standard employment contracts, applicable to controlled entities in China and Malaysia.

In 2024, the key additional actions taken to assess and address modern slavery risks included:

- engaged proactively with operators of our joint ventures to gain a deeper understanding of their vendor and supply chain processes;
- continued robust engagement with industry peers and joint venture participants for our non-operated assets fostering a collaborative approach to risk mitigation;
- conducted a thorough review of our suite of risk-related policies and governance control measures to ensure our continued appropriateness and effectiveness in mitigating identified modern slavery risks within our business;

- reviewed our contracts and incorporated a modern slavery clause into new high-risk value contracts, strengthening our contractual safeguards;
- delivered targeted modern slavery and human rights training across key business units, enhancing awareness and understanding among our personnel; and
- provided legal guidance on reviewing timesheets, insurance programs for workers of suppliers, adding an additional layer of due diligence.

## Future Actions

We are committed to the continuous improvement of our modern slavery program, recognising that this is an ongoing journey.

During the next reporting period we plan to implement the following key initiatives:

- release further internal training on Modern Slavery and our Code of Conduct, ensuring all relevant personnel receive comprehensive and up-to-date education;
- Actively explore and implement innovative strategies to improve the response rate for our supplier Modern Slavery Questionnaire, aiming for broader and more comprehensive supplier engagement;
- Intensify our analysis of collected data to identify emerging trends and systemic issues. This will enable us to implement targeted controls, significantly enhancing our reporting capabilities and enabling more informed supplier selection to better manage modern slavery risk in our supply chain;
- Proactively create and pursue opportunities for collaboration with a wider range of stakeholders, including our valued suppliers, clients, and leading organizations active in the field of human rights, to leverage collective expertise and drive impactful change;
- Maintain an ongoing and rigorous review and assessment of the effectiveness of our policies, procedures, and guidelines in identifying and minimising modern slavery risks across all facets of our business and supply chains; and
- Implement a more in-depth review process for timesheets and insurance programs pertaining to workers from our suppliers, further enhancing our due diligence and risk assessment.

## Effectiveness Assessment (Criterion 5)

ROC employs its established and robust risk management framework to effectively assess performance in combating modern slavery. This assessment is conducted through a multifaceted approach, including:

- **Supplier Questionnaires:** Regularly deploying and analysing supplier questionnaires to gather insights into their modern slavery mitigation practices.
- **Reviews and Audits:** Conducting periodic reviews and targeted audits of our operations and supply chain components to verify compliance and identify areas for improvement.
- **Grievance Monitoring:** Diligently monitoring and addressing any grievances related to modern slavery, ensuring prompt and appropriate responses.
- **Controlled Entity Reporting:** Requiring controlled entities to report against specific performance measures detailed in our future action plan, fostering accountability and continuous improvement across the group.

## Consultation with Owned or Controlled Entities (Criterion 6)

This statement covers all controlled entities under ROC's group structure. Controlled entities all operate under the direction and governance of ROC and share the same executive management and Board oversight. This structure ensures consistent implementation of modern slavery policies and procedures across all jurisdictions and operations. Consultation with regional offices regarding Tier 1 suppliers and associated spend during 2024 occurred to support the preparation of this statement.

### References

UN. 2011. Guiding Principles on Business and Human Rights. United Nations Human Rights Office of the High Commissioner. New York. Geneva.