

# Rokt'star Handbook

**ROKT**

[rokt.com](https://rokt.com)

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## About the Rokt'star Handbook

Welcome to your Rokt'star Handbook!

In this Handbook, we detail all of our Rokt<sup>1</sup> benefits, policies, guidelines, and procedures we use to unlock the potential of each and every Rokt'star around the world. That's you!

At Rokt we aim to be generous, transparent and of course to ensure we follow all of the legislative requirements in the countries where we have Rokt'stars doing their amazing work.

What do we need from you? We ask that you read, understand, and comply with the provisions within this Handbook while you are working at Rokt. We update our Handbook regularly and the current version will always be published.

Our objective is to provide you with a positive and safe work environment to help you unleash your full potential! Please let us know if something in this Rokt'star Handbook doesn't make sense to you, or if you have any ideas of how to help make Rokt a better place for all. We are always striving to be the best company we can be, so that you may also be your best self at work.

This is a living and breathing document, and we encourage collaboration and feedback in all that we do, including our Handbook. If you have feedback, please let your People Leader know or reach out to a member of the People Team.

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<sup>1</sup> "Rokt" refers to the Rokt Group of companies, including the group parent entity in Singapore (Rokt Pte Ltd), our operating entities in Australia (Rokt Pty Ltd), America (Rokt Corp), Japan (Rokt GK) and the United Kingdom (Rokt (UK) Ltd), along with the OfferLogic Inc. and Calreply Group entities.

# 1. The Rokt Why, How and What

## 1.1. Why, How and What

**WHY - Unleash:** Unleash a world of possibilities

**HOW - Relevancy:** Solve the paradox of choice for customers

**WHAT - Rokt Ecommerce:** Trusted ecommerce marketplace & platform

**For:**

- **Customers:** Unleash relevancy in ecommerce.
- **Ecommerce:** Unleash your business' potential.
- **Brands:** Unleash access to new customers.
- **Rokt'stars:** Unleash your full potential.
- **Communities:** Unleash possibilities.

## 1.2. Our Culture & Values

Here at Rokt, we are a mission-driven, hyper-growth community of curious explorers, intent on unleashing the potential of ecommerce. We are not afraid to venture into uncharted territories, take risks or challenge the status quo; in doing so we either learn or win. We work together as one single aligned team. We value equality, diversity, transparency and smart humble people who enjoy building a disruptive business. We pride ourselves on being a force for good and work towards unleashing potential to make the world simpler and fairer.

**Rokt'stars:**

1. **Are smart with humility:** We are smart people with no ego, who believe we are better together.
2. **Conquer new frontiers:** We are curious explorers always looking for new and better ways.
3. **Own the outcome:** We start with the customer and take accountability for the outcomes.
4. **Enjoy the ride:** We love what we do and thrive on the journey together.
5. **Are a force for good:** We actively invest in our people, our communities and our culture.
6. **Raise the bar:** We consistently set higher standards.
7. **Communicate with impact:** We democratize ideas and scale them with concise written communication.
8. **Disagree then commit:** We respectfully challenge when we disagree and then commit wholly once a decision is made - we call this cabinet solidarity.

## 1.3. Our Values in Detail

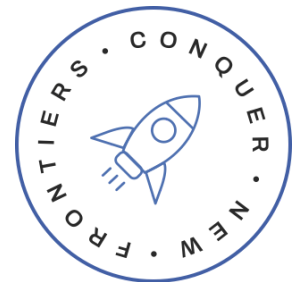
### Rokt'stars are Smart With Humility

- Rokt'stars always seek the truth. We go back to first principles and probe with thoughtful questions to challenge our own beliefs. We use data, knowledge and experience to form opinions, make decisions and preempt market trends & customer needs. We have good instincts and commercial acumen. We are transparent and empower everyone to have an equal voice. We are an ideas meritocracy, where the best ideas always win.
- Rokt'stars value humility. We always acknowledge our mistakes in order to improve and model behaviors of servant leadership for others, putting the team ahead of ourselves.
- **Descriptors:** Humble, Open, Vulnerable, Honest, Data-led, Respectful, Transparent



### Rokt'stars Conquer New Frontiers

- Rokt'stars are curious explorers. We are mission-led and laser focused on turning our vision into reality. We act fearlessly to explore ideas and paths that will get us closer to achieving our vision.
- Rokt'stars win or learn. We actively create an environment where learning, experimentation and risk taking is celebrated. A lot can be learned from real data when we launch a product or initiative. Perfect should never get in the way of progress - speed matters. Many decisions and actions are reversible and do not need extensive study. Achieving our vision requires us to take risks and support others to do the same.
- **Descriptors:** Courageous, Curious, Innovative, Agile, Fast, Tenacious



### Rokt'stars Own The Outcomes

- Rokt'stars act as owners of the company. We accomplish more with less. We have a bias for action, and deliver on our commitments. We build nimble, efficient and flat organizations, with constraints that breed resourcefulness, self-sufficiency and invention. We treat the company's money as if it's our own. We focus on maximizing outcomes. Irrespective of challenges and setbacks, we rise to the occasion. We never say "that's not my job," nor do we ignore smoke.
- Rokt'stars start with the end customer and work backwards. We stay focused on the bigger picture and constantly recalibrate to ensure that our teams are aligned and working on the most important challenges to make our company vision a reality.



- Rokt'stars provide context to empower and encourage ownership. Rokt'stars have the freedom, autonomy and responsibility to act in the best interests of Rokt.
- **Descriptors:** Accountable, Delivery-focused, Detail-oriented

## Rokt'stars Enjoy The Ride

- Rokt'stars are passionate about what they do. We inspire and motivate the heart. We bring meaning and fun to our everyday work lives and celebrate our successes along the way.
- **Descriptors:** Supportive, Appreciative, Humorous and Warm



## Rokt'stars are a Force For Good

- We aspire for Rokt to be a rocketship for all kinds of people. We know our collective strength comes from diversity – diversity of thought, gender, culture, ethnicity, race, experience and socio-economic backgrounds among others – which is why we strive to make Rokt an inclusive space for everyone.
- Rokt'stars have a genuine concern for each other and the world around us. We coach and support Rokt'stars to unleash their full potential.
- We are passionate about making the world simpler and fairer - where everyone feels included, equal and empowered.
- **Descriptors:** Fair, Kind, Caring, Inclusive, Team-oriented, Equitable



## Rokt'stars Raise The Bar

- Rokt'stars are constantly raising the bar in the pursuit of making us all better. We recognize exceptional people and develop and mentor talent. We want to support everyone at Rokt to grow into their best selves and elevate our teams to the next level.
- When there is an issue with anyone at Rokt meeting expectations, we communicate clearly and quickly in a direct and respectful way. We ensure both People Leader and Rokt'star discuss how to address it together. We work together to establish the best next steps.
- Rokt'stars continually raise the bar by developing their skills and abilities. We seek feedback and lean into areas for development.
- **Descriptors:** Challenge, Coach, Discipline, Growth



## Rokt'stars Communicate With Impact

- Rokt'stars are empathetic and active listeners. We always learn and understand before acting. We constantly seek the truth by keeping an open mind and asking questions.
- Rokt'stars use concise written documents to democratize and share ideas, be efficient and create alignment. We clearly communicate our points of view.
- Rokt'stars do not avoid difficult conversations. We actively seek, deliver and act fast on feedback. Rokt'stars provide context, always explaining why a certain decision is best for the business.
- **Descriptors:** Listen, Empathetic, Concise, Direct



## Rokt'stars Disagree Then Commit

- Rokt'stars respectfully challenge decisions when we disagree. We value and respect all voices. Rokt'stars have strong convictions. We do not compromise or avoid uncomfortable conversations when debating what is best for the organization.
- Rokt'stars are candid and direct. We have zero tolerance for gossip and politics. We use facts, knowledge and empathy to make decisions regardless of role or title.
- Once a decision is made, Rokt'stars commit wholly to its success. We call this cabinet solidarity.
- **Descriptors:** Radical Candor, Conviction, Integrity, Committed



## 1.4. Our Commitment to Human Rights

We believe that the world is a better place when everyone is able to reach their full potential. As such we are deeply committed to respecting and promoting human rights as enshrined in the [Universal Declaration of Human Rights](#). We also acknowledge the traditional owners, indigenous, and First Peoples of every nation and community in which we operate.

## 1.5. Our Value Proposition to Rokt'stars

UNLEASH your inner voice. The one that knows you can do it. The one to listen to more. Unleash that desire you've always had to achieve something bigger. Take the leap. Join a team of diverse individuals who thrive by challenging the status quo and working in different ways. Learn, grow, learn some more. Develop your voice, your ideas, your ability to help others – people aren't inspired by job titles, they are inspired by people. Become a leader. Explore possibilities. At Rokt you'll unleash your full POTENTIAL. If you are interested in being part of our journey, find out more at our [culture](#) and [career](#) pages. Come see for yourself.



## 1.6. Work-Life Balance

At Rokt, we consider it essential for all of our Rokt'stars to live a healthy life - where work and personal life are in balance. To help you achieve this we actively support initiatives like blocking off of personal time and ensuring you can completely switch off from work on weekends and when taking time off. To support this, we offer a generous [PTO program](#) including [Bonus PTO](#) (High Five Days), a [Flexible Public Holiday Program](#) as well as the opportunity to take a [Sabbatical](#).

As a global company, meetings with Rokt'stars in other offices can sometimes require slots of time outside of traditional business hours. We appreciate your contribution to these where required, and support you working with your People Leader to manage your time around them. For example, we actively encourage you to block out time in your calendar the following morning when you have been involved in late night calls.

Our People Leaders are encouraged to support you in balancing your schedule.

## 1.7. Better Together

We firmly believe that we are better together. While we are a globally distributed team of Rokt'stars, we care a great deal about personal, human connection and we value spending time together. We are a largely 'in office' culture because we believe that we connect more deeply, innovate faster, and provide better apprenticeship when we are physically together.

Rokt regularly invests in bringing all of our Rokt'stars to one location, despite being a globally distributed company. To this end, new Rokt'stars are regularly inducted globally on-site in New York throughout the year. Connections between departments, even amongst departments located across global locations, create the magic that is Rokt. We encourage you to always ask your People Leader about travel to another office where it will create positive business outcomes as we strongly believe this is core to our success and is a part of who we are.

Rokt invests heavily in face-to-face training and spending time coming together at local celebrations as well as at Rokt's annual company-wide Global Kick Off (GKO) event. In addition, we offer a lot of training and activities focused on further development. We work to create cohorts of all types of groups, including leaders and inductees, so that you may create connections which unlock personal and professional benefits during your journey at Rokt.

## 1.8. Information Security, Privacy and Confidentiality

Rokt sits at the intersection of two data rich environments -- ecommerce and marketing; we are helping to make the relationships between our Rokt Ecommerce clients and their customers a more personal and relevant experience. We also power important advertiser outcomes for our Rokt Ads clients. We also act as a distribution mechanism for providers using Rokt Distributed Commerce. As such, Rokt's continued success relies on ensuring and preserving the ongoing trust between Rokt and our clients, and their end customers. This trust is in the hands of every Rokt'star, every day. Our entire team of Rokt'stars will be asked to undertake compulsory annual training on Information Security, Privacy and Confidentiality as this is fundamental to our success.

### 1.8.1. Client Confidentiality

Confidentiality means, in practice, being highly discretionary about what information you share with others. It means asking ‘does this person *actually need to know this* information’ for us to get the job done; if the answer isn’t a clear “yes”, err on the side of confidentiality. It means making sure you do not inadvertently disclose information, such as by mis-addressing an email, or better still, deciding that you do not need to include confidential information in an email, at all. Ultimately, it means exercising good judgment.

That being said, there are certain mandatory rules regarding Client confidentiality at Rokt which all Rokt’stars must adhere to:

1. **You may not trade the securities of any Rokt Client:** As an employee or contractor of Rokt, you have unique insights into our Clients’ business (including past clients and prospects), much of which is non-public. Using such information to make investment decisions, or sharing such information with family, friends or acquaintances for their own use in making investment decisions, may constitute a violation of law in many of the markets in which we operate. Regardless, it plainly constitutes a violation of our Client’s trust and is not permitted. Before you trade securities of any company (whether buying or selling) you must make a request to the Rokt Legal Team, who will review the request including whether the trade involves a Rokt client or a related party to a client. Note that this does not preclude investments in mutual funds, ETFs, or similar investment vehicles where individual stocks are not bought/sold at your instruction.
2. **Do not share confidential information externally:** More generally, you may not use a Client’s commercially sensitive information for any purpose other than for providing that Client with the best services possible. This means you may not share a Client’s commercially sensitive information with another Client, a potential prospect, or any other third party.

### 1.8.2. Customer Privacy

Concern about data also extends to end-users of the Rokt platform, and any personal information the Rokt platform processes on behalf of clients. We call this realm ‘privacy’. Adhering to Rokt’s position on privacy is a core requirement of your role as it’s of paramount importance to all of our clients and their end customers, this is critical to our role as a trusted intermediary in ecommerce. Rokt’stars must be committed to ensuring personal information is protected. Your responsibilities include the appropriate usage of provided tools and systems to query personal information. E.g., usage is limited to respond to direct consumer or client queries, but excludes personal queries on family, friends, colleagues, etc. Consumer data must never be shared except with the consumer themselves or with the client as contractually required.

As a result, all Rokt’stars must be familiar with, and abide by, Rokt’s Information Security Policies. This is why you will be required to undertake annual training on these requirements.

### 1.8.3. Intellectual Property

Any intellectual property made, developed, or contributed by you in the course of your employment with Rokt remains the property of Rokt.

## **1.9. Dress Code**

Our goal at Roky is to maintain a comfortable, respectful and inclusive environment which is also professional. It is common for us to host clients, candidates and other partners in the office and we want them to always feel comfortable; therefore our official dress code is business casual.

Your choice of clothing reflects on your professionalism in your role and your respect for those you work with. Some points to consider when choosing your work attire:

- If you are in a client-facing role, aim to equal or exceed the dress code of your client.
- Always dress to be ready for an unexpected meeting with a client, candidate or senior representative from a supplier partner.

## **1.10. Feedback Channels**

At Roky, we believe feedback is important to continually 'Raise the Bar' and make Roky the best place to work for all of our Roky'stars. Roky'stars can use a variety of channels to share feedback and suggestions, and we encourage this at all times.

Each quarter, we use the platform CultureAmp to survey all Roky'stars about how you are feeling about Roky, your People Leader and to have an anonymous forum to share feedback. The Engagement Score results and any key insights from this survey are shared with the Roky team, including with our Board, and help inform our People strategy and priorities. We also have a number of 'always on' channels, including the 'Ask Anything - Ideas, Discussion & Learning' chat room and Roky comment box (which can be used anonymously).

Outside of these channels, Roky'stars are encouraged to speak with their People Manager, ExCo members or any member of the People Team. We also provide opportunities for Roky'stars to ask questions directly to the CEO and ExCo during each All Hands meeting, which are held regularly, and during other company events held throughout the year.

## 2. Achieving Results - How We Operate

We hire incredibly talented people (like you!) who care a great deal about delivering extraordinary results. The following section outlines some of the ways that we help create alignment - which ultimately allows teams to operate independently.

### 2.1. Objectives and Key Results (OKRs)

OKRs are a collaborative goal-setting tool used by both teams and individuals at Rokt to set challenging, ambitious goals with measurable results that are aligned to Rokt's mission, vision and company goals.

- An Objective is the outcome to be achieved and typically set collaboratively by teams.
- Key Results (KRs) are measurable milestones that show progress towards achieving an Objective. Effective KRs are specific, time-bound, measurable and verifiable.
- It is common for Objectives to be long-lived while KRs evolve over time as progress is made towards the Objective.

### 2.2. Directly Responsible Individual (DRI)

DRI is the ultimate owner of an outcome on any given project. The DRI can be a leader or individual contributor. The selection of a DRI and their specific role will vary based on their own skillset and the requirements of the project.

- All projects are assigned a DRI who is held accountable for its success (or failure).
- The DRI is empowered to get it done or find the resources and path to get it done.

### 2.3. Lightning Rods

Concise written one-page memos are powerful tools to explain and crystalize an idea. They also help broaden the involvement of others, like team members in other offices. We use Rokt Lightning Rods to make proposals and to share, iterate and align on ideas, principles and concepts. At Rokt, we strive to use clear and simple language which is easy to understand. Where possible, we try to avoid technical jargon which may be unclear or require further explanation.

### 2.4. Delegation Matrix

Rokt's [Delegation Matrix](#) describes the extent to which the Board, CEO, key executives and other Rokt'stars can make contractual or financial commitments on behalf of the company. The Delegation Matrix is periodically updated and approved by the Board. Before exercising a delegation, you must receive training from Rokt Legal, which is made available for eligible Rokt'stars following updates to the Matrix and promotion cycles. Rokt'stars are required to consult this document and work within its guidelines when making decisions or commitments on behalf of the company. If you have any questions, please reach out to Rokt Legal. We always encourage that you check first if you are in any way unclear about whether you have authority to make financial commitments, of any value, on behalf of Rokt.

## 3. Benefits

We value all Rokt'stars and offer a variety of awesome benefits. While some benefits are specific to particular roles and locations, the following benefits are offered to all permanent employees of Rokt:

- [Rokt'star Stock Program](#)
- [Wellness allowance](#)
- [Technology allowance](#)
- Rokt facilitated learning and development programs and a ['LevelUp' allowance](#) for external training, learning and development programs
- [Rokt'star referral program](#)
- Global mobility opportunities
- [Paid Time Off](#), including [Paid Parental Leave](#)
- Rokt'star awards programs
- Lunches, snacks, coffee, and drinks

Your [Employment Agreement](#) or contract with Rokt will include additional details regarding your eligibility for specific benefits.

### 3.1. Time Off Policies

At Rokt, we believe it is essential for all Rokt'stars to take breaks throughout the year to stay refreshed. We also understand there are times when leave is required unexpectedly.

Our success as a team depends on ensuring we have effective coverage for each other when we are away from work - this means clients always get the best experience and teammates are prepared to support each other. To facilitate this, all time off is managed through BambooHR. For part-time Rokt'stars, your time off entitlements will be on a pro-rata basis.

### 3.2. Paid Time Off (PTO)

Your PTO<sup>2</sup> should be covered by the Rokt's policies detailed here, however there can sometimes be variations due to individual contractual commitments and local legislation.

PTO entitlement accruals reset on February 1st each year (the start of Rokt's financial year). The carryover of any unused entitlements from the prior year is limited to 8 days unless otherwise specified by your region's applicable legislation.

With the approval of your People Leader, you may be able to go into a small quantity of negative leave before you are required to take unpaid leave. Your accrued PTO must return to a positive value before you can take any more leave days.

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<sup>2</sup> Referred to as "PTO" in some markets and "Annual Leave" in others.

When leaving Rokt, an eligible Rokt'star will be paid for any accumulated PTO, at their base rate of pay. Similarly, a negative PTO balance on termination of employment will be adjusted through a debit applied to your final termination pay.

### 3.2.1. Public Holidays

We celebrate having a diverse group of Rokt'stars and believe that you should have the opportunity to observe cultural or religious holidays that are important to you. As such, we are proud to offer a Flexible Public Holiday Program (FPHP). Rokt'stars who opt into the program will receive 6 fixed holidays[1] within the [Rokt Holiday Shutdown](#) and are able to select an additional 6 (or 9 if you are based in Japan) days of religious or cultural significance to the communities in which we live and work[2].

On an annual basis between December 15 and January 15, Rokt'stars will be prompted to select the public holidays you wish to observe for the upcoming Rokt fiscal year which starts on 1 February. New Starters who join after the enrollment window has closed and Rokt'stars who do not make an election in the required period will be allocated to the fixed[1] and default FPHP holidays for your region[3], unless they opt out of the FPHP.

In November each year, ahead of the annual election period, Rokt'stars will be able to nominate additional days to be included in the FPHP. These days should be days of religious or cultural significance celebrated or observed in the communities in which we live and work. National holidays from countries where Rokt does not have a presence or professional recognition days are not eligible for the program.

Rokt'stars who opt out of the FPHP will follow the public holidays calendar for your country[4]. In this case, all days not listed as public holidays during the [Rokt Holiday Shutdown](#) period will be automatically deducted from annual leave/PTO.

	USA	AUS	UK	SG	JPN
<b>[1] Fixed Days (within FPHP)</b>	6 Days: December 25 (Christmas), December 26 (Boxing Day), December 27, December 31 (New Years Eve), January 1 (New Years Day), January 2				
<b># Selectable Days (FPHP)</b>	6 Days				9 Days
<b>[2] Selectable Days of Religious and Cultural Significance (FPHP) in addition to the any of the regional holidays listed in [3]</b>	<ul style="list-style-type: none"> <li>• Ashura</li> <li>• Chanukah</li> <li>• Columbus Day</li> <li>• Coming Out Day</li> <li>• Dia De Los Muertos</li> <li>• Diwali</li> <li>• Eid al-Adha</li> <li>• Eid ul-Fitr</li> <li>• Indigenous Peoples Day</li> <li>• Islamic New Year</li> <li>• Juneteenth</li> <li>• Kwanzaa</li> <li>• Lailat al Miraj</li> <li>• Laylat al Bara'at</li> <li>• Lunar New Year</li> </ul>		<ul style="list-style-type: none"> <li>• Mawlid</li> <li>• Night of Destiny</li> <li>• Presidents Day</li> <li>• Passover</li> <li>• Purim</li> <li>• Rosh Hashanah</li> <li>• Shavuot</li> <li>• Simchat Torah</li> <li>• Start of Ramadan</li> <li>• Sukkot</li> <li>• Veterans' Day</li> <li>• Yom Kippur</li> </ul>		
<b>[3] Default</b>	• MLK Day	• Australia Day	• Good Friday	• Chinese New	• Coming of Age

	USA	AUS	UK	SG	JPN
<b>Schedule of Flexible Days (FPHP; for new starters or if you do not select alternate days)</b>	<ul style="list-style-type: none"> <li>• Memorial Day</li> <li>• Independence Day</li> <li>• Labor Day</li> <li>• Thanksgiving</li> <li>• Day after Thanksgiving</li> </ul>	<ul style="list-style-type: none"> <li>• Good Friday</li> <li>• Easter Monday</li> <li>• Anzac Day</li> <li>• King's Birthday</li> <li>• Labour Day</li> </ul>	<ul style="list-style-type: none"> <li>• Easter Monday</li> <li>• May Bank Holiday</li> <li>• Bank holiday for the coronation of King Charles III</li> <li>• Spring Bank Holiday</li> <li>• Summer Bank Holiday</li> </ul>	<ul style="list-style-type: none"> <li>• Year</li> <li>• Vesak Day</li> <li>• Eid al-Fitr / Hari Raya Puasa</li> <li>• Good Friday</li> <li>• National Day</li> <li>• Diwali</li> </ul>	<ul style="list-style-type: none"> <li>• National Foundation Day</li> <li>• Emperor's Birthday</li> <li>• Vernal Equinox</li> <li>• Constitution Memorial Day</li> <li>• Children's Day</li> <li>• Autumnal Equinox Day</li> <li>• Culture Day</li> <li>• Labour Thanksgiving Day</li> </ul>
<b>[4]Public Holiday Calendars (If opting out of the FPHP)</b>	<ul style="list-style-type: none"> <li>• New Years Day</li> <li>• MLK Day</li> <li>• Memorial Day</li> <li>• Juneteenth</li> <li>• Independence Day</li> <li>• Labor Day</li> <li>• Thanksgiving Day</li> <li>• Day after Thanksgiving</li> <li>• Christmas Day</li> </ul>	<ul style="list-style-type: none"> <li>• New Years Day</li> <li>• Australia Day</li> <li>• Good Friday</li> <li>• Easter Monday</li> <li>• Anzac Day</li> <li>• King's Birthday</li> <li>• Labour Day</li> <li>• Christmas</li> <li>• Boxing Day</li> </ul>	<ul style="list-style-type: none"> <li>• New Years Day</li> <li>• Good Friday</li> <li>• Easter Monday</li> <li>• May Bank Holiday</li> <li>• Spring Break Holiday</li> <li>• Summer Bank Holiday</li> <li>• Christmas</li> <li>• Boxing Day</li> </ul>	<ul style="list-style-type: none"> <li>• New Years Day</li> <li>• Lunar New Year</li> <li>• Good Friday</li> <li>• Eid al-Fitr / Hari Raya Puasa</li> <li>• Labour Day</li> <li>• Vesak</li> <li>• Eid-al-Adha / Hari Raya Haji</li> <li>• National SG Day</li> <li>• Diwali</li> <li>• Christmas</li> </ul>	<ul style="list-style-type: none"> <li>• New Years Day</li> <li>• Coming of Age</li> <li>• National Foundation Day</li> <li>• Emperor's Birthday</li> <li>• Vernal Equinox</li> <li>• Showa Day</li> <li>• Constitution Memorial Day</li> <li>• Greenery Day</li> <li>• Children's Day</li> <li>• Marine Day</li> <li>• Mountain Day</li> <li>• Autumnal Equinox Day</li> <li>• Respect for Aged Day</li> <li>• Culture Day</li> <li>• Labor Thanksgiving Day</li> </ul>

### 3.2.2. Bonus Paid Time Off - "Rokt High 5 Days"

We believe it's important for Rokt'stars to take regular breaks. As such, those Rokt'stars who use most of their leave in any given year are eligible for five (5) days of **additional** paid time off, termed High 5 Days. In short, we are rewarding you with more PTO for taking the majority of your PTO in the prior year.

High 5 Days are credited at the commencement of the Rokt Fiscal Year on February 1st for all Rokt'stars who were employed before April 1st of the prior year and finished the prior fiscal year with a PTO balance of 5 days or less.

### 3.2.3. Sick & Carers Leave

There may be times when you, or a family member, aren't well and you need to take some time off. Rokt'stars are eligible to take paid Sick Leave when you are unable to work because of a personal illness or injury (including stress and pregnancy related challenges). You may also take paid caregiver's leave to care for or support a member of their immediate family or household who is sick, injured or has an emergency. The allowance varies by region and is set out in the table below. We always want to ensure that you can focus on what's most important to you at any given time and we encourage our People Leaders to be flexible and generous in supporting you through any personal need that arises.

Please notify your People Leader when you need to take Sick or Carers Leave. Rokt may request that you provide a medical certificate (in accordance with relevant labor laws).



Sick/Carers Leave Allowance	
US, JP, UK	80 hours (10 days) per year, not carried forward
AU	<a href="#">In accordance with Fair Work AU</a>
SG	<a href="#">In accordance with MoM</a>

### 3.2.4. Community Service Paid Time Off

Aligned to Rokt's 'Force for Good' value, we support Rokt'stars who volunteer with community or not-for-profit organizations. Rokt will credit 50% of the time you take to volunteer using your PTO (up to 3 days per year).

Please submit (via email) a summary of the selected volunteer activity for approval from your People Leader. Upon approval, please submit a request in BambooHR and the People Team will adjust your PTO balance accordingly.

### 3.2.5. Compassionate and Bereavement Leave

To offer proper space and time for Rokt'stars to deal with the loss of a family member, Rokt provides the following bereavement leave:

- 5 days for immediate family members (partner, child, grandchild including in-law and step, parent, or grandparent)
- 1 day for indirect family member or close friend

If you have suffered a bereavement, please reach out to your People Leader or a member of the People team who can provide appropriate support and ensure this leave is captured in BambooHR. We always want to ensure that you can focus on what's most important to you at any given time and we encourage our People Leaders to be flexible and generous in supporting you through any personal need that arises.

### 3.2.6. Pregnancy & Parental Leave

Rokt'stars are eligible for parental leave if you or your partner are due to give birth or adopt a child after 8 months of employment. Eligibility for parental leave is as follows:

- **Pregnancy Leave:** Birth parents are offered 10 calendar weeks paid Pregnancy Leave (to be taken as a single block) to be used between 4 weeks prior to birth date and to be completed no later than 12 months after the birth date of the child.
- **Parental Leave:** All parents, including birth parents (additional leave), non-birth parents and adoptive parents, are offered 6 calendar weeks paid Parental Leave (to be taken as a single block) to be used between 4 weeks prior to birth date or adoption and to be completed no later than 12 months after the birth date or adoption of the child.

Birth parents are entitled to access both Pregnancy Leave and Parental Leave. For part-time Rokt'stars, your Pregnancy and Parental Leave entitlements will be pro-rata based on the average percentage of FTE worked in the 12 months prior to commencing leave.

Pregnancy and Parental Leave, as applicable, will run concurrently with any government paid parental leave programs. This means if you live in a country where a statutory parental leave



benefit is available, you will be required to claim statutory parental leave pay (if eligible), and Rokt will supplement any gaps.

In addition to the above, Rokt'stars are eligible to take unpaid parental leave up to 12 months following the birth or adoption (or 24 months if you are located in Australia). To the extent that government paid parental leave extends beyond the period of Rokt's Pregnancy and/or Parental Leave, you may continue to receive government paid parental leave during periods of unpaid leave from Rokt.

The following table summarizes the treatment of various entitlements during Pregnancy, Parental and unpaid parental leave:

	Pregnancy Leave	Parental Leave	Unpaid Parental Leave
<b>PTO and other statutory leave entitlements</b>	Continue to accrue	Continue to accrue	Do no accrue
<b>Vesting of employee equity awards</b>	Uninterrupted	Paused for periods of Parental Leave	Paused for periods of unpaid parental leave
<b>STIP or commission payments (if applicable)</b>	Paid based on the prior two quarters of performance with a cap at 100%	Pro-rata adjustment based on the duration of the leave	Pro-rata adjustment based on the duration of the leave
<b>Sign-on bonus payments (if applicable)</b>	Continue per the original schedule	Paused	Paused
<b>Travel allowances (if applicable)</b>	Paused	Paused	Paused
<b>Telephone and Wellness allowance</b>	Able to be utilized	Able to be utilized	Not able to be utilized
<b>RTA and Level-Up Allowance</b>	Able to be utilized subject to People Leader approval	Able to be utilized subject to People Leader approval	Able to be utilized subject to People Leader approval

We understand that complications during pregnancy, birth and/or adoption can occur and that Rokt'stars may have many different caregiving situations (e.g. shared caregiver arrangements). We endeavor to support Rokt'stars in these situations and encourage you to discuss your specific circumstances with your People Leader, 2-Up People Leader or someone in the People Team including the Chief People Officer. We want you to have access to someone you feel comfortable

talking to about any family health or caregiver challenge that arises. Rokt's parental leave policy extends to parents who suffer a stillbirth or death of their baby.

Please reach out to a member of the People Team to confirm your Parental Leave arrangements, and ensure it is accurately recorded in BambooHR, ideally at least 4 weeks prior to the start of leave.

### 3.2.7. Rokt'star Sabbatical

To celebrate our longer tenured Rokt'stars we launched Rokt'star Sabbatical so that you can take paid extended leave to go and do what is important to you. More time with family? A travel adventure? Whatever appeals most to you - we'd love to see some photos while you're away enjoying your well earned break! That is why we offer a paid Rokt'star Sabbatical Leave for all eligible Rokt'stars. The payments and time available will depend on the Rokt'stars tenure with Rokt and are detailed in the table below.

Tenure Required	Calendar Weeks Available (to be taken as a single block)	Payment (% of Fixed Annual Remuneration "FAR")
5 years	4 weeks	100%
6 years	6 weeks	100%
7 years	7 weeks	100%
8 years	8 weeks	100%
9 years	9 weeks	100%
10 years	12 weeks	100%

Sabbatical leave needs to be requested and approved by your People Leader and your 2-Up People Leader, with at least 3 month's notice so the business can prepare for the time you're away. Sabbatical leave must be taken at one time (i.e. as a single block) and can be combined with other types of leave.

During Sabbatical leave:

- PTO and other statutory leave entitlements will continue to accrue;
- Rokt'stars may utilize their Wellness Allowance;
- People Leader approval is required to utilize Required Technology Allowance (RTA), or Level-Up Allowance;
- Vesting in relation to employee equity awards will be paused for all periods of sabbatical leave; and
- STIP, sign-on payments and/or commission payments will be adjusted based on the duration of the leave.

For the purposes of assessing eligibility for Sabbatical leave, tenure is adjusted for part-time arrangements and/or periods of unpaid leave. Tenure calculations will reset to zero once a Rokt'star utilizes Sabbatical Leave, and in the case of Rokt'stars who leave and rejoin the company.

The Rokt'star Sabbatical leave operates as an extension of long service leave entitlements in relevant geographies. Where regulated benefits are more generous or regulation restricts enhancing a long-service leave entitlement, then the regulated program will replace the Rokt'star Sabbatical leave program.

### **3.2.8. Jury Duty**

If you are called to attend a court for jury duty, please record the leave as 'Jury Duty' in BambooHR. Rokt will cover up to a maximum of 5 days or the minimum legal requirement in each jurisdiction as paid leave. Please present your People Leader with the court summons to record this leave. You are not expected to work whilst you are attending court.

### **3.2.9. Rokt Holiday Shutdown**

All Rokt offices close for a period in late December / early January each year so the Rokt team can collectively enjoy a period of time off where all Rokt'stars are able to unplug, shut down their devices, and recharge. Please refer to [Public Holidays](#) for information on how this period interacts with PTO and public holidays.

In 2023/2024, the Rokt Holiday Shutdown will run from December 23rd, 2023 through to January 7th, 2024. Where business requirements necessitate, certain teams or Rokt'stars may agree to alternate arrangements during and around the Rokt Holiday Shutdown. The People team and the relevant ExCo member need to be consulted in all cases where alternative arrangements are agreed.

## **3.3. Unpaid Leave**

Periods of unpaid leave may be approved for many reasons, for example, to have the trip of a lifetime, build your dream house, pursue further education, care for a loved one, or support a spousal initiative.

Unpaid leave needs to be approved by your People Leader and your 2-Up People Leader.

During Unpaid leave:

- Rokt'stars who receive health benefits will continue to receive these benefits during their leave but will not be able to utilize Wellness, Required Technology (RTA), or Level-Up Allowances while on unpaid leave;
- Leave accruals will be paused;
- vesting in relation to employee equity awards will be paused; and
- STIP, sign-on payments and/or commission payments will be adjusted based on the duration of the leave.

### 3.4. Work Travel

Prior to booking work-related travel, you must get approval from your People Leader, and if required, your 2-Up People Leader as detailed in [Rokt's travel policy](#). Please familiarize yourself with [Rokt's travel and expense policies](#) prior to booking or commencing any work travel.

Once your trip is approved, record your travel dates in BambooHR via the 'Work travel' category in the Time Off section. This information is integrated with Rokt's company calendar and enables us to better respond and support Rokt'stars in cases of emergency.

### 3.5. Working Arrangements & Flexibility

At Rokt, we believe spending meaningful time together in person improves our ability to solve problems collaboratively, to move quickly, and to support one another. This results in a stronger culture & business and has been a key part of Rokt's success to date.

All Rokt'stars are expected to work in person, in the office, at least three days per week. From the end of September 2023, expectation will increase to four days per week. We support this by investing in great workspaces and by providing lunches and an array of snacks and refreshments in the office.

Recognising the diverse and global nature of our team and business, Rokt'stars are eligible to Work from Anywhere (WFA) for 1 week each quarter. To utilize this benefit, please submit a leave request in BambooHR using the 'Work from Anywhere' category, which will be approved by your People Leader.

We understand the circumstances of each Rokt'star are unique and for many having some flexibility in work arrangements (whether occasional, temporary or more permanent) is valuable. We trust you to be professional, use good judgment (taking into account the needs of your team as well as your own needs), and clearly communicate regarding where and when you will be working.

Rokt supports flexible working arrangements, and we will aim to accommodate all requests where possible. If you have specific flexibility requirements, please discuss them with your People Leader or a member of the People team. While each arrangement must receive specific approval by the 2-Up People Leader (such that it works for the Rokt'star, their team and the business), below are some examples of the types of arrangements we have supported in the in the past:

- Working from a different Rokt office on a temporary or permanent basis (driven by professional or personal reasons).
- Working part-time. We have supported this at all levels of the business.
- Time in lieu as recognition for a period of intense or out of hours work, or where a Rokt'star has simply gone above and beyond. This is commonly used when someone wants or needs to work above and beyond to get a project finished (e.g. the support team during GKO and the finance team during audit/year-end).
- Flexible working hours to meet personal or professional needs. This is sometimes related to a role requirement (e.g. to support another time-zone) but also may be due to personal

needs. We try to structure these arrangements such that they still provide for significant overlap in the office with your team.

When working outside the office, including when WFA, please ensure your team knows how to contact you and that you are available for important meetings as you would be if you were in the office during normal working hours. Please also ensure you have access to excellent WIFI when you are working from outside the office.

### **3.6. Training and Development (LevelUp! Allowance)**

Your professional development is important to us. At Rokt we believe the only way we will unleash the potential of our business is by unleashing the potential of every Rokt'star. It's for that reason we strive to create industry leading Learning & Development opportunities for every employee. This ranges from monthly leadership training, bi-monthly All Hands sessions, renowned guest speakers, an annual company-wide conference (GKO) and a constantly updated library of onboarding and functional training solutions.

The Rokt LevelUp! program provides Rokt'stars an allowance to engage in external training and development programs of your choice, with the approval of your People Leader.

Rokt'stars who join Rokt on or after August 1 are entitled to 50% of the year's allowance. Rokt'stars do not need to take PTO while undertaking 'LevelUp' training but please ensure you notify your People Leader and team members if you will be unavailable for an extended period. Allowance usage is based on the dates of the training. 100% of any unused allowance can be carried forward to the next year (up to a cap of twice the annual allowance). Refer to [Appendix 1.1](#) for Allowance Amounts.

### **3.7. Wellness Allowance**

To support Rokt'stars remaining happy and healthy, Rokt offers a monthly allowance (see [Appendix 1.1](#)) that can be used for health and wellness related activities. Common uses of the Wellness Allowance include:

- Joining a social club with 4 or more other Rokt'stars in your office (2 or more Rokt'stars in small offices)
- Gym membership or group fitness classes
- Bicycle sharing schemes such as 'CitiBike'
- Online health classes (Peloton, Yogaworks etc.)
- Mental health programs including counseling services (or co-pays), subscriptions such as Headspace, Down Dog or Simple Habit, or meditation classes
- Home exercise equipment and hardware

If you are unsure whether something would be eligible for the Wellness Allowance, please check with your People Leader.

Unused Wellness Allowance does not carry over from month to month and reimbursement claims (with supporting receipts) are required to be submitted in Expensify at least quarterly.

### 3.8 Mental Health Support

Rokt'stars have free access to the Modern Health wellness platform, which offers extensive resources to support wellbeing and mental health. This platform is completely confidential.

Rokt sponsors the following for each Rokt'star:

- 6 x 1:1 sessions with certified mental health, professional, or financial well-being coaches;
- 6 x 1:1 sessions with licensed clinical therapists;
- Unlimited group support sessions called Circles;
- Guided meditations & self-paced digital courses

To access the Modern Health wellness platform:

- Download the Modern Health app on your mobile device or go to [my.modernhealth.com](https://my.modernhealth.com)
- Sign up with your work email and Rokt as your company name.
- Answer a few questions about your well-being, needs, and preferences.

### 3.9. Required Technology Allowance (RTA)

At Rokt, you have the option to purchase your own work devices, including laptops. The Rokt Required Technology Allowance (RTA) is provided to assist with the cost of such purchases.

You have the option of whether you decide to take this allowance up or not. In the case where a Rokt'star decides not to take up this option, then there will be no allowance, and a desktop will be provided by Rokt.

Please see the section in [Technology and Communications](#) for further details.

### 3.10. Phone Allowance

Every Rokt'star is expected to have a mobile phone.

Rokt'stars have the option to utilize corporate phone plans in most markets, and can be coordinated by your local Office Champion. The corporate plan will offer you free roaming, international calls (in your home country) and all calls during all travel but may require you to change your current mobile phone provider.

If you have a pre-existing plan, you are not obliged to join the corporate plan, but you are required to be accessible when traveling. Rokt provides a phone allowance while traveling but you will be responsible for all charges in excess of this amount. Rokt does not pay break fees for existing contracts. However, the purchase of a new or buy-out of an existing handset can be claimed against your [RTA allowance](#).

If you choose not to join the corporate plan, Rokt reimburses the cost of the monthly usage up to the amounts found in [Appendix 1.1](#). Phone expenses for plan coverage and phone purchase costs that are billed monthly as part of your plan are covered by this policy.



## 4. Compensation and Contracts

### 4.1. Employment Agreements

All permanent Rokt'stars have an Employment Agreement that details the specific terms and conditions of your employment. Any changes to your employment arrangements will be documented by the People Team and communicated to you. Your Employment Agreement and all other relevant documents will be stored in BambooHR.

### 4.2. Salary and Payroll

All information about your compensation, including pay schedule can be found in the 'Job' tab in BambooHR. You will be given access to the relevant payroll system by the Finance Team where you can view your payslips.

Rokt strives to pay all Rokt'stars accurately and on time. We also have an obligation to withhold certain amounts from your paycheck as dictated by applicable state/federal legislation or otherwise required by law. If you have questions about your wages, including any concern that improper deductions have been made, please reach out to the People Team or Payroll Team.

### 4.3. Short Term Incentive Program (STIP) and Commissions

Roktstars may be eligible to participate in a Short Term Incentive Program (STIP) based on their role and level as detailed in the [Career Ladder](#). Rokt's Short Term Incentives including commissions are separate incentive programs that are detailed in the [Career Ladder](#) but are collectively referred to as STIP.

If you are eligible to participate in a STIP, the specific details will be set out in your Employment Agreement (or other document) or [Career Ladder](#) and it will be reflected in your BambooHR records. All STIP awards are at the complete discretion of Rokt and are subject to change at any time. You must be a current Rokt'star to be eligible to receive STIP payments.

In most cases, STIP payments are determined at the end of each fiscal quarter and paid on the last day of the month following the end of quarter (i.e. May 31st for Q1). There are some senior Rokt'stars whose STIP is an annual bonus plan that will be paid in March for the prior Rokt Fiscal Year.

### 4.4. Retirement, 401K and Pension Programs

Rokt offers pension benefits that vary based on place of employment. These benefits are designed to meet or exceed local legal requirements.

- **Australia** - [Super guarantee percentage](#) of monthly salary and STIP contributed to your designated fund for Superannuation, subject to [contribution caps](#).
- **Singapore** - 17% of monthly salary and STIP contributed for [CPF](#), subject to caps.



- **United States** - Rokt offers a 100% match of 401k salary contributions, up to 4% of a Rokt'star's FAR and subject to [government caps](#). 401k benefits are managed through Slavic, and Rokt'stars can opt in or out through Justworks (Benefits -> Retirement Planning).
- **United Kingdom** - Rokt'stars and ROKT each contribute 4% of the Rokt'star's monthly salary to their pension scheme with Scottish Widows, subject to caps. Rokt'stars can only opt out of the scheme after joining and are eligible for a full refund of contributions if you opt out within 30 days of joining.

## 4.5. Long Term Incentive Program (LTIP): Rokt'star Stock Program

We believe ownership is important and so we strive to provide an opportunity for all Rokt'stars to become owners of ROKT. This is a value we take seriously, and so more than 20% of ROKT fully diluted stock is held by current and former Rokt'stars (this is over and above shares held by founders).

The Rokt'star Stock Program, known as the 'Long Term Incentive Program' (LTIP) is designed to provide an opportunity for all Rokt'stars to share in the value created at ROKT. New Rokt'stars will receive an invitation to participate in the LTIP typically within the first 3 months of starting at ROKT. After 12 months of tenure, Rokt'stars are assessed for annual refresh grants in December each year. The issuance of stock invitations and the vesting and other conditions are at the discretion of the ROKT Board of Directors and the terms and conditions are set out in the Rokt'star Stock Program Rules.

## 4.6. Rokt'star Referral Program

We value it when existing Rokt'stars recommend candidates for open roles. ROKT offers a referral bonus for successfully hired Rokt'stars who you refer. All referral bonuses are paid at the end of the month following the new Rokt'star's start date.

Referral bonus payments are only made to Rokt'stars employed at the time of payment in situations where there are no other fees (e.g. recruiter fees) associated with the hire. The following Rokt'stars are not eligible to participate in the Referral Program:

- Level 6+ Rokt'stars;
- Members of the recruiting team;
- People Leaders for roles that have either a direct or indirect report line to the People Leader.

Referral bonus amounts are in [Appendix 1.1](#).

To submit a candidate, please use [Workable](#) to search for open job postings and submit referrals directly. You can also track the status of your referrals through the same system. Once a referred candidate is successfully hired, referrals will be approved and recorded in BambooHR by the People team. Any referrals recorded in BambooHR will be tracked and paid out as per the above timeline. If you do not see a referred candidate on your profile in BambooHR, please ask your People Leader or People team to submit a request via BambooHR.

## 5. Technology and Communications

### 5.1. Software Systems

Rokt uses a number of systems that vary by department. We use Google Workspace as our core productivity suite, Workday as our financial information system and BambooHR as our people information systems.

### 5.2. Required Technology

Protecting customer and client information is critical to Rokt's ongoing success. Therefore a key requirement when you join Rokt will be complying and agreeing to Rokt's information security policies. Below are current minimum requirements for Rokt Required Technology.

Minimum Device Specifications		
Laptops		
Department	Engineering, Design, Business Analytics	All other departments
Model	Apple MacBook Pro	Apple MacBook Air
CPU	Apple Silicon <sup>3</sup> required, Apple M2 or above preferred	
RAM	24GB RAM	16GB RAM
Storage	512GB SSD storage	256GB SSD storage
Operating System	macOS version equal or newer than two generations back <sup>4</sup>	
Mobile Phones/Tablets		
<ul style="list-style-type: none"><li>Allowed are any Apple iOS and Android devices with operating support provided by the manufacturer (e.g., availability of regular updates and security patches). A strong preference is for Apple iOS devices.</li><li>Devices must not be rooted or jailbroken and apps must only be downloaded through the official Stores (e.g., Apple App Store and Google Play Store<sup>5</sup>). Mobile phones must be capable of running Rokt apps or mobile-site functionality.</li></ul>		

<sup>3</sup> The term 'Apple Silicon' refers to the [ARM-based CPU technology](#) introduced by Apple in November 2020. Compatible devices are marketed as Apple M1, M1 Pro, M1 Max, M2 Pro, and M2 Max chips. Older Macs come with an Intel x86 CPU architecture (e.g., Intel Core i5 or i7).

<sup>4</sup> [Find out which macOS your Mac is using](#)

<sup>5</sup> Engineers are allowed to install and test work-related apps outside of these official sources (e.g., Mobile SDK team).

### **5.2.1. Allowance and Reimbursement (RTA)**

All Rokt'stars will be given an initial Required Technology Allowance (RTA) on their start date, and an annual RTA 'top-up' will be added to the account to help fund the ongoing costs of maintaining and upgrading your required technology at the start of each Rokt Fiscal Year. Allowances are cumulative, without expiry, and roll over year on year.

For new employees, your first annual RTA top up will generally be a pro-rata amount based on when you joined Rokt and received your initial RTA allowance (e.g., if you start on August 1st, you will get the initial allowance at that time; your account then will be topped up with 6 month's worth (50%) of the annual allowance at the start of the Rokt Fiscal Year on February 1st).

Once you have been employed for more than 12 months, any unused allowance at the time of employment termination will be paid as a taxable bonus to the individual in their final salary payment. For Rokt'stars who terminate (voluntarily or involuntarily) within 12 months of employment, any unused allowance at the time of employment termination will not be paid out. The allowance is also not accessible to Rokt'stars upon the announcement of their termination.

Rokt will reimburse claimable RTA expenses via the monthly expense reimbursement process. Reimbursements will only be allowed for expenses incurred in the current financial year, e.g. you will not be reimbursed after February 2023 (Rokt Fiscal Year commences on February 1st) for an expense that was incurred in 2022. Reimbursements will not be paid out until your work devices are compliant with the requirements in this policy.

Refer to [Appendix 1.1](#) for allowance amounts.

### **5.3.4. Responsibilities**

You will own your equipment and can, for instance, sell it or take it with you when you leave Rokt. However, this also means you are responsible for the maintenance and operational ability of the equipment.

### **5.3.5. Fixed Equipment**

Any fixed equipment and accessories for use in the office (i.e. monitors, cables, keyboards, mice) that may be provided by Rokt must not be removed from offices. Please contact your local Office Champion to inquire about which items your office has available. Other accessories should be purchased using your allowance or out of your own pocket.

### **5.3.6. Rokt Provided Hardware**

While Rokt rarely issued devices, devices provided by Rokt will be replaced approximately every three years. Please note that Rokt-provided devices are for business use only, and no personal data should be stored on them. While devices are insured by Rokt, if a second device needs to be replaced within a 12-month period, the Rokt'star will be responsible for 50% of the replacement cost.

## **5.4. Rokit Communications and Meeting Guides**

The Rokit 'Communication' and 'Meeting' guides have been developed to improve how we manage communications and meetings at Rokit. They include best practices and well-researched recommendations for how best to interact across teams, divisions, departments at Rokit, including when working with geographically diverse teams and/or navigating challenging time zones. We encourage you to build them into how you work and hope you find these useful.

The Rokit Communication Guide can be found in [Appendix 2.1](#),

The Rokit Meeting Guide can be found in [Appendix 2.2](#).

## **5.5. Content Creation Guide**

The Rokit Content Creation Guide summarizes the best practices and recommended structure of content creation at Rokit, and can be found in [Appendix 2.3](#). This ensures consistency across teams, departments and geographies, and makes it easier to discover and access content across the organization.

## 6. Travel and International Mobility

We firmly believe that we are better together and that in-person interaction boosts innovation, creates meaningful relationships, and provides opportunity for apprenticeship. With offices, Rokt'stars and partners located around the world, most Rokt'stars will have requirements to travel for work during their tenure.

We expect Rokt'stars to exercise good judgment (particularly as our policies will never cover all scenarios) and act as if you are spending your own money. If you need guidance, please discuss with your People Leader before incurring an expense.

The Rokt Travel Policy provides guidance for [standard business travel expenses](#). In addition, certain employees may have Travel and/or Relocation Allowances. If you are eligible for one of these allowances, it will be specified in your Employment Agreement.

### 6.1. Travel Policy

#### 6.1.1. Flight Costs

When you need to fly, Rokt'stars are expected to use flights that will result in the lowest overall cost incurred by the business.

Rokt'stars in levels 6 through 8 are eligible to fly Premium Economy, while Rokt'stars in levels 1 through 5 should reference the flight allowances listed in [Appendix 1.1](#). Note that the allowances reflect the roundtrip cost inclusive of taxes, and are dependent on the one-way scheduled flight time.

United Airlines is Rokt's preferred airline partner and we have access to promotional rates. Rokt also gets additional value as an incentive from United Airlines as part of this relationship. You may choose to fly a different airline if there is a cheaper and better travel option for your requirements. To be considered a cheaper option, the alternative flights need to be 25% cheaper than the lowest United Airlines fare using a Google Flight search.

For travel on United Airlines, your flights will be booked centrally by our internal travel team after you have received travel approval in BambooHR. For travel on other airlines you should book directly once you have received travel approval and seek reimbursement via Expensify.

If it is not possible to find flights within the stated benchmark limits (as set out in [Appendix 1.1](#)), and the travel is not time sensitive, consider traveling at a time when costs are more affordable.

#### 6.1.2. Accommodation Costs

For group travel, including Induction, GKO and event travel, accommodation will be booked by Rokt and you do not need to book separate accommodation.

For other types of travel, you should book your accommodation directly after you have received travel approval. If you choose to stay with friends or family for multiple nights, you may take your

hosts out for a meal and expense the reasonable costs of this meal. We expect Rokt'stars to exercise good judgment in these circumstances.

If it is not possible to find accommodation within the stated limits (as set out in [Appendix 1.1](#)), and the travel is not time sensitive, consider traveling at a time when costs are more reasonable. Particularly for New York City, hotel rates can vary widely from week to week.

#### **6.1.3. Meals**

While traveling for work purposes, Rokt'stars are entitled to claim reimbursement for your meals. Allowable claims are capped at the daily rate listed in [Appendix 1.1](#) and include taxes and tips. Please ensure you capture tips, which can be handwritten on an itemized receipt.

Note: Client and Team Entertainment expenses are covered under a separate policy.

#### **6.1.4. Ground Transport**

When traveling, Rokt'stars are entitled to claim reimbursement for ground transport incurred for business purposes. Rokt'stars are expected to use any reasonable mode of transportation that will result in the lowest overall cost incurred by the business, and where possible, public transportation is greatly encouraged.

For travel to and from the airport, taxis or ride share services may be utilized where public transportation is not convenient or practical. Where you are traveling with other Rokt'stars, including to client meetings, we encourage you to ride together where possible.

When visiting another Rokt office, we ask that you travel by public transportation to commute between the office and their hotel, unless it is not practical (please discuss with your People Leader and request approval in advance where this is the case).

#### **6.1.5. Phone Expenses - International Travel**

You are entitled to claim the amount listed in [Appendix 1.1](#) when you are traveling to another country.

If you are US based and travel overseas often, we recommend that you consider joining Rokt's corporate T-Mobile plan (see '[Phone Allowance](#)' section). This provides you with unlimited international calling, data roaming and telephone calls when you are in another country.

#### **6.1.6. Incidental Travel Expenses**

Other incidental costs incurred when traveling for work purposes are required to be approved by your People Leader prior to submission for reimbursement via your expense claim for the month.

#### **6.1.7. Expenses Due to Trip Extensions**

If you are required to stay in the city of travel over a weekend and into the next week for business purposes, Rokt will reimburse your accommodation costs over the weekend. However, if you choose to stay additional days in the city of travel for personal reasons, then your accommodation costs will be at your own expense. Should the associated flight cost for your return at the end of the extension fall outside the allowed policy, you will be responsible for the difference.

## 6.1.8. Non-Expensable Examples

As stated above, we expect Rokt'stars to exercise good judgment and act as if you are spending your own money. The following are examples of expenses which are non-reimbursable:

- Membership fees to airline frequent flier groups
- Fines for traffic violations while on Rokt business
- Damages to a Rokt'star's vehicle while on Rokt business
- Loss of, or damage to, any personal property while on Rokt business, including phones, headphones and laptops (unless covered by [Rokt's Travel Insurance](#) policy)
- Purchase of any form of insurance during travel (Rokt has a [corporate Travel Insurance](#) policy as above that includes rental car coverage)
- Purchases of clothing and other personal items such as haircuts, toiletries, newspapers, magazines, tobacco, alcohol etc.
- Purchase of in-room movies and entertainment
- Medical expenses (unless covered by [Rokt's Travel Insurance](#) policy)

## 6.2. Travel Approval and Booking

As a general rule we ask that you use common sense and act in the best interests of the business when booking travel. If your travel dates are flexible, please consider planning your travel when it is most cost effective. We also expect Rokt'stars will exercise good judgment and factor in your time and productivity when selecting flights and hotels.

We use United Airlines to be our preferred travel partner.

### 6.2.1. Approval

Where approval is required, travel must be approved before any commitment or booking is made. The approvals required are based on the total estimated cost of the trip including flights, hotels, ground transportation, meals and taxes. We ask that all Rokt'stars act as business owners and make choices about travel expenditure as if you are spending your own money. No approval is required for day trips.

Travel approval requests should be made via the appropriate travel approval form which can be accessed from your profile in BambooHR.

To make the approval process efficient for all, we ask that you include an estimate of the total trip cost, attach a link to a Google Flights search (excluding any filters) for estimated flight costs and note whether hotels or flights exceed benchmark rates. If either flights or accommodation exceed benchmark rates, consider adjusting travel dates if possible or seek other alternatives.

Total Estimated Travel Cost (USD)*	Action	Bamboo HR Request Form	Approvals Needed
Day trips	Book trip	Travel Day Trip (for booking United Flights)	None

Total Estimated Travel Cost (USD)*	Action	Bamboo HR Request Form	Approvals Needed
<=\$5,000	Request approval to book	Travel Standard	People Leader
>\$5,000	Request approval to book	Travel High Cost	People Leader & 2-Up People Leader

*\*Includes estimated costs for flights, accommodation, ground transportation, meals and taxes*

Please note for group events where a specific travel budget is set (e.g. GKO), expenditure above the budget will not be reimbursable.

### 6.2.2. Booking Via Rokt's Internal Travel Team - United Flights

For travel on United Flights, Rokt's internal travel team will receive a notification once your travel has been approved and will proceed to book your flights directly in order to access discounted rates, utilize centrally managed payment methods and access incentives from our partners.

### 6.2.3. Booking Your Own Travel - Accommodation & Non-United Flights

Travel booked directly is subject to the same approvals and requirements. Rokt'stars are required to use the regular expense reimbursement process via Expensify.

## 6.4. Relocation Allowances

As a result of our global presence, Rokt may offer opportunities for you to transfer to another Rokt office, permanently or temporarily. When the relocation is at Rokt's request, temporary and permanent relocation support is offered. Both new and current Rokt'stars that request to relocate voluntarily are typically not eligible for relocation support. Refer to the Rokt [Career Ladder](#) for potential Relocation Allowance amounts.

When you relocate between Rokt entities, for the purposes of existing allowances and PTO accruals, you will be treated as if you were terminated in the old Rokt entity and re-hired in the new Rokt entity. This means that all relevant allowances and balances will be settled in the old entity as if you were departing Rokt, and you will receive all relevant allowances in the new entity as if you were a new starter. Your tenure will continue to reflect your original hire date so that LTIP vesting and eligibility for the Sabbatical program remain unaffected.

### 6.4.1. Voluntary Relocation Requests

Rokt'stars are welcome to express a desire to relocate to an alternative Rokt office. When such requests are made, we will consider a variety of factors including the business merits, immigration requirements, level and tenure and performance. Where Rokt is able to support a voluntary relocation request, the terms and conditions for your transfer will be agreed between yourself, your future People Leader and 2-up People Leader. Voluntary relocation requests are subject to



approval from the relevant ExCo Leader. Rokt'stars are responsible for their own relocation costs when voluntarily relocating and no allowances are provided, although we will assist with visa support.

If Rokt agrees to a relocation, the terms of your relocation and new employment details (including compensation and benefits) will be set out in a new employment agreement. In most instances, your employment will be subject to the governing laws, entitlements, and benefits of the new Rokt location.

#### **6.4.2. Rokt Requested Relocation Allowances**

Where the relocation is at Rokt's request, we will provide a Relocation Allowance to be used for expenses incurred in the relocation. The nature of the relocation will inform the size and form of the Relocation Allowance, if any.

Employees who are relocating for a period less than 6 months are not entitled to a Relocation Allowance and the [Travel Policy](#) will apply. Relocations for periods between 6 months and two years, are considered 'Temporary Relocations' and Rokt'stars will be entitled to a monthly Relocation Allowance as detailed in the [Career Ladder](#).

In both of the above scenarios, there is an expectation the Rokt'star will return to their prior role (or equivalent) at their original location at the end of the assignment.

Relocations for periods exceeding two years are considered 'Permanent Relocations' and Rokt'stars will be entitled to one-time Relocation Allowance as detailed in the [Career Ladder](#). In these scenarios, there is no expectation the Rokt'star will return to their prior role (or equivalent) at their original location.

If a Temporary Relocation is extended and becomes Permanent, you may be eligible for an additional one-time relocation allowance with the approval of your 2-Up People Leader.

In addition to the Relocation Allowance, visa support and one-way flights for you and your immediate family to your new location are provided. You are responsible for all other costs relating to the relocation (e.g. managing your personal tax).

Permanent Relocation Allowances will be paid as taxable income in a lump sum payment within the first month following the relocation. Temporary Relocation allowances will be paid as taxable income in normal payroll cycles for the duration of the temporary relocation.

If Rokt agrees to a relocation, the terms of your relocation and new employment details (including compensation and benefits) will be set out in a new employment agreement. In most instances, your employment will be subjected to the governing laws, entitlements, and benefits of the new Rokt location.

#### **6.4.3. Clawback**

All relocation allowances, bonuses, and Rokt borne expenses will be subject to clawback (as legally permitted) as follows:

- 100% clawback if employment ends within 0 - 6 months of relocation.
- 50% clawback if employment ends within 6 - 12 months of relocation.

## 6.5. Travel Insurance

Rokt has a group travel insurance policy through Chubb Insurance. This insurance covers the movements of all Rokt'stars when traveling for business. Specifically, it covers travel involving a destination fifty kilometers or more from the Rokt'stars normal place of business or residence. Cover commences from the time you leave and continues on a full-time twenty-four (24) hour basis until you return

Our insurance covers among other things medical expenses, personal liability, emergency evacuation, and accidents. If you have specific coverage questions, please reach out to the Rokt Legal Team.

- [Claim Form](#)
- 24/7 Emergency Contact number -
  - Australia: +61 2 8907 5995
  - Singapore: +65 6836 2922
  - United Kingdom: +44 203 538 7228
  - United States: 1-800-682-4822

## 6.6. Visa and Permanent Residency

While Rokt provides support for visa and permanent residency applications, it is your responsibility to ensure you have a valid visa and/or right to work at all times.

### 6.6.1. Visa or Permanent Residency Applications

If eligible, Rokt will nominate you for/apply for a visa required for you to gain or renew employment authorization. Should a Rokt'star incur costs related to obtaining the employment pass or visa, you will be entitled to reimbursement.

Rokt will cover the following costs for you and your immediate family members:

- Visa issuance fees
- Visa interview fees
- Employment pass application
- Employment pass cards
- Medical testing related specifically to the approval of employment passes or visas.

If you want to change your status to permanent residency and subject to the approval of your 2-Up People Leader, Rokt will cover additional immigration (visa/lawyers/applications) costs up to an allowance maximum (refer to [Appendix 1.1](#)). To be eligible for this benefit, you must have been working for Rokt for 2 years in the relevant country, be in good performance standing and be eligible for the visa you wish to apply for.

Costs relating to visa or permanent residency applications may be subject to clawback if you leave Rokt within 12 months of obtaining the Visa or Permanent Residency and will be detailed in a letter provided by the People team.

### **6.6.2. Travel related to Visa or Permanent Residency Applications**

Rokt does not cover travel costs relating to visa renewals or permanent residency applications unless the Rokt'star is required to travel internationally for work purposes within six months of visa expiry. In these cases, the Rokt'star should seek to renew their visa during this trip (e.g. if the Rokt'star is going to a GKO event within six months of visa expiry, then renewal should be done at that point in time). Rokt'stars are responsible for any incremental costs associated with your trip to meet your visa renewal requirements.

If it is not possible to book your visa renewal travel in conjunction with a planned work trip, you will be responsible for covering the costs of your visa related travel entirely.

Rokt'stars are responsible for making their own consulate appointments to renew visas. We understand that there are currently extensive wait times for visa renewal appointments in certain locations and Rokt'stars should plan ahead where possible. To the extent you have any concerns about obtaining a visa renewal, please discuss with a member of the People team.

All visa related travel where you will be working remotely or expensing any travel related costs are subject to 2-Up People Leader approval and approval by the Chief People Officer. Any costs incurred by Rokt relating to the renewal of your visa may be subject to clawback.

Where visa renewal travel is approved, you are expected to work remotely during this time in the timezone of the office they are employed through (and should be recorded in BambooHR as Out of Office) or alternatively, the Rokt'star should submit a leave request.

### **6.7. Global Kick Off (GKO)**

Global Kick Off is an annual company-wide event where the Rokt team comes together at one location to bond, learn, and prepare as a team for the upcoming fiscal year. The cost of attendance is covered by Rokt. Further details and requirements surrounding GKO will be provided to you in writing by the Rokt People Team. Attendance at GKO is mandatory, unless a dispensation is provided to you in writing by the Chief People Officer and your People Leader, in which case you may be asked to utilize your PTO/Annual leave for the duration of GKO.

## 7. Expenses

### 7.1. Expenses Platform

Rokt uses Expensify as our expense reimbursement tool.

Expensify allows Rokt'stars to capture expense details as and when they occur. Expensify is set up so that your expense claims go immediately to your People Leader for approval. Once approved, the claim will automatically be sent to the Finance team for review and processing. It is the responsibility of both the Rokt'star and their People Leader to ensure that expense claims are complete and adhere to our policy.

Your submission must include fully detailed receipts and pre-approvals (if applicable). We ask both Roktstars and People Leaders who approve expense claims, to ensure all expenses have appropriate supporting documentation and are coded to the proper categories, including properly splitting between Travel and Relocation Allowances (if applicable). Expenses submitted over 60 days after the incurrence of the expense may be rejected to comply with local regulations.

Once reviewed by the Finance team for policy adherence, claims will be included in payroll for the relevant month. Employees are reimbursed monthly and complete and approved expense claims should be submitted prior to the 10th of each month.

### 7.2. Submission Detail

While the procedure for the submission and payment of expense claims within Rokt varies region to region, in general, all expense claims must contain the following details:

- Pre-approvals attached for out-of-policy items from someone with a [financial delegation](#)
- Date of expense
- Total in original currency, including prevailing local taxes, tips etc.
- Name of vendor
- Category of expense (i.e.: travel, entertainment, phone etc.)

Certain additional requirements for Australia and APAC regions are required for tax purposes as outlined in [Appendix 1.2](#).

Only one expense report should be submitted per month.

### 7.3. Multiple Party Expenses

#### 7.3.1. Client Meals, Entertainment. and Gifts

When meeting with clients, Rokt'stars can claim entertainment costs incurred for both themselves and their clients within the Rokt approved thresholds listed in [Appendix 1.1](#). These spending limits include meals and beverages, prevailing taxes and tips. In most instances, Rokt'stars should not outnumber clients. Only one team member should submit the claim on behalf of the entire team and in all cases this should be the senior-most team member present.

Client Meals and Entertainment require the following additional information for expense reimbursement:

- Tag (i.e.: your team)
- Business purpose
- Name of client (where applicable)
- Number of meeting attendees, both client and Rokt'stars (where applicable)

Client gifts are managed centrally by Rokt's Marketing team. If you wish to arrange gifts for a client, please submit a ticket to the Marketing Service Desk. Client gifts purchased individually are not eligible for reimbursement.

### **7.3.2. Team Building**

We believe it's important to facilitate opportunities for teams at Rokt to get together to celebrate significant milestones, including when a team member joins or departs, when teammates are visiting from other offices, and/or when the team has completed a significant project. People Leaders have access to team building budgets for these occasions which are subject to the thresholds listed in [Appendix 1.1](#). Only one team member should submit the claim on behalf of the entire team and in all cases this should be the senior-most team member present.

### **7.3.3. Employee Gifts**

Rokt provides onboarding, birthday, anniversary and newborn gifts to make our Rokt'stars feel valued and appreciated, enhance their experience and reinforce our commitment to Enjoying the Ride! These gifts are managed centrally by the Employee Experience team.

People Leaders should consult a member of the Employee Experience team in your local office to arrange a condolence gift if a member of your team, or a member of their immediate family, has suffered a significant injury, illness or loss.

Rokt'stars, at their discretion, may wish to use personal funds to organize a gift or celebration to acknowledge an important milestone for a colleague (e.g. graduations, engagements, weddings, baby showers, etc.). Rokt'stars are not eligible to expense these gifts for their team members or colleagues.

## 8. People and Behavior

### 8.1. Personal Details

Rokt'stars are responsible for keeping their personal details and contact information in the 'Personal' section in BambooHR up to date, including your emergency contact information.

### 8.2. Professional Development

Your continuing professional development is extremely important to us. We want to provide you with opportunities to develop broadly, including in areas that may not be a strength for you, as well as recognize the things you already excel at.

While Rokt has a variety of structures, programs and processes to support the ongoing professional development of every Rokt'star, we encourage you to take an active role in managing your growth and development. In addition to formal performance evaluations and discussions, you are encouraged to have an ongoing dialogue/discussion with your People Leader, and other senior leaders in the business, about your development aspirations, needs and achievements, and pathway for growth. Ultimately, you are the master of your destiny - and we are here to support it as much as we can, within the parameters of the Rokt business, present and future.

#### 8.2.1. Formal Development and Training

Each Rokt'star is strongly encouraged to meet with their respective People Leader to discuss their performance on a quarterly basis at a minimum. The emphasis will be on fostering discussion between Rokt'star and People Leader and setting key focus areas and goals for the coming 3 months.

These conversations are great opportunities to discuss how you may leverage [LevelUp! Program](#) for external training that supports your development goals.

#### 8.2.2. Informal Development and Training

Rokt has a strong culture of continuous on-the-job learning. As pioneers in our field, tackling outsized goals in tight timeframes, you may sometimes find there is no manual or instruction book! But figuring things out is often part of the fun! (And maybe you are just the person to write the instruction guide for the next person coming along.)

The senior leadership team, and your fellow Rokt'stars alike, have a truly diverse and deep range of profiles, backgrounds, qualifications, and experiences. We encourage you to get to know other Rokt'stars and their stories - these can provide unique opportunities for personal growth for everyone.

### 8.2.3. Professional Membership Fees

In the case where a Rokt'star incurs professional membership fees relevant to a qualification required to meet their job description, you will be entitled to reimbursement for said fees. Rokt'stars must obtain their ExCo member's approval for these fees prior to first claiming them.

## 8.3. Organizational Structure Guidelines

Rokt aims to keep its organization flat to allow for faster communication and decision making. As such, we apply the following organizational structure guidelines wherever possible:

- Teams (People Leader and direct reports) of less than 5 people are avoided.
- We aim for People Leaders to have between 6 and 10 direct reports.
- People Leaders own the day-to-day people issues of hiring, performance management, onboarding and offboarding (leveraging the support of the 2-Up People Leader, where relevant).
- There can be a functional directly responsible individual (DRI) that provides the day to day direction to coordinate a set of activities (e.g. a big client, project, skill specialty - legal or design) that sits outside the people management structure.
- Generally, we avoid dual and dotted reporting lines as they slow down decision making and create a need for a lot more coordination.

We prioritize having local People Leaders which sometimes means these organizational guidelines can not be met.

### 8.3.1. Rokt Career Ladder

Rokt has a transparent and fixed Career Ladder. This means that any Rokt'star can see the compensation and career expectations for every role in the company and can feel confident they are remunerated fairly. We decided to do this because we believe that being transparent serves two purposes for us:

1. It makes outcomes fairer. Two individuals doing the same role in the same location receive the same remuneration. When we adjust remuneration, both existing and new Rokt'stars doing the same role will get the same adjustment.
2. We avoid the noise, distraction and negotiation that commonly occurs when compensation is a 'secret' or obscure. We hope the Career Ladder gives each Rokt'star clarity in what you need to do to advance in their careers and it focuses efforts on personal development.

Rokt is a company that prides itself with looking from within first as it looks to fill new requirements. Our Career Ladder, which includes remuneration and requirements for all standard roles, is open for all Rokt'stars to view and visualize their next career step, remuneration and the steps required to achieve it.

The Career Ladder is updated quarterly and available on the shared Google Drive 'Published Policies'.

## 8.4. Performance Management

Performance management is a continuous process of improving performance by setting clear performance expectations (that are aligned to the goals and strategic plan of the organization), reviewing and assessing progress, and developing Rokt'stars to deliver against these performance expectations.

When you are not performing at your best, it can impact your job satisfaction, Rokt, your morale, and the morale of others. Rokt recognizes that for any number of reasons there may be times when your performance or conduct may fall below our expectations. We are committed to the support and development of our Rokt'stars and as such, all issues surrounding performance, conduct or capacity that require improvement will be proactively addressed. Performance management is one of the more formal feedback mechanisms we use to ensure you know how you are performing to assist you to reach your potential.

For the purposes of this policy, performance management focuses on **managing sub-par performance relating to work, acceptable and unacceptable behaviors, and misconduct**. This policy applies to all Rokt'stars and outlines the steps that we will take in the case where your performance or conduct does not meet Rokt's expectations.

## 8.5. Performance Review Cycles

The purpose of the Performance Review cycle is to ensure that the objectives, contributions, and development of our Rokt'stars are aligned with organizational goals and the overall performance of Rokt. It is also a great time to have a focussed conversation with your People Leader about your personal development and career goals (although we encourage these to always be ongoing as per [Professional Development](#) section).

At Rokt, performance is assessed two times per year - at the end of our first and third quarters (i.e. April, and October). Rokt'stars and their People Leader each reflect on the previous 6 months and input those reflections into the Culture Amp Performance Management Platform. People Leaders also record their team member's performance in Culture Amp. Rokt holds People Leader Calibration sessions twice per year to ensure performance is being assessed consistently and fairly across the whole company. For any promotion recommendations, we require People Leaders to collate feedback from other Rokt'stars who work closely with the individual as part of the submission.

Outside of these cycles, Rokt'stars can initiate documented feedback requests through Culture Amp at any time. The feedback can be kept private for each Rokt'star to review, or you can choose to share this feedback with their People Leader.

## 8.6. Rokt'star Behavior

At Rokt we enjoy coming together to connect and do business. In addition to day to day workplace interactions and meetings or calls, we host regular All Hands Meetings, end of week celebrations (including Duck Friday in Sydney) and TGIF (Thank Goodness it is Friday) in New York), end of quarter events and an annual, whole team Global Kick Off event.



Rokt expects that all Rokt'stars will conduct themselves in a professional and respectful manner at all times when interacting with others (internally and externally) and when managing colleagues. All Rokt'stars should consider their own behavior and the impact that this can have on others. Rokt has a framework of 8 [company values](#) (Conquer New Frontiers; Smart with Humility; Own the Outcomes; Raise the Bar; Disagree then Commit; Customer Obsessed, Force for Good and Enjoy the Ride) and associated behaviors we expect to be displayed and adhered to in our workplace community. Details can also be found in the [Career Ladder](#) document distributed to all Rokt'stars internally and updated each quarter.

### **8.6.1. Romantic Relationships at Work**

It is extremely important that all Rokt'stars feel safe and comfortable at Rokt. We do not prohibit romantic relationships. We understand the workplace can be a common place for friendships and relationships to arise, and there are Rokt'stars who are in appropriate consensual relationships.

If you are in, or enter into, a consensual relationship with a colleague, you are required to notify the People Team, who will keep it confidential and only share with others as necessary. We need to be aware so we can handle any potential conflicts of interest.

People Leaders are not permitted to initiate romantic relationships with a direct or indirect report. Pre-existing relationships that are disclosed are allowed. If you are unsure about how to navigate a situation, talk to the People Team.

We expect our Rokt'stars to treat each other with respect. If you want to express your interest in a colleague, it is important to ensure you do not do so in a manner that would embarrass or pressure them or invade their privacy. It is also essential that you respect their choice if they decline your overture or otherwise suggest, directly or indirectly, your interest is not reciprocated. At Rokt, you may express your romantic interest to a colleague only once and if they do not respond affirmatively, you may not ask again.

If a colleague is persistent about initiating a romantic relationship with you, you should feel free to make it clear to them that you are not interested and inform your People Leader and/or People Team. If you feel in any way uncomfortable about the unwanted approaches, please reach out to the People Team and/or your People Leader for support.

You should immediately alert the People Team and/or your People Leader if anyone at Rokt or a person in the workplace makes unwanted sexual advances to you or a colleague. Sexual harassment is prohibited and is subject to disciplinary action. For more details on what constitutes sexual harassment and how to report it, please refer to our [Bullying and Harassment policy](#).

### **8.6.2. Unacceptable Behaviors**

Rokt does not tolerate unacceptable behavior (including bullying, harassment, and retaliation) in any form. Unacceptable behavior may involve actions, words or physical gestures that could reasonably be perceived to be the cause of another person's distress or discomfort. Bullying or harassment may be by an individual against an individual or involve groups of people. Rokt defines behavior as being unacceptable if:

- It is unwanted by the recipient,

- It has the purpose - or effect - of violating the recipient's dignity and/or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- Considering the totality of the circumstances, including the recipient's perception, it was reasonable to expect the behavior to have that effect.

Unacceptable behavior is not limited to face-to-face interactions. It may take many forms, such as written, telephone or e-mail communications, the sharing of images, communication during video calls, text/chat messages or through social media (including communications with third-parties).

Any external party (i.e. someone who is not an employee of Rokt, e.g., a customer, a supplier or a visitor) who behaves in an unacceptable manner should be reported to your People Leader and a member of ExCo immediately. They will determine an appropriate course of action to deal with the issue alongside the People Team.

Some examples of unacceptable behavior include but are not limited to:

- Aggressive or abusive behavior, such as shouting or personal insults
- Spreading malicious rumors or gossip, or insulting someone
- Discrimination or harassment when related to a protected characteristic
- Unwanted physical contact
- Stalking
- Offensive comments/jokes or body language
- Publishing, circulating, or displaying pornographic, racist, sexually suggestive, or otherwise offensive material or pictures
- Isolation, deliberate exclusion, and/or non-cooperation at work
- Persistent and unreasonable criticism
- Unreasonable demands and impossible targets
- Coercion, such as pressure to subscribe to a political or religious belief

## **8.7. Serious Misconduct**

Rokt may decide to immediately terminate your employment without performance management should you participate in an activity classed as serious misconduct. Termination of employment for serious misconduct will result in the discontinuation of your participation in the Rokt'star Stock Program (in accordance with the Plan Rules), among other things. 'Serious Misconduct' is regarded as misconduct that involves one or more of the following:

- Willful or deliberate behavior that is inconsistent with the continuation of the contract of employment,
- Conduct that causes imminent and serious risk to the health and safety of others; or
- Conduct that causes a threat to the reputation, viability or profitability of our company.

The following actions may, given the specific circumstances, constitute serious misconduct (the list is not exhaustive):

- Failure to utilize 2-factor authentication on work email systems,
- Breach of confidentiality or data security, including the unauthorized disclosure of Company business to the media or any other party (this rule does not apply to making, in good faith, a protected disclosure (whistleblowing),
- Unauthorized access to or use of computer data or computer hardware,

- Unlawful discrimination, harassment or bullying (refer to the [Bullying and Harassment Policy](#)),
- Theft, dishonesty and/or fraud,
- Fighting, assault, act of violence or aggression,
- Unacceptable use of obscene or abusive language (including language of a discriminatory nature),
- Gambling, bribery or corruption (refer to the [Anti-bribery and Anti-corruption Policy](#)),
- Consumption of illicit drugs (other than medically prescribed drugs) or being intoxicated (with either illicit or legal substances) during working hours,
- Willful damage to Rokt's property or the property of its Rokt'stars or customers, suppliers or business partners,
- Falsification of records or other Company documents, including those relating to obtaining employment,
- Serious insubordination,
- Refusing to commit to a lawful and reasonable instruction that is consistent with your contract of employment,
- Serious breach of Rokt's policies or procedures,
- Bringing Rokt into disrepute,
- Serious negligence which causes or might cause unacceptable loss, damage or injury; or
- Conviction of a criminal offense (except for minor road traffic offenses) that impacts on your suitability to do your job or your relationship with Rokt, your work colleagues or Rokt's customers, suppliers or business partners.

## 8.8. Communication of Issues

If you are having problems at home or work which are affecting your ability to perform, we encourage you to talk to us about it.

Similarly, if you are unclear about our expectations and standards, please speak to your People Leader or People Team partner. We would prefer that you come to us so we can do what we can to help you to understand our business expectations.

## 8.9. Breaches and Reporting

Everyone has a responsibility as part of their employment to adhere to our policies. If you are concerned that a policy has been breached, you should report your concerns to your People Leader or People Team partner.

Please refer to the [Grievance Policy](#) for the process and procedures that may be followed to manage breaches of this policy.

## 8.10. Code of Conduct

Rokt aspires to conduct its business in accordance with uncompromising ethical standards and in full compliance with all laws and regulations. Accordingly, we expect all Rokt'stars to act responsibly and with integrity. This includes an expectation that all Rokt'stars are familiar and comply with the Rokt Code of Conduct set out below.

### **8.10.1. Drug and Alcohol Use**

We want to promote a safe and productive working environment for all Rokt'stars. This policy outlines our expectations for behavior at the workplace, during onsite and offsite events and while traveling for work, and clearly defines our expectations for Rokt'stars related to alcohol, smoking and drug consumption. Rokt'stars who are found to have violated any of these policies are subject to discipline up to and including termination.

Whenever Rokt'stars are working on Rokt premises or are conducting company-related work offsite, you are prohibited from:

- Using, possessing, buying, selling, manufacturing or dispensing an illegal drug.
- Being intoxicated, whether from alcohol, cannabis or other recreational drugs or any illegal drug.

Any illegal drugs or drug paraphernalia found in or on any Rokt property or leased event space will be turned over to an appropriate law enforcement agency and may result in criminal prosecution.

At Rokt sponsored events, everyone has a responsibility to promote a safe and productive work environment. Where alcohol is served, Rokt'stars are expected to exercise good judgment and consume alcohol responsibly. Rokt does not tolerate conduct that is inappropriate, endangers the safety of others, or violates internal Rokt policies or the local laws. Excessive consumption of alcohol, as well as underage consumption, is not permitted when you are attending a Rokt-related event, whether onsite or offsite.

People Leaders are responsible for ensuring that company-sponsored events, whether onsite or offsite, are safe. People Leaders are expected to ensure teams are aware that excessive drinking is not permitted and to discourage overconsumption, as well as to address inappropriate conduct that violates our policies. The People Team also has a responsibility to respond if they are aware of excessive drinking or other behavior that is a violation of policy.

Smoking (including cannabis) is prohibited in any part of the office (including outdoor rooftops or terraces) at all times. This includes the use of devices that resemble and operate like an actual cigarette, including but not limited to cigarettes, cigars, e-cigarettes or other vapor smoke devices.

Rokt'stars who violate the code of conduct may be subject to discipline up to and including termination and, in certain situations, may be subject to civil or criminal penalties. Rokt'stars must notify the Chief People Officer of any violation occurring in the workplace. Upon confirming a violation took place, Rokt may discipline the offending Rokt'star and/or require the Rokt'star to participate in a rehabilitation program.

#### **8.10.1.1. Potential Actions**

Each Rokt'star is expected to play a role in creating a safe workplace culture. If you see or experience something that doesn't feel right, please speak to either a member of the People Team, ExCo, or your People Leader.

Additionally, if we have reasonable suspicion that a Rockstar is under the influence of drugs and/or alcohol and such influence could adversely affect the Rokt'star's job performance or

anyone's safety, we may be entitled to request an alcohol and/or drug screening for the Rokt'star as allowed under local law.

#### **8.10.1.2. Resources Available to Rokt'stars**

We recognize that drug, alcohol or substance addiction can be an illness. Rokt has resources to help, including referrals to drug counseling services, rehabilitation programs and other employee assistance programs. If you are in need of any of these services, please connect with the People Team.

#### **8.10.2. Other Policies**

In addition, all Rokt'stars are subject to the following policies:

- [Anti-discrimination and Equal Employment Opportunity Policy](#)
- [Bullying and Harassment Policy](#)
- [Grievance Policy](#)
- [Workplace Safety Policy](#)
- [Anti-bribery and Anti-corruption Policy](#)
- [Anti-slavery and Human Trafficking Policy](#)
- [Compliance with Laws](#)
- [Conflict of Interest](#)

In any instance when a Rokt'star displays unacceptable behavior, please report the matter to your People Leader or a member of ExCo so that an appropriate course of action can be taken. (See [Serious Misconduct](#) above).

## 9. Exiting the Company

Rokt is growing fast and sets a high bar on performance and behavior. Our core 'why' is to unleash potential - so we work hard to ensure every Rokt'star is set up for success. For most, this will mean a lot of growth and success at Rokt - however for some there will be better paths elsewhere and this is OK. When this happens, we do our best to set up the departing Rokt'star for success in whatever they do next.

### 9.1. Principles

We apply the following principles when a Rokt'star departs the business:

- **No surprises:** Exits should not come as a surprise to the individual. All Rokt'stars should understand how they are performing and what is expected of them. Rokt will actively explore other options when Rokt'stars are struggling to meet the requirements of their current role. People Leaders should not avoid difficult conversations.
- **Lead with Empathy:** Compassion and respect are important as they enable departing Rokt'stars to move on with dignity. Be clear and transparent on the reasons for termination. Respect their privacy when they depart.
- **Fair:** Fairness and consistency is important to ensure that we treat people in the same way.
- **Communicate with your team:** Ensure you communicate the departure to the respective teams that the Rokt'star worked with. Be straightforward while also respecting the departing individual's privacy.
- **Partner with your People partner:** Enlist your People partner to help you manage the process and answer questions as they arise. Your People partner should always be in the room when you are terminating someone - this helps both the departing Rokt'star and their People Leader.

### 9.2. Types of Exits

- **Involuntary With Agreement:** A Rokt initiated termination or redundancy where we enter into a separation agreement.
- **Involuntary Without Agreement (For Cause):** Rokt initiated termination for cause and/or where we cannot agree to separation conditions.
- **Voluntary:** Rokt'star initiated resignation

### 9.3. Involuntary With Agreement

Rokt aims to create a fair and respectful experience for Rokt'stars at all times, including when they are leaving Rokt. We understand that some decisions to leave are initiated by Rokt, and in those situations we are going to try and help create a bridge for the departing employee to find their next opportunity. In this process, we also want to ensure we create the least amount of disruption to the rest of Rokt.

### 9.3. Involuntary Without Agreement (For Cause)

Our objective is to avoid these types of exits. However, in rare cases we have situations where we need to terminate for cause and/or we can not reach an agreement on terms of separation. Employees should review the rules of the Rokt'star Stock Program to understand the implications of a for cause termination on any equity grant a departing employee may have received.

### 9.4. Voluntary Exit

Should you make the decision to resign from your role at Rokt, please provide a letter of resignation to your People Leader and the People Team within the timeframes in your employment agreement.

### 9.5. Final Arrangements

On or prior to your final day, the People Team will conduct an exit interview, and we will ask you to complete a brief survey. The in-person conversation will help us learn about your experience at Rokt, as well as help you manage benefits transition and any of the requirements to ensure a smooth transition for all parties.

### 9.6. Final Payment and Expenses

The payment of final wages, expenses and any other adjustments will be completed via standard payroll, on the last working day of the month, unless the local labor laws of your country or state of employment require a different arrangement.

If you have incurred any expenses during your final month of employment that are claimable under Rokt's Expense Policies laid out in the [Technology](#) or [Travel](#) sections, you must submit your claim report via Expensify to obtain your People Leader's approval prior to your last working day.

### 9.7. Rokt'star Stock Program

If you have any vested equity you are considering exercising, *and* are still eligible to so according to program policies, please contact your Finance and People Team representatives for next steps.

### 9.8. Contact Information

Please ensure your personal contact information (email, phone and mailing address) is updated in BambooHR and Carta before you depart so you can access payslips, year-end tax statements (where applicable) and details of any vested equity (where applicable). This will also ensure Rokt can communicate with you in the future regarding any potential transactions or events impacting your vested equity.

### 9.9. Technology and Security

If you have any existing software subscriptions under Rokt's name, you must ensure the license keys are removed from your computer and phone before you leave. Any Rokt phone plans must

be canceled, and access passes to Rokt buildings must be handed to the Office Champion or People Leader before you leave.

## **10. Rokt People Leaders**

We take leadership really seriously at Rokt. When you take on People Leadership responsibility, your impact significantly increases. As such, we want to ensure our People Leaders are set up for success. We have created this guide to ensure that we treat all our Rokt'stars in a consistent and fair way, while empowering our People Leaders to independently act when managing people. If you are unsure of any aspect of your managerial role or need to seek clarification, you should contact a member of the People Team.

### **10.1. Principles Behind Rokt's Approach to People Leadership**

Understanding some of the key principles often provides more guidance - than policies - when dealing with People Leaders' discretion and how to deal with unique situations that leading people inevitably leads to.

#### **10.1.1. People First**

People Leaders should always put people first when thinking about the right way to handle a situation. At Rokt, this means treating people in the same way that you would want to be treated - with respect, directness, fairness, honesty, and transparency. This does not mean compromising Rokt's mission or drive to achieve results.

New people leaders may confuse this with guidance to always deliver good news when providing feedback. However, this approach is misguided because it can deny Rokt'stars actionable and useful feedback which will help them become the best version of themselves - and ultimately this is not people first.

#### **10.1.2. We Thrive Together**

As a global organization, one of the toughest things to manage is bridging the tyranny of distance that exists between our various teams and offices. We have an ambitious vision and, to make it a reality, we need to solve a lot of complex problems. This is a problem for any global organization but for one moving as fast as Rokt it can be an outsized challenge.

Bringing people together as much as we can ensures people have the opportunity to learn, build relationships and develop empathy for others. It also strengthens our culture and performance as a business. This is why we invest heavily in opportunities for Rokt'stars to come together as often as possible and why we do not support full-time work from home.

This principle also ensures we operate in a way that is fair and equitable across teams and regions. We realize when teams operate to different standards it creates tension and means people are less likely to go the extra mile for each other.



## 10.1.3. Show, Don't Tell

One of the most important aspects of leadership is the example you set. Telling people to do something (e.g. follow these policies) but not demonstrating the same behavior yourself is a recipe for a cynical, disengaged and poorly performing team. Your team will learn what 'great' looks like by watching you - so every word you say and action you take matters.

## 10.1.4. Relentlessly Evaluate Leadership

Building teams and developing people is a continuous process that happens at both the macro and micro levels of ROKT, day in and day out. It also takes courage and focus to give honest feedback about where ROKT'stars are succeeding, and where they may need to improve. It's important to have the courage to act if such improvement is not forthcoming. Rarely does a team or a people problem fix itself and we expect our People Leaders to be courageous and decisive.

People Leaders should be self aware about their own strengths and areas for improvement when it comes to leading teams and people. It takes a willingness to acknowledge that if the team is not functioning as well as it might, the problem may lie not with the team, but with your ability to motivate and direct the team as effectively as possible.

## 10.2. People Processes and Approaches

At ROKT, we have two tiers of people that can access our core systems:

1. ROKT'stars: ROKT'stars are internal team members. ROKT'stars are treated the same irrespective of employment instrument - full-time ROKT'stars, part-time or contractors.
2. Externals with Limited Access (Embedded Externals). Embedded Externals require access to our office and/or systems as part of the services they provide to ROKT (e.g. IT support, recruiters, etc.). Embedded Externals are a valuable part of the broader ROKT business but do not participate in a lot of the ROKT training events (e.g. GKO and induction), do not need Sensitive System Access and will not be People Leaders. Sensitive System Access is defined as admin access to any system, access to client data, or access to developing environments for our core systems. Anyone who requires sensitive system access should go through the full ROKT'star process.

We have people processes that span from hire to exit and are relevant for every ROKT'star at some point during their time at ROKT. For ROKT'stars, our approach is agnostic to the employment instrument, structure, or location of the role. We believe this is critical to preserve and build the culture we all love at ROKT.

There are two broad concepts we use for the approvals in our people processes to ensure we can execute quickly but also maintain and build our capability:

- **2-Up:** All people management decisions must involve a discussion with, and approval from, the 2-Up People Leader. A 2-Up process essentially means that if you are the direct People Leader for a ROKT'star, when making significant people decisions (including hiring, performance management, terminations, etc.) you must discuss and get approval from your immediate People Leader. We do this so that our People Leaders get the opportunity to receive advice from more senior people leaders, and so develop into better People Leaders

themselves with practice and mentorship through real situations. This also ensures that significant people management decisions always involve more than one person.

- **Bar raiser:** Bar raisers are senior managers across the business who have been trained to ensure that every person we bring into Rokt increases the capability of the team, and that role levels are being applied uniformly across Rokt. We do a bar raiser interview for every new hire into Rokt. The bar raiser interview is conducted by someone outside of the department of the role the candidate is applying for.

For those in the External Embedded category, an ExCo interview is done to check for alignment to values instead of a bar raiser interview. Other recruiting and onboarding processes are the same - including background checks.

In addition to External Embedded, Rokt engages other External Service Providers to provide us services who typically do not require access to our offices or core systems to perform these services. In general, these External Service Providers are engaged through an entity (vs. as an individual contractor) and have a tightly defined scope of work and delivery timeframe (e.g. penetration testers, auditors, brokers, travel agents, etc.). Rokt undertakes a diligence process before engaging any External Service Provider and Legal reviews and signs off on the contractual terms of these engagements. Unless an individual employed by one of Rokt's External Service Providers requires access to our core services, and therefore is classified as an External Embedded, background checks and values interviews are typically not required.

### **10.2.1. Rhythm and Frequency of People Processes**

Generally speaking, People Leaders should think about people management as a daily task - not something that you do twice a year before formal performance evaluations - but rather the fulfillment of a mutual contract with our Rokt'stars. This mutual contract is one where our Rokt'stars commit to building Rokt's success and where we (as People Leaders) commit to helping them grow and support their development

In addition, People Leaders are encouraged to discuss and review individual development plans and objectives (e.g. detailing growth and performance objectives using [SMART](#) Goals) with team members as often as makes sense for the individual.

We also encourage our Rokt'stars to be the CEOs of their own career, seek out development conversation time with your People Leader and request whatever feedback and resources you need to be successful in your role, to meet your ambition for growth.

More detail on the frequency and cadence of formal People Processes can be found in the ['Performance Review Cycles'](#) section.

### **10.2.2. Setting SMART Goals**

All performance expectations should be set using the OKR framework to define what 'success' looks like for the individual team member. Once determined, all objectives should be written as SMART objectives:

- **Specific:** we need to reference a specific result we are trying to achieve,

- **Measurable:** the outcome needs to be measurable in an objective way,
- **Agreed:** agreed with the People Leader and 2-up People Leader.
- **Realistic:** not easy, should include stretch but they need to consider resourcing and other requirements and objectives; and
- **Time bound:** these need to be delivered by a specific date and the measurement period should also be specified (by default we use the end of quarter as the delivery date and the last month as the measurement period).

## 11. Appendix

### 11.1. Appendix 1.1 - Expenses and Allowance Amounts

We expect Rokt'stars to exercise good judgment (particularly as the policy will never cover all scenarios) and act as if you are spending your own money. All amounts are inclusive of tax unless otherwise stated. Refer to the relevant sections for more details.

Allowance	US (USD)	AU (AUD)	NZ (NZD)	SG (SGD)	UK (GBP)	JP (JPY)
Referral bonus <i>- Rokt'stars L1 to L5C are eligible for Referral bonuses. Referral bonuses are based on the home office of the referring Rokt'star. - People Leaders are not eligible for referral bonuses for direct and indirect reports</i>	\$3,000	\$3,000	\$3,000	\$3,000	£2,000	¥300,000
LevelUp! per annum	\$5,000	\$5,000	\$5,000	\$5,000	£3,500	¥500,000
Mobile phone allowance per month <i>- In the US we have a corporate plan that you can access</i>	\$50	\$50	\$89	\$50	£35	¥5,500
Social/wellness allowance per month	\$75	\$75	\$75	\$75	£58	¥7,895
<b>T&amp;E policy (Budgets based on the destination of your travel)</b>						
Accommodation per night <i>- Inc tax. Note that some locations and websites initially quote the rate excluding tax</i>	\$400	\$350	\$350	\$350	£300	¥40,000
Mileage reimbursement <i>- When using own car, per km</i>	<a href="#">IRS</a>	<a href="#">ATO</a>	<a href="#">IRD</a>	\$0.60	<a href="#">GOV.uk</a>	¥60
Travel meals per day <i>- Including tax and tips</i>	\$100	\$100	\$100	\$100	£70	¥10,000
International phone allowance per day <i>- Note for US we have a company plan and can provide a SIM if you are regularly traveling to the US</i>	\$5	\$5	\$5	\$5	£4	¥600
Client meals and entertainment per person <i>- There should be more clients than Rokt'stars</i>	\$120	\$100	\$100	\$100	£80	¥10,000
Team building per person per quarter	\$80	\$80	\$80	\$80	£60	¥8,000

Allowance	US (USD)	AU (AUD)	NZ (NZD)	SG (SGD)	UK (GBP)	JP (JPY)
Return Flight Benchmark and 'in policy' amounts (flight duration as scheduled each way)						
Levels 2-5 (economy seats)						
< 7 hours	US\$1,000 return / US\$500 one way					
7 - 12 hours	US\$2,000 return / US\$1,000 one way					
>12 hours	US\$3,000 return / US\$2,000 one way					
Levels 6+ (premium economy seats where available)*						
< 7 hours	US\$1,500 return / US\$750 one way					
7 - 12 hours	US\$3,000 return / US\$1,500 one way					
>12 hours	US\$5,000 return / US\$2,500 one way					
Required Technology Allowances (RTA) by Function						
Engineering, Design, Analytics, and/or Level 6 and above						
RTA Initial Allowance	\$2,700	\$3,600	\$3,900	\$3,600	£2,300	¥340,000
RTA Top-up Allowance	\$1,350	\$1,800	\$1,950	\$1,800	£1,150	¥170,000
All other departments						
RTA Initial Allowance	\$1,550	\$2,200	\$2,500	\$2,200	£1,450	¥200,000
RTA Top-up Allowance	\$775	\$1,100	\$1,250	\$1,100	£725	¥100,000
Permanent Residency Costs						
Allowance	\$10,000	\$10,000	\$10,000	\$10,000	£7,000	¥1,000,000

\*Use economy benchmark rates if premium economy seats not available

## **11.2. Appendix 1.2 - Additional Expense Reimbursement Requirements**

### **11.2.1. Additional Requirements - Australia**

Receipts for expenses >\$75AUD (pre-GST) must be 'tax invoices' which meets the below characteristics in order to be reimbursable:

- Words identifying that this is indeed a tax invoice (usually just these 2 words),
- The seller's identity,
- The seller's Australian business number ('ABN'),
- The date the invoice was issued,
- A brief description of the items sold, including the quantity and the price; and
- The GST amount (if any) payable (can be shown separately, or if the GST amount is exactly 1/11th of the total price, as a statement such as 'Total price includes GST')

For Fringe Benefit Tax (FBT), you must include details of meeting attendees and receipt split between clients and Rokt'stars in the detail section of Expensify, for all client and Roktstar's entertainment costs incurred. For example:

- You should put the following in the detailed description of the cost: 'Meeting with David Jones, 2 x Rokt attendees + 2 x DJs attendees'
- You should ensure you split the categories of this cost in Expensify between 'Client Entertainment' and 'Employee Entertainment'.

### **11.2.2. Additional Requirements - APAC**

APAC Rokt'stars (Australia, Singapore, Japan) will need to include the following information in the tax fields when preparing expense reports.

- For expenses incurred in foreign currency, select "GST free expenses / No tax".
- For expenses incurred in local currency,
  - if GST was charged, select "GST on expenses / Tax on purchases"

If GST was not charged , select "GST free expenses/ No tax".

### 11.3. Appendix 2.1 - Rokt Communication Guide

Using the right channel for communication helps everyone be more effective and efficient.

#### 11.3.1. When to use Email vs Chat vs Direct Message

**Email** is a more formal communication channel where it is expected that people read messages thoroughly and action requests. It is most effective when you are clear about the timeframe in which you need a response. Emails should be used for important announcements, requests, approvals, and items that require action.

**Group Chat Spaces** (Chat) are more informal and are best used for collaboration, social, and in-the-moment communication between colleagues. Chat is especially useful if you are looking to get feedback or to spark discussion around a topic for those who may be interested, or the audience of your message is less defined. Additionally, chat may be an appropriate venue where you want to make broader announcements to people outside of your team, but where the formality of email is not needed or desired.

Different people consume chat content differently, and this should factor into your choice of which channel to use. For some, chat is an always-on and immediate communication tool that they are regularly interacting with, while chat is consumed at a less frequent pace for others. This means that a message sent via chat might be read now, later, or not at all. If you need a higher degree of confidence that the message will be received and read in a timely manner, email may be a better choice.

**Direct Message** (DM) is used where you need an immediate response and may refer to either a 1:1 message on Google Chat or text message. This should be used sparingly, primarily when an immediate response is required or you need to make someone aware of something. For example, when a critical service has failed, a guest is waiting, there is an urgent, time-sensitive matter to discuss, or you want to prompt someone before you escalate.

Keep in mind that when you interrupt someone it typically takes the other person some time to refocus on what they were doing (see [here](#) and [here](#) for more information).

#### 11.3.2. Email Best Practices

- Be concise and specific when drafting emails. Show that you value the other person's time by making the message quick and easy to read and action.
- Be clear about what you want the recipient to do early in the email. For example, "Elizabeth, I need a response on the two points below", or "Stuart, this is FYI". It is also best if you include "Action required" or "Input needed" in the subject line to make it easier to triage the email without opening it.
- Avoid using group distribution lists that include members outside of your team. For example, if you look after the travel pod then you would send it to the travel pod but not to the whole organization or customer team.
- Avoid copying (CC'ing) in people that are tangentially related to the request in the hope of getting a quicker response or copying in other people to apply pressure to get someone to do something.

- Think carefully before copying someone into an email and remove people from the copy list if they are not relevant to the ongoing conversation (and use bcc to announce the change).
- Bcc should only be used to remove people from the message. e.g. "Thanks for the introduction John (moved to bcc), Hi Tim, ...."
- Take a moment to send a "Got it", "Leave it with me" or "I will get back to you in a week" reply to acknowledge a message and set an expectation around the response or action.
- Never send anything via email that you would not be comfortable showing up on the front page of the paper. Do not yell, be abusive or get emotional. Try to consider in advance how the recipient will receive the message and remember that there is a person, not a machine, on the receiving end of the message.

### **11.3.3. Chat Best Practices**

Threads are used in rooms to organize discussions around a topic. Comments are added by replying to an existing thread to continue the conversation, or by starting a new topic in the room using the 'Add New Thread' button. If you accidentally step on an existing conversation by replying instead of starting a new topic, you can delete the message and post it again as a new thread.

When you want certain people to have a higher likelihood of seeing a comment in a thread, you can tag them using the @ symbol. Note that tagging someone is not the same as sending them an email or DM. If you need to ensure the message is read, then sending a DM or email may be more appropriate. Please be mindful to limit your use of @all in chat rooms (aim to use it only in absolutely necessary circumstances) rather, be specific about who needs to see the message by tagging them (and email if it's important they see it soon).

Collaboration with external clients and partners can be done on Google Chat. Please follow Rokt's security protocol when collaborating with others through Google Chat (e.g. No transferring of PII data in whatever form).

Use the room that is most relevant for the content you want to post. Rooms are organized into categories based on the label at the start of the room name. If you need to create a new room then create it using the naming convention below, and if you want the room to be accessible to everyone at Rokt, add Rokt Team to the room:

- Client (e.g. Client - Ticketmaster): for internal discussions about that client.
- Product (e.g. Product - Rokt Upsells): for discussions about that product.
- Department (e.g. Marketing - Product Marketing): for discussion about and within that department.
- Procedure (e.g. Procedure - Campaign Policies and Placement Rules): for discussing approaches, policies, and procedures for certain aspects of Rokt.
- Group (e.g. Group - New York Office): for discussing things with a certain group of people
- Rokt (e.g. Rokt - Ticketmaster - EXTERNAL): for external collaboration with a client
- Temp (e.g. Temp - GKO 2023 Organizing): for more ad-hoc topics or issues with a shorter timespan

### 11.3.3.1. Recommended Chat Spaces

In addition, there are a number of special chat spaces that all Rokt'stars should join:

Google Chat Space	Description
Group - Everyone - General Chat	For communicating to everyone at Rokt
Group - Everyone - Company Announcements	Company Announcements: for Rokt-wide company announcements.
Ask Anything - Ideas, Discussion & Learning	Ideas, Discussion & Learning": for questions, answers, and comments from/with Senior Leaders
Thank You	For recognition of Rokt'stars
Rokt'star Team Changes	For announce new Rokt'stars, departing Rokt'stars and promotions/role changes

### 11.3.3.2. Rokt What's On Calendar

You may want to subscribe to the 'Rokt What's On' calendar to keep on top of what is happening at Rokt.

### 11.3.4. Escalating Unresponded Messages

A lack of a timely response can be frustrating and result in missed opportunities. If you are not getting the response you require:

- Give the person a prompt if you do not get a reply in 24 hours; either by talking to them if you are in the same office or via direct message if you are not.
- Escalate to the person's People Leader or another senior manager if you still do not get a reply in another 24 hours: Title the start of the subject line of the email "Escalating for Action", or make it clear in the DM that you are escalating an issue for action.
- Escalate again to the 2-up People Leader if you still do not get a response and continue to escalate accordingly on a 24-hour cadence.



## **11.4. Appendix 2.2 - Rokt Meeting Guide**

This guide is largely focused on internal meetings. Generally external meetings, particularly with Clients, are almost always a good thing. For external meetings we should aim to maintain a balance between the number of Rokt'stars and external guests attending.

### **11.4.1. Agenda and Attendees**

The larger the meeting, the less productive they tend to become. Larger meetings (more than 7 people) also have a negative impact on Rokt'star engagement as larger meetings make it harder for everyone to contribute. While these large meetings are sometimes necessary for alignment and information sharing, they should be kept short and to the point to reduce time used. As a guide, research suggests that 4 attendees are the optimum number to decide or solve a problem.

All meetings should include an agenda and desired outcomes in the invite, with any background/pre-read material distributed a minimum of 1-2 days prior. It is recommended that team meetings should rotate the meeting lead who will create, drive and own the agenda. This not only shares the workload, but also allows different voices and styles to be surfaced.

Attendees are encouraged to challenge the need for the meeting if the purpose and agenda is not clear, or to say "No" to some meeting invites if you feel you are not going to add any value or you could get an update afterwards. You should discuss with your People Leader and/or the organizer whether a meeting is mandatory for you and/or your team, preferably before declining the meeting. Research says that two-thirds of meetings are not productive.

### **11.4.2. Volume of Meetings**

Where possible, individual contributors should not be in internal meetings for more than 2 hours a day on average. The role of a People Leader inherently involves more meetings, but it is still important for them to try and maintain time each day *outside* of meetings. To aid this, it is recommended you block time in your diary for completing tasks that require focus and attention to complete.

There are only a few mandatory meetings at Rokt; a one-off induction, GKO, sometimes team meetings, 1:1s and All Hands.

Recurring group meetings are often the largest contributor to time lost in unproductive meetings. Recurring meetings should not be booked more than a month ahead to force a review of the meeting before it is set up again, and feedback should be sought to evaluate the effectiveness and necessity of the meeting. Note that it is normal to have recurring one-on-one meetings but they often do not need to be done on a weekly cadence.

In addition, instead of using the calendar defaults of 30 or 60 minutes, try a 10-minute stand-up meeting. Stand-up meetings where people do not sit down are a great way to keep meetings on point and productive. You can always arrange a follow up if you need more time. It is good practice to set your default meeting times to leave a 5- or 10-minute buffer to meeting lengths. In your calendar settings, you can enable "Speedy Meetings" to automatically set a buffer at the end of meetings.

## **11.5. Appendix 2.3 - Content Creation Guide**

Content creation is used by many teams for many purposes at Rokt, but there are common themes - communication, alignment, collaboration, and education. As content proliferates, discovery, fragmentation, conflict, and access issues are common challenges we face.

To help solve some of these challenges and make it easier to share content, we have developed a recommended process for producing content, including the tools used for each step:

### **11.5.1. Content Creation and Review**

We have found content creation tends to be a focused and collaborative process amongst a small group of Rokt'stars. Similarly, it is important to keep the group of tools small for consistency, productivity, and ease. When you use tools other people are comfortable with, you make collaboration and communication a lot easier.

Under the G Suite, we use Google Docs, Sheets and Slides for content creation, which all integrate natively with Google Drive. You can use other tools individually, but when collaborating, you should use tools within G Suite.

Ownership of documents is another important step in keeping track of content, which often has to live for extended periods of time. This owner is responsible for resolving comments and adding updates where appropriate. You can identify the owner of a document from the initials at the end of the document name (see [Document Naming Convention](#)).

When the document owner is comfortable and the content is ready for broader review, they should post the content to appropriate Chat Space for discussion and input or email it if it requires approval. Generally, the document owner is looking for this to be accepted and merged into the broader knowledge base and existing processes.

### **11.5.2. Publishing and Repurposing**

When a document is 'published,' it signals to everyone that the content is ready for adoption, broader use and can be referenced for building out other content. To signal this, the document name should be adjusted from 'DRAFT' to 'FINAL', and a version number added in the document.

General share access should also be changed to view or comment only to prevent further editing. In addition, the document should be moved (if not already) to an appropriate shared drive on Google Drive.

For internal content that is accessed by more than one function (e.g. policies like this handbook) the application that is used across the company is Google Docs.

Sometimes, another team may want to repurpose content for other purposes. For example, marketing produces short videos for customers, and the People Team wants to utilize them within internal training courses. In this case, it is important that only published 'FINAL' content is used.

**11.5.3. Retirement**

When appropriate, the functional owner should retire content that is no longer relevant. The content should be deleted or archived and renamed 'ARCHIVED' for Google Docs, and removed for publishing tools.

**11.5.4. Document Naming Conventions**

Please use the following naming convention when creating documents to be shared with colleagues or saved on Google Drive:

[YYYYMMDD]-[DOCUMENT TITLE]-[YOUR INITIALS]-[DRAFT/FINAL/ARCHIVED]

This makes it easier to find files, identify recent vs older versions of documents, as well as document ownership. Make sure to always save documents into an appropriate folder on a Rokt Shared Drive and not your personal Drive.

**11.5.5. Document Sharing with Clients**

If you need to share static documents with clients (e.g., presentations, reports, etc.) use HubSpot Documents in PDF form where possible.

If you need to collaborate with a client on a document or you have more dynamic content (e.g., a spreadsheet with campaign performance) you can share individual files within the "Rokt Business" team drive externally.

## **11.6. Appendix 3 - Wellness and Safety in the Workplace Policies**

### **11.6.1. Anti-discrimination and Equal Employment Opportunity Policy**

Rokt wants to ensure we create an environment in which everyone is provided the best opportunity to succeed, and as such, we make employment decisions based on merit and support a discrimination-free workplace. It is important to us that Rokt's stars, clients and any other people who you may know as part of your employment with Rokt feel welcome, supported, and not discriminated against.

**At Rokt, we believe that we get the best results when everyone - regardless of who you are - has the same chance to shine. Diversity also helps us approach problems with different perspectives and ultimately come up with better solutions. Rokt is a truly diverse global organization employing people of myriad nationalities from multiple cultures, across the globe.**

In support of this belief, Rokt makes employment decisions based on merit to support a discrimination-free workplace, and enforces non-discrimination in any work-related context including conferences, work functions, office parties and business trips. We also adhere to all anti-discrimination legislation in each market in which we operate. In an effort to support you in understanding this policy and our commitment to it, we host training annually on behaviors of inclusion and unconscious bias and on preventing discrimination and harassment in the workplace.

This policy applies to any form of discrimination that occurs not only between each other but also between clients or any other people who you may get to know as part of your employment with Rokt.

We take a firm stance on discrimination and breach of this policy is considered to be serious and may result in legal and disciplinary action, including termination, against the offending individual. This policy applies to all team members, contractors, volunteers, and any other persons you may come into contact with during your employment with Rokt.

#### **11.6.1.1. What is Discrimination?**

Discrimination occurs when a person or group of people are treated less favorably due to their:

- race, including color, descent, ethnicity, or national origin,
- gender,
- age,
- religious belief or activity,
- disability, including physical, mental, or intellectual,
- medical condition,
- sexual orientation,
- gender identity,
- relationship status,
- political belief or activity,
- industry or trade union membership or non-membership,
- criminal record,

- service in the Armed Forces, or
- caregiver's and/or family responsibilities including pregnancy.

It is unlawful to discriminate against a person or group of people based on any of the above traits or attributes or any other characteristic protected by applicable law.

#### **11.6.1.2. Equal Opportunity Employer**

Being an equal employment opportunity employer means endeavoring to ensure that everyone has equal access to available employment activities (such as recruitment, promotions, training and development), free from discrimination and harassment and providing programs to assist people to overcome disadvantage, if required.

#### **11.6.1.3. Retaliation or Victimization**

Retaliation is when a person is retaliated against or subjected to discrimination because they have lodged, intend to lodge, or are otherwise involved in a discrimination complaint. You must not participate in retaliation against a person who raises a complaint or subject them to any physical or psychological harm.

People Leaders have additional responsibilities and obligations imposed on them to take immediate action if and when violations are reported to them. Please refer to the [Grievance Policy](#) for more detail on the requirements and process to follow if a violation is reported or observed.

#### **11.6.1.4. Breaches and Reporting**

At Rokt, everyone has a responsibility as part of their employment to adhere to this policy. If you feel you are (or observe someone else) being discriminated against, we strongly recommend that you should immediately report your concern to your People Leader or People Team partner.

Please refer to the [Grievance Policy](#) for further information on how a claim of discrimination will be handled at Rokt.

#### **11.6.2. Harassment**

Everyone has a right to feel safe and supported, and that you have avenues to raise concerns if you feel you are being harassed. This policy defines the behaviors that are considered unacceptable when it comes to workplace harassment - including sexual harassment - and what to do if you have any concerns.

At Rokt, we believe that we get the best out of our people and teams when they can work in an environment that is free from harassment. As such, Rokt team members are expected to be inclusive, collaborative, and supportive. It is important that you consider the implications of your behaviors and support your colleagues to speak up and raise concerns.

Bullying and harassment of all types are unlawful under discrimination and work health and safety legislation in any work-related context including conferences, work functions, office parties and business trips.

This policy applies to any form of bullying and harassment, including sexual harassment that occurs not only between Rokt'stars but also between any other people that you may come into

contact with as part of your employment with Rokt. Sexual harassment as well as harassment due to a person's race, age, national origin, religion, disability, sexual orientation, or any other protected characteristic under the law or Rokt's equal employment opportunity policy is strictly prohibited.

We take a firm stance on bullying and all forms of harassment and breach of this policy is considered to be serious and may result in disciplinary and/or legal action against the offending person. This policy applies to all Rokt'stars, workers and contractors.

#### **11.6.2.1. Sexual Harassment**

Sexual harassment is any unwelcomed sexual advance or other conduct of a sexual nature which makes a person feel offended, humiliated, or intimidated where a reasonable person would anticipate that reaction in the circumstances. Examples of sexual harassment may include, but are not limited to:

- Unwelcome physical contact such as pinching, touching, grabbing, kissing, or hugging,
- Sexual jokes or comments, sexually explicit emails, texts and/or conversations,
- Intrusive questions or insinuations about a person's private life; or
- Requests for sexual favors.

Even if you did not intend to offend, humiliate, or intimidate the other person, certain conduct can amount to sexual harassment. Sexual harassment is not interaction, flirtation or friendships, which are mutual or consensual.

#### **11.6.2.2. Bullying**

Bullying is repeated, unreasonable behavior directed towards a worker or group of workers that creates a risk to health and safety. Bullying does not have to be directed at a particular individual to be unlawful. Behavior which creates a hostile working environment can also be unlawful.

Examples of bullying include, but are not limited to:

- Physical or verbal abuse,
- Yelling, screaming, offensive behavior or language; and/or
- Intimidation.

Legitimate and reasonable management actions - such as actions taken to transfer, demote, discipline, retrench or dismiss an individual - are not considered to be bullying, providing these actions are conducted in a reasonable way. Further, it is not bullying for your People Leader to counsel you regarding your performance or conduct in a reasonable way as this may be necessary to ensure you are meeting our expectations.

#### **11.6.2.3. Retaliation and Victimization**

Retaliation is where a person is retaliated against or subjected to bullying because they have lodged a complaint or intend to lodge a complaint alleging, among other things, harassment, bullying, discrimination, or other unlawful activities or are involved in investigating a complaint or a proceeding of such activities (e.g. appearing as a witness). You must not retaliate against a person who raises a complaint of bullying or harassment or subject them to any physical or

psychological harm. We aim to support you and encourage you to display this same behavior by ensuring that any person who is involved in a grievance or complaint is treated with respect and confidentiality.

#### **11.6.2.4. Breaches and Reporting**

At Rokt, everyone has a responsibility as part of their employment to adhere to this policy. If you feel you are (or observe someone else) being bullied, harassed, sexually harassed or retaliated against in violation of this policy, you should immediately report your concern to your People Leader or People Team Partner.

Please refer to the [Grievance Policy](#) for further information on how a claim of bullying and/or sexual harassment will be handled at Rokt.

#### **11.6.3. Grievance Policy**

At Rokt our aim is to create a work environment where you feel safe, happy, and supported to do your best work. Occasionally there may be times when there are disputes in the workplace and support may be required to resolve some of these situations.

This policy outlines the process that Rokt will follow in the event of a grievance and as such, applies to all Rokt'stars, volunteers and contractors.

##### **11.6.3.1. What Is a Grievance?**

A grievance is any type of problem, concern, or complaint you may have about work or the work environment. A grievance can relate to almost any aspect of employment and can be about any act, behavior, omission, situation or decision impacting on you, that you think is unfair, unjustified or in violation of any Rokt policy, such as the Anti-discrimination and EEO Policy or the Bullying and Harassment Policy.

##### **11.6.3.2. Grievance Process**

Please note, this Grievance Policy can be amended by Rokt as it sees fit and does not vest enforceable rights in Rokt'stars, contractors or workers.

#### **Option 1: Attempt to resolve the grievance yourself**

If you feel comfortable in doing so, attempt to address the issue directly with the person involved. It is important that you address concerns in a professional and non-confrontational manner and clearly explain what the behavior of concern is and how it is affecting you and/or your work. Always ensure you remove any emotion from the discussion and simply focus on the facts that require addressing. Be aware that the person you are having an issue with may have no prior knowledge of your concerns or how their behavior is being perceived.

#### **Option 2: Report the grievance to your People Leader or Rokt's Whistleblower Service**

If you do not feel comfortable talking to the person(s) involved, or have tried and the issue was not resolved, you should report the matter to your People Leader, 2-Up People Leader, ExCo member or People Team partner.

If you do not feel comfortable reporting the matter directly or you wish to remain anonymous, you may report the matter to Rokt's externally managed Whistleblower service, EthicsPoint. Rokt'stars can report matters to EthicsPoint via a [website](#), mobile site or telephone service. Contact details for EthicsPoint can be found in Guru under the "EthicsPoint Whistleblower Service Details" card.

Submissions to Ethics Point will be routed to the General Counsel, Chief People Officer and Chief Operating Officer. If a submission explains that any of those three individuals are involved in the complaint, the third-party provider will not notify them of the case. If each of these individuals is involved, the matter will be raised directly with Rokt's Audit Committee Chairperson.

After reporting a grievance, your People Leader, Chief People Officer, Chief Operating Officer, General Counsel or a representative from EthicsPoint (as appropriate) may use reasonable endeavors to conduct an initial meeting, or engage, with you to:

- Obtain information about your grievance and what you believe will resolve it,
- Explain how the grievance procedure works, including protection from retaliation; and
- Decide if they are the appropriate person to handle the grievance. If your People Leader decides they are not the appropriate person to manage the complaint they will refer the complaint to the People Team.

If you elect to report a matter via EthicsPoint, it is possible for you to communicate and provide additional information in an anonymous manner.

To resolve the grievance, there could be three separate steps undertaken in the process: the informal, formal and appeal processes.

### **Informal Process**

Many grievances can be resolved through our informal process. Usually the People Leader will facilitate a discussion between those involved in the grievance. In circumstances where the People Leader considers this process to be inappropriate or where it is not achieving the desired outcome, the grievance may be escalated to the formal process.

### **Formal Process**

The formal process involves an investigation of the grievance and a decision about appropriate actions and outcomes. Depending on the circumstances and the nature in which the complaint was raised, the formal process may be conducted internally by Rokt or by an external party including EthicsPoint or a law firm. A record of all conversations, interviews and supporting documentation collected throughout the grievance process will be kept on file.

This process may include some or all the following steps depending on the type and severity of the complaint:

1. A formal written complaint is submitted to the People Leader. The complaint should include dates, the people involved, the facts of the event, how it has been dealt with to date and the desired outcome for it to be resolved effectively.



2. The relevant person on the People Team will review the complaint and decide if an investigation needs to take place prior to a formal meeting.
3. An investigation will be conducted in circumstances where more information is required, where there are conflicting accounts of events or to establish if the complaint has merit. The investigation may include individual interviews with those involved and/or the collection of supporting documentation or evidence. Efforts will be taken to carry out the investigation in a confidential manner.
4. Once an investigation has been conducted, a formal meeting will be held to allow the person(s) whom the complaint is about to offer their response on the concerns raised throughout the investigation or complaint documentation.
5. Following the investigation, a resulting course of action may be provided for those involved based on all the information collected. Potential actions may include, but are not limited to performance management, a formal warning, training or mentoring; and/or termination of employment.

Once a course of action has been put in place, Rokt will follow up with those involved to ensure the grievance has been effectively resolved. Please note that should an investigation into a complaint show that the complaint was knowingly false, this will be followed up with the complaint and dealt with under the [Performance Management](#) policy, and there may be resulting disciplinary actions taken that could include termination of employment.

### **Appeal Process**

If you are dissatisfied with the outcome of the formal investigation, you may appeal the decision to the CEO or their delegate. The decision of the party conducting this appeal will be final with no further internal steps available.

### **During the Process**

During all stages of the grievance process, everyone involved will be treated fairly. We will ensure that all individuals are:

- Informed of any allegations against them,
- Given an opportunity to respond,
- Allowed a support person,
- Treated in a professional and non-judgmental way; and
- Given adequate notice of meetings.

#### **11.6.3.3. Vexatious or False Claims**

Should an investigation into a complaint show that the complaint was knowingly false or brought for the purpose of harassing another employee, it will be followed up with the complainant and dealt with under the [Performance Management](#) policy and there may be resulting disciplinary actions taken.

#### **11.6.3.4. Documentation**

Where considered appropriate, agreed resolutions of grievances arising from the informal procedure may be recorded and signed by all parties. Generally, it will not be necessary to put records of a grievance in a Rokt'star's file, unless there is some disciplinary action taken as a

result of the grievance. A record of any disciplinary action that is taken arising from a formal investigation will be placed on an employee's file.

#### **11.6.3.5. Professional Conduct**

Work will continue as normal while a grievance is being dealt with unless the situation is deemed serious enough for this to be inadvisable. In these situations, work modifications may be implemented during the course of the investigation to ensure those involved are able to work in an environment that they feel safe and comfortable in. Anyone affected by the grievance is expected to cooperate with us to ensure an efficient and fair resolution.

During a grievance process, we expect all Rokt'stars to be honest, professional, respectful, and to keep the grievance-related details confidential. Disciplinary action, including possible termination, may be taken against any person who breaches confidentiality, fails to cooperate, or victimizes the person who lodged the grievance.

#### **11.6.3.6. At-will Employment**

If the nature of your employment contract with Rokt is at-will and is explicitly stated so in your employment contract, nothing in this policy alters the policy of employment at-will. Therefore, if your individual written contract of employment details at-will employment, the employment relationship remains terminable at-will by either Rokt or the Rokt'star, with or without cause or prior notice.

#### **11.6.3.7. Access to Support and Representation**

If you are involved in a grievance in any capacity, you can seek advice from another representative at any stage during the grievance process. You are entitled to bring a support person to any formal meeting if you wish and Rokt will provide you with a reasonable amount of time for you to arrange for this person to attend. This support person, however, is not entitled to speak on your behalf during the meeting and it is requested that you provide 24 hours' notice of your intent to bring a support person to the meeting, as well as their name.

#### **11.6.3.8. Breaches and Reporting**

At Rokt, everyone has a responsibility as part of their employment to adhere to this policy. If you feel the policy has been breached, you should immediately report your concern to your People Leader or People Team partner.

Please refer to the [Performance Management](#) policy for further information on how a breach of this policy will be handled at Rokt.

#### **11.6.4. Workplace Safety Policy**

At Rokt we take workplace health and safety seriously and endeavor to provide a safe working environment. While it is normal to want to have some fun at work, we take a firm stance on workplace health and safety.

This policy outlines the responsibilities of all Rokt'stars in creating and maintaining a safe working environment. Breach of this policy is considered to be serious and may result in legal and/or disciplinary action.

#### **11.6.4.1. Hazards and Risks**

A hazard is anything in the workplace that has the potential to harm someone. Some examples may include poorly placed cords and wires, incorrect manual handling procedures, slippery floors, cleaning products, unsafe workplace behaviors and fatigue.

A risk is when it is possible that a hazard will cause harm. The level of risk will depend on factors such as how often the job is done, the number of people involved and how serious any injuries that result could be.

#### **11.6.4.2. Identifying Hazards and Risks**

Rokt maintains its commitment to a safe working environment by:

- Routinely conducting assessments of the workplace to detect, assess and respond to identified hazards or risks,
- Prioritizing the removal of any hazards or risks to prevent injury, illness, or incidents from occurring; and
- Reducing the likelihood of the risk or hazard occurring and its severity, where we are unable to eliminate the risk entirely.

#### **11.6.4.3. Workplace Health and Safety Responsibilities**

You play a key role in creating and maintaining a safe working environment. As such, you have an obligation and a responsibility to:

- Conduct yourself in a manner that is appropriate, always exhibiting safe and healthy work practices,
- Be responsible for your own health and safety, ensuring you do not conduct yourself in a manner that might compromise the health and safety of others,
- Disclose to the People Team if you suffer from a medical condition that may impact your ability to perform in your role with or without reasonable accommodation,
- Undertake fitness for work assessments if inherent requirements of the job are unable to be performed,
- Follow all safe work method statements, safe travel practices, procedures, instructions, and rules,
- Comply with legislation and laws relating to workplace health and safety and follow all safe work practices, procedures, instructions, and rules,
- Encourage others to work in a safe and healthy manner; and
- Uphold and familiarize yourself with the duties that apply to you.

If you are a People Leader, you have additional responsibilities to ensure a safe working environment:

- Treating all breaches of workplace health and safety standards seriously and taking appropriate action; and
- Providing adequate information, instruction, training, and supervision to enable your Rokt'stars to perform their roles effectively and safely.

#### **11.6.4.4. Workplace injury and Compensation**

All Rokt'stars are covered by workers' compensation insurance, which compensates a Rokt'star for lost time, medical expenses and loss of life or dismemberment from an injury arising out of or in the course of work. Rokt'stars must immediately report any accident or injury to their People Leader and the Rokt People Team so that the necessary paperwork may be completed.

All claims for compensation in respect of injury, disease or death sustained whilst at work or whilst traveling to or from work shall be dealt with in accordance with the Workers' Compensation legislation in force at the relevant time.

Rokt'stars who return to work after a medical-related absence may be required to submit a physician's statement detailing their fitness for their return to work. Rokt reserves the right to have Rokt'stars submit to a medical examination by a physician designated by Rokt at no expense to the Rokt'star.

#### **11.6.4.5. Breaches and Reporting**

At Rokt, everyone has a responsibility as part of their employment to adhere to this policy. If you observe a hazard or a risk in the workplace or are involved in a safety incident, you should report your concerns to your People Leader or the People Team partner.

Please refer to the [Performance Management](#) policy for further information on how a breach of this policy will be handled at Rokt.

#### **11.6.5. Anti-bribery and Anti-corruption Policy**

At Rokt, we are committed to conducting business in compliance with the law including all anti-bribery and anti-corruption laws.

Rokt expects every Rokt'star to adhere to high ethical standards, promote ethical behavior and be honest and forthright in dealings with one another as well as with customers, business partners and the public. Rokt'stars must not engage in conduct or activity that may raise questions as to the Rokt's honesty, impartiality, or reputation. Every action should be judged by considering whether it is legal, fair to all concerned, in the best interests of our stakeholders, Rokt'stars and customers and able to withstand public scrutiny.

Rokt is committed to conduct business in compliance with the law, including all applicable anti-bribery and anti-corruption laws in all countries in which we operate. Acting outside of the law places the long-term success of the business in jeopardy and exposes both Rokt and its Rokt'stars to fines and other penalties including imprisonment. As part of their own supply chain assurance, our Partners and Advertisers also demand that we abide by the law, and not undertake bribery or engage in corruption. Thus, Rokt'stars are required to comply with all Anti-Corruption Legislation.

This Policy does not prohibit interactions with Government Officials, but it does forbid corrupt interactions with such individuals.

Bribery and the related improper conduct addressed by this Policy are serious offenses. If Rokt or one of its subsidiaries is found to have taken part in bribery, or any other related improper conduct

addressed by this Policy, it could face a fine and suffer reputational harm. An individual may be subject to penalties or lengthy terms of imprisonment. Breach of this Policy by Rokt'stars will be regarded as serious misconduct, leading to disciplinary action, which may include termination of employment.

#### **11.6.5.1. Definitions**

In this policy, the following words or phrases mean the following:

**Anti-Corruption Legislation** means the Singapore Prevention of Corruption Act 1993, United States Foreign Corrupt Practices Act (the "FCPA"), the Criminal Code Act 1995, (Commonwealth of Australia) and the Bribery Act 2010, (United Kingdom).

**Bribery** means the offering or providing (or authorizing the offer or provision) of any loan, gift, lavish trip or entertainment, donation, payment, or any other thing of value directly or indirectly, in cash or in kind, to or for the benefit of any Official or Third Party to obtain or retain business or to secure any improper advantage for Rokt.

**Business Associates** means third party companies and individuals (such as joint venture partners, consultants, and agents) acting on Rokt's behalf, whether directly or indirectly, by representing Rokt's interests to foreign governments in relation to international business development or retention of business opportunities.

**Facilitation Payment** means payments of nominal amounts to persons to ensure or speed up the performance of a Government Official's routine governmental duties or actions.

**Government Official** means anyone regardless of rank or title who is:

- engaged in public duty in a government agency whether elected or appointed, and at any level of government including national, state, or local government entities,
- a member of any legislative, administrative, or judicial body,
- a Rokt'star of a government agency, regardless of rank including an administrative and/or office worker,
- an officer or Rokt'star of a government- owned or government- controlled entity, including state- owned entities that operate in the commercial sector,
- an officer or Rokt'star of a public international organization (such as the United Nations, the World Bank, or the International Monetary Fund); or
- acting in an official capacity for a government, government agency, or state- owned enterprise.

**Item of Value** or **anything of value** includes cash, travel, meals, gifts, and other tangible or intangible benefits.

**Official** means a Government Official, political party, official or officer of a political party or candidate for political office.

**Rokt'star** means all persons acting on behalf of Rokt at all levels, including officers, directors, employees of Rokt.

**Secure an improper advantage** includes obtaining any commercial or financial benefit.

**Third Party** means any individual or organization other than Officials, with whom Rokt Rokt'stars come into contact during the course of their employment or business relationships associated with Rokt.

#### **11.6.5.2. Prohibition against Bribery and Corruption**

Rokt strictly prohibits Rokt'stars engaging in or tolerating Bribery or any other form of corruption.

Rokt's corporate values require that in all aspects of business all Rokt'stars act honestly, adhere to the highest ethical standards, and act in compliance with all relevant legal requirements. In this respect Rokt'stars must not engage in Bribery, or any other form of Corruption.

The prohibition of Bribery under this Policy includes the provision or conveying of anything of value to any Third Party, Official or family members of Officials, whether directly or indirectly, to secure any improper advantage or to obtain or retain business. This means that Rokt'stars must not:

- Offer, promise or give an Item of Value with the intention of influencing an Official or Third Party who is otherwise expected to act in good faith or in an impartial manner, to do or omit to do anything in the performance of their role or function, To provide Rokt with business or an improper advantage; or
- Authorize the payment or provision of Items of Value to any other person, if it is known, or reasonably should have been known, that any portion of that payment or Item of Value will be passed onto an Official or Third Party to secure an improper advantage or obtain or retain business; or
- Engage, or procure, a third party to make a payment or provide an Item of Value to an Official or Third Party, (or to procure another person to make such payment or provision), To secure an improper advantage or obtain or retain business.
- The prohibition of Bribery under this Policy also includes the request or acceptance of (or the agreement to accept) anything of value from an Official or Third Party either:
  - intending that, in consequence, a function or activity should be performed improperly (whether by the requestor/acceptor or another person); or
  - where the request, agreement, or acceptance itself constitutes the recipient's improper performance of a function or activity; or
  - as a reward for the improper performance of a function or activity (whether by the recipient or another person).

All interactions with Officials and Third Parties must comply with this Policy, and Rokt and Rokt'stars must not take any actions, whether direct or indirect, which create the appearance of impropriety, regardless of whether there is any improper intent behind their actions.

Rokt will separately provide Rokt'stars with detailed guidelines on gifts and entertainment.

If you are in any doubt as to the appropriateness of any gift or entertainment, you should consult the General Counsel before it is given or accepted or otherwise as soon as possible.

The prohibitions under this Policy include a prohibition on Rokt'stars using personal funds to undertake any interaction or transaction that is prohibited under this Policy

**11.6.5.3. Policy Compliance, Training and Review**

Rokt's General Counsel and is responsible for the overall administration of this Policy. Rokt's General Counsel will monitor the implementation of this Policy and will review on an ongoing basis the Policy's suitability and effectiveness. Internal control systems and procedures will be audited regularly to ensure that we are effective in minimizing the risk of non-compliance with this Policy.

All Rokt'stars are required to understand and comply with this Policy and to follow the reporting requirements set out in this Policy. To this end, regular and appropriate training on how to comply with this Policy will be provided to all senior managers and other relevant Rokt'stars by the General Counsel for each business.

The prevention, detection and reporting of bribery and other improper conduct addressed by this Policy are the responsibility of all those working for or engaged by Rokt. All Rokt'stars should be vigilant and immediately report any breaches or suspicious activity to the officer responsible for compliance.

**11.6.5.4. Documentation and Record Keeping**

As part of Rokt's commitment to open and honest business practice, Rokt requires all its businesses to maintain accurate books of accounts and records.

All Rokt subsidiaries must keep accurate and complete records of all business transactions:

- in accordance with generally accepted accounting principles and practices,
- in accordance with Rokt's accounting and finance policies, and
- in a manner that reasonably reflects the underlying transactions and events.

It is the responsibility of all Rokt'stars to ensure that all business transactions are recorded honestly and accurately and that any errors or falsification of documents are promptly reported to the appropriate member of the senior management team of the relevant subsidiary, and corrected.

**11.6.5.5. Types of Payments, Contributions and Donations****Prohibition of Facilitation Payments**

Rokt does not condone the making of Facilitation Payments and the making of these by Rokt'stars are prohibited.

**Political Contributions**

Rokt prohibits Rokt'stars from making political contributions to candidates for any foreign political office on behalf of Rokt. This Policy does not allow Rokt to curtail an individual's freedom to make political contributions in their personal capacity.

The context of any other political contributions is key in determining their appropriateness. For instance, it is permissible for Rokt to make a payment to attend a political function in circumstances where such payment could not be construed as an attempt to influence the political party.



If you are in any doubt as to the appropriateness of any political contribution, you should consult Rokt's General Counsel before it is given or accepted or otherwise as soon as possible.

### **Charitable Donations**

Rokt is committed to the communities in which it does business. To this end, Rokt supports selected charitable organizations as determined by the local business. To ensure that donations made by Rokt are for proper charitable purposes, Rokt'stars must only make donations on behalf of Rokt to charitable organizations previously approved by Rokt.

#### **11.6.5.6. Compliance with Local Laws Required**

If local laws, codes of conduct, or other regulations in a particular country or region are more restrictive than this Policy, then any Rokt'star, including any Business Associates operating in that country or region must fully comply with the more restrictive requirements.

To the extent that laws and regulations in any country are more rigorous or restrictive than this Policy, those laws and regulations should be followed by any subsidiary operating in that country. Rokt may, from time to time, provide country- specific directions for particular markets.

#### **11.6.5.7. Reporting Violations and Suspected Misconduct**

Any Rokt'star or stakeholder who believes that a violation of this Policy or any laws has been committed, is being committed, or is being planned, should report the matter immediately to the Chief People Officer.

If anyone is unsure whether a particular act constitutes bribery, or a facilitation payment, or has any other queries, you should ask the Chief People Officer.

#### **11.6.5.8. Protection for Whistleblowing**

Whistleblowers are those who sound the alert on danger, malpractice, bribery, or corruption or other illegal conduct. Rokt prohibits retaliation against anyone reporting such suspicions will support the rights of Rokt'stars who:

- Report in good faith any perceived wrongdoing, impropriety, serious unethical behavior, legal or regulatory non-compliance or questionable accounting or audit matter; or
- Expect and receive protection from any reprisal or detrimental action resulting from such disclosure.

#### **11.6.5.9. Reporting**

Rokt'stars and stakeholders are encouraged to disclose to their People Leader or People Team partner, preferably in person (but alternatively by telephone or email) any behavior, practice, or activity that they reasonably believe or perceive to:

- Be unethical or improper,
- Constitute financial malpractice, impropriety, corruption, bribery or fraud,
- Be potentially damaging to Rokt, a Rokt'star and/or Rokt's reputation,
- Be in breach or potentially in breach of any law or regulation,
- Amount to an abuse of authority,



- Amount to non-disclosure or manipulation of the internal or external audit process,
- Be a breach of the Rokt's policies; or
- Involve harassment, discrimination, victimization, or bullying.

All disclosures made under this Policy will be documented and investigated promptly, initially by an internal investigator.

In making a disclosure under this Policy, Rokt'stars and stakeholders must act in good faith on a genuine belief that there has been wrongdoing, and not for any malicious purpose. Where it is determined that a disclosure is made by a Rokt'star falsely or for a malicious purpose, the Rokt reserves the right to take disciplinary action against the disclosing Rokt'star.

#### **11.6.5.10. Protection for Good Faith Disclosures**

Rokt'stars who wish to raise a concern or report another's wrongdoing, or who have refused pressure to either accept or offer a bribe, should not be worried about the possible repercussions. Rokt encourages openness and will support anyone who raises genuine concerns in good faith under this Policy.

Rokt will not tolerate any reprisals against Rokt'stars or stakeholders who have made a disclosure of any matter under this Policy where the disclosure has acted in good faith and on a genuine belief or perception of wrongdoing, and on reasonable grounds. Rokt will act in the best interests of a disclosure to protect them from any victimization, adverse reaction, or intimidation, and commits to ensure confidentiality (to the extent permitted by law) and fairness in all matters raised under this Policy.

#### **11.6.6. Anti-slavery and Human Trafficking Policy**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. Rokt is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

#### **11.6.7. Compliance with Laws**

Rokt and its Rokt'stars must obey all applicable laws and regulations that affect Rokt's business. Although Rokt does not expect its Rokt'stars to be experts in legal matters, we hold each Rokt'star responsible for being familiar with the laws governing your areas of responsibility. If you have a question concerning the application of any law or regulation to a contemplated action, it is your responsibility to seek guidance.

#### **11.6.8. Conflict of Interest**

Each Rokt'star has a duty to carry out his or her responsibilities with the utmost good faith and loyalty to Rokt. A "personal conflict of interest" occurs when your own interests (for example, personal relationship, financial gain, career development, or reputation advantage), or those of

your immediate family, interfere in any way or even appear to interfere with Rokt's legitimate business interests or your ability to make objective and fair decisions when performing your job.

You must endeavor to avoid situations in which your personal interests could conflict, or may be perceived to conflict, with those of Rokt. If you are in doubt whether a situation or certain activity constitutes a conflict of interest, it is your responsibility to seek guidance.

If you have or think you may have a personal, business or financial relationship that conflicts, or may conflict, with the interests of the business, you must immediately report it to the Chief People Officer.

The Chief People Officer will notify relevant ExCo members as applicable in the event there is a potential conflict of interest. From there, decisions will be made on restricting/limiting systems and data access and changes to reporting lines. Any changes that are the result of conflicts of interest will be disclosed to the individual as they are made.

#### **11.6.9. Code of Conduct and Business Ethics**

Rokt aspires to conduct its business in accordance with uncompromising ethical standards and in full compliance with all laws and regulations. In the course of conducting Rokt business and undertaking duties of your role, integrity must underlie all Rokt relationships.