

POLICY

Code of conduct

Trackita Pty Ltd: Code of Conduct (Contractors & Employees)

This Code of Conduct sets forth our expectations for ethical and professional behavior at Trackita Pty Ltd. It applies to all employees, contractors, and consultants engaged by the company, particularly those providing services to government agencies or departments. Adherence to these standards is critical for maintaining our reputation, fulfilling our contractual obligations, and upholding trust with our clients.

1. Purpose

- **Clarity and Integrity:** Establish clear guidelines for acceptable conduct, ensuring that individuals represent Trackita responsibly.
 - **Legal and Ethical Compliance:** Reinforce compliance with applicable Australian laws, including those specific to government contracts and public-sector engagements.
 - **Professional Excellence:** Promote a respectful, safe, and high-performing work culture.
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2. Scope

- **Who is Covered:** All employees, contractors, subcontractors, and consultants working under Trackita's banner.
 - **Where it Applies:** Any setting where you are acting on behalf of Trackita—on company premises, at client sites (including government facilities), or during work-related events and travel.
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3. Key Principles

1. **Honesty and Integrity:** Always be truthful, transparent, and fair in your dealings with clients, colleagues, and other stakeholders.
 2. **Respect and Inclusivity:** Treat everyone with dignity, free from discrimination, bullying, or harassment.
 3. **Accountability:** Take responsibility for your actions, decisions, and their impact on the organization and its clients.
 4. **Confidentiality:** Protect sensitive information, especially regarding government contracts and proprietary data.
 5. **Compliance with Laws and Policies:** Uphold all relevant legal requirements and Trackita's internal directives.
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4. Professional Conduct

4.1 Compliance with Legal and Internal Guidelines

- **Laws and Regulations:** Comply with all applicable Australian regulations, including those governing workplace safety, data protection, and government contracting.
- **Company Policies:** Follow all Trackita policies, including but not limited to Anti-Bullying & Anti-Discrimination, Health & Safety, and this Code of Conduct.

4.2 Representation of Trackita

- **Acting as a Company Representative:** Present yourself in a professional manner that upholds Trackita's reputation, especially in government-facing roles.
- **Public Statements:** Do not make public statements on behalf of Trackita without formal authorization. This includes statements on social media or in any public forum.

4.3 Work Performance

- **Effort and Competence:** Dedicate your skills, expertise, and attention to fulfilling contractual obligations. Meet deadlines and quality standards consistently.
 - **Safe Work Practices:** Follow all health and safety guidelines to ensure a secure environment for yourself and others.
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5. Conflict of Interest

- **Definition:** A conflict of interest arises when personal interests clash with professional responsibilities, particularly if it could compromise impartiality.

- **Duty to Disclose:** Disclose any actual or potential conflicts of interest immediately to management (e.g., personal relationships with client personnel, ownership in competing businesses).
 - **Prohibited Activities:** Avoid any outside work or directorships that could compete with Trackita's interests or risk confidentiality breaches.
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6. Confidentiality and Data Protection

- **Sensitive Information:** Treat all client data (especially government-related data) as confidential. Only share information with authorized parties on a need-to-know basis.
 - **Use of Company and Client Resources:** Do not use systems, devices, or networks in a way that compromises data security or violates confidentiality agreements.
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7. Anti-Corruption and Bribery

- **Gifts and Benefits:** Do not accept any gifts, perks, or hospitality that could influence (or appear to influence) your professional judgment. If in doubt, seek management approval.
 - **Fair Dealings:** Maintain transparent, honest interactions with suppliers, subcontractors, and government officials. Bribery or any form of corrupt practice is strictly prohibited.
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8. Behavior Toward Others

- **Equal Opportunity:** Ensure a workplace free from discrimination based on age, sex, ethnicity, religion, disability, or any other protected characteristic.
 - **No Harassment or Bullying:** Refrain from any behavior—verbal, physical, or online—that could be perceived as intimidating, humiliating, or hostile.
 - **Professional Communication:** Keep all forms of communication (emails, chats, in-person) polite, clear, and constructive.
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9. Substance Use

- **Fitness for Duty:** Arrive at work and attend client sites free from the influence of

drugs or alcohol.

- **Prohibited Substances:** Possession, distribution, or use of illegal drugs on company or client property is forbidden.
 - **Medication:** If prescribed medication affects your performance, inform management for necessary accommodations.
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10. Use of Company Assets

- **Internet and Email:** Use these resources primarily for legitimate work activities.
 - **Property and Equipment:** Use and maintain company assets responsibly. Avoid misuse or unauthorized personal gain.
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11. Reporting Mechanism

- **Obligation to Report:** Report any suspected violations of this Code, other Trackita policies, or legal requirements immediately.
 - **Channels:** You may report concerns to your direct manager, Human Resources, or through any designated whistleblower hotline (where available).
 - **No Retaliation:** Trackita prohibits retaliation against anyone who makes a report in good faith.
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12. Disciplinary Action

- **Investigations:** Trackita will investigate all suspected violations promptly and fairly.
 - **Consequences:** Depending on severity, breaches can result in warnings, suspension, or termination of employment or contract. Legal violations may also be referred to authorities.
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13. Associated Policies

- **The client you are placed with will have a range of policies, and their policies will trump our policy and should be the reference for behaviour we expect at each organisation.**

14. Ongoing Commitment

- **Annual Confirmation:** Contractors and employees may be asked to review and confirm their understanding of this Code.
- **Updates:** Trackita reserves the right to modify this document at any time. Updates will be communicated as they occur.