

TRACKITA PTY LTD: MODERN SLAVERY POLICY

At Trackita Pty Ltd (“Trackita”), we are committed to upholding ethical labor practices and preventing any form of modern slavery within our operations or supply chains. This policy provides guidance on how we identify, address, and mitigate risks related to modern slavery.

Note:

1. This policy is not part of any employment contract.
2. Trackita may amend or withdraw this policy at any time.
3. The client’s policies for whom you are working are considered Trackita’s own policies; where client policies conflict with Trackita’s guidelines, the client’s policy prevails.

1. Purpose & Scope

- Purpose: To outline Trackita’s commitment to preventing modern slavery and human trafficking in our business operations and supply chains.
- Applicability: This policy applies to all employees, contractors, subcontractors, and suppliers associated with Trackita, regardless of their location.

2. Definitions

- Modern Slavery: Encompasses situations of forced labor, human trafficking, debt bondage, deceptive recruiting, and other practices that exploit individuals for personal or commercial gain.
- Supply Chain: Includes all third-party vendors, suppliers, and partners who provide goods or services to Trackita.

3. Our Commitments

1. Zero Tolerance
 - We will not tolerate any form of modern slavery or human trafficking in our operations or supply chains.
2. Compliance with Legislation

- We comply with all relevant modern slavery laws, including the *Modern Slavery Act 2018 (Cth)* in Australia, and any equivalent legislation in jurisdictions where we operate.
3. Transparency & Accountability
- We strive for transparency in how we conduct business and encourage internal reporting of any suspected breaches of this policy.
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4. Risk Assessment & Due Diligence

1. Risk Profiling
 - We periodically review our operations and suppliers to identify and evaluate risks of modern slavery.
 2. Supplier Onboarding
 - Suppliers must confirm compliance with Trackita's modern slavery requirements. Contractual clauses may be introduced to ensure ethical labor practices.
 3. Ongoing Monitoring
 - We will conduct spot checks or audits, especially for suppliers operating in high-risk regions or industries.
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5. Reporting & Whistleblowing

- Internal Reporting: Employees and contractors can report any modern slavery concerns through Trackita's Whistleblower Policy or directly to management.
 - External Reporting: Concerns regarding modern slavery may also be raised with relevant regulatory bodies (e.g., Australian Securities and Investments Commission).
 - Confidentiality & Protection: Trackita will protect whistleblowers against retaliation. Anonymous reporting is also permissible.
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6. Training & Awareness

- Employee Education
 - We provide employees and key suppliers with information on how to recognize indicators of modern slavery and how to report concerns.
 - Continuous Improvement
 - Training content is reviewed and updated regularly to address evolving risks and regulations.
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7. Responsibilities & Governance

- Board & Senior Management
 - Oversee the effective implementation of this policy and regularly review compliance efforts.
 - Managers & Supervisors
 - Monitor team activities, ensure everyone understands their responsibilities, and promptly address any reported issues.
 - Employees & Suppliers
 - Maintain ethical labor practices, remain vigilant to potential exploitation, and report any suspicions.
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8. Remediation

If modern slavery or related risks are identified:

1. Immediate Action: We will investigate internally or collaborate with relevant authorities or experts.
 2. Supplier Engagement: Where a supplier is involved, we will work with them to rectify the issue. Should the issue remain unresolved, we may terminate the relationship.
 3. Support for Victims: Where appropriate, Trackita will assist in connecting affected individuals to professional support services.
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9. Non-Compliance

- Consequences: Violations of this policy may result in disciplinary action, contract termination, or legal reporting, depending on the severity of the breach.
 - Client Supremacy: If a conflict exists between this policy and a client's modern slavery policy, the client's policy overrides Trackita's guidelines.
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10. Policy Review & Updates

- Annual Review: This policy will be reviewed at least annually, or earlier if significant changes occur in business operations or legislation.
 - Amendments: Trackita reserves the right to amend or withdraw this policy as needed to reflect best practices or updated legal requirements.
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Conclusion

By adhering to this Modern Slavery Policy, Trackita aims to preserve a workplace culture built on respect, human rights, and ethical integrity. We encourage everyone—employees, suppliers, and clients—to cooperate in identifying and eradicating any form of modern slavery within our sphere of influence.