

## TRACKITA PTY LTD WHISTLEBLOWER POLICY

### Speak Out Without Fear

At Trackita Pty Ltd, we are committed to conducting our business ethically and in line with our core values of fairness, honesty, and integrity. This Whistleblower Policy provides clear guidance on how you can confidentially report any wrongdoing without fear of retaliation.

#### Note:

1. This policy does not form 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.

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## 1. Guiding Values

- Integrity: We strive to do the right thing in all our dealings.
- Fairness & Honesty: We are transparent and accountable.
- Confidentiality & Protection: We handle complaints discreetly and safeguard whistleblowers from detrimental treatment.

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## 2. Purpose of This Policy

- Safe Reporting: Enable anyone connected to Trackita to raise concerns about misconduct safely and confidentially.
- Legal Obligation: Comply with applicable Australian whistleblower legislation.
- Zero Tolerance for Retaliation: Ensure no one is penalized for reporting issues in good faith.

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## 3. Who Does This Policy Cover?

This policy applies to any individual linked to Trackita Pty Ltd, including but not limited to:

- Employees (full-time, part-time, or casual)
  - Managers and Directors
  - Contractors, Subcontractors, and their staff
  - Suppliers and their employees
  - Consultants and Auditors
  - Family members of the above
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## 4. What Can Be Reported?

You are encouraged to report any suspected or actual misconduct, such as:

- **Illegal Acts:** Theft, fraud, corruption, or any criminal activity.
- **Unethical Conduct:** Dishonest behavior, conflicts of interest, or deliberate breaches of company policies.
- **Serious Risks:** Actions causing or threatening to cause harm to individuals, the public, or the environment.
- **Company Policy Breaches:** Serious violations of rules, including harassment, bullying, or discrimination.
- **Financial Irregularities:** Potential misuse of company assets, accounting fraud, or incorrect financial statements.

**Non-Reportable Issues:** Personal work-related disputes or grievances may not qualify for legal whistleblower protections. Use the Grievance Policy or speak to Sue Haywood for such matters.

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## 5. How to Report Concerns

### 5.1 Internal Reporting

- **Confidential Contact:** Report concerns directly to our Whistleblower Protection Officer:  
Name: Sue Haywood  
Email/Contact Details: [Please insert appropriate email/phone here]
- **Alternate Channels:** If you cannot or do not wish to contact the Whistleblower Protection Officer, you may approach any senior manager (e.g., COO, account leads).

### 5.2 Anonymity

- Optional: You can report anonymously. Although it may assist the investigation if we know your identity, you are not required to reveal it.

### 5.3 External Reporting

- Regulatory Bodies: You may report wrongdoing to the Australian Securities and Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA).
- Legal Advice: It is permissible to discuss potential misconduct with a lawyer, especially if you seek advice on whistleblower protections.

### 5.4 Emergency or Public Interest Disclosure

- In extreme circumstances, disclosures can be made to journalists or politicians. However, such disclosures must follow the prescribed legal process, including an initial report to ASIC or APRA and a 90-day waiting period.
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## 6. Investigation & Follow-Up

1. Initial Assessment: Upon receiving a report, the Whistleblower Protection Officer will evaluate the allegations.
  2. Investigation Process: An impartial investigator (internal or external) may be appointed.
    - Confidentiality: Your identity will remain confidential unless you consent to be identified or the law compels us to disclose it.
    - Fair Process: The individual(s) accused of wrongdoing will be given an opportunity to respond.
  3. Progress Updates: Where possible, you will be kept informed of the investigation's progress and outcome, respecting legal and privacy constraints.
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## 7. Protection & Confidentiality

### 7.1 No Retaliation

- Zero Tolerance: You will not be fired, demoted, harassed, or otherwise harmed for making a disclosure in good faith.
- Reporting Leaks: If you believe your identity has been revealed without permission, notify a Whistleblower Protection Officer immediately.

### 7.2 Confidentiality Measures

- Need to Know Basis: Your details and the information you provide will only be shared with individuals essential to investigating and addressing the issue.
  - Legal Requirements: We will not release your identity unless legally required (e.g., by court order or specific legislation).
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## 8. Support Services

1. Employee Assistance Program (EAP)
    - Confidential Counseling: Free, private counseling is available to all employees. Details can be found on the Company Hub or from HR.
  2. Designated HR Support
    - An HR representative may be assigned to provide ongoing assistance.
  3. External Help Lines
    - Lifeline: 13 11 14
    - Beyond Blue: 1300 22 4636
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## 9. Consequences of Policy Breach

- Serious Offence: Violating or undermining this policy (e.g., retaliating against a whistleblower) may lead to disciplinary action, including termination.
  - Policy Modifications: Trackita retains the right to revise or withdraw this policy at any time.
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## 10. Related Policies

- Code of Conduct
  - Grievance Policy
  - Bullying & Harassment Policy
  - Client Policies (remember: the client's policies for whom you are working are considered Trackita's own; where conflicts arise, client policies prevail)
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### Final Note

Your willingness to speak up ensures that Trackita maintains high ethical standards, protects its reputation, and fosters a safe, supportive environment. Thank you for taking the initiative to

report wrongdoing when you see it, and please remember: you will be protected when you do the right thing.