

Whistleblower Policy

At TriCab we are guided by our values, which form the foundations of how we behave and interact with others. Together our values reflect the priorities of the business and provide guidance on decision making. All TriCab policies and procedures are developed to align with our values and ensure we observe the highest standards of fairness and honesty in all our business activities.

Purpose

This policy is in place to ensure employees and other workers can raise concerns regarding any serious wrongdoing (including unethical, illegal, corrupt or other inappropriate conduct) without being subject to victimisation, harassment or discriminatory treatment.

The aim of this policy is to:

- encourage Workers to disclose an issue if they genuinely believe someone has engaged in serious wrongdoing;
- encourage Workers to disclose an issue where our quality systems are not performing to our requirements, including Work Health and Safety, Chain of Responsibility and Environment;
- outline how TriCab will deal with all disclosures of serious wrongdoing;
- set out the avenues available to Workers to disclose serious wrongdoing to TriCab; and
- ensure that Workers who make a disclosure are not exposed to inappropriate responses.

Whilst it is generally expected that these issues will be raised through the normal channels of line management or our quality systems, disclosing by these avenues may be appropriate or necessary in certain situations.

Scope

This Policy applies to all TriCab employees, directors, officers (including employees of contractors), suppliers, consultants and spouses, relatives or dependents of any previously mentioned persons.

What should be disclosed?

Any matter that a Worker genuinely believes is in breach of TriCab's policies or the law should be disclosed in accordance with this Policy.

Disclosable matters include any conduct which involves or may result in:

- Unauthorised use of company assets or taking of company money or providing another party with company assets or money;
- Receiving money for influence or "turning a blind eye";
- Taking part in action or actions that might be considered illegal (e.g. activities that are a breach of the Australian Consumer Law, Anti-Discrimination Laws; Fair Work Laws, etc);
- Being associated with criminal or threatened criminal activity (e.g. dealing in or use of illicit drugs, violence or threats of violence whether to gain advantage or not and criminal damage against property whether to gain advantage or not) or other breaches of state or federal law;
- Unethical behaviour, including anything that would breach the TriCab policies such as dishonestly altering company records or data, adopting questionable financial practices or wilfully breaching TriCab policies or procedures;
- Potential damage to TriCab, a TriCab employee or a third party, such as unsafe work practices, environmental damage, health risks or abuse of TriCab property or resources;
- an abuse of authority;

- financial loss to TriCab or damage its reputation or be otherwise detrimental to TriCab interests;
- harassment, discrimination, victimisation or bullying, other than personal work-related grievances as defined in the Corporations Act 2001 (Cth) ("Corporations Act");
- any other kind of misconduct or an improper state of affairs or circumstances;
- behaviour that is oppressive, discriminatory or grossly negligent; or
- any other conduct which may cause loss to TriCab or be otherwise detrimental to the interests of TriCab.

Responsibility to disclose

TriCab relies on its employees and Workers to help maintain and grow the culture of honesty and fairness. Any Worker that becomes aware of such conduct as detailed under this policy must disclose it either in accordance with TriCab policies and procedures or under this specific Policy.

Protection

A Worker making a disclosure in good faith in accordance with this Policy (a "Whistleblower") will not be discriminated against or disadvantaged in their employment or engagement with TriCab, even if the disclosure is subsequently determined to be incorrect or not substantiated.

All reasonable steps will be taken to ensure that a Whistleblower will not be subject to any form of victimisation, discrimination, harassment, demotion, dismissal or prejudice, because they have made a disclosure. However, this Policy will not protect the Whistleblower if they are also involved in or connected to the improper conduct or illegal activities that are being disclosed.

Anonymous Disclosure

A disclosure can be made anonymously. However, it may be difficult for TriCab to properly investigate anonymous disclosures. If authorities take further legal action on the disclosed matter, it may become necessary for a Whistleblower to identify themselves. If the Whistleblower wishes to benefit from statutory protections provided to Whistleblowers (for example, under the Corporations Act 2001), they may also have to disclose their name. In these instances, TriCab will continue to ensure that the Whistleblower is protected from retaliation.

Disclosures in Good Faith

A disclosure may have serious consequences, including potential damage to the career prospects and reputation of people who are the subject of allegations of wrongdoing. Therefore, it is very important that those who make a disclosure under this Policy do so in good faith, with reasonable grounds for believing that the information is correct or likely to be correct.

TriCab takes all disclosures made under this Policy very seriously and looks particularly unfavourably on any false disclosures or claims. Disciplinary action may be taken against any employee who makes a disclosure that is not in good faith. A disclosure will not be considered to be made in good faith if it is frivolous, raised for a malicious reason or ulterior motive, or if it is not based on facts and/or circumstances that provide a reasonable basis for the disclosure. Repeated disclosures about trivial matters may also be considered not to be made in good faith.

Making a disclosure

Please refer to the Whistleblower Guidelines for detailed options on how to make a disclosure.

Investigating a disclosure

Where a disclosure is made in good faith about a matter that comes under this Policy, the Human Resources Manager will investigate the disclosure. Where deemed necessary, an external investigator may be engaged to

conduct an independent investigation. Where necessary an external expert may also be engaged to assist with an investigation. All investigations will be conducted in a fair and independent manner and all reasonable efforts will be made to preserve confidentiality of an investigation.

To avoid jeopardizing an investigation, a Worker who has made a disclosure under this Policy is required to keep confidential the fact that a disclosure has been made (subject to any legal requirements).

Investigation Feedback

The external Whistleblower Service will provide you with a reference number. You will need to write down the number provided – you will need this number to provide further information (resume a report) or to check the status of the disclosure (safe portal login). You can check back in to see if there is an update. This will allow you to retain your anonymity.

Disclosures to other bodies

In certain circumstances a Worker may have a legal obligation to make a report to a statutory body or government department. Workers should ensure that they comply with all such reporting requirements. The Human Resources Manager can advise Workers on these reporting obligations.

Breach of this Policy

Any breach of this Policy will be taken seriously and may result in counselling and/or disciplinary action, up to and including summary dismissal.

Authorised by:



Meng Chong
CEO – AUS & NZ