

Whistleblower Protection Principles

You can tell us if you think there's something wrong.

If you have concern about conduct within WiseTech Global which appears to you to be illegal, unethical or otherwise improper, you should feel confident about raising concerns internally, because we have established a reporting and investigative mechanism that is objective, confidential and independent and protects you from reprisal or disadvantage.

Under these Principles:

- you are encouraged to report your concerns, whether openly or, if required, anonymously
- if you report your concerns, we will keep your report confidential unless you indicate (or the law requires) otherwise
- concerns reported by you will be properly investigated with a view to establishing the truth and correcting any wrongdoing where possible
- you will be advised of the outcome of the investigation and any action taken as much as practicable
- you will not be victimised or adversely affected because of your action in reporting your concerns (provided of course that there is a basis for your concerns, and that you have acted in good faith and without malicious intent and that you have not yourself engaged in serious misconduct or illegal conduct).

1. What is Whistleblowing?

Whistleblowing is simply reporting wrong-doing (illegal, improper or unethical actions) by a company or a person.

2. Principles on Whistleblowing

These Principles apply to anyone who is employed by or works at WiseTech Global, including employees (whether permanent, part time, fixed-term or temporary), contractors, consultants, secondees and Directors.

We all have a responsibility to help detect, prevent and report instances of suspicious activity or wrongdoing, referred to as a "Reportable Matter" and described at paragraph 4 of these Principles. We are committed to ensuring that all employees have a safe, reliable and confidential way of reporting any Reportable Matters.

You are encouraged to raise concerns about any issue or suspicion of Reportable Matters at the earliest possible stage with your immediate manager and serious matters will then be escalated through to senior management. However, we are aware that in some circumstances you may feel more comfortable to raise the issue with someone other than your manager.

Any report under these Principles may be made in the following order:

- Company Secretary
- General Counsel
- the Chair of the Audit & Risk Committee – via email to AuditChair@wisetechglobal.com

You may at any stage skip a person in the chain outlined above if that person is the subject of the report or if you have another reason to believe that the person is not likely to deal with the report properly.

Reports can also be made anonymously, using our whistleblowing [online portal](#), if required, however this may affect the ability to investigate the matter properly and to communicate with you about your report.

Nothing in these Principles should be taken as restricting you from reporting any matter or providing any information to a regulator (such as the Australian Securities & Investment Commission), WiseTech Global's auditor or a member of the legal team or any other person in accordance with any relevant law, regulation or other requirement.

3. Where help is needed

At any stage, you can report the matter to our General Counsel whether specifically or because you would like general advice on these Principles or their application to a given set of facts.

4. What is a “Reportable Matter”?

A Reportable Matter is any concern about the following conduct, or the deliberate concealment of such conduct:

- financial irregularity (including a fraud against WiseTech Global or other party)
- corrupt conduct
- criminal conduct
- failure to comply with any legal or regulatory obligation
- unfair or unethical dealing (with a customer, supplier or other party)
- unethical or other serious improper conduct, including breaches of WiseTech Global policies and principles.

5. Action required when your Report is made

The person who you make a report to under these Principles must do the following:

- give particulars of the report that has been made to the General Counsel.
- ensure that the matter is properly investigated by the General Counsel (who for the purposes of these Principles is the Whistleblowing Investigations Officer) or some other independent and suitably qualified person nominated by the Chair of the Audit & Risk Committee).

6. Investigation process

Investigation processes will vary depending on the precise nature of the conduct being investigated. The purpose of the investigation is to determine whether or not your concerns are substantiated, with a view to WiseTech Global then rectifying any wrongdoing uncovered to the extent that this is practicable in all the circumstances.

The investigation will be thorough, objective, fair and independent of you, anyone who is the subject of the Reportable Matter, and any business unit concerned. The investigation will also have proper regard to the principles set out in the Australian Standard on Whistleblower Protection Programs.

7. Communicating with you about your report

The Whistleblower Investigations Officer will keep you informed of the outcome of the investigation arising from your report, subject to considerations of the privacy of anyone who is the subject of the Reportable Matter and normal confidentiality requirements.

Where practicable, you will be provided with initial feedback within 10 days of making your report, and any further feedback on a fortnightly basis as the matter progresses.

8. Your protection

The person who you make a report to under these Principles may disclose your identity to the Whistleblower Protection Officer, but will otherwise keep your identity confidential. They will ensure that all files relating to your report are kept secure, and that information received from you is held in confidence and is only disclosed to a person not connected with the investigation if:

- you have been consulted and have consented to the disclosure; or
- it is required or permissible by law

It is possible that someone might work out your identity without there having been a breach of confidentiality, if the nature of your report points to one particular individual having made it, or otherwise as a consequence of the nature of the investigatory process.

WiseTech Global recognises that 'whistleblowing' can be a very stressful and difficult thing to do. As long as you are acting in good faith and without malicious intent and that you have not yourself engaged in serious misconduct or illegal conduct, to the maximum extent possible you will not be subject to disciplinary sanctions by WiseTech Global in relation to any matters that you report.

The Whistleblower Protection Officer will safeguard your interests, having regard to these Principles, the Australian Standard on Whistleblower Protection Programs, and any other applicable policies and laws.

In particular, the Whistleblower Protection Officer will take whatever action is possible consistently with these Principles to make sure that you are not personally disadvantaged for making your report, whether by any form of harassment, discrimination, dismissal, demotion, or any form of current or future bias.

If you claim to have been the subject of any such action as a consequence of making your report, and the matter cannot be resolved with you by management, the matter will be referred to the Chair of the Audit & Risk Committee.

Any person found in breach of the provisions in these Principles will be subject to disciplinary procedures, up to and including dismissal.

9. Appointment of the Whistleblower Protection Officer

The General Counsel is appointed as the Whistleblower Protection Officer with powers and duties consistent with the Australian Standard on Whistleblower Protection Programs.

10. False reporting

A false report of a Reportable Matter could have significant effects on WiseTech Global's reputation and the reputations of other staff members and could also cause considerable waste of time and effort.

Any deliberately false reporting of a Reportable Matter, whether under these Principles or otherwise, will be treated as a serious disciplinary matter.

11. Records

We will maintain a record of all whistleblowing incidents and actions taken under these Principles, so that these Principles can be periodically reviewed.

12. Questions

Any questions about these Principles should be directed to the General Counsel.

Specific questions about whistleblower protection issues can be directed to the Whistleblower Protection Officer.

13. Review

We will regularly review these Principles and their effectiveness.

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