



## CODE OF ETHICS

MacTrack Pty Ltd (MacTrack) and all MacTrack employees, contractors and service providers, consultants, suppliers and others representing or acting for, or on behalf of, MacTrack are required to comply with the following principles in relation to:

**INDUSTRY** – MacTrack will not engage in any form of business dealing or behaviour that is detrimental to its reputation and standing. MacTrack commits to working with others in upholding and enforcing good business practices and standards in the industries in which the Company operates.

**COMPANY**- MacTrack business dealings and behaviour will at all times be based on integrity, honesty and fairness. MacTrack will conduct all affairs to the highest business principles in a wholly responsible manner and endeavour to deliver to its utmost ability, a quality range of services to Clients.

**EMPLOYEES** –MacTrack is an equal employment opportunity (EEO) employer and is committed to fostering workplace free from discrimination, harassment, bullying and victimisation, where the rights of individuals are upheld and everyone is treated with respect, fairness, equality and dignity. MacTrack seeks productive and harmonious employment relationships, and will endeavour to ensure the wellbeing of all employees.

**CLIENTS** –MacTrack will at all times deliver the highest quality of services in all aspects of its business dealings. MacTrack is committed to building, investing and maintaining profitable business relationships built on mutual respect, trust and collaboration.

**COMPETITORS** –MacTrack will take a positive and firm approach to the delivery of its services in the marketplace; however will do so in an honourable and fair manner.

**MODERN SLAVERY** – MacTrack is committed to Operating its business in accordance with the Modern Slavery Act 2018 (Cth)

- Ensuring our people understand modern slavery and the risk it presents to our operations
- Providing our people with appropriate avenues for reporting potential instances of modern slavery within our operations, or the operations of our suppliers and/or clients
- Mitigating modern slavery risk within our operations
- Eliminating potential and/or actual modern slavery practices from our operations and supply chain
- Utilising the due diligence completed to date to facilitate effective action plans and 'next steps' in the pursuit of modern slavery risk mitigation and elimination using a proactive approach
- Ensuring appropriate transparency with our people, clients, suppliers and stakeholders regarding the maturity of our modern slavery due diligence process and the findings arising from this
- Enhancing our plan for measuring the effectiveness of our existing modern slavery risk framework.

In conducting our affairs, at work and to work related events and out-of-hours activities that are connected to our employment:

- Do not disclose confidential information learned through your work with MacTrack.
- Do not mix the personal and professional in ways likely to bring MacTrack its directors and staff into disrepute.
- Do not attribute personal comments to MacTrack without the authority of MacTrack. or imply endorsement of MacTrack of your views.
- Do not undermine your effectiveness at work."

MacTrack has zero-tolerance for unethical behaviour. Allegations of contraventions of the Code of Ethics will be investigated and disciplinary action will be taken where the contravention has been established.