

Whistleblower Protection Principles

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

If you have a concern about conduct within the WiseTech Global Group 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

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, as well as relevant third parties, have a safe, reliable and confidential way of reporting any Reportable Matters.

These Principles apply to anyone who is employed by or works with the WiseTech Global Group, including employees (whether permanent, part time, fixed-term or temporary), contractors, consultants, secondees, Directors. Any external parties that have knowledge of a Reportable Matter are also encouraged to report such matters in accordance with the processes outlined in these Principles.

These Principles are supplemented by applicable internal policies, laws and regulations.

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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 (if you are employed by or work with the WiseTech Global Group), or via the online portal if reporting from outside of the WiseTech Global Group, and serious matters will then be escalated through to senior management. However, if you are employed by or work with the WiseTech Group, 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 via our phone hotline at 1800 512 377 (if you are in Australia) or else, using our whistleblowing [online portal](#). However, please be aware that remaining anonymous 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 relevant 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, applicable internal policy, or other requirement.

3. Where help is needed

At any stage, you can contact the General Counsel if you would like general information regarding these Principles or to seek guidance on 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 the WiseTech Global Group 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 the WiseTech Global Group’s policies and principles.

5. Action required when your Report is made

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

- give particulars of the report to the General Counsel (if the initial report was not made directly to the General Counsel); and
- 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 General Counsel or 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 the WiseTech Global Group 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.

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 confidentiality requirements.

Where practicable, you will be provided with initial feedback within 14 days of making your report, and any further feedback on a regular basis as the matter progresses.

8. Your protection

The Senior Leader, People and Talent Operations is appointed as the Whistleblower Protection Officer under these Principles.

The person to whom you make a report under these Principles or any other applicable internal policy may disclose your identity (if known) to the Whistleblower Protection Officer (subject to applicable law), but must otherwise keep your identity confidential. They must 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.

The WiseTech Global Group 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 provided

that you have not yourself engaged in serious misconduct or illegal conduct, then to the maximum extent possible you will not be subject to disciplinary or other sanctions by the WiseTech Global Group in relation to any matters that you report.

The Whistleblower Protection Officer will safeguard your interests, having regard to these Principles, any relevant internal policies, and any other applicable policies and laws.

In particular, the Whistleblower Protection Officer will take such actions, consistently with these Principles, to ensure as far as reasonably possible 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 regarding a Reportable Matter, 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 employed by or that works with the WiseTech Global Group that is found to be in breach of these Principles will be subject to disciplinary procedures, up to and including dismissal.

9. False reporting

A false report of a Reportable Matter could have significant effects on the WiseTech Global Group's reputation and the reputations of its employees, consultants, secondees and Directors, 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 matter, and may result in disciplinary procedures (up to and including termination) for individuals employed by or working with the WiseTech Global Group.

10. Records

We will maintain a confidential record of all whistleblowing incidents and actions taken under these Principles.

11. Questions

Any questions about these Principles should be directed to the General Counsel or the Chair of the Audit & Risk Committee.

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

12. Review

We will regularly review these Principles and their effectiveness.

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