

Whistleblower Policy

1. Purpose

Straker Limited (**Straker** or **we**) is committed to doing business honestly, fairly and in compliance with all applicable laws. This policy encourages the reporting of serious concerns about misconduct and ensures those who speak up are protected from retaliation. It also ensures reports are handled consistently, fairly, and in a timely manner, in line with ASX Corporate Governance Principles and New Zealand law.

2. Scope

This policy applies to:

- All employees (permanent, fixed-term, temporary)
- Directors and officers
- Contractors, consultants, secondees and representatives
- Service providers, suppliers and their employees
- Former employees, officers and suppliers
- Subsidiaries, joint ventures and any third parties acting on our behalf (“Relevant Persons”).

3. Our Commitment

We will:

- Provide safe and confidential channels to report concerns
- Protect whistleblowers from retaliation, disadvantage or dismissal
- Investigate concerns promptly, fairly and confidentially - aiming to complete investigations within six (6) weeks where possible, with updates provided if extended
- Take appropriate action where wrongdoing is found
- Comply with all applicable laws, including the Protected Disclosures Act 2000

We expect the same commitment from everyone we work with.

4. What You Should Report

You should report conduct that you reasonably believe is:

- Dishonest, fraudulent or corrupt (including bribery)

- Illegal or a breach of regulation
- Serious misconduct, unsafe practices or environmental damage
- Abuse of authority or gross mismanagement
- Harassment, bullying or discrimination
- Concealing any of the above

This policy is not for personal work-related grievances (which should be handled under our grievance procedure).

5. How to Report

You can report concerns to any Whistleblower Protection Officer:

- Any Director
- The Company Secretary

Reports can be made in person, by mail, or via the contact details on our website.

You may also report to:

- The Company's external auditor
- An appropriate regulatory authority

You may report anonymously. All reports will be acknowledged within five (5) business days, unless the report is anonymous and contact details are not provided.

6. Investigation Process

All reports will be assessed and, if appropriate, investigated promptly and confidentially. The investigation process will include:

1. Initial assessment to confirm whether the matter is within scope of this policy
2. Appointment of an investigator (internal or external) with no conflict of interest
3. Collection and review of relevant evidence
4. Interviews with relevant parties
5. Provision of periodic updates to the whistleblower at least every four (4) weeks until conclusion

Investigations will be fair, objective and documented. Where possible, we will provide feedback to the whistleblower on the outcome, subject to legal and privacy limits. Criminal matters will be referred to the police or relevant authority.

7. Protections for Whistleblowers

We will:

- Keep your identity confidential unless you consent or disclosure is legally required
- Protect you from retaliation such as dismissal, demotion, harassment or discrimination
- Provide remedies if you suffer loss due to making a protected disclosure
- Protect you even if your concern is not substantiated, provided it was made in good faith

8. False Reporting

Deliberately false or malicious reports are prohibited and may result in disciplinary action.

9. Record Keeping

All whistleblower reports and investigation records will be kept securely and confidentially.

10. Responsibilities

- Board of Directors – Overall oversight of this policy and review of whistleblower reports from the Audit & Risk Committee, including number and type of disclosures, investigation status, outcomes, and any systemic issues identified
- Audit & Risk Committee – Monitor and review the operation of this policy, review whistleblower reports from the Company Secretary, and ensure appropriate actions are taken in response to disclosures
- Company Secretary – Day-to-day management, training and monitoring
- Managers – Ensure staff are aware of and understand the policy
- All Relevant Persons – Comply with the policy and report concerns

11. Training and Communication

- Policy training is part of new employee induction and refreshed regularly.
- Where appropriate, suppliers and business partners may be provided with information about our whistleblower protections.

12. Monitoring and Review

The Board, through the Audit & Risk Committee, is responsible for this Policy and monitoring and reviewing its operation.

The Company Secretary has day-to-day operational responsibility for this Policy and must ensure that training on this Policy and their rights and obligations under it is made available to all employees.

We're all responsible for this Policy's effectiveness, so all our people must use it to speak up and disclose whistleblowing concerns.

This Policy will be reviewed periodically to check that it is operating effectively and whether any changes are required. We'll implement any changes in a timely manner.

13. Questions

You're welcome to comment on this Policy and suggest improvements – contact the Company Secretary (companysecretary@straker.ai) to do so.

Last reviewed: August 2025