Whistleblower Policy

Purpose

TriTech Software Development Corp. and Its Affiliates (“TriTech") are committed to maintaining a culture of transparency, accountability, and ethical conduct. This Whistleblower Policy is established to encourage employees, contractors, vendors, clients and other stakeholders to report any concerns or suspected violations of laws, regulations, or ethical standards in regards to TriTech. The policy aims to protect individuals who raise genuine concerns from retaliation and ensures a fair and confidential process for investigating and addressing such reports.

Types of Concerns

Concerns that should be reported under this policy include, but are not limited to:

- Financial fraud or mismanagement;
- Violations of laws or regulations;
- Unethical business practices;
- Health and safety hazards;
- Information security vulnerabilities; and,
- Harassment or discrimination.

Reporting Channels

All stakeholders can report concerns through the TriTech’s website at https://tritechsoft.com/ethics-tritech.

Employees and other internal stakeholders may also report concerns directly to TriTech’s Human Resources Department.

Confidentiality, Anonymity, and Protection from Retaliation

All reports will be treated confidentially to the extent permitted by law. TriTech will make reasonable efforts to protect the identity of anyone who reports a concern, subject to the need to conduct a thorough and fair investigation.

TriTech recognizes the importance of providing an anonymous reporting option and reports can be made anonymously.

TriTech prohibits any form of retaliation against individuals who, in good faith, report concerns or suspected violations. Any employee or other TriTech-affiliated person found to engage in retaliatory actions will be subject to disciplinary action, up to and including termination.

Investigation Process

TriTech will designate an appropriate party or committee to investigate reports of concerns or suspected violations. This may involve internal personnel, external experts, or a combination of both, depending on the nature and severity of the reported issue.

Those making a report are encouraged to cooperate with any investigation by providing additional information or clarification as needed. However, TriTech respects the need for confidentiality and will strive to minimize any potential impact on the reporting party.

Upon completion of any investigation related to a report, TriTech will take appropriate corrective actions based on the findings. The reporting party may be informed of the outcome to the extent allowed by law and without compromising the privacy and rights of involved parties.