

Whistleblower Policy

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1. Introduction

At Smartex, we are committed to maintaining an open, honest, and ethical environment. We encourage anyone—whether employees, clients, suppliers, partners, or candidates—to report any concerns they have regarding misconduct. This policy ensures that all reports are handled with care, and everyone feels safe and supported when raising concerns.

2. Why Reporting is Important

Integrity is at the core of how we operate at Smartex. Reporting concerns helps maintain trust, ensures compliance with laws and policies, and prevents potential harm to our business, people, and stakeholders.

3. What Should Be Reported

Whether you're an employee or an external party (such as a client, supplier, partner, or candidate), you should report any behavior that you believe:

- Involves fraud, theft, or other illegal activities
- Violates company policies or ethical standards

- Is related to harassment, discrimination, or workplace bullying
- Represents a serious conflict of interest
- Poses a threat to health, safety, or the environment
- Violates contractual obligations or agreements.

4. Who Can Report

This whistleblower channel is open to:

- Employees
- Suppliers and Vendors
- Clients
- Job Candidates
- Partners

5. How to Report

You can raise concerns in the following ways, depending on your relationship with Smartex:

1. Internal Reporting (Employees):
 - a. Direct to Your Manager: Employees are encouraged to speak directly with their manager or leadership team about their concerns.
 - b. HR Department: Employees can report any issues to the People team at hr@smartex.ai.
 - c. Whistleblowing Channel: For confidential or anonymous reporting, employees can use our whistleblowing channel at [this link](#).

2. External Reporting (Clients, Suppliers, Partners, Candidates):
 - a. Whistleblowing Channel: External parties can submit concerns confidentially through our whistleblowing channel by visiting [this link](#).

6. Who Handles the Complaints

Each report will be reviewed and handled by the appropriate team, depending on the nature of the concern and who is reporting:

1. Internal Employee Complaints:
 - a. Reports related to workplace behavior, harassment, or policy breaches will be handled by the People Department.
 - b. Reports of legal or financial misconduct (e.g., fraud, theft) will be handled by People Department and escalated to the CEO.
2. External Party Complaints (Clients, Suppliers, Partners, Candidates):
 - a. Complaints involving business practices or ethics will be managed by the CEO.
 - b. Issues related to recruitment processes (candidates) will be managed by the People Team in collaboration with the CEO.
3. Concerns involving contractual violations will be handled by the relevant department (e.g., procurement or business development), with oversight from our lawyer.

If you make a complaint in our [whistleblower channel](#), you can choose a different person to handle the complaint. For example: If the complaint

involves the People Team, you can choose the CEO to review the case instead.

7. No Retaliation

We are committed to ensuring that no one faces retaliation for reporting a concern with honest intentions. Whether you're an employee or an external party, your report will be treated seriously, and you will be protected from any form of retaliation. If retaliation occurs, it should be reported immediately.

8. What Happens After You Report

Once a report is submitted, we follow a clear timeline to ensure thorough investigation and action:

1. **Initial Review and Analysis – Within 1 month:**
 - a. Internal Employee Complaints:
 - a. After receiving your report, the assigned team will conduct an initial analysis to understand the nature of the complaint.
 - b. You will be informed that your report is under review.
2. **Investigation and Action – Within 3 months:**
 - a. A thorough investigation will be conducted based on the report's findings.
 - b. Appropriate actions will be taken within these 3 months, whether corrective actions, disciplinary measures, or other relevant steps.
 - c. Throughout this process, we will keep you informed of the status, while maintaining confidentiality where necessary.

We will do our best to adhere to these timelines and ensure that all concerns are addressed fairly and in a timely manner.

9. Commitment to Integrity

At Smartex, we are committed to the highest standards of ethics and transparency. We rely on your voice to help us uphold these values. If you witness any misconduct or behavior that does not align with our ethics, please speak up.