

# WHISTLEBLOWER POLICY

## 1. INTRODUCTION

Track Group, Inc. and all of its subsidiaries (collectively the “Company”) is committed to maintaining the highest standards of business conduct and ethics, as well as full compliance with all applicable government laws, rules and regulations, corporate reporting and disclosure requirements, and proper accounting practices.

## 2. REPORTING RESPONSIBILITY

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Track Group can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and contractors to report concerns about violations of the Company’s Code of Business Conduct and Ethics or suspected violations of law or regulations that govern Track Group’s operations.

For the purposes of this Whistleblower Policy, inappropriate conduct and actions are intended to be broad and comprehensive and to include any matter, which in the view of the complainant, is illegal, unethical, fraudulent, dishonest, contrary to the policies of the Company or in some other manner not right or proper.

Examples would include:

- violation of any applicable law, rule or regulation;
- violation of any corporate policies, including health, safety, environmental, operational;
- violation of the Company’s Code of Business Conduct and Ethics;
- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company or any of its subsidiaries;
- fraud or deliberate error in the recording and maintaining of financial records of Company or any of its subsidiaries;
- deficiencies in or noncompliance with Company or any of its subsidiaries’ internal policies and controls;
- billing for services not performed;
- misrepresentation or a false statement by or to a Director, Officer or employee of Company or any of its subsidiaries respecting a matter contained in the financial records, reports or audit reports; and
- deviation from full and fair reporting of Company’s consolidated financial condition.

## 3. COMMUNICATION OF THE WHISTLEBLOWER POLICY

To ensure that all Directors, Officers, employees, consultants and contractors of the Company are aware of the Whistleblower Policy, a copy of the Whistleblower Policy will be distributed to all Directors and Officers and posted in all office locations with Company and made available on the Company’s website for their review. All Directors, Officers and employees will be informed whenever significant changes are made. New Directors, Officers and employees will be provided with a copy of this Whistleblower Policy and will be educated about its importance.

#### **4. REPORTING PROCEDURE FOR ALLEGED VIOLATIONS AND COMPLAINTS**

Any person with a serious internal concern relating to the Company, or any subsidiary of the Company, may submit his/her concern to the Chairperson of the Audit Committee (the “Chairperson”) through the third-party hotline below. Reporting is available 24 hours a day, 7 days a week. Reports may be made in the following manners:

- **Website:** [www.lighthouse-services.com/trackgrp](http://www.lighthouse-services.com/trackgrp)
- **E-mail:** [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name with report)
- **Fax:** (215) 689-3885 (must include company name with report)
- **Toll-Free Telephone:**
  - **English speaking USA and Canada: 844-420-0044**
  - **Spanish speaking USA and Canada: 800-216-1288**
  - **Spanish speaking Mexico: 01-800-681-5340**
  - **French speaking Canada: 855-725-0002**

All submissions shall be treated on a confidential and anonymous basis.

#### **5. NO ADVERSE CONSEQUENCES**

Pursuant to its charter, the Audit Committee of the Board of Directors of the Company (the “Audit Committee”) is responsible for ensuring that a confidential and anonymous process exists whereby persons can report any inappropriate conduct and actions relating to the Company and any subsidiaries. A submission regarding inappropriate conduct and actions may be made by an officer or employee of the Company without fear of dismissal, disciplinary action or retaliation of any kind. The Company will not discharge, discipline, demote, suspend, threaten or in any manner discriminate against any person who submits in good faith a violation, inappropriate conduct and actions or provides assistance to the Audit Committee, Management or any other person or group, including any governmental, regulatory or law enforcement body, investigating a violation or other inappropriate conduct and actions.

#### **6. TREATMENT OF SUBMISSIONS**

Reports of violations or inappropriate conduct will be reviewed as soon as possible by the Audit Committee with the assistance and direction of persons the Audit Committee thinks appropriate including, but not limited to, general counsel, auditor, or external legal counsel and the Audit Committee shall implement such corrective measures and do such things in an expeditious manner as it deems necessary or desirable to address the report of inappropriate conduct.

#### **7. RETENTION OF RECORDS**

The Audit Committee shall retain all records relating to any submission of inappropriate conduct and actions or report of a retaliatory act and to the investigation of any such report for a period judged to be appropriate based upon the merits of the submission. The types of records to be retained by the Audit

Committee shall include records of all steps taken in connection with the investigation and the results of any such investigation.

#### **8. POLICY REVIEW**

The Audit Committee will review and evaluate this Whistleblower Policy on an annual basis to determine whether the Whistleblower Policy is effective in providing a confidential and anonymous procedure to report violations or complaints regarding inappropriate conduct and actions.

#### **9. ACTING IN GOOD FAITH**

Anyone submitting a complaint concerning a violation or inappropriate conduct must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

#### **10. ACCESS TO THE POLICY**

This Policy will be posted in all office locations and on the Company's website at: [www.trackgrp.com](http://www.trackgrp.com) **within the Corporate Governance tab of the Investors section.**