



Turret Engineering Pty Ltd

Integrated Management System Policy

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Document No:	POL-IMS-001	Version:	V1R1	Date:	01/01/2024
Approved By:	Managing Director	Team:	Management	Review:	1 Year



Company Policy

Document Acceptance, Document Control, Retention & Release and Safe Working Culture

The above document is a controlled document. For identification of amendments, each page contains a version number, revision number and a page number. Changes will be issued only as a complete replacement document. Recipients should remove superseded versions from circulation. These policies apply to all work-related activities on or off site and relates to meetings, training, work, events, functions, and general situations classified as a work-related event. **This MUST be read & used in conjunction with RACI Matrix.**

All personnel (employees & contractors) are encouraged to participate in developing, implementing and upholding our policies, procedures and facilitate continuous improvement. Please submit all requests for changes to the Approver of this document.

Documents are reviewed as required (changes notified or due dates), communicated with team, management, implemented across the business. Adherence to plan & Key Performance Indicators (KPIs) and targets are measured, recorded, discussed and used for continuous improvement. Documents are retained as required and archived in system electronically (as per tabulation below). We are committed to track performance of our system, engage stakeholders & continue to evolve, improve and enhance our systems and procedures etc.

Our management upholds a safe working culture conducive to encourage participation from all personnel, open door (open office) policy to encourage personnel to approach and escalate any issues that needs addressing. We welcome ideas, opportunity for upskilling, encourage a work life balance and manage risk and stress at workplace.

Failure to comply with our policies may result in disciplinary action, including but not limited to verbal or written warnings, suspension, or termination, depending on the severity of the breach.

Approved for Release By:

Rob Hair
Managing Director
Date: 08/01/2025

We encourage you to report unsafe acts or work conditions to your supervisor or management. Where required, you may remove yourself from work situations that you may consider present an imminent danger to life or health. We take all such matters with diligence and investigate to mitigate risk. You will not be unduly subjected to any pressure consequently for doing so.

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Document Retention:

Category	Retention Period	Comments
Taxation	5 Years	Accounts Payable, Invoices also stored in accounting system
Importation	5 Years	Stored in Server as part of Packing Slip – Delivery
Export	5 Years	Stored in Server as part of Packing Slip – Delivery
ASIC	Indefinite	By accountants as part of Company, Trust documentation
Employment	7 Years	Employment records, payroll, wages
WHS records	7 Years	worker’s compensation etc.

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Company Policy

WORKPLACE HEALTH SAFETY AND ENVIRONMENT (WHSE) POLICY

We acknowledge responsibility to provide a safe and healthy (physical & mental health) work environment for all personnel. We are committed to maintaining high safety standards in all our undertaking: employment of workers, contractors, clients, and visitors to site. We are committed to ensure that we put people and our community first. Our objective is to reduce and eliminate hazards, risk, workplace injuries and prevent work related ill health impact while continuing to reduce and eliminate hostile impact on environment and commitment to continuous improvement and fulfill compliance obligations.

Our target is:

Goal Zero - No injuries and incidents.

Management is committed to:

- Integrating health, safety and environment into all aspects of our operations
- Compliance with legislative requirements as a minimum and co-operation with Regulatory agencies
- Implement Industry Best Practice Standards
- Continuous Improvement and benchmarking Key Performance Indicators
- Open and honest consultation and communication with stakeholders
- Development, implementation, and review of written safe work procedures
- Distribution and communication of safety information and safe work procedures
- Information, training and supervision of workers contractors, clients, and visitors
- Review and assessment of policies & procedures.
- Eliminate hazards, reduce risks and prevention of work-related aspects impacting health.

Employees are expected to:

- Take reasonable care for the health and safety of self and others at work.
- Report all incidents, injury, and non-conformances.
- Co-operate with management to enable compliance with obligations.
- Participate in consultative engagements and training.
- Participate in return-to-work programs.

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Rob Hair

Managing Director

Date: 08/06/2025

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Company Policy

ANTI-DISCRIMINATION, EQUAL EMPLOYMENT OPPORTUNITY, HARASSMENT & BULLYING POLICY

We are committed to the principles of equal employment opportunity and have procedures in place to effectively deal with complaints of discrimination. We are committed to ensure that no persons are discriminated against (directly or indirectly) because of the following:

- Race
- Impairment
- Sex
- Marital or parental status
- Lawful sexual activity
- Physical features
- Age
- Religion
- Political belief or activity
- Trade union/industrial activity
- Pregnancy or breastfeeding

We will not tolerate unfavourable treatment including:

- Refusal of employment or termination
- Unfair terms & conditions of employment
- Denying or limiting benefits and career growth
- Placing unreasonable work practices to comply with because of their personal characteristics.

In this policy, harassment includes workplace harassment or bullying, which is termed as the act of repeated less favourable treatment of a person by another or others in the workplace, which may be considered unreasonable and inappropriate practice. This includes behaviour that intimidates, offends, degrades, or humiliates.

Sexual harassment is any form of unwelcome sexual attention that might offend, humiliate, or intimidate the other person and may be experienced by women or men. It includes uninvited touching or physical contact; leering at a person or at parts of their body; talking about your sex life or asking about another person's sex life; sexual jokes or propositions; sexually offensive communications (phone, email, SMS, or other social media.)

In addition to legal liability, non-compliance with this policy will result in disciplinary action.



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HAZARDOUS CHEMICALS MANAGEMENT POLICY

We will ensure that hazards associated with the introduction, use, handling, storage, and disposal of hazardous chemicals are identified, assessed and controlled as far as practicable.

We will implement controls and systems to manage all hazardous chemicals and:

- Maintain a register of hazardous chemicals.
- Post signage and placarding to legislative requirements.
- Undertake risk assessments.
- Store in suitable facilities.
- Substitute with less hazardous chemicals where practicable.
- Comply with providing information:
 - Labelling
 - Safety Data Sheets (SDS) available and current (within 5-year issue date)
 - Safe Work Instructions & Methodology
 - Assessment of Risk
 - Training and Supervision
- Monitor Health and Impact through a Designated Responsible Persons
- Make available suitable Personal Protective Equipment (PPE)
- Undertake Regular Workplace Observation Audits
- Review risk & controls are reviewed.
- Undertake action to reduce impact and effects.



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FIT FOR WORK, DRUG AND ALCOHOL POLICY

In conjunction with to our WHSE Policy, we acknowledge responsibility to provide a safe and healthy work environment for all personnel. We are committed to maintaining high safety standards in all our undertaking: employment of workers, contractors, clients, and visitors to site.

Misuse or abuse of alcohol, drugs, substances, and fatigue represents a significant problem to both employers and employees and has potential to cause incidents, accidents etc.

We are committed to a work environment in which the safety and performance of workers is not adversely affected using alcohol or other drugs and fatigue.

All personnel (workers, visitors, and contractors) must not perform any work duties under fatigue or the influence of alcohol or any other drug. Affected personnel are required to stop work immediately and report to site and line management. Affected personnel are prohibited from:

- Driving on site
- Reporting to work on or off site
- Operating any form of plant and / or equipment
- Use of company vehicles

Impairment due to prescriptive medication must be reported immediately to ensure safety and wellbeing of all personnel. All personnel must comply with various site requirements for fatigue management and work on a max 14-hour Drive in Drive Out or as per client policy schedule from residence to work and return.

All personnel must submit to any test required to ensure fit for work.

A breach of this policy will lead to disciplinary action including termination of employment.



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PERSONAL PROTECTIVE EQUIPMENT (PPE) POLICY

The purpose of PPE is to protect personnel from exposure to hazards. The PPE is provided to personnel at no cost to them. PPE provided must conform to site safety requirements and relevant Material Safety Data Sheet (MSDS) where applicable.

PPE is only a last line of defence in managing risk and injury to personnel. Use of PPE is mandatory and must be used without compromise.

Management & staff are committed to ensure:

- PPE is suitable and conforms to legislated requirements.
- Conformance to relevant Australian Standards
- Train personnel on safe use and manage compliance through Workplace Observation Audits.

Audits.

- Comply with site specific requirements.
- Conduct inspection and checks as required to ensure PPE is being used by workers.
- Use of PPE as intended and appropriately.
- Report any abuse and damages to facilitate replacement.

Mandatory PPE may vary on different sites and all personnel are required to familiarize themselves with site policies and PPE requirements. PPE requirements may include:

- Safety Helmet
- Safety Glass
- Long Pants & Long Sleeves with Reflective Strips
- Safety Shoes
- Gloves – while lifting products
- Harness and Chin Strap – while working at height
- Respiratory mask – while handling and working with chemicals



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RETURN TO WORK POLICY

We are committed to developing programs to ensure the injured workers return to pre-injury duties (where possible) in a timely manner. We are committed to achieve this while maintaining confidentiality, employee engagement, medical and expert advice, and cooperation.

In case of an incident resulting in injury we will undertake the following:

- Return to Work commences as soon as practicable.
- Primary focus should be on “Employee Wellbeing and Transition” to normal duties.
- Return to Work plan is drafted in consultation with all stakeholders.
- Periodically monitored, reviewed, and facilitated by the designated stakeholders.
- Modification of work practice, duties etc. where required.
- Find alternate duties to support injury management.
- Education, training, and re-training where required.

Employees must participate in the program by:

- Continuously communicating and keeping informed of progress
- Maintaining ongoing communication
- Identify suitable or alternate duties.
- Willingness to accept alternate duties were agreed by stakeholders.



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CORPORATE SOCIAL RESPONSIBILITY POLICY

We are committed towards upholding our Values of Completing our Undertakings in a **Responsible and Effective** manner. We recognise the need to consider the impact of our operations have on wider community, environment, and sustainability.

True to this pledge we declare that our actions are driven by our commitment to:

- Add Value to socio-cultural fabric of our community.
- Environmental Sustainability
- Ethical Trade Practices
- Workplace Giving to the global community.
- Promote Education & Training

Considering our place in the local and global fabric we will invest and resource our programs and promote participation of personnel and management to:

- Position our operations locally and offer employment opportunities.
- Create & Commit to Biodiversity & Sustainability
- Support the program to enhance *“Live Local & Local Procurement”*.
- Donate and Support Local & Global Communities in Need
- Fair conditions of employment and **Zero Tolerance** to child labour
- Support Education & Attainment of Knowledge for empowerment.



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ENVIRONMENTAL SUSTAINABILITY POLICY

We support and commit to reduce our impact on the environment. We are also committed to adopt practices that use resources sustainably.

Our Integrated Management System highlights our comprehensive plan to achieve, maintain and enhance our performance, which also includes accountabilities and actions to drive business performance and commitment to continuous improvement and fulfill compliance obligations.

Our objectives are evident from our commitment to achieve:

- ISO 14001
- Sustainable energy use
- Reduce greenhouse gas emissions and ozone depleting substances.
- Optimise office waste, building waste, and enhance resource recovery.
- Deliver solution towards sustainable recovery & use of water resources.
- Commitment to continual improvement and fulfill compliance obligations.



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QUALITY POLICY

Turret Engineering Pty Ltd (Turret) produces the “Turret”; a floating water intake device that provides solution for dewatering of shallow waterbodies. We develop our solutions by understanding the industry needs, engaging with customers, and seeking their feedback. To meet changing needs and growing quality requirements, we have developed and implemented a Quality Management System that complies with the requirements of the standard. To achieve and maintain the highest standard, we all must understand and adhere to following principles:

Customers

- Identify and understand our customer requirement and ensure we can meet them.
- Develop and implement process that achieve highest customer satisfaction.
- Encourage customer feedback to help us improve performance and service,

Team

- Employ and retain skilled team who share the same values.
- Provide training, safe & clean working environment for all.
- Engage with team to obtain feedback to help identify opportunities for improvement.

Internal System

- Maintain a management system that complies with the standard & legislative requirements.
- Implement continual improvement to achieve customer satisfaction and business goals.
- Create practices to involve relevant stakeholders to identify risks and opportunities.

Supplier

- Use reliable and competent suppliers who share our commitment to customer satisfaction.
- Work together to achieve mutual business goals.
- Collaborate & enhance effectiveness across quality, safety & environmental aspects.

We will establish and review our quality objectives and review the effectiveness of our Integrated Management System (IMS) for quality, safety & environmental aspects through an annual review supported by audits of our System.

Framework for setting quality objectives

Turret Engineering Pty Ltd is committed to establishing and reviewing quality objectives that align with our strategic direction and support continual improvement. Our framework for setting these objectives is as follows:

1. **Alignment with Strategic Goals:** Objectives support our overall goals of customer satisfaction, operational efficiency, and product quality.
2. **Measurable Targets:** We set specific and measurable targets, ensuring progress can be tracked and improvements can be made.

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3. **Stakeholder Feedback:** Feedback from customers, employees, and suppliers is used to set objectives that reflect real needs and opportunities for improvement.
4. **Continuous Improvement:** Objectives are designed to promote ongoing improvement in all aspects of our business in align with the integrated (quality) management system.
5. **Risk and Opportunity Identification:** We consider risks and opportunities when establishing objectives to ensure long-term success.
6. **Regular Review:** Objectives are regularly reviewed and adjusted based on performance data, audits, and business needs.



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Company Policy

CREDIT & VENDOR MANAGEMENT ACCOUNTS PAYABLE & RECEIVABLE POLICY

In recognition of nature of clients and vendors the policy on accounts payable & receivable is drafted to facilitate manage operational effectiveness and mitigate credit risk.

Accordingly, Responsible Manager is permitted to:

- Maintain basic and effective Credit Form & Approval for large clients.
- Discretion to approve credit for existing clients & clients procuring Turrets 1m and smaller.
- Seek deposit payments for special orders or buy-in or fabricated specials.
- Payment before delivery for exports
- Approve consignment stock as per strategy for resellers with contract.
- Approve payments for vendors.
- Issue Purchase Orders, alternate supply options and qualify vendors and buyers according to risk, operational needs, and payment terms etc.

All accounts payable & receivable reports are communicated, and approval process discussed between:

- Responsible Manager
- Accounts Team
- Managing Director

A handwritten signature in blue ink, appearing to read "Rob Hair".

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PROCUREMENT & SUPPLY CHAIN POLICY

Considering our Patented Product Range, Risk Mitigation and Application, the Responsible Manager is permitted to undertake or consider:

- Forecast of sales based on Open Quotes, seasonal demands, project work.
- Potential interruption due to stockouts, pandemic, vendor issues etc.
- Sales & Marketing Plan & Strategy
- Aspects relating to availability of staff, contractors, and team members.
- Shut down and impact of extenuating circumstances on skilled personnel & labour.
- Economies of scale in procurement
- Vendor management & issues

In consultation undertake:

- Production forecast & schedule
- Release advance Purchase Orders
- Manage stock range and options as required.



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Company Policy

ACCESS TO SITE & PERSONAL PROTECTIVE EQUIPMENT (PPE)

All Visitors (people other than employees) must report to office first.

Considering risk, operational needs, and handling of products; our Site Access & PPE policy includes:

Office Areas:

If visiting office area then a footwear that is safe to use in office areas including but not limited to prevent slip, trip and fall is required.

Warehouse

While receiving and loading goods our PPE includes:

- **Safety Shoes** - Safety shoes as a minimum with steel cap and may include safety boots.
- **High Visibility** - Clothing (High Vis) and may include reflective strips but not mandated.
- **Safety Glass** - During work and in operational areas
- **Gloves** - while handling sharp objects tools etc.

In active product assembly & work area

PPE includes the following where required to undertake specific work including grinding, poly welding, router, work with tools etc.

- **Safety Shoes** - Safety shoes as a minimum with steel cap and may include safety boots.
- **High Visibility** - Clothing (High Vis) and may include reflective strips but not mandated.
- **Safety Glass** - During work and in operational areas
- **Face Shield** - During designated work practices
- **Gloves** - while handling sharp objects tools etc.
- **Mask** - during work undertaken that may require mask.
- **Earplugs** - during activities that produce loud noise like grinding, drilling, router etc.

Our policy doesn't mandate long sleeves, long pants, or helmet. However, where risk is introduced through non-regular work we will assess and may implement additional controls as required.

All visitors to operational areas stay on designated walkways and must be accompanied by our team member.

A handwritten signature in black ink, appearing to read "Rob Hair", written over a light blue horizontal line.

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OTHER POLICIES AND ADDENDUM

Considering operational needs, risk, and continuous improvement as required to mitigate risk, we will implement the following but not limited to:

1. Electrical Testing & Tagging of all electrical items including personal items used at our site.
2. Isolation of equipment and prevent “live working” on risk-based evaluation of each task.
3. Supply Chain & Procurement from approved vendors for critical items & generic items procured from vendors based on availability, logistics, cost & operational effectiveness etc.
3. Load Restraint on all goods “in and out” of site to ensure safety in aspects of our operations.
4. Registration & Insurances for Motor Vehicles
5. Cleanup example “Oil leakages and aspects impacting the environment”.
6. Additional PPE & Permits based on task performed – example Working at height, hot work etc.
7. Request signing of “Confidentiality Agreement” due to Trademark & Intellectual Property aspects of our product & services.
8. Comply & undertake change management as per our procedures where changes are required or undertaken as these changes may add or shift risk profile of our operations.
9. Undertake washing | quarantine | fumigation | of products due to export & import requirements.
10. Testing, tagging and validating safety equipment:
 - Slings
 - Chains
 - Fire Extinguishers
 - Any other equipment as required.



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Company Policy

COMMUNICATION POLICY

1. Purpose and Scope

This communication policy is designed to ensure clear, consistent, and effective communication within our organisation and with external stakeholders. It applies to all employees, contractors, and representatives of the organisation.

2. Objectives

- Promote transparency, collaboration, and respect in all communications.
- Ensure timely and accurate information sharing.
- Uphold the organization's values in all internal and external communications.

3. Communication Channels

Internal Communication:

- **Email:** Primary formal communication channel for team updates, instructions, and important information.
- **Instant Messaging (e.g., WhatsApp, Microsoft Teams):** For quick, informal communication and collaborative efforts.
- **Meetings:** Used for discussions that require in-depth collaboration and decision-making (in-person or virtual).
- **Server/Shared Platforms:** For documentation, policies, and shared resources.

External Communication:

- **Email:** The primary method for formal communication with clients, partners, and stakeholders.
- **Phone/Video Calls:** For urgent matters or discussions requiring immediate responses.
- **Social media:** To engage with the public and promote the organization, adhering to the social media policy.
- **Official Letters:** For formal agreements, contracts, or legally binding communications.

4. Guidelines for Effective Communication

- **Clarity:** Ensure all communication is clear, concise, and free of jargon.
- **Respect:** Maintain professionalism, respect, and courtesy in all interactions, regardless of the medium.
- **Confidentiality:** Sensitive or confidential information must be communicated securely and only to authorized individuals.
- **Timeliness:** Respond to communications within 24 hours on working days. For urgent matters, respond as soon as possible.
- **Documentation:** Important decisions or agreements should be documented and shared with relevant stakeholders.

5. Conflict Resolution

Disagreements should be addressed promptly through open dialogue. If resolution cannot be reached, the matter should be escalated to a supervisor or the appropriate department.

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6. Feedback and Continuous Improvement

All employees are encouraged to provide feedback on communication processes. The policy will be reviewed annually to ensure it meets organizational needs and reflects best practices.

7. Communication channels

All external communication to Government Agencies | Media | Commercial Sensitive matters MUST be directed through Business Unit Manager & Director as per RACI Matrix.

8. Non-Compliance

Failure to comply with this policy may result in disciplinary action, including but not limited to verbal or written warnings, suspension, or termination, depending on the severity of the breach.

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Company Policy

PRIVACY POLICY

Please read & understand this Privacy Policy.

This Privacy Policy describes how **Turret Engineering Pty Ltd** (the "Web Site", "we", "us", or "our") collects, uses, and discloses your personal information when you visit, use our services, or make a contact or purchase from www.turrets.com.au or www.turrets.au or any of our associated web (the "Web Site") or our social media page or otherwise communicate with us (collectively, the "Services"). For the purposes of this Privacy Policy, words such as "you" and "your" means you as the user of the services or a visitor of our website, social media pages or any another individual whose information collected according to this Privacy Policy. By using and accessing our services, web & social media, you agree to the collection, use, and disclosure of your information as described in this policy.

Please read, understand and continue to review changes and agree to our terms of service and policies prior to accessing and using any of our services.

Changes:

The policy may be updated from time to time to reflect changes, including but not limited to legislative, legal, procedural, operational, or other relevant developments.

What do we Collect:

Personal information, refers to information that identifies, relates to, describes or can be associated with you, where applicable.

- Your name, address, phone number, email.
- Account information such as username, password, security questions.
- Shopping items including items in shopping cart, preferences, choices etc.
- Payment method and details

Some features of the Services may require you to provide certain information about yourself directly to us. You have the option to withhold this information; however, doing so may limit your ability to use or access these features.

How we collect and use personal information:

To provide our Services, we collect personal information about you from a variety of sources both currently and over the duration of our interaction with you, as detailed below. The specific information we gather, and use depends on your mode of interaction with us. In addition to the specific purposes outlined below, we may use the information we collect about you to:

- Communicate
- Deliver the Services
- Comply with applicable legal obligations
- Enforce our terms of service
- Protect or defend the Services, our rights, and the rights of our users or others

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We automatically collect certain information about your interactions with the Services ("Usage Data"). This may be done using cookies and similar technologies ("Cookies"). Usage Data may include details about how you access and use our site and account, such as device information, browser details, network connection data, IP address, and other relevant information about your interaction with us and services. We may obtain information about you from third parties, including vendors and service providers who collect information on our behalf, such as: Companies that support our web, social media, payment portal etc.

Why do we use your personal information:

We use your personal information for the purpose of:

- **Marketing and Advertising:** send marketing, advertising and promotional material by email, text, WhatsApp message or postal mail (all electronic and addressed communication)
- **Deliver products & services:** identify personal choices, create account, processing payment, logistics and distribution
- **Support:** respond to queries, customer support, shopping experience etc.

Information Security:

The security of your information is important to us. While we strive to collect and store sensitive information using secure systems, we request that you do not share your username, password, or other access details with anyone. If you suspect any unauthorized access to your account or believe it has been compromised, please notify us immediately. No security measures are completely safe, and we cannot guarantee absolute security. Additionally, information you send to us may not be secure during transmission. We advise against using unsecured channels to communicate sensitive or confidential information.

Links to Third Party Websites:

Our Site may contain links to third-party websites or platforms. If you follow these links, review their privacy and security policies. We are not responsible for the privacy, security, or accuracy of these sites. Information you share on public or third-party platforms may be visible to others and used without limitation. The inclusion of such links does not imply our endorsement, unless stated otherwise.

When do we disclose personal information

Under certain circumstances, we may share your personal information with third parties for legitimate purposes, in accordance with this Privacy Policy. These circumstances may include:

- **Vendors or other parties** who provide or deliver services such as information technology, processing payment, management of data analytics, customer service, online services, cloud storage, logistics, order completion, experience and shipping
- **Legal & Government** where legislatively required to do so
- **Team members** for delivery of services, value and experience

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Other Privacy Matters:

Please be aware that no security measures are perfect or free from risk, and we cannot guarantee "absolute security" of information collected, stored and used. In addition, any information you send to us may not be secure while in transit. We recommend that you do not use unsecure channels to communicate sensitive or confidential information to us. How long we retain your personal information depends on different factors, such as whether we need the information to maintain your account, to provide services, comply with legal obligations, resolve disputes or enforce other applicable contracts and policies.

Option to opt out:

You have the right to opt out of promotional campaigns, advertising and accessing our services as per applicable privacy laws. In addition to opt out or unsubscribing, you may also email us to confirm your choice to opt out. However, if you choose to opt out, we may still send you non-promotional emails, relevant to your orders, delivery or account.

Contact information & complaints:

Should you wish to opt out or send an enquiry please email: solutions@turrets.com.au

We take our responsibility to communicate with the utmost respect and care. If we do not respond to your request within two weeks, please feel free to escalate your concerns by emailing us or contact us on phone or physical location. Alternatively, you may also escalate your complaint with your local data protection authority if you choose to do so.

Thank you for your understanding and continued support.

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Rob Hair
Managing Director
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