

▲ SPEAKING UP POLICY

Approved by the Board July 2011



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What is the purpose of the Speaking Up policy?

Boom Logistics Limited (BOOM) is committed to ensuring that Directors, Executives, employees and contractors comply with the law, BOOM Charters and Policies and BOOM's ethical standards, as detailed in the company's Code of Conduct and Fraud policies. BOOM is committed to detecting and preventing illegal and other undesirable conduct and therefore must provide a mechanism whereby employees and others can report their concerns freely and without fear of repercussion.

This policy details this mechanism, and encourages the reporting of such conduct.

The Company will not tolerate harassment or victimisation and will take action to protect those who raise a concern in good faith.

Who must comply with this policy?

This policy applies to all Directors, Executives and all employees of BOOM.

What is the policy?

The Speaking Up Policy has been developed to ensure employees can raise genuine concerns regarding actual or suspected breaches of our ethical and legal standards (including suspected instances of fraud or corruption) without fear of reprisal or feeling threatened by doing so. This Policy aims to:

- Encourage people to report an issue if they genuinely believe someone has breached the BOOM Company Policies and Charters, Code of Conduct, the law or has been involved in fraud or corruption;
- Outline the procedure that will be followed to deal with all reported misconduct or unethical behaviour; and
- Assist in ensuring that serious misconduct or unethical behaviour is identified and dealt with appropriately and in a timely manner.

This Policy should be read in conjunction with BOOM's Code of Conduct and Fraud Policies.

What are the key obligations for all employees under this policy?

All employees are encouraged to report any matters or behaviours that they genuinely believe breach BOOM's Company Charter and Policies, Ethical Standards or the law or is believed to be fraudulent or corrupt behaviour. Appendix A sets out a list of matters which should be reported where there is actual or genuinely suspected behaviours.

Who can employees talk to?

If you believe someone is breaching BOOM's Policies and Charters, Code of Conduct, or the law or has been involved in fraudulent or corrupt behaviour, then you should:

- Take the matter up with your Depot Manager or General Manager; or
- Report the matter to the General Manager, Human Resources or the Company Secretary on 03 9207 2500.

Reports can be made in person, in writing or by email. The confidentiality of those reporting incidents, including internal fraud, will be respected.

What happens when an employee reports the matter?

BOOM will investigate all reported concerns appropriately and will, where appropriate, provide feedback regarding the outcome of the investigation. BOOM will take the necessary course of action in response to the outcome of the investigation.

BOOM may seek external expertise in the investigation process to ensure appropriate processes and reporting are adopted and outcomes are followed.

What happens to the employee speaking up?

An employee will not be discriminated against or disadvantaged when speaking up in accordance with this Policy.

BOOM will take all reasonable steps to ensure that adequate and appropriate support and protection is provided for those who speak up.

Speaking up is not about raising grievances or making false reports against employees. It is about reporting alleged breaches. Where it is determined the employee speaking up has not acted in good faith or has made false reports, then disciplinary action will be taken.

Dealing with conflicts of interest

A conflict of interest may arise when personal, financial, and business or other interests might affect, or be seen to affect, the way an employee performs their duties. BOOM recognises the impact that conflicts of interest can have and therefore intends to be transparent with all transactions that occur.

BOOM guidelines are as follows:

- Employees should avoid participating in any business activity outside of BOOM that may conflict with their duties within the Company;
- Employees should not accept gifts which could be seen as a past, present or future conflict of interest in carrying out their duties; and
- If an employee is faced with a possible conflict of interest, the conflict should be declared, the circumstances discussed with their General Manager or other senior executive, and action taken to avoid any real or perceived conflict of interest.

Who can provide me with more information on the policy?

If you have any questions about this policy or concerns about possible breaches or any other queries regarding this policy, please contact the General Manager, Human Resources or the Company Secretary.

This policy is consistent with the requirements of the Corporations Act 2001. Employees can obtain more information in this regard at:

<http://www.asic.gov.au/>

▲ APPENDIX 1

Examples of matters which should be reported under the Speaking Up Policy

All employees are encouraged to report any matters or behaviours that they genuinely believe breach BOOM's Company Charter and Policies, Ethical Standards or the law or is believed to be fraudulent or corrupt behaviour.

The following is a list of matters which should be reported where there is actual or genuinely suspected behaviours:

- Conduct which is illegal or a breach of the law, including the Corporations Law, Trade Practices Law and Accounting standards
- Breach of BOOM Policies and Charters
- Corrupt activities
- Theft, fraud or misappropriation of assets
- Bullying or harassment
- Abuse of authority
- Purposely damaging company plant and equipment
- Breach of BOOM's Health, Safety and Environment Policies
- Breach of BOOM's Securities Trading Policy.

For more examples of fraud please refer to the "*Fraud Policy*".