

▲ SPEAKING UP POLICY

Approved by the Board 17/12/19



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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, employees (whether permanent, part-time, fixed term, temporary or casual), contractors and their employees, consultants and secondees 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.

This Policy will be periodically reviewed to make sure that it is operating effectively.

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 Immediate Manager ; or
- Report the matter to the General Manager or the Company Secretary on 03 9207 2507.

- You may at any stage skip a person in the chain outlined above if that person is the subject of the report or if you have another reason to believe that the person is not likely to deal with the report properly.

Reports can be made in person, in writing or by email. The confidentiality of those reporting incidents, including internal fraud, will be protected through measures that focus on confidentiality and discouraging victimisation or reprisals.

While reports can be made anonymously if preferred, this may affect the ability to investigate the matter properly and to communicate with you about your report.

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.

Anyone who discloses the identity of those who speak up who wishes to remain anonymous (or information that could disclose the identity) faces a civil or criminal penalty.

What happens to the employee speaking up?

BOOM will ensure that adequate and appropriate support and protection is provided for those who speak up including protecting identity and files relating to the report and making sure information received is held in strict confidence unless consent is given or required by law.

Boom will take whatever action is possible consistently with this policy to make sure you are not personally disadvantaged or victimised for making your report, whether by dismissal, demotion, harm, damage, any form of harassment, discrimination or any form of current or future bias.

If you claim to have been the subject of any such action as a consequence of making your report, and the matter cannot be resolved with you by management, the matter will be referred to the Company Secretary.

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 did not have reasonable grounds to suspect misconduct or contravention or an improper state of affairs or circumstances or has made false reports, then disciplinary action will be taken.

What happens to employees who are mentioned in a report?

BOOM will ensure that any employees of the company mentioned in protected disclosures, or to whom such disclosures relate, are treated fairly. BOOM will ensure all disclosures are investigated appropriately and any information received is held in strict confidence unless consent is given or as required by law.

When this policy does not apply?

This policy does not apply to instances where an employee is undergoing a performance improvement process where reasonable management action is carried out in a reasonable manner. Examples of reasonable management action are listed in Appendix 1. This policy also does not apply to employment

disputes or personal work related grievances (including a conflict with another employee or a decision about your employment).

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 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 conduct and activities
- Theft, fraud or misappropriation of assets
- Unfair or unethical dealing with a customer
- Danger to the public or the financial system
- Misconduct, or an improper state of affairs or circumstances
- 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".

What is Reasonable Management Action?

The following are examples of what may constitute management action:

- Performance appraisals
- Ongoing meetings to address underperformance
- Counselling or disciplining a worker for misconduct
- Modifying a worker's duties including by transferring or re-deploying the worker
- Investigating alleged misconduct
- Denying a worker a benefit in relation to their employment, or
- Refusing an employee permission to return to work due to a medical condition