

▲ CODE OF CONDUCT

The ethical framework reflecting
the shared values of the Boom
Logistics Group



▲ EXECUTIVE SUMMARY

This Policy provides guidance as to the appropriate conduct and behaviour of Boom Logistics' directors, officers, employees and contractors in performing their everyday roles.

This Code of Conduct should be considered in conjunction with Boom's Securities trading, Fraud and Speaking Up policies.

Compliance with this policy is mandatory.

Failure to comply with this policy may lead to disciplinary action and/or summary termination of your appointment or employment.

▲ OVERVIEW

The purpose of the Code of Conduct is to guide and enhance the conduct and behaviour of Boom Logistics' directors, officers, employees and contractors in performing their everyday roles. The code encourages and fosters a culture of integrity, responsibility and accountability which will strengthen Boom Logistics' reputation as an employer, a business partner to our customers and suppliers, and a good corporate citizen.

This document provides a framework for all Boom employees under which to operate, but is not intended to be a detailed policy statement. Ultimately it will be Boom's employees who, with a shared understanding and passion for Boom's goals and values, will continue to develop a winning organisational culture.

This Code of Conduct should be considered in conjunction with Boom's Fraud & Speaking Up policies. Failure to comply with this policy may lead to disciplinary action which may include an individual being reported to external authorities (e.g. the police) and/or summary termination of appointment or employment.

This Code of Conduct must be read in the context of Boom's goals, values and behaviours.

Boom's Goals are ...

- To be the safest and leading lifting solutions company in Australia and equal to the best in the world.
- To be recognised as a top performing company of high standing and integrity delivering superior value for our customers, people and shareholders.
- To be respected by the communities we are part of.

What's important to Boom is ...

- Customer Focus – everything begins with the customer.
- Safety Always – continue our journey towards zero harm.
- Developing Our People – commitment to our future.
- Team Work – working together to achieve our best.

- Innovation – looking for new ways to do things.
- Respect – for each other and all stakeholders.

Boom employee’s key behaviours are ...

- Safety is our priority, leading to Zero Harm.
- Transparency – “No Surprises”.
- A “can do” attitude.
- Individual accountability.
- Get it right first time.
- Make it simple.
- Concise and timely communication.
- Fact and data based decision-making.
- Delivering on commitments (service/customer).
- Respect for Customers, People, Community and Environment.

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1. Safety and the environment

Boom employees value safety above all else. Safety should never be compromised to meet operational targets or profit driven objectives. Boom management and employees are committed to achieving zero harm to employees, third party personnel and the environment.

We must work safely and apply industry best practice to the health, safety and wellbeing of our employees, customers, suppliers and the communities in which we operate.

2. People

Boom values the contributions from every member of its diverse workforce. Our different cultures, backgrounds and experience allow us to collaborate and reach innovative solutions towards achieving our goals. We value tolerance within this diversity.

We will show courtesy and responsiveness in dealing with others and demonstrate fairness in supervision and dealing with other staff by valuing colleagues and their personal commitment to meet shared objectives.

We will treat everyone fairly irrespective of gender, race, sexual orientation, age disability, religion or ethnic origin.

Employment and advancement must be based on merit.

We will encourage and seek out cooperation and engage in rational debate to explore alternative points of view.

We will avoid behavior that might reasonably be perceived as harassment, bullying or intimidation.

To ensure full and frank communication, we will listen with respect and understanding.

3. Integrity and Respect

We will not make statements, promises or commitments that we do not believe to be true or which we or Boom Logistics do not intend, or are unable, to honour.

We compete fairly in the markets in which we operate.

We will at all times, deal fairly and in good faith with Boom Logistics' customers, suppliers and competitors, as well as with work colleagues and all other parties.

We will aim to bring long-term benefits to Boom, rather than short-term advantage for individuals at the expense of the organisation's and shareholders' long-term interests.

We will protect Boom Logistics' reputation and assets and not use them for personal gain.

Corrupt or fraudulent practices are unacceptable. No bribes or similar payments will be made to, or accepted from, any party.

All commercial transactions will be properly and accurately recorded.

Boom Logistics does not make political donations.

Abiding by Law

All business should be conducted in accordance with the laws and regulations of the region in which the business is located.

Directors, employees and contractors will:

- not take any action, nor allow any omission, that will breach any law or regulation (including insider trading laws – refer Boom’s Securities Trading Policy);
- immediately report knowledge of any actual or potential breaches of the law or this Code to their manager (and/or the Company Secretary) so that appropriate action can be taken;
- understand that if they breach any law or provision of this Code, the breach will be investigated, which could result in disciplinary action, including termination of employment. Breaches of law will be reported to the relevant external authorised (e.g. the police) where appropriate; and
- take all required steps to ensure that there is no human trafficking, slavery or child labour in Boom’s supply chains or in any part of the business and will not directly or indirectly engage in any act that will breach modern slavery laws (including but not limited to human trafficking, slavery and child labour).

Payment, Gifts or Entertainment

We will not solicit, accept or offer any gifts or entertainment in breach of this Code. This includes the following:

- not using your employment status or position at Boom Logistics to seek personal gain from those doing business or seeking to do business with Boom Logistics, or from any other person or company;
- not accepting any personal cash payments, direct deposits or cheques;
- not accepting or providing any gifts or entertainment if such gifts or entertainment are provided in return for any consideration; and
- not offering, promising or providing a bribe, in any form, to any person, either directly or indirectly, and not accepting a bribe from any person.

Business & Financial Records

We will ensure the accuracy of all Company business and financial records to ensure transparency in all business dealings. These include not only financial accounts, but other records such as safety reports, time records, expense reports and submissions such as benefits claim forms and resumes.

We will never falsify any document, or distort the true nature of any transaction.

Gross Misconduct Policy

Gross misconduct includes, but is not limited to, the following offences if performed on Company premises or while engaging in Company business whether during working hours or not. This list is offered as a guideline only and does not intend to cover every behaviour or conduct that would warrant immediate termination of employment.

- Behaviour that endangers the safety, health or life of another person or poses any threat to employees.
- The possession or use of firearms or any other weapons.
- The unauthorised use or excessive consumption of alcohol at work or at a Company sponsored event, including business dinners after normal work hours.
- The possession, transfer, purchase or sale of any controlled substance, or use of such a substance, unless such substance was obtained under a valid medical prescription and used in the prescribed dosage. Employees must notify their manager if they are using prescription medication that may impact performance or where health issues may require emergency medical treatment.
- The commission of fraud (refer Boom's Fraud Policy), theft, embezzlement, larceny or any other indictable offence.
- Falsification of Company records or other documents such as time cards including altering or falsifying in connection with any Company benefit.
- The transfer of a Company badge or identification, credit card or phone card to another person for unauthorised use.
- The unauthorised disclosure of or access to confidential information, including that contained in the Company's computer systems, unless where required by law.
- The destruction or vandalism of Company property.
- The disregard of an express order or direction given by a supervisor or manager within the scope of his or her authorised powers or duties, or unwanted demonstration of disrespect to a supervisor, manager, or peer in situations where professional propriety is reasonably expected.
- An employee who is convicted of any crime on or after their hire date, the knowledge of which would be disruptive to the productivity of the workplace, or any employee who is convicted of a work-related felony or misdemeanor.
- The violation of any Human Resources, Information Security and Financial Policies and Standards.

Gross misconduct will result in disciplinary action and may result in the termination of appointment or employment.

4. Open and continuous communication

Boom's values and behaviours around transparency, accountability, integrity and teamwork are all dependant on open and continuous communication. Boom's obligations under ASX listing rules also guide our approach to business communication and disclosure.

When any serious incident or event in the business occurs, it must reported through appropriate channels. As a minimum this must be to your manager, who in turn will escalate as required.

The most serious incident or event would involve a safety alert or injury, but other events may include significant business disruption, legal or regulatory breaches, information impacting financial performance or breaches of this Code.

Boom employees can feel safe that they can communicate these messages without fear of retribution, particularly where the message is not a good one. This environment of trust is critical.

5. Conflicts of Interest

The term "conflicts of interest" refers to any situation or action that prevents employees from acting objectively with regard to the Company's best interests. Any external or internal relationship which could potentially have a negative impact on the Company may also constitute a conflict of interest.

Situations and activities which could constitute a conflict of interest include, but are not limited to:

- conducting personal business during normal working hours;
- using Company property or resources for personal purposes, including use of Company owned facilities or assets;
- incurring excessive or unnecessary business travel or entertainment expense;
- engaging in employment outside of the Company, including self-employment, unless approved in advance by an Executive of the Company;
- breach of the Company's confidentiality agreements, including the confidentiality terms and conditions that form part of Boom's standard employment contracts;
- an employment action that would create either a direct or indirect supervisor/subordinate or internal/external supplier relationship with an employee and his or her relative, domestic partner or other person with whom the employee has a significant relationship;
- hiring, promoting, transferring or giving work assignments to any individual who is a relative, domestic partner or other person with whom the employee has a significant relationship;
- employees in the same Business Unit who marry, become domestic partners or become involved in a significant relationship, where there may be a conflict due to a direct report relationship or where they occupy roles where a segregation of duties is required;
- engaging in direct or beneficial ownership of an interest in, or securities of, a supplier, contractor or competitor of the Company;
- conducting business with the Company as a vendor or independent contractor; and
- using confidential or insider information for personal profit or gain.

This list is offered as a guideline to describe the types of activities that might cause a conflict of interest. If in doubt, seek advice from the Company Secretary or General Counsel.

6. Confidentiality

Confidential information includes all information relating to the business and its clients or operational interests, or methodologies and processes, any financial information, and anything else the employer notifies the employee as being confidential.

All information received and acquired during the course of employment is confidential and the property of the Company and its clients. Unless the law dictates otherwise, during and after employment with the Company, employees must take all reasonable steps to keep confidential all they were privy to during their employment.