
Code of Conduct

10-2022

Introduction

This Code of Conduct is a guide to the ethical standards we value in Boomerang Logistic Group OÜ and its subsidiaries (hereinafter collectively referred to as Boomerang). It outlines our business, social, and environmental responsibilities, and clearly sets out the ethical standards we expect our people and our partners to fulfill.

Following these standards are expected from all our employees working in Boomerang companies, and also from our suppliers and customers. Our suppliers must act in full compliance with local applicable laws and this Code of Conduct.

The Code of Conduct may have requirements that are stricter than those provided for in local laws and then this Code of Conduct must prevail. But in any case of conflict between the applicable provisions of the law and the instructions of Code of Conduct, the law's provisions must be upheld. If any problems or incompliances should arise with the principles of Code of Conduct, supplier is expected to notify Boomerang immediately.

To meet these standards, we all need to take personal responsibility for acting in an ethical and responsible manner with integrity and by understanding what this involves and why it is so important. The Code of Conduct is designed to provide clear and easily implementable rules providing guidance in the behavior that is expected of us, especially in challenging situations or where difficult decisions are involved.

Provisions of the Code of Conduct



This Code of Conduct is based on principles of human rights, anti-discrimination, honesty, credibility, and responsibility, on the norms of business ethics and also on relevant legislation, regulations and directives.



EMPLOYMENT AT BOOMERANG IS FREELY CHOSEN

Boomerang does not use and does not accept using forced, bonded, nor compulsory labor. Our people are free to terminate their employment at Boomerang after providing a reasonable notice subject to applicable law. Nobody is forced to work against their free will.

HIRING MINORS

Boomerang does not hire or does not approve the employment of children under the age of 15. Boomerang may, in accordance with applicable laws and if decided so by Boomerang's management, hire children aged 15-17, provided that it is allowed by local laws and legal requirements are fulfilled.

FREEDOM OF ASSOCIATION

Boomerang respects the right of all employees to freely join together with others in associations. Employees shall not be subjected to discrimination on the basis of union membership or active participation in other legal activities.

BUSINESS ETHICS

Boomerang companies conduct their activities transparently, fairly, and ethically and according to the law. The same we expect from all our suppliers and clients.

We do not tolerate bribes or other type of illegal payments. Advertising, sales, and marketing practices are conducted in accordance with applicable law.

We place importance on creating and maintaining business relationships with suppliers who are strict, about fulfilling the law's provisions regarding the rights of employees, as well as regarding health and safety, protecting the environment, and more.

We operate on the basis of trust and agreements, we do what we have promised to and expect the same from others.

We behave fairly, respectfully, and justly with our employees, clients and suppliers and we truly believe one reason for our success and growth is based on our high ethics.

EQUAL OPPORTUNITIES AND DIVERSITY

Boomerang does not tolerate discrimination, humiliation, harassment, violence or insults against employees. We treat everyone with dignity and respect and expect the same from our suppliers and clients. Everyone shall be treated equally, respectfully and fairly, and no discrimination shall take place based on race, color, religious beliefs, gender, sexual orientation, national, ethnic or social origin, family or marital status, age, disability, medical condition, genetic information or union membership.

Every employee shall have possibility for growth and development based on their performance regardless of their gender, religious beliefs or cultural background.

We have worked out processes and tools for our employees to report grievances and other workplace complaints. Our whistleblowing tool is available not only for our employees, but for everyone in contact with Boomerang, to report on suspicion of violation or misconduct.

REMUNERATION AND WORKING CONDITIONS

People should be hired with personal contracts and all arrangements should be done in accordance with the provisions of applicable law.

Wages and benefits paid to employees shall be clear and transparent and shall meet, at minimum, local legal standards. Payouts shall correspond to the terms agreed in the employment contracts.

Agency workers shall receive the same remuneration and shall have the same rights and benefits as Boomerang's own employees.

Overtime shall be voluntary and must not exceed the statutory limit of hours per week provided for in local laws and must be compensated at least in accordance with statutory requirements.

Any deductions from wages not provided for by local law are not permitted without the express permission of the individual concerned.

Decisions about hiring, remuneration, benefits, work assignments, discipline and termination must be based on the ability to perform a job and not on personal specialties or beliefs. All disciplinary measures should be recorded.

OCCUPATIONAL HEALTH AND SAFETY

Boomerang is committed to providing a safe work environment and strictly follows all relevant legal provisions in order to protect the health and safety of our employees, clients and suppliers.

It is important for us to take suitable measures for the prevention of occupational illnesses and work-related accidents and to provide employees with a safe and healthy workplace.

Everyone shall strictly follow relevant safety rules and instructions that are designed to safeguard everybody's wellbeing and health.

ENVIRONMENTAL PROTECTION

Protecting our environment is part of our corporate strategy. Boomerang complies with relevant and applicable environmental protection laws, regulations and standards. We make efforts to protect the environment and encourage our suppliers and clients to do the same.

For several years already we have been efficiently minimizing our carbon emissions footprint with:

- green energy usage;
- compensation of CO2 emissions from its business operations and ferry cargo Tallinn-Stockholm-Tallinn & Tallinn-Helsinki-Tallinn routes;
- offering Carbon Neutral parcel shipment alternative for international cross border segment;
- waste sorting to ensure optimum level of recycling from operations;
- minimizing the usage of paper and other consumables both in office and in operations.

CONTINUOUS IMPROVEMENT

The Code of Conduct represents a set of instructions that apply both, to Boomerang and its employees.

Boomerang also expects that suppliers will continually improve their practices according to the highest standards of business ethics and comply with our Code of Conduct.

Boomerang requires that all persons governed by this Code of Conduct study the instructions and comply with these provisions.

