



Privacy Policy

Silk Logistics Holdings Limited
ACN 165 867 372

Version: 2:0
21 August 2023

Document History

Version	Summary of Amendments	Approved by	Approval date
1.0	Initial Code of Conduct	Board of Directors	2 June 2021
2.0	Routine review and in light of the recent amendments to the Privacy Legislation Amendments which came into effect on 12 Dec 2022.	Board of Directors	21 August 2023

Other Policy Details

Key Information	Details
Approval Body	Silk Logistics Holdings Limited Board of Directors
Key Stakeholders	Silk Logistics Holdings Limited Board of Directors Executive Leadership Team
Responsibility for Implementation	Chief Executive Officer General Counsel
Policy Custodian	General Counsel
Next Review Date	August 2025
Reference Policies	Statement of Values Continuous Disclosure Policy Securities Trading Policy Anti-Bribery and Corruption Policy Whistleblower Policy

Legislative and Regulatory Framework

Authority	Law, Resolution or Regulation
Australian Government	Corporations Act 2001 (Cth) (" Corporations Act ")
	Privacy Act 1988 (Cth), Australian Privacy Principles (" Privacy Act ")
ASX Corporate Governance Council	ASX Corporate Governance Principles and Recommendation (2019) (" ASX Principles ")

1. Introduction

- 1.1 Silk Logistics Holdings Limited (the “**Company**”) and its subsidiary companies (collectively referred to as the “**Group**”, “**we**”, “**our**”, “**us**”) recognises the importance of privacy and is committed to protecting your privacy when handling your personal information.
- 1.2 This Privacy Policy (the “**Policy**”) sets out how the Group will collect, hold, use, disclose, protect and otherwise handle your personal information in accordance with the Australian Privacy Principles contained in the Privacy Act.

2. What is personal information?

- 2.1 Personal information is information or an opinion about you from which you can be reasonably identified;
- a) whether the information or opinion is true or not; and
 - b) whether the information or opinion is recorded in a material form or not.
- 2.2 Examples of personal information are:
- a) information relating to the race, gender, sex, pregnancy, genetic information, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
 - b) information relating to the education, financial, criminal or employment history of the person;
 - c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - d) the biometric information of the person;
 - e) the views or opinions of another individual about the person; and
 - f) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

3. Why does the Company collect personal information?

- 3.1 The Group collects personal information so that we can carry out our business of providing facilities and services to you, administer your investment in the Company, and comply with our legal obligations.
- 3.2 The Company may collect personal information where you:
- a) contact us, through telephone, video call solutions or through our websites to utilise any of our facilities or services or information;
 - b) deal with us as part of managing our day-to-day business activities;
 - c) are part of us procuring services from you, or your provision of such services on our behalf;
 - d) are a current, former, or potential employee or contractor;
 - e) make an enquiry or complaint to us; or
 - f) the Privacy Laws say we can collect, use, disclose or process that personal information.
- 3.3 If the Company or Group does not collect your personal information, it may not be able to provide you with these services.

4. What personal information does the Group collect?

4.1 Customers

- 4.1.1. In the course of interacting with you or providing you with associated facilities and services the Company and Group may collect and hold the following personal information about you:
- (a) your name;
 - (b) address and other contact details;
 - (c) date of birth;
 - (d) tax file number (**TFN**); and
 - (e) banking details.
- 4.1.2. Generally, the Group will not collect sensitive information about you (such as your race or ethnic origin, political beliefs or religion). If the Group needs sensitive information, it will ask your consent when it collects this information and comply with the Privacy Act.

4.2 Suppliers or Other Third Party

- 4.2.1. We rely on and engage with people every day to operate and deliver our services. In doing so, we collect personal information from you, including but not limited to:
- (a) Actual and prospective suppliers or contractors;
 - (b) Representatives of service providers;
 - (c) Stakeholders; and
 - (d) Job applicants (future employment relationships).
- 4.2.2. The kinds of personal information we collect about you will depend on the circumstances and purposes of collection, but will typically include:
- (a) your name, job title, contact information (phone number, email address and office address)
 - (b) financial information (including credit card details or bank account numbers); or
 - (c) where relevant, information about your employer or an organisation you represent.
- 4.2.3. We collect this information primarily to communicate with you or your organisation or as part of the payment processing procedures.
- 4.2.4. As for job applicants, we can collect information included in your resume, publicly available online profiles, pre-employment tests and / provided through background checks. These may also include opinions from referees and criminal background checks which are obtained with consent.

4.3 Employees

- 4.3.1. The handling of personal information by private sector employers, including us, is exempt from the Privacy Act if the personal information relates directly to an employee record of a current or former employee. This means that we do not need to comply with the Australian Privacy Principles (**APPs**) when it handles current and past employee records.
- 4.3.2. We have an obligation to make and maintain an employee record, in accordance with the Fair Work Act 2009 for each individual employee.
- 4.3.3. We may collect your information, including:
- (a) Your health information;
 - (b) Your postal address and date of birth;
 - (c) Any training records, disciplining, resignation or termination of employment (where applicable);
 - (d) The terms and conditions of your employment including hours of work, salary or wages;
 - (e) Your personal and emergency contact details;
 - (f) Your performance or conduct information;

- (g) Your membership of a professional or trade association or trade union membership;
- (h) records relating to your leave entitlements and leave taken;
- (i) Your taxation, banking or superannuation details;
- (j) Termination of employment records

5. How does the Group collect your personal information?

Collecting information from you

- 5.1 How the Group collects your personal information will largely depend on whose information it is collecting. If it is reasonable and practicable to do so, the Group will collect personal information directly from you.
- 5.2 Depending on how you choose to interact with the Group, the Group may collect your personal information when you contact the Group or our service providers by telephone, by email, through the Group's websites or when you complete a form or document and provide it to the Group.

Collecting information from third parties

- 5.3 The Group may also collect information about you from other people (e.g. a third-party administrator) or independent sources. For example, the Group may collect personal information about you from its services providers, including the Company's share registry (Computershare Investor Services Pty Limited). However, the Group will only do so where it is not reasonable and practicable to collect the information from you directly. Where the Group has collected your information from a third party, such personal information will be held, used and disclosed by the Group in accordance with this Privacy Policy.
- 5.4 When you provide the Group with personal information you consent to the use, disclosure and handling of your personal information in accordance with this Privacy Policy and any subsequent amendments.

Collecting information from visits to the Group's websites

- 5.5 The Company and Group may collect information based on how you use their websites including through 'cookies', web beacons and other similar technologies. Cookies are small text files that websites or apps may place on your computer or device and collect non identified/anonymous information about the users of its website such as the number of visitors, the number of pages viewed and the internet advertisements which bring visitors to the website.
- 5.6 The Group uses cookies to provide you with a more consistent experience across our services and reserves the right to ask advertisers or other partners to serve ads or services to your devices, which may use cookies or similar technologies placed by us or the third party. This information is collected to analyse and improve the Group's websites, its marketing campaigns and to record statistics on web traffic.
- 5.7 No attempt is made by the Group to use this information to personally identify you. We record a variety of information from interactions with our online services including IP address, locations data (where available and not disabled by the user), dates, times, and other user activity. In most cases we will not be able to reasonably identify an individual from the information collected. However, if cookie information is linked with personal information we hold about you as set out above, this cookie information becomes personal information and will be treated in the same manner as the personal information to which it has been linked.
- 5.8 You can remove or reject cookies by adjusting the settings on your web browser.

Unsolicited information

- 5.9 If the Group receives personal information that it has not requested, or it determines that the personal information received is not reasonably necessary to provide its services, the Group will take reasonable steps to de-identify or destroy that personal information.

6. How does the Group hold your personal information?

Storage and security of your personal information

- 6.1 The security of your personal information is of paramount importance to the Group and it takes reasonable steps to protect the personal information it holds about you from misuse, loss, unauthorised access, modification or disclosure.
- 6.2 The Group may store your personal information electronically or in hard copies. The Group has a number of safeguards in place to protect the personal information we hold, including password protected databases, employee training and system firewalls. The Group maintains password security and restricted access to all electronic documents containing personal information and stores hard copy documents in secured locations.
- 6.3 The Group will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for the purpose for which the information was used or disclosed.

7. How does the Group use your personal information?

- 7.1 The Group may hold, use or disclose your personal information so that it can administer your investment in the Company and provide facilities and services that you request.
- 7.2 The Group may also collect, hold, use or disclose your personal information to:
- (a) consider any concern or complaint that you raise against the Group or to manage any legal action between you and the Group;
 - (b) prevent or investigate any actual or suspected fraud, unlawful activity or misconduct;
 - (c) identify you or establish your tax status under any Australian or foreign legislation; or
 - (d) comply with any relevant laws, regulations, codes or practice and court orders.

8. How is personal information disclosed to others?

- 8.1 The Group does not sell, rent or trade personal information to, or with, third parties.
- 8.2 The Group's websites may contain links to other websites. The Group does not share your personal information with those websites and it is not responsible for their privacy practices.
- 8.3 In some circumstances your personal information may be disclosed to service providers that perform a range of services on behalf of the Group including:
- (a) mailing houses and printing companies;
 - (b) auditors and solicitors;
 - (c) registry providers;
 - (d) insurers;
 - (e) information technology vendors; and
 - (f) other consultants.

- 8.4 Personal information may be disclosed to third parties in Australia and overseas, these includes;
- (a) Other subsidiaries within the Group;
 - (b) Service providers; and
 - (c) Partner organisations.
- 8.5 If the Group transmits your personal information over the internet (for example to third parties who hold data outside Australia) we will take reasonable steps to maintain the security of any personal information to prevent misuse and unauthorised access. Despite these protection mechanisms, you should be aware there are inherent risks associated with the transmission of data over the internet and we cannot guarantee any transmission will be completely secure.
- 8.6 Where the Group discloses your personal information to its service providers, it will take steps to ensure that they are authorised to only use personal information in order to perform the functions required by the Group and in accordance with the Privacy Act.
- 8.7 The Group may also disclose your personal information to law enforcement agencies, courts or government agencies where required to comply with specific legal requirements. In particular, the Corporation Act requires certain information about you to be included in the Company's registers which are able to be accessed by the public.

9. Does the Company use your personal information for marketing?

- 10.1 The Company will use your personal information to offer you facilities and services that we believe may interest you. We will not do this if you have told us not to.
- 10.2 We will disclose your personal information to companies within the Group so they can market the services to you. We may also disclose your personal information to companies outside Group to assist us to market our services.
- 10.3 If you don't want to receive marketing offers from us, please contact us, using the contact details below.

11. How you may access or correct your personal information

- 11.1 You may contact the Group to request access to the personal information that it holds about you at any time. You may also ask the Group to correct information about you that you may believe is inaccurate, incomplete or out of date.
- 11.2 Please contact the Group using the contact details below if any of the personal information that the Group holds about you is not correct or complete, or if you wish to request access to the personal information which the Group holds about you. The Group will need to verify your identity before giving you access to, or correct, your personal information.
- 11.3 In certain circumstances, the Group may not be able to correct or provide you with access to your personal information. In these circumstances, the Group will write to you to explain and provide the reasons why.

12. How you may complain if you have concerns about how the Group has managed your personal information

- 12.1 If you have a complaint related to how the Group has managed your personal information, please contact the Group using the contact information below. The Group may ask you to place your concerns in writing in order for it to fully understand and investigate the issues you have raised. We will endeavour to respond to your request within 30 days. All such complaints will be handled with the appropriate discretion.

- 12.2 If a complaint remains unresolved, you may access an external dispute resolution service or apply to the Office of the Australian Information Commissioner (**OAIC**) at www.oaic.gov.au to have the complaint heard and determined.
- 12.3 Further information on the Act and the Australian Privacy Principles, can be found at www.privacy.gov.au.

13. How to contact us

- 13.1 If you have any questions about this Privacy Policy, if you wish to complain about how the Group handled personal information about you or if you wish to access or correct your personal information, please contact the Company Secretary on:

Tel: +61 3 9692 7222
Mail: Silk Logistics Holdings Limited
Level 4, 100 Albert Road
South Melbourne
Victoria, 3205

14. Policy review and amendments

- 14.1 The Policy will be reviewed **once every 2 years** or as often as necessary to ensure it remains effective and relevant.
- 14.2 The Board is responsible for approving the Policy and may make changes from time to time by resolution.
- 14.3 The Policy will be available on the Company's website within a reasonable time after any such updates or amendments have been approved.