

# Modern Slavery Statement 1 July 2023 - 30 June 2024



# Acknowledgement of Country

At Boom Logistics Limited ("BOOM"), we acknowledge and respect the traditional owners of the lands on which we conduct business, and recognise the deep and enduring spiritual connections and relationships that Aboriginal and Torres Strait Islander people have had with land, sea, and community for more than 60,000 years.



# **OUR COMMITMENT AGAINST MODERN SLAVERY**

All forms of modern slavery have no place in our business and are completely against our core values. BOOM is committed to the highest standards of ethical behavior and integrity in how we work. Our high standards prohibit any practices of modern slavery such as deceptive recruitment, forced labour, debt-bonded labour, and child exploitation. We require all employees, officers, contractors and suppliers to operate in accordance with Australia's modern slavery laws.

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BOOM has assessed the risks of modern slavery within our direct workforce as low. Our compliance activities focused on the indirect risks posed by our supply chains.	
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In this Reporting Period, BOOM has undertaken: - implementation of internal training program - survey of top vendors and vendors in industries considered to pose heightened risk - roll out of Supplier Code of Conduct - continued contracting standards with suppliers.	
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BOOM has completed the four activities that we set for ourselves for this reporting period.	
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Boom Logistics Limited is the ultimate holding company of the six subsidiaries within the Group, and its Board of Directors have ultimate oversight on modern slavery compliance activity.	
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Our actions for FY25 will be to build on the modern slavery training both internally, as well as to expand the scope of training to certain suppliers who display low awareness on this issue.

### **REPORTING ENTITY**

Boom Logistics Limited ABN 28 095 466 961 ("BOOM") is a reporting entity under Act. This statement is prepared for the reporting period from 1 July 2023 to 30 June 2024 ("Reporting Period") and describes the steps taken by BOOM to comply with our obligations under the Act.



# OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

BOOM is a supplier of customised lifting solutions to the Australian heavy lift and project logistics market. Our purpose is to safely and profitably grow our business through the provision of innovative lifting solutions and skilled labour hire services in the markets we serve to deliver returns and value to our shareholders.

We are an industry recognised partner for safety, performance and value-added services.

# OUR STRUCTURE

BOOM is an Australian public company listed on the Australian Stock Exchange (ASX:BOL). Our headquarters are in Melbourne, Victoria and our registered address is Suite B, Level 1, 55 Southbank Boulevard, Southbank, Victoria, Australia. BOOM has six wholly-owned Australian subsidiaries (together, the Group or Group Companies).

During the Reporting Period, none of these Group Companies were reporting entities under the Act. Each of the Group Companies share common directors and company secretary as Boom.

Our Group Companies are:

- AKN Pty Ltd
- Boom Logistics Constructions Pty Ltd
- Shutdown Staffing Pty Ltd
- Boom Logistics (VIC) Pty Ltd
- Boom Logistics Project Pty Ltd
- Boom Renewables Pty Ltd



# OUR OPERATIONS

BOOM's business is currently conducted solely within Australia.

We operate and manage 17 depots around Australia and deliver lifting solutions in the following key areas:

- Mining and Resources
- Industrial Maintenance
- Infrastructure
- Energy, Utilities, and Renewable Energy
- Telecommunications

The Group's total workforce exceeded 700 people across Australia as at 30 June 2024. We have approximately 368 full-time employees, 80% of whom provide infield services to customers – including operators, supervisors, safety professionals, engineers and sales personnel. The remainder of our workforce provide management, legal and functional support to the business. We have a flexible workforce of over 291 staff (apart from our full time employees).



#### **Our Locations**

# OUR SUPPLY CHAINS

BOOM has a relatively simple direct supply chain that includes the purchase and leasing of industrial plant and services needed for our day-to-day operations. Our direct supply chain for the purchase of goods and services is sourced predominantly within Australia. This is with the exception of a limited number of plant leasing suppliers based in Europe.

Our operations require these supplies in order to provide labour and equipment to sites, as well as to support our office and administrative functions. Below are some of the supplies our business requires.

- Labour supply services
- Uniforms
- Personal protective equipment
- Office (and kitchen) supplies
- Vehicle hire
- Cleaning services

- IT infrastructure and services
- Travel services
- Insurance and financial services
- Lease of property (office and depots)
- Plant and equipment hire
- Professional advice and services

#### PERCENTAGE OF SPEND (\$AUD) BY SUPPLIER CATEGORY



- Equipment and Assets
- Subcontractors
- Maintenance and Repairs
- Miscellaneous
- Labour and Staffing
- Insurance & Risk Management
- Transport / Haulage Services
- Travel & Accommodation
- Telecommunications & IT
- Property and Leasing
- Finance and Legal
- PPE
- Office and Administration Supplies

#### MODERN SLAVERY RISKS IN OUR OPERATIONS

During the year, BOOM built upon learnings from the previous reporting period as recorded in our Modern Slavery Statement 2023. Our Human Resources, Business Services, Company Secretarial and Legal teams lead a number of activities to assess, identify, and reduce the risks of modern slavery risks in our operations and supply chain.

#### GENERAL ASSESSMENT OF MODERN SLAVERY RISK

The BOOM Group assessed the direct workforce as being at low risk of modern slavery given that our business operations are operated solely within Australia. Australian employment laws and framework are strong in comparison to other countries, due in part to labour laws that apply to all employees and contractors and a highly unionised workforce.

Employment conditions in Australia are covered by the Fair Work Ombudsman's National Employment Standards (NES). These standards set out the 11 minimum employment entitlements that must be provided to all employees by law. In addition, modern awards or industrial agreements negotiated by trade or industry unions cover approximately 90% of our employees. These awards and agreements set minimum pay and employment conditions for specific categories of workers. The remainder of our employees have individual employment contracts, which provide additional conditions and benefits for those employees.

BOOM maintains group policies which further mitigate the direct risks of modern slavery within our own workforce and operations. In order to achieve transparency, we publish our corporate governance documents publicly, and these include:

- Diversity Policy;
- Human Rights and Equal Opportunity Policy;
- Health, Safety and Wellbeing Policy;
- Privacy and Personal Information Policy; and
- Supplier Code of Conduct.

Based on the general risk assessment of our direct workforce outlined above, our efforts during the Reporting Period have been primarily focused on the Group's supply chain.

#### MODERN SLAVERY RISKS IN OUR SUPPLY CHAINS

The majority of our direct suppliers are Australian-based companies. As Australian companies, these suppliers are subject to Australian employment laws and many are reporting entities also under modern slavery laws. Of our overseas-based suppliers, these mainly comprise multi-national suppliers based in Europe who are themselves subject to regulation against modern slavery.



#### **BOOM LOGISTICS SUPPLY CHAIN SPEND**

#### LOCATION AND PERCENTAGE OF SPEND OF SUPPLIERS<sup>1</sup>.



1. BOOM utlised the Walk Free Global Slavery Index to determine country risk. Source https://www.walkfree.org/global-slavery-index/map/

# ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

#### TRAINING

In the current Reporting Period, our internal Human Resources, Business Services, Company Secretarial and Legal teams worked collaboratively with a specialist training provider to develop and deliver to BOOM's employees valuable training on the issue of Modern Slavery awareness.

The Modern Slavery awareness training comprises content developed by legal experts in this field, has now been rolled out to all identified BOOM employees through our dedicated learning platform. Employees and officers who have exposure to procurement or contracting (including in regional operations) are required to complete this training.

We have also implemented procedures to ensure that new staff and those undergoing a role change will receive the training where they have some exposure to procurement, clients and contracting. BOOM believes that this investment in external training for our staff evidences our commitment to the prevention of modern slavery risks, and we will continue to review and refine the training module with our external provider.

#### SURVEY OF VENDORS

In the previous reporting period, the Group surveyed vendors that held key national contracts for the supply of goods or services to all regions of our operations. In the current reporting period, we assessed our top suppliers ranked by spend, as well as those vendors considered to be in 'high risk' sectors. These sectors included providers of uniforms and personal protective equipment.

We also focused on indirect procurement activity through equipment and labour hire providers. We believe that this focus has resulted in our business having a more valuable insight into our supply chain.

Following the survey process, we were assured that our key suppliers of equipment and labour have a degree of awareness of modern slavery risks and are committed to the objective of reducing these risks.

For those suppliers who provided questionnaire responses indicating low visibility into this issue, BOOM will be working further with these suppliers to increase awareness of modern slavery. We plan to provide them access to the same training that we provide to our employees via our external training provider.

#### OUR SUPPLIER CODE OF CONDUCT

In the previous reporting period, BOOM developed a Supplier Code of Conduct with the objective to:

- Detail the high standards that Boom sets for itself as an organisation in relation to human rights and labour practices, and for the ethical conduct of our operations and supply chains.
- Set out our expectations of service providers and suppliers to uphold themselves to the same values in their operations, and management of their supply chains.

In the current reporting period, we rolled out our Supplier Code of Conduct to all vendors and suppliers to our Group via a dedicated modern slavery compliance email address. This comprised all suppliers across our entire operations. This code is also publicly available on our website.

As a further measure to ensure maximum visibility of our high standards, we have incorporated processes to ensure that our Supplier Code of Conduct is sent to all new vendors as part of our internal supplier on-boarding process.



#### **CONTRACTING WITH SUPPLIERS**

When contracting with external suppliers, our Legal division has continued to negotiate modern slavery clauses into contract templates where the supplier's template is lacking. We have noted that the level of visibility on this issue appears to be relatively high in that most contract templates provided to us contained modern slavery compliance clauses.

We also encourage our suppliers and customers to contract on our template Supplier Terms & Conditions, and Customer Terms & Conditions wherever possible. Both of these templates address the issue of modern slavery and are available publicly on our website.

# CASE STUDY: ENGAGING FITTERS FROM THE PHILIPPINES AT BOOM LOGISTICS

During the Reporting Period, BOOM's Human Resources division took the opportunity to consider the engagement of labour service providers and migration services. In 2023, our Group identified a skills gap in our operations due to increased project demands. After thorough analysis, it was recommended to recruit skilled diesel fitters from overseas to meet our client's needs for crane maintenance. Our previous Modern Slavery Statement 2023 detailed the selection of the specialist recruitment provider.



Following an extensive recruitment process, BOOM was thrilled to welcome six skilled fitters recruited directly from the Philippines. For such specialist recruitment activity, BOOM has implemented a multi-tiered review process involving legal review through the Human Resources division, procurement and legal functions with the aim of minimising any modern slavery risks associated with this recruitment activity.

This recruitment indicates our commitment against modern slavery, as we are aware that a high proportion of the world's modern slavery occurs in Asia and the Pacific.<sup>2.</sup> Further and in order to ensure that this recruitment activity was consistent with BOOM's stringent standards and stance against modern slavery, we undertook a due diligence process in vetting potential providers and engaged a reputable recruitment provider based in Australia with a demonstrated track record in ethical and compliant conduct. By conducting a transparent recruitment process, including due diligence on our recruitment provider, BOOM effectively addresses skills shortages whilst prioritising a high level of welfare for our new recruits, which will in turn, benefit their families.

The Group's Modern Slavery Program is complemented by governance and operational policies. All employees and officers of the Group Companies are bound by BOOM's policies and procedures. These policies provide mechanisms for our people to report concerns about suspected or actual improper conduct, including the issue of modern slavery, and for us to remediate the impact of modern slavery in our operations and supply chains.

#### **GROUP POLICIES**

The Group's core governance policies are made available on our website and can be accessed at Corporate Governance - BOOM Logistics. The below in particular illustrate the Group's commitment to our compliance obligations.

- Human Rights and Equal Opportunity Policy: this policy sets out that every employee of the Group will be judged on their merits, and the Group will provide equality in employment for all people employed or seeking employment. The policy details that Boom will not tolerate the use of child or forced labour, debt bondage, deceptive recruitment practices, and other forms of modern slavery. It is one of the main documents establishing Boom's compliance with modern slavery laws and is referenced in our modern slavery training for all staff.
- Fraud Risk Management Policy: The purpose of the Fraud Risk Management Policy is to assist all staff and officers to understand their obligations in relation to fraud and corruption and what types of behaviour can be a breach. The Policy also sets out key obligations for employees on how to report violations or suspected bribery or fraudulent conduct.



- Speaking Up Policy: The Speaking up Policy is available on our public website and embodies principles from the Whistleblower legislation. BOOM is committed to ensuring that our workforce complies with the law and the highest ethical standards of behavior. By speaking up, employees can help to detect and prevent illegal and other unethical conduct, providing an anonymous and confidential avenue for reporting concerns without fear of repercussions.
- Code of Conduct: Our Code of Conduct provides all staff with a practical set of principles and standards that should be applied in their day-to-day work. The Code of Conduct embodies honesty, integrity, quality, trust and respect. All Boom employees undertake training on the Code of Conduct.
- **Remuneration Policy**: this policy ensures all employees are remunerated fairly, ensuring compliance and setting benchmarks against the industrial and services industry guidelines. Salary reviews are conducted annually and are directly linked with performance levels over the review period through BOOM's performance review process, as well as aligning with market movement and company performance.

#### OUR COMMITTEES AND BOARD

The purpose of BOOM's Environmental, Social and Governance Committee (ESG Committee) is to assist the Board to oversee our performance in environmental, health and safety, corporate social responsibility, climate change impacts, energy and natural resources conservation, sustainability, corporate governance, reputation, diversity, equity and inclusion, community issues, human rights and other environmental, social or governance and other matters.

BOOM's Audit and Risk Committee (ARC) and ESG Committee are comprised of independent non-executive directors. The ESG Committee regularly receives compliance reports which includes the status of compliance with key laws and regulations and processes for review, including the Act. Any notifications made under the Speaking Up Policy (including on modern slavery), would also be reported to the ARC.

The ESG Committee is responsible for reviewing and assessing Boom's compliance with the Act including any disclosures made during the Reporting Period, any matters under investigation relating to modern slavery reports or claims, and the effectiveness of the due diligence and risk assessment processes. Through its ARC and ESG Committees, BOOM recognises the importance of continuous improvement and constant reassessment of our compliance with modern slavery laws.

Oversight of the ESG Committee and ultimate approval of the Modern Slavery Program is provided by the Board of Directors of BOOM, as the ultimate holding company of the group subsidiaries.

# ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

BOOM regards the effectiveness of its actions to be a continuous improvement exercise.

In relation to our FY24 objectives, as set out in our Modern Slavery Statement 2023, we can confirm completion of the four listed activities as follows:

Introduction of the Supplier Code of Conduct to all BOOM's suppliers and service providers, also to employees engaged in procurement activity.

Development of mandatory selected employee training module on the field of modern slavery.

Further review of our supply chains, with a focus on high-risk suppliers as identified based on industry sector and geography.

Multi-tiered review process for migration services and foreign labour service providers for any overseas recruitment activity.





### CONSULTATION

During the Reporting Period, BOOM has actively engaged and consulted with all companies owned or controlled in the development of this Statement. We discussed details of the Modern Slavery Act reporting requirements and provided them with relevant materials and updates.

Prior to submission to the Board of Directors of BOOM for review and approval, this statement was prepared in consultation with the Group Companies in addition to senior management and representatives from the Legal, Company Secretarial, Human Resources, and our Business Support Centre which handles all procurement activities.

# LOOKING AHEAD AND OUR FUTURE

BOOM is committed to the further improvement of its modern slavery risk management activities.

Our future aims for FY25 are as follows:

- Training, Impact and Content we will track our completion rates to ensure positive engagement by our staff and update training content to ensure it remains relevant and impactful.
- Supplier questionnaires we will be working with those suppliers whom we have identified as having a lower visibility of modern slavery. Where possible, we will be looking to offer the same training to them as we currently offer to our selected staff.



This modern slavery statement was endorsed by the ESG Committee and has been approved by the Board of Boom Logistics Limited on 18 December 2024.

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Kieran Pryke Chair 18 December 2024