

▲ MODERN SLAVERY  
STATEMENT

1 July 2022 – 30 June 2023



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## ▲ ACKNOWLEDGEMENT OF COUNTRY

At Boom Logistics, 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.

## ▲ ABOUT THE BUSINESS

Boom Logistics Limited ABN 28 095 466 961 (“Boom”) is a reporting entity under the *Modern Slavery Act 2018 (Cth)* (the Act). This statement is prepared for the reporting period from 1 July 2022 to 30 June 2023 (Reporting Period) and describes the steps taken by Boom during the Reporting Period to identify, manage and mitigate the specific risks of modern slavery in our operations and supply chain and how we evaluate the effectiveness of our actions.

All forms of modern slavery have no place in our business and are completely at odds with Boom’s values. Boom is committed to working towards the highest standards of ethics and integrity in our operations and supply chain. We require our directors, officers, employees, contractors and suppliers to operate in accordance with Australia’s modern slavery laws including those prohibiting any practices of modern slavery such as deceptive recruitment, forced labour, debt-bonded labour, human trafficking and child exploitation.

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## ▲ HOW WE HAVE ADDRESSED THE REPORTING CRITERIA

The table below sets out where in this Statement we have addressed the mandatory reporting criteria under the Australian Modern Slavery Act.

Australian Modern Slavery Act mandatory reporting criteria	Addressed in this Statement	
	Section	Summary
Identify the reporting entity;	Reporting entities covered by this statement	1.2 Reporting Entities Covered by this Statement
Describe the structure, operations and supply chains of the reporting entity;	1.0 Boom Structure, Operations and Supply Chains	1.1 Our Structure 1.2 Reporting Entities Covered by the Statement 1.3 Our Operations 1.4 Our supply Chains
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls;	2.0 Modern Slavery risks in our supply chain	2.1 Modern Slavery Risks in our Operations 2.2 Modern Slavery Risks in our Supply Chains
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes;	3.0 Actions to Address and Assess Modern Slavery Risks	3.1 Due diligence and supply chain management 3.2 Updates to key Governance Documents 3.3 Training 3.4 Remediation and Grievance Mechanisms
Describe how the reporting entity assesses the effectiveness of such actions;	4.0 Assessing the Effectiveness of our Actions	4.1 Governance and Oversight
Describe the process of consultation with each reporting entity covered by the joint statement and with any entities that each of those reporting entities own or control	5.0 Consultation	5.0 Consultation Consultation with each reporting entity
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	6.0 Looking Ahead and our Future	6.0 Looking Ahead and our Future FY24 Actions

## 1.0 BOOM LOGISTICS STRUCTURE, OPERATIONS AND SUPPLY CHAINS

### 1.1 Our Structure



Boom is a full service wet hire lifting solutions business. As a large-scale lifting project specialist, Boom delivers innovative solutions for customers and ensures safety excellence.

Boom continues to build its leading reputation in the market as a trusted lifting solutions provider in the resources, renewables, infrastructure, and industrials sectors.

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, VIC, Australia.

### 1.2 Reporting Identities Covered by this Statement

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

Boom Logistics Limited has six wholly-owned Australian subsidiaries (together, the Group or Group Companies) as depicted.

During the Reporting Period, none of these Group Companies were reporting entities under the Act. Each of the Group Companies has the same directors and company secretary as Boom. Further information about the Group Companies is detailed in the 2023 Annual Report (see page 55).

### 1.3 Our Operations

Boom’s business is conducted within Australia only. We operate and manage 14 depots around Australia and deliver lifting solutions. Our key operations are:

- **Resources** – including mining maintenance services, engineered specialised lifts, shutdown, industrial and programmed maintenance services;
- **Renewables** – wind farm installation and maintenance programs, transmission ‘string-

line' installation works on wind farms, interconnector and power grid projects;

- **Infrastructure** - bridge installations, rail and civil infrastructure installation, and interconnector and energy infrastructure projects;
- **Industrials** – specialist labour services related to mining shutdown and maintenance, oil and gas maintenance services and heavy industry.

In addition, the Group has commercial leases on certain plant and equipment, motor vehicles and property. Plant and equipment leases generally have 1 to 5 year lease terms, while motor vehicles and other property leases generally have 1 to 4 year lease terms. Further information about our leasing arrangements for the Reporting Period is detailed in the 2023 Annual Report (see page 54).

The Group's total full-time and flexible workforce exceeded 750 people across Australia during FY23. We have approximately 400 full-time employees, 80% of whom provide in-field services to customers – including operators, supervisors, safety professionals, engineers and sales personnel – while the remainder comprise of management and functional support to the business. Our flexible workforce of over 350 staff outside of our full time employees enable the company to effectively flex our labour requirements to support a variety of projects including maintenance shutdowns.

In Australia, employment conditions are covered by the National Employment Standards (NES), which set out the 10 minimum employment entitlements that have to be provided to all employees. In addition, modern awards or industrial agreements cover approximately 90% of our employees, which set minimum pay and employment conditions for specific categories of workers. The remainder of our employees have individual employment contracts, which provide additional conditions for an individual employee.

#### 1.4 Our Supply Chains

Our direct supply chain (i.e. the purchase of goods and services) is sourced predominantly within Australia with the exception of a small number of plant leasing suppliers based in Europe. 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.

These include the leasing of plant and equipment, property leases, vehicle hire, haulage, labour supply services, office (and kitchen) supplies, uniforms, personal protective equipment, IT infrastructure, telecommunications, external professional advice, travel, finance, insurance, cleaning services and ancillary support services.

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## ▲ 2.0 MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

### 2.1 Modern Slavery Risks in our Operations

During the Reporting Period, Boom and the Group, considered the extent to which it may contribute to or be linked to modern slavery risks in its operations and supply chain.

The Group assessed the direct workforce as being low risk to modern slavery as our business operations are solely operated within Australia, and a very active union supports most of our workforce. The employment laws and framework in Australia are strong in comparison to other countries, with labour laws that cover all employees such as the National Employment Standards, Enterprise Agreements and Modern Awards. Boom also considers that its policies and basis of employment further mitigate the direct risks of modern slavery within our own workforce and operations.

Accordingly, we consider that our greatest risk of involvement in modern slavery is being indirectly and arising through our supplier relationships. Boom's actions during the Reporting Period have therefore focused on the Group's supply chain.

### 2.2 Modern Slavery Risks in our Supply Chains

During the reporting period, the group considered the risks of modern slavery in our supply chain.

The majority of our direct suppliers are local Australian companies or multi-national corporations who are themselves subject to modern slavery law. They are also required to conduct due diligence on modern slavery within their own operations and supply chains, and we therefore consider the risk of modern slavery to be low.

However, while we consider the risk of modern slavery in the group supply chains to be low, the following key areas were identified for potential modern slavery risks and have been the focus of our program to date:

- uniforms and PPE;
- equipment consumables such as tyres and lifting/rigging gear;
- temporary labour services (including potential use of overseas labour and migration services) to assist in filling local skills shortages.

## ▲ 3.0 ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

During the reporting period, the Group undertook the following actions to better assess and address potential modern slavery risks in our operations and supply chain.

### 3.1 Due Diligence and Supply Chain Management

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### Vendor Screening

The Group's supply contracts are managed by our internal National Procurement Manager. Our processes for selection includes tendering and engagement with internal subject matter experts, due diligence, legal review and use of external consultants to assist where appropriate. Boom has multiple suppliers for certain categories, and typically conducts a competitive tender process.

All supply agreements were reviewed by Boom's in-house legal team, and approved under the Delegation of Authority Policy. The preferred agreement is the Boom supplier terms and conditions, which includes provisions to comply with modern slavery and anti-bribery and corruption laws.

### Self-Assessment Questionnaire

During the Reporting Period, Boom's top suppliers according to spend per annum were asked to complete and return a Modern Slavery Questionnaire. This questionnaire was based on the Australian Border Force template questionnaire, which enabled us to assess the supplier's engagement and initiative on the topic.

Responses have been received and are currently being reviewed. It is envisaged that further action and potentially remedial engagement will be initiated with any suppliers or service providers that have a low level of visibility or low level of engagement on this issue.

## 3.2 Updates to Key Governance Documents

In the reporting period the Group had several important updates to our key Governance documents involving our supply chain:

### Supplier Terms and Conditions

The Group's standard terms and conditions of supply require suppliers to warrant that they will comply with all relevant laws and regulations, which includes the Act. Boom requires suppliers to agree that they will comply with the Act, and that they have implemented due diligence procedures for their own suppliers to ensure there is no breach.

The terms and conditions of all supplier contracts entered into or renewed during the Reporting Period were consistent with the above practice. Additionally, Boom's HSEQ systems require our suppliers to agree to abide by our policies.

### Good and Services Contract

Boom's Goods and Services Contract has also been updated during the Reporting Period with relevant obligations. Our terms require any contractors to warrant compliance with the Act, and to

### **Recruitment services provider and our action taken**

In recent negotiations to engage a new recruitment services provider located in South-East Asia, Boom's due diligence detected that the potential recruiter's practices were not transparent and did not comply with the high standards we require.

Boom's investigations highlighted issues with the potential recruiter's engagement practices with its candidates. Following our review, Boom decided to engage with a different provider who has committed to compliance with our Supplier Code of Conduct and stance against modern slavery.

Boom requires the inclusion of a modern slavery compliance clause in its contracts for engagement of labour services.



conduct due diligence on its own suppliers and subcontractors to identify any modern slavery in their supply chains.

### Supplier Code of Conduct

This Reporting Period, the Group developed a Supplier Code of Conduct. The purpose of the Supplier Code of Conduct is 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, as well as in the management of their supply chains.

The Code requires suppliers to take pro-active steps to identify any modern slavery risks, as well as a requirement to comply with anti-bribery and corruption legislation. It is envisaged that following publication of the Code on our website, that all of the Group's suppliers and service providers will be required to acknowledge their adherence and ongoing compliance.

### 3.3 Training

Training must be completed by employees when they join the Group to ensure our employees understand their obligations under the Group's policies including the Code of Conduct Policy, Speaking Up Policy and Human Rights and Equal Opportunity Policy. Induction training is delivered to employees in the form of online courses.

Procurement specialists have increased awareness of these obligations and the risks of modern slavery in the Group's operations and supply chain. This involves Procurement team having regular discussions with national suppliers in review meetings concerning this issue.

Awareness training will be provided on the Supplier Code of Conduct to all national suppliers. It will be available on our website once approved by the Board.

### 3.4 Remediation and Grievance Mechanisms

The Group's modern slavery program is complemented by governance and operational policies. The directors, officers, employees and contractors of the Group Companies are all bound by Boom's policies and procedures. These policies provide mechanisms for our people to report concerns about suspected or actual improper conduct, including in relation to modern slavery, and for us to remediate the impact of modern slavery in our operations and supply chains.

Key policies which are directly relevant to our modern slavery program include:

- **Code of Conduct:** enforces our commitment to integrity, respect and accountability respect, and governs the conduct and behaviour of Boom's directors, officers, employees and contractors throughout the organisation. This includes upholding Boom's values and
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compliance with any applicable policies, procedures, laws and regulations, which include those that deal with modern slavery. Compliance with this Code of Conduct is mandatory.

- **Speaking Up Policy:** further highlights Boom’s commitment to detecting and preventing illegal and other undesirable conduct within the business and provides a mechanism whereby employees and others can confidentially report any concerns freely and without fear of repercussion. Reports may be made anonymously.
- **Fraud Risk Management Policy:** sets out Boom’s commitment to ensuring that a culture of honesty and opposition to fraud is established and maintained to ensure that effective fraud and corruption prevention is an integral part of the day-to-day operations of Boom. The Policy also sets out what constitutes fraud and corruption, key obligations for all employees and how to report violations or suspected conduct.
- **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 also details that Boom will not tolerate the use of child or forced labour, nor exploitation of children in any of its operations or facilities and adheres to upholds or standards and abide by governing laws.
- **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 Logistics performance review process, as well as aligning with market movement and company performance.

The Group’s core governance policies are made available on our website and can be accessed here: [Corporate Governance - BOOM Logistics](#).

#### ▲ 4.0 ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Boom strives to improve our modern slavery risk program. Below, we have outlined how we assessed the effectiveness of our actions in addressing the risk of modern slavery during the Reporting Period.

##### 4.1 Governance and Oversight

Boom’s Board has an Audit and Risk Committee (**ARC**) and an Environment Social and Governance Committee (**ESG**) which are comprised of independent non-executive directors. The Committees 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 or whistleblower calls, including any relating to modern slavery,

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are also reported to the ARC in the relevant compliance report.

The ESG Committee is also responsible for reviewing and assessing Boom's compliance with the Act including any disclosures made during the Reporting Period, whether there are any matters under investigation relating to modern slavery reports or claims, the effectiveness of the due diligence and risk assessment processes detailed in this statement and any opportunities for further improvement. Boom, the ARC and ESG Committees recognise the importance of reviewing and assessing the effectiveness of the measures in place to ensure Boom's ongoing compliance with the Act.

During the Reporting Period, the Human Resources division has had opportunity to consider the engagement of labour service providers and migration services. This has been implemented with the aim of bringing in migrant workers in critical skills shortage areas such as diesel mechanics. For such specialist recruitment activity, Boom has implemented a multi-tiered review process involving legal review through the Group human resources, procurement and legal functions with the aim of minimising any modern slavery risks associated with this activity.

## ▲ 5.0 CONSULTATION

Prior to being put to the Board of Boom Logistics Limited for review and approval, this statement was prepared in consultation with the Group Companies in addition to senior management and representatives from the contracting, procurement, human resources, legal and company secretariat functions.

## ▲ 6.0 LOOKING AHEAD AND OUR FUTURE

Boom is committed to the development of its modern slavery risk management activities.

Our future aims for FY24 and beyond include:

- 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 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.
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This modern slavery statement was endorsed by the ESG Committee and has been approved by the Board of Boom Logistics Limited on 20 December 2023.



**Kieran Pryke**  
**Chair**  
20 December 2023