



# Modern Slavery Statement FY2025



1 July 2024 - 30 June 2025

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[www.boomlogistics.com.au](http://www.boomlogistics.com.au)

OUR LOCATIONS

VIC | WA | NSW | QLD | SA

# OUR COMMITMENT AGAINST MODERN SLAVERY

Boom Logistics Limited ("BOOM") is committed to the highest standards of ethical behaviour and integrity in how we work. All forms of modern slavery have no place in our business and go against our core values. We prohibit any practices of modern slavery such as deceptive recruitment, forced labour, debt-bonded labour, and under-age exploitation.

We require all employees, officers, contractors and suppliers to operate in accordance with the high standards we set for ourselves.



## ACKNOWLEDGEMENT OF COUNTRY

At 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.

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Boom Logistics Limited is the reporting entity. Our group comprises of this company and six wholly owned subsidiaries.	
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BOOM's operations are located wholly within Australia. We service clients within the mining, infrastructure and construction industries with lifting solutions and skilled labour.	
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As we have assessed the risks of modern slavery within our direct workforce as low, our activities focussed on the indirect risks posed by our supply chains.	
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In this Reporting Period, BOOM has:	
<ul style="list-style-type: none"><li>• formed a centralised Procurement Team;</li><li>• introduced improvements to supplier due diligence; and</li><li>• continued working with suppliers whom we identified in FY24 as having a low visibility or engagement on modern slavery.</li></ul>	
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We assess the effectiveness of our actions by being able to achieve the objectives we set for ourselves for this Reporting Period, whilst also setting further activities for FY26.	
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BOOM has consulted internally across various business divisions in the preparation of this Statement, as well as with all of its Group Companies. Oversight was provided by our Environmental, Social and Governance Committee.	
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Our actions for FY26 will be to further strengthen our supply chain management, training engagement, and review our engagement of third party labour providers.	

# 1. REPORTING ENTITY

Boom Logistics Limited ABN 28 095 466 961 (“BOOM”) is a reporting entity under the federal Modern Slavery Act 2018 (“the Act”). This Statement is prepared for the reporting period from 1 July 2024 to 30 June 2025 (“Reporting Period”).



**Mining &  
Resources**

## 2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

We are a supplier of specialist lifting solutions and project logistics services to the Australian mining, construction, renewable energy and infrastructure industries. Our purpose is to safely and profitably grow our business through the provision of innovative lifting solutions and specialised labour hire services in the various states in which we operate.



**Renewables**

### Our Structure

BOOM is a public company listed on the Australian Stock Exchange (ASX:BOL). Our headquarters are in Melbourne, and our registered address is Suite 6, Level 3, 100 Dorcas Street, Southbank, Victoria, Australia.



**Infrastructure**

There are six wholly owned Australian subsidiaries (together, the Group or Group Companies), owned by 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.

Each of the Group Companies share common directors and the company secretary of BOOM. During the Reporting Period, none of BOOM’s subsidiaries were reporting entities under the Act.



**Industrial  
Maintenance**

### Our Operations

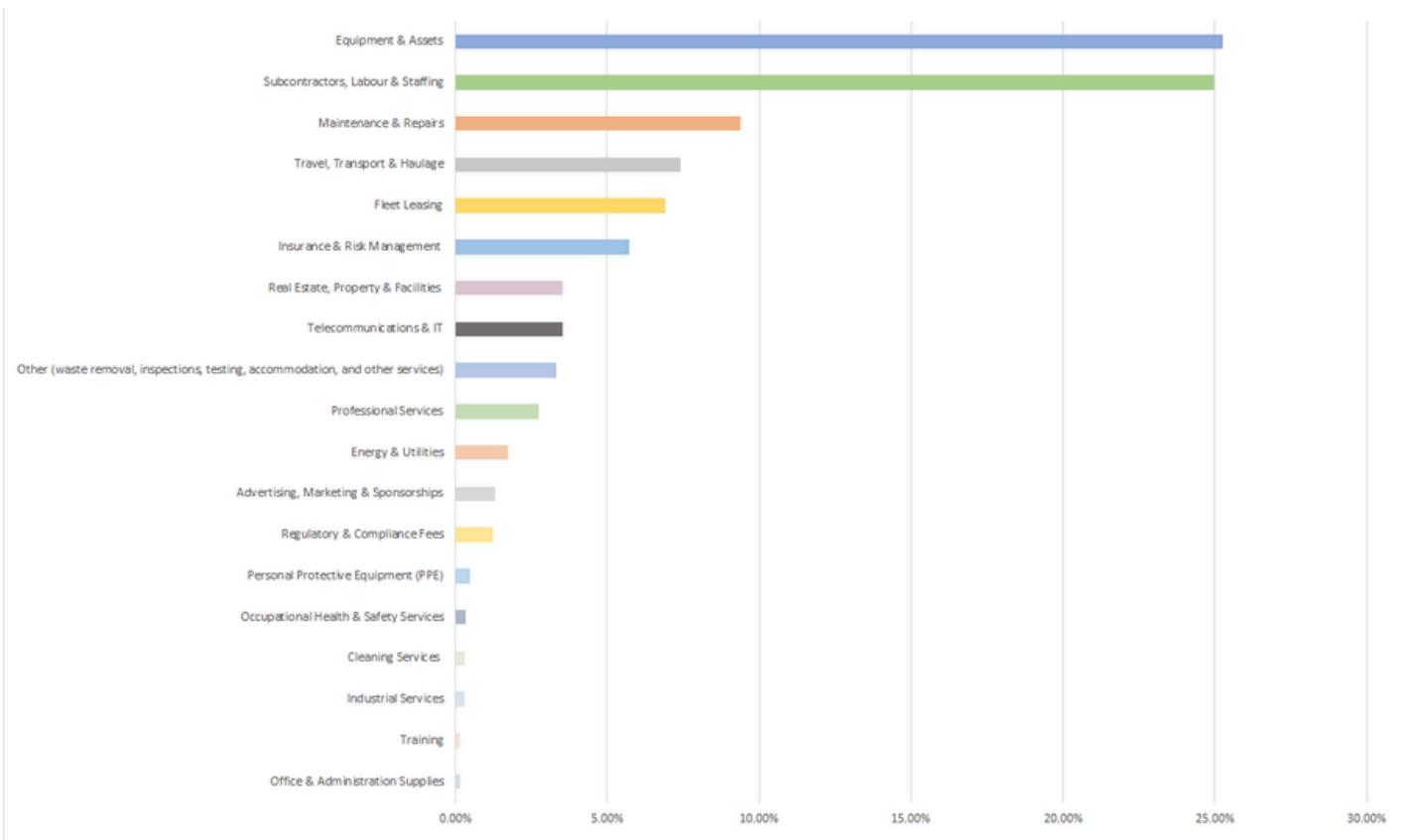
BOOM operates solely within Australia through our 18 depots and offices, in the key businesses depicted.

Our total workforce exceeded 800 people across Australia as at 30 June 2025. We have approximately 441 full-time employees, 78% of whom provide in-field services to customers – including operators, supervisors, safety professionals, engineers and sales personnel. The remainder of our workforce provide management, accounting, legal and functional support to the business. We have a flexible workforce of over 378 staff (in addition to our full-time employees).

## Our Supply chain

Our business has a relatively simple supply chain that includes the purchase and leasing of industrial plant and services required for our day-to-day operations. Our operations require these supplies in order to provide labour and equipment to sites, as well as to support our management and administrative functions.

**FIGURE 1: PERCENTAGE OF SPEND (AUDS)**



As can be seen, our spending supports our core business being the supply of equipment and labour to our customers. We also undertake office and management functions, and our spending includes inputs such as premises leases, insurance, and professional services.

### 3. MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN AND OPERATIONS

Our efforts during the Reporting Period have been primarily focused on our supply chain, as we have assessed the risks of modern slavery within our workforce as low.

#### Our Direct Workforce

We assess that our direct workforce has a low risk of modern slavery. This is due to our operations being conducted solely within Australia, a jurisdiction with relatively strong labour laws and protections.

We took note of the following factors in our assessment:

- Employment conditions for all our workers are covered by the Fair Work Ombudsman's National Employment Standards (NES).
- Approximately 90% of employees are covered by modern awards or enterprise agreements negotiated with unions.
- The remaining employees are engaged under individual contracts that provide additional (above award) benefits and protections.
- Our workforce is highly unionised, which makes employment terms transparent.

Where we engage labour via third party labour hire service providers, these suppliers are also based within Australia.

#### Supply Chain Overview

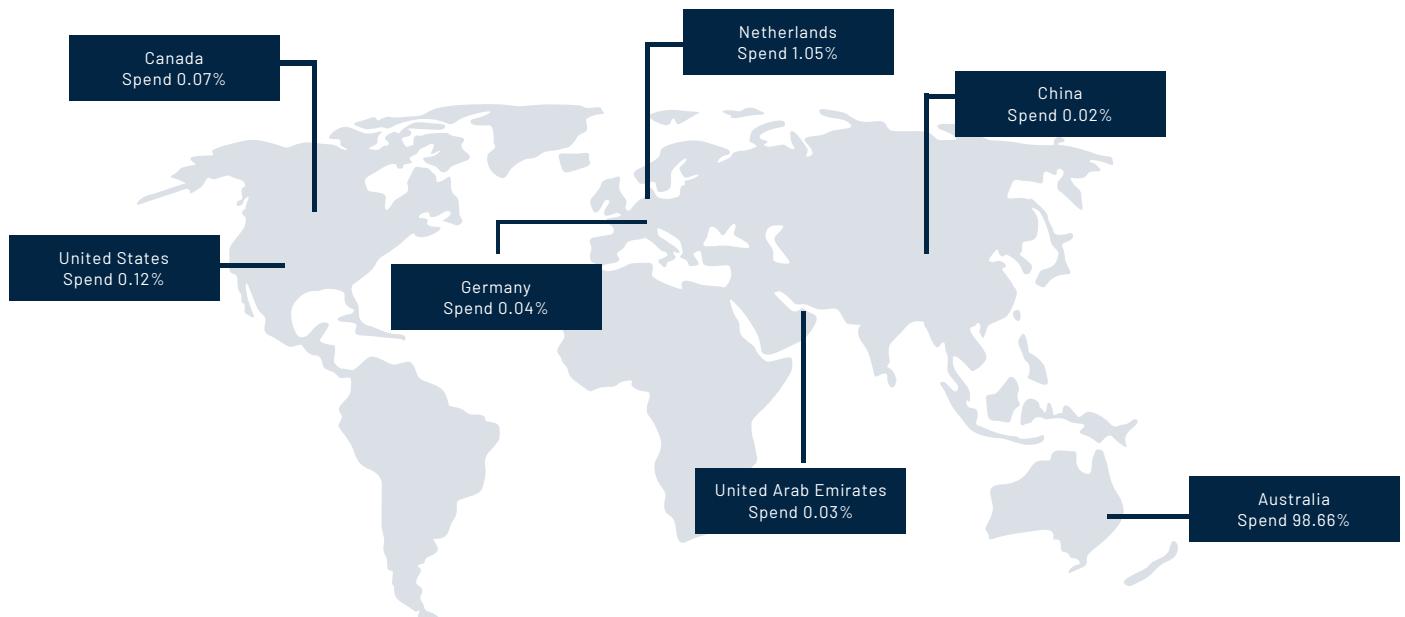
The majority of our direct suppliers are Australian-based companies, who themselves are subject to Australian employment laws, with many also being reporting entities under the Act.

**FIGURE 2: BOOM'S SUPPLY CHAIN SPEND**



Both Figure 2 and Figure 3 depict the proportion of supplies that we source from overseas. Of our overseas-based suppliers, these mainly comprise of multi-national suppliers based in Europe, who themselves subject to regulation against modern slavery.

### FIGURE 3: GEOGRAPHICAL LOCATION OF OUR FY25 PROCUREMENT



The small proportion of procurement sourced from outside Australia mainly comes from countries with low geographic risk.<sup>1</sup> We set out a case study on page 10 in relation to equipment that we recently purchased from China.



<sup>1</sup> See page 81, *Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities (May 2023)*. Some countries have high geographic risk due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors such as poverty.

## 4. ACTIONS TO ADDRESS AND ASSESS MODERN SLAVERY RISKS

During FY25, BOOM continued to build upon the insights gained from previous years. Our Legal, Procurement, and HR divisions led a co-ordinated effort to assess, identify, and mitigate modern slavery risks within our operations and supply chains.

### i. Enhancing Supplier Due Diligence and Visibility

We identified that the lack of a centralised procurement framework has resulted in our organisation having less visibility over our suppliers than desired. Supplier due diligence had to date been conducted through a multi-departmental, manual process.

In furtherance of our compliance objectives, a centralised Procurement function was formed comprising skilled professionals with relevant industry experience, who are now responsible for oversight of all procurement.

The Procurement team have already commenced a significant enhancement of our supplier management procedures to increase visibility of our supply chain, and ensure stronger due diligence on suppliers in line with our modern slavery commitments.

We introduced a structured and more risk-aware approach to supplier engagement, designed to identify and mitigate potential modern slavery risks before contractual relationships are established. This was achieved by the following measures.

- **Pre-qualification Procedure** – BOOM now requires that all new suppliers answer our pre-qualification application. We request answers and documentation on critical areas to assess the supplier's compliance with health safety, environmental (HSE) standards, modern slavery legislation, amongst other areas.
- **Supplier on-boarding improvements** – our on-boarding process is now centralised, with a dedicated contact person responsible for managing supplier due diligence across the business. The centralised on-boarding team will oversee due diligence, ensuring our modern slavery and regulatory compliance is met prior to any engagement.

## ii. Ongoing Engagement with Suppliers

BOOM continued its engagement with those suppliers who demonstrated low awareness or engagement based on their responses to our Modern Slavery Supplier Questionnaire. Suppliers were reminded that BOOM is a reporting entity under the Act, and were provided with a copy of our Supplier Code of Conduct.

Our correspondence to these suppliers reiterated that they played a role in supporting our commitment to ethical sourcing and human rights, and that we would be looking to source our supplies from other providers where compliance is lacking.

### **High risk industry risk assessment**

BOOM have taken particular note of any procurement from high industry risk vendors. Industry-based risk arises due to a sector or industry's particular "characteristics, products and processes".<sup>2</sup> In addition to mandatory training for staff involved in procurement, we have identified areas for further review in FY26 in order to ensure we are taking all possible steps to reduce our risk of modern slavery.

High risk industries	Our procurement / mitigating steps	FY26 objectives
<b>Textiles</b> – high industry risk due to forced and child labour, poor working conditions in this sector (which is prevalent in developing countries).	<p>BOOM procure personal protective equipment (PPE), uniforms, clothing and merchandise branded with our logo (such as hats, canvas bags, water bottles).</p> <p>We aim to contract with Australian-based suppliers, who themselves are subject to minimum age and wage laws, and other workplace standards.</p> <p>In the Reporting Period, approximately 95% of our supplies from this sector was from Australian-based suppliers. For which we procured one bulk supply from China, and engaged a customs agent based in New South Wales.</p>	In FY26, we aim to ensure that all supplies from this industry will be first vetted by our Procurement team
<b>Extractives</b> – mining and other extractive industries often have poor working conditions (this occurs in Africa and other parts of the world).	<p>BOOM do not procure any goods or services from extractive industries, however we do work for customers in extractive industries – by providing equipment and labour. In some instances, we engage workers through third party labour hire providers.</p> <p>When engaging workers through labour hire providers, we still retain visibility of the worker. As we carry out pre-employment screening (such as identity verification and confirmation of medical fitness for work), and provide site inductions to workers. This industry risk is also somewhat mitigated by the fact that we operate solely within Australia, a jurisdiction with strong labour laws.</p>	In FY26, we aim to conduct a review of third party labour provider engagement.

<sup>2</sup> See Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities (May 2023).

### iii. Refreshed internal training

During the Reporting Period, we successfully delivered an updated Modern Slavery Awareness Training module to all identified BOOM employees via our dedicated learning platform. This built on our work in FY24 to develop training with external training provider.

This training was made mandatory for all staff and management involved in contracting, procurement, and supplier engagement, and is now required to be undertaken every year. We will continue to track completion rates to maximise internal engagement on this issue.

### Case Study - Acquisition of New Crawler Crane Manufactured in China

BOOM recently purchased a crawler crane to be based on a long-term basis at a mine site in Western Australia. The mine is located in a very remote location being 476 km away from the nearest town (Port Hedland), and 1,724 km away from the state capital of Perth.

This remoteness along with the high heat and dust meant that BOOM needed to select a crane that was capable of handling the harsh conditions, whilst having the correct lifting capacity. Analysing all operational, financial, ethical metrics, the Chinese-manufactured XCMG XGC320 emerged as the best option.

The purchase was managed through an Australian-based sales agent – Ronco Group, based in Western Australia who provided us with their Modern Slavery Policy, and reiterated to us their commitment to ensuring that their supplies are free of any modern slavery.

Our supplier also put us in direct contact with the original equipment manufacturer XCMG (both their Australian-based distributor and the parent company, based in China). Our questions regarding modern slavery compliance were answered by the XCMG entities promptly, and to our satisfaction.

We aim to continue procuring from businesses with a record of high ethical compliance.



## 5. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

BOOM has achieved the actions we set for ourselves this Reporting Period, as set out in our Modern Slavery Statement 2024<sup>3</sup>:

**I. Training, Impact and Content** – track completion rates to promote staff engagement and update training content to keep it relevant and impactful.



**II. Supplier Questionnaires** – we worked with those suppliers identified as having a lower visibility or engagement of modern slavery.



**III. Supplier Due Diligence** – we enhanced oversight of our suppliers by the creation of a centralised Procurement function, and made improvements to due diligence and on-boarding.



We have not received any reports of incidents internally or from our customers, suppliers or business partners regarding modern slavery in our operations or supply chain. Our policies provide mechanisms for our people to report concerns about suspected or actual improper conduct.

The particular policies below demonstrate our commitment to regulatory compliance.

- Human Rights and Equal Opportunity Policy.
- Speaking Up Policy.
- Supplier Code of Conduct.
- Code of Conduct.
- Fraud Risk Management Policy.

<sup>3</sup> See page 17, BOOM Logistics Ltd FY24 Modern Slavery Statement, in which we set as our objectives the activities in I and II (only).

## 6. CONSULTATION

This Statement was prepared following consultation with our internal Company Secretarial, Legal, Procurement, Human Resources, and Business Support Centre teams. BOOM actively engaged and consulted with all Group Companies. We shared relevant materials and updates and discussed details of the reporting requirements.

Prior to review and approval by BOOM's Board of Directors, this Statement was reviewed by our Environmental, Social and Governance Committee (ESG Committee). The ESG Committee is responsible for reviewing and assessing our compliance with the Act, including any disclosures made, matters under investigation, and the effectiveness of the due diligence and risk assessment processes.

More broadly, the ESG Committee is responsible for overseeing 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.

Following review by the ESG Committee, this Statement was presented to and approved by the Board of Directors of BOOM, the ultimate holding company of the Group.



## 7. LOOKING AHEAD AND OUR FUTURE

Our objectives for FY26 build upon the work we have done in previous reporting periods.

Through our recently formed centralised Procurement Team, we will aim to introduce further supply chain transparency, by prioritising ethical sourcing and embedding modern slavery risk management into every stage of procurement.

We aim to undertake the following tasks:

- **Supplier management** – to implement a risk-based supplier management program, including introducing a procedure for us to conduct audits.
- **Labour hire service providers** – to review our engagement of material labour hire service providers, given the potential lower visibility of supply in using third parties.
- **Modern slavery training** – to review our implementation of training, by potentially widening the number of personnel identified as requiring training, and encouraging engagement by our staff.

This Modern Slavery Statement was endorsed by the ESG Committee and has been approved by the Board of Boom Logistics Limited on 17 December 2025.



**Kieran Pryke**

**Chair**

17 December 2025