

## **What is the purpose of this Policy?**

Boom Logistics Limited (BOOM, or 'the Company') is committed to ensuring that Directors, Executives, employees and contractors comply with the law, BOOM Charters and Policies and BOOM's ethical standards, as detailed in the company's Code of Conduct and Fraud policies. BOOM is committed to detecting and preventing illegal and other undesirable conduct and therefore must provide a mechanism whereby employees and others can report their concerns freely and without fear of repercussion.

This Policy details this mechanism and encourages the reporting of such conduct. The Company will not tolerate harassment or victimisation and will take action to protect those who raise a concern in good faith.

## **Who must comply with this Policy?**

This Policy applies to all Directors, Executives, employees (whether permanent, part-time, fixed term, temporary or casual), contractors, consultants and secondees of BOOM, suppliers and service providers, and their employees. Additionally, any individual who formerly held such a position or their relative (such as a spouse or dependant) may make a disclosure.

## **What is the policy?**

The Speaking Up Policy has been developed to ensure employees can raise genuine concerns regarding actual or suspected breaches of our ethical and legal standards (including suspected instances of fraud or corruption) without fear of reprisal or feeling threatened by doing so.

This Policy aims to:

- encourage people to report an issue if they genuinely believe someone has breached the BOOM Company Policies and Charters, Code of Conduct, the law or has been involved in fraud or corruption;
- outline the procedure that will be followed to deal with all reported misconduct or unethical behaviour; and
- assist in ensuring that serious misconduct or unethical behaviour is identified and dealt with appropriately and in a timely manner.

This Policy should be read in conjunction with BOOM's Code of Conduct and Fraud Policies.

## **What are the key obligations for all employees under this Policy?**

All employees are encouraged to report any matters or behaviours that they genuinely believe breach BOOM's Company Charter and Policies, Ethical Standards or the law, or is believed to be fraudulent or corrupt behaviour.

Appendix A sets out a list of matters which should be reported where there is actual or genuinely suspected behaviours. This behaviour could arise within BOOM or any of its subsidiaries.

## Who can employees talk to?

If you believe someone is breaking the law, breaching BOOM's Policies and Charters, Code of Conduct, has been involved in fraudulent or corrupt behaviour, then you should:

- take the matter up with your immediate manager; or
- report the matter to:
  - ▶ the General Manager, HR & Industrial Relations (Elaine Buchanan, on 08 9410 8500); or
  - ▶ BOOM's Whistleblower Protection Officer (Reuben David, on 03 9207 2507).
- report the matter to Stopline, BOOM's external service provider, through their confidential third party Whistleblower Communication service. See Appendix A for methods of reporting available through Stopline.
- if the matter concerns the Managing Director or a director of the company, it should be raised directly with the Chair of the Audit and Risk Committee (Mr Damian Banks on (03) 9207 2500)).

You may at any stage skip a person in the chain outlined above if that person is the subject of the report or if you have another reason to believe that the person is not likely to deal with the report properly.

You may also wish to disclose your matter to a legal practitioner if you wish to obtain legal advice, or externally to ASIC, APRA, or the Australian Federal Police. Reports can be made in person, in writing or by email. The confidentiality of those reporting incidents, including internal fraud, will be protected through measures that focus on confidentiality and discouraging victimisation or reprisals.

While reports can be made anonymously if preferred, this may affect the ability to investigate the matter properly and to communicate with you about your report. The Company may not be able to undertake an investigation or update you on the status if contact details are not provided. For this reason, we encourage anonymous individuals to maintain ongoing two-way communication (such as by using an anonymous email address), so that we can ask follow-up questions or provide feedback.

## What happens when an individual reports the matter?

BOOM will investigate all reported concerns appropriately and will, where appropriate, provide feedback regarding the outcome of the investigation. BOOM will take the necessary course of action in response to the outcome of the investigation. BOOM may seek external expertise in the investigation process to ensure appropriate processes and reporting are adopted and outcomes are followed.

Anyone who discloses the identity of those who speak up who wishes to remain anonymous (or information that could disclose the identity) faces a civil or criminal penalty.

## What happens to the individual speaking up?

BOOM will ensure that adequate and appropriate support and protection is provided for those who speak up including protecting identity and any information received is held in confidence unless consent is given or required by law. If you are an employee, the Company's Employee Assistance Program (EAP) remains available, should you require support.

Where a disclosure qualifies for protection under relevant law, the individual will be protected from liability (and disciplinary action) for making the disclosure. BOOM will take whatever action is possible consistently with this Policy to make sure you are not personally disadvantaged for making your report, whether by dismissal, demotion, any form of harassment, discrimination or any form of current or future bias.

If you claim to have been the subject of any such action as a consequence of making your report, and the matter cannot be resolved with you by management, the matter will be referred to the Whistleblower Protection Officer (WPO, currently the Company Secretary and Chief Legal Officer). The WPO is responsible for the protection of disclosing individuals.

Speaking up is not about raising grievances or making false reports against employees. It is about reporting alleged breaches. Where it is determined the employee speaking up has not acted in good faith or has made false reports, then disciplinary action will be taken (and may include termination of employment).

### **When does this Policy not apply?**

It is not appropriate to disclose matters relating to personal work-related grievances, or where an employee is undergoing a performance improvement process and management action is carried out in a reasonable manner. Examples of reasonable management action are listed in Appendix A.

### **Dealing with conflicts of interest**

A conflict of interest may arise when personal, financial, and business or other interests might affect, or be seen to affect, the way an employee performs their duties. BOOM recognises the impact that conflicts of interest can have and therefore intends to be transparent with all transactions that occur.

BOOM guidelines are as follows:

- employees should avoid participating in any business activity outside of BOOM that may conflict with their duties within the Company;
- employees should not accept gifts which could be seen as a past, present or future conflict of interest in carrying out their duties; and
- if an employee is faced with a possible conflict of interest, the conflict should be declared, the circumstances discussed with their General Manager or other senior executive, and action taken to avoid any real or perceived conflict of interest.

### **Who can provide me with more information on the policy?**

If you have any questions about this Policy or concerns about possible breaches or any other queries regarding this Policy, please contact:

- BOOM's Whistleblower Protection Officer (Reuben David, Company Secretary and Chief Legal Officer, on 03 9207 2507); or
- the General Manager, HR & Industrial Relations (Elaine Buchanan, 08 9410 8500).

This Policy is consistent with the requirements of the Corporations Act 2001 (Cth). Employees can obtain more information in this regard at <http://www.asic.gov.au/>.

### **Review and approval**

The Company will periodically review this Policy to ensure that it is operating effectively and whether any changes are required.

This Policy was approved and adopted by the Board on 18 March 2026.

## Appendix A

### Stopline (Third Party Whistleblower Service)

You can report concerns through the following Stopline methods:

- Online – <https://boomlogistics.stoplinereport.com>
- Email – [makeareport@stopline.com](mailto:makeareport@stopline.com)
- Phone – 1300 30 45 50

Stopline will handle all procedures for dealing with disclosures received and investigated. They will act impartially and objectively without any conflict of interest and to keep BOOM's Audit, Risk and Compliance Committee advised of the progress and outcome of the investigation.

### Examples of matters which should be reported under the Speaking Up Policy

All employees are encouraged to report any matters or behaviours that they genuinely believe breach BOOM's Company Charter and Policies, Ethical Standards or the law or is believed to be fraudulent or corrupt behaviour.

The following is a list of matters which should be reported where there are actual or genuinely suspected behaviours:

- conduct which is illegal or breaks the law, including any collusion and anti-competitive conduct laws, company law, and accounting practices.
- misconduct, or an improper state of affairs or circumstances.
- breach of BOOM Policies and Charters, including our Health, Safety and Environment Policies, and Securities Trading Policy.
- threatening a person who has made a disclosure, or plans to make one.
- \*theft, fraud or misuse/misappropriation of assets.
- corrupt conduct and activities (including accepting or providing a bribe).
- unfair or unethical dealing with a customer.
- represents a danger to the public or the financial system.
- purposely damaging company plant and equipment.
- bullying or harassment.
- abuse of authority.

\*For more examples of fraud please refer to the "*Fraud Risk Management Policy*". BOOM's policies are available at: [www.boomlogistics.com.au/about-us/corporate-governance/](http://www.boomlogistics.com.au/about-us/corporate-governance/)

### What is Reasonable Management Action?

The following are examples of reasonable management action, and thus not protected by this Policy:

- personal work-related grievances (such as conflicts with colleagues, or a lack of promotion).
- performance appraisals.
- ongoing meetings to address underperformance.
- counselling or disciplining a worker for misconduct.
- modifying a worker's duties including by transferring or re-deploying the worker investigating alleged misconduct.
- denying a worker a benefit in relation to their employment.
- refusing an employee permission to return to work due to a medical condition.