

Version number 3

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Functional area Legal and Secretariat

1 Overview

As a business, Boral and its related entities ("**Boral Group**") is committed to observing and complying with all of its legal obligations. An integral part of this commitment is to behave in an honest and ethical way when dealing with our customers, suppliers, consumers and competitors. All employees and representatives of the Boral Group are expected to comply strictly with competition laws including the Competition and Consumer Act 2010 (Cth) ("**CCA**") in Australia. Very substantial penalties can be imposed on companies and individuals for contravention of competition laws.

2 Purpose and Scope

This policy provides a summary of the obligations of both the Boral Group and each of its employees under the CCA. It also sets out the commitments of the Boral Group in supporting compliance with these obligations.

This policy applies to all Boral Group employees, officers, agents and contractors ("**Personnel**"). It should be read in conjunction with Boral's Code of Business Conduct, Conflicts of Interest Policy and Whistleblower Policy.

3 Commitment and Obligations

Boral Group's commitment

The Boral Group's commitment is to give its officers and employees appropriate resources such as systems, training and support to enable them to meet their legal obligations and to prevent liability, loss or damage to consumers, themselves and Boral.

The key training programs comprise an online training module for all relevant employees, with an additional face-to-face (or virtual) training session for those employees with customer or supplier facing roles. These programs are of value in supporting employees' understanding of the applicable law and the obligations of companies and individuals.

The Boral Group will not tolerate noncompliance with the CCA and breaches of this policy will be regarded with the utmost seriousness. Offenders may be subject to disciplinary action, including dismissal from employment, where appropriate.

Obligations of Boral Group Personnel

It is the responsibility of all Boral Group Personnel to comply with the following obligations:

- Make proper use of the systems and other supporting materials provided by the business from time to time to meet their legal obligations and avoid liability and loss to the business and themselves;
- Keep their working knowledge of the CCA up to date including completing all training provided. Online training must be completed by all new employees within 1 month of commencing in relevant roles, with refresher training completed at least every 2 years;
- Report customer complaints and disputes through the appropriate channels and systems;
- Strictly comply with the prohibitions on anti-competitive conduct and unfair practices outlined below; and
- If they become aware of anything which may raise a competition law concern, whether due to the conduct of a Boral employee or any other person (including a customer, supplier or other third party) they must promptly advise their manager who must advise a member of the Boral legal team.

4 Prohibitions on Anti-Competitive Conduct

The CCA prohibits a range of anti-competitive conduct relevant to the Boral Group's dealings with our competitors, suppliers, partners, customers and others.

In particular, Boral Group Personnel must NOT contravene the following prohibitions:

- Do NOT reach an agreement, arrangement or understanding with any Boral Group competitors to:
 - fix, control or maintain prices (including components of prices such as margins or rebates);
 - share or allocate customers, suppliers or geographic territory;
 - coordinate on or rig tenders or bids;
 - restrict or limit the production, supply or acquisition of goods or services; or
 - boycott customers, suppliers or other competitors.
- Do NOT specify a minimum or specific resale price where goods are supplied to a reseller;
- Do NOT impose restrictions on the ability of a supplier or customer to deal with others or require them to acquire goods or services from a particular third party where the restriction or requirement is for the purpose or will have the effect or likely effect of substantially lessening competition; and
- Do NOT engage in any conduct that is for the purpose or will have the effect or likely effect of substantially lessening competition in any market in which the Boral Group operates (or may in future operate) if the Boral Group has a substantial degree of market power.

5 Prohibitions on Unfair Conduct

The CCA prohibits a range of unfair practices covering the Boral Group's dealings with suppliers, partners, customers and the general public. In particular, Boral Group Personnel must not contravene the following prohibitions:

- Do NOT make misleading or deceptive representations or omissions or otherwise engage in misleading or deceptive conduct.
- Do NOT engage in unconscionable conduct (i.e. conduct that is beyond reasonable commercial dealings and not in good conscience) - this particularly applies to dealings with anyone who is disadvantaged or in a significantly weaker bargaining position.
- Do NOT include an unfair term in a standard form (non-negotiated) contract with a small business (i.e. with up to 100 employees or annual turnover up to \$10 million) or a consumer. A term will be unfair if it causes significant imbalance in the parties' rights and obligations, is not reasonably necessary to protect the Boral Group's legitimate interests and would cause financial or other detriment to the small business/consumer if the Boral Group were to rely on the term.
- Do NOT breach the consumer guarantees and express warranties in the CCA in relation to the supply of goods and services to consumers.

6 Reporting concerns

The Boral legal team will monitor performance against this policy through our management systems.

Boral Group Personnel who do not feel comfortable reporting a concern directly to their manager are encouraged to speak up to a member of the Boral legal team or to the externally administered Stopline online portal on the details below.

The Stopline online portal can be contacted 24 hours a day, 7 days a week. Reports can be made through this link <https://boral.stoplinereport.com>. No employee who raises a matter of concern will suffer any recrimination for doing so.



Vik Bansal
CEO and Managing Director

Competition and Consumer Law Policy

Policy Version History

This table documents the five most recent key policy updates.

No.	Definition	Comments / Key changes	Next review
2		Transferred to new template.	December 2024
3		Amended to incorporate new reporting lines and to update references to unfair practices and penalties.	May 2026

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