

<b>Version number</b>	4	<b>Implementation date</b>	February 2024
<b>Policy author</b>	Sam Blunden Jean-Paul Wallace	<b>Policy approver</b>	Boral Board of Directors
<b>Functional area</b>	Secretariat		

## 1 Introduction

Boral Limited (Boral) is committed to providing shareholders and the market with full and timely information about its activities in compliance with its continuous disclosure obligations under the ASX Listing Rules.

## 2 Purpose

The purpose of this policy is to assist employees, particularly executives, officers and managers, to understand Boral's continuous disclosure obligations and to set out the procedures that must be followed for the release of information to the ASX, the investment community, the media and the public.

It is important that all employees with access to information which may have a material effect on the price or value of Boral's securities read, understand and abide by this policy.

## 3 Continuous Disclosure Obligation

ASX Listing Rules require that if Boral becomes aware of any information that a reasonable person would expect to have a material effect on the price or value of its securities, it must immediately (meaning promptly and without delay) disclose that information to the ASX.

Further information on the conditions where disclosure to ASX and the market is not required are detailed under ASX's Listing Rule 3.1.

## 4 Information for all Boral staff

### Employee Becoming Aware of Information

Where an employee becomes aware of information which is not generally available and which the employee believes may have a material effect on the price or value of Boral's securities, the employee must immediately inform their Executive General Manager of this information.

Even if you are not sure, it is still best to immediately report the information to your Executive General Manager to consider the matter.

A useful test is to ask yourself these two questions:

- (a) Would this information influence my decision to buy or sell Boral securities now?
- (b) Would I feel as if I were "insider trading" if I were to buy or sell Board securities now while I am aware of this information that has not been released to the market?

If the answer to either question is 'yes' then the information may be market sensitive and should be reported to your Executive General Manager. Executive General Managers will report the information to the Chief Executive Officer (CEO).

## 5 Disclosure Process

The following procedures are to be followed when any information concerning Boral is being considered for disclosure to the ASX:

- (a) The information is to be reviewed by the CEO who will consult with the Board Chairman and directors as appropriate.
- (b) The Board will determine whether or not Boral's continuous disclosure obligations may require the information to be disclosed to the ASX.

(c) Announcements relating to significant matters such as:

- Half-Year or Full-Year Financial Results
- Dividend determinations or declarations
- Guidance to the market
- Major acquisitions or divestments; or
- Other corporate matters which involve significant financial or reputational risk

will be referred to the Board for approval.

There may be circumstances where it is impractical to consult the whole Board (having regard to Boral's continuous disclosure obligations). In such cases, approval can be given by any two of the following directors: the CEO, the Board Chairman, and the Chairman of the Audit & Risk Committee.

- (d) Boral is to immediately disclose the information to the ASX when it is determined that in accordance with the policy the continuous disclosure obligations require such disclosure.
- (e) The filing of administrative announcements with the ASX (referred to in appendix A), where the underlying information (referred to in column 1) has been previously approved by the Board, has been delegated to the General Counsel & Company Secretary, but is subject to the prior notification set out in column 3, in appendix A).
- (f) All information which is disclosed to the ASX will to be placed on Boral's website immediately following confirmation from the ASX of receipt of the disclosure.

## 6 Briefings and Presentations

Information provided at briefings and presentations is subject to the continuous disclosure obligations. The following procedures are to be followed in relation to briefings and presentations:

- material to be presented at a briefing/presentation is to be provided in advance to the Company Secretary to enable consideration to be given by the Board as to whether any disclosure to the ASX is required;
- where practicable, a briefing/presentation should be attended by at least two Company representatives. Where this is not possible, the person making the briefing/presentation is required to keep an appropriate file note or other record of proceedings;
- care must be taken in answering questions at the briefing/presentation to ensure that there is no disclosure of price sensitive information which has not been previously disclosed to the ASX. A question raised at the briefing should not be answered if it would result in the disclosure of price sensitive information.

## 7 Rumours and Market Speculation

Subject to its obligations under the ASX Listing Rules, Boral will not generally comment on rumours or market speculation. The CEO shall consult with the Board Chairman, and if necessary, the Board, in relation to potentially material rumours or market speculation.

## 8 Inadvertent Disclosure

If an employee becomes aware of price sensitive information which has been leaked or inadvertently disclosed, the CEO or Company Secretary must be informed so consideration can be given by the Board as to whether disclosure to the ASX is required.

## 9 Trading Halts or Voluntary Suspensions

In exceptional circumstances, it may be necessary for Boral to request a trading halt or suspension from the ASX. The CEO in consultation with the General Counsel will determine if a trading halt or suspension may be required. Prior to trading halts or voluntary suspensions, the Board Chairman will be consulted on such matters, or if unavailable, the Board Chairman of the Audit & Risk Committee will be consulted.

In the event the CEO is unavailable, the General Counsel will consult with the Board Chairman to determine if a trading halt or voluntary suspension is required.



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# Continuous Disclosure Policy

## 10 Breach of this Policy

If Boral contravenes its continuous disclosure obligations, offences attracting criminal and/or civil penalties under the Corporations Act 2001 may be committed by the Company and persons involved in the contravention. Breaches of this policy will be regarded with the utmost seriousness and will be subject to disciplinary action, including dismissal from employment, where appropriate.

Breaches of this Policy may be regarded as misconduct, which may lead to disciplinary action including termination of employment or engagement.

## 11 Additional Information

If you have any questions arising from this Continuous Disclosure Policy, please contact the Company Secretary or the Deputy Company Secretary.

## 12 Policy Review

The Policy is owned by the Boral Board and shall be reviewed at least once every two years.

The Board delegate authority to the Company Secretary (or their delegate) to make administrative changes (including branding and position titles).

### Policy Version History

This table documents the five most recent key policy updates.

No.	Definition	Comments / Key changes	Next review
4		<ul style="list-style-type: none"><li>• Further guidance on when to report information</li><li>• Further information to release processes</li><li>• Identify Boral's spokespersons</li><li>• Introduce administrative announcement release authority</li></ul>	January 2026

## 13 Appendix A: Administrative ASX Announcement

The below ASX announcements do not require approval by the Board.

Note: Approval on the issue, conversion, payment or cessation of securities continues to require Board approval, it is the associated announcement of this approval which will not require Board approval.

Column 1	Column 2	Column 3
Nature/type of market announcement	Approver	Prior notification of upcoming release
Half-Year & Full-Year Webcast details and key dates	General Counsel & Company Secretary	Nil
Applying for quotation of securities, notifying a proposed issue of securities, and notifying an issue, conversion or payment up of equity securities (Appendix 2A, 3B and 3G)	General Counsel & Company Secretary	<ul style="list-style-type: none"> <li>• CEO</li> <li>• Board Chairman</li> </ul>
Notification of cessation of securities (Appendix 3H)	General Counsel & Company Secretary	<ul style="list-style-type: none"> <li>• CEO</li> <li>• Board Chairman</li> </ul>
Notifying initial, changes and final director's interests (Appendix 3X, Appendix 3Y, Appendix 3Z)	General Counsel & Company Secretary	<ul style="list-style-type: none"> <li>• The director to whom the announcement relates</li> <li>• CEO</li> <li>• Board Chairman</li> </ul>
Results of Meetings	General Counsel & Company Secretary	Nil

Note: Company Secretariat will continue to advise the Board when announcements have been released in accordance with ASX Corporate Governance Principles and Recommendations.

## 14 Appendix B: Communications with third parties

Boral will not disclose information determined as market sensitive to any person outside Boral until it has received confirmation the information has been released to the ASX.

Boral employees are not authorised to speak with the media, analysts, investors or other third parties unless authorised by this policy. The below persons have been approved as Authorised Spokespersons and are able to communicate with those listed below.

<b>Boral Authorised Spokesperson</b>	<b>Persons Authorised Spokespersons are authorised to communicate with</b>
Board Chairman	All persons
Directors	All persons, with prior approval from the Board Chairman
CEO	All persons
CFO	Analysts of and investors in Boral
General Counsel & Company Secretary	ASIC and ASX
Deputy Company Secretary	ASIC and ASX, with prior approval from the General Counsel & Company Secretary
Head of Brand Communication & Marketing (including FTI Consulting)	Media, with prior approval from the CEO
Head of Investor Relations	Analysts of and investors in Boral, with prior approval from the CEO and/or CFO

All communications regarding disclosures between Boral and ASX, and the actual making of disclosures by Boral to ASX, are to be conducted by the Company Secretary or an authorised representative of the Company Secretary.