
Modern Slavery Statement 2023/24¹

1 Reporting entity

This is a joint statement made by the following entities:

- Marmon Construction Services (Australia) Holdings Pty Ltd (ABN 38 154 626 954) (“**MCSA**”);
- Sterling Crane (Australia) Pty Ltd (ACN 154 672 705); and
- Freo Group Pty Ltd (“**Freo**”) (ABN 64 009 325 124),

together, these entities are referred to as “MCSA Group” (or “we”, “us” or “our”).

In addition, the below entities are directly or indirectly owned entities of the MCSA Group:

- Global Cranes Pty Ltd (ABN 62 116 217 639);
- WGC Crane Group Pty Ltd (“**WGC**”) (ABN 30 002 091 287);
- Marmon Crane Australia Pty Ltd (“**Marmon**”)
- NSW Cranes Pty Ltd (46 625 563 868); and
- United Crane Hire Pty Ltd (ABN 49 093 547 712).

2 Structure, operations and supply chains

Our structure and operations

MCSA is a holding company registered and domiciled in Australia. All entities within the MCSA Group are private limited companies. The only customer-facing operating entities in the MCSA Group are Freo and WGC.

Both Freo and WGC operate in the same industry: the supply of crane services and related labour and ancillary services to the mining, oil & gas, construction, renewable energy and infrastructure sectors across Australia. They collectively employ around 1000+ people, across 22 branches, in six States and Territories throughout Australia.

Our supply chains

The MCSA Group has a consolidated supply chain. As at the end of this reporting period, our supply chain is comprised of approximately 1,400-1,600 suppliers. Over 95% of these suppliers are located in Australia. However, MCSA does purchase cranes from foreign manufacturers that are represented by local agents or subsidiaries here in Australia. We include further details on our supply chain footprint in section 3.

3 Modern Slavery risks in operations and supply chain

Modern slavery describes ‘situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom’ (“**Modern Slavery**”). Consistent with the United Nations’ ‘Guiding Principles on Business and Human Rights’, we understand Modern Slavery risks to mean the risk that we may ‘cause’, ‘contribute to’, or be ‘directly linked to’ modern slavery and we have considered our risk profile from this perspective.

Cause and contribute

We recognise that there are risks of Modern Slavery that may directly result from our own employment practices. For example, through the potential underpayment or non-payment of wages or salaries.

There are also situations where there is a risk that we may contribute to Modern Slavery practices. For example, if we set unreasonable expectations on our suppliers with respect to the prices of rigging equipment and this leads them to engaging in Modern Slavery practices to meet these cost pressures.

The MCSA Group ensures the following in its dealing with employees and candidates for employment:

- we do not charge registration fees to be part of our employee database or to be considered for employment with us;
- we do not hold or retain passports or other identity documents on behalf of employees;
- all employees are covered under a registered Enterprise Bargaining Agreement or individual contract of employment that is consistent with Fair Work guidelines and National Employment Standards;
- all new employee information packs include the Fair Work Information Statement or Casual Employment Information Statement as applicable;
- we do not ask for demographic information such as gender, ethnic background, religious beliefs, political affiliation, sexual orientation or age during the recruiting or onboarding process;
- where accommodation is supplied to our employees as part of their employment, this accommodation is safe, clean and of a good standard;
- we do not allow the employment of children in any circumstances;
- we provide training to our staff and managers on legal and appropriate hiring practices, including interview techniques; and
- we conduct periodic audits on our payroll system to detect errors or incidences of incorrect payments of wages and salaries.

Our current assessment of the risk of Modern Slavery existing within our own business operations is 'low'. This risk is, at a minimum, reviewed annually (along with other risks on our risk register) and is updated as necessary.

We consider the policies, procedures and processes outlined above and in section 4 of this statement to be adequate controls to address the risk of causing or contributing to Modern Slavery in our operations.

Directly linked

We understand there are situations where there are risks that we may be directly linked to Modern Slavery practices through our association with another business. For example, where a supplier of our supplier (or downstream in the supply chain) engages in or is indirectly exposed to Modern Slavery practices. Understanding our supply chain is central to understanding our risk of being directly linked to potential Modern Slavery practices.

We deal with many diverse suppliers who supply a wide variety of items to us and other consumers (for example, stationery, clothing or protective equipment).

Over 99% of MCSA Group's suppliers are located in Australia. Some of these suppliers may purchase cranes from foreign manufacturers that are represented by local agents or subsidiaries located in Australia.

An initial risk analysis was performed in 2020, which has subsequently been reperformed, and no material changes to our assessment have arisen. We have also worked with the Property Council Australia and a consortium of similar businesses to develop the Informed 365 platform. To do so, we have shared supplier details and information to assess risks relating to suppliers. This has assisted in informing our risk categorisation. We have discussed this in further detail in section 4 below.

Where the responses to the questionnaire or other indicators suggested that there was a higher risk of Modern Slavery being present with a particular supplier's supply chain, or where we were not able to determine a level of risk based on the responses, we reached out to representatives of the supplier and met with them to discuss our concerns.

Suppliers were classified into the following categories:

OEM suppliers

These are suppliers that manufacture the main products we utilise to generate revenue within our business: cranes and associated lifting equipment. Our spend with these key suppliers accounts for approximately 15 to 25% of our total purchases, and for that reason, we continue to consider OEM suppliers as possessing a medium risk. This is also due to the fact that these suppliers generally manufacture overseas.

Senior executives from the MCSA Group met with senior executives at each of our OEM suppliers and discussed their views and attitudes towards Modern Slavery. Where available, we also reviewed their Modern Slavery statements, policies, and other documents.

Conclusion: As a result of this annual process, we were satisfied that the controls in place by our OEM suppliers acted as adequate and proportionate safeguards to mitigate the risk of Modern Slavery practices arising within this aspect of our supply chain.

We will continue to engage with OEM suppliers to assess our Modern Slavery risk profile each year, or more frequently if circumstances require.

High value purchases

These are entities such as suppliers of automotive components; fuel, rigging equipment, transport and logistics, automotive repairs and servicing and insurance. There are approximately 100-150 suppliers in this category accounting for 20-40% of total purchases.

Similarly, these suppliers were all sent a risk assessment questionnaire and the responses were analysed.

Conclusion: The risk of Modern Slavery was determined to be low. However, this is continually monitored through our supplier onboarding process and subsequent review process.

These suppliers will remain subject to ongoing annual assessments.

Suppliers of IT equipment and services; food, beverage and catering; and cleaning suppliers

Whilst not a significant value of spend, nor a particularly high volume of purchases, this category of suppliers contains certain higher risk products as determined by the G20 in the Global Slavery Index ("GSI"), including electronics, garments, palm oil, solar panels and textiles.

With respect to these categories, the organisation only deals with top-tier providers of equipment, such as national companies that have established and documented Modern Slavery procedures and can

highlight, with examples, how they address the potential impacts of Modern Slavery on their supply chain.

Conclusion: We consider there to be a low risk that elements of Modern Slavery exist in this area of our supply chain.

These suppliers will remain subject to periodic assessments, with new suppliers needing to complete our Modern Slavery questionnaires.

General suppliers

These are the remaining balance of our suppliers who do not fit into the other categories. We have roughly 700 general suppliers that account for approximately 30-40% of total purchases. This includes several hundred suppliers with an annual spending of less than \$20,000. These suppliers are based in Australia, classified as a low-risk area in the GSI. We have a process to send, collect and assess the risk assessment questionnaires back from each of these suppliers.

Conclusion: The risk of Modern Slavery existing in this aspect of our supply chain is deemed minimal, based on responses from suppliers, and to-date, no red flags have been identified with suppliers within this category.

4 Actions taken to address risks

In addition to the supplier engagement and due diligence processes described above, we have taken the following actions to address risks:

Firstly, we have a suite of policies and procedures that assist in mitigating modern slavery risks and educate employees and suppliers about Modern Slavery and broader human rights risks in our supply chains and our operations (described below).

The MCSA Group complies with all Australian laws and regulations in relation to the treatment of its employees and believes in equality for all workers regardless of age, gender, race, religious beliefs, sexual orientation or other personal traits. These practices are set out in the MCSA Group's *Human Rights, Ethics and Compliance* procedure and this procedure governs all entities within the MCSA Group. We often share our *Human Rights, Ethics and Compliance* procedure with our clients. Since the inception of our modern slavery programme, we now provide new suppliers with this policy and have provided a copy to all OEM and high-purchase value suppliers.

In addition, the MCSA Group has other policies and procedures which complement the *Human Rights, Ethics and Compliance* procedure, including, but not limited to, the following:

- *Diversity and Inclusion Policy*
- *Indigenous Engagement Management Plan*
- *Community & Indigenous Engagement Management Plan*
- *Social Responsibility Management Plan*
- *Employee Relations Policy*
- *Code of Conduct*
- *Workplace Bullying and Harassment Procedure*
- *HSE Management Plan*

- *Marmon Policies 1 and 2* (parent policies that all employees must adhere to and acknowledge via annual declaration)

Moreover, our ultimate parent, Berkshire Hathaway, Inc., provides an annual communication to every employee setting out Berkshire Hathaway's view on ethics and compliance. Part of this communication includes a "hotline" that can be contacted by tollfree phone or email to report suspected breaches of laws or regulations or any unethical behaviour. Any hotline report is thoroughly investigated by Marmon's corporate offices and includes an independent third-party review.

MCSA Group believes that these policies, procedures and processes, working together, minimise and mitigate any risk of Modern Slavery existing within our operations and/or supply chain.

Secondly, we are part of a consortium of similar businesses in Australia who have implemented Informed 365, a software-based solution to obtain information and intelligence from elements of our supply chain. The software facilitates the sending of a detailed questionnaire to all suppliers to collect and collate responses used to create a risk rating for each supplier. This information is shared across common suppliers in the consortium and, by working together with like-minded organisations, allows us to better educate our supplier network and reduce or eliminate elements of Modern Slavery.

Thirdly, we continue to keep ourselves apprised of significant developments in Australia's Modern Slavery compliance space. This includes through our attendance at webinars, reading guidance notes and other information (as it is made available through the Australian Border Force) and through our consultations with professional service firms such as lawyers and accountants.

Finally, MCSA Group's compliance with the *Modern Slavery Act 2018* (Cth) is managed and overseen by a senior member of the MCSA Group executive, who is also a director of the Group.

Where we suspect that a supplier may be engaged in or indirectly exposed to elements of Modern Slavery, we will address these concerns with the supplier in question. If they cannot provide satisfactory evidence to allay our concerns, then we will cease purchasing from this supplier immediately. To date, no evidence has been noted that has required this action to be taken.

5 Assessment of effectiveness of actions

We are committed to the continued improvement of our efforts to assess and address Modern Slavery risks across our business operations and supply chain. This has included a number of improvement initiatives to strengthen our detection and preventative measures in this space, such as:

- database of responses by our suppliers to Modern Slavery questionnaires and risk assessments;
- internal discussions between key areas of MCSA Group, such as Procurement, Legal and Human Resources to allow for regular engagement and feedback;
- internal audits of our prequalification checks for suppliers; and
- annual review of our internal policies and procedures.

We are also assessing ways to monitor the high-risk suppliers we have engaged, to develop and monitor Modern Slavery training sessions for our staff; and to review of the number of grievances and reports received and resolved to analyse any potential trends;

6 Process of consultation with other entities controlled by this entity

Each of the reporting entities covered by this statement, as well as the other entities owned or controlled by them that form part of the MCSA Group:

- have common directors;
- report to the same senior executive team; and
- share centralised administration and support functions and use the same policies and processes.

This preparation of this statement, and the MCSA Group's actions throughout the reporting period with respect to Modern Slavery were made at the Board level, ensuring consultation with each MCSA for the reasons set out above.

7 Other information

Continuous improvement

The commentary included throughout this statement indicates the steps we have taken to improve and enhance our efforts to assess and address the risks of Modern Slavery in connection with our operations and supply chain. As we look forward to continuing to improve our actions, we have set out the below goals:

- establishing a risk profile matrix to ensure independent ongoing review of our Modern Slavery risks;
- tailored training to select employees involved in procurement and supplier engagement;
- ongoing review of supplier terms and conditions; and
- opportunities to strengthen our practices with peer reviews of similar companies' approaches to Modern Slavery.

Approval of this statement

This statement is approved for release by the Board of Directors of MCSA as the parent entity of each of the reporting entities. The Board of Directors for each member of the MCSA Group is comprised of the same directors.

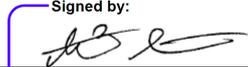
This statement was approved on December 23, 2025.

Signed for and on behalf of

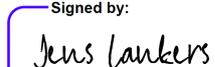
Marmon Construction Services (Australia) Holdings Pty Ltd ABN 38 154 626 954

Signed by:


Brian Adams - Director

Signed by:


Adam Benca - Director

Signed by:


Jens Lankers - Director