



Crown Equipment Pty Ltd
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Crown Equipment Pty Limited
Modern Slavery Statement
2023/2024

1. Introduction

Crown Equipment Pty Limited recognises that preventing and addressing modern slavery risks in its operations and supply chain requires long-term planning and vigilance. It also requires an integrated cross-functional approach that should be embedded across the organisation. Internal and external partnerships are vital to address potential involvement in modern slavery, as well as to achieve international and domestic policy coherence.

The compilation of Annual Modern Slavery Statements for Crown Equipment Pty Limited, continue to highlight opportunities for improvement in this critical area. Crown Equipment Pty Limited continues to focus its efforts in employee training on modern slavery for employees in a number of connected roles, prioritising those managing higher risk categories and involved in supplier engagement to ensure we have an adequately informed workforce. The framework provided via the implementation of an internal Modern Slavery Compliance Policy as well as an outward facing Anti-Slavery Policy in a previous reporting period, continues to be built upon, with increased employee and supplier awareness of modern slavery practices, and demonstration of a collective commitment to not cause, contribute to, or be directly linked to, practices of modern slavery.

Surveying, collating, reporting and analysing capabilities have continued to be enhanced during the 2023/2024 Reporting Period, with more data available than in previous years. The Company continues to engage third-party support in the compilation of supplier questionnaires for onboarding vendors, and for use in annual audits of suppliers. These questionnaires continue to assist in the identification of high-risk commodities and suppliers and enable improvements where required, as well as provide data for analytics and mapping. Crown Equipment Pty Limited has an ongoing commitment to improving its due diligence for non-trade suppliers based on category risk segmentation.

This Statement has been prepared with the intention to comply with the reporting criteria of the *Modern Slavery Act 2018*. Consistent with this intention, the below table sets out where the report seeks to address each criterion.

| Modern Slavery Act 2018 Criteria | Statement Section(s) | Statement Page(s) |
|---|-----------------------------|--------------------------|
| Identify the reporting entity | 2 | 3 to 4 |
| Describe the reporting entity’s structure and operations and supply chains | 2 and 3 | 3 to 6 |
| Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls | 4 | 7 to 12 |
| Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes | 4 and 5 | 7 to 14 |
| Describe how the reporting entity assesses the effectiveness of these actions | 6 | 15 |
| Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement) | 7 | 16 |
| Provide any other relevant information | 1 and 8 | 2 and 17 |

2. The Reporting Entity

Crown Equipment Pty Limited (ACN 000 514 858) (“the Company”) is an Australian Private Company wholly owned by the Crown Equipment Corporation headquartered in New Bremen, Ohio in the United States of America (“the Corporation”). The Corporation maintains a presence in 80 countries and 500 locations globally and designs and manufactures material handling equipment and solutions. The Corporation’s material handling solutions are used in a wide variety of applications, such as transporting goods through the narrow aisles of warehouses, distribution centres and manufacturing facilities, as well as in agriculture and mining.

The Company has maintained operations in Australia since 1966 and operates from its registered office located at 15 Cooper Street, Smithfield, New South Wales 2164, with its primary operations being the selling, renting and servicing of material handling equipment, and the provision and sale of parts, components and consumables associated with this equipment.

For the 2023/2024 Reporting Period from 1 April 2023 to 31 March 2024, the Company directly employed and managed an average of 962 employees from its Australia Head Office and its branch network located in all states and territories of Australia. Most of the employees of the Company are directly engaged in the sales, rental and service of material handling equipment across almost all sectors and industries and covering all regions of Australia. Those employees that are not directly engaged in the sales, rental and service of material handling equipment, are employed in support roles or corporate support and services roles, that serve to support the Company’s operations and facilitate the work of those employees that are directly engaged in the sales, rental and service of material handling equipment.

The Company maintains branded facilities in:

- Acacia Ridge (Brisbane), Queensland
- Beresfield (Newcastle), New South Wales
- Berrimah (Darwin), Northern Territory
- Bohle (Townsville), Queensland
- Davenport (Bunbury), Western Australia
- Derwent Park (Hobart), Tasmania
- Hume (Canberra), Australian Capital Territory
- Mulgrave (Melbourne), Victoria
- Orange, New South Wales
- Paget (Mackay), Queensland
- Portsmith (Cairns), Queensland
- Smithfield (Sydney), New South Wales
- St Leonards (Launceston), Tasmania
- Toowoomba, Queensland
- Truganina (Melbourne), Victoria
- Tweed Heads South (Gold Coast), New South Wales
- Unanderra (Wollongong), New South Wales
- Welshpool (Perth), Western Australia
- Wingfield (Adelaide), South Australia
- Wodonga (Albury/Wodonga), Victoria

The branch network provides sales, rentals and service support to customers within the geographical areas for which the individual branch holds responsibility. Branch Managers are

accountable for the Company's operations carried out from their respective branches, and report to the respective General Manager Branch Operations. Regional Branch Managers, e.g., Townsville, Wollongong, etc., report to the respective General Manager Branch Operations based at the main branch of their state, e.g., Brisbane, Sydney, etc., with the General Managers Branch Operations reporting into the Company's Australian Head Office.

The Company also engages in sales and service in Papua New Guinea, with these operations managed out of the Company's locations in Queensland, Australia.

During the 2023/2024 Reporting Period, the Company maintained a commercial relationship with an independent reseller that purchases and sells the products and services of the Company. The trading name of the entity is AH Sales (ABN 27 791 913 851) in Rockhampton, Queensland.

Although the Company does not own or control these entities, the executive hub which supports the Corporation's operations in New Zealand and Southeast Asia (Singapore, Malaysia, Thailand, Indonesia, Vietnam, Philippines and Republic of Korea) is located in the Company's Australia Head Office.

Commonly known in the marketplace as 'Crown Lift Trucks', during the 2023/2024 Reporting Period, the Company has continued to wholly own Crown Lift Trucks Australia Pty Ltd (ACN 648 829 869) and maintain ownership of several dormant business names, being: Crown Warehouse Solutions, Crown Equipment Leasing, Crown Forklifts, Crown Lift Trucks, Crown Credit, Crown Fleet Management and Crown Lift Truck Rentals. Some of these business names are departments within the Company and are not standalone trading entities.

3. Supply Chains

For the 2023/2024 Reporting Period, the Company had 1358 direct suppliers globally, of which 1351 are vendors located in Australia.

Wherever possible, Procurement is a centrally managed function within the Company's Head Office. A critical aim of the Procurement process is to build long-term business relationships with a range of quality suppliers. This is intended to ensure that the Company receives goods and services to required specifications, quality, service, delivery and reliability; and to deliver value for money and reduce the Company's risk exposure.

Procurement works in collaboration with the Company's business units to determine the requirements of each business unit for goods and/or services. The Procurement function ensures that processes are followed including: the identification and management of suppliers; the maintenance of standard terms and agreements; the conducting of competitive bid and tender processes; and, the undertaking of supplier negotiations.

The Supplier Approval process sees prospective suppliers evaluated and approved before they can supply any goods and/or services to the Company. The Company assess each supplier based on the following criteria: capabilities in meeting the Company's technical standards and/or business requirements; competitive pricing based on total acquisition cost; business structure and financial position; level and quality of systems in place; health, safety and environment policies and management; and, compliance with the Corporation's global compliance requirements, including vetting via the Corporation-developed program GTS screening, which screens prospective entities that may be embargoed for activities such as sanctioning or supporting terrorism, or for geographical or political reasons.

Supplier Management is undertaken by the Procurement department. The Procurement department seeks to ensure that the Company's risks are minimised via processes including: application of standard terms of trade and supply agreements; control of approved suppliers; regular reporting and reviews; and, the application of ethical business conduct in accordance with the policies of the Company and the Corporation.

Purchasing is an activity conducted throughout the Company to meet day-to-day requirements. The centralised Purchasing department manages the ordering of inventory, while all business units will purchase non-inventory items to meet their operating needs.

The predominant goods and services procured by the Company are material handling equipment products, such as gas, electric and internal combustion lift trucks, batteries and chargers, and industrial cleaning machines such as sweepers. The Company also procures tools, parts, components and consumables utilised in preventative maintenance of material handling equipment, major servicing of material handling equipment, and the refurbishment of material handling equipment, including high volume parts such as wheels and tyres, and high-volume consumables such as lubricants and oils. The Company also procures goods and services in the form of transport and delivery services; freight forwarding; uniform supply; Personal Protective Equipment (PPE); labour hire employment services; security services; travel services; accommodation; printing, marketing, advertising and communications services; commercial cleaning services; office furniture and office supplies; commercial real estate and property services; industrial safety supplies; garbage and recycling services; motor vehicles and fleet management services; information technology services; electronic hardware and accessories; storage solutions; telecommunication hardware and services; and, utilities.

The primary supplier of goods and services to the Company is the Corporation and its entities globally. During the 2023/2024 Reporting Period, the Corporation and its entities globally made up 31 per cent of the Company's vendor expenditure. These products are manufactured in the United States of America, Mexico, Germany and China. Local and overseas independent suppliers made up 69 percent of the Company's vendor expenditure. The products supplied by these suppliers are manufactured in Australia, China, Germany, India, Italy, Japan, Malaysia, Mexico, Philippines, Republic of Korea, Sweden, Taiwan, Thailand, United States of America and Vietnam. With current levels of transparency, the Company has an awareness of goods and services from suppliers that are manufactured in or provided from:

- Argentina
- Australia
- Bangladesh
- Belgium
- Brazil
- Bulgaria
- Canada
- China
- Fiji
- France
- Germany
- India
- Indonesia
- Italy
- Japan
- Malaysia
- Malta
- Mexico
- Philippines
- Republic of Korea
- Sweden
- Taiwan
- Thailand
- United Kingdom
- United States of America
- Vietnam

The Company recognises that safeguarding human rights across its operations and supply chains is important to its employees, shareholders, and customers.

There is both a moral and a business case for the steps we are taking to identify, report, address and ultimately eliminate any exploitation of vulnerable people with whom we may be involved, directly or indirectly, overseas or locally.

The Crown Ethical Sourcing Program supports the Purchasing Ethics Policy and Modern Slavery Compliance Policy, designed to protect and uphold worker's rights across goods and services within its supply chains.

4. Risks of Modern Slavery Practices

Organisation Risk - ‘cause’

This risk is deemed to be low. Almost all work performed on behalf of the Company is performed by employees that are employed directly by the Company under permanent employment agreements. During the 2023/2024 Reporting Period, 98.20 percent of the Company’s employees were employed on a full-time permanent basis. This lowers modern slavery risks within the Company’s direct employment arrangements. Employees are all paid over-award rates. The Company is also party to nine (9) enterprise bargaining agreements negotiated with multiple trade unions, covering a significant proportion of the Company’s total workforce.

There are very limited areas of the business that use contracted or third-party labour providers, however, where these arrangements exist, this results in less direct visibility of the terms and conditions of employment of the individual workers. Terms of business and engagement contracts with these providers often include the Modern Award classification and rates of pay of the respective employees, providing opportunity for review by the Company. The Company utilises limited providers, for several reasons, amongst which is the ability to maintain awareness of how providers are remunerating and treating their employees, and whether this is befitting an ongoing relationship with the Company.

Procurement - ‘contribute to’

This risk is deemed to be low. As noted, the Supplier Approval process sees prospective suppliers assessed against several criteria. Whilst competitive pricing is a factor, it is weighed against other critical criteria, including capabilities in meeting the Company’s technical standards and/or business requirements; business structure and financial position; level and quality of systems in place; health, safety and environment policies and management; and compliance with the Corporation’s global compliance requirements, including vetting via GTS screening.

For the 2023/2024 Reporting Period, the Company completed a high-level audit of local based and overseas suppliers to specifically aid it in identifying risks of modern slavery in its supply chains. In consideration of this, the Company does not believe that its procurement processes are contributing to, or have contributed to, modern slavery practices. Awareness of any practice, and any contribution by the Company to it, would be the subject of investigation and remediation.

Supplier Visibility - ‘directly linked to’

During the 2023/2024 Reporting Period, the Company increased its transparency into its supply chain via analysis of its local and overseas suppliers. The Company’s supply chain has been categorised in a tier system: Tier One classifies original equipment manufacturers (OEM), Tier Two classifies spare parts suppliers, Tier Three is raw material suppliers, and non-tier suppliers are a combination of entities such as facilities suppliers and contractors.

| The Company's Tier Grouping | |
|-----------------------------|---------------------------------------|
| Tier Groups | Tier Definition |
| 1 | Original Equipment Manufacturer (OEM) |
| 2 | Spare Parts & Electrical Components |
| 3 | Raw Material Suppliers |
| Non-tier | Service providers |

These suppliers must undergo an initial risk assessment that seeks to identify site-based risks associated with working conditions, along with inherent risks depending on the country in which they manufacture items.

During the 2023/2024 Reporting Period, the Company has assessed a combination of its tiered and non-tier suppliers. With the cooperation of the Company's third-party contract management software provider, the Company reached out to its local Tier One, Tier Two, Tier Three and non-tier suppliers to complete a self-assessment questionnaire (SAQ). The SAQ is intended to allow the Company to assess and identify potential areas, suppliers, or industries that present the risk of modern slavery in its supply chain.

The SAQ is designed with the intention that it will:

- support the identification of modern slavery risks;
- foster collaborative efforts between suppliers and organisations to address these risks;
- improve transparency; and
- identify areas for further due diligence.

As part of the 2023/2024 Reporting Period, the Company assessed the supplier responses to the SAQ. The Company's Tier One suppliers scored 100 per cent (an improvement on 89 per cent in the 2022/2023 Reporting Period), the Tier Two suppliers scored 75 per cent (an improvement on 67 per cent in the 2022/2023 Reporting Period), the previous non-assessed Tier Three suppliers scored 92 per cent, and non-tier suppliers scored 81 per cent (an improvement on 74 per cent in the 2022/2023 Reporting Period). The scores are based on the completion and compliance rate with the Modern Slavery Policy and processes, operations and supply chain, and working environment sections of the SAQ.

Tier Two suppliers' results have improved, however not as markedly as Tier One suppliers. Tier Three suppliers performed well in their first year, with the results for non-tier suppliers continuing to be lower than Tier One and Tier Three, with many still reporting that they did not have any policies. Notably, most are small businesses with less than 20 employees. The Company is undertaking further due diligence with eight (8) suppliers that failed to complete the SAQ in time.

During the 2024/2025 Reporting Period, the Company will follow up further with suppliers that had reported as working towards implementing policies and the suppliers that had registered as having yet to commence. In addition, the Company will continue to work with new suppliers and the suppliers that had not responded to the SAQ to ensure completion. There will be a focus on Tier Two suppliers improving to have necessary policies in place or evidence of them working towards implementing policies and procedures.

The SAQ assesses standards compliance against Crown's Purchasing Ethics Policy and Modern Slavery Compliance Policy. When the Company identifies non-conformances, suppliers must remediate these and provide supporting evidence to demonstrate they have adequately resolved the issues of concern.

Sector and Industry Risks

During the 2023/2024 Reporting Period, the Company engaged its local suppliers to complete its modern slavery survey. With the information provided, the Company can identify any risks within its supply chain network and act accordingly.

The Company reviewed its Tier One, Tier Two, Tier Three, and non-tier suppliers based on their industry category listing. 26 different industry types were identified, and within the 26 industry types, 13 industries were identified as being medium risk, with the remaining 13 identified as low risk.

The preliminary risk assessment identified the procurement of the following goods with a medium risk to modern slavery:

- steel
- weight gauges and scales
- batteries, generators and kinetic power transmission
- spare parts and consumables
- personal protective equipment and safety gear
- transport and logistics (including road and sea freight)
- facilities maintenance (including cleaning) and security services
- supply of Personal Protective Equipment (PPE) and uniforms
- manufacture and supply of rubber tyres
- manufacture of traction battery chargers

The Company is committed to continuously improving its approach to assessing, identifying, and addressing modern slavery risks within its supply chain and operations, including the completion of the SAQ. Higher-risk suppliers must complete and return their questionnaire on a biannual basis.

Should a higher-risk supplier return a non-conforming response or fail to return the questionnaire without a valid reason, the Company will engage with the supplier in a remediation process.

Continued adherence with the Purchasing Ethics Policy, Modern Slavery Policy, Anti-Slavery Policy, and ultimately the finalisation and implementation of what is currently a draft Modern Slavery Due Diligence process, will provide the framework for the Company's actions and priorities for addressing modern slavery risks within its supply chain during the 2024/2025 Reporting Period.

The Company has implemented and will continue its onboarding process that have continued to be improved upon during the 2023/2024 period, which includes providing suppliers with the Corporation's Code of Conduct and Supplier Code of Conduct. All new suppliers are required to complete the SAQ, allowing the Company to identify potential areas, suppliers, or industries that present risks of modern slavery in its supply chain.

Product and Services Risks

A high-level overview of the Company's supply chain has identified the following products and services which may involve modern slavery risks because of the way they are produced, provided or used. These products and services are: uniforms and clothing; commercial laundering services; offsite storage and archiving; transport services; cleaning services; IT equipment and technical support; labour hire services; products made of plastics and rubber such as seals, wheels and tyres; and, some chemicals products.

Geographic risks

For the 2023/2024 Reporting Period, the Company's suppliers were required to identify specific countries of origin where products were sourced and where potential risks may exist within their supply chain. The following tables identify the countries of origin and associated risks. Sources of

data are the *Walk Free Foundation Global Slavery Index*, *Transparency International* and the *Walk Free Foundation Measurement, Action, Freedom Report*.

Table 1: Prevalence of modern slavery risk

| Country | Potential risk | Type of product sourced | Vulnerability ¹ |
|-------------------|------------------------------------|--|----------------------------|
| Argentina | Forced Labour Forced Marriage | Manufacture of battery cells | 35.5/100 |
| Australia | Forced Labour | Cleaning, transport and hire equipment | 6.8/100 |
| Bangladesh | Child Labour Forced Labour | Manufacture of battery cells and tyres | 58.1/100 |
| Belgium | Human Trafficking | Spare parts | 10.8/100 |
| Brazil | Child Labour Human Trafficking | Batteries, generators and kinetic power transmission | 46.9/100 |
| Bulgaria | Forced Labour Human Trafficking | Manufacture of battery cells | 25.9/100 |
| Canada | Forced Labour | Warehouse Equipment | 10.7/100 |
| China | Child Labour Forced Labour | Manufacture of rubber products, chemicals, textiles and hydraulic fittings | 45.5/100 |
| Fiji | Debt Bondage | Manufacture of textiles for garments and safety clothing | No Rating |
| France | Forced Labour Human Trafficking | Manufacture of electronics Manufacture of hydraulic fittings | 13.3/100 |
| Germany | Forced Labour Human Trafficking | Manufacture of forklift | 10.7/100 |
| India | Forced Labour Debt Bondage | Manufacture of rubber tyres Manufacture of lubricant and oils | 56/100 |
| Indonesia | Child Labour Forced Labour | Manufacture of hydraulic fittings and products | 48.6/100 |
| Italy | Forced Labour Exploitation | Manufactured of Forklift Attachments | 21.7/100 |
| Japan | Human Trafficking Forced Labour | Manufacture of spare parts | 11.4/100 |
| Malaysia | Child Labour Forced Labour | Manufacture of rubber | 37.2/100 |
| Malta | Human Trafficking Forced Labour | Manufacture of lead acid products | No Rating |
| Mexico | Child Labour Forced Labour | Manufacture of forklift | 58.1/100 |
| Philippines | Human Trafficking Forced Labour | Manufacture of electrical components | 66.4/100 |
| Republic of Korea | Forced Labour | Manufacture of forklift | 28.6/100 |
| Sweden | Human Trafficking | Telecommunications | 7.4/100 |
| Taiwan | Forced Labour Child Labour | Supply of PPE Equipment Supply electrical component | 21.3/100 |

¹ Source: *The Walk Free Foundation Global Slavery Index (GSI)*- Calculated using individual and country-level risk factors of modern slavery. Analysis draws on data from surveys implemented through the Gallup World Poll, including a module on modern slavery in 48 countries, and data from the GSI Vulnerability Model.

| | | | |
|----------------|------------------------------------|---|----------|
| Thailand | Forced Labour | Manufacture of rubber products | 46.5/100 |
| United Kingdom | Human Trafficking Forced Labour | Manufacture of electronics Manufacture of lead acid products | 14.3/100 |
| United States | Forced Labour Forced Marriage | Manufacture of forklift | 24.5/100 |
| Vietnam | Human Trafficking Forced Labour | Supply of PPE Equipment Supply electrical components | 43.9/100 |

Table 2: Prevalence of modern slavery

| Country | Prevalence (per 1000) ² | Estimated people living in Modern Slavery | Country | Prevalence (per 1000) | Estimated people living in Modern Slavery |
|------------|------------------------------------|---|-------------------|-----------------------|---|
| Argentina | 4.2 | 189,000 | Italy | 3.3 | 197,000 |
| Australia | 1.6 | 41,000 | Japan | 1.1 | 144,000 |
| Bangladesh | 7.1 | 1,200,000 | Malaysia | 6.3 | 202,000 |
| Belgium | 1 | 11,000 | Malta | Not Listed | Unknown |
| Brazil | 5 | 1,100,000 | Mexico | 6.6 | 850,000 |
| Bulgaria | 8.5 | 59,000 | Philippines | 7.8 | 859,000 |
| Canada | 1.8 | 69,000 | Republic of Korea | 3.5 | 180,000 |
| China | 4 | 5,800,000 | Sweden | 0.6 | 6,000 |
| Fiji | Not Listed | Unknown | Taiwan | 1.7 | 40,000 |
| France | 2.1 | 135,000 | Thailand | 5.7 | 401,000 |
| Germany | 0.6 | 47,000 | United Kingdom | 1.8 | 122,000 |
| India | 8 | 11,000,000 | United States | 3.3 | 1,100,000 |
| Indonesia | 6.7 | 1,800,000 | Vietnam | 4.1 | 396,000 |

Table 3: Government response rating to modern slavery

| Country | Government Response Rating ³ (0 to 100) | Corruption Percentage Index ⁴ (100 to 0) | Country | Government Response Rating (0 to 100) | Corruption Percentage Index (100 to 0) |
|------------|--|---|-------------------|---------------------------------------|--|
| Argentina | 57.7 | 37 | Italy | 59.0 | 56 |
| Australia | 66.7 | 75 | Japan | 43.6 | 73 |
| Bangladesh | 48.7 | 24 | Malaysia | 44.9 | 50 |
| Belgium | 59.0 | 73 | Malta | 48.7 | 51 |
| Brazil | 51.3 | 36 | Mexico | 55.1 | 31 |
| Bulgaria | 55.1 | 45 | Philippines | 59.0 | 34 |
| Canada | 60.3 | 76 | Republic of Korea | 38.5 | 63 |
| China | 39.7 | 42 | Sweden | 62.8 | 82 |
| Fiji | 46.2 | 52 | Taiwan | 47.3 | 67 |
| France | 61.5 | 71 | Thailand | 55.1 | 35 |

² Source: The Walk Free Foundation Global Slavery Index (GSI)

³ Source: The Walk Free Foundation Global Slavery Index - The Government Response Rating measures national efforts to end modern slavery. The government response assessment provides a comparative look at the legal, policy, and programmatic actions that governments are taking to respond to modern slavery. This is based on data collected on 141 indicators that are relevant to understanding how each government is tracking towards achieving 42 activities.

⁴ Source: Transparency International - The Corruption Perceptions Index ranks 180 countries and territories by their perceived levels of public sector corruption, according to experts and businesspeople.

| | | | | | |
|-----------|------|----|----------------|------|----|
| Germany | 61.5 | 78 | United Kingdom | 67.9 | 71 |
| India | 46.2 | 39 | United States | 66.7 | 69 |
| Indonesia | 50.0 | 34 | Vietnam | 47.4 | 41 |

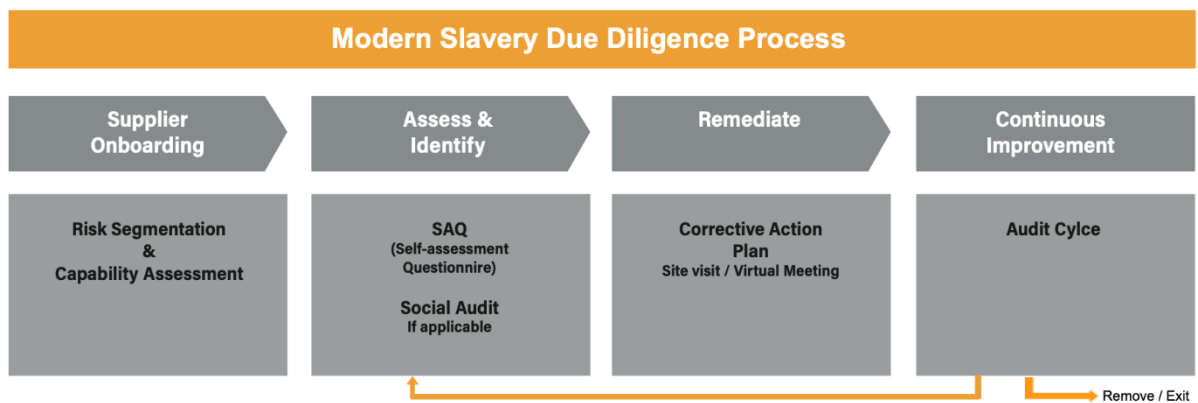
Entity Risks

For the 2023/2024 Reporting Period, the Company has completed an audit of its Tier One, Tier Two, Tier Three, and non-tier local suppliers and found that 22 per cent of suppliers did not meet some or all of the requirements of the SAQ. This is higher than the 2022/2023 Reporting Period due to a greater volume of supplier that were audited. The Company requires all suppliers to complete the SAQ and acknowledges their performance as non-compliant. The Company has been addressing non-compliance concerns during the 2023/2024 Reporting Period. The Company requires corrective measures to be applied and all suppliers will be required to complete the SAQ as part of the 2024/2025 Reporting Period. Suppliers that fail to complete and comply with the Company's requirements, will be deemed non-compliant and may be removed from the Company's supply chain. The Company identified that the remaining 78 percent of suppliers completed the SAQ and their responses complied with the Company's values, standards, policies, and stance on modern slavery.

This assessment focused on the fundamental risks of exploitation involved in producing products and delivering services in and to the Company's operations and supply chain.

The Company is committed to continuously improving its approach to assessing and identifying modern slavery risks in its supply chain and operations via its Modern Slavery Due Diligence Process. Should a supplier either fail to complete the SAQ or their responses do not comply with the Company's stance on modern slavery, the Procurement department will seek to remediate with the supplier, and if corrective measures are not met, may remove the supplier from the Company's supply chain.

Diagram 1: Modern Slavery Due Diligence Process



In the 2024/2025 Reporting Period, the Company is renewing its focus on Tier Two suppliers, and the 22 percent of suppliers that did not meet the submission requirements for their SAQ response in the 2023/2024 reporting period, via conducting phone interviews or site visits.

5. Assessing and Addressing Risks

During the 2023/2024 Reporting Period, the Company completed a high-level audit, taking into consideration its tiered approach noted above, to assist in identifying, preventing, mitigating and accounting for modern slavery risks in its supply chain.

In the 2023/2024 Reporting Period, the Company actively engaged its supply chain and endeavoured to monitor supplier compliance to identify modern slavery risks and practices and opportunities for development. This was undertaken via the annual SAQ. A third-party social audit program has aided the Company in developing this survey. The Company's approach is to empower its operational and procurement team with the proper training and processes to identify and act on modern slavery risks, including maintaining awareness of the modern slavery framework.

Additionally, suppliers and vendors have been receiving revised supply conditions that detail the Company's desire to only conduct business with companies that comply with its opposition to modern slavery. The Company understands that supply chain audits are not the sole action that would eliminate modern slavery practices; however, they are one of the tools that will help to identify and indicate practices of modern slavery. Procurement reviews each audit report and identifies any non-compliances or non-returns. These critical or zero tolerance findings are being escalated for additional supplier engagement and investigation. The Company will continue to report and submit its annual Modern Slavery Statement.

The most significant contributor to the Company's supply chain and operations, the Corporation, continues to seek improvements globally. This has included seeking commitments from its suppliers on preventing child labour and confirming that they do not partake in, accept, or use child labour. As part of this process, the Corporation communicates with each active supplier, including the provision of a copy of the Corporation's Child Labour Prevention and Response Policy. It seeks acknowledgement, receipt and compliance with the Corporation's policy. Two of the largest suppliers to the Company promote their own policies and standards in this regard, noting their zero-tolerance approach to modern slavery in their organisations and supply chains and the requirement to adopt and comply with their business ethics and fair-trade commitments.

Sustained and related efforts during the 2023/2024 Reporting Period that may have served to mitigate the risk of modern slavery as well as increase the opportunity for the reporting of modern slavery concerns are:

Corporate Hotline

Since 2012, in coordination with the Corporation, the Company has maintained a 24-7-365 Whistleblower hotline. This program is administered by an independent third-party and is designed to allow employees and people connected to the Company, to anonymously report their concern in the language of their choosing. Training on the program is provided to all employees on their commencement, and the program is also promoted on signage at all Company locations and on the Company's intranet. In 2019, the Corporation expanded this offering by providing an online platform in addition to the hotline phone line and continues to explore improvements that will make the program more accessible for users.

Whistleblower Policy

The Company maintains a formal Whistleblower Policy consistent with the Company's obligations following amendments to the *Corporations Act 2001*. A Global Whistleblower Policy is also being developed and will be introduced during the 2024/2025 Reporting Period.

Global Code of Conduct

In 2018, the Corporation introduced a Global Code of Conduct which was adopted and implemented by the Company. The Global Code of Conduct confirms, among other commitments, the commitment of the Company to comply with laws, rules and regulations; respect for the individual; integrity and anti-corruption; fair dealing; and supply chain governance. Critically, the Global Code of Conduct reiterates the commitment of the Company to encourage employees and individuals to report suspected violations and concerns and reaffirms the Company's commitment to non-retaliation. The Global Code of Conduct is reviewed and rolled out annually.

Global Compliance Program

In 2018, the Corporation appointed a Chief Compliance Officer and in 2019, Regional Compliance Officers were appointed in the Europe, Middle East & Africa (EMEA) Region and the Asia Pacific Region. The Corporation's Compliance Committees, oversee the activities and efforts of several subcommittees, focused on: Employment and Labour Compliance, Environment, Health & Safety Compliance, Privacy Compliance and Trade Compliance. The Company is represented in each subcommittee and is required to apply and comply with the Corporation's broad and specific compliance initiatives.

Anti-Bribery and Corruption Training

During the 2022/2023 Reporting Period, the Corporation continued rolling out online training modules to complement and confirm acknowledgement and understanding of its Anti-Bribery and Corruption Policy and other related policies. Training was refreshed and undertaken again in the 2023/2024 Reporting Period.

Remediation

The Company is not currently aware of any modern slavery practices that it may have caused, contributed to, or be directly linked to, and did not become aware of any during the 2023/2024 Reporting Period. Resultingly, there is no remediation to report. The Company has created a structured process within its supply chain to reduce any exposure to modern slavery risks by implementing the SAQ, due diligence processes, and introducing a remediation process with its suppliers that may be engaging in modern slavery practices.

The Company is committed to reducing modern slavery risks within its supply chain.

In the 2023/2024 Reporting Period, the Company has continued improving its Supplier Code of Conduct which sets the Company's expectations for suppliers, including the ethical sourcing of products and treatment of its supply chain workers. The Company is committed to an ongoing journey of reducing and eradicating the risk of modern slavery practices in its supply chains and throughout its business operations, domestically and abroad.

6. Assessing Effectiveness

To ascertain or discover the risks of modern slavery practices within its supply chain, the Company has introduced and continues to develop its controls such as the SAQ and Modern Slavery Due Diligence Process. Each year that the program is in place, the Company is in a better position to assess and report on the effectiveness of these measures.

Where there is any suspected or alleged breach of the Company's policies by an employee or supplier, the breach will be reported to the senior executive. The Company's Procurement, Compliance, Human Resources, and Legal departments will conduct a review or investigation.

If the breach has been substantiated, it will be reported to the Corporation via its Compliance, Internal Audit, and Legal departments. Where required, third-party support will be sought. Should the supplier be found non-compliant with the Company's policies, it may remove the supplier from its supply chain.

During the 2023/2024 Reporting Period, there were no reports of suspected or alleged breaches of the Company's Ethical Sourcing and Modern Slavery Policies.

Assessing the effectiveness of the existing policies, practices, and programs, and the compilation of the Company's Annual Modern Slavery Statement, includes collaboration between various functions and departments within the Company and also provides ongoing opportunities to review the following:

- Performance against existing key performance indicators within the Company's contractual agreements and ensure suppliers manage modern slavery within the supply chain;
- The review by Procurement of supplier's SAQ responses;
- Modern Slavery Due Diligence processes to address any gaps or breaches; and
- Feedback from internal and external contributors and stakeholders.

7. Consultation Processes

The Company does not need to respond to this criterion as it does not own or control any other entities with employees or independent supply chains.

8. Other Information

The Company maintains its commitment to its Anti-Modern Slavery undertakings and initiatives, which will continue to be reflected in its ongoing statement submissions.

During the 2023/2024 Reporting Period the Company has continued to develop and review its policies and processes with relevance to Modern Slavery and Anti-Slavery highlighting its commitments and expectations to its employees and supply chain.

9. Approval of Modern Slavery Statement

This statement was approved by the Board of Crown Equipment Pty Ltd on 30 September 2024.



Kieran White
Executive Managing Director Asia Pacific