

MODERN SLAVERY STATEMENT

UNITED
Forklift and
Access Solutions

1. Introduction

United Equipment Pty Ltd (United Equipment) recognises that modern slavery is a complex issue that affects workers, individuals and communities globally on an enormous scale. We are determined to work collaboratively with our suppliers and other stakeholders to play our part in ending modern slavery.

Modern slavery occurs when a person is forced into exploitative situations where they cannot refuse or leave work due to threats, violence, coercion, abuse of power or deception. The definition of modern slavery in the Modern Slavery Act 2018 (Cth) (the Act) encompasses slavery, servitude, the worst forms of child labour, forced labour, human trafficking, debt bondage, slavery like practices, forced marriage and deceptive recruiting for labour or services.

United Equipment is committed to acting responsibly and with high ethical standards. We are guided by our core values set out below.

Core Values



We have and continue to develop processes and procedures to identify and remedy instances of modern slavery and recognise that enormous work is needed, globally, to address these issues.

This Modern Slavery Statement describes the structure, operations and supply chains of United Equipment, and the risks of modern slavery in those operations and supply chains during the period 1 July 2019 to 30 June 2020 (Reporting Period). It also details the actions taken by United Equipment to minimise the identified risks and the effectiveness of those actions.

2. Reporting Entity

This Modern Slavery Statement has been prepared in accordance with the Act.

The reporting entity covered by this modern slavery statement is:

United Equipment Pty Ltd ABN 48 115 672 841.

United Equipment is an Australian proprietary company with its registered office in Welshpool, Western Australia.

3. Structure, operations and supply chain of United Equipment

Structure:

United Equipment Pty Ltd (ACN 115 672 841), trading as United Forklift and Access Solutions, is a privately owned Forklift and Access equipment company, servicing customers only in Australia. We are a member of the Elphinstone Group of companies.

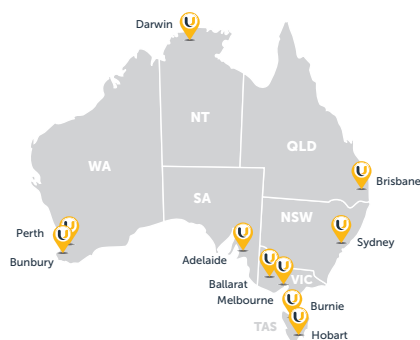
Headquartered in Perth, WA, we have branches in all states of Australia. We have 315 full time employees. Employees are engaged in a range of roles including management, sales, administration and equipment servicing. Branch managers are responsible for operations in each location and report directly to head office.

Operations:

Our core operations are Sales, Service & Rental of forklifts and access equipment. Our primary brands include: Caterpillar Forklifts, Haulotte and Almac Access Equipment and Konecranes container handler forklifts, all of which are manufactured overseas.

Our operations are supported by the following functions:

- › finance and credit;
- › legal and risk management;
- › human resources;
- › information services; and
- › marketing.



Supply Chain:

We have approximately 400 active vendors, with our top 20 vendors accounting for almost 80% of total spend. These suppliers provide a wide variety of products and services, ranging from imported equipment and parts to locally acquired products, services, utilities and cleaning. These vendors are each individually assessed prior to obtaining approved supplier status.

4. Modern slavery risks

At a high level, United Equipment acknowledges that there are risks that modern slavery practices may occur within its supply chains and operations that may lead to United Equipment causing, contributing to, or being directly linked to modern slavery. We discuss each of these elements below.

United Equipment considers the risk that it is responsible for directly causing modern slavery is very low. We have a range of internal control and governance measures designed to foster (and monitor) ethical business conduct in everything we do.

Internal personnel risk is largely managed by our professional and thorough recruitment practices. United Equipment predominantly engages its employees on permanent employment contracts and has policies, procedures and resources to ensure compliance with relevant laws, including with respect to employee pay and entitlements. Other policies contributing to the ethical treatment of our personnel and other people in our operations include our:

- › Code of Conduct;
- › Equal Opportunity, Anti-Discrimination, Harassment & Bullying Policies; and
- › Anti-bribery and Corruption Policy.

United Equipment also has a Whistleblower Policy with anonymous reporting available to employees to raise any concerns regarding modern slavery (as well as other illegal, unethical, fraudulent or undesirable conduct).

In addition, all employees have access to an independent employee assistance program.

There is some risk within United Equipment's supply chain that it may contribute to modern slavery, however United Equipment considers that the risk is very low. United Equipment always aims to treat its suppliers ethically and would never knowingly act in a way (such as through the exertion of commercial pressure or the imposition of contractual terms and conditions) that directly or indirectly incentivises a supplier to engage in modern slavery practices.

United Equipment recognises that there is also a risk that it may be directly linked to modern slavery practices as a consequence of its suppliers, or suppliers to its suppliers, engaging in modern slavery activities without United Equipment's knowledge. To better understand its supply chain risks, United Equipment has undertaken an initial risk assessment of its most significant suppliers.

United Equipment will build on this process in the future to engage with suppliers identified as high or medium risk to investigate areas of improvement or potential alternatives.

5. Actions to assess and address modern slavery risks

During the Reporting Period, United Equipment took numerous actions to assess and address the risks of modern slavery within its operations and supply chains. As part of this process, United Equipment engaged its senior management team to ensure appropriate oversight and awareness was received by all parts of the business.

Some of the actions and outcomes that United Equipment has undertaken during the Reporting Period are outlined below:

Assessment of risks:

- ▶ Engaging with senior management to ensure appropriate oversight for compliance with the Act and in assessing modern slavery risks more generally.
- ▶ Performing an audit and review of United Equipment's major suppliers to identify risks of modern slavery within the supply chain and following identification, to address areas and methods where such risks can be prevented or mitigated, with the aim of minimising and ultimately eliminating modern slavery.

Addressing and mitigating the risks of modern slavery:

- ▶ Implementation of a Modern Slavery Policy and Supplier Code of Conduct, adherence to which by United Equipment and its supplier will mitigate risks of modern slavery being present in our operations and supply chain.
- ▶ Updating our standard procurement contract to include modern slavery clauses that (among other things) require suppliers to assess and address modern slavery risks in their supply chains, and will allow United Equipment to audit suppliers and to terminate agreements for non-compliance with modern slavery obligations.
- ▶ Consolidation of supplier information and procurement processes, including developing a procurement policy.
- ▶ Training our senior managers and procurement team in respect of modern slavery.

6. Assessing the effectiveness of actions

In assessing the effectiveness of the actions we have taken in this first Reporting Period to assess and address modern slavery risks, we report the following outcomes:

- ▶ our supplier audit and risk assessment has given us a greater understanding of the participants in our supply chain;
- ▶ our employees, particularly our senior leaders and procurement team, have a greater understanding of the prevalence of modern slavery and the actions we can take to minimise the risks;
- ▶ our suppliers are contractually obliged to investigate, assess and address modern slavery risks within their operations and supply chains; and

- ▶ in our capacity as a supplier, we actively participate with our customers to ensure our own compliance with modern slavery laws, including that United Equipment does not cause modern slavery and limits its direct or indirect involvement to the extent reasonably possible.

7. Process of consultation

United Equipment does not own or control any operating entities that require consultation in relation to modern slavery risks under the Act. United Equipment has engaged in discussions with other businesses to understand and share experiences in assessing and addressing modern slavery within the respective organisations.

During the preparation of this statement and the work undertaken in addressing modern slavery risks there has been input from many areas of the United Equipment organisation, including procurement, finance, legal and senior management.

8. Looking forward

United Equipment is committed to continuous improvement of its procurement processes and to strive towards identifying and minimising modern slavery within its operations and supply chain.

We will continue to engage with our suppliers to understand the risk profile in relation to modern slavery and seek to mitigate those risks where possible.

United Equipment will build on the supplier risk analysis process in the future to engage with suppliers identified as high or medium risk to investigate areas of improvement or potential alternatives.

Our employees, in particular our procurement team, will undertake further training in relation to modern slavery and its impacts across our business and more widely.

9. Approval of Modern Slavery Statement

This statement was approved by the board of directors United Equipment Pty Ltd on 30th March 2021.



David Maxwell
Managing Director

Appendix

This Modern Slavery Statement was prepared to address the mandatory criteria and to ensure compliance with the Modern Slavery Act 2018.

The table below sets out where each mandatory criterion is addressed within the statement.

Mandatory Criteria		Page Number:
1.	Identify reporting entity.	2
2.	The structure, operations and supply chains of the reporting entity.	3
3.	The risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	3-4
4.	The actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks.	4
5.	How the reporting entity assesses the effectiveness of such actions.	4-5
6.	The process of consultation with any entities the reporting entity owns or controls or is issuing a joint modern slavery statement with.	5
7.	Any other information that the reporting entity, or the entity giving the statement, considers relevant.	5