

# Modern Slavery Statement 2021

## 1. INTRODUCTION

This statement, made according to the Modern Slavery Act 2018 (Cth) (the Act), is published on behalf of Ausco Holdings Pty Ltd and its wholly owned Australian subsidiaries, Ausco Acquisitions Pty Ltd, Ausco Asia Pty Ltd, Ausco Finance Limited, Ausco Modular Pty Limited, Ausco Modular Construction Pty Ltd and New England Trading Pty Ltd (together referred to as Ausco, we, us or our).

The purpose of this statement is to outline our approach to ensuring that Ausco has comprehensive frameworks and processes in place to minimise the risks of modern slavery in our business operations and supply chain. Ausco acknowledges that slavery can occur in many forms as detailed in the Act including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting. Ausco is committed to operating responsibly and establishing and adhering to the highest ethical standards with a goal of identifying and working with its supply chain to eradicate the various forms of slavery.

## 2. OUR STRUCTURE, OPERATIONS & BUSINESS

In Australia, Ausco is a modular building company with over 400 employees having a combined turnover of over \$390 million. Ausco Holdings Pty Ltd is a wholly owned subsidiary of Modulaire Investments B.V., incorporated in Australia and has its headquarters in Brisbane. Ausco Holdings Pty Ltd owns seven subsidiaries, Ausco Acquisitions Pty Ltd, Ausco Asia Pty Ltd, Ausco Finance Limited, Ausco Modular Pty Limited, Ausco Modular Construction Pty Ltd, New England Trading Pty Ltd and New Zealand entity, Portacom New Zealand Limited. From a practical perspective, the six Australian entities operate as one entity and share board members, corporate functions, policies, and procedures.

Ausco's main operations consist of the hire, manufacture, sale, installation and repair of transportable buildings and the provision of accommodation via "Stayover" to our customers, both government and enterprise in Australia and New Zealand, as well as corporate functions including sales, marketing, finance, design, procurement, human resources, legal risk, and compliance.

Our supply chain is comprised mostly of the procurement of building-related materials and services incorporated into our transportable buildings and on-sold or hired to customers, ancillary goods and services related to our transportable buildings that are supplied or hired to customers, accommodation and food service providers, professional services consultants, and office consumables.

## 3. RISK IDENTIFICATION

In FY2020, Ausco commenced a review of the potential risk of modern slavery practices across our operations and supply chain taking into consideration factors such as sector, industry, product and service type and geographic location. Ausco are identifying some high-risk areas which will form part of future assessments as well as areas on which it should focus its immediate efforts including major suppliers in each category, its field services suppliers, services currently delivered from overseas and its cleaning services. Our review will also reveal limitations in the data captured and recorded on some of our suppliers. We will use these review results to prioritise our supplier engagement activities next financial year.

## 4. RISK MANAGEMENT AND DUE DILIGENCE

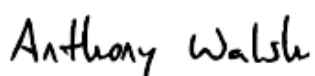
To manage the risks of modern slavery in our business, Ausco has undertaken the following measures:

- Engaged a leading specialist procurement consulting organisation to review our current procurement practices, provide a status report on our compliance to the Modern Slavery Act and provide recommendations of any potential areas of improvement.
- Implemented online learning modules to provide employees and managers an improved understanding on the impacts and risks of Modern Slavery in operations as well as through the supply chain.
- Reviewed all internal operations processes to evaluate and ensure Modern Slavery compliance.
- Reviewed and updated the Recruitment Policy to increase the visibility of how we protect workers from Modern Slavery through our recruitment and selection processes.
- Reviewed and updated the Employee Onboarding Guide to ensure that new starters are provided with relevant information about their employment and remuneration in a way that is clear, easily understood and readily available to them.
- Reviewed and updated the Termination Policy to ensure that employees and managers are aware of an employee's ability to terminate their employment of their own free will.

## 5. ONGOING ASSESSMENT OF RISK

In 2021, and the years to come, Ausco will work to increase collaboration with internal and external stakeholders to prevent and address any contribution that Ausco may have to the global issue of modern slavery. Ausco will achieve this by focusing on raising awareness of the forms of modern slavery among our employees and suppliers, continuing to evolve our due diligence processes to aid in the identification of risks, expanding the scope of our supply chain risk assessment, reviewing existing processes and exploring ways to improve identification and action on risks throughout our supply chain. Modern slavery supply chain risks and actions are also being considered as part of the development and implementation of a social procurement strategy which is expected to commence in the next reporting period.

This statement was approved by the boards of Ausco Holdings Pty Limited and its subsidiaries.



Anthony Walsh  
Managing Director