



## CLARK EQUIPMENT WHS MANAGEMENT SYSTEM

Modern Slavery Act Policy (Statement)

WHS-POL-013

### POLICY TITLE PAGE

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## 1 INTENT

In 2018, the Australian Government legislated the Modern Slavery Act for corporations in Australia with a turnover of over one hundred million dollars to annually report the risks of modern slavery in their operations and supply chains.

Clark Equipment is committed to taking reasonable steps to ensure it in no way supports modern slavery in any of our business or supply chains. Clark Equipment has a zero-tolerance approach to modern slavery and is committed to acting ethically in all our business dealings.

We expect our suppliers to also comply with modern slavery laws including prohibiting human slavery and slavery like practice, human trafficking and child labour.

## 2 SCOPE

This statement is issued in accordance with the Modern Slavery Act 2018, in effect in Australia. This applies to all directors, officers, employees and suppliers.

Clark Equipment is subject to the requirements of the Modern Slavery Act 2018 as a reporting entity. Under section 16 of this Act, Clark Equipment must submit Modern Slavery Statements to identify and address mandatory criteria.

## 3 REFERENCES

- *Modern Slavery Act 2018*
- *WHS-POL-012 Equity and Diversity Policy*
- Various Clark Equipment Group WHS policies and procedures

## 4 REPORTING ENTITY

For the purpose of this statement, 'Clark Equipment' will encompass Clark Equipment Sales, Clark Equipment Rentals and Daken.

Head office is located in Hornsby, Sydney, NSW, AUSTRALIA.



## 5 STRUCTURE AND OPERATION

Clark Equipment is a BRW Top 500 Australian Private Company, with over 450 employees and operating from 17 locations around Australia and New Zealand.

Clark Equipment, across our entities is a:

designer of industrial equipment,  
designer, retailer and wholesaler of mobile & stationary plant,  
distributor, retailer and wholesaler of commercial equipment.

## 6 RISKS IN OPERATION AND SUPPLY CHAIN

As a manufacturer and distributor of plant and equipment, our operations inherently involve complex supply chains that span multiple tiers and geographies. This complexity increases the risk of modern slavery, particularly in the sourcing of raw materials and components from regions with weak labour protections or limited regulatory oversight. Risks may arise in industries such as electronics and metal fabrication, where forced labour and exploitative practices are more prevalent.

We recognise that modern slavery can occur at any stage of the supply chain, including subcontracted labour, logistics, and packaging, and we are committed to identifying and mitigating these risks through robust due diligence and supplier engagement.

Within our direct operations, while the risk of modern slavery is comparatively lower due to our compliance with Australian labour laws, we remain vigilant. Risks may still exist through outsourced services such as cleaning or security, where vulnerable workers may be exposed to coercion or deceptive recruitment practices.

We ensure that our contractors and service providers adhere to ethical labour standards and are subject to regular review. Our internal policies promote transparency, fair treatment, and grievance mechanisms to safeguard against exploitation.

In our global supply chain, visibility beyond Tier 1 suppliers remains a significant challenge. Many components used in our equipment may originate from countries with moderate modern slavery risk profiles, particularly in the metals sectors. To address this, we are implementing supplier mapping and risk assessments, prioritising high-risk regions and industries.

We require suppliers to complete modern slavery questionnaires and agree to contractual clauses that prohibit modern slavery. These measures support our commitment to responsible sourcing and compliance with the Modern Slavery Act 2018, while also protecting our reputation and stakeholder trust.



## 7 ACTIONS TO ADDRESS MODERN SLAVERY RISKS

We work directly with our suppliers and as long distance relationships are challenging, we endeavour to periodically visit each supplier. It is not possible to attend and review all current suppliers, so currently we are focussed on our tier one suppliers.

We have approved suppliers with which we continually update and monitor. If an issue is identified with a supplier, a corrective action plan will be developed with them to resolve all contraventions. If this is not adequate, is not followed, or is not possible, Clark Equipment will terminate the relationship with that company.

For new suppliers we undertake a supply chain risk assessment with them to identify any high-risk behaviours or activities. Typically, we would endeavour to be visiting the new supplier as part of our supplier validation process.

We have a range of WHS policies and procedures with which to assist the management and Human Resources Division of Clark Equipment, monitor and mitigate risks associated with modern slavery. These policies and procedures will be updated to better incorporate the outcomes of modern slavery risks.

Our new-employee validation process ensures no improperly aged people are employed within our company and that each employee is established under the appropriate industrial award or system.

## 8 VERIFICATION OF THE EFFECTIVENESS OF THE ACTIONS

We review any reports received from employees, the public, customers and law enforcement agencies which indicate modern slavery practices.

We manage the results of breaches identified by internal audits and other means.

We annually review our risk assessment process and audit programs to ensure they are correct and current. In this period, we will be further improving and formalising the audit process.

## 9 CONSULTATION PROCESS

Clark Equipment engages with its key internal stakeholders and external bodies in the preparation and review of this document.

Clark Equipment maintains a proactive dialogue on the performance of this process.



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### 10 DIRECTORS APPROVAL

This statement was approved by the board of directors with the signature of the CEO, Robert Hammond, shown, covering the reporting period 01 July 2024 to 30 June 2025

END