

MODERN SLAVERY STATEMENT 2024

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Onsite is dedicated to fostering a diverse and inclusive workforce that is deeply connected to the communities within close proximity to its branches.



MODERN SLAVERY STATEMENT 2024

EXECUTIVE SUMMARY

Onsite Rental Group and its related entities (Onsite) are committed to respecting the fundamental human rights of every individual to live free from all forms of slavery. We strongly oppose the exploitation of individuals for personal or commercial gain and expect the same standards from our business partners.

With a national presence and significant operations in regional and remote areas across Australia. This commitment extends to our choice of business partners, and suppliers which include smaller local organisations where possible.

Onsite acknowledges the global prevalence of exploitive practices and the complexities involved in identifying and addressing modern slavery risks within supply chains. We understand that the path to eliminating these practices requires education, collaboration, and the active promotion of ethical standards throughout our operations and supply chain.

This Modern Slavery statement outlines the actions Onsite has taken to strengthen ethical practices across its business, contributing to the global effort to eradicate slavery and exploitation.



Sime Darby Allied
Operations Pty Ltd

100%

Onsite Rental
Group Limited

100%

Onsite Rental Group
Operations Pty Ltd

STRUCTURE & OPERATIONS

Our statement is written on behalf of Onsite Rental Group Limited as a single reporting entity incorporating the operations of its wholly owned subsidiary Onsite Rental Group Operations Pty Ltd (ACN 126 102 485) (ORGO) which is the primary trading entity.

For the purposes of this Statement, references to “Onsite” are to Onsite Rental Group Limited and to its wholly owned subsidiary.

On 3 April 2023, Sime Darby Allied Operations Pty Ltd (SDAO) acquired Onsite Rental Group Pty Ltd and its subsidiaries. SDAO is wholly owned by Sime Darby Industrial Australia Pty Ltd (SDIA). SDIA is a wholly owned subsidiary of Sime Darby Industrial Holdings Sdn Bhd (Sime Darby Industrial), the industrial division of Malaysian investment holding company, Sime Darby Berhad. The principal activities of companies within the industrial division are the sale, rental and servicing of Caterpillar products and also delivering industrial solutions and services for

customers in the mining, construction, transport, power generation, forestry, marine, and oil and gas sectors. The management of ORGO hold key positions in the Board of Directors of the parent company, ensuring the parent company is closely linked to and apprised of the business being conducted by ORGO. In preparing this Modern Slavery Statement, ORGO, as the primary trading entity of the Onsite group was made aware of Onsite’s obligations under the Modern Slavery Act 2018 (Cth), including but not limited to the obligation to carry out and implement due diligence throughout its operations, identify risk and provide meaningful feedback to the actions undertaken and anticipated such that the information could be incorporated into the Statement. In carrying out these steps, ORGO has treated the business and operations of each of its subsidiaries (if any) as forming part of its own business, thereby ensuring that each of the reporting entities have been included in and covered by this Statement prepared for and on behalf of the entire Onsite group of companies.



Onsite is dedicated to actively mitigating the risk of modern slavery in our supply chain through rigorous supplier assessments, ongoing training, and transparent reporting practices.

SUPPLY CHAIN & RISKS

Onsite is a business-to-business specialist in equipment rental with over 30 years of industry experience. We employ approximately 500 staff across more than 35 branches and satellite offices managing a fleet of over 70,000 pieces of equipment available for hire. Our branches are located in Western Australia, South Australia, Queensland, Northern Territory, New South Wales and Victoria. Onsite's corporate offices are based in North Sydney, NSW.

Onsite is committed to identifying and addressing any actual or potential adverse impacts arising from its activities, whether directly or through its business relationships.

We recognise that modern slavery risks vary based on several factors, including the nature of the industry, the type of workforce involved, and the level of human rights protection and enforcement in the countries where product or services are sourced or delivered.

Onsite's position continues from our previously lodged Statement such that our policies and procedures enhance our capacity to ensure we minimise any risks of directly causing or contributing to modern slavery. We recognise that the risks of modern slavery may vary and increase throughout our supply chain, depending on the sector, business location, operations and external workforce of those suppliers.

MACHINERY & EQUIPMENT

In 2024, Onsite has focused on identifying its key machinery and equipment suppliers across all five of its product groups. While most of our equipment is sourced from Australian suppliers, the original manufacturing countries include USA, UK, Canada, China, Italy, Belgium, Spain, France, Indonesia, Japan and Vietnam.

Once the equipment reaches the end of its useful life, Onsite sells it through auction houses or directly to business in Australia and overseas. Although Onsite does not knowingly engage in or support modern slavery practices, we acknowledge that certain aspects of purchasing or sales in higher risk countries may introduce potential vulnerabilities within our supply chain.

WORKFORCE

Onsite's workforce includes employees on work visas from various countries including United Kingdom, Ireland, Pakistan, France, Iran, India, Philippines, and South Africa. Onsite recognises the risks associated with sourcing labour from countries that have a proportionately greater risk of modern slavery or exploitative practices.

We have reviewed our contracts with workforce agencies to ensure compliance with modern slavery legislation and have identified higher-risk activities that require further investigation and due diligence. Additionally, Onsite outsources certain information technology projects and sources uniforms from countries in Asia. These areas have also been identified as requiring further investigation and due diligence in our operations.



SUPPLY CHAIN & RISKS

TRADES & SUBCONTRACTING

Onsite also procures services from third party providers including:

- equipment transport services based locally near the customers' sites.
- equipment installation and dismantling services based locally near the customers' sites.
- general services providers (e.g., electricians) based locally near the customers' sites.
- consultancy, recruitment, legal, accounting and tax services.

All of these subcontractors and service providers are domiciled in Australia and are required to agree to a series of prescribed terms. These terms including various warranties and obligations requiring compliance with Modern Slavery legislation and prohibitions against conduct which may contribute towards modern slavery risks or exploitative practices. This is discussed on the following page.



The Charter encourages an inclusive, diverse and respectful work environment which embraces human rights and reinforces Onsite's commitment to addressing the impact of modern slavery risks to our operations and supply chain.

DEVELOPMENT OF POLICIES & PROCEDURES

POLICIES - CODE OF CONDUCT

Onsite has recently consolidated multiple policies into a revised version of its Code of Conduct which represents a significant step forward in Onsite's commitment to combating Modern Slavery. This integrated approach simplifies what was formerly a series of complex documents, facilitating greater acceptance and understanding by the business and its internal / external stakeholders. It also ensures the business, and its stakeholders are aligned with our core values and legal obligations.

Having now absorbed the provisions relating to Ethical Business, and Anti-bribery/Anti-corruption, the Code of Conduct is a cohesive library outlining a framework and central reference point for all ethical guidelines within the business. It has also enabled us to strengthen our reporting practices by encouraging whistleblowing across the board (also in the context of corruption/bribery in addition to Modern Slavery).

Directly associated with this Code of Conduct is Onsite's grievance mechanism with dedicated hotlines for anonymous reporting and whistleblowing of actual or suspected unethical conduct. Onsite also utilises an external specialist service provider (STOPline) as a whistleblowing channel that allows stakeholders to report their concerns anonymously.

POLICIES - HUMAN RIGHTS CHARTER

As a member of the Sime Darby Group, Onsite continues to conduct itself pursuant to Sime Darby's Human Rights Charter which was first rolled out in 2023. This Charter forms part of all onboarding processes for employees of Onsite to enable learning and transparency and setting expectations early on in any engagements.

The Charter encourages an inclusive, diverse and respectful work environment which embraces human rights and reinforces Onsite's commitment to addressing the impact of modern slavery risks to our operations and supply chain. The Charter outlines a spectrum that ranges from decent work to serious criminal exploitation and a comprehensive outline of the various measures in place which encourage greater transparency, due diligence and risk mitigation in the context of human rights and modern slavery compliance.

PROCESSES - SUPPLIER ENGAGEMENT

Our learnings and actions over the past twelve months have allowed us to successfully implement our onboarding and procurement processes. This involves a reformed documented registration process and pre-qualification exercise by all suppliers which assesses their background, technical expertise and financial capability. The process also requires Suppliers to submit copies of policies and quality standards for review by Onsite. Suppliers are also required to make a representation that they comply with all laws related to anti-slavery and prohibited business practices.

To ensure we are maximising our reach efficiently and effectively, we have categorised our suppliers based on various parameters corresponding to a risk matrix; enabling the business to identify those suppliers which are 'high risk' versus 'low risk'. The 'high risk' suppliers are required to refresh their standing on various modern slavery practices through annual questionnaires.



DEVELOPMENT OF POLICIES AND PROCEDURES

PROCESSES - CONTRACTS & THIRD PARTIES

Over the past 12 months, Onsite has identified key stakeholder contracts and recommended and agreed retrospective variations to those contracts. The variations enable Onsite and its external stakeholders to refresh their contractual relationships stipulating clear and concise provisions around modern slavery compliance and mandates around ethical conduct.

Onsite also intends to issue a series of updates to its standard terms and conditions with its customers with enhanced guidelines around modern slavery compliance. These include a series of warranties from our customers of their knowledge and capacity to comply with Modern Slavery laws as well as a requirement to demonstrate compliance with documented evidence.

Off the back of these updates, we have also expanded our suite of standard form agreements with service providers, suppliers, transport services providers and other third-party consultants each of which include extensive modern slavery provisions, establishing a recurring theme in the manner by which we conduct business with external stakeholders.

From a business perspective, developing Key Performance Indicators that are specific and measurable by which the effectiveness of the steps taken by Onsite can be assessed. These performance indicators are used to identify the progress made in areas such as human resource practices – particularly with regard to overseas recruitment, onboarding, training and education, procurement and vendor selection through the supply chain, due diligence and focus areas, reporting of concerns and grievances and effectiveness of remediation notices.

PROCESSES - RECRUITMENT & OUR WORKFORCE

As part of Onsite's recruitment procedures, Onsite only uses reputable recruitment firms. Employees or potential employees do not pay the recruitment firms. Onsite carefully assesses the terms of engagement with any recruitment firms to ensure there are mechanisms and guidelines in place to minimise risks of modern slavery in the supply chain during the recruitment process.

Mandatory training is offered to all of our work force, with specific training focussing on the additional human resource risks and training for our staff employed on working visas. The general training modules are conducted on the employee portal SharePoint and on site and are reviewed annually to ensure the training material is current and aligned with statutory changes.

It is expected that training will continue to be refreshed annually to ensure the content is current and consistent with statutory updates. The workforce training will consist of various learning modules that reflects the varied environments in which Onsite conducts its business. This includes our corporate offices through to remote branches, or satellite branches on customer premises. The training will target all of the diverse roles in the business and will present information to better familiarise the workforce with modern slavery risks and mitigation strategies, increasing the chances of effective risk identification and reporting by the workforce.



OUR VISION FOR THE FUTURE

Our vision for the next 12 months is to explore external resources including dedicated platforms which may assist to automate our modern slavery processes driving efficiency and improved collation of data obtained from our assessments. We also intend to identify and engage with external specialists to review our current processes and advise as to the extent of our compliance including to recommend areas for improvement in our processes as well as our policies which are referred to above.

This statement is made pursuant to section 13 of the Modern Slavery Act 2018 (Cth) and constitutes the Modern Slavery Statement of Onsite Rental Group Limited for the year ending 30 June 2024. This statement has been approved by the Board of Onsite Rental Group Ltd and I, Scott Nicholls, have been authorised to sign this statement on their behalf.

Scott Nicholls
 Director

Dated: 15/11/24



