



MODERN SLAVERY STATEMENT

Titan Group of Companies

Last reviewed and updated 21st November 2023.

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Scope

The following statement covers the activities of Titan Group of Companies including its entities Titan Cranes and Rigging Pty Ltd (ABN 68 109 564 721) and Titan Hoists and Rigging Pty Ltd (ABN 60 161 009 383) (Titan Group) during the financial year ending 30th June 2024.

The Titan Group is committed in reducing the risks of modern slavery within its supply chains and to continuously identify improvement opportunities to mitigate modern slavery and ethical sourcing risks.

This statement is made in accordance with the Modern Slavery Act 2018.

Our Structure and Operations

Titan Group is a privately owned and operated organisation which operates within Australia and New Zealand. Titan Group provides bespoke high-risk goods and services to the construction industry which includes but is not limited to:

- Supply of Tower Cranes
- Supply of Man and Material Hoists
- Mobile Crane supply
- Labour Hire
- Servicing and Maintenance of Tower Cranes and Hoists
- Critical works to cranes and hoists
- Manufacture and supply of specialised componentry to support the critical works
- Associated transport.

Titan Group has offices in Sydney, Brisbane, Queanbeyan, Adelaide, and Auckland (NZ) in addition to network of experts around Australia. The head office is located at 7 Curtis Road, Mulgrave, NSW 2756.

Titan Group is an industry leader in the construction sector across its core business as well as being the leading supplier of tower cranes and hoists to the construction industry and the exclusive dealer and licensee of JASO Cranes and Stros Hoists in Australia and New Zealand.

Titan Group on average engage around 350 workers, the majority of which are operational based to ensure the continuous running of the plant and equipment on client's sites.

All employees are subjected to Australian and New Zealand pre-employment and subject to Australian employment conditions. A significant number of workers are employed pursuant to Enterprise Bargaining Agreements (EBA) ensuring the risk of employment encouraging modern slavery practices is eliminated.

Our Supply Chain

Titan Group operates with a high degree of due diligence within the supply chain processes. Where possible, Titan engages with internal suppliers to cover critical spares and servicing of the plant and equipment. Due to our implemented internal processes, the net result is the minimisation of inherent modern slavery risks.

An example includes, use of the internal fabrication department, implemented and engaged to fabricate and construct bespoke structures and supporting equipment used across critical works for the erection of tower cranes and hoists as well as supporting key elements in the utilisation of the mobile crane area of the business.

During the 2022/2023 financial year (and ongoing), Titan Group engaged with external suppliers through several types of contracts ranging from short term to long term contractual arrangements. Where possible Titan Group engaged with suppliers that are Australian owned and known to our operations.

This engagement of suppliers further extended to significant allocation of work to wholly ingenious owned companies.

For all the suppliers that Titan Group engage on a regular basis, 95% are based in Australia and local to the offices in each state. Where Titan Group use engage suppliers that are outside of Australia and New Zealand, these suppliers are used as there is no local alternative and the commodity supplied is unique and cannot be otherwise sourced. Additionally, these suppliers are all subject to critical review and have enjoyed long-term agreements and relationships with our operations.

When engaging with any new suppliers, we ensure that the agreements between both parties addresses the risk of modern slavery. Titan has a supplier due diligence questionnaire that is to be completed by each supplier as part of the onboarding process. No supplier is accepted with Titan Group if they are potentially exposed to Modern Slavery. This initial engagement requires the supplier to declare any exposure to Modern Slavery and to provide their Modern Slavery Policies.

Modern Slavery Risks

As part of the construction industry, Titan Group recognised that as an Australian owned and operated organisation, modern slavery may impact the way operations and activities are conducted and are viewed. Titan Group endeavour to reduce the risk of modern slavery throughout the operations and its supply chains.

As a business that supplies plant and equipment to Construction sites in Australia and New Zealand, all the employees are locally based which mitigates the risk of modern slavery within our direct business operations.

Titan Group as part of its ISO certification across the Integrated Management System (IMS), conducts scheduled internal and external audits on supplier and the supply chain processes designed to check quality, cost, fit for purpose, but moreover to ensure modern slavery does not form part of a process that can be linked back to Titan Group.

Titan Group, further are subject to the Certification and Surveillance Audits conducted by Atlas as the IMS ISO auditor and certifier. Part of the Atlas scope of works within that audit is to ensure Titan Group have implemented the appropriate robust systems designed to eliminate any potential risks of modern slavery across the business. Figure 1, also captured across document header provides evidence to a compliant system designed to eliminate any risk of modern slavery.



Figure 1.

Risk Assessment Methodology

Titan Group have developed a risk assessment methodology which considers several indicators of modern slavery risks including:

- Sector and Industry
- Products and Service
- Geographical Location
- Specific Entity Risk

On initial risk assessment based on the above indicators, our operations and supply chain, Titan Group has a low potential for Modern Slavery risks.

Figure 2. Below is a summary of Titan Groups Modern Slavery risk profile.

Risk	Description of Potential Risk
Sector/Industry	There is a risk of the potential for modern slavery practices within the supply chain. Spare parts for the Tower Cranes and Man/Material Hoists can be sourced via overseas suppliers including China. These spare parts during the manufacturing phase may be exposed to unskilled workers and relaxed labour and safety regulations.
Product/Service	There is a low risk of potential modern slavery practices in the procurement of raw materials to develop the components of the tower cranes and hoists. Where possible, 90% of the materials are sourced within Australia. If the product is not able to be sourced within Australia, Titan group utilises suppliers outside of Australia that have had long standing relationship. These suppliers outside of Australia are generally the Original Equipment Manufacturer (OEM) for the Tower Cranes and Hoists.
Geographic	Due to the workforce located in Australia and New Zealand, risk level is very low. All workers sign onto an agreed contract and is in compliance to the Fair Work Commission. Australia and New Zealand have relatively low rates of Modern Slavery risks and all employees are paid in line with their contractual agreement and/or industrial instrument.
Specific Entity Risk	There may be some organisations that pose a risk to modern slavery, especially in at-risk countries around the world due to their known poor human rights and/or employment conditions. With Titan stringent onboarding of any suppliers, there is no identified organisations that poses any risk.

Figure 2.

World events, Pandemic and Other External Influences.

Titan Group acknowledges that there is a potential increased risk of modern slavery within the supply chains due to the ever-changing events, including but not limited to international conflicts, international financial influence, pandemics, and other external influences (Weather, shipping delays, conflicts). These influences may place additional pressure on its suppliers/manufacturers and their workforce. Increased risk of Modern Slavery because of an external factor can potentially lead to:

- Loss of income
- Increased working hours/decrease of working conditions
- Skilled worker shortage/increased unemployment
- Business risk
- Negative social factors

Titan Group closely monitors any potential external influences both in Australia and its International markets where it may impact on its supply chain. To address the above potential risks, Titan Group where possible engages in ongoing consultation, sources spare parts, and utilises its locally based suppliers to ensure the continual growth of the organisation.

Actions Taken to Assess and Address Risk

Titan Group actively participates in reducing risk of modern slavery and improving ethical and social standards within the industry which it operates in.

During the risk analysis to Modern Slavery, we ensure that all potential risk factors are addressed as soon as they have been identified. If we become aware of any violations, we take the appropriate actions and measures to ensure that the supplier(s) is compliant including remedial measures and ongoing support.

Titan Group will terminate a business relationship/contract if there is a direct violation to the Code of Conduct and terms of the agreement.

Titan Group has a stringent onboarding process for all suppliers to ensure they comply and adhere to the specifications identified in the supplier agreements. Upon initial assessment, suppliers are required to disclose any potential risk to modern slavery, if there is any risk, the Procurement Department will assess and take necessary action.

Titan Group expect all suppliers to have anti-slavery policies in place with a good understanding across the organisation.

Due to this strict process, there has been no violations to the agreements and risk of Modern Slavery.

Assessing the Effectiveness of Actions Taken

Titan Group is committed to ensure that all intended actions implemented are effective to reduce all modern slavery risks throughout the supply chain. As indicated in the Integrated Management System, we adapt the following Plan Do Check & Act (PDCA) model:

requirements of the standards and to achieve all intended outcomes.

- **Plan** – establish objectives and make plans (analyse the organization's situation, establish overall objectives and set interim targets and develop plans to achieve them).
- **Do** – implement plans (do what is planned to).
- **Check** – measure results (measure/monitor how far the actual achievements meet the planned objectives).
- **Act** – correct and improve plans and how they are put them into practice (correct and learn from mistakes to improve plans to achieve better results next time).

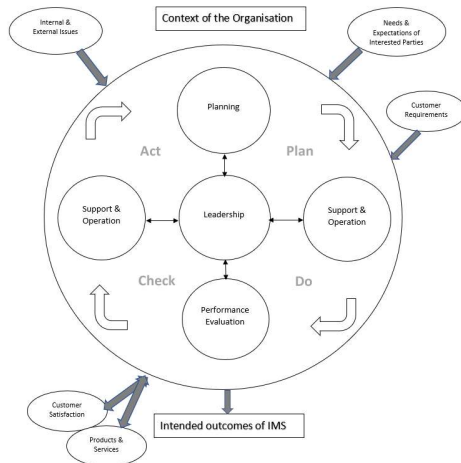


Figure 3.

Titan Group will ensure that the following evaluation actions are completed throughout the 2023-2024 period:

- Conduct an annual review of our modern slavery processes with the Executive Leadership Team to outline whether the business has identified and evaluated potential modern slavery risks.
- Conducting regular supplier auditing of our suppliers to ensure that there is strict compliance to the Terms and Conditions of the supplier agreement and disclosure of modern slavery risk factors. These audits will be conducted on an annual basis or where determined based on their risk factor.
- When onboarding any new suppliers and completion of the supplier questionnaire, key personnel will review to ensure that existing risk management processes remain appropriate.
- Assessing the completion of all acknowledgement of the Titan Group Modern Slavery policy.

Consultation

Each stakeholder within the Titan Group adapts and embraces the overarching policies, procedures and the Integrated Management System. This allows the organisation to have a common goal and strive for success in the future in all aspects of its operations. Each stakeholder applies the consistent approach through the above information to Modern Slavery and reducing its risk.

Future Focus

Titan Group is committed to continual improvement of our policies/procedures and operations in the identification and assessment of Modern Slavery risks.

Moving forward, Titan Group is committed to the following to progress in reducing its risk to Modern Slavery:

- Improvement opportunities on the Due Diligence processes and declaration on introducing new suppliers and embracing existing suppliers to the Titan Group standard. This will be achieved via completion of questionnaires and engagement with suppliers' expectations.
- Developed of training programs for key personnel within the organisation.
- Implementation and dissemination of our policy – **Refer to Figure 4.**

Anti – Modern Slavery Policy

Purpose

The purpose of this policy is to ensure Titan Group’s commitment to utilising ethical suppliers and ensuring that any modern slavery risks in our supply chain are identified and that steps are taken to address these risks.

Scope

Titan Group has a zero-tolerance approach to all forms of modern slavery within its business and within its supply chain. They are committed to acting ethically and with integrity in all their business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place in its own business, or in any of its supply chains.

Modern slavery means conduct which would constitute:

- (a) An offence under Division 270 or 271 of the Criminal Code.*
- (b) An offence under either of those Divisions if the conduct took place in Australia.*
- (c) Trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime; and*
- (d) The worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).*

Steps Taken

To underpin our policy commitments, Titan shall endeavour to:

- Conduct risk assessments to determine which parts of our own business and which of our supply chains are most at risk from modern slavery so we can focus our efforts on those areas most ‘at risk’.*
- Where appropriate, as informed by our risk assessment, engage directly with new suppliers in respect of our anti-slavery policy to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses.*
- We also make provision for our contracted suppliers to hold their own suppliers to the same standards.*

Compliance

Titan Group is committed to ensuring adherence to this policy as part of its goal in preventing, detecting, and reporting modern slavery in any part of the supply chain. Titan Group encourages all those working on the Company’s behalf to avoid any activity that might lead to, or suggest, a breach of this Policy.

Should you need to report of any instances of suspected unethical, illegal, corrupt, or undesirable conduct involving the Titan Group’s business, please refer to our Whistleblower Policy.

This statement was developed in consultation with key stakeholders within Titan Group and the Executive Leadership Team.

Approval

This statement was approved by Mr Damon Hanlin (Officer and Managing Director) and the Titan Group Executive Leadership Team (ELT) in their role as the Principal Governing Body of Titan Group.



Damon Hanlin

Managing Director

TITAN GROUP OF COMPANIES

- Titan Cranes and Rigging Pty Ltd (ABN 68 109 564 721)
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21st November 2023