



BROOKS

Australian Family Owned & Operated
Since 1979



Modern Slavery Statement 2025

Brooks Hire Service Pty Ltd
(ABN 20 008 975 988)

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Introduction

This Modern Slavery Statement has been prepared by **Brooks Hire Service Pty Ltd** ABN 20 008 975 988 (referred to in this Statement as **Brooks Hire Service**, **we**, **our** or the **Company**) in accordance with the *Modern Slavery Act 2018* (Cth) for the Financial Year ending June 2025 (FY25). It outlines the steps Brooks Hire Service has taken during the reporting period to assess and address the risks of modern slavery and human trafficking. This Statement reflects our ongoing commitment to ethical business practices and to protecting the dignity and rights of all individuals connected to our business.

Brooks Hire Service is part of the Brooks Group of Companies (collectively referred to in this Statement as **Brooks Group**). Established in 1979 by Douglas Brooks, our head office is located at 30 Coulson Way, Canning Vale, Western Australia. Brooks Hire Service specialises in the dry hire of machinery and plant to the mining and construction sectors. Today, we are one of the largest privately owned construction equipment hire companies in Australia, operating across 23 branches nationwide and employing approximately 320 full-time and part-time staff.

Brooks Hire Service is committed to conducting business with integrity, transparency, and respect for human rights. We recognise our responsibility to take meaningful action in identifying, preventing, and addressing modern slavery risks within our operations and supply chains. To support this, we have implemented—and continue to strengthen—our policies, procedures, and practices aimed at minimising the risk of modern slavery occurring in any part of our operations and supply chains.

Structure, Operations & Supply Chains

Business Structure

Brooks Hire Service is the primary reporting entity within the Brooks Group of Companies, a diversified group operating across multiple sectors in Australia. Brooks Hire Service is a privately owned Australian company specialising in the dry hire of construction and earthmoving equipment.

Brooks Group is organised into multiple divisions, with each entity operating across the following sectors:

Sector	Entity Name	ABN
Construction & Mining	Brooks Hire Service	20 008 975 988
	Brooks Access	78 648 186 065
	Brooks Cranes	79 652 678 772
	Brooks Equipment Sales	92 455 723 027
	Brooks Fleet	47 677 368 633
	Brooks Mining	89 677 376 975
	Brooks OBR MAIA	39 668 842 537
	Brooks Parts	86 670 668 461
	Brooks Site Services	87 677 376 966
	Brooks Transport	85 647 909 519
Airline Services	Aus West Airlines	47 141 683 114
	Medical Air Ambulance	11 163 275 581
Financial Services	Brooks Finance	53 662 153 139

Brooks Group's integrated structure allows for the sharing of expertise, resources, and services across industries, while maintaining a commitment to ethical operations and corporate responsibility in all areas of business.

Operations

Brooks Hire Service operates solely within Australia across all states and territories, excluding Tasmania. Providing dry hire solutions for construction and earthmoving equipment to a wide range of industries, including mining, civil construction, infrastructure, and government sectors. With a network of 23 branches nationwide, Brooks Hire Service supports projects in both metropolitan and remote regional locations.

Our core operations include the supply and maintenance of an extensive fleet of modern machinery and vehicles, including excavators, loaders, dozers, graders, rollers, water trucks, and more. These assets are supported by a comprehensive service infrastructure, including mobile field service units and dedicated maintenance teams to ensure equipment reliability and safety.

Brooks Hire Service also works closely with other divisions within the Brooks Group to offer integrated solutions, such as transport logistics, site services, parts supply, and access equipment. Through these operations, we engage a wide network of suppliers, subcontractors, and service providers, both locally and internationally.

Brooks Hire Service is committed to upholding high standards of safety, environmental management, and ethical business conduct across all aspects of its operations.

Supply Chain

Brooks Hire Service engages a diverse range of suppliers to support its operations across Australia. Our supply chain primarily involves automotive parts and machinery, products and services for the automotive industry, and materials and services required for branch operations. The Company maintains relationships with approximately 800 suppliers and has engaged iPro to assist with completing comprehensive risk assessments across the Brooks Group supply chain.

Our suppliers operate across a wide range of sectors, including:

- Accommodation and Food Service Activities
- Administration and Support Services
- Agriculture, Forestry, and Fishing
- Arts, Entertainment and Recreation
- Building services contractor
- Cleaning
- Construction
- Domestic work
- Education
- Electricity, Gas, Steam and A/C supply

- Finance and Insurance
- Government administration, Defence and Social Security
- Health and Social Work
- Information and Communication
- International organisations, Diplomatic and Consular Services
- Labour hire
- Maintenance and Repair of motor vehicles
- Manufacturing
- Mining and Quarrying
- Personal services
- Professional and Scientific Services
- Real estate
- Retail
- Security services
- Transportation and Storage
- Water supply, Sewerage and Waste Management
- Wholesale

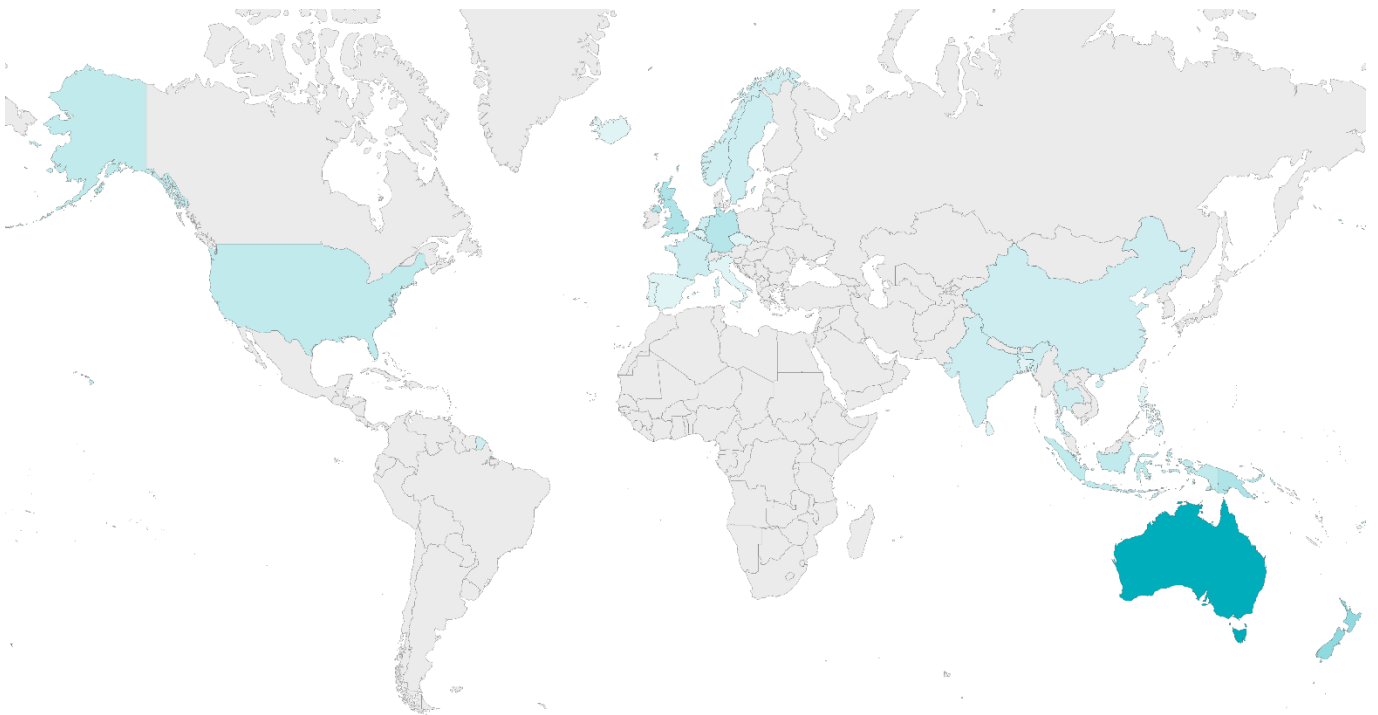
All suppliers providing direct services to support branch operations are Australian-based. The majority of our machinery and parts suppliers are indirect suppliers who source materials and products from international manufacturers located in countries such as China, Italy, Japan, and the United States.

Brooks Hire Service's suppliers operate across multiple regions globally, including:

- Australia
- Bangladesh
- Belgium
- China
- Czech Republic
- Fiji
- France
- Germany
- Hong Kong
- Iceland
- India
- Indonesia
- Italy
- Luxembourg
- Netherlands
- New Zealand
- Norway
- Papua New Guinea

- Philippines
- Portugal
- Samoa
- Singapore
- Spain
- Sri Lanka
- Sweden
- Thailand
- United Kingdom of Great Britain and Northern Ireland
- United States of America

The infographic below illustrates a heatmap of Brooks Group's suppliers, with the majority located within Australia.



Risks of Modern Slavery in our Operations and Supply Chains

Modern slavery refers to various forms of exploitation and coercive practices that deprive individuals of their freedom, rights, and dignity. It encompasses situations where individuals are forced or coerced into labour, servitude, or human trafficking against their will. Modern slavery can take different forms, including forced labour, debt bondage, forced marriage, human trafficking, and child labour.

The International Labour Organisation estimates that over 50 million people around the world are victims of modern slavery. In recent years, supply chain transparency is a key policy strategy used by governments to identify and prevent business practices that lead to modern slavery.

Operations

Recognising that certain sectors in which Brooks Hire Service operates may present a higher risks of modern slavery practices, we continue to work closely with iPro and our suppliers to identify, assess and manage these risks. Brooks Group considers it has a low risk of Modern Slavery practices occurring within its operations because:

- Brooks Group's operations are solely within Australia.
- Brooks Group has implemented policies and procedures that are in line with Australian laws, which include the *Fair Work Act*, *Modern Slavery Act* and the *Work Health & Safety Act*.
- All employees, visitors, contractors and suppliers are able to report any concerns directly to Brooks Group via the company's *Whistleblowers Policy*.















To minimise the risk of Modern Slavery within our operations, we conduct supply chain risk assessments, maintain transparency with key suppliers, and prioritise engagement with suppliers that demonstrate ethical labour practices and compliance with applicable modern slavery legislation.

Supply Chain

Our suppliers operate, produce, and source good and services across a range of sectors, some of which can be considered high-risk. High-risk sectors are those in which human trafficking activities are known to occur and were identified in the *Global Estimates of Modern Slavery* and child labour exploitation that were separately identified in *Child Labour: Global Estimates 2020 Trends and the Road Forward* (ILO and UNICEF, 2021).

The below graphics show the high-risk sectors of operation, production, and sourcing for our suppliers who have participated in our survey. The numbers in the following graphics describe how many suppliers are in the corresponding sectors.

Suppliers Operating in High Risk Sectors

 Accommodation and Food Service Activities 3	 Agriculture, Forestry, and Fishing 15
 Building services contractor 20	 Cleaning 20
 Construction 42	 Domestic work 2
 Labour hire 8	 Maintenance and Repair of motor vehicles 73
 Manufacturing 47	 Mining and Quarrying 36
 Retail 35	 Security services 2
 Transportation and Storage 19	 Wholesale 24

Suppliers Providing Goods and Services in the following High-risk Sectors



Accommodation and Food Service Activities

10



Agriculture, Forestry, and Fishing

28



Building services contractor

30



Cleaning

23



Construction

65



Domestic work

8



Labour hire

6



Maintenance and Repair of motor vehicles

83



Manufacturing

51



Mining and Quarrying

74



Personal services

2



Retail

30



Security services

5



Transportation and Storage

28



Wholesale

18

Suppliers who Source Goods and Services from the following High-risk Sectors



Accommodation and Food Service Activities

9



Agriculture, Forestry, and Fishing

8



Building services contractor

18



Cleaning

26



Construction

32



Labour hire

7



Maintenance and Repair of motor vehicles

74



Manufacturing

53



Mining and Quarrying

28



Personal services

1



Retail

34



Security services

8



Transportation and Storage

24

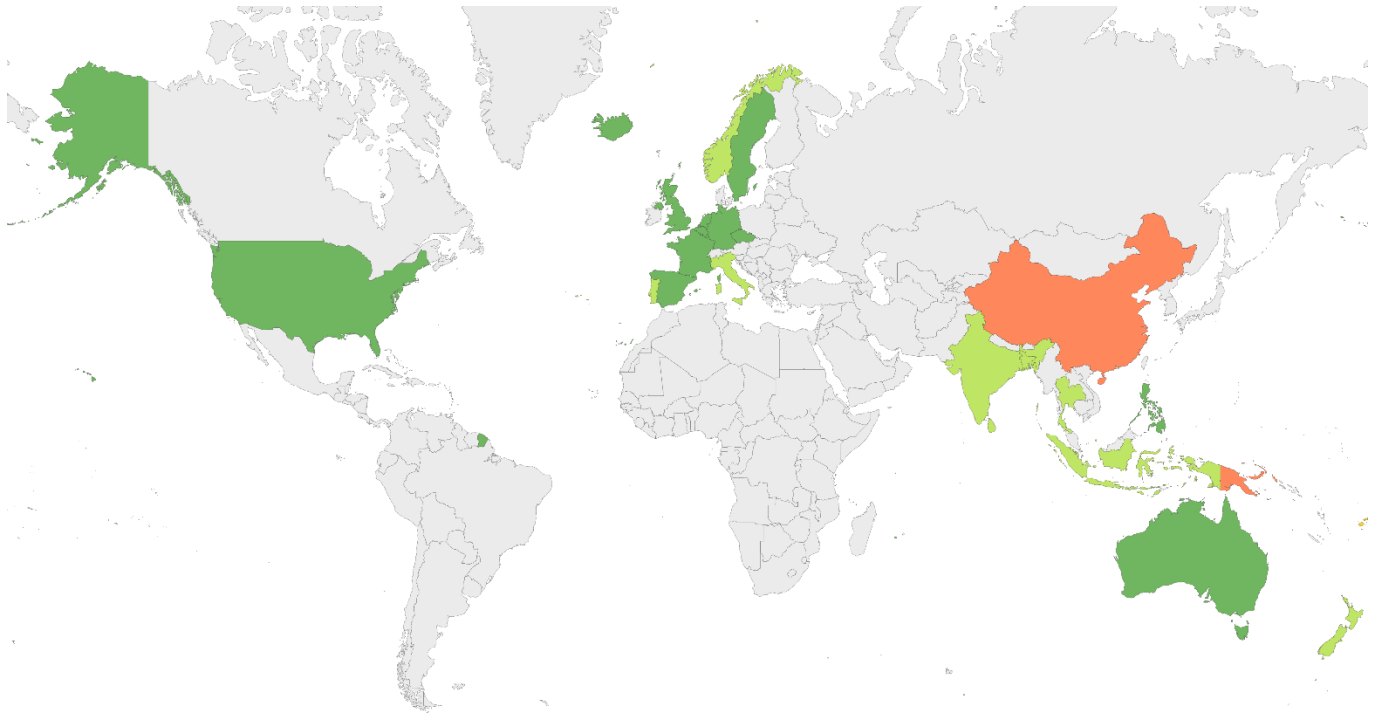


Wholesale

35

In some of countries or regions where our suppliers operate, they can be described as high-risk due to the possibility of a link to human trafficking.

The geographical regions where our supply chain partners operate are shown in the map below. This map has been overlaid with the colour tier system of the [Trafficking in Persons Report](#). For the full list of countries and tier groups, refer to Appendix 1.



Some goods and services produced and sourced by our suppliers can be described as high-risk due to the possibility of a link to modern slavery practices such as forced labour and child labour.

The geographical regions where our supply chain partners produce and source goods and services that are considered high risk are shown in the maps below.

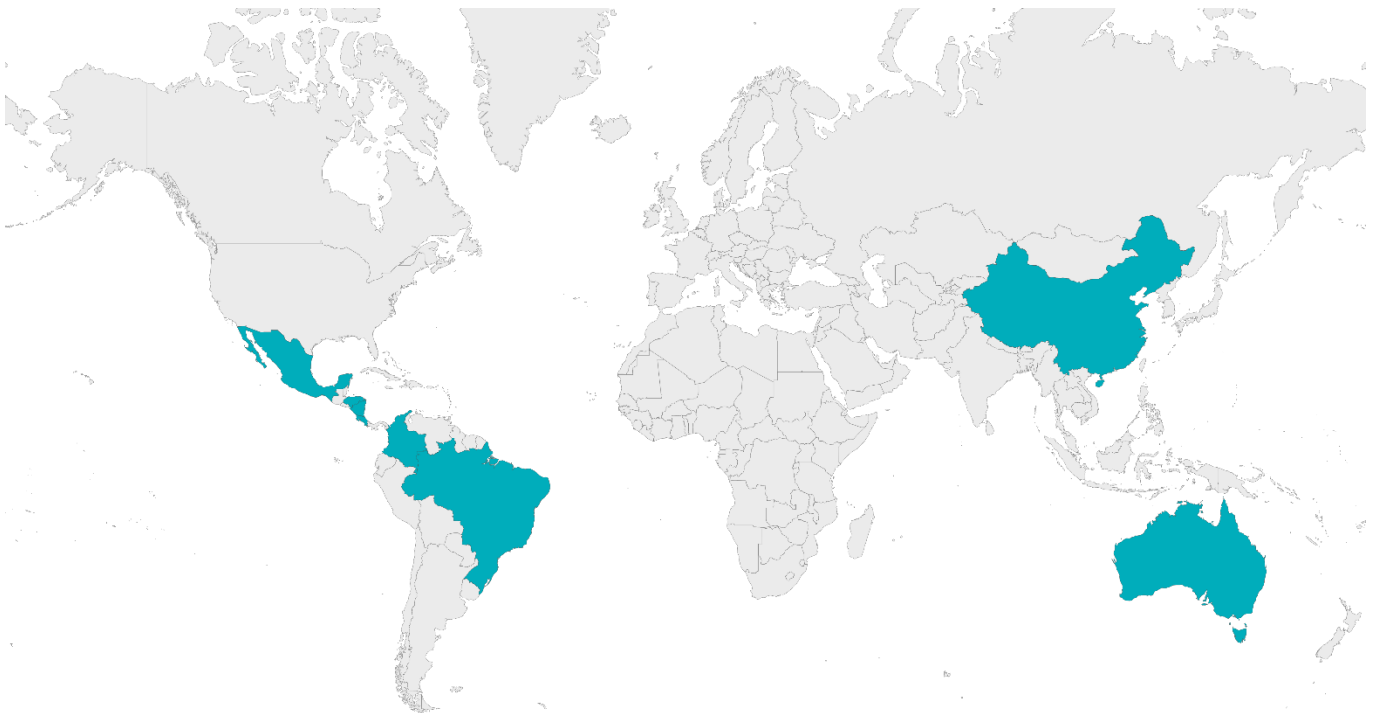
There is modern slavery risk associated with producing the following goods and services from the countries below:

- Australia
 - Building services contractor
 - Cleaning
 - Labour hire
 - Security services



There is modern slavery risk associated with sourcing the following goods and services from the countries listed below:

- Australia
 - Building services contractor
 - Cleaning
 - Labour hire
 - Security services
- Brazil
 - Coffee
- China
 - Electronics
 - Solar Modules
- Colombia
 - Coffee
- Costa Rica
 - Coffee
- Honduras
 - Coffee
- Mexico
 - Coffee
- Nicaragua
 - Coffee



Actions to Assess and Address Risks

Assess

Brooks Hire Service uses a third-party tool, the [iPRO Modern Slavery Assessment Tool](#) (MSAT) to assess modern slavery risks in our operations and supply chain. The risks identified in the previous section were all identified utilising this assessment tool. We engaged iPRO during the 2025 Financial Year reporting period to conduct the assessments on our operations and of 708 of our suppliers. We intend to carry this process forward as an annual assessment of our operations and supply chain.

Brooks Hire Service and participating suppliers were asked to complete a self-assessment questionnaire online. After each supplier completed and submitted the questionnaire, their responses were assessed to determine their modern slavery risk scores and associated risk category.

Each supplier that completed the assessment was assigned one of the following risk categories:

- High-risk (high levels of inherent risk)
- High-risk (inadequate risk control)
- Medium-risk (partial risk control)
- Low-risk (adequate risk control)
- Low-risk (low levels of inherent risk)

To determine the appropriate risk category, responses were first evaluated for risks inherent to a supplier's operations, production, and sourcing. This is referred to as the Inherent Risk Score. The Inherent Risk Score was calculated based on the geographical, type of goods, industry sector, and workforce parameters that the supplier indicated in the Modern Slavery Assessment Tool (MSAT).

Next, the Unmitigated Risk Score was evaluated. This score was calculated based on the policy and procedure responses on the questionnaire. A supplier's Unmitigated Risk Score determined whether they were categorised as having inadequate, partial, or adequate risk control.

Then, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain.

Brooks Hire Service also completed the self-assessment using iPro's MSAT to determine a risk category for our operations. Additionally, we conduct due diligence relating to modern slavery risks by utilising the iPRO MSAT as part of our new supplier procurement process. As an additional due diligence step, the tool allows us to ask suppliers to upload documentation to support their assessment responses.

No instances of Modern Slavery have been reported in FY25.

Address

Operations

Following the post-assessment of iPro's MSAT, Brooks Hire Service received several action items to reduce the unmitigated risks identified within our operations. These actions include providing staff training and implementing policies and procedures that fall under the 'Modern Slavery Umbrella', such as a *Migrant Worker Policy* and a *Supplier Code of Conduct*.

The identified gaps in our operational modern slavery risk management have already been addressed through the implementation of the actions.

Supply Chain

Suppliers that completed the self-assessment were given action items to complete post-assessment. The action items provided to each supplier were based on their responses to the questionnaire, and if implemented, will reduce the unmitigated risks identified during the assessment.

Action items were also aggregated, giving Brooks Hire Service a focused view of the most impactful actions that could be taken by suppliers across the supply chain.

We have started rolling out a supplier follow-up initiative to further discuss the action items and address the risks identified through the assessment. Primarily this involves ensuring that suppliers have the right policies and procedures in place to mitigate inherent risks in their business.

Brooks Hire Service remains committed to ensuring that our suppliers uphold fair and safe working conditions and that no form of forced, bonded, or child labour is used in any part of our supply chain. Where potential risks or non-compliances are identified, the Company will take appropriate actions, including supplier engagement, remediation, or termination of the supplier relationship if necessary.

Measuring Effectiveness

We utilise the benchmarking and KPI's in the iPRO Modern Slavery Assessment Tool to assess the effectiveness of our actions. As this is the first year we have used the platform to conduct our assessments and due diligence, we will be able to objectively measure the effect when the assessments are completed during the next reporting period.

The main KPI's we are using to benchmark our efforts are the risk scores that are generated as part of the assessment process.

Each organisation who completed the assessment questionnaire was assessed and given 2 risk scores.

- Inherent Risk Score
- Unmitigated Risk Score

The Inherent Risk Score measures modern slavery risks that are intrinsic/built-in to the operations of an organisation. This is determined by asking which countries, regions, sectors, and high-risk goods are part of their operations, production, or supply chain.

The Unmitigated Risk Score measures the organisations risk that is still present (remains) after accounting for modern slavery risk controls that have been implemented. This is determined by asking suppliers about the policies, processes, and procedures in place to reduce modern slavery risks.

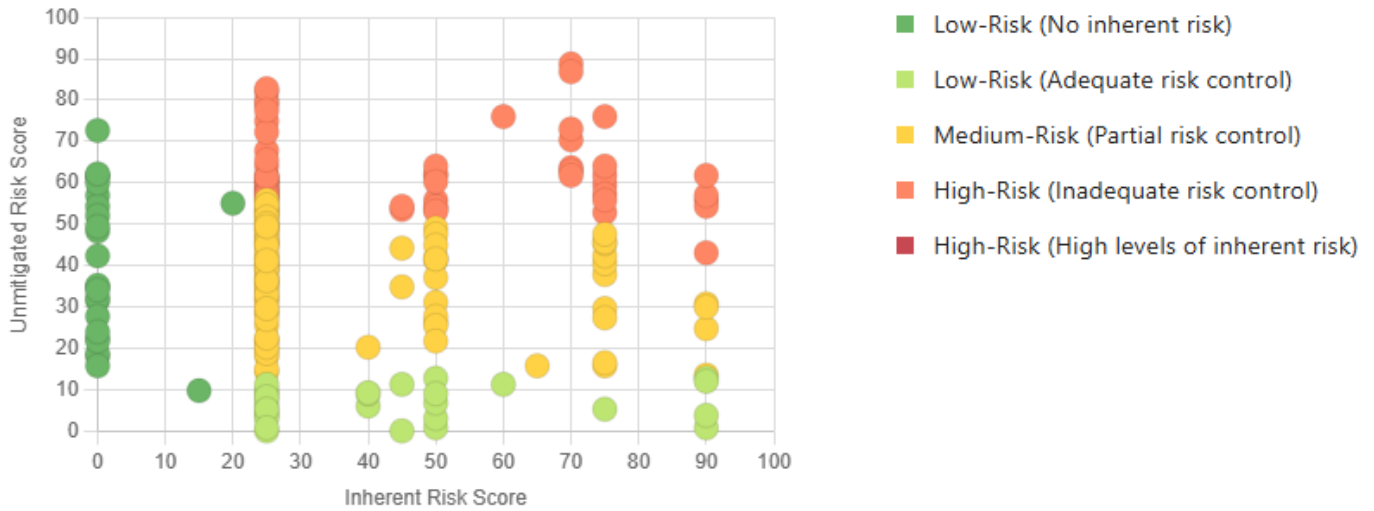
We also measure the effectiveness of our engagement with suppliers and will continue to encourage participation in our assessment programme to better identify and mitigate modern slavery risks in our supply chain.

Financial Year 2025 KPI's

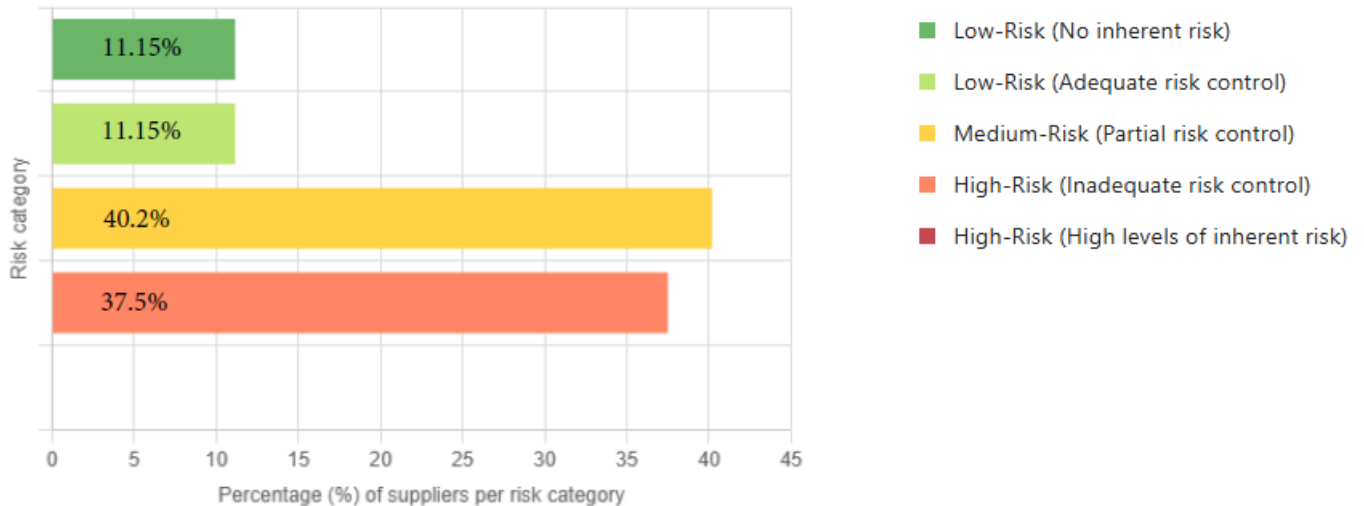
Brooks Hire Service's inherent risk score was assessed as extremely high, reflecting the risk profile associated with the industry in which the company operates. However, through the implementation of due diligence measures, the unmitigated risk score was reduced to high risk. We aim to continuously improve on these KPI's.

As we take actions within our organisation, and with our suppliers, we will be able to assess the effectiveness of our modern slavery action plan to reduce the Unmitigated Risk Score by implementing all the policies and procedures that fall within the scope of modern slavery, providing modern slavery training to all employees, introduce mandatory reporting of iPro MSAT to new suppliers of Brooks Group and extending the iPro MSAT to existing suppliers of Brooks Group.

The graph below indicates the inherent risk scores of our suppliers.



The graph below indicates the unmitigated risk scores of our suppliers.



On average, our suppliers have partial risk control.

Supplier Assessment Completions	
Completions	286 / 708
Completion Rate	40.4%

Consultation Process

Brooks Hire Service is the principal governing entity of the Brooks Group. All divisions within the Group are required to adhere to the governance framework established by Brooks Hire Service to ensure consistent expectations and raise awareness when assessing and addressing modern slavery risks across its operations and supply chains.

To strengthen this approach, Brooks Hire Service has partnered with iPro to utilise their Modern Slavery Assessment Tool and gain expert guidance in identifying and managing areas of potential risk within our operations and supply chain.

Other Information

Our assessment and analysis are informed by credible sources, including the *Global Slavery Index*, the International Labour Organization (ILO), and Australian Government agencies such as the Anti-Slavery Commissioner's Office and the Attorney-General's Department.

This statement has been approved by the Board of Directors of Brooks Hire Service Pty Ltd.



Stuart Brooks
Managing Director



Douglas Brooks
Chief Executive Officer

Appendix 1: Tier Placements and Regional Maps

Tier 1

Argentina	Canada	Estonia	Iceland	Poland	Taiwan
Australia	Chile	Finland	Korea, Republic of	Seychelles	United Kingdom
Austria	Colombia	France	Lithuania	Singapore	United States of America
Bahamas, The	Cyprus	Georgia	Luxembourg	Spain	
Bahrain	Czech Republic (Czechia)	Germany	Netherlands, The	Suriname	
Belgium	Denmark	Guyana	Philippines	Sweden	

Tier 2

Albania	Cabo Verde	Guinea	Malaysia	Pakistan	Switzerland
Angola	Cameroon	Honduras	Mauritania	Palau	Tanzania
Antigua and Barbuda	Comoros	Hungary	Mauritius	Panama	Thailand
Armenia	Congo, Democratic Republic of	India	Mexico	Paraguay	Timor-Leste
Aruba	Costa Rica	Indonesia	Micronesia, Federated States of	Peru	Togo
Azerbaijan	Cote d'Ivoire	Iraq	Moldova	Portugal	Tonga
Bangladesh	Croatia	Ireland	Mongolia	Qatar	Trinidad and Tobago
Barbados	Ecuador	Israel	Montenegro	Romania	Tunisia
Belize	Egypt	Italy	Morocco	Saudi Arabia	Turkey (Türkiye)
Bhutan	El Salvador	Jamaica	Mozambique	St. Lucia	Uganda
Bolivia	Eswatini	Japan	Namibia	St. Vincent and the Grenadines	Ukraine
Bosnia and Herzegovina	Ethiopia	Jordan	New Zealand	Senegal	United Arab Emirates
Botswana	Gambia, The	Kazakhstan	Nigeria	Sierra Leone	Uzbekistan
Brazil	Ghana	Kenya	North Macedonia	Slovakia	Vietnam
Bulgaria	Greece	Kosovo	Norway	Slovenia	Zambia
Burundi	Guatemala	Latvia	Oman	South Africa	
		Lesotho		Sri Lanka	
		Malawi			

Tier 2 Watch List

Algeria	Congo, Republic of	Fiji	Laos	Malta	Solomon Islands
Benin	Curaçao	Gabon	Lebanon	Marshall Islands	Tajikistan
Burkina Faso	Dominican Republic	Guinea-Bissau	Liberia	Nepal	Uruguay
Central African Republic	Equatorial Guinea	Hong Kong	Madagascar	Niger	Vanuatu
Chad		Kuwait	Maldives	Rwanda	Zimbabwe
		Kyrgyzstan	Mali	Serbia	

Tier 3

Afghanistan	Cambodia	Eritrea	Macau	South Sudan	Syria
Belarus	China	Iran	Nicaragua	Sint Maarten	Turkmenistan
Brunei	Cuba	Korea, Democratic People's Republic of	Papua New Guinea	Sudan	Venezuela
Burma	Djibouti		Russia		

Special Case

Haiti	Libya	Somalia	Yemen
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The tier groups are broken down into the following classification:

■ **Tier 1**

Countries whose governments fully meet the Trafficking Victims Protections Act's (TVPA) minimum standards for the elimination of trafficking.

■ **Tier 2**

Countries whose governments do not fully meet the TVPA's minimum standards but are making significant efforts to bring themselves into compliance with those standards.

■ **Tier 2 Watch List**

Countries whose governments do not fully meet the TVPA's minimum standards but are making significant efforts to bring themselves into compliance with those standards, and for which:

- the *estimated number* of victims of severe forms of trafficking is very significant or is significantly increasing and the country is not taking proportional concrete actions;
- there is a failure to provide evidence of *increasing efforts* to combat severe forms of trafficking in persons from the previous year, including increased investigations, prosecutions, and convictions of trafficking crimes, increased assistance to victims, and decreasing evidence of complicity in severe forms of trafficking by government officials.

■ **Tier 3**

Countries whose governments do not fully meet the TVPA's minimum standards and are not making significant efforts to do so.

The TVPA, as amended, lists additional factors to determine whether a country should be on Tier 2 (or Tier 2 Watch List) versus Tier 3:

- the extent to which the country is a country of origin, transit, or destination for severe forms of trafficking;
- the extent to which the country's government does not meet the TVPA's minimum standards and, in the extent to which officials or government employees have been complicit in severe forms of trafficking;
- reasonable measures that the government would need to undertake to be in compliance with the minimum standards in light of the government's resources and capabilities to address and eliminate severe forms of trafficking in persons;
- the extent to which the government is devoting sufficient budgetary resources to investigate and prosecute human trafficking, convict and sentence traffickers; and obtain restitution for victims of human trafficking; and
- the extent to which the government is devoting sufficient budgetary resources to protect victims and prevent the crime from occurring.