



CLARK EQUIPMENT WHS MANAGEMENT SYSTEM

Modern Slavery Act Policy (Statement)

WHS-POL-013

POLICY TITLE PAGE

TITLE: MODERN SLAVERY ACT POLICY (STATEMENT)

DOCUMENT NO: WHS-POL-013

ISSUE: 1

DATE OF ISSUE: 31.10.2024

APPROVER: CLARK EQUIPMENT GROUP – CEO

APPROVED: *R. Hammett* **DATE:** 31.10.2024

REVISION STATUS

REVISION	PAGE NO.	REVISION DESCRIPTION	DATE
0		DRAFT for comment	09.09.2020
1		Reporting Period 01.07.2019 – 30.06.2020	21.03.2021
2		Reporting Period 01.07.2021 – 30.06.2022	30.06.2021
3		Reporting Period 01.07.2022 – 30.06.2023	30.06.2023
4		Reporting Period 01.07.2023 – 30.06.2024	31.10.2024

CONTROLLED COPY STATUS

(Not controlled if printed)

HOLDER	
COPY	LOCATION
Master	Technical Manager
Electronic (.pdf)	'clarksvr' under WHS\WHS Management Systems \
Master Electronic (.doc)	Technical Manager



CLARK EQUIPMENT WHS MANAGEMENT SYSTEM

Modern Slavery Act Policy (Statement)

WHS-POL-013

CONTENTS

1 Intent 3

2 Scope 3

3 References 3

4 Reporting Entity 3

5 Structure and Operation 3

6 Risks in Operation and Supply Chain 4

7 Actions to Address Modern Slavery Risks 4

8 Verification of the Effectiveness of the Actions 5

9 Consultation Process 5

10 Directors Approval 5



CLARK EQUIPMENT WHS MANAGEMENT SYSTEM

Modern Slavery Act Policy (Statement)

WHS-POL-013

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 all 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 supplier 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, 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 WHS MANAGEMENT SYSTEM

Modern Slavery Act Policy (Statement)

WHS-POL-013

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 distributor of plant and equipment, it is important that we understand how our supply chains can be linked to modern slavery within our country and the Asia-pacific countries we service.

As an employer of so many people across a range of locations and activities, we risk violation of labour rights and engaging in excessive work hours, both for our own businesses and that of our suppliers.

As a global buyer, we risk obtaining supply from countries reported to have a prevalence of modern slavery in its various forms.

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. COVID-19 has significantly disrupted this process as it is not possible to attend and review all current 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. With the continued COVID-19 pandemic, this has been restricted significantly.

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.



CLARK EQUIPMENT WHS MANAGEMENT SYSTEM

Modern Slavery Act Policy (Statement)

WHS-POL-013

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.

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 2023 to 30 June 2024

END