

MODERN SLAVERY STATEMENT

Onsite Rental Group Limited
1/83 Egerton Street Silverwater NSW 2128

Document owner: Board
Version: 1.0
Date issued: December 2022

MODERN SLAVERY STATEMENT

Onsite Rental Group Limited ACN 126 396 852

1. Purpose.....	2
2. Structure and Operations.....	3
3. Supply Chain & Risks of Modern Slavery Practices	3
4. Development of Policies and Processes	5
5. Assessing & Managing Modern Slavery Risks	6
6. Measuring the effectiveness	7
7. Consultations and Continuous Journey	8

1. Purpose

Onsite Rental Group and its related parties (**Onsite**) respect the rights of every individual to a life free from all forms of slavery. We stand firmly against the use of or exploitation of individuals for personal or commercial gain and expect the same standards of behaviour from our business partners.

As a business, we have a national footprint and a strong presence in regional and remote areas across Australia. Onsite is committed to ensuring its workforce is diverse, inclusive and strongly connected to the communities close to its branches. This commitment is also seen in Onsite’s choice of business partners and suppliers which include various smaller local organisations.

Onsite recognises the prevalence of exploitive practices globally, and the complexities involved in identifying and addressing the risks of modern slavery practices in supply chains. We are aware that the path to eliminating such practices is to educate, collaborate with and actively promote ethical behaviours and standards in all aspects of its operations and supply chain.

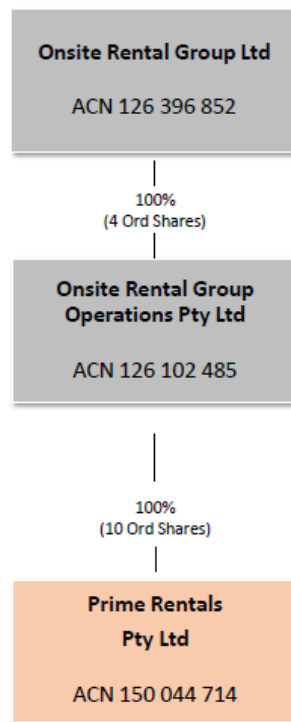
Our Modern Slavery statement captures the actions and initiatives taken by Onsite to promote stronger, more ethical practices throughout its business, thereby contributing to the global movement to stamp out slavery and exploitation.

Our statement is written on behalf of Onsite Rental Group Limited as a single reporting entity incorporating the operations of its wholly owned subsidiaries:

- Onsite Rental Group Operations Pty Ltd ACN 126 102 485
- Prime Rentals Pty Ltd ACN 150 044 714

2. Structure and Operations

Onsite Rental Group Ltd is the parent company for the Onsite group of companies, and the overall structure of the group for the year ending 30 June 2022 is as set out below.



The operations and business of Prime Rentals Pty Ltd is controlled solely by Onsite Rental Group Operations Pty Ltd (**ORGO**), with ORGO actively taking steps towards ensuring that any legacy contracts held by that subsidiary are novated across to ORGO, in anticipation of ORGO deregistering the subsidiary.

While Onsite Rental Group Ltd is the parent company of ORGO, ORGO remains the primary trading entity under the control of its parent company. 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 and transparent feedback at 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.

3. Supply Chain & Risks of Modern Slavery Practices

Onsite is a specialist business to business equipment rental business and has been operating for over 30 years in the industry. Onsite provides employment to around 500 staff across over 35 branches and satellite branches. With over 70,000 pieces of equipment for hire, the branch offices are based in Western Australia,

South Australia, Queensland, Northern Territory, New South Wales and Victoria. Onsite's head office is based in Silverwater, NSW.

Onsite has taken steps to identify and address any actual or potential adverse impacts with which it may be involved whether directly or indirectly through its own activities or its business relationships. Onsite understands that the modern slavery risks depend on various factors, including the nature of the industry, the type of workforce which could be used, and the level of human rights protection and enforcement in the countries where the product or service is sourced, manufactured or provided.

Supply Chain

Machinery and Equipment

During 2022 Onsite has been identifying its key suppliers of machinery and equipment across all 5 of its product lines. The majority of the equipment is purchased from Australian suppliers, however USA, Canada, New Zealand, United Kingdom, China, Italy, Belgium, Spain, France, Romania, Indonesia, Japan and Vietnam were identified as the original source.

After its useful life, Onsite sells used equipment through auction houses or direct sales to Australian business and overseas with recent sales in 2022 to USA, Singapore, Hong Kong, Indonesia, Malaysia, Sri Lanka, Taiwan, Thailand, Vietnam and Colombia. Whilst Onsite does not knowingly engage or contribute to modern slavery practices, Onsite recognises that there may be parts of the purchase or sales to higher risk countries which make up components of our supply chain.

Work Force

Onsite's work force includes workers on work visas, who are citizens of India, Philippines, and South African locations. Onsite acknowledges the risks associated with engaging with and sourcing labour from countries that are deemed to have an increased risk of modern slavery or exploitive practices.

The contracts with workforce agencies have been reviewed for compliance with modern slavery legislation and that higher risk activity has been identified as one requiring further investigation and due diligence.

Additionally, Onsite outsources some information technology projects and purchases uniforms from countries based in Asia. This too has been identified as an area in Onsite's operations as an area requiring further investigation and due diligence.

Trades and Subcontracting

Onsite also procures services from the 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 are located in Australia.

Risks of Modern Slavery Practices

Onsite has identified the potential modern slavery risks for its business and its supply chains:

- On the construction sites – failure to provide a healthy and safe workplace;
- In certain industries e.g. transport – long hours of working;
- Manufacturers in the high-risk countries – child labour, forced labour, bonded labour;
- Manufacturers in the high-risk countries – unfair working conditions including underpayment and failure to provide employees entitlements;
- In the remote areas in Australia – inadequate housing conditions; long hours of working and unfair

working conditions

- Discrimination (including pay gap) based on gender, age, race, disability, sexual orientation, cultural background, religion, pregnancy, family responsibilities;
- Likely involvement of labour recruiters and other third-party agencies in the recruitment of workers.
- The potential for inadvertent occurrence of exploitive practices in Onsite's smaller suppliers who consider themselves exempt from the requirements of Modern Slavery Act 2018 (Cth).

4. Development of Policies and Processes

Ethical Business Policy in Onsite's Supply Chains

Onsite has developed the Ethical Business Policy as a tool to articulate the minimum standards of integrity, ethics and expectations of detecting and irradicating modern slavery throughout our supply chains. It has been integrated into contractual obligations and KPIs in our legally binding contracts with suppliers, contractors and customers.

Onsite engages with various parties which are subject to and covered by the Ethical Business Policy (including Onsite's suppliers, contractors and other business partners). Any such engagements are bound by contractual terms and conditions which includes expansive warranties in favour of Onsite verifying that their operations and supply chains are free from all forms of forced labour and slavery. There are also separate promissory statements and warranties by the parties (in favour of Onsite) verifying that they comply with the Modern Slavery Act 2018 (Cth). The parties are also required to establish processes and procedures as part of their business operations, including the reporting of the instances of unethical conduct (including forced labour and slavery and other breaches of human rights) and the remediation process to Onsite.

Workers' Policies and Welfare Arrangements

Onsite has in place various workers policies, arrangements and plans which reflect our commitment to maintain standards of integrity and ethics across areas including labour standards, human rights and workplace health and safety:

- Ethical Business Policy (Document No: HRM-PCY-03) which outlines our commitment to promoting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.
- Employee Discrimination, Harassment and Bullying Policy and Procedure (Document No.: HR.03.01PL)
- Leave Policy (Document No: HR200001PL)
- Flexible Working Arrangements (Document No.: HR.05.05.PL)
- Whistleblowers Policy (Document No.: HR.02.03.PL)
- HSEQ Policy and Manual (Document No.: HSEQ.01.01)
- Drug and Alcohol Policy and Procedure (Document No: HR.02.05.PL)
- Privacy Policy (Document No.: HR.02.02PL)
- Housing arrangement - this policy is to ensure that the agreement for the provision of Onsite sponsored housing for employees is in place
- Motor Vehicle Policy (Document No.: HR.05.02.PL) – this policy is to ensure the provision of motor vehicle as tool of trade
- Workplace Issue Resolution Procedure (Document No.: HR.02.01.PL) - this procedure aims to provide employees with the avenues available to have their complaints heard and promote fast and efficient resolution of workplace issues.

Reporting of Modern Slavery Concerns

Onsite has the grievance mechanism provided under the Workplace Issue Resolution Procedure (Document No.: HR.02.01.PL).

Onsite has in place the Ethical Conduct email hotline on Ethical.Conduct@onsite.com.au and the modern slavery email hotline on Modern.Slavery@onsite.com.au that allows employees, subcontractors, suppliers and clients to report instances of actual or suspected unethical conduct or breaches (including potential breaches) of any modern slavery obligations.

Onsite has a specialist external service provider (STOPline) as a whistleblowing channel that allows the stakeholders to report the concerns anonymously.

The mechanisms for Onsite's personnel and suppliers to raise concerns, grievances or notify Onsite of potential unethical conduct, including breaches of Modern Slavery legislation is highlighted in its Ethical Business Policy, a copy of which forms part of the onboarding process for all employees.

It is now also a requirement that new suppliers provide to Onsite a positive acknowledgement and commitment that they will comply with Onsite's Ethical Business Policy as a precondition to being set up as a vendor. This will ensure that all suppliers are aware of the mechanisms and avenues through which they can raise concern with Onsite.

Going hand in hand with that grievance mechanism, particularly as it relates to Modern Slavery compliance, is Onsite's commitment to work with its suppliers to bring about meaningful change, through a combination of education, rectification and deterrence.

If Onsite is made aware of a breach or a potential breach of Modern Slavery legislation, the steps taken will include:

- A deeper investigation into the facts and circumstances giving rise to the notification of a breach or a potential breach, which will include an opportunity being provided for the Supplier to respond to any queries/concerns and to provide additional information concerning the breach or potential breach;
- Issue of remediation actions required by Onsite setting out the actions to be undertaken by the Supplier and a specified timeframe for those actions to be completed, such timeframe being reasonable having regard to the circumstances, severity of the breach and extent of remediation actions to be undertaken;
- Ongoing consultation with the Supplier and disclosure of the breach or potential breach as required;
- Termination of engagement in the event the Supplier does not, despite the steps set out above, demonstrate its commitment or willingness to adhere to Onsite's standards of ethical behaviour and implement meaningful and long lasting change in its operations and supply chain.

5. Assessing & Managing Modern Slavery Risks

Onsite regularly undertakes the following actions to assess and mitigate the potential modern slavery risks identified above.

Recruitment Process

As part of Onsite's recruitment procedures, Onsite only uses reputable recruitment firms. Employees or potential employees do not pay the recruitment firms.

Training provided to employees

We provide work related and industry related training to our employees.

Mandatory training is offered to all of our work force, with specific training to focussing on the additional human resource risks and training for our staff employed on Working Visa. The general trainings are conducted via a series of tailored training modules on the employee portal SharePoint and on site. The training modules are

updated annually to expand awareness and learnings across the business. Additional steps and follow-up actions are in place to maximise completion rates.

Suppliers Due Diligence

In 2022, Onsite has rolled out the supply chain due diligence. Onsite has compiled a Supplier database and created a user-friendly modern slavery questionnaire to be completed by all the suppliers. This questionnaire is also updated annually to ensure it is up to date with current modern slavery standards and expectations.

The returned information is being reviewed, followed up where required, and will be compiled into a Modern Slavery Risk Register.

New Suppliers Onboarding

Onsite's supplier onboarding process currently requires the completion of the Modern Slavery questionnaire to gauge the Supplier's adherence with the requirements.

Contractual Protections

Onsite has reviewed and updated its supplier contracts. Onsite's updated supplier contract terms include the assessment and identification of modern slavery risks, and warranties that suppliers comply with all modern slavery laws and report any concerns to Onsite. The suppliers' compliance with the Onsite's Ethical Business Policy being a KPI or contractual clause.

Onsite continues to establish processes and procedures necessary to ensure the suppliers and customers we engage with are:

- assessing and addressing risks regarding forced labour and slavery, including implementing appropriate due diligence and remediation programs;
- notifying Onsite as soon as possible of any instances of forced labour or slavery are detected and the actions undertaken to remedy the issue;
- upon request, providing evidence to Onsite to demonstrate compliance.

6. Measuring the effectiveness

In FY 2022, the principal focus has been on improving learning and familiarity with the Modern Slavery framework and better understand of Onsite's supply chain through mapping and investigative procedures. This has been integral in identifying how the risks of modern slavery may appear and present in our operations and supply chains.

The ways in which Onsite has measured the effectiveness of its measures at this early stage is to:

- monitor the number and range of employees who have completed their prescribed/mandatory Modern Slavery learning and training modules and to ensure responses to the post-module quizzes reach the minimum threshold to qualify for completion of the module.
- monitor the number and range of suppliers who have completed the Modern Slavery questionnaire, and to maximise greater rates of completion through better engagement and follow-ups with our Suppliers;
- monitoring frequency and trends of whistleblowing channels (STOPLine).

Onsite acknowledges that its frameworks and processes are in the intermediate stages of implementation and rollout, and the same affects its ability to meaningfully measure their effectiveness in identifying and addressing the risks of modern slavery practices in our operations and supply chain.

7. Consultations and Continuous Journey

During this reporting period the emphasis has been on investigating the high-risk areas identified in the annual risk assessment. We understand the long-term approach to continuously improve the fight against modern slavery. The areas for development in the next 3 years are:

Risk & Compliance:

Development of the Modern Slavery Risk Register with further information provided by suppliers and customers. Expanding the register will assist the team to effectively evaluate and identify the high and medium risk areas as identified in this Statement. The focus going forwards will look at the steps the business can take to delve deeper into the higher risk categories and activities to ensure that greater due diligence is undertaken in those areas.

Workforce Training:

Workforce training to increase awareness of all elements of modern slavery and training on the reporting process to encourage reporting and investigation.

It is anticipated that training is rolled out in a manner that reflects the varied environments in which Onsite conducts its business, from corporate offices through to remote branches, or satellite branches on customer premises. The aim for Onsite is to tailor the training so that it is appropriate to the risks as they are likely to present in each environment such that the training is current, relevant and also capable of being understood and absorbed, increasing the chances of effective risk identification and reporting.

Expanding application the commercial teams when tendering for or engaging new suppliers or contractors, allocating team members to certain business regions to ensure a standardised system for evaluating that external parties adherence and commitment to upholding ethical business practices, free from modern slavery in any form.

Review of human resources processes for sourcing employees from overseas and the onboarding process, together with evaluation to the effectiveness of mechanisms available to ensure that employees have not been, and are not subject to coercion, duress or exploitation at any stage during the recruitment process.

Administrative Framework:

Implementation of a standardised Services Agreement which is revised annually pursuant to which new suppliers or contractors are engaged. This Agreement includes a positive obligation requiring the suppliers or contractors to comply with the overarching intent and policies under the Modern Slavery legislation.

With substantive Services Agreements where performances measures are appropriate, ensure that compliance with Modern Slavery legislation is included as a Key Performance Indicator.

From a business perspective, develop Key Performance Indicators that are specific and measurable by which the effectiveness of the steps taken by Onsite can be assessed. These performance indicators would be used to identify the progress made in areas such as human resources 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.

Policy Development:

Reviewing and updating the Ethical Business Policy annually and ensuring stakeholder compliance by ensuring the updates and developments in the Ethical Business Policy form the basis of ongoing training to the business.

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 2022, and is approved by the Board of Onsite Rental Group Ltd.

A handwritten signature in black ink, appearing to read "Cliff Lawrenson".

.....
Cliff Lawrenson
Chair

Dated: 21 / 12 / 2022