



# MODERN SLAVERY STATEMENT

Kennards Hire Pty Ltd – ABN 69 001 740 727

Reporting period  
1 July 2020 - 30 June 2021





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For more information regarding the Kennards Hire Modern Slavery Statement and for related questions or clarifications, please contact the Kennards Hire Company Secretary on 02 8824 2207.



## OUR VALUES

**FAIR DINKUM**



**TAKING HIRE HIGHER**



**ONE FAMILY**



**EVERY CUSTOMER  
A RAVING FAN**



## MESSAGE FROM THE CEO

Kennards Hire's mission is to be the 'Best Hire Company in the World'. Our mission statement is not just words on a page, it encapsulates how deeply we care about our people, customers, suppliers and the communities in which we all live, work and play. This care is extended more broadly to a global view in which we consider how our decisions, underpinned by our four core values of 'Fair Dinkum', 'Taking Hire Higher', 'One Family' and 'Every Customer a Raving Fan', impact the lives of others.

As a business, we work across multiple customer segments in diverse industries and acknowledge that modern slavery continues to be a serious violation of human rights across the world. Furthermore, as a family-owned business, we believe it is important we remain attentive to global concerns and take action to eliminate human rights violations throughout our supply chain.

Kennards Hire has not been immune to the continuing challenges presented by the COVID-19 pandemic which has disrupted supply chains globally over the past 18 months. However, we remained vigilant in prioritising the identification, management and mitigation of the risks of modern slavery within the restraints imposed by the pandemic.

Our second Modern Slavery Statement outlines the work Kennards Hire has continued with to understand and address the risks associated with modern slavery across our business activities and supply chains.

A handwritten signature in black ink, appearing to read 'Bill Whitehouse'.

**Bill Whitehouse**  
Chief Executive Officer

9 November 2021

## INTRODUCTION

Throughout the FY21 reporting period, the COVID-19 pandemic meant that we were again challenged by periods of uncertainty and the need to adjust quickly to prioritise the safety of our team members and our customers. Whilst some activities associated with our commitment to eliminating modern slavery are incomplete, we have remained steadfast in our efforts to deliver meaningful change, recognising that the pandemic has not only increased the vulnerability of some workers but also has the potential to distract from the delivery of effective impact.

Kennards Hire is committed to contributing to a commercial environment where abuse and exploitation is eradicated, particularly in global supply chains which often represent disproportionately affected workers. Our commitment is evidenced by action in our engagement of human rights specialists who have contributed proprietary technology, allowing risk assessments to move well beyond direct supplier relationships to develop an understanding of where risks lie much further in our extremely diverse supply chains.

Our second statement, compiled in accordance with the requirements of the Modern Slavery Act 2018 (Cth) is demonstrative of our continuous improvement commitment and the development of the Kennards Hire response over time. Several crucial initiatives have either been completed or are underway including training, enhanced due diligence and the establishment of key policies, all of which strengthen the foundation for effective action. There are also planned due diligence measures that we intended to address in FY21 that are incomplete and we have been transparent in identifying those items in this statement. Kennards Hire has again made strategic forward commitments towards identifying and addressing modern slavery with a focus on establishing formal evaluation standards to measure and track progress and respond to risks wherever they may arise.



## IDENTIFY THE REPORTING ENTITY

This Modern Slavery Statement relates to the supply chains and operations of Kennards Hire Pty Ltd ABN 69 001 740 727 (“Kennards”) and its controlled entities in relation to identifying, managing and mitigating the risk of modern slavery in our operations and supply chains. Information from our inaugural Statement has been reiterated in sections where details have not changed across the reporting periods.

For the purposes of reporting activities under the Act, Kennards Hire Pty Ltd is the predominant entity that was actively engaged in supplier relationships and contracts during the subject reporting period. The other active entity controlled by Kennards Hire is Kennards Hire New Zealand Limited (NZBN 9429030535473). The same executive team is responsible for management across companies and consistent management practices and standards are employed by the entities, including in relation to modern slavery issues. This Statement has been prepared in consultation with the Kennards Hire Board of Directors and has been signed by a duly authorised corporate officer in accordance with the requirements of the Modern Slavery Act 2018 (Cth). The principal governing body approval document is annexed to the Statement in Annexure 1.

### Our Structure Operations & Supply Chains

Kennards provides equipment rental products and solutions across various markets and industries, including do-it-yourself home renovators, small trades, through to the most complex services and equipment required for large scale construction and infrastructure projects.

Kennards also supplies equipment and other support to niche markets, such as pumping and power generation, traffic control, lifting and shifting, testing and measuring requirements, and major events.

We directly employ over 1,500 people across Australia and New Zealand to deliver exceptional hire equipment services across the array of markets described above. The Kennards network includes over 190 sites and branches across Australia and New Zealand, alongside several support offices. The location of each Kennards branch and support sites can be found in Appendix 1.

Kennards has continued to engage with external subject matter experts throughout the reporting period to further develop and implement a best practice response to modern slavery risks. Initial supply chain mapping that forms the basis for the modern slavery risk assessment exercise has been replicated and expanded to incorporate additional suppliers and includes comprehensive mapping of supply chains up to Tier 10, categorised by country and industry type. This supply chain mapping includes (but is not limited to) key features including the manufacturing and transportation of the products that Kennards purchases to hire and sell to its customers and services. It covers various logistical operational activities such as cleaning, logistics, towing, security, uniform, waste removal, equipment, maintenance, and subcontractors services.

Interaction with direct suppliers changed minimally across the FY20 to FY21 reporting periods. Total supplier count decreased by 2% and supplier spend increased by 2%. Over 99% of direct suppliers continue to be based onshore in Australia and New Zealand.



**1500+**  
PEOPLE



**190+**  
SITES & BRANCHES

## RISKS OF MODERN SLAVERY IN OUR SUPPLY CHAINS & OPERATIONS

As with the first reporting period, we are not aware of any actual known or suspected incidences of modern slavery in our supply chains or operations. Once again, in accordance with the requirements of the Act, we have sought to identify and assess potential risks of modern slavery, including those potential risks that may lie well beyond the suppliers that we are in a direct contractual relationship with. There have not been any material changes to our direct suppliers during this reporting period compared to the last period. As a result, we consider that the initial risk assessment that we performed during the first reporting period, which mapped our supply chains up to Tier 10, remains valid and continues to inform our focus for ongoing due diligence and supplier engagement. The risk assessment identified the following areas of potential elevated modern slavery risk:

- Australian wholesale trade and Australian road freight;
- Intermittent sourcing of migrant workers from overseas to address labour shortages in specific skill and qualification profiles (Kennards did not engage any migrant workers throughout the reporting period but is likely to continue with this practice in the future);
- The traceability of key component inputs for the production of lithium ion battery products; and
- Supply chain links in relation to products that are produced, manufactured or otherwise connected with high risk geographies.

We acknowledge that elevated modern slavery risks can arise through a complex interaction of factors, including:

- Total supplier spend amounts (i.e., the value of our direct supplier contracts);
- Industry category, including industries that, in turn, feed into particular categories down the supply chain pipeline;
- Geographical area of operation; and
- Depth or 'tiering' within the supply chain(s) e.g. 3rd tier supplier, 5th tier supplier, etc.

Using external consultant support and technology to input these key influencing factors together with our top suppliers by spend, we have evaluated a significant majority of the risk aspects present in the Kennards supply chain. This has allowed us to identify the areas posing the highest relative modern slavery risks for focus, ongoing due diligence and remediation. This multi-faceted approach takes into consideration supply chain data from 190 countries and 15,909 industry sectors. The assessment ultimately provides risk estimate visibility by supplier, supply chain tier, industry and country. Further detail on the initial risk assessment methodology is available in Appendix 2 (page 18).

In the FY21 reporting period, the initial and expanded risk assessment findings were utilised to perform a deep dive analysis of select product and service categories that represent dominant input materials for Kennards hired equipment and a potential elevated modern slavery risk. The ensuing report identifies the focus areas for ongoing due diligence by examining areas where elevated modern slavery risk are present in relation to the product or service category.

The methodology for product based risk analysis necessarily entails the initial risk assessment to elicit whether the specific risk profile of a specific product is materially different from other products within that industry category level. The next stage is an examination for modern slavery which is by nature difficult to surface amongst the complexities of global commerce and the general lack of transparency beyond the relationship that end-user product companies such as have with their direct suppliers. Finally, beyond the initial assessment, the transition from 'macro level' modern slavery risk analysis to 'micro level' examinations of specific products and/or services is considered.

Overwhelmingly for the vast majority of inputs, the complex web of component part and material inputs from deep in the supply chain and significantly removed from primary operations of direct suppliers represent the most likely area of elevated modern slavery risks. Equally at this level of the supply chain it is not possible to conclude whether there are or are not actual incidences of modern slavery. Nevertheless, it provides an effective platform for ongoing efforts by identifying priority areas to be targeted for maximum low tier visibility. In particular the traceability of key component inputs at the raw material extraction stage that have been flagged as high risk. This targeted approach is designed to be complimentary to the more general modern slavery response discussed later in the statement.

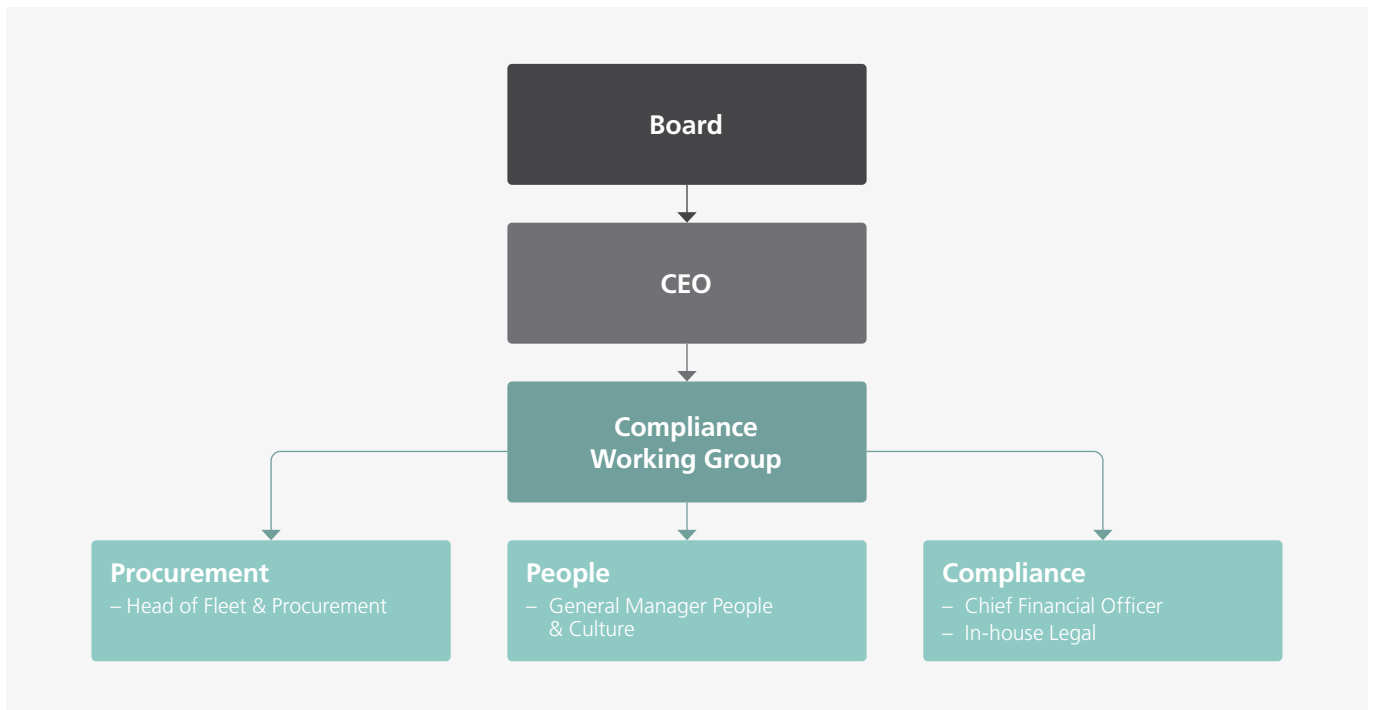
Moving forward with this targeted approach, initial action steps are likely to involve qualifying activities such as eliminating and excluding less relevant component parts or services or those not actually contained within supplier products. After this initial step, further geographical source mapping and subsequent analysis is completed. Once this information is known, less assumption based inferences may be drawn.

In the reporting period, Kennards has also invested time in identifying high risk Tier 1 suppliers by overall spend and theoretical slavery footprint per million dollars spent for the purposes of further due diligence. The exercise was complemented by the distribution of self assessment questionnaires from which responses will be used to reweight supplier risk profiles in the FY22 reporting period. The objective of the self assessment questionnaires is to provide visibility over areas such as supplier policies, training, response process and Kennards suppliers' engagement with their own suppliers.

## ACTIONS TO ADDRESS MODERN SLAVERY RISKS INCLUDING DUE DILIGENCE & REMEDIATION PROCESSES

### Compliance Working Group

The Kennards Compliance Working Group, established to periodically review general risk and compliance, has matured over the past year with the focus becoming more modern slavery centric. The development of a purpose statement has assisted with aligning members and the business on the group’s objectives. The group has continued to meet monthly although the standing attendees have been adjusted to reflect the ongoing need to for cross-functional contributions. The Working Group is equipped to respond to modern slavery risks identified in general business through formal grievance mechanisms or through purpose specific due diligence activities.



### Procurement Contracts

At Kennards, we pride ourselves on our partnerships with suppliers, particularly those from whom we purchase the high quality equipment we hire to our customers. This is reflected in the longstanding relationships that have been developed over time.

For suppliers that are not reporting entities themselves, supplier contracts play an important role in aligning businesses on modern slavery obligations which is being progressively managed at the account engagement level. Consistent with best practice contract provisions dealing with modern slavery, entities providing the contractual warranties must implement reasonable measures to address modern slavery including identifying, assessing and mitigating the risk of modern slavery in relation to their own suppliers. The provision has been included in the Kennards standard supply agreement which is distributed to any potential new supplier as the preferred method of engagement. Of the small minority of existing suppliers subject to the standard supply agreement, most have agreed to an addendum to incorporate the provisions and remaining suppliers will either be transitioned to the standard supply agreement or have modern slavery compliance provisions included in alternative terms of agreement.

### Training

During the reporting period, we worked with our modern slavery specialists to procure and deliver an initial modern slavery awareness e-learning module to relevant team members. The module content provides a general introduction to modern slavery and outlines the relevant legislative requirements that apply to the business. The specialist training was not delivered to all managers as was envisaged and referenced in the previous statement and was instead delivered to the Kennards Procurement and People & Culture teams.

The first training module will be supplemented in the FY22 reporting period by a follow up module targeted towards specifically examining the risk profile of Kennards operations and procurement activities to further build participant capability. Utilising purpose developed case studies, the content will focus on identifying modern slavery risks in practice thereby providing indicators to perform screening both when evaluating and on-boarding a new supplier. Best practice recruitment processes, particularly when dealing with vulnerable work forces, will also be covered in the context of the roles required within Kennards operations and support functions.

## Policy Support

The Kennards Whistleblower Policy continues to address risk remediation by providing internal parties with a clear directive that wrongdoing in any form, including actual or suspected modern slavery practices, within or external to the organisation, by contractors or suppliers should be reported. The policy encourages legitimate reporting of wrongdoing by establishing a convenient and safe mechanism for doing so and by providing protection for people who make wrongdoing disclosures.

Through consultation with our external modern slavery specialists and internal stakeholders, a best practice Modern Slavery Policy has been developed. The policy describes how Kennards modern slavery approach is reflected through the internal governance framework including in operational policies and procedures. The policy outlines the consequences of non-conformance and Kennards commitment to addressing modern slavery across training, engagement, due diligence, compliance and risk remediation. In addition to the policy, Kennards ensures that all its equipment is procured in accordance with the following policies that also address modern slavery issues:

- Procurement Policy; and
- Human Rights and Ethical Conduct Policy.

## Worker Voice

Connected and amplified through our policies is the concept of worker voice. We look after our people and they are at the core of everything we do at Kennards and this includes prioritising their rights and wellbeing first and foremost. Alongside the readily available grievance mechanism, we further empower our team members by actively promoting that their voice is heard through an array of initiatives including employee surveys, annual performance programs, feedback and problem reporting portals, safety and general improvement programs.

## Migrant Workers

As has been stated, our recruitment activities were confined to Australia and New Zealand during the FY21 reporting period. Nevertheless, migrant recruitment risk mitigation processes remain robust and have been restated below.

In relation to migrant workers, Kennards only contracts with accredited recruiting agencies that have been subjected to extensive due diligence and ongoing compliance review.

In order to address skills shortages and support the maintenance of Kennards rental equipment both in branch locations and on customer sites a small number of positions are occasionally recruited from overseas under the 482 VISA program.

Where Kennards have participated in direct overseas recruitment activities, we only utilise recruitment agencies that are accredited by the recognised overseas government agencies dealing with the protection of the worker's rights and the promotion of full employment, equality of employment opportunities and securing best possible terms and conditions. The entity engaged adheres to the highest standards of ethical recruitment policies and practices and does not charge applicants placement fees or other costs.

To mitigate the risk of modern slavery, prior to engaging with any third-party recruiter, a trained specialist from Kennards visits the site to undertake in-person auditing and to ensure that workers' rights are being protected during the recruitment process. Upon arriving in Australia or New Zealand, workers recruited internationally are provided with appropriate remuneration and employee benefits, including accommodation assistance and business mentors.

## Supplier Self Assessment Questionnaire

As referenced under the risks section (page 6), we have sent requests to select suppliers to complete self assessment surveys. Surveys were selectively sent to suppliers on the basis of supplier spend and theoretical slavery footprint per million dollar spent on the supplier. The self assessment responses will be used to re-evaluate the supplier risk profile to ensure ongoing remediation and risk mitigation efforts are targeted. Unfortunately at this stage, despite surveys being available to complete for several months, response rates have been underwhelming. We are currently investigating alternative methods to increase engagement and lift the response rate. Risk re-evaluations will not be completed until a satisfactory number of completions have been met.

## Deep Dive Audit

The deep dive audit recommendations outlined earlier in the risks section (page 6) will be utilised to inform the Kennards modern slavery roadmap. The complex nature of the recommendations are such that they will need to be progressively targeted over an extended period of time.



## MEASURING EFFECTIVENESS

Kennards has made the forward commitments outlined in this section and will work towards their strategic operationalisation together with resetting long-term objectives as part of a three-year roadmap. Integrating initiatives within the business will be supported by a plan that identifies key milestones and how they will be reached. We have also recognised the importance of a formalised framework of monitoring and evaluation to apply a consistent standard of impact assessment across these activities, which we finalised prior to the lodgement of this statement to be used for subsequent reporting periods.

### Supplier Code of Conduct

Kennards have developed a Supplier Code of Conduct that reflects the business values and standards, inclusive of the clear requirement for suppliers to comply with international and domestic regulations pertaining to modern slavery. At this stage, the code has not yet been published whilst we work on establishing an appropriate mechanism to manage supplier adherence. The code is not designed to be aspirational therefore it is important that there is a measure by which supplier compliance can be assessed. Kennards are continuing to develop a rollout plan to formally communicate and socialise the expectations set out in the code of conduct with our suppliers. We expect that the code of conduct will be published by the end of the FY22 reporting period and has been included in Appendix 3 for reference.

### Supplier Screening

#### Multiple Tier Risk Assessment Activity

Kennards increased the coverage of suppliers included in the risk assessment exercise from 80 to 86% of total supplier spend from the first to the second reporting periods. The increase in spend represents a 70% increase in the number of suppliers included in the assessment. Kennards intends to cast the net increasingly wider, expanding the assessment proportion in subsequent reporting periods, ultimately targeting full coverage. Approaching the assessments by moving down the supplier list in order of spend is based on the simple reasoning that we expect to be able to exert greater influence on the behaviour of suppliers with whom we invest more and, in most cases, deal with more frequently.

#### Supplier Risk Profiling and Due Diligence

Where heightened risks are identified self assessment surveys are distributed to suppliers.

### Long Term Roadmap

To continue to ensure that proactive planning is the formative principle guiding Kennards developing response to addressing modern slavery, we are exploring the prospect of developing an extended modern slavery response roadmap in consultation with our human rights specialists. As response initiatives grow and mature, so does the importance of a strategic approach. The strategic planning will likely be mapped over a three-year period focusing on business wide integration of initiatives and the progressive improvement of outcomes. The roadmap will be built around key assessment pillars – each of these made up of actionable items to ensure that modern slavery risks are assessed, addressed and mitigated under that pillar.

### Monitoring and Response Framework

Whilst Kennards have completed a number of effectiveness measures, there are important steps to take to improve cohesiveness and coverage. Prior to the lodgement of this statement, Kennards engaged with external subject matter experts to produce an overarching monitoring and response framework as outlined below. The framework includes key performance indicators to support long-term reporting on impact and outcomes. As the framework matures, it would be desirable to include benchmarking and further in-depth tracking and analysis of due diligence actions.

| Action Area  | Key Performance Indicators  |
|--|---|
| <b>GOVERNANCE</b>  |   |
| 1.0 Functional Operation of compliance Group               | 1.1 Frequency of Working Group convening<br>1.2 Composition of Group – appropriate top-level, executive representation<br>1.3 Initiatives actually implemented / improved as a result of the Group's leadership |
| 2.0 Modern Slavery related internal education and training | 2.1 Online training modules provided to all staff<br>2.2 Specific training provided to key teams, such as procurement<br>2.3 Modern Slavery Workshop delivered to Board of Directors                            |
| 3.0 Internal governance and policy frameworks              | 3.1 Development and roll out of Supplier Code of Conduct, modern slavery provisions in supplier contracts, modern slavery policy, grievance handling policy   |

| Action Area  | Key Performance Indicators   |
|--|--|
| <b>DUE DILIGENCE</b>   |  |
| 1.0 Supplier engagement  | 1.1 Issuing of supplier self assessment questionnaires and internal review of responses – specifying % of suppliers (total or belonging to particular industry category/ies or product group(s))<br>1.2 Increasing number of specific suppliers (direct and indirect) that are assessed and subject to specific due diligence and / or audit<br>1.3 Increasing the number of specific suppliers (direct and indirect) that are assessed, at an individual level, for modern slavery risk |
| 2.0 Risk assessment of direct suppliers                              | 2.1 Complete coverage (100%) of all procurement spending   |
| 3.0 Increasing industry group collaboration on modern slavery issues | 3.1 Participation in relevant industry working group   |
| 4.0 Desktop auditing of specific suppliers/product categories        | 4.1 Specified percentage of total identified high(er) risk suppliers and/or product categories that are subjected to desktop auditing activities   |
| <b>REMEDATION</b>  |  |
| 1.0 Grievance procedures and whistleblower facilities                | 1.1 Implementation and availability in ‘high visibility’ areas<br>1.2 Regular analysis of level of uptake and use (or non-use) – consideration of whether this is due to genuine absence of issues or need to review the accessibility of measures to areas where most required<br>1.3 Coordination with direct suppliers and beyond to ensure continuity of remediation measures as deep as possible into relevant supply chains  |

## **IMPACT OF COVID**

Across both 2020 and 2021, Kennards implemented stringent COVID-19 procedures for employees, customers and suppliers in Australia and New Zealand. Managed through the COVID-19 Response Team, these activities included investment in PPE and sanitation supplies, additional cleaning of high-touch surfaces and equipment points, increased hygiene measures, regular communication with affected parties and the request that non-essential activities such as supplier visits and sales calls be postponed. All personnel were advised to follow the government regulations implemented at a local level.

Team members who had the ability to work from home were provided full assistance to do so, whilst customer-facing staff were provided additional support, resources and tools to assist in working within a pandemic situation.

Additionally, Kennards was the first equipment hire company to introduce contactless, click & collect services to provide a safe, effortless customer experience.

Despite the disruption and associated challenges, we have remained committed to developing efforts towards identifying, managing and mitigating the risks of modern slavery wherever possible within the constraints created by the ongoing pandemic.

## **CONSULTATION WITH OTHER ENTITIES**

This Modern Slavery Statement is submitted on behalf of all entities trading under Kennards Hire Pty Ltd and is inclusive of the operations, supply chains and relevant actions across both Kennards Hire Australia and New Zealand. To a large extent, business activities are centralised and, at the executive level, the same management team is responsible across both entities. People, processes and initiatives are shared by the businesses, therefore consultation constantly occurs as part of standard business operations.

## APPENDIX 1 – KENNARDS HIRE BRANCH & SITE LOCATIONS

### AUSTRALIA

#### NSW

|  |   |
|--|---|
| Group Support Office                       | Unit 1, Building I, 22 Powers Road, SEVEN HILLS NSW 2147          |
| Kennards Hire Museum                       | 16 Herbert Street, ARTARMON NSW 2064                              |
| Access, Earthmoving & Site Services Sydney | 2167 Castlereagh Road, PENRITH NSW 2750                           |
| Alexandria                                 | 200 Botany Road, ALEXANDRIA NSW 2015                              |
| Artarmon                                   | 16 Herbert Street, ARTARMON NSW 2064                              |
| Bankstown                                  | 39 Canterbury Road, Corner Stacey Street, PUNCHBOWL NSW 2196      |
| Bathurst                                   | 14 Littlebourne Street, KELSO NSW 2795                            |
| Bexley                                     | 560 Forest Road, BEXLEY NSW 2207                                  |
| Brookvale                                  | 196A Harbord Road, BROOKVALE NSW 2100                             |
| Burwood                                    | 1-7 Lucas Road, BURWOOD NSW 2134                                  |
| Byron Bay                                  | 4 Centennial Court, BYRON BAY NSW 2481                            |
| Campbelltown                               | 189 Airds Road, CAMPBELLTOWN NSW 2560                             |
| Coffs Harbour                              | 34 Marcia Street, COFFS HARBOUR NSW 2450                          |
| Concrete Care Artarmon                     | Unit 2, 16 Herbert Street, ARTARMON NSW 2064                      |
| Concrete Care Moorebank                    | 115 Newbridge Road, MOOREBANK NSW 2170                            |
| Corrimal                                   | 277 Princes Highway, CORRIMAL NSW 2518                            |
| Dubbo                                      | Lot 81 Wheelers Lane, DUBBO NSW 2830                              |
| Girraween                                  | Corner Toongabbie Road & Great Western Highway, GIRRAWEE NSW 2145 |
| Gosford                                    | 285 Manns Road, Corner Merinee Road WEST GOSFORD NSW 2250         |
| Goulburn                                   | 34-36 Clinton Street, GOULBURN NSW 2580                           |
| Griffith                                   | 20-24 Jondaryan Avenue, GRIFFITH NSW 2680                         |
| Heatherbrae                                | 299 Pacific Highway, HEATHERBRAE NSW 2324                         |
| Hornsby                                    | 69 Pacific Highway, HORNSBY NSW 2077                              |
| Hoxton Park                                | Unit 1, 358 Hoxton Park Road, HOXTON PARK NSW 2171                |
| Kellyville                                 | 35 Windsor Road, KELLYVILLE NSW 2155                              |
| Lambton                                    | 48 Griffiths Road, LAMBTON NSW 2299                               |
| Lift & Shift Alexandria                    | 5/53 Burrows Road, ALEXANDRIA NSW 2015                            |
| Lift & Shift Silverwater                   | 22 Fariola Street, SILVERWATER NSW 2128                           |
| Lismore                                    | 10 Lancaster Drive, GOONELLABAH NSW 2480                          |
| Mittagong                                  | 94 Bowral Road, MITTAGONG NSW 2575                                |
| Mona Vale                                  | 61 Barrenjoey Road, MONA VALE NSW 2103                            |
| Moorebank                                  | 115 Newbridge Road, MOOREBANK NSW 2170                            |
| Nowra                                      | 236 Princes Highway, SOUTH NOWRA NSW 2541                         |
| Oak Flats                                  | 125 Industrial Road, OAK FLATS NSW 2529                           |
| Orange                                     | 201 Byng Street, ORANGE NSW 2800                                  |
| Parkes                                     | 7-9 Federal Street, PARKES NSW 2870                               |
| Penrith                                    | Corner Castlereagh Road & Lugard Street, PENRITH NSW 2750         |
| Port Macquarie                             | 30 Jindalee Road, PORT MACQUARIE NSW 2444                         |
| Pump & Power Singleton                     | 2 Rosedale Close, MCDOUGALLS HILL NSW 2330                        |

|                     |   |
|---------------------|---|
| Pump & Power Sydney | 2167 Castlereagh Road, PENRITH NSW 2750                       |
| Rail Rutherford     | 110 Kyle Street, RUTHERFORD NSW 2320                          |
| Rozelle             | 69 Victoria Road, Corner Hartley Street, ROZELLE NSW 2039     |
| Rutherford          | Corner Mirage Road & New England Highway, RUTHERFORD NSW 2320 |
| Rydalmere           | 269 Victoria Road, Corner Clyde Street, RYDALMERE NSW 2116    |
| Seven Hills         | Corner Old Windsor Road & Powers Road, SEVEN HILLS NSW 2147   |
| Smeaton Grange      | 1/49 Smeaton Grange Road, SMEATON GRANGE NSW 2567             |
| St Marys            | 102 Forrester Road, MARYS NSW 2760                            |
| Tamworth            | Corner Lockheed Street & Plain Street, TAMINDA NSW 2340       |
| Taree               | 19-21 Crescent Avenue, TAREE NSW 2430                         |
| Taren Point         | Unit 2, 139 Taren Point Road, TAREN POINT NSW 2229            |
| Traffic Sydney      | 2167 Castlereagh Road, PENRITH NSW 2750                       |
| Unanderra           | 85 Princess Highway, UNANDERRA NSW 2526                       |
| Wagga Wagga         | 30 Edward Street, WAGGA WAGGA NSW 2650                        |
| Warners Bay         | 20 Medcalf Street, WARNERS BAY NSW 2282                       |
| Waverley            | 340 Bronte Road, Corner High Street, WAVERLEY NSW 2024        |
| Wetherill Park      | 1/3 Nello Place, WETHERILL PARK NSW 2164                      |
| Windsor             | 12B Wingate Road, WINDSOR NSW 2756                            |
| Woollahra           | 64-66 Oxford Street, WOOLLAHRA NSW 2025                       |

**ACT**

|            |  |
|------------|--|
| Belconnen  | 75 Oatley Court, BELCONNEN ACT 2616    |
| Fyshwick   | 1 Townsville Street, FYSHWICK ACT 2609 |
| Mitchell   | 117 Flemington Road, MITCHELL ACT 2911 |
| Phillip    | 13 Colbee Court, PHILLIP ACT 2606      |
| Queanbeyan | 81 Yass Road, QUEANBEYAN ACT 2620      |

**QLD**

|                                 |   |
|---------------------------------|---|
| Access & Site Services Brisbane | 38 Magnesium Drive, CRESTMEAD QLD 4132                            |
| Beenleigh                       | Corner Logan River Road & Harburg Drive, BEENLEIGH QLD 4207       |
| Bowen Hills                     | Corner Abbotsford Road & Edmondstone Street, BOWEN HILLS QLD 4006 |
| Brendale                        | 133 Southpine Road, BRENDAL QLD 4500                              |
| Browns Plains                   | Corner Johnson Road & Southlinks Street, BROWNS PLAINS QLD 4118   |
| Bundamba                        | Corner Boyce Street & Brisbane Road, BUNDAMBA QLD 4304            |
| Burleigh West                   | Corner Reedy Creek Road & Taree Street, BURLEIGH WEST QLD 4220    |
| Cairns                          | 125 Hartley Street, PORTSMITH QLD 4870                            |
| Caloundra                       | 27 Bronwyn Street, CALOUNDRA WEST QLD 4551                        |
| Cleveland                       | 16 Wellington Street, CLEVELAND QLD 4163                          |
| Concrete Care Rocklea           | 60 Balham Road, ROCKLEA QLD 4106                                  |
| East Brisbane                   | 39 Caswell Street, EAST BRISBANE QLD 4169                         |
| Indooroopilly                   | 10 Rennies Road, INDOOROOPILLY QLD 4068                           |
| Labrador                        | 316 Brisbane Road, LABRADOR QLD 4215                              |
| Lift & Shift Rocklea            | 59 Balham Road, ROCKLEA QLD 4106                                  |
| Mackay                          | 22 Hamilton Street, NORTH MACKAY QLD 4740                         |

|                       |   |
|-----------------------|---|
| Maroochydore          | 23 Page Street, KUNDA PARK QLD 4556                           |
| Morayfield            | 2 Oakey Flat Road, MORAYFIELD QLD 4506                        |
| Nerang                | 16 Spencer Road, NERANG QLD 4211                              |
| Noosaville            | 13 Leo Alley Road, NOOSAVILLE QLD 4566                        |
| Oxenford              | 159 Old Pacific Highway, OXENFORD QLD 4210                    |
| Port Douglas          | Lot 1 Captain Cook Highway, PORT DOUGLAS QLD 4877             |
| Pump & Power Brisbane | 35 Magnesium Drive, CRESTMEAD QLD 4132                        |
| Rail Brisbane         | 36 Magnesium Drive, CRESTMEAD QLD 4132                        |
| Redcliffe             | 77 Snook Street, REDCLIFFE QLD 4020                           |
| Rocklea               | Corner Granard Road & Balham Road, ROCKLEA QLD 4106           |
| Springwood            | 3327 Logan Road, SLACKS CREEK QLD 4127                        |
| Toowoomba             | 186a Anzac Avenue, HARRISTOWN QLD 4350                        |
| Townsville            | 21 Hartley Street, GARBUTT QLD 4814                           |
| Traffic Brisbane      | 37 Magnesium Drive, CRESTMEAD QLD 4132                        |
| Tweed Heads           | 1/20 Machinery Road, TWEED HEADS SOUTH NSW 2486               |
| Virginia              | Corner Toombul Road & Street Vincents Road, VIRGINIA QLD 4014 |

**VIC**

|                             |   |
|-----------------------------|---|
| Abbotsford                  | 353-361 Johnston Street, ABBOTSFORD VIC 3067                |
| Access Melbourne            | Rear 2/5 Gladstone Road, DANDENONG VIC 3175                 |
| Airport West                | 29-33 Parer Road, AIRPORT WEST VIC 3042                     |
| Bayswater                   | 800 Mountain Highway, BAYSWATER VIC 3153                    |
| Brooklyn                    | 758 Princes Highway, LAVERTON NORTH VIC 3026                |
| Clayton                     | 2183 Princes Highway, CLAYTON VIC 3168                      |
| Concrete Care Dandenong     | 1 Plunkett Road, DANDENONG VIC 3175                         |
| Concrete Care Richmond      | 107 Murphy Street, RICHMOND VIC 3121                        |
| Dandenong                   | Corner Princes Highway & Plunkett Road, DANDENONG VIC 3175  |
| Doncaster                   | 2 Rose Street, DONCASTER VIC 3108                           |
| Frankston                   | 88 Dandenong Road, FRANKSTON VIC 3199                       |
| Geelong                     | 12 Maxwell Avenue, BELMONT VIC 3216                         |
| Lift & Shift Dandenong      | 1 Plunkett Road, DANDENONG VIC 3175                         |
| Lift & Shift Port Melbourne | 323 Williamstown Road, PORT MELBOURNE VIC 3207              |
| Lilydale                    | 49 John Street, LILYDALE VIC 3140                           |
| Moorabbin                   | 919 Nepean Highway, Corner North Avenue, MOORABBIN VIC 3204 |
| Mornington Branch           | 988 Nepean Highway, MORNINGTON VIC 3931                     |
| Narre Warren                | 1 Narre Warren-Cranbourne Road, NARRE WARREN VIC 3805       |
| North Geelong               | 346 Melbourne Road, NORTH GEELONG VIC 3215                  |
| Pakenham                    | 1225 Koo Wee Rup Road, PAKENHAM VIC 3810                    |
| Preston                     | 33 Albert Street, PRESTON VIC 3072                          |
| Pump & Power Melbourne      | Rear 2/5 Gladstone Road, DANDENONG VIC 3175                 |
| Rail Melbourne              | 1/114 Fairbairn Road, SUNSHINE WEST VIC 3020                |
| Ravenhall                   | 5/2-8 Westwood Drive, RAVENHALL VIC 3023                    |
| Richmond                    | 540 Bridge Road, RICHMOND VIC 3121                          |
| Site Services Melbourne     | Rear 2/5 Gladstone Road, DANDENONG VIC 3175                 |

|                      |  |
|----------------------|--|
| South Melbourne      | 323 Williamstown Road, PORT MELBOURNE VIC 3207 |
| Thomastown           | 173 Settlement Road, THOMASTOWN VIC 3074       |
| Traffic Laverton     | 26 Fitzgerald Road, LAVERTON NORTH VIC 3026    |
| Traffic Narre Warren | Rear 2/5 Gladstone Road, DANDENONG VIC 3175    |
| Werribee             | 305 Princes Highway, WERRIBEE VIC 3030         |

**SA**

|                            |  |
|----------------------------|--|
| Adelaide                   | 145 Grote Street, ADELAIDE SA 5000                         |
| Concrete Care Torrensville | 80 Hardys Road, TORRENSVILLE SA 5031                       |
| Darlington                 | Corner Main South Road & Seacombe Road, DARLINGTON SA 5047 |
| Glandore                   | 128 Anzac Highway, GLANDORE SA 5037                        |
| Lift & Shift Hindmarsh     | 2 Richard Street, HINDMARSH SA 5007                        |
| Morphett Vale              | 136 Sherriffs Road, MORPHETT VALE SA 5162                  |
| Mount Barker               | 60 Oborn Road, MOUNT BARKER SA 5251                        |
| Port Adelaide              | 327 St Vincent Street, PORT ADELAIDE SA 5015               |
| Pump & Power Adelaide      | 59 Galway Avenue, MARLESTON SA 5033                        |
| Roxby Downs                | 6 Gosse Street, ROXBY DOWNS SA 5725                        |
| Salisbury                  | 1730 Main North Road, SALISBURY SA 5108                    |
| Site Services Adelaide     | 22 Circuit Drive, HENDON SA 5014                           |
| Traffic Hendon             | 22 Circuit Drive, HENDON SA 5014                           |
| Trinity Gardens            | 170 Portrush Road, TRINITY GARDENS SA 5068                 |
| Valley View                | 771 North East Road, VALLEY VIEW SA 5093                   |

**NT**

|               |  |
|---------------|--|
| Alice Springs | 29 Stuart Highway, ALICE SPRINGS NT 0870 |
| Katherine     | 39 Chardon Street, KATHERINE NT 0850     |
| Palmerston    | 21 Toupien Road, PALMERSTON NT 0831      |
| Winnellie     | 135 Winnellie Road, WINNELLIE NT 0820    |

**WA**

|   |   |
|---|---|
| Access, Earthmoving & Site Services Perth | 404 Orrong Rd, WELSHPOOL WA 6106                                    |
| Balcatta                                  | Corner Balcatta Road & Erindale Road, BALCATTWA 6102                |
| Belmont                                   | 149 Francisco Street, BELMONT WA 6104                               |
| Broome                                    | 23 Hunter Street, BROOME WA 6725                                    |
| Cannington                                | Corner Nicholson Road & Spencer Road, LANGFORD WA 6147              |
| Concrete Care Belmont                     | 200 Campbell Street, BELMONT WA 6104                                |
| Fremantle                                 | 63 Stirling Highway, NORTH FREMANTLE WA 6159                        |
| Joondalup                                 | 3 Winton Road, JOONDALUP WA 6027                                    |
| Kalgoorlie                                | 10 Cunningham Drive, KALGOORLIE WA 6430                             |
| Karratha                                  | Lot 1523 Lambert Road, Karratha Industrial Estate, KARRATHA WA 6714 |
| Kununurra                                 | 12 Bandicoot Drive, KUNUNURRA WA 6743                               |
| Lift & Shift Belmont                      | 198 Campbell Street, BELMONT WA 6104                                |
| Malaga                                    | 1918 Beach Road, MALAGA WA 6090                                     |
| Mandurah                                  | 55 Gordon Road, MANDURAH WA 6210                                    |
| Midland                                   | 221 Great Eastern Highway, MIDLAND WA 6056                          |

|                    |  |
|--------------------|--|
| Myaree             | Corner Norma Road & Marmion Street, MYAREE WA 6154 |
| North Perth        | 370 Charles Street, NORTH PERTH WA 6006            |
| Port Hedland       | 13 Steel Loop, WEDGEFIELD WA 6721                  |
| Pump & Power Perth | 404 Orrong Road, WELSHPOOL WA 6106                 |
| Rockingham         | 77 Dixon Road, ROCKINGHAM WA 6168                  |
| Traffic Perth      | 404 Orrong Road, WELSHPOOL WA 6106                 |

## NEW ZEALAND

|                                  |  |
|----------------------------------|--|
| Group Support Office New Zealand | 131 Harris Road, EAST TAMAKI, AUCKLAND 2013                  |
| Albany                           | 16 Tawa Drive, ALBANY, AUCKLAND 0755                         |
| Auckland City                    | 388 Great North Road, AUCKLAND CITY, AUCKLAND 1148           |
| Christchurch City                | 472 Moorhouse Avenue, CHRISTCHURCH, CANTERBURY 8011          |
| Concrete Care East Tamaki        | 388 Great North Road, GREY LYNN 2013                         |
| Dunedin                          | 5 Midland Street, DUNEDIN, OTAGO 9054                        |
| East Tamaki                      | 131 Harris Road, EAST TAMAKI, AUCKLAND 2013                  |
| Hamilton                         | 709 Te Rapa Road, HAMILTON WAIKATO 3200                      |
| Henderson                        | 327 Lincoln Road, HENDERSON, AUCKLAND 0610                   |
| Invercargill                     | 5 Bond Street, WEST INVERCARGILL, SOUTHLAND 9810             |
| Lift & Shift East Tamaki         | 131 Harris Road, EAST TAMAKI, AUCKLAND 2013                  |
| Lower Hutt                       | 69 Waione Street, PETONE, LOWER HUTT, WELLINGTON 5012        |
| Manukau                          | 3 Mana Place, MANUKAU, AUCKLAND 2104                         |
| Mt Manganui                      | 48 Hewletts Road, MOUNT MANGANUI, BAY OF PLENTY 3150         |
| Onehunga                         | 375-377 Church Street, ONEHUNGA, AUCKLAND 1643               |
| Panmure                          | 4 Morrin Road, PANMURE, AUCKLAND 1545                        |
| Papakura                         | 3 Ray Small Drive, PAPAKURA, AUCKLAND 2113                   |
| Papanui                          | 154 Langdons Road, PAPANUI, CANTERBURY 8052                  |
| Pukekohe                         | 198 Manukau Road, PUKEKOHE, AUCKLAND 2120                    |
| Pump & Power Auckland            | 3 Ray Small Drive, PAPAKURA, AUCKLAND 2113                   |
| Queenstown                       | 22 Glenda Drive, Frankton Industrial, QUEENSTOWN, OTAGO 9300 |
| Silverdale                       | 2200 East Coast Bays Road, SILVERDALE, AUCKLAND 0992         |
| Tauranga                         | 52 Burrows Street, TAURANGA, BAY OF PLENTY 3140              |
| Traffic Auckland                 | 3 Ray Small Drive, PAPAKURA, AUCKLAND 2113                   |
| Wellington City                  | 149-153 Adelaide Road, NEWTOWN, WELLINGTON 6021              |
| Westgate                         | 16 Northside Drive, WHENUAPAI, AUCKLAND 0814                 |
| Wigram                           | 2 Parkhouse Road, WIGRAM, CANTERBURY 8443                    |



## APPENDIX 2 – UPDATED RISK ASSESSMENT METHODOLOGY SUMMARY

Incorporating company spend data throughout global markets, we have utilised external consultants with proprietary technology to trace the economic inputs required for products and services sourced from Tier 1 suppliers to Tier 2 suppliers, Tier 2 suppliers to Tier 3 suppliers, and so on, all the way to Tier 10 suppliers of the supply chain of our top suppliers by spend.

This supply chain mapping was performed using a balanced, global Multi-Regional Input-Output (MRIO) table which links supply chain data from 190 countries, and in relation to 15,909 industry sectors. This MRIO table is assembled using the following sources:

- The United Nations' (UN) System of National Accounts;
- UN COMTRADE databases;
- Eurostat databases;
- The Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and
- Numerous National Agencies including the Australian Bureau of Statistics.

The MRIO is then examined against the following international standards:

- The UN Guiding Principles on Business and Human Rights;
- The Global Slavery Index;
- International Labour Organisation (ILO) Global Estimates of Modern Slavery; and
- The United States' Reports on International Child Labour and Forced Labour.

A proprietary algorithm has been applied to synthesise publicly available risk data against the exclusively licensed MRIO table. The result of this process is the creation of a modern slavery risk profile to Tier 10 for each supplier.

This analysis was performed for the purposes of risk identification under Section 16(1)(c) of the Modern Slavery Act 2018 (Cth). No information confirms the actual existence of non-existence of slavery in Kennards' supply chains or operations. Initial Risk Assessment analysis was undertaken at the industry and country level. It does not account for variances at the entity, region or product level.

The multi-faceted approach to the modern slavery risk assessment that we have undertaken has included examination and analysis of the following:

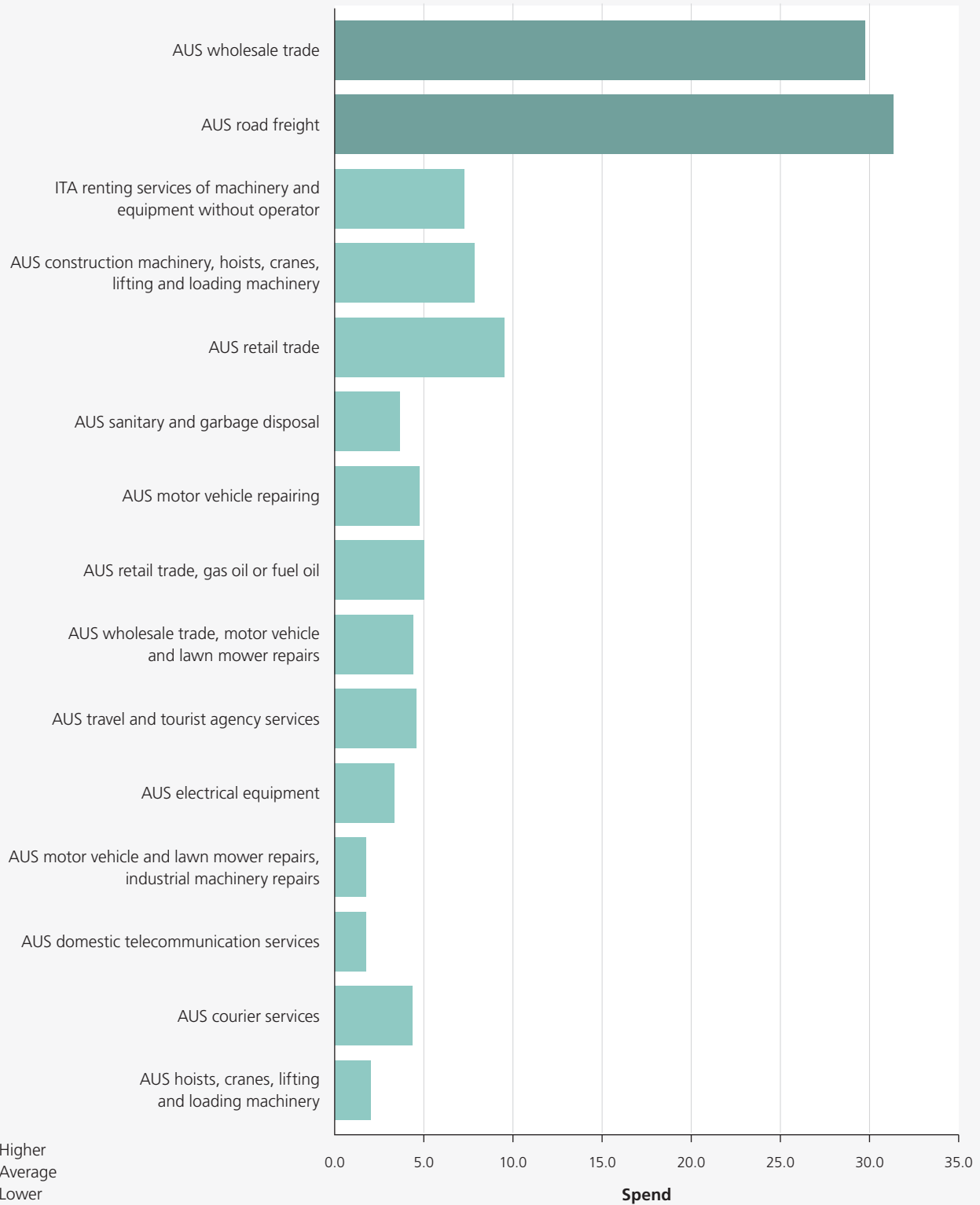
- a. The individual suppliers and industries with the most elevated risk of modern slavery.
- b. Supply chain plots to provide a visual representation of the supply chain for Kennards' top 3 first tier industries.
- c. Plotting the relative slavery risk in the supply chain by tier, up to tier 10.
- d. Geographical depiction of the cumulative risk of modern slavery across the supply chain around the world.
- e. An overview of the classification of the first tier of our supply chain by country and industry, including relative modern slavery risk.

The top 50 suppliers in our supply chains and operations that posed the highest calculated risks in relation to modern slavery were identified.

Examples of these results from our Initial Risk Assessment is provided in the figures below.

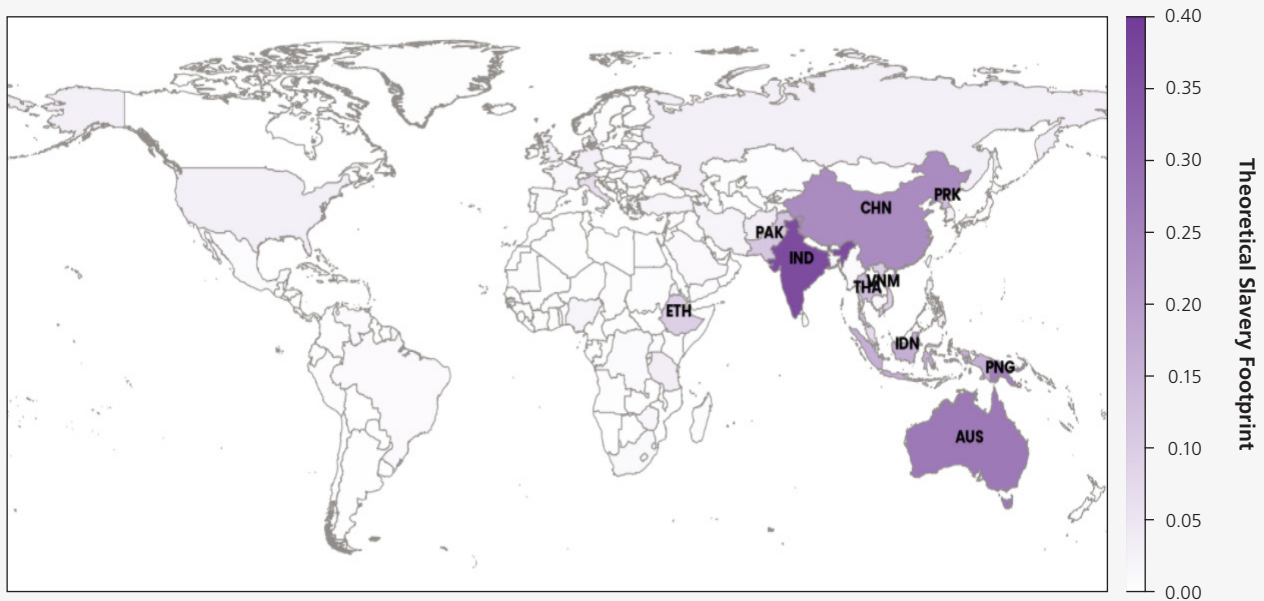
**Figure 1.1 – Top 15 Industry Risk Categories for Kennards Hire**

The following graph highlights our top 15 industry risks. Our Statement has focused on the Top 3 risks from this list by relative spend. It is clear that the largest spend and modern slavery risk is with our product and freight suppliers.



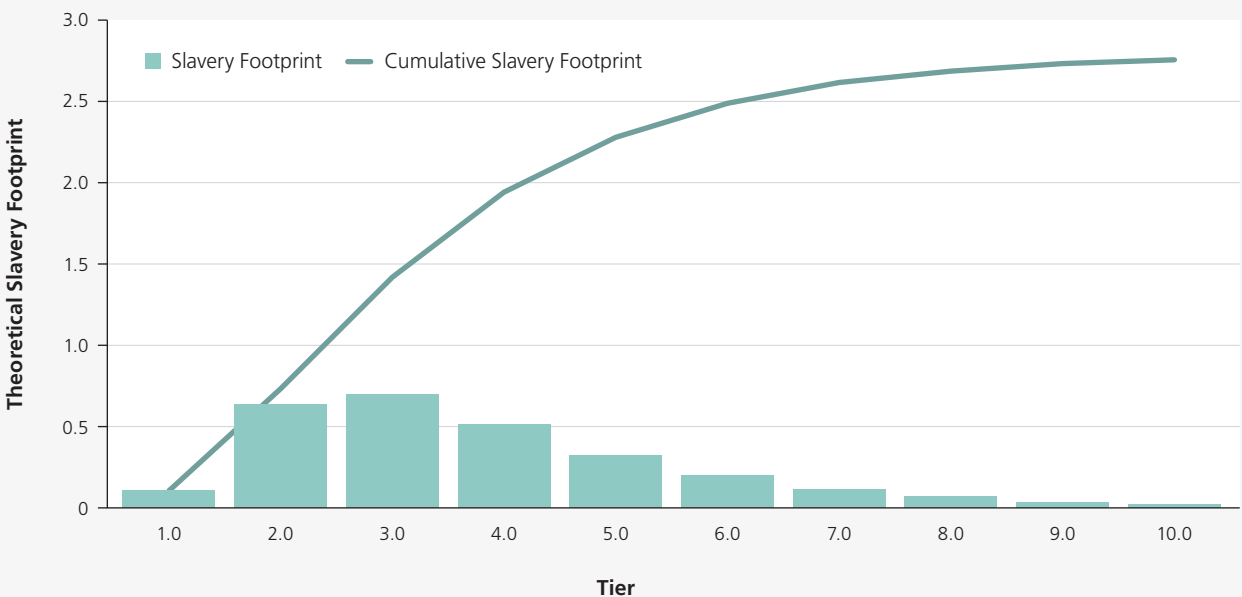
**Figure 1.2 – Modern Slavery Risks by Country**

The geographical heatmap below suggests that our modern slavery risks for products within our supply chain are likely to be concentrated in the Asia region. The risk is relatively concentrated in countries such as India and China, which has a high prevalence of modern slavery. Although we do not directly source products from these countries, these geographical risks may be present at lower tiers of our supply chain. The relative shading of the Australia region, represents the significant amount of spend we have with suppliers in Australia.



**Figure 1.3 – Modern Slavery Risk by Tier**

Figure 1.3 below indicates that our modern slavery risks are likely to accumulate at Tiers 2-4 of our supply chain, with a peak at Tier 3. This would suggest that our direct visibility of over our modern slavery risks may be limited and will require greater expectations on our suppliers to further engage with lower tier suppliers. This chart nevertheless provides us with a snapshot of where our additional due diligence efforts should concentrate, taking into account the elevation of risks at these tiers.





Kennards Hire Supplier Code Of Conduct

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## SUPPLIER CODE OF CONDUCT

### COMMITMENT

Kennards Hire (Kennards) is committed to conducting business in a safe, fair and equitable manner, in line with the company's core values and all applicable laws.

This Supplier Code of Conduct provides a framework of standards and behaviours we expect from suppliers (including any subsidiaries, affiliates and subcontractors) with whom Kennards enters into a relevant agreement for the supply of goods and services.

#### Kennards Values

- **Fair Dinkum**  
If we say we'll do something, we'll do it. Always true to our word, we lead by example and we don't over-complicate things.
- **Every Customer a Raving Fan**  
We like our customers and want them to leave safe and happy. Every customer is important, and if they've got a problem that needs solving, we just want to help.
- **Taking Hire Higher**  
We always look for ways to improve what we offer, and are proud of our position as an industry leader. We constantly aim to show customers the benefit of hire, and why it should be the first choice for their work.
- **One Family**  
Everyone going home safe each day is our number one priority. We care for our mates and treat each other like family. We work together to get things done and look after one another.

### HOW KENNARDS WORKS WITH SUPPLIERS

We strive to build long-term relationships with our suppliers by working in an open and ethical manner with a goal of delivering mutual benefit and improving commercial, environmental and social practices across our supply chain.

### MANAGEMENT SYSTEMS

Our suppliers should have systems that support the implementation of this code, or an equivalent standard, appropriate to the size and nature of their organisation, and appropriate to the goods or services they provide to Kennards.

Kennards expects that our suppliers will:

- Communicate the principles of this Code to relevant management, employees, supply chain and sub-contractors;
- Develop and implement documented practices in regard to WHS policies including systems to record work related injuries and illnesses;
- Proactively identify, manage, monitor and remediate any adverse impacts on society and the environment where their business is involved, in line with relevant laws and regulations and this Code;
- Keep adequate records to substantiate compliance with this Code and relevant laws and regulations;
- Be open and transparent about outsourcing of services, production or parts of production to a subcontractor;
- Be able to give an account of where goods ordered by Kennards are produced; and
- Adhere to the Kennards policies and procedures that are applicable to them.



**Kennards Hire Supplier Code Of Conduct**

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## **WORK HEALTH, SAFETY & ENVIRONMENTAL SUSTAINABILITY**

Kennards is committed to providing a healthy and safe working environment for all employees, contractors, and visitors. Kennards expects that our suppliers will:

- Fulfill requirements set out in any relevant Kennards policies and procedures relating to work health, safety and environmental management.
- Act within the reasonable direction of Kennards team members at applicable times.
- Abide by safe working practices and be appropriately skilled and display the continuity of work, care, character and safety in all interactions.
- Provide all necessary information, reference point and on-going support that is required to maintain a safe working environment.
- Ensure all employees wear and display the use of Personal Protective Equipment when required.
- Ensure employees are not under the influence of drugs or alcohol within the workplace.
- Comply with relevant standards, laws and conduct for any work completed in relation to Kennards.
- Implement and maintain a written Environmental Policy, Statement or Program inclusive of the identification of environmental risks, impacts and responsibilities, and provide access to this policy as requested.

## **PEOPLE**

Kennards is committed to protecting all employees and suppliers to ensure a fair and inclusive workplace by supporting fair labour practice. Kennards expects that our suppliers will:

- Protect human rights.
- Not discriminate against any worker based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, or union membership in hiring and other employment practices.
- Ensure fair wages, benefits and conditions, including working hours.
- Comply with all applicable laws and regulations.
- Have relevant workplace policies and practices in place to protect people such as a whistleblower policy, bullying, harassment, sexual harassment and anti-discrimination policies.

## **MODERN SLAVERY**

Kennards is a reporting entity under the Modern Slavery Act 2018 (Cth) (the Act) and is committed to efficient, effective, economical, ethical and sustainable practices in all procurement activities in a manner that minimises and mitigates risks of modern slavery. Modern Slavery is defined under the Act.

To assist Kennards in complying with its obligations under the Act and to ensure minimum standards are upheld Kennards expects that our direct suppliers and subcontractors will:

- Comply with all applicable laws and internationally recognised standards on labour rights and modern slavery, in all areas of operation.
- Uphold the human rights of workers in their operations and supply chains and to treat them with utmost dignity and respect.
- Avoid causing or contributing to modern slavery through their business activities and address risks of modern slavery impacts when they occur.
- Ensure all work is voluntary, and workers must be free to terminate their employment in accordance with an employment agreement provided in the workers native language. There shall be no unreasonable restrictions on workers freedom of movement including any restrictions on entering or exiting any company provided facility.
- Not employ workers who are less than 15 years old, or under the minimum age for employment in the country, whichever is greater. The supplier may provide legitimate workplace apprentice programs for educational benefit provided they are consistent with relevant International Labour Organisation Standards.
- Ensure that there is no no harsh and inhumane treatment including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment under any circumstances whatsoever. Suppliers are to ensure that disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.



#### Kennards Hire Supplier Code Of Conduct

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- Respect the right of all of its workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly, as well as giving corresponding respect to the right of workers to refrain from engaging in any such activities.
- Seek to exercise appropriate due diligence to prevent or mitigate modern slavery risks in direct operations and supply chains including products or services or business relationships.
- Use the process of risk assessment and reporting under the the Act as a means of seeking to meaningfully and practically address modern slavery in its operations and supply chain.
- Upon request by Kennards, provide reasonable assistance, including relevant information to enable Kennards perform periodic evaluations of its facilities and operations.

Kennards also expects that suppliers and subcontractors will take reasonably practicable steps towards the implementation of these requirements throughout their own supply chains. The intention is to identify, assess and address risks in a manner that involves consideration beyond entities with whom suppliers and subcontractors are in a direct contractual relationship for the provision of goods and services.

### COMPLIANCE AND GOVERNANCE

Suppliers must demonstrate implemented policies and practices for identifying risks, vulnerabilities and compliance obligations and must facilitate risk awareness and mitigation within their business. Kennards expects that our suppliers will:

- Engage in appropriate corporate governance and risk management practices;
- Comply with all applicable laws and regulations on bribery corruption, data collection, reporting and other business practices;
- Employ equitable and ethical business practices; and
- Conduct ongoing supplier monitoring and evaluation.

### IMPLICATIONS OF NON-COMPLIANCE WITH THE SUPPLIER CODE OF CONDUCT

Failure to meet or non-compliance with the standards set out in this code may lead to the following outcomes for suppliers doing business with Kennards:

- Termination of contracts
- Loss of future work
- Loss of reputation
- Investigation for corruption
- Matter referred for criminal investigation

In circumstances where this Code may establish higher standards than the law requires and addresses issues not covered by legislation, a Supplier is expected to voluntarily agree to abide by the additional higher standards and requirements set out in this Code.

In circumstances, where an Australian or different local law, regulation or contractual obligations impose a stricter standard than this Code, those legal requirements must be complied with and prevail to the extent of any inconsistency with this Code.

# ANNEXURE 1

## MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

### Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of

Kennards Hire Pty Ltd

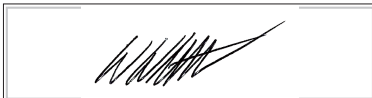
as defined by the *Modern Slavery Act 2018* (Cth)<sup>1</sup> (“the Act”) on 11/25/2021

### Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of

the Kennards Hire Board of Directors

as defined by the Act<sup>2</sup>:



William Whitehouse

Chief Executive Officer

### Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

| Mandatory criteria   | Page number/s |
|--|---------------|
| a) Identify the reporting entity.  | 5             |
| b) Describe the reporting entity’s structure, operations and supply chains.  | 5             |
| c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.  | 6             |
| d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.   | 8             |
| e) Describe how the reporting entity assesses the effectiveness of these actions.  | 10            |
| f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).* | 12            |
| g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**  | 12            |

\* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement ‘Do not own or control any other entities’ instead of a page number.

\*\* You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

1. Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

2. Section 4 of the Act defines a responsible member as: (a) an individual member of the entity’s principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001*—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.

