



CLARK EQUIPMENT WHS MANAGEMENT SYSTEM

Modern Slavery Act Policy (Statement)

WHS-POL-013

POLICY TITLE PAGE

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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 reasonable steps to ensure it in no way supports, encourages or condones 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 suppliers to also comply with modern slavery laws including prohibiting human slavery, forced labour, debt bondage, forced marriage and slavery like practice, human trafficking and child labour.

2 SCOPE

This statement is issued in accordance with the Modern Slavery Act 2018 (as amended 2024), in effect in Australia. This applies to all directors, officers, employees, contractors and suppliers.

Clark Equipment is subject to the requirements of the Modern Slavery Act 2018 (as amended 2024) 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 (as amended 2024)*
- *WHS-POL-012 Equity and Diversity Policy*
- *WHS-POL-015 Conflict of Interest and Ethical Conduct 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.



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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, 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 a manufacturer and distributor of plant and equipment, our operations inherently involve complex supply chains which span multiple tiers and geographies. This complexity increases the risk of modern slavery, particularly in the sourcing of raw materials and components from regions with weak labour protections or limited regulatory oversight. Risks may arise in industries such as electronics and metal fabrication, where forced labour and exploitative practices are more prevalent.

We recognise that modern slavery can occur at any stage of the supply chain, including subcontracted labour, logistics, and packaging, and we are committed to identifying and mitigating these risks through robust due diligence and supplier engagement.

Within our direct operations, while the risk of modern slavery is comparatively lower due to our compliance with Australian labour laws, we remain vigilant. Risks may still exist through outsourced services such as cleaning or security, where vulnerable workers may be exposed to coercion or deceptive recruitment practices.

We ensure that our contractors and service providers adhere to ethical labour standards and are subject to regular review. Our internal policies promote transparency, fair treatment, and grievance mechanisms to safeguard against exploitation.

In our global supply chain, visibility beyond Tier 1 suppliers remains a significant challenge. Many components used in our equipment may originate from countries with moderate modern slavery risk profiles, particularly in the metals sectors. To address this, we have started to implement supplier mapping and risk assessments, prioritising high-risk regions and industries.

We require suppliers to complete modern slavery questionnaires and agree to contractual clauses that prohibit modern slavery. These measures support our commitment to responsible sourcing and compliance with the Modern Slavery Act 2018, while also protecting our reputation and stakeholder trust.



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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. It is not possible to attend and review all current suppliers. We are continuing to focus on our tier one suppliers.

We have approved suppliers with which we continually update and monitor. If an issue is identified with a supplier, our procedures describe how 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.

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 have been 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.

Training of our procurement staff and HR team has occurred with updates and reviews scheduled annually.

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.



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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 GOVERNANCE

The Board of Directors is responsible for the oversight of the Modern Slavery risks.

The managers are responsible for:

- Implementing this policy
- Monitoring compliance
- Conducting supplier due diligence
- Reporting significant issues to the Board of Directors
- Preparing this annual Modern Slavery Statement

Day to day implementation rests with Purchasing, Operations, HR and Compliance persons.

11 CONTINUOUS IMPROVEMENT

The Company is committed to continuously strengthening its approach to managing modern slavery risks by:

- Reviewing this policy annually;
- Enhancing supply chain visibility;
- Improving due diligence processes;
- Engaging with suppliers and industry bodies;
- Monitoring legislative developments and best practices.



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12 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 2025 to 30 June 2026

This statement will be published on the Modern Slavery Statements Register and is thus publicly available.

END