

**CAVPOWER PTY LTD**  
**MODERN SLAVERY STATEMENT 2024**

1 July 2023 to 30 June 2024

**Fifth Modern Slavery Statement of Cavpower Pty Ltd**

This is the fifth Modern Slavery Statement under section 14 of the *Modern Slavery Act 2018* (Cth) ("**the Act**") made in respect of Cavpower Pty Ltd (ACN 007 735 300) ("**Cavpower**") and its wholly owned subsidiary Cavrent Pty Ltd (ACN 082 028 082) ("**Cavrent**"). Cavpower is a reporting entity under the Act.

This modern slavery statement sets out the actions undertaken by Cavpower to identify, address and mitigate modern slavery and human trafficking risks within its operations and supply chains for the financial year ending 30 June 2024. Cavpower has been operating in South Australia and Broken Hill since 1972 and offers products and services to support a variety of industries, including, but not limited to, construction, mining, oil and gas and marine.

Our Corporate Values are "Excellence, Teamwork, Accountability, Integrity & Fun." We prioritise doing business in an ethical manner and to deliver results benefit our team members, our communities and our customers. We seek to partner with suppliers that respect the importance and protection of human rights and that demonstrate a commitment to improve compliance in this area. We never compromise on our values, and Cavpower has a zero-tolerance approach towards instances of modern slavery in any form within its own operations and supply chains more broadly.

This year, we aim to educate our employees on modern slavery so that they are equipped to identify modern slavery risks and take the necessary actions to mitigate such risks. Further, Cavpower will continue to focus on consolidation of its preferred suppliers including specific questions on modern slavery compliance for all new suppliers we on-board. A survey will also be developed this year & provided to our top 20 suppliers to identify any gaps with their Modern Slavery compliance and assess and address any identified risks to Cavpower's Modern Slavery compliance.

This Modern Slavery Statement has been approved by the Board of Cavpower on 12 December 2024 and I have been authorised to sign this statement on their behalf.

  
Jo Jones (Dec 19, 2024 12:06 GMT+10:51)

Jo Jones, Director

Date: 19/12/24

## REPORTING ENTITY

This Statement has been produced by Cavpower Pty Ltd (ACN 007 735 300) ("**Cavpower**") on behalf of the entities that it owns and / or controls.

## STRUCTURE, OPERATIONS AND SUPPLY CHAINS

### Structure

Cavpower is a company headquartered in Adelaide, South Australia. Cavpower has a wholly owned subsidiary, Cavrent Pty Ltd (ACN 082 028 082) ("**Cavrent**"). Cavpower and its subsidiaries and related companies was acquired on 1 November 2023 by Sime Darby Industrial Machinery Australasia Pty Ltd ("**SDIMA**"). SDIMA is wholly owned by Sime Darby Industrial Australia Pty Ltd (SDIA). SDIA is a wholly owned subsidiary of Sime Darby Industrial Holdings Sdn Bhd, the industrial division of Malaysian investment holding company, SIME. The principal activities of companies within the industrial division are the sale, rental and servicing of CAT® products and delivering industrial solutions and services for customers in the mining, construction, transport, power generation, forestry, marine, and oil and gas sectors.

Cavpower is the primary operating entity and Cavrent operates the rental arm of the business. Both entities are subject to the same governance, policies, and procedures. Cavpower is associated with the CAT® brand and offers over 400 CAT® branded machines and power systems.

### Operations

Cavpower is the exclusive dealer for CAT® equipment in its designated service territory of South Australia and western New South Wales. More broadly, Cavpower retails new and used equipment, parts, associated services of equipment, and technology solutions (for example, fleet management solutions).

### Equipment

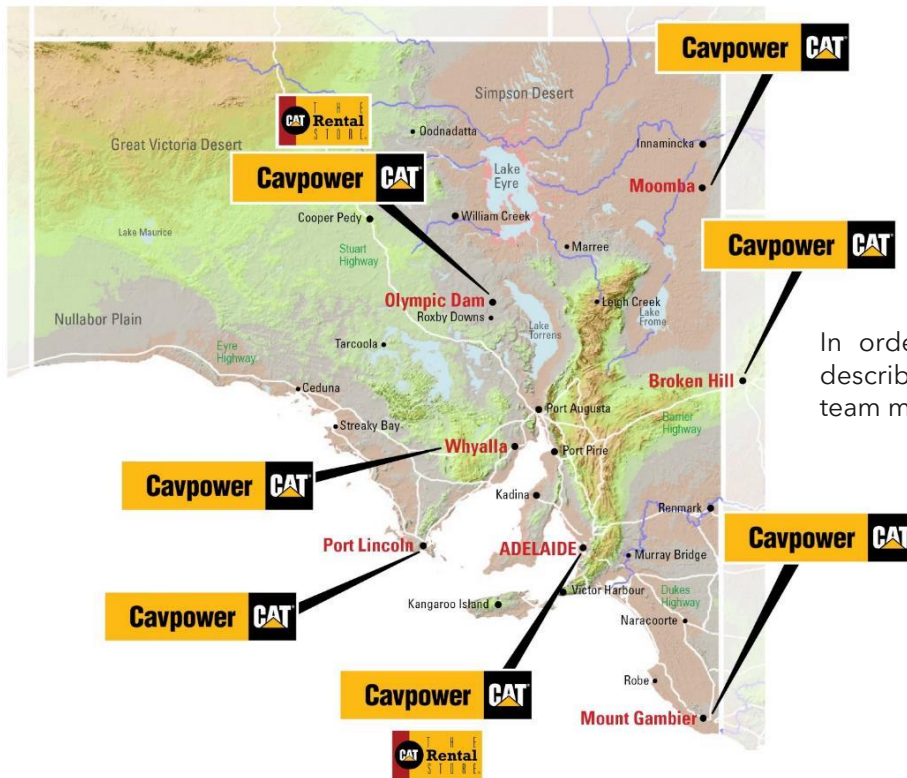
Cavpower is authorised to sell and rent CAT® earthmoving equipment, mining equipment and engines to support a variety of industries including construction, mining, energy, and transportation.

### Services

Alongside the sale of equipment, Cavpower provides services such as:

- Field Services Solutions: With over 80 vehicles and 2 lube trucks available on-road, Cavpower service CAT® equipment on site for its customers. Hydraulic Solutions: Cavpower's specialistic hydraulic workshop provides cylinder repairs. We can also design and manufacture new cylinder designs to assist our customers with bespoke projects.
  - Preventative Maintenance: Cavpower provide maintenance and inspection services for our customers on site or in-store. This assists our customers in reducing operating costs and pro-longs the life of the equipment component.
  - Operator Training: We are an authorised CAT® training provider and provide individual operators or groups at a variety of skill levels with training to assist them in using CAT® equipment effectively.
  - Welding and fabrication: Cavpower maintains the expertise and technical skills to perform metal fabrication services, from preparing the concept design to production of a finished product.
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Cavpower operates across eleven locations in both regional and metropolitan areas as follows:



In order to provide the operations as described above, Cavpower employs 471 team members across these locations.

## Suppliers and Supply Chains

Cavpower values its suppliers and generally has long-term stable supplier relationships, on agreed terms and conditions. Cavpower also makes payments to suppliers that are not on our preferred vendor list, however if they are used regularly, we undertake due diligence and include them as a preferred supplier.

During the FY24 reporting period, Cavpower had 598 active preferred suppliers registered.

Active Suppliers	
FY24	FY23
598	668

Of these suppliers, 98% are based in Australia and 2% are based in Singapore, USA, United Kingdom. Accordingly, our suppliers are primarily based in Australia.

FY24 saw a continued drop in active preferred suppliers. This was mainly due to further review and consolidation of vendors.

Our key supply chains can be summarised under the following categories:

Products	
Earthmoving Machinery & Equipment	Parts
Services	
Products to service retail products	Tools
Technology	
IT providers	Third party providers
Software (e.g., fleet management solutions)	
Ancillary Goods and Services	
Uniforms	Cleaning
Office supplies	Professional services (indirect categories and accountants, auditors, marketing, insurance, and legal services)

## RISKS OF MODERN SLAVERY

Modern slavery is a global issue. Factors such as high-risk jurisdictions, particular vulnerable populations and high-risk sectors increase the prevalence of modern slavery. We understand that modern slavery is globalised, complex and that we are not immune to the prevalence of modern slavery, with over 41,000 suspected cases of modern slavery in Australia.<sup>1</sup>

Cavpower recognises that certain products and services carry a higher risk for modern slavery compared to others. For example, products such as polysilicon are high-risk raw materials due to most of the polysilicon originating from the Xinjiang Uyghur Autonomous Region ("**Xinjiang**") in China which is known for its use of force labour camps. Other risk factors of modern slavery include:

- Geographical factors: certain countries and regions present higher risks of modern slavery. For example, Xinjiang, China.
- Sector and industry factors: industries and sectors that are known for containing higher risks of modern slavery. For example, the cleaning industry.
- Entity factors: certain entities carry heightened risks for modern slavery. For example, entities subject to Government sanctions or who have been part of prior litigation and legal action.

In addition to the above risk factors, the "cause, contribute to and directly linked to" framework from the UN Guiding Principles on Business and Human Rights is used to assess the linkages to modern slavery risks within Cavpower. Some examples of risk assessment under this framework are as follows:

<b>Cause</b>	Owning a factory that utilises child labour to carry out its operations.
<b>Contribute to</b>	Asking a supplier to fulfill a tight lead time for a project and ignoring evidence that suggests that workers were being exploited to meet these lead times.
<b>Directly linked to</b>	Engaging an equipment supplier that purchases raw materials from a supplier that uses child labour in its factory.

We have considered the risks of modern slavery in Cavpower's operations and supply chains, including those areas that carry a heightened risk of modern slavery based on the above risk factors.

## Operations

Cavpower's operations, including that of Cavrent, are centrally managed by Cavpower. Furthermore, as outlined above, Cavpower and Cavrent are subject to the same governance, policies, and procedures.

Across Cavpower and Cavrent, Cavpower:

- ensures adequate pay and entitlements in compliance with legislation or any applicable enterprise agreement or award and ensures regular reviews are undertaken;
- operates and maintains all facilities in line with work, health and safety laws;
- ensures that team members are aware and comply with the following Company policies:
  - HR 9-1 Code of Conduct;
  - HR 8-1 Discrimination, Harassment and Bullying;
  - HR 6-1 Industrial Relations and Grievance Handling; and
- have access to appropriate grievance mechanisms, resources, and team member assistance programs.

<sup>1</sup> According to the Walk Free Foundation's Global Slavery Index 2023.

Cavpower has a Whistleblower Policy in place with anonymous reporting available for team members and other eligible disclosers to use for any concerns related to modern slavery, breaches of policies, unethical business practices or other eligible disclosures. We have implemented a wellbeing policy for all team members that outlines the support programs available.

Accordingly, Cavpower considers that the risk of modern slavery in its operations is low. However, Cavpower does recognise that there are high-risk industries that it utilises to assist in running its operations, including cleaning services and labour hire (which is used on a limited basis).

## Supply Chains

Procurement choices can have significant impacts on an organisation's modern slavery risks. For example, short delivery timeframes and low costs can contribute to increased modern slavery risks and an organisation "contributing to" or being "direct linked to" modern slavery.

Whilst 98% of our tier 1 suppliers are based in Australia, 2% of our Tier 1 suppliers are based overseas in countries such as Singapore, USA, and United Kingdom. Of these suppliers, most are affiliated with CAT® or provide support to key business systems and software for CAT® products.

According to the Walk Free Foundation's Global Slavery Index 2023 ("**Global Slavery Index 2023**"), the prevalence and vulnerability ratings of our international suppliers are as follows:

Country	Prevalence <sup>2</sup>	Vulnerability <sup>3</sup>
Singapore	2.1	24
United States of America	3.3	25
United Kingdom	1.8	14

Overall, our international suppliers carry a low risk of modern slavery according to their prevalence and vulnerability ratings under the Global Slavery Index. However, many of our suppliers operate in high-risk industries or produce goods and commodities that carry heightened risks for modern slavery. Assessing actual modern slavery risks requires a multi-faceted approach which relies on the above data in conjunction with an assessment of specific supplier risk. Cavpower have identified high-risk industries which some of its suppliers operate in as outlined in the table below:

High Risk Industries	Explanation
Freight and Transport	Globally, the freight and transport industries carry heightened modern slavery risks. Many of the workers work in isolated conditions, meaning that workers in this industry are more vulnerable to modern slavery conditions.
Labour Hire	The labour hire industry is a complex industry due to the lack of visibility over the working arrangements between the labour hire organisation and the contractors and the significant movement of workers between different jobs. The risks that are particularly prevalent in this industry are risks such as the severe underpayment of workers and debt bondage arrangements.
Commercial Cleaning	The commercial cleaning industry is another complex industry, largely due to it attracting unskilled workers and migrant workers. This means that workers in the commercial cleaning industry are particularly vulnerable to modern slavery risks such as withholding of wages, excessive overtime, and substandard working conditions.  Migrant workers are particularly vulnerable to exploitation in the form of immigrated related coercion and threats and the confiscation of personal and travel documents.

<sup>2</sup> Prevalence data reflects the estimated proportion of the population living in modern slavery conditions per thousand people.

<sup>3</sup> Vulnerability score is out of 100. A higher score reflects a greater vulnerability to modern slavery.

Accordingly, the above industries present the highest risks to Cavpower in terms of being “directly linked to” instances of modern slavery in its supply chain. Cavpower acknowledges that supply chain risks are more likely to present deeper in our supply chains (for example, at Tier 2 and beyond levels), as is the case for most organisations in our increasingly globalised and complex world.

Our priority has been to reduce the number of labour hire workers that we engage, this contributing to lessen our business to exposure to modern slavery.

During this reporting period Cavpower decreased labour hire resources used in our Parts Distribution Centre by 9 (a decrease of more than 80%). Cavpower has also reviewed the scope of our commercial cleaning contract to reduce the reliance on contractors used in the high risk cleaning industry. As a result, one contract cleaner has been replaced with a permanent Cavpower team member. This review will of the use of contract cleaners has continued into the FY25 reporting period and will likely result in an expansion of our own cleaning team members.

## ACTIONS TAKEN

In this reporting period, we have undertaken the following actions to assess, address and mitigate risks of modern slavery in its operations and supply chains.

### Supplier Consolidation

A key focus for Cavpower in its modern slavery compliance framework has been to ensure that up to date due diligence is maintained across its supplier base. This presents significant challenges with a large supplier base. Accordingly, consolidating suppliers has been a continued priority for Cavpower.

Cavpower have continued with our supplier consolidation plan to reduce the number of suppliers used by our business. This continues to be a work in progress and will remain a focus into FY25. We have a KPI of 25% to reduce our one-time vendors by the end of FY25. Achieving this KPI will give us more insight into who are suppliers are and assist in implementing targeted due diligence on high-priority suppliers to then enable Cavpower to take more of a “risk based” approach with its due diligence. We have employed an additional procurement resource to review and evaluate suppliers to ensure we can meet our targets.

### Remediation

#### Monitoring and Remediation

For this reporting period we have continued to monitor our high-risk suppliers. To lessen Cavpower’s exposure to modern slavery we have worked to reduce the number of labour hire workers in several areas of the business. Cavpower has done this by engaging team members directly and not going through labour hire agencies. Across the business we have decreased our labour hire workers by 10 (more than 80%) for FY24.

Cavpower has changed the scope of our commercial cleaning requirements bringing this inhouse on our major work sites. This has allowed us to employ permanent cleaners, alleviating the requirement for as much exposure to this high-risk category.

Our due diligence continued as we engaged our high-risk suppliers and no remediation plans have been required to be put in place during the reporting period.

### Modern Slavery Policy and Supplier Code of Conduct

During this reporting period Cavpower’s Supplier Code of Conduct was completed and approved for distribution to our suppliers. Although only recently finalised, Cavpower’s Modern Slavery Policy has

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been implemented.

## Evaluation of Modern Slavery Compliance

Cavpower has continued to evaluate the broader modern slavery compliance and effectiveness of our current processes and procedures. We continue this as a work in progress, as we review our policies and procedures we evaluate them based on compliance to the modern slavery framework to see if there are any additional requirements that need to be implemented.

## ASSESSING EFFECTIVENESS

In this reporting period, a key action item was to complete our Modern Slavery Policy and Supplier Code of Conduct. This was to ensure we have a solid policy and procedure foundation for our modern slavery compliance framework which reflects the processes within our modern slavery compliance framework and our expectations on ourselves and our suppliers.

Based on the above, our key priority in this current reporting period is to review and continue to progress the foundational aspects of our modern slavery compliance framework with the aim of maturing them and embedding them within our organisation.

In the next reporting period, Cavpower's focus will be on further embedding our modern slavery compliance. The Modern Slavery Policy will be distributed to team members to ensure the team are aware of what to look for and how it can be reported so that we can be part of the solution to eradicating modern slavery within our own supply chains.

## Consultation

Cavpower wholly owns and controls Cavrent which shares the same policies, systems and governance structures with Cavpower.

As Cavrent shares the same policies, systems, and governance with Cavpower, consultation with Cavrent has been extensive in the preparation of this Statement, which has included robust discussions about Cavpower's reporting requirements under the Act between key stakeholders in both entities.

Accordingly, this Statement is an accurate reflection of the measures and actions taken by Cavpower and Cavrent.

## Future Actions for 2025 reporting period

- The Commercial team, with its increased resources will continue to focus on reducing the risk of exposure to modern slavery non-compliance in the supply chain. We will engage with our suppliers through a modern slavery questionnaire during the on-boarding process to check vendor compliance with modern slavery controls, including whether that supplier has a modern slavery policy, particularly for suppliers in high-risk industries.
  - Continue with our vendor consolidation plan to ensure the reduction in the number of suppliers used, including a tightening in controls for the use of one-time suppliers. A preferred Vendor list to be established and made available to the business via a new portal that team members can use to search by keywords to find suitable preferred suppliers to ensure compliant suppliers are used where possible.
  - Cavpower's Modern Slavery Statement to be linked to our website and suppliers directed to it
  - Educate our workforce through our weekly toolbox meetings - to include a guide on "What is Modern Slavery?" and "What I can do if I become aware of it?"
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# Modern Slavery Statement 2024

- Update our standard terms and conditions of trade (for suppliers) to include a Modern Slavery clause requiring that the supplier comply with reasonable requirements of Cavpower for the purposes of Cavpower's compliance with Modern Slavery legislation
- Further survey to be sent out to our top 20 suppliers to identify any gaps with their Modern Slavery compliance, and assess and address any identified risks to Cavpower's Modern Slavery compliance.

