

# MODERN SLAVERY STATEMENT 2022

**UNITED**  
Forklift and  
Access Solutions

# 1. Introduction

This Modern Slavery Statement (Statement) is made in accordance with the Modern Slavery Act 2018 (Cth) (the **Act**). This is United Equipment Pty Ltd's (**United Equipment**) third Modern Slavery Statement.

United Equipment recognises that modern slavery is a complex issue that can manifest in a variety of ways in the operations and supply chains of businesses. Modern slavery affects workers, individuals and communities globally on an enormous scale. We are determined to work collaboratively with our suppliers and other stakeholders to play our part in ending modern slavery.

Modern slavery rarely occurs in isolation and can form part of more complex issues, including wider discrimination and exploitation of workers. Examples of modern slavery include slavery, servitude, child labour, forced labour, human trafficking, debt bondage, slavery like practices, forced marriage and deceptive recruiting for labour or services.

United Equipment remains committed to acting responsibly and with high ethical standards. We have sought to integrate high ethical standards within our corporate culture and continue to stay conscious of issues surrounding modern slavery practices. We are guided by our core values set out below, including in particular our value of 'nurturing' in which we ensure that we care for and protect our people and our customers, providing support and opportunities in a safe environment.

## Core Values



We have and continue to develop processes and procedures to identify and remedy instances of modern slavery and recognise that enormous work is needed, globally, to address these issues.

This Modern Slavery Statement describes the structure, operations and supply chains of United Equipment, and the risks of modern slavery in those operations and supply chains during the period 1st July 2021 to 30th June 2022 (**Reporting Period**). It also details the actions taken by United Equipment to minimise the identified risks and the effectiveness of those actions.

# 2. Reporting Entity

This Modern Slavery Statement has been prepared in accordance with the Act.

The reporting entity covered by this modern slavery statement is:

**United Equipment Pty Ltd** ABN 48 115 672 841.

United Equipment is an Australian proprietary company with its registered office in Welshpool, Western Australia.

### 3. Structure, Operations and Supply Chain of United Equipment

#### Structure

United Equipment Pty Ltd (ACN 115 672 841), trading as United Forklift and Access Solutions, is a privately owned Forklift and Access equipment company, servicing customers only in Australia. We are a member of the Elphinstone Group of companies.

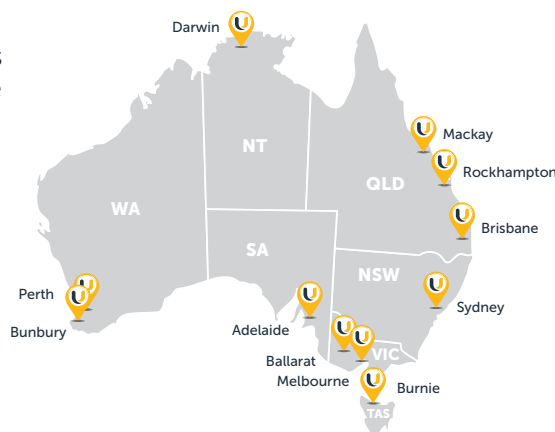
Headquartered in Perth, WA, we have branches in all states of Australia. We have approximately 380 full time employees. Employees are engaged in a range of roles including management, sales, administration and equipment servicing. Branch managers are responsible for operations in each location and report directly to head office.

#### Operations

Our core operations are Sales, Service & Rental of forklifts and access equipment. Our primary brands include: Caterpillar Forklifts, Haulotte and Almac Access Equipment and Konecranes container handler and forklifts, all of which are manufactured overseas.

Our operations are supported by the following functions:

- ▶ Finance and Credit,
- ▶ Legal and Risk Management,
- ▶ Human Resources,
- ▶ Information Services, and
- ▶ Marketing.



#### Supply Chain

We have approximately 600 active vendors, with our top 20 vendors accounting for almost 80% of total spend. These suppliers provide a wide variety of products and services, ranging from imported equipment and parts to locally acquired products, services and utilities. These vendors are each individually assessed prior to obtaining approved supplier status.

There has been little change in the United Equipment supply chain during the reporting period. The supply chain remains complex and diverse, encompassing businesses in size from small family operated businesses through to global corporations.

### 4. Modern Slavery Risks

At a high level, United Equipment acknowledges that there are risks that modern slavery practices may occur within its supply chains and operations that may lead to United Equipment **causing, contributing to,** or being **directly linked** to modern slavery. We discuss each of these elements below.

United Equipment considers the risk that it is responsible for directly **causing** modern slavery is very low. We have a range of internal control and governance measures designed to foster (and monitor) ethical business conduct in everything we do.

Also, through our culture of continuous improvement, we continue adding to these existing measures to mature our understanding of modern slavery and further strengthen our framework for identifying, assessing and addressing modern slavery risk within our operation and supply chain. Internal personnel risk is largely managed by our professional and thorough recruitment practices. United Equipment predominantly engages its employees on permanent employment contracts and has policies, procedures and resources to ensure compliance with relevant laws, including with respect to employee pay and entitlements.

Other policies contributing to the ethical treatment of our personnel and other people in our operations include our:

- ▶ Code of Conduct,
- ▶ Equal Opportunity, Anti-Discrimination, Harassment & Bullying Policy, and
- ▶ Anti-bribery and Corruption Policy.

United Equipment also has a Whistleblower Policy with anonymous reporting available to employees to raise any concerns regarding modern slavery (as well as other illegal, unethical, fraudulent or undesirable conduct). In addition, all employees have access to an independent employee assistance program.

There is some risk within United Equipment's supply chain that it may **contribute** to modern slavery, however United Equipment considers that the risk is very low. United Equipment always aims to treat its suppliers ethically and would never knowingly act in a way (such as through the exertion of commercial pressure or the imposition of contractual terms and conditions) that directly or indirectly incentivises a supplier to engage in modern slavery practices.

United Equipment recognises that there is also a risk that it may be **directly linked** to modern slavery practices as a consequence of its suppliers, or suppliers to its suppliers, engaging in modern slavery activities without United Equipment's knowledge.

As part of its ongoing commitment and effort to better understand its supply chain risks, United Equipment has undertaken another assessment of its most significant suppliers. The review process has allowed us to continue to update our supplier lists to optimise the risk analysis that we perform.

To further assess the risks associated with our most significant suppliers, we have continued engaging with those suppliers via a supplier questionnaire. This process has allowed United Equipment to get a clearer understanding of its supply chain whilst also bringing the issue to the forefront of our suppliers' minds and ensuring they are aware of our expectations and remain fully committed to strengthening their knowledge and capabilities in this area.

United Equipment will continue to build on the process of engagement with suppliers, especially those identified as high or medium risk to investigate areas of improvement and/or potential alternatives.

## 5. Actions to Assess and Address Modern Slavery Risks

During the Reporting Period, United Equipment has maintained a proactive and multi-faceted approach to Modern Slavery mitigation and prevention. It has taken numerous actions to assess and address the risks of modern slavery within its operations and supply chains.

Some of the actions and outcomes that United Equipment has undertaken during the Reporting Period are outlined below:

### Assessment of risks

- ▶ Engaging with senior management to ensure appropriate oversight for compliance with the Act and in assessing modern slavery risks more generally.
- ▶ Updating the register of United Equipment's suppliers to record risks of modern slavery within the supply chain that were identified during the previous reporting period. Continual audit and revision of suppliers to identify relevant risks.
- ▶ Continual roll out of supplier questionnaire for existing suppliers to complete and for use during the onboarding process of new suppliers to more fully assess the risks associated with suppliers.

### Addressing and mitigating the risks of modern slavery

- ▶ Continuously monitoring compliance with the United Equipment Modern Slavery Policy and Supplier Code of Conduct by United Equipment and its supplier to mitigate risks of modern slavery being present in our operations and supply chain.
- ▶ Continuing the requirements for suppliers to assess and address modern slavery risks in their own supply chains including to allow United Equipment to audit suppliers and to terminate agreements for non-compliance with modern slavery obligations.
- ▶ Updating our website to ensure transparency in United Equipment's modern slavery prevention initiatives, including publication of the 2020 Modern Slavery Statement and Supplier Code of Conduct.
- ▶ Company-wide communications to increase awareness amongst our entire workforce of the prevalence and risks of modern slavery, and what actions can be taken to minimise those risks.



## 6. Assessing the Effectiveness of Actions

As modern slavery issues are so complex and wide ranging, it is difficult to measure the effectiveness of single actions. We are pleased with the overall increased awareness of modern slavery issues across the whole business.

In assessing the effectiveness of the actions we have taken in this and previous Reporting Periods to assess and address modern slavery risks, we report the following outcomes:

- ▶ The work we have undertaken around the assessment and continuous monitoring of our suppliers has given us a greater understanding of the participants in our supply chain which will allow us to further address these issues in future reporting periods,
- ▶ We continue to increase our understanding of the prevalence of modern slavery and the actions we can take to minimise the risks,
- ▶ Our suppliers are contractually obliged to investigate, assess and address modern slavery risks within their operations and supply chains and those obligations are becoming more accepted and widely understood,
- ▶ In our capacity as a supplier, we readily agree to comply with modern slavery minimisation and reporting requirements of our customers and we actively participate with our customers to ensure our own compliance with modern slavery laws.

## 7. Process of Consultation

United Equipment does not own or control any operating entities that require consultation in relation to modern slavery risks under the Act. United Equipment continues to engage in discussions with other businesses to better understand and share experiences in assessing and addressing modern slavery within the respective organisations.

This statement, and the work undertaken in addressing modern slavery risks, has been prepared and undertaken with input from relevant areas of the United Equipment organisation, including procurement, finance, legal and senior management.

## 8. Looking Forward

United Equipment remains committed to continuous improvement of its procurement processes and identifying and minimising modern slavery within its operations and supply chain.

It is our aim to undertake ongoing monitoring of modern slavery risks and continue to identify areas for improvement. To achieve this we will continue to engage with our suppliers to understand the risk profile in relation to modern slavery and mitigate those risks where possible.

United Equipment will widen the scope of its supplier risk analysis process in the future, with a view to increasing its engagement with suppliers identified as high or medium risk and to investigate areas of improvement or, if that is not possible, seek potential alternatives.

We will seek to increase employee awareness of modern slavery risks, in particular within our procurement team, and undertake further training in relation to the impact modern slavery has across our business and more widely.

## 9. Approval of Modern Slavery Statement

This statement was approved by the board of directors United Equipment Pty Ltd on 14th December 2022.



**David Maxwell**  
Managing Director

# Appendix

This Modern Slavery Statement was prepared to address the mandatory criteria and to ensure compliance with the Modern Slavery Act 2018.

The table below sets out where each mandatory criterion is addressed within the statement.

Mandatory Criteria		Page Number
1.	Identify reporting entity.	2
2.	The structure, operations and supply chains of the reporting entity.	3
3.	The risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	3-4
4.	The actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks.	4
5.	How the reporting entity assesses the effectiveness of such actions.	5
6.	The process of consultation with any entities the reporting entity owns or controls or is issuing a joint modern slavery statement with.	5
7.	Any other information that the reporting entity, or the entity giving the statement, considers relevant.	5

**T: 131 607 [unitedequipment.com.au](http://unitedequipment.com.au)**



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