

# MODERN SLAVERY STATEMENT

Onsite Rental Group Limited  
L1/Suite 1.01 201 Miller Street North Sydney NSW 2060

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# MODERN SLAVERY STATEMENT

Onsite Rental Group Limited ACN 126 396 852

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## Purpose

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

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

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

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

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

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

For the purposes of this Statement, references to “Onsite” are to Onsite Rental Group Limited and to each of its wholly owned subsidiaries.

# Structure and Operations

Onsite Rental Group Ltd is the parent company for the Onsite group of companies, and the overall structure of the group for the year ending 30 June 2023 is as set out below.



On 3 April 2023, Sime Darby Allied Operations Pty Ltd (**SDAO**) acquired Onsite Rental Group Pty Ltd and its subsidiaries. SDAO is wholly owned by Sime Darby Industrial Australia Pty Ltd (**SDIA**). SDIA is a wholly owned subsidiary of Sime Darby Industrial Holdings Sdn Bhd (**Sime Darby Industrial**), the industrial division of Malaysian investment holding company, Sime Darby Berhad. The principal activities of companies within the industrial division are the sale, rental and servicing of Caterpillar products and also delivering industrial solutions and services for customers in the mining, construction, transport, power generation, forestry, marine, and oil and gas sectors.

The operations and business of Prime Rentals Pty Ltd (**Prime**) has been incorporated into those of Onsite Rental Group Operations Pty Ltd, (**ORGO**) with Prime remaining registered for the sole purpose of allowing historical claims and assets to be finalised with ORGO actively taking steps towards ensuring that any legacy contracts held by that subsidiary are novated across to ORGO, in anticipation of ORGO deregistering the subsidiary.

While Onsite Rental Group Ltd is the parent company of ORGO, ORGO remains the primary trading entity under the control of its parent company. The management of ORGO hold key positions in the Board of

Directors of the parent company, ensuring the parent company is closely linked to and apprised of the business being conducted by ORGO.

In preparing this Modern Slavery Statement, ORGO, as the primary trading entity of the Onsite group was made aware of Onsite's obligations under the Modern Slavery Act 2018 (Cth), including but not limited to the obligation to carry out and implement due diligence throughout its operations, identify risk and provide meaningful feedback at to the actions undertaken and anticipated such that the information could be incorporated into the Statement. In carrying out these steps, ORGO has treated the business and operations of each of its subsidiaries (if any) as forming part of its own business, thereby ensuring that each of the reporting entities have been included in and covered by this Statement prepared for and on behalf of the entire Onsite group of companies.

## Supply Chain & Risks of Modern Slavery Practices

Onsite is a specialist business to business equipment rental business and has been operating for over 30 years in the industry. Onsite provides employment to around 500 staff across over 35 branches and satellite branches. With over 70,000 pieces of equipment for hire, the branch offices are based in Western Australia, South Australia, Queensland, Northern Territory, New South Wales and Victoria. Onsite's head office is based in North Sydney, NSW.

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

### Supply Chain

#### Machinery and Equipment

During 2023 Onsite has been identifying its key suppliers of machinery and equipment across all 5 of its product groups. The majority of the equipment is purchased from Australian suppliers, however USA, UK, China, Italy, Belgium, Spain, France, Romania, Indonesia, Japan and Vietnam were identified as the original source.

Onsite's customer base is located in and around Australia, however from time to time, it is invited to tender for offshore opportunities based in Papua New Guinea. To date, these opportunities have not been realised, however there is potential for the business to expand into that space. In the event that occurs, the additional risks of supplying Equipment to a high-risk overseas country would need to be evaluated.

After its useful life, Onsite sells used equipment through auction houses or direct sales to Australian business and overseas. Whilst Onsite does not knowingly engage or contribute to modern slavery practices, Onsite recognises that there may be parts of the purchase or sales to higher risk countries which make up components of our supply chain.

#### Work Force

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

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

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

#### Trades and Subcontracting

Onsite also procures services from the providers including:

- Equipment transport services based locally near the customers' sites.
- Equipment installation and dismantling services based locally near the customers' sites.
- General services providers (e.g., electricians) based locally near the customers' sites.
- Consultancy, recruitment, legal, accounting and tax services.

All of these subcontractors are domiciled in Australia.

### Risks of Modern Slavery Practices

Onsite does not consider that it has a high risk of directly causing or contributed to modern slavery, however, it recognises that the risks of modern slavery may vary and increase through its supply chain, depending on the sector, business location, operations and external workforce of those suppliers. Over the past 12 months, Onsite has refined its onboarding processes to which requires positive compliance with a documented registration and pre-qualification exercise which assesses their background, technical expertise and financial capability. The process also requires Suppliers to submit copies of policies and quality standards for review by the Group. Suppliers are also required to make a representation that they comply with all laws related to anti-slavery and prohibited business practices.

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

- On the construction sites – failure to provide a healthy and safe workplace.
- In certain industries e.g., transport – long hours of working.
- Manufacturers in the high-risk countries – child labour, forced labour, bonded labour.
- Manufacturers in the high-risk countries – unfair working conditions including underpayment and failure to provide employees entitlements.
- In the remote areas in Australia – inadequate housing conditions; long hours of working and unfair working conditions
- Discrimination (including pay gap) based on gender, age, race, disability, sexual orientation, cultural background, religion, pregnancy, family responsibilities.
- Likely involvement of labour recruiters and other third-party agencies in the recruitment of workers.
- The potential for inadvertent occurrence of exploitive practices in Onsite's smaller suppliers who consider themselves exempt from the requirements of Modern Slavery Act 2018 (Cth).

# Development of Policies and Processes

## Ethical Business Policy in Onsite's Supply Chains

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

The parties covered by the Ethical Business Policy (including Onsite's suppliers, contractors and other business partners) warrant *that* their operations and supply chains are free from all forms of forced labour and slavery, and (if applicable) that they comply with the Modern Slavery Act 2018 (Cth). They are required to establish processes and procedures, including the reporting of the instances of unethical conduct (including forced labour and slavery and other breaches of human rights) and the remediation process to Onsite.

## Workers' Policies and Welfare Arrangements

Onsite has in place the following workers policies, arrangements and plans which cover areas including labour standards, human rights and workplace health and safety:

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

## Human Rights Charter

As a member of the Sime Darby group, Onsite is subject to Sime Darby's Human Rights Charter which was rolled out in 2023. This Charter encourages an inclusive, diverse and respectful work environment which embraces human rights and reinforces Onsite's commitment to addressing the impact or modern slavery risks to our operations and supply chain. The Charter outlines a spectrum that ranges from decent work to serious criminal exploitation and a comprehensive outline of the various measures in place which encourage greater transparency, due diligence and risk mitigation in the context of human rights and modern slavery compliance.

## Reporting of Modern Slavery Concerns

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

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

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

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

Over the course of Onsite's 3<sup>rd</sup> reporting period, the business has enforced a requirement that all new suppliers provide a positive acknowledgement and commitment to complying with Onsite's Ethical Business Policy as a precondition to being set up as a vendor. This provides Onsite with a level of assurance that all suppliers are aware of the mechanisms and avenues through which they can raise concern with Onsite.

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

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

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

# Assessing & Managing Modern Slavery Risks

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

## Recruitment Process

As part of Onsite's recruitment procedures, Onsite only uses reputable recruitment firms. Employees or potential employees do not pay the recruitment firms. Onsite carefully assesses the terms of engagement with any recruitment firms to ensure there are mechanisms and guidelines in place to minimise risks of modern slavery in the supply chain during the recruitment process.

## Training provided to employees

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

Mandatory training is offered to all of our work force, with specific training to focussing on the additional human resource risks and training for our staff employed on Working Visa. The general training modules are conducted on the employee portal SharePoint and on site and are reviewed annually to ensure the training material is current and aligned with statutory changes.

## Suppliers Due Diligence

Onsite has in place a supply chain due diligence mechanism. Onsite has compiled a Supplier database and created a user-friendly modern slavery questionnaire to be completed by all the suppliers.

## New Suppliers Onboarding

Onsite's supplier onboarding process currently requires the completion of the Modern Slavery questionnaire to gauge the Supplier's adherence with the requirements. Our newly refined onboarding process requires a positive compliance from the Supplier with a documented registration and pre-qualification exercise which assesses their background, technical expertise and financial capability. Suppliers are also required to make a representation that they comply with all laws related to anti-slavery and prohibited business practices.

## Contractual Protections

Onsite has reviewed and updated its supplier contracts and transport service provider agreements. Onsite is also in the process of updating its standard customer terms and conditions. Onsite's updated supplier contract terms include the assessment and identification of modern slavery risks, and warranties that suppliers comply with all modern slavery laws and report any concerns to Onsite. The suppliers' compliance with the Onsite's Ethical Business Policy being a KPI or contractual clause. Onsite's updated transport service provider agreements have a greater focus on compliance with Australian Chain of Responsibility laws which is important given the modern slavery risks associated with driver fatigue and prolonged working hours often associated with modern slavery practices.

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

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

## Measuring the effectiveness

In 2023, the principal focus has been on implementing our Modern Slavery and ethical business framework and enforcing this framework across its the supply chain. This has been integral in enabling Onsite to have greater oversight across its supply chain to better understand how the risks of modern slavery may manifest over the course of our operations and supply chains.

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

- ensuring procedural compliance across the board when engaging with external service providers and suppliers including but not limited to the supplier onboarding process, questionnaire-response process and contract performance/delivery process.
- monitoring frequency and trends of whistleblowing channels (STOPLine); and
- monitoring completion rates and examination results as it relates to learning and development modules across the Onsite workforce.

## Consultations & Continuous Journey

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

### Risk & Compliance:

Development of the Modern Slavery Risk Register with a focus on distinguishing between suppliers based on various parameters including frequency of engagement, nature of services / products being supplied, and degree of modern slavery risk associated with those services/products. Expanding the register will assist the team to effectively evaluate and identify the high and medium risk areas as identified in this Statement and will allow the business to take material steps which can be taken to better focus on the higher risk categories and activities to ensure that greater due diligence is undertaken in those areas.

### Workforce Training:

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

It is expected that training will continue to be refreshed annually to ensure the content is current and consistent with statutory updates. The workforce training will consist of various learning modules that reflects the varied environments in which Onsite conducts its business, from corporate offices through to remote branches, or satellite branches on customer premises targeting all of the diverse roles in the business and presenting information to better familiarise the workforce with modern slavery risks and mitigation strategies, increasing the chances of effective risk identification and reporting by the workforce.

Development of the commercial teams when tendering for or engaging new suppliers or contractors and ensuring a standardised system for evaluating that external party's adherence and commitment to upholding ethical business practices, free from modern slavery in any form.

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

### Administrative Framework:

Rollout of an updated set of terms and conditions for our customers reinforcing the existing Modern Slavery compliance measures.

Ensure proper acceptance of Onsite's terms and conditions, Supplier Agreements and Services Agreements without inappropriate deviations in the context of Modern Slavery compliance.

From a business perspective, develop Key Performance Indicators that are specific and measurable by which the effectiveness of the steps taken by Onsite can be assessed. These performance indicators would be used to identify the progress made in areas such as human resources practices – particularly with regard to overseas recruitment, onboarding, training and education, procurement and vendor selection through the supply chain, due diligence and focus areas, reporting of concerns and grievances and effectiveness of remediation notices.

### Policy Development:

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

This statement is made pursuant to section 13 of the Modern Slavery Act 2018 (Cth) and constitutes the Modern Slavery Statement of Onsite Rental Group Limited for the year ending 30 June 2023, and is approved by the Board of Onsite Rental Group Ltd and I have been authorised to sign this statement on their behalf.

A handwritten signature in black ink, appearing to be "Mike Foureur".

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Mike Foureur  
Chief Executive Officer

Dated: 6 December 2023