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## MODERN SLAVERY POLICY

### Purpose

The purpose of this policy is to set out Borger Cranes' position and guidelines for modern slavery and to:

- prevent, detect and respond with mitigating controls to the risk of modern slavery occurring within Borger Cranes' subcontractors or supplier's organisations or in any other business relationships;
- demonstrate Borger Cranes' commitment to only doing business with other companies or suppliers who fully comply with the Act;
- ensure compliance with the Act (as may be amended from time to time);
- complies with all applicable national, local and other applicable regulations; and
- sets minimum standards for staff with respect to the identification of modern slavery risks.

### Application

This is a company policy of Borger Cranes and its related entities.

It applies to all directors, officers, employees, contractors and consultants (collectively referred to as Staff) of Borger Cranes and their suppliers.

### Policy

#### 1 Definitions

Modern Slavery is a crime and violation of human rights and is defined under the Australian Modern Slavery Act 2018 (the Act) as including eight types of serious exploitation:

- trafficking in persons;
- slavery;
- servitude;
- forced marriage;
- forced labour;
- debt bondage;
- deceptive recruiting; and
- child labour.

Modern slavery is depriving a person of freedom for commercial gain in violation of fundamental human rights and where offenders use coercion, threats or deception to exploit victims and undermine their freedom. The types of exploitation can be complex, multi-faceted and difficult to spot.

#### 2 Requirements

Borger Cranes is committed to ensuring that their suppliers and companies they work with do not involve modern slavery practices.

The key Policy requirements are that:

- each business unit management will perform its operations in a way that mitigates the risk of modern slavery in its business and through its suppliers;
- each contract owner must, as far as practicable, include in their operational and supplier contract terms, requirements that suppliers comply with all local, national and other applicable laws and regulations in the areas in which they operate;
- Borger Cranes' supplier policies and procedures should include specific prohibition of modern slavery;
- all new suppliers are to be subject to a risk-based due diligence assessment prior to onboarding; and
- contract owners who manage existing vendor relationships must implement a risk-based approach to review the vendor's modern slavery risks and disclosures;

### **3 Responsibilities**

Borger Cranes is working on implementing effective systems and controls to understand, manage and minimise instances of modern slavery within our business and our suppliers. This includes:

- drafting and finalising a Modern Slavery Statement in accordance with Modern Slavery legislation;
- conducting modern slavery due diligence risk assessments to identify, prevent and mitigate modern slavery risks in our operations and our suppliers;
- developing a supplier code of conduct for implementation within our operations and suppliers;
- contractually requiring our subcontractors and suppliers to take reasonable steps to identify and address modern slavery risks;
- raising awareness of modern slavery risks, including training tools and communications; and
- continuously improving our existing processes to tackle slavery.

Borger Cranes' Staff must take all reasonable steps to ensure that the business and suppliers are free of modern slavery practices. Their responsibilities include:

- complying with this policy and reasonable requests regarding Borger Cranes' modern slavery procedures;
- reporting reasonably suspected cases of modern slavery;
- participating in modern slavery training;
- leading by example and making appropriate checks on employees, subcontractors and suppliers;
- remaining alert to indicators of slavery; and
- paying close attention to risk areas in with our suppliers such as outsourcing in jurisdictions without adequate safeguards.

### **4 Reporting Behaviour**

Borger Cranes acknowledges that any actual or suspected instances of modern slavery occurring with subcontractors or suppliers they do business with will be documented and notified to the correct reporting channels.

Reporting behaviour of suspected modern slavery within a business will ensure that employees are not disadvantaged in any way for reporting such concerns and that the report is dealt with promptly and fairly and that any sensitive information provided is dealt with appropriately and discretely.

## 5 Policy Violations

A violation of this policy will be taken seriously and will need to be dealt with on a case-by-case basis. This may include:

- investigating a subcontractors or supplier's practices and preventing further engagement with them or otherwise working together; and
- providing assistance to the parties in remediating the situation.

### Review

This policy will be reviewed annually.

Version	Revision Date	Summary of Changes	Approved
1	24.11.2019	Original Policy Drafting	Shawn Borger
2	28.09.2023	Re-drafted Policy and updated Formatting	Shawn Borger