Environment, Social, Governance (ESG)

1. Purpose

Adaptalift Group ("Adaptalift", "we", "our", "us") is an Australian, privately owned business operating in the materials handling, access, and construction markets. This Environment, Social and Governance (ESG) Policy sets out our overarching approach to managing the environmental, social and governance matters most relevant to our business, our people, our customers, our supply chains and the communities in which we operate.

We aim to limit, so far as is reasonably practicable, the adverse impacts of our operations, while making a positive and sustainable contribution to our people, our communities and the environment. This Policy is intended to be a statement of principle and intent. It establishes the framework within which more detailed policies, procedures and standards operate and is deliberately structured to accommodate our ESG maturity as it develops over time.

2. Scope

This Policy applies to all Adaptalift directors, officers, employees, labour hire personnel and, where relevant, agency-supplied personnel, contractors and suppliers acting for or on behalf of Adaptalift. It applies across all branch and service locations at which Adaptalift operates.

This Policy should be read together with the reference documents listed in Section 8.

3. Our approach and commitments

Adaptalift takes a measured, risk-based and legally grounded approach to ESG. Our commitments are calibrated to what is operationally and economically achievable and are implemented on a "so far as is reasonably practicable" basis. Where this Policy expresses aims, aspirations or intentions, these are goals we work towards rather than fixed guarantees, and they will be pursued in a manner consistent with our commercial circumstances and obligations.

We are committed to:

- Complying with all applicable laws, regulations, standards and codes of practice in the jurisdictions in which we operate;
- Meeting our sustainability and climate-related reporting obligations as they apply to Adaptalift, and preparing for them in a manner proportionate to our circumstances;
- Managing our material ESG risks through our established governance and risk management structures; and
- Reviewing and improving our ESG approach over time as our maturity, systems and data capability develop.

Supporting documents. This Policy is Adaptalift's umbrella statement of ESG intent. It is given effect through Adaptalift's supporting policies, procedures and management systems, which set out more detailed responsibilities, standards and performance measures. These supporting documents are reviewed and updated over time as Adaptalift's systems, data and circumstances evolve. Where any specific objective, target or timeframe is set in a supporting document, it is an internal planning objective and does not form part of this Policy or create a binding commitment except to the extent required by law.

4. Environment

We recognise that a sustainable future is important to the long-term success of our business. Where operationally and economically achievable, we seek to engage with new technologies, use alternative fuels, source environmentally responsible products, reduce and recycle waste, and improve energy efficiency to reduce the environmental impact of our operations. We accept that climate change is a global issue and recognise that our influence extends to our suppliers and customers. Where practicable, we encourage responsible practices throughout our supply chains and seek to offer equipment that supports a reduced environmental footprint across its life cycle, from manufacture through to end-of-service-life (EOSL) disposal.

We work towards these commitments by:

- Identifying, and eliminating or mitigating so far as reasonably practicable, environmental impacts in the areas in which we operate;
- Complying with applicable environmental legislation, standards, codes of practice and relevant industry practice;
- Maintaining a structured and documented environmental management approach, and improving it over time as our systems and data capability develop;
- Establishing environmental objectives and targets where appropriate, supported by relevant performance indicators;
- Promptly reporting environmental risks and incidents and applying corrective actions to prevent recurrence;
- Considering environmental criteria within our procurement processes;
- Consulting with our people, contractors and relevant stakeholders on environmental matters;
- Transitioning our rental fleet towards electrification, where practicable, and supporting customers who wish to do the same;
- Optimising equipment location and logistics (including "direct to customer" processes) to minimise transportation impacts;
- Working to reduce emissions associated with business-related travel; and
- Identifying further opportunities to reduce consumption of resources, energy and waste.

Climate-related financial disclosure. Adaptalift is a Group 2 reporting entity under the climate-related financial disclosure requirements of the *Corporations Act 2001* (Cth) and the Australian Sustainability Reporting Standards (AASB S2).

Adaptalift will:

- Prepare and lodge its annual sustainability report in accordance with AASB S2, addressing climate-related governance, strategy, risk management, and metrics and targets;
- Measure and disclose its greenhouse gas emissions in accordance with the phased requirements of the standard, beginning with Scope 1 and Scope 2 emissions;
- Maintain Board and executive oversight of climate-related risks and opportunities as part of our enterprise risk management; and
- Develop and maintain the data, controls and scenario-analysis capabilities needed to support accurate and reliable disclosure.

Adaptalift will meet these obligations in a manner proportionate to its circumstances and consistent with the phasing and any transitional relief available under the legislation.

5. Social

Adaptalift's inclusive and family-oriented culture supports our people to meet their work, family and wellbeing needs. We believe our people are our most valued resource, and that everyone deserves the opportunity to contribute to our success through their own personal and professional development. Our values encourage innovation, excellence, authenticity, passion and safety, and reflect our commitment to acting with integrity, fairness and respect, and to maintaining healthy and safe workplaces.

We work towards these commitments by:

- Complying with the *Fair Work Act 2009* (Cth), applicable modern awards and enterprise agreements, and reviewing our arrangements in line with legislative change and relevant industry practice;
- Providing employment conditions that, in relevant enterprise agreements, exceed the equivalent award minimums;
- Providing a safe and healthy workplace and supporting employee satisfaction through appropriate resources, flexible working arrangements and employee benefits;
- Striving for diversity and inclusion across all levels of our workforce, and providing equal opportunity and protection against discrimination, bullying and harassment;
- Reporting to the Workplace Gender Equality Agency (WGEA) as required;
- Promoting a healthy work-life balance;
- Maintaining and complying with applicable sponsorship and overseas employment obligations relevant to our workforce arrangements;
- Maintaining and continually improving our Work Health and Safety Management System in accordance with AS/NZS ISO 45001;
- Promoting safe behaviours and addressing unacceptable behaviours through honest and open engagement;
- Preparing our people for success through information, instruction, training, supervision and support;
- Providing wellbeing initiatives and support services; and
- Seeking to understand our customers' needs and experiences to continually improve our products and services.

Modern slavery and labour rights. Adaptalift is a reporting entity under the *Modern Slavery Act 2018* (Cth) and publishes an annual Modern Slavery Statement. Adaptalift considers the risk of modern slavery in its direct Australian employee workforce to be lower than in its supply chains, and continues to develop its approach to identifying, assessing and addressing modern slavery risks in its operations and supply chains.

6. Governance

We believe that good corporate governance is fundamental to the sustainable and ethical operation of our business. Supported by our internal Legal Counsel and relevant subject matter experts, Adaptalift sets its policies to comply, at a minimum, with the laws applicable to the areas in which we operate, including those relating to financial reporting, taxation, work health and safety, employment, human rights and environmental management.

Facilitated by our Executive Risk & Audit Committee and overseen by our family-owned Board, our approach to enterprise-wide risk management enables us to monitor and respond to existing and emerging social, political, legal, financial, market, climate and regional risks that may affect our objectives. Adaptalift maintains executive and Board-level oversight of material risks, including ESG and climate-related risks, through its established risk and audit governance arrangements. As a Group 2 entity preparing for its first mandatory climate-related financial disclosure in FY2026/27, the Board will maintain oversight of climate-related risks and opportunities, and of the governance and reporting processes required to support disclosure under AASB S2.

We aim to maintain integrity and transparency across our operations. Our internal assurance program provides for regular audits to verify key processes and to respond to instances of non-conformance. Adaptalift's financial position is independently audited, and statutory reports are lodged with the Australian Securities and Investments Commission (ASIC) as required.

We work towards these commitments by:

- Complying with applicable legislation, standards, codes of practice and relevant industry practice;
- Maintaining a structured and documented risk management approach, and improving it over time;
- Maintaining a structured and documented quality management approach, and improving it over time;
- Maintaining and continually improving our Work Health and Safety Management System in accordance with AS/NZS ISO 45001;
- Working with key stakeholders and suppliers to support ethical business practices, including in relation to modern slavery, anti-bribery and anti-corruption;
- Maintaining Board-level oversight of material risks, including climate-related and sustainability-related risks;
- Establishing assurance objectives and targets where appropriate, supported by relevant performance indicators;
- Maintaining whistleblower and grievance channels that enable concerns to be raised and appropriately addressed; and
- Promptly reporting risks and non-conformances and applying corrective actions to prevent recurrence.

7. Governance of this Policy, review and disclaimer

This Policy is owned by the Head of Operational Risk in consultation with Legal Counsel and is approved by the Board. It will be reviewed at least every two years, or earlier where there is a material change in Adaptalift's operations, risk profile or legal obligations (including changes to ASRS applicability or other sustainability-related legislation).

Nothing in this Policy is intended to create legally binding obligations beyond those imposed by applicable law, or to give rise to representations or warranties. Forward-looking statements, aims and intentions in this Policy are subject to change and are pursued on a reasonable and practicable basis in light of Adaptalift's commercial circumstances.

To request a change to this Policy or any related document, contact the Head of Operational Risk. Changes will be communicated as they occur.

8. Reference documents

- Code of Conduct
- Privacy Policy
- Discrimination, Bullying and Harassment Policy / Respectful Workplace Behaviours Policy
- Diversity and Inclusion Policy
- Employment – Recruitment and Selection Policy
- Whistleblower Policy
- Modern Slavery Statement
- Anti-Bribery and Corruption Policy
- Workplace Health, Safety Policy
- Management of Change (MoC) Procedure
- Supplier and Contractor Management Procedure

9. Approval

This Statement was approved by the Board of Adapt-A-Lift Group Pty Ltd ACN 605 149 568 in its capacity as the principal governing body of Adaptalift on 1 September 2026.
Signed:

Lindsay Whiffen
Chief Executive Officer and Director
Adapt-A-Lift Group Pty Ltd
Date: 1 September 2026