

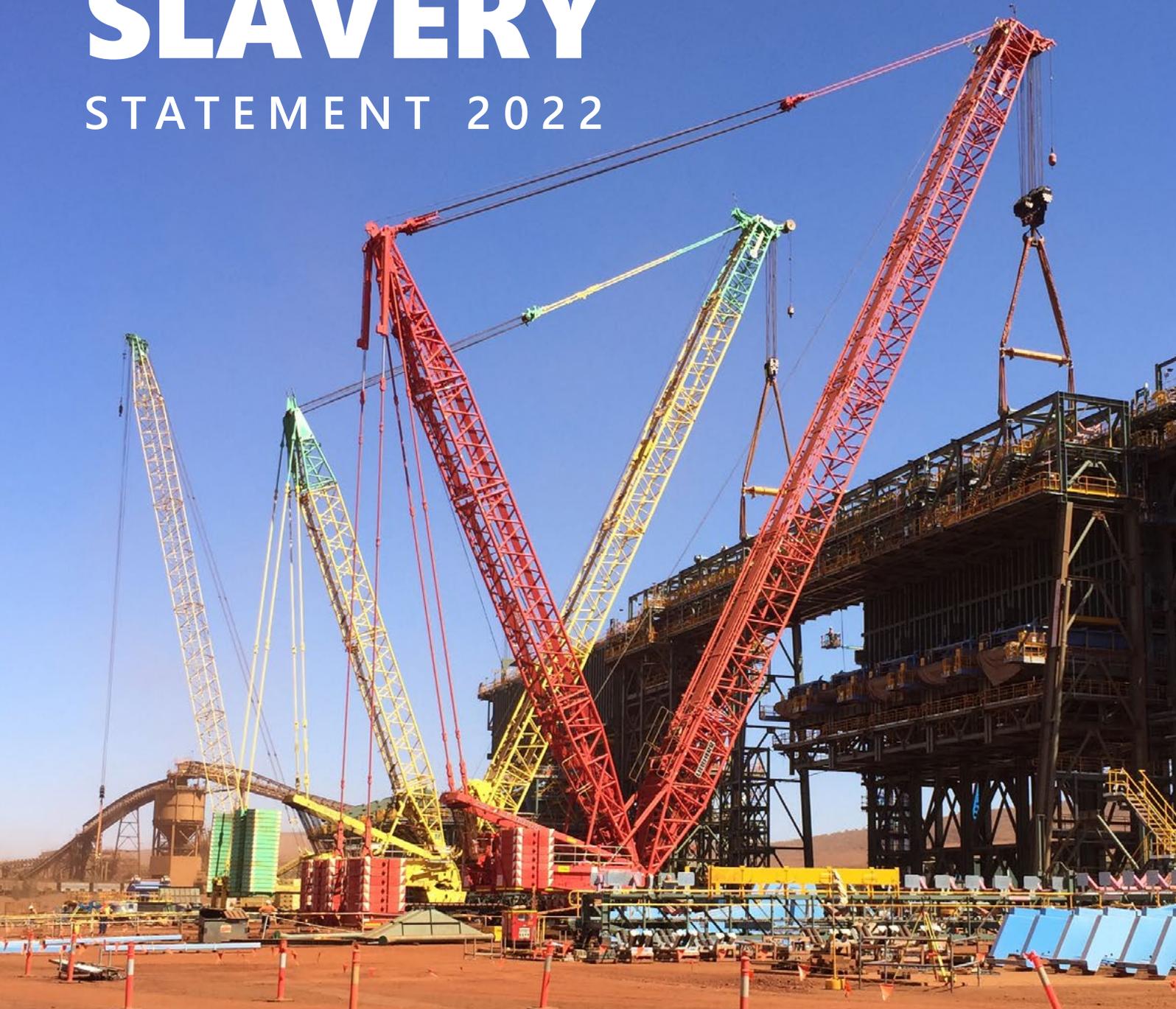
TUTT BRYANT GROUP LIMITED

A Member of Tat Hong Holdings Ltd



MODERN SLAVERY

STATEMENT 2022



EQUIPMENT SALES

HIRE

HEAVY LIFT & SHIFT

UNDER THE ONE HOOK

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Introduction

Tutt Bryant Group Limited and its consolidated entities (“Tutt Bryant”) are committed to the eradication of Modern Slavery within its operations and throughout its supply chains. At Tutt Bryant, we are dedicated to upholding human rights. We do not condone any breach of human rights that may impact our business and the industries in which we operate and understand the importance of working responsibly and ethically whilst also upholding our core company values “The Tutt Bryant Way”.

At Tutt Bryant, each of our consolidated entities work together in their journey to understanding how we can best address Modern Slavery concerns. We are committed to adhering to the *Modern Slavery Act 2018* (Cth) (the “Act”) statutory requirements as well as continuing to look toward international best practice concepts and models.

This statement builds on what we achieved last year and highlights the steps we have taken this financial year to 31 March 2022. While the Covid-19 pandemic’s effects continue to endure, Tutt Bryant remains committed to ensuring the same principles and high standards are maintained in this key area.

Our Approach

This Modern Slavery Statement is made on behalf of Tutt Bryant pursuant to the Act and sets out our approach to address modern slavery risks, as well as any suspected human rights breaches, relating to our business operations and supply chains.

This is Tutt Bryant’s ‘Third Modern Slavery Statement’, and it describes our ongoing commitment to the requirements of the Act and associated regulations for our financial year ending 31 March 2022.

Our priorities throughout 2021/2022 reporting period

- **Process Evaluation**

- » During the reporting period we assessed the value of engaging an external provider to conduct a review of the systems and processes we have implemented to address Modern Slavery concerns and risks.

- **Workforce Education**

- » Implementation of our internal training program on Modern Slavery Awareness commenced for all current employees during the reporting period.

- **Supplier Engagement Plan**

- » Finalise the development of our Supplier Questionnaire and commence implementation process.
- » Continue to explore alternative ways to engage with our stakeholders where the Covid-19 pandemic has impacted traditional methods.

- **Data Capture**

- » Automate some of our data capture processes to ensure we receive more information about Modern Slavery risks in our supply chain.

- **Continuous Improvement**

- » Review industry practices for Modern Slavery matters.
- » Implement best practices from “*Australian Border Force Modern Slavery Act Information Sheet: Coronavirus*” as a benchmarking source to reduce the risk of vulnerable workers and supply chains becoming exposed to modern slavery.

Progress against our 2021/2022 priorities

The persistence of the Covid-19 pandemic continues to adversely affect progress towards some of our objectives. During the reporting period, we maintained a working group to monitor our Modern Slavery commitments to ensure, where possible, project momentum was retained.

Process Evaluation

As part of our commitment to building capability and knowledge in how we can best address Modern Slavery concerns and risks, we have assessed the value of engaging an external provider to review our systems and processes. During the reporting period we concluded that an external review of our program once every three years is a reasonable timeframe. This will allow us to maintain momentum and adequately achieve program milestones.

Workforce Education

An internal training program was delivered during the reporting period. This program explains what Modern Slavery is, the risks within our Supply Chains and how to identify potential human rights breaches. It concludes by educating our workforce and management on how to report any suspected breaches in these areas. The overall workforce participation rate was 55% with a completion rate of 49% during the reporting period.

Supplier Engagement

During the reporting period we finalised our Supplier Questionnaire which is an instrument used to identify Modern Slavery risks in our supplier network. Additionally, we obtained centralised supplier information to ensure correct priority can be assigned for Supplier data gathering purposes. We continue to consider how we can ensure adequate supplier engagement during the Covid-19 pandemic and its ongoing effects on industry and supply chains. We acknowledge continued limitations, such as being unable to physically attend industry or site visit events, which impedes traditional visual scrutiny of supplier practices, this however is beginning to ease with overseas travel restrictions easing allowing for overseas supplier visits / inspections.

Data Capture

We continue to monitor our group and its supplier networks for any high-risk areas that may require immediate action. Additionally, we have looked further into our Supplier network to assess any lower risk categories that we could identify in our efforts to ensure Modern Slavery risks are eradicated throughout our business partnerships.

During the reporting period we developed an automated format for capturing initial supplier screening information through our Supplier Questionnaire. This process will be implemented throughout the next reporting cycle.

Continuous Improvement

We continue to evaluate our approach to Modern Slavery against others to identify any gaps in our analysis of the matters at hand. Our modern slavery working group regularly reviews the Modern Slavery Statements of our competitors and industry leaders to gain insight into areas we can seek to improve. We have also used the *"Australian Border Force Modern Slavery Act Information Sheet: Coronavirus"* as a benchmarking source of how to improve our approach to Modern Slavery.

Our Structure, Operations and Supply Chain

Structure

Tutt Bryant Group Limited (ACN 009 242 675 / ABN 89 009 242 675) is an Australian public unlisted company limited by shares with its registered head office in Sydney Olympic Park, New South Wales. It is an industrial services organisation providing sales, hire, parts, service, and engineering solutions to Australia's construction, mining, engineering and trades sectors. Tutt Bryant Group Limited is 100% owned by Singapore-based Tat Hong Holdings Ltd, a privately held company ranked as one of the largest crane owners/operators in the world.

Our Operations

Tutt Bryant Equipment is the organisation's Equipment Sales & After-Sales Support (Parts & Service) division. As a national multi-franchised distributor of earthmoving and construction equipment, Tutt Bryant Equipment exclusively represents several global brands in Australia. In addition to capital equipment sales, Tutt Bryant Equipment supports its customers in providing spare parts, consumables, mechanical service, repairs and other support functions. Tutt Bryant Equipment has expanded its activities with the acquisition of 600 Cranes, the national distributor of Fassi knuckle boom truck loading and marine cranes, Marrel hooklifts, Jekko mini crawler cranes and Idrobenne grapples and clamshell buckets for cranes. 600 Cranes offers a full range of sales and servicing workshops with accredited agents around Australia. Services also include remote and offshore servicing, maintenance and inspections.

Tutt Bryant Hire is the organisation's General Equipment Hire division. With a comprehensive range of equipment for hire from 19 geographically diverse locations, Tutt Bryant Hire services customers in Australia's construction, mining, engineering and trades sectors. The general equipment range includes earthmoving, excavators, compaction, access, materials handling, traffic management, air compressors, lighting & power, welding, site accommodation, pumps and others.

Tutt Bryant Heavy Lift & Shift is the organisation's Cranes, Heavy Lifting & Specialised Transport division. Operating one of the largest crane fleets in Australia, Tutt Bryant Heavy Lift & Shift provides both wet (with operator) and dry (without operator) crane hire, as well as engineered turnkey solutions to meet all heavy lifting and transportation needs of major projects. The conventional crane fleet is supplemented by specialised lift & shift assets, such as modular transporters (including self-propelled units), hydraulic jacking systems and other skating and skidding equipment.

Tutt Bryant Finance is a 50% joint venture company providing complementary financing options to customers.

Cranecorp Tutt Bryant Joint Venture aims to create a single 'all-in-one' source of supply for cranes, heavy lifting, heavy transportation and alternative lift & shift solutions. The Joint Venture brings together the unique capabilities of two specialists, offering: the combined experience, fleet composition and geographical locations across Western Australia and beyond. The Cranecorp Tutt Bryant Joint Venture offers customers a broad range of services, equipment and innovative solutions including design and engineering; project planning and project management; turnkey heavy lifting and transportation; equipment hire, both wet and dry; and specialist labour hire.

Garlbagu Tutt Bryant Joint Venture - Established in June 2021 and operating from the heart of traditional Ngarluma and Yindjibarndi lands in Karratha and Roebourne, the Garlbagu Tutt Bryant Joint Venture aims to support customers and projects with general equipment and plant hire services. Through these business and social activities, the Joint Venture's purpose is to create genuine outcomes for Traditional Owners and long-term sustainable change under the motto "driving social change through business". Deploying quality well-maintained plant and equipment for hire that is backed by locally based customer service and technical support, the Joint Venture is committed to being the supplier of choice in the Pilbara region. In addition to plant and equipment hire, the Joint Venture also offers equipment servicing and transportation services, while aiming to provide training pathways and employment opportunities to First Nations people in the local community.

Our Supply Chain

Our supplier relationships have remained stable throughout the reporting period and are generally unchanged from our last statement. We continue to engage with organisations in developed economies with minimal engagement in emerging ones. We have had some procurement from suppliers in competitive market countries such as China, however this remains to only be on a nominal basis. When measured by value, most of our payments are made to suppliers in Australia, Japan, Finland, Italy, the United States of America and, our parent company in Singapore.

We often operate in remote locations throughout Australia with many contracts supporting local procurement policies to strengthen local communities. This activity has strengthened during the reporting period with our recent Garlbagu Tutt Bryant Joint Venture. The goods and services we purchase cover the full lifecycle of heavy machinery and transport services. Our largest spend categories are in heavy equipment, fuel, spare parts and materials, energy and logistics, notwithstanding our largest cost groupwide being employment/wages and employee development.

As a member of Tat Hong Holdings Ltd ("Tat Hong Holdings"), we adhere to its **'Group Sanctions Compliance Policy'** and the **'Sanctions Compliance Principles, Procedures and Guidelines.'** Our compliance with sanctions laws and regulations that are administered, enacted and enforced by the United Nations Security Council, the European Union, the United Kingdom and the United States of America prohibit Tutt Bryant from participating in any transactions or business relationships/dealings with prohibited countries or persons. The total trading ban and prohibited countries currently include: The Democratic Republic of Korea (North Korea), Cuba, Iran, Syria, Russia, and Venezuela. We also take extra caution with the movement of equipment between Australia and Myanmar. As a reference, we utilise the Australian Department of Foreign Affairs and Trade's published list of Sanctioned Companies and Individuals to scrutinise our customer and supplier records for compliance.

Risk Assessment and Mitigation

During the reporting period, we included assessment of potential low risk areas in our due diligence processes. In addition, we continue to monitor the areas considered high risk to ensure that any perceived or identified occurrence of Modern Slavery risks, requiring immediate attention and mitigation, were addressed immediately, through the appropriate channels.

When assessing risk, we consider various factors including: the sector, industry, types of products and services, spend per annum and geographic location. Additionally, we have utilised public resources, such as the Modern Slavery Statements Register, to enhance our understanding and aid us in improving our own approach.

Tutt Bryant's view of Modern Slavery risks within our direct business operations remains low. However, we continue to recognise that we could potentially be indirectly exposed to Modern Slavery through our supply chains and customers.

Due Diligence and Remediation Processes

Due Diligence

Tutt Bryant takes a risk-based approach to due diligence, which considers factors such as the goods or services, country of origin, vendor and spend level with our suppliers. During the reporting period, we included analysis from tier one suppliers to lower tiers. We recognise the importance of understanding risks in our supply chains beyond our regular business partners with whom we have direct contractual relationships.

Due to the ongoing Covid-19 pandemic, our analysis continues to be primarily based on information obtained through public sources. As the pandemic persists in providing impediment to on-the-ground identification of risks where lockdowns are in place, we have engaged with Suppliers through online facilities. However, where a high-risk supplier is identified, we remain committed to engaging directly with that supplier, however possible, for more detailed information. Direct information requests include enquiries about the supplier's labour policies as well as asking about specific concerns, such as whether and why the supplier retains the workers' identification documents or limits its employees' freedoms or human rights.

Remediation Processes

During the reporting period we began implementation of our workforce engagement plan which includes our Internal Modern Slavery Awareness Training Program. This program aims to build our employees' awareness of how best to engage with Tutt Bryant's risk management processes and how they appreciate and recognise what constitutes a Modern Slavery incident. We also finalised our External Supplier Questionnaire which will be implemented throughout the next reporting period and aims to improve our information gathering abilities. In addition, we have looked at how to automate these systems to ensure the processes we put in place will be completed in a timely and effective manner. Our intention for these projects is to provide us with opportunities to improve our response to perceived or identified instances of Modern Slavery and human rights risks.

Both our internal training program and external questionnaire contain information on grievance mechanisms so that systemic issues can be highlighted, serving to strengthen and inform our Modern Slavery and human rights due diligence. Our Supplier Questionnaire in particular includes direct engagement with customers and other stakeholders. We are committed to taking steps to understand the issues at hand and take appropriate action, including where necessary, referring matters to the appropriate authorities. We have continued to review our reporting mechanisms throughout the reporting period so that they adhere to external escalation points appropriately to ensure compliance.

To date, we have not identified any instances of Modern Slavery associated with our operations or in relation to our supply chains.

Measuring Effectiveness

Our grievance mechanisms are one way we can track our performance against our risk mitigation goals. No Modern Slavery related complaints were received during the reporting period from 1 April 2021 to 31 March 2022.

This reporting period was the implementation year for our Internal Modern Slavery Awareness Training Program. The participation rate for the program by 31 March 2022 was 55% of the eligible workforce with a completion rate of 49%. During the next reporting period we aim to increase participation and awareness to ensure high workforce engagement is reached.

Additional actions we engaged with throughout the reporting period include: senior management annually reviewing our mitigation actions and responses to Modern Slavery concerns, site visits to suppliers where possible, finalisation of our external supplier questionnaire, maintain pre-qualification checks for suppliers to include a Modern Slavery assessment, and embedding specific auditing rights and/or Modern Slavery risk mitigation expectations into new contracts with suppliers. The executive management team, in consultation with the modern slavery working group, also assessed the value of an external review of our Modern Slavery Risk Program to ensure our continuous improvement objectives are being met.

Stakeholder Engagement and Consultation

At Tutt Bryant, we understand the value of engaging with our business partners and relevant government agencies to help us identify and manage Modern Slavery risks. A coordinated approach in addressing such risks in our supply chains is the only way to effectively address any concerns.

Unfortunately, throughout the reporting period, the Covid-19 pandemic continued to impact our ability to effectively identify Modern Slavery risks and incidents that may have been found through in-person activities, such as site visits and vendor meetings. However, these took place wherever possible to ensure the impacts of the pandemic were minimised or an online alternative was arranged.

While reporting is conducted by the head entity, each of the consolidated entities is engaged in the discovery process of exploring operational and supply chain exposures. Furthermore, consultation has been held across all consolidated entities for clarification and forward planning of future Modern Slavery, human rights and sanctions initiatives.

During the reporting period Tutt Bryant observed an increase in requests to complete Modern Slavery Questionnaires from customers and suppliers. This marked increase in Modern Slavery activity assisted us in ensuring our own processes are adequately designed to capture essential data.

Looking Forward

Modern Slavery risk management requires continuous commitment and ongoing collaboration both from within our business and through multi-stakeholder dialogue. We are committed to continuing our efforts to collaborate with our internal and external stakeholders to prevent and address human rights risks, including Modern Slavery, as well as encourage continuous improvement.

Over the next reporting period we aim to focus on:

- **Supplier Engagement**

- » Implementation of our External Supplier Questionnaire will occur throughout the next reporting period.
- » Data review to assess supplier engagement and how effective our automated data processes are will occur throughout the year.
- » We will continue to consult with our suppliers and workforce to identify gaps in knowledge and develop ways to improve identified deficiencies.

- **Measuring Effectiveness**

- » We will use the next reporting period to assess the effectiveness of the systems and processes we have implemented. This includes the External Supplier Questionnaire and our Internal Modern Slavery Awareness Training Program.
- » An increase in participation rate of our Internal Modern Slavery Awareness Training Program will be sought and we will assess barriers to participation within the workforce.
- » An assessment of uptake of the External Supplier Questionnaire will occur after implementation.
- » We will continue to explore alternative ways to engage with our stakeholders where the Covid-19 pandemic has impacted traditional methods

- **Stakeholder Collaboration**

- » We will use this next reporting period to work with our parent company, Tat Hong Holdings, in the development of the Global Sustainability Committee which encompasses the areas of Sanctions and Modern Slavery.

This will increase the participation and understanding across the wider group of the meaning of Modern Slavery and the implementation of appropriate plans and actions moving forward across our supply chains and areas of influence on an international stage. We continue to improve our approach towards mitigating risks of Modern Slavery throughout our business and remain committed to looking for new and better ways to eradicate any risk of Modern Slavery in our business dealings. We understand the importance of engaging with others to reach overall improvement and impact on the global eradication of Modern Slavery and human rights abuses.

This Modern Slavery Statement is provided on behalf of Tutt Bryant Group Limited and its consolidated entities and is approved by the Tutt Bryant Group Limited Board of Directors.



Chen Wei Ng
Managing Director
Tutt Bryant Group Limited

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