

SIXTH JOINT MODERN SLAVERY STATEMENT

Sime Darby Industrial Australia Pty Ltd and
Hastings Deering (Australia) Limited



Sixth Joint Modern Slavery Statement of Sime Darby Industrial Australia Pty Ltd and Hastings Deering (Australia) Limited

This is the sixth joint Modern Slavery Statement under section 14 of the *Modern Slavery Act 2018* (Cth) (**the Act**) made in respect of Sime Darby Industrial Australia Pty Ltd (ACN 153 652 594) (**SDIA**), and its wholly owned subsidiary Hastings Deering (Australia) Limited (**Hastings Deering**). Both SDIA and Hastings Deering are reporting entities under the Act.

Under SDIA, there is a group of directly and indirectly owned subsidiary entities that are internally collectively referred to as the *Industrial Solutions* businesses (**IS**). These entities are listed in the Schedule to this Modern Slavery Statement. For a second year, the IS suppliers have been included in the modern slavery questionnaire reporting.

For the first time, Salmon Earthmoving Holdings Pty Ltd (**Salmon**), an indirectly wholly owned subsidiary of SDIA, has been included as part of the supplier questionnaire. The expansion of our supply chain mapping this year to include Salmon's suppliers, and for a second year include IS' suppliers, demonstrates our commitment to identifying and managing modern slavery risks in our supply chains.

We provide a summary of the results of the Hastings Deering, IS and Salmon modern slavery questionnaires in this Modern Slavery Statement.

Our Corporate Values are "Care for All, Act with Integrity and Win Together". We recognise that within these values lies a primary commitment to do business in an ethical manner and to deliver results that benefit our people, our communities and our customers. We seek to partner with suppliers that respect the importance and protection of human rights, and that demonstrate a commitment to improve compliance in this area.

This year, we aimed to educate our employees on modern slavery so that they are equipped to identify modern slavery risks and take the necessary actions to mitigate such risks. In particular, we focussed on training employees in the human resources and recruitment space, to ensure they are aware of modern slavery risks and able to identify behaviour that may indicate modern slavery practices occurring in their specific area of work.

This joint Modern Slavery Statement has been approved by the Board of SDIA on 10 December 2025 and I have been authorised to sign this statement on their behalf.



Dean Mehmet (Dec 15, 2025 17:27:50 GMT+10)

Dean Mehmet

Managing Director – Sime Industrial

About our business

For the purpose of this Modern Slavery Statement, references to “the **Group**” collectively refers to:

- a. SDIA;
- b. Hastings Deering;
- c. Salmon; and
- d. IS.

SDIA Structure and Operations

SDIA is a wholly owned subsidiary of Sime Darby Industrial Holdings Sdn Bhd, the industrial division of Malaysian investment holding company, Sime Darby Berhad. The principal activities of the industrial division are the sale, rental and servicing of Caterpillar products and delivering industrial solutions for customers in the mining, construction, power generation, forestry, marine, oil and gas sectors. Sime Industrial has had a partnership with Caterpillar for over 90 years and is ranked among the world’s largest Caterpillar dealer groups.

In terms of SDIA’s Australian operations, as at 30 June 2025 the entities participating in the activities outlined in this statement are the Caterpillar dealership in Australia, Hastings Deering, as well as other allied operational entities including the IS entities (mining restoration software, hard chroming, mechanical services and labour hire businesses) and Salmon (rental of Caterpillar and other machinery).

Hastings Deering Structure and Operations

Hastings Deering is a wholly owned subsidiary of SDIA and is headquartered in Brisbane, Queensland. Hastings Deering has 23 business service centres throughout Queensland and the Northern Territory in Australia, as well as Papua New Guinea, Solomon Islands and New Caledonia. Hastings Deering employs over 3,400 people and sells, rents, services and supports the complete range of Caterpillar heavy equipment used in mining, general construction, civil transport and construction, power systems, government, primary industries and marine sectors. Hastings Deering has a wide range of new, used, remanufactured or maintenance parts solutions; stocking over 232,000 lines of Caterpillar parts inventories.

IS Structure and Operations

IS is headquartered in Brisbane, Queensland and encompasses Haynes Mechanical Pty Ltd, TFP Engineering Pty Ltd, Austchrome Pty Ltd, Decoda Digital Services Pty Ltd and HMG Hardchrome Pty Ltd. IS employs 528 people as at 30 June 2025, and provides various services and technological solutions to the mining, general construction, civil transport and construction, power systems, government, primary industries and marine sectors.

Salmon Earthmoving and Operations

Salmon hires and supports a complete range of Caterpillar and other machinery used in the resource and construction sectors. Salmon is one of Australia’s largest heavy equipment rental companies, with support branches across Queensland.

Governance Management

The Board of SDIA is responsible for overseeing the governance, management and strategic direction of each entity. For compliance assurance related matters, the Group reports to Sime Darby Group Risk and Compliance, although Management of IS, Salmon and Hastings Deering remain primarily responsible for managing compliance and corporate governance and implementing any required internal controls, which include controls to prevent modern slavery risks. The Board of SDIA and Hastings Deering respectively will manage compliance of this Modern Slavery Statement and future modern slavery statements published, pursuant to section 16(2)(b) of the Act.

Risks of Modern Slavery in Operations

The Group views its own operations to be a very low risk of causing or contributing to modern slavery, based on the data collected from suppliers as well as its internal frameworks, policies and governance practices in place.

In terms of internal personnel risk, the recruitment practices of the Group are managed by an experienced team of internal recruitment partners with applicants being provided with sufficient information about the type of work they are undertaking and the working conditions. Examples of such practices include the following:

- a. where staff are provided with accommodation to work at customer sites, the working and living arrangements are internally assessed and approved to be clean and appropriate before any personnel is allocated to work;
- b. where employees are required to relocate for operational requirements, the employee is actively engaged in sourcing housing and accommodation to ensure it is acceptable;
- c. regular reviews are undertaken of remuneration and entitlements to ensure compliance with legislation and any applicable enterprise agreement or award; and
- d. prior to commencing employment, IS, Salmon and Hastings Deering undertake a review of the potential employee's working rights in Australia (including visa checks) as well as conducting pre-employment medical checks.

Hastings Deering, Salmon and IS have dedicated employee relations and HR services functions that undertakes this work and any investigations of employment related claims.

Other relevant elements included in the Group's policy framework which support the importance of the ethical treatment and conduct of employees in its operations include, but are not limited to:

- an Employee Code of Business Conduct;
- Equal Employment Opportunity Policy;
- New Respect at Work compliance policies and processes;
- Harassment and bullying policies, and grievance handling mechanisms;
- Whistleblower policy;
- Sime Darby Human Rights Charter;
- Sime Darby Responsible Sourcing Policy; and
- a Flexibility and Inclusion Program with five focus areas of culture, gender, abilities, generation and LGBT.

The Group is continuing to evaluate the effectiveness of its internal policies to ensure that there are safeguards in place to protect against modern slavery. On a quarterly basis, Hastings Deering, IS and Salmon are required to internally report on their compliance with the Act. The reporting requires Hastings Deering, Salmon and IS entities to:

- a. confirm that there is compliance with local human rights regulatory requirements (e.g. responsible sourcing, modern slavery) in terms of recruitment/vendor¹ selection; and
- b. advise whether there have been any incidences where regulators have approached for non-compliances.

¹ Throughout this joint Modern Slavery Statement, the terms "supplier" and "vendor" are used interchangeably.

Risks of Modern Slavery in Supply Chain and response practices

In the 2024-2025 Financial Year:

- a. Hastings Deering had a base of 1645 active suppliers registered; and
- b. IS had a base of 646 active suppliers registered.

The Group does not consider that it has a high risk of directly causing or contributing 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. As some of its vendors are located outside of Australia, the Group acknowledges there are challenges associated with direct and frequent observation of supplier activities. To assist in mitigating the risk associated with suppliers located in high-risk areas outside of Australia, the Hastings Deering Procurement Team assess relevant factors to address any concerns relating to modern slavery risks within the relevant industry of the supplier.

The Group has a robust approach to the onboarding of vendors which requires positive compliance with documented Sime Darby Group Procurement Policies and Authorities. Part of this requirement includes a pre-qualification and registration exercise which assesses the background, technical expertise and financial capability of proposed vendors. In addition, vendors must provide an undertaking to abide by the Sime Darby Code of Business Conduct (**Code**) via the signing of a Vendor Letter of Declaration (**VLOD**). The Code outlines the ethical business practice expectations of Sime Darby Berhad, including that vendors comply with all laws related to anti-slavery and prohibited business practices. All active vendors undertake a re-registration process every 2 years which requires the VLOD to be re-signed and returned. During the 2024-2025 Financial Year, Hastings Deering onboarded 362 new vendors and completed re-registration for 356 vendors. IS is in the process of implementing a VLOD re-registration process, which is expected to be implemented within the 2025/26 financial year. Further, Salmon is in the process of being integrated into the Group's systems and procedures since being acquired by Sime Darby. Over the next year, the Sime Darby Industrial Australia Pty Ltd legal team will support Salmon in incorporating the VLOD and VLOD re-registration process into its business.

As part of its sourcing approach, Hastings Deering's Request for Tender (**RFT**) process requires vendors to sign the VLOD prior to participation. The RFT also includes a series of questions and seeks supporting documentation from vendors across numerous focus areas including Corporate Social Responsibility where vendors are asked to provide a response to management of modern slavery risks in their supply chains. Responses to questions are reviewed thoroughly and form the basis for evaluation criteria which are used to inform decisions on award of business. Supply agreements and Purchase Order Terms & Conditions also include provisions for ensuring compliance with obligations under modern slavery laws.

The Group's approach to vendor onboarding and sourcing, supported by Modern Slavery training and ongoing business engagement, form key foundations to detect and address modern slavery risks across the supply chain.

Consultation with entities owned or controlled by the SDIA Group

There is a commonality of directors across each of the Group and the subsidiary entities, as well as regular interaction between senior leadership teams.

The procurement process outlined above pertaining to onboarding and execution of the VLOD and compliance with the Code is required across the Group.

Supply Chain review

Supplier Questionnaire

The Group continued the use of a self-assessment questionnaire using an online Microsoft Form (**Questionnaire**). This enabled the Questionnaire to easily be distributed to the selected registered suppliers of Hastings Deering, Salmon and IS respectively.

As part of our ongoing commitment to identifying modern slavery risks in our supply chains, we conducted a review and update of the assessment logic that is applied to the Questionnaire results to rank each supplier's risk rating. This review resulted in the following changes to the assessment logic being implemented:

- a. expanding the scope of countries listed as high-risk for modern slavery to reflect those countries listed as high-risk in the Global Slavery Index;
- b. expanding the scope of high-risk product/services to include "manufacturing";
- c. including prison workers as part of the high-risk workforce risk, and season workers as a medium-risk workforce risk; and
- d. updating the governance practices assessment, so that any suppliers who do not have a whistleblowing policy or other grievance handling mechanism in place are identified as being at greater risk of modern slavery practices.

As per previous years, the key areas covered by the Questionnaire included elements of:

- geography;
- industry sector;
- products or services provided;
- spend level;
- workforce mix;
- turnover; and
- workforce practices and corporate governance practices in place.

Hastings Deering Supplier Questionnaire Results

The Questionnaire was issued to 231 key Hastings Deering supplier entities this year.

At the time of publishing this Modern Slavery Statement, the response rate of Hastings Deering's suppliers to the Questionnaire was over 63%. This is a significant improvement on responses from the previous year (with a response rate of 41%) and Hastings Deering endeavours to continue to improve the response rate in FY2025/26.

There was a higher level of high-risk and medium-risk suppliers identified in comparison to the previous reporting period (9.52% vs 3.66%). Upon review, it appears that the amendments to the assessment logic have likely resulted in more suppliers being captured in the high-risk category. For example, there were multiple suppliers that previously were identified as low or medium risk suppliers, however now against the amended assessment logic, have been flagged as high-risk. Hastings Deering considers this to be an overall valuable outcome, as it means that we are more comprehensively reviewing the modern slavery risk in our supply chain.

Notably, of the high-risk suppliers identified (14 out of 147), all responded with:

- a. engaging major suppliers for goods and services that are located in high-risk countries (i.e. Eritrea, Mauritania, Saudi Arabia, Türkiye, Tajikistan, United Arab Emirates, Kuwait, India, China, Pakistan, North Korea, Nigeria, Iran, Indonesia, Democratic Republic of Congo, Russia, Philippines, Brazil, Uzbekistan, Afghanistan, and Myanmar);
- b. operating in a high-risk industry sector (i.e. either mining, textiles, cleaning, manufacturing, electronics, or agriculture) or a high-risk product/service category (i.e. labour/recruitment, services, raw materials, PPE or merchandise); and
- c. having inadequate governance practices in place to combat modern slavery.

Hastings Deering will be reviewing each supplier flagged as high-risk, and working with these suppliers to understand what their remediation plan is for improvement or implementation of policies if

required.

The Hastings Deering Questionnaire also highlighted that the majority of Hastings Deering's suppliers:

- a. operate only in Australia and New Zealand, which are both low risk jurisdictions for modern slavery according to the Walk Free Foundation Global Slavery Index, and low risk for corruption according to the 2023 Transparency International Corruption Perceptions Index; and
- b. do not use suppliers that operated in countries identified as high risk for modern slavery.

Overall, Hastings Deering considers the exposure in its supply chain to be limited.

Caterpillar as a Supplier of Hastings Deering

A major part of Hastings Deering's operations and business is its role as a Caterpillar Equipment and Parts Dealer. Caterpillar is a significant supplier in Hastings Deering's supply chain. Caterpillar and its Australian subsidiaries are subject to modern slavery reporting obligations both in Australia and also in other jurisdictions where modern slavery legislation is in force. Caterpillar has outlined its compliance initiatives in its Supplier Code of Conduct and Human Rights Policy and have expressed a strong commitment to respecting human rights.

IS Supplier Questionnaire Results

The Questionnaire was issued to IS suppliers with an annual spend of over AUD50,000, being a total of 164 suppliers.

At the time of publishing this Statement, the response rate to the Questionnaire was 48.17%. This is a substantial increase in the response rate in comparison to the previous reporting period, of which was 29.2%. IS intends to continue to grow the engagement with the Questionnaire by its suppliers, and intends to do that by:

- a. notifying new suppliers during onboarding that an annual modern slavery questionnaire may be issued to them while they are an active supplier; and
- b. notifying existing suppliers during the VLOD execution of the requirement to complete the annual modern slavery questionnaire.

The Questionnaire identified a small number of high-risk suppliers (9 out of the 164). The key causes for these suppliers to be flagged as high-risk were due to the suppliers:

- a. engaging major suppliers for goods and services that are located in high-risk countries;
- b. operating in a high-risk industry sector (i.e. either mining, textiles, cleaning, manufacturing, electronics, or agriculture) or a high-risk product/service category (i.e. labour/recruitment, services, raw materials, PPE or merchandise); and
- c. having inadequate governance practices in place to combat modern slavery.

Based on these results, IS considers the overall exposure in its supply chain to be limited and to be consistent with the industries within which it operates.

Like Hastings Deering, a majority of IS' suppliers:

- (a) operate only in Australia and New Zealand; and
- (b) do not use suppliers that operated in countries identified as high risk for modern slavery.

Salmon Supplier Questionnaire Results

For the first time, the Questionnaire was issued to Salmon's suppliers. The Questionnaire was issued to Salmon's current suppliers for the 2024/25 financial year with a spend of over \$30,000, being a total of 215 suppliers.

At the time of publishing this Statement, the response rate to the Questionnaire by the selected Salmon suppliers was 44.65%. As this was the first time the Questionnaire was issued to Salmon's suppliers, the Group views this engagement rate as overall very positive. Moving forward, Salmon will focus on increasing engagement further with the Questionnaire, with a target of over 50% for the next reporting period.

The Salmon Questionnaire identified 7 high-risk suppliers, 89 medium-risk suppliers and 0 low-risk suppliers. Given that Salmon operates heavily in the resources and construction industries, it is not overly surprising that the majority of its suppliers would be categorised as medium-risk for modern slavery (given the assessment logic applied to the Questionnaire results to rank each supplier's risk uses "industry" as a key identifier of risk level).

Notably the Questionnaire results identified that:

- i. over 88% of Salmon's suppliers operate in Australia and New Zealand only;
- ii. the majority of Salmon's suppliers are not reporting entities under the Act, and as a result may have limited awareness of modern slavery risk in their supply chains. This is of significance given only 7.29% of suppliers confirmed they have fully mapped their supply chains;
- iii. all high-risk suppliers of Salmon engage suppliers located in high-risk countries; and
- iv. all high-risk suppliers of Salmon operate in either a high-risk industry sector (i.e. either mining, textiles, cleaning, manufacturing, electronics, or agriculture) or a high-risk product/service category (i.e. labour/recruitment, services, raw materials, PPE or merchandise).

The Group will notify Salmon's leadership team of high-risk suppliers identified by the Questionnaire results and assist in implementing any necessary actions.

2024/25 Actions taken and effectiveness result

The Group's focus in FY2024/25 was to continue developing modern slavery awareness throughout its business functions, as well as providing employees with the resources and knowledge to identify modern slavery risks.

Specifically, the Group undertook a range of actions throughout the reporting period. The effectiveness of each action is indicated below:

Action	Effectiveness
<p>Complete the case study with a selected supplier and identify any learnings or methods that can be implemented internally to the Group's operations to reduce modern slavery risk.</p>	<p>A desktop case study was conducted of both a competitor company and another Caterpillar dealership to review and analyse their respective approaches to combat modern slavery.</p> <p>This was an overall useful exercise, as it presented initiatives that the Group could implement to further improve upon its own approach to combatting modern slavery. This includes but is not limited to:</p> <ul style="list-style-type: none"> i. establishing a modern slavery committee/working group including representatives from the legal, procurement and tender & contracts teams; ii. establishment of remediation process for high-risk suppliers that do not complete or conform with the Questionnaire; iii. creating a modern slavery policy; and iv. engaging an external third-party whistleblowing reporting hotline for anonymous reporting.
<p>Continue delivering modern slavery training across the businesses</p>	<p>Modern slavery training was presented to the Hastings Deering human resources and recruitment teams.</p> <p>The training was engaging and well received by the attendees and:</p> <ul style="list-style-type: none"> a. explained the reporting requirements to prepare a modern slavery statement; b. outlined the 7 risk matrix criteria; c. discussed the supply chain risk review process; d. identified particular risk areas for modern slavery in the human resources and recruitment space; e. identified "red flags" for modern slavery to assist the employees in being able to identify modern slavery in their specific area of work; and f. explained the reporting channels for modern slavery concerns in our business, including an anonymous reporting avenue through the Group's whistleblowing procedure. <p>Separately, modern slavery awareness training was presented to the Salmon leadership team together with Salmon employees based in procurement, human resources and recruitment.</p>
<p>Review internal procurement processes to ensure modern slavery risks are being mitigated and implement any necessary changes to</p>	<p>Over the course of the year the HDAL procurement team has actively ensured its adherence with the Group's internal procurement processes through complying with the Sime Group Procurement Policy & Authorities (GPPA). The GPPA is an extensive document</p>

achieve this	that incorporates procurement best practices and the Sime corporate objectives to ensure all Group entities are adhering to best procurement practices.
Deliver Sime Darby Berhad Responsible Sourcing Policy training	<p>Training sessions have been delivered in the business on the Sime Darby Berhad Responsible Sourcing Policy (Policy).</p> <p>The training session stepped through:</p> <ol style="list-style-type: none"> a. the Policy's "general requirements" that our vendors must comply with; b. consideration of the consequences (if any) of any non-compliance with the general requirements; and c. consideration of the grieving reporting mechanism provided in the Policy. <p>The training session was engaging and concluded with a discussion of the suggested improvements/amendments to the Policy that could address any shortfalls of the Policy.</p>
Review the scoring assessment logic and weightings for the supplier Questionnaire and make any necessary adjustments	<p>A review was completed of the scoring assessment logic and weightings. Various updates were required to be made, including the following:</p> <ol style="list-style-type: none"> 1. Update the list of the high-risk country of origins, based on the most recent data from the Global Slavery Index; 2. Update to the Product/Service category risk to include "cleaning services" as high-risk; 3. Update the Workforce category to include "prison workers" as high risk and "seasonal workers" as medium risk; and 4. Various other minor amendments to the category descriptions.

Goals and Roadmap – The Future

Moving forward, the Group aims to continue developing modern slavery awareness throughout its business functions, as well as providing employees with the resources and knowledge to identify modern slavery risks. Specifically, over the next year the Group's primary areas of focus will be:

- a. Establish a modern slavery committee, with representatives from the Legal and Compliance team, Procurement and Tenders & Contracts Teams;
- b. Conduct a detailed case study in person/virtually with a large organisation in a similar industry;
- c. Continue delivering modern slavery training across the businesses;
- d. For IS, ensure active suppliers re-sign and return the VLOD every 2 years;
- e. For Salmon, assist in implementation of the VLOD; and
- f. Review internal human resources, recruitment and onboarding processes to ensure modern slavery risks are being mitigated.

Any queries on this joint Modern Slavery Statement can be directed via email to complianceau@sime.com.

Schedule – IS entities

- A. **Decoda Digital Services Pty Ltd** (being an indirect wholly owned subsidiary of SDIA) provides technological solutions to support mining restoration through data analytics and proprietary software;
- B. **Austchrome Pty Ltd** (being an indirect wholly owned subsidiary of SDIA) is a reclamation and reconditioning technologies company that carries out chrome plating, hydraulic cylinder overhauls, machining services and thermal spray coating services;
- C. **HMG Hardchrome Pty Ltd** (being an indirect wholly owned subsidiary of SDIA) principal activities are blasting and chemical stripping, chrome plating, manufacturing and refurbishment, general engineering and fabrication;
- D. **Haynes Mechanical Pty Ltd** (being a wholly owned subsidiary of SDIA) is a mechanical services, labour hire, and recruitment business; and
- E. **TFP Engineering Pty Ltd** (being an indirect wholly owned subsidiary of SDIA) provides lifting and maintenance services for the mining industry and developed the patented Pakka Jacks lifting system.