

# Modern Slavery Statement for Nutting Investments Pty Ltd.

## 2024/25.

### 1. Reporting Entity.

The reporting entity is Nutting Investments Pty Ltd (NI); A.C.N 112 137 032 and Bretts Pty Ltd (BPL); A.C.N 009 658 315. Both located at 616 Rode Road, Chermside, 4032.

### 2. Reporting Entity, Structure and Operations.

Nutting Investments is a private company. It does not conduct any operations in its own right, other than as a property owner. It is the 100% equity holder of Bretts Pty Ltd; A.C.N. 009 658 315.

Bretts Pty Ltd is a construction materials supplier headquartered in South East Queensland, with an annual turnover of \$120 million. We supply a range of building materials to residential and commercial contractors in SE Queensland and Northern NSW.

We source supply from Australian businesses, located in Australia. We have very stable relationships with our suppliers and there is very minor turnover from year to year.

The majority of our suppliers only source Australian materials. An audit of our supply chain indicates that our top 5 suppliers supply us with 48.6% of our materials (Up from 44.5% last year). These 5 are all Australian businesses, located in Australia. Our top 3 suppliers supply 40% of our materials.

We have 300 other suppliers that supply our remaining materials. We have an extremely concentrated supply chain at the top end and a long tail of many minor suppliers at the other end. We have therefore taken a practical approach to how we assess and review our suppliers, as time and resources do not permit a full review of all suppliers.

The entity does not have any joint venture partners, is not involved in financial lending or investments in any other entity other than that named above.

The entity does not source any labour supply.

### 3. Risks of Modern Slavery.

In the modern world of globalization there is always risk of modern slavery. NI has wherever possible, tried to identify these risks and qualify them to the best of its ability.

We are fortunate in that most of our supply is produce by Australian companies with operations based in Australia.

However, we recognize that some of our suppliers source material from SE Asian countries. We understand this region has been mentioned in the press as an area of

concern with regards to modern slavery. And we therefore understand that we need to be particularly aware of the possibility of modern slavery practices in this part of the world.

#### 4. Actions to Assess and Address these risks.

Our actions to date have centered on:-

1. A quantitative audit of our material supply, and
2. A qualitative audit of our material supply.

NI undertakes a risk assessment of our major supplies via a risk matrix. This matrix addresses risks via a hierarchy of controls. The controls are:-

Elimination of the risk (Source materials elsewhere)

Substitution of risk. (Substitute for other materials)

Administration. (Source from Supplier committed to Modern Slavery controls)

This matrix is used to remedy any known cases of modern slavery.

We also conduct due diligence on our suppliers via the Government's own reporting materials. This enables us to assess our top suppliers.

This due diligence shows that three of our top five suppliers (40% of supplied material) are registered and committed to the Modern Slavery initiative. They submit independent Modern Slavery Statements and abide by Modern Slavery guidelines.

NI only sources labour within Australia and is therefore comfortable that we are not sourcing any labour from a country involved in modern slavery.

#### 5. Assessment of Actions.

We find assessment of the effectiveness of our actions difficult and we appreciate your feedback and guidance on this matter.

To assess our actions we are:-

1. Recording the number of our suppliers who are monitored by the Government to ensure it remains static or increases.
2. Recording the percent of our supply coming from Government monitored suppliers to ensure it remains static or increases
3. Checking with suppliers not covered by the above and who source timber from SE Asia to get an understanding of modern slavery in their region.

#### 6. Consultation with Entities Owned or Controlled.

The reporting entity owns and controls two entities:-

Architectural Window Installations Pty Ltd. This entity is an installation company and does not source any materials. It only sources labour within Australia. As such consultation on modern slavery is not required.

Bretts Pty Ltd. This is the operating entity. This entity is included in this report under full consultation.

During the reporting period this statement covers, we actively engaged and consulted with both companies we own and control in the development of this statement. We discussed details of the *Modern Slavery Act 2018* reporting requirements; information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.

## 7. Board Approval

We are committed to continuously improving our efforts to address the risk of modern slavery in our operations and supply chains. In the coming year, we hope to:  
Expand our supplier due diligence program to include more tiers of our supply chain.  
Increase awareness of modern slavery among our staff and suppliers.

### *Modern Slavery Act 2018* Compliance:

We have complied with the reporting requirements of the *Modern Slavery Act 2018* (Cth) by submitting this Modern Slavery Statement to the Australian Government's Modern Slavery Statements Register.

This is our second-year reporting under the *Modern Slavery Act 2018*. As such we appreciate your review of our report and any suggestion on how we may improve our report in future years.

### **Board Approval:**

To show our commitment; this Modern Slavery Statement has been presented to and approved by the Board of Directors of Nutting Investments Pty Ltd.

Signed:

Date: 19<sup>th</sup> December 2025.

  
**William Nutting**

**Executive Chairman.**

Nutting Investments Pty Ltd

A.C.N. 112 137 032