

Hutcheon & Pearce Holdings Pty Ltd
Modern Slavery Statement
2022

This Modern Slavery Statement is made by Hutcheon & Pearce Holdings Pty Ltd (ACN 169 671 890) (**HPH**) and its controlled entities Hutcheon & Pearce Operations Pty Ltd (ACN 169 674 033) (**H&P**), Option AgParts Pty Ltd (ACN 144 916 683) (**OAP**) and LandHQ Pty Ltd (ACN 606 522 196) (**LHQ**) in accordance with Section 14 of the *Modern Slavery Act 2018* (Cth). This statement is submitted with regards to the financial year ended 30 June 2022 and outlines our actions to mitigate and address modern slavery risks in our operations and supply chains.

The Group - Structure and Operations

Hutcheon & Pearce Holdings is a privately owned company. The Group consists of three privately owned companies supporting a total of 22 branch locations across New South Wales. The operations of the Group include the sale of new and used farming, golf, lifestyle and turf equipment, including the supply of parts, servicing and remote support.

Family owned since 1953, Hutcheon & Pearce Operations is a privately owned company which operates 18 John Deere dealerships across New South Wales and employs 420 employees. Hutcheon & Pearce prides itself on giving customers the very best sales, service and parts support possible. The operations of Hutcheon & Pearce include the sale of John Deere farming, golf, lifestyle, turf and construction equipment as well as the supply of parts, servicing and remote support.

LandHQ is a privately owned company operating 4 John Deere dealerships across the Eastern fringe of New South Wales and employing 50 employees. The operations of LandHQ include the sale of John Deere residential and commercial mowers, utility vehicles, tractors, golf equipment, compact construction equipment and genuine parts and service.

The branch locations for both Hutcheon & Pearce Operations and LandHQ are supported by a shared resource office which centralises functional management, procurement, finance and account administration.

Option AgParts is a privately owned company that falls under the Group however no longer operates. Previously the operations of Option AgParts consisted of the importation and sale of third party aftermarket part lines.

Collectively, HPH, H&P, OAP and LHQ are referred to as the "Group" in this statement.

Supply Chain

The Group's supply chain is extensive consisting of several large global corporations as well as many leading Australian companies. Whilst the Group predominately procures products and services directly within Australia, many of the Group's suppliers are importers and distributors of a wide range of products, parts and accessories.

The Group's suppliers provide specialised products and services in agriculture, construction, precision agriculture and related machinery and parts. Products and services purchased from such suppliers include complete machinery, parts, accessories, consumables, plant and equipment and various servicing and support services.

Of the products that are imported by The Group and its suppliers and sold in Australia, majority are manufactured in factories located in the USA, Germany, and Europe. The Group's largest suppliers have policies and procedures in place to audit suppliers of component parts, aiming to minimise the risk of human rights breaches in the supply chain. The Group acknowledges that some smaller suppliers may not have the same level of policies and procedures in place, however considers such risk as low.

In addition to complete machinery, parts, plant and equipment, the Group procures a large range of services within Australia including software support services, postage and delivery services, marketing services, professional services, and cleaning services. Such services are acquired from suppliers within Australia and the risks of modern slavery occurring in the provision of these services is considered low.

Assessment of Potential Risks within the Group's Supply Chain

The Group utilises an internal risk committee to proactively identify and analyse risks within the business environment. The risk committee consists of the CEO and several Functional Managers.

The committee developed a risk framework and matrix whereby risks are identified and monitored by way of indicators and metrics specific to each risk category. The committee meets regularly to continually assess risks, including modern slavery in the Group's operations and supply chains, and to continually monitor the effectiveness of control measures. The committee provides periodic reports to the HPH Board of Directors regarding the risk framework and highlights high risk areas.

The Group relies on the risk management strategies and controls implemented by the risk committee and management to assess and manage the risk of modern slavery within the operations of the Group and its supply chain.

The Group has identified potential risk areas for Modern Slavery, as below:

- Suppliers who may source input materials from a global supply base, including countries where modern slavery has been identified as a greater risk;
- Given the extensive and diverse supply chain the Group operates within there may be minimal transparency with regards to the supply chain of smaller suppliers who may not be subject to regulatory requirements.

While the areas identified above do carry risk of modern slavery, the Group has assessed the risk of modern slavery in its supply chain as low. The Group is committed to continually assessing and addressing the risks of modern slavery within the supply chain and continually developing the risk framework, policies, processes and controls in place to address and mitigate risks that may arise.

Actions taken to address risks of Modern Slavery

In order to proactively address the risk of modern slavery, the Group relies on the risk management strategies and controls implemented by the risk committee as outlined above, as well as several internal policies, processes and procedures. The policies and procedures in place include:

- Modern Slavery Policy
- Whistleblower Policy
- Code of Ethics and Conduct
- Supplier Code of Conduct
- Work Health and Safety Policy
- Risk Management Framework

- Fair Work
- Procurement and Payment

The Group developed a Modern Slavery Policy during the 2021 financial year with the objective of assisting the risk committee and management to identify, report and implement controls to combat modern slavery. The Group continues to monitor the risk of modern slavery within the supply chain. The Group continues to review and update internal policies and procedures in place to identify and mitigate the risk of modern slavery to ensure that obligations under the Act are met.

Assessment of the effectiveness of controls

The Group continually assesses the effectiveness of the above mentioned policies, procedures and controls to combat modern slavery. Such assessments include supplier review, ongoing policy and procedure review, human resource management, communications, engagements and training.

The Group considers the controls in place are generally effective and appropriate to address the Group's risks for its operations.

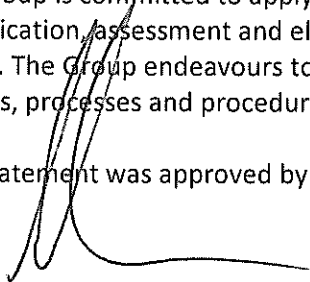
The Consultation Process

The Group management team consists of the CEO, CFO, General Managers, HR Manager, Aftermarket Manager, Supply Chain Manager, Precision Ag Manager, Sales and Marketing Manager who oversee the operations, risk and management of the Group and meet monthly to collaborate and discuss all areas of the Groups operations, identifying areas of risk and areas of improvement. Many members of the Groups management team are members of the risk committee. The Groups management team was engaged and provided input in the preparation of this statement.

Future Steps

The Group is committed to applying a continuous improvement approach to the ongoing identification, assessment and elimination of risks of modern slavery in our operations and supply chains. The Group endeavours to take proactive steps through its Risk Framework and internal policies, processes and procedures.

This statement was approved by the Board of Directors of Hutcheon & Pearce Holdings Pty Ltd



Arron Hutcheon
Chief Executive Officer
Date:

19/8/22

