

MODERN SLAVERY STATEMENT

for the 2024 – 2025 reporting period.

8 October 2025

JF HULL HOLDINGS PTY LTD
Authored by: Scott Hines



1. INTRODUCTION

This Modern Slavery Statement ("the Statement") for the **2024 – 2025** financial year is given by the reporting entity of JF Hull Holdings Pty Ltd ("JF Hull") (ACN: 010 732 304). This Statement applies to all JF Hull employees, management, and suppliers. This Statement complies with and operates in accordance with the Modern Slavery Act 2018 (Cth) ("the Act"). Each mandatory reporting criterion under the Act is outlined in Appendix A of this Statement.

JF Hull acknowledges the harm caused by modern slavery practices and is committed to the continuous improvement of its efforts to identify and address modern slavery risks in its own operations and supply chains.

2. STRUCTURE, OPERATIONS & SUPPLY CHAINS

2.1 Structure

JF Hull is a privately-owned civil engineering contractor specialising in the structural components of civil infrastructure projects including the design and construction of roads, bridges, rail systems, wharves, and water and wastewater projects.

The company operates primarily from its Head Office located at 16 Bailey Court, Brendale QLD 4500.

2.2 Operations

JF Hull is a project-centric business, typically with several projects being undertaken concurrently. Projects vary in size and scope and are often undertaken in joint venture with selected companies who compliment JF Hull's capabilities and culture. The company have developed advanced skills in concrete and steel construction, with a strong focus on engineering capability and direct performance of works utilising a long-term labour workforce.

2.2.1 Joint Venture Partners

During the **2024 – 2025** reporting period, JF Hull engaged in Joint Ventures with the following major partners:

- Bielby Holdings Pty Ltd.
- Fulton Hogan Australia Pty Ltd.
- Mcllwain Civil Engineering Pty Ltd.

2.2.2 Projects

JF Hull projects undertaken during the **2024 – 2025** reporting period:

- Beams Rd Level Crossing Removal (BHJV)
- Coomera Connector (Central) (FHMMJV)
- O'Keefe St Velobridge (JF Hull)
- M1 Pacific Motorway Update - Watland Street to Sports Drive (BHJV)

2.3 Supply Chains

JF Hull's supply chains reflect the nature of its project centric operations. The main types of goods and services procured by JF Hull include:

- Construction materials such as concrete, steel, and timber products,
- Labour hire and sub-contractors (all located within Australia),
- Plant and equipment hire,
- Logistics / Transport, and
- Specialist services / consultants (all located within Australia).

The majority of JF Hull's suppliers are based in Australia, but some key manufacturing inputs are sourced from reputable overseas entities.

3. MODERN SLAVERY RISKS IN OPERATIONS & SUPPLY CHAINS

While JF Hull considered the risks of modern slavery within its operations and supply chains are low, JF Hull recognises the need to continuously monitor and manage these risks.

JF Hull's direct workforce is entirely based within Australia and enjoy the protection of modern employment awards and industrial instruments, the National Employment Standards, and relevant state and territory Work Health and Safety regimes. In addition, JF Hull operates in accordance with the *JF Hull Charter*, *Code of Conduct*, and *Code of Ethics*, and has policies relating to *Anti-Bullying and Harassment*, *Diversity and Inclusion*, *Equal Opportunity and Anti-Discrimination*, *Freedom of Association*, *Health and Wellbeing*, *Privacy*, *Quality*, and *Sustainability and Responsible Sourcing*.

Considering the above, the potential or perceived risks of modern slavery in JF Hull's operations and supply chains have been identified as:

- **Geographical risks:** Procuring specialist materials / products / services from suppliers based in a region with different standards of human rights, labour laws, political systems, and education and skill levels.
- **Industry or sector-specific risks:** The civil infrastructure industry's use of outsourcing and third-party contracting arrangements, as well as the nature of its goods or services.

4. ASSESSING AND ADDRESSING RISKS OF MODERN SLAVERY

4.1 JF Hull Operations

During the **2024 – 2025** reporting period, JF Hull has undertaken the following actions to address the risk of modern slavery in its operations:

- Enforcing policies that address aspects of modern slavery risk, ensuring compliance with the JF Hull Charter, Code of Conduct, and Code of Ethics, and relevant policies (as noted above),
- Providing suitable reporting mechanisms (i.e. Whistleblower reporting),
- Incorporating modern slavery risks in the corporate risk register,
- Not directly using any type of forced, bonded, or indentured labour,
- Respecting the freedom of movement of its direct workforce,
- Ensuring members of the direct workforce are free to leave their employment after providing reasonable notice, and
- Complying with Australia's minimum legal working age.

4.2 Subcontractors / Supply Chains

Arrangements to reduce the risks of modern slavery arising within its subcontractor workforce / supply chains include:

- Reviewing modern slavery risks during project procurement processes,
- Incorporating modern slavery clauses into all procurement contracts, including purchase orders, labour hire contracts, and supplier/subcontractor agreements
- Engaging reputable and licensed labour hire, and plant and equipment hire service providers based in Australia,
- Requiring that all material and equipment suppliers warrant that to the best of their knowledge, modern slavery practices do not occur within the business of their suppliers, and
- Conducting appropriate due diligence processes when taking on new suppliers and subcontractors, including verifications and audits.

4.3 Remediation

Upon receiving any substantiated reports of incidents of modern slavery within either its own operations or its supply chain, JF Hull will take the following remediation actions (as appropriate):

- Ceasing relevant activities and / or relationships, including terminating contracts based on legislative breaches and / or non-compliance by suppliers or subcontractors, and
- Reviewing and improving JF Hull's existing policies and procedures.

5. ASSESSING THE EFFECTIVENESS OF ACTIONS TAKEN

5.1 Assessment Methodology

During the **2024 – 2025** reporting period, JF Hull did not receive any reports of any modern slavery within its operations or supply chains, nor did JF Hull identify any incidents of supplier or subcontractor non-compliance.

5.2 Areas of Improvement

JF Hull is committed to identifying and managing all necessary areas of improvement with regards to assessing and addressing the risks of modern slavery in future reporting periods. JF Hull will commence the following additional practices in improving the effectiveness of actions taken to assess and address the risks of modern slavery:

- Conducting periodic reviews of JF Hull's operations and supply chains in relation to modern slavery risks, including information-gathering, reporting on findings, and making recommendations,
- Including modern slavery training as part of the induction and onboarding processes for all new employees as part of the corporate onboarding training package.

6. CONSULTATION

Senior management representatives, and the JF Hull Board of Directors have all been consulted in relation to the drafting of this statement.

7. APPROVAL

This statement was approved by the JF Hull Board of Directors in their capacity as the principal governing body of JF Hull on 8/10/2025.



Warren Crowther

General Manager

JF Hull Holdings Pty Ltd

APPENDIX A - MANDATORY REPORTING CRITERIA UNDER THE ACT

The Act specifies seven (7) mandatory criteria that a reporting entity under the Act is required to cover in its modern slavery statement. The table below outlines the mandatory reporting criteria under the Act in relation to the **2024 – 2025** reporting period, and how the criteria have been met in this Statement.

Section of the Act	Mandatory Criteria	Section in this Statement that addresses the criteria
16(1)(a)	Identify the reporting entity	1. Introduction
16(1)(b)	Describe the structure, operations, and supply chains of the reporting entity	2. Structure, Operations & Supply Chains
16(1)(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	3. Modern Slavery Risks in Operations & Supply Chains
16(1)(d)	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	4. Assessing and Addressing Risks of Modern Slavery
16(1)(e)	Describe how the reporting entity assesses the effectiveness of such actions	5. Assessing the Effectiveness of Actions Taken
16(1)(f)	Describe the process of consultation with: (i) any entities that the reporting entity owns or controls, and (ii) for a reporting entity covered by a joint statement, the entity giving the statement	6. Consultation
16(1)(g)	Include any other information that the reporting entity considers relevant	Included throughout the Statement