

# BRIAN HILTON

## Modern Slavery Statement – Reporting Period 1 July 2024 to 30 June 2025

### 1. Overview

This Modern Slavery Statement outlines the actions taken by our Group during the 2024–2025 reporting period to identify, assess and address modern slavery risks across our operations and supply chains. While our regulated operating environment and workforce practices provide strong protection against labour exploitation, we recognise that risks persist within global automotive supply chains and through contractor engagements.

We remain committed to continuous improvement and transparency. This year, we focused on strengthening foundational controls, improving onboarding processes for contractors, and formalising training pathways for staff.

### 2. Our Structure, Operations and Workforce

Our Group operates multiple automotive dealerships and service operations across NSW and QLD. We employ more than 500 staff across the Group and engage additional agency workers and contractors as needed.

This statement applies to the principal governing body of Houma Holdings Pty Ltd T/a Brian Hilton Motor Group and its controlled entities:

- Grafton Motor Group Pty Ltd
- Gympie Automotive Pty Ltd
- Hunter Valley Motor Group Pty Limited
- Manning Valley Motor Holdings Pty Ltd
- New England Motor Group Pty Limited
- Notlih Investments Pty Ltd
- Orana Motor Group Pty Ltd
- The Trustee for Brian Hilton Motors (Wyoming) Unit Trust
- The Trustee for Pemell Street Unit Trust
- The Tyre Specialists Pty Limited
- Auto Culture International Pty Ltd

#### Workforce profile

- Employees: 492
- Agency workers: 28
- Contractors: Engaged for facilities, IT, construction, specialist work and field services
- Visa workers: Skilled occupation visas only; all employed under Australian labour standards

Our operations are conducted in Australia, which lowers the inherent risk of modern slavery in our direct employment practices. We comply with all applicable workplace, health and safety, and anti-discrimination laws.

### 3. Our Supply Chain

Our supply chain is typical of the automotive retail and servicing sector, involving:

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- Tier One vehicle manufacturers and distributors
- Automotive parts suppliers
- Tyre suppliers
- Technology and software providers
- Facilities, cleaning, and maintenance contractors
- Professional services and administrative suppliers

While we maintain visibility of our major Tier One suppliers, transparency significantly diminishes beyond Tier One. Many automotive materials (rubber, metals, electronics, glass, plastics) originate from global manufacturing hubs where modern slavery risks are documented.

The updated Modern Slavery Risk Assessment – December 2025 (referenced throughout this Statement) details these risks, including geographic and industry-based vulnerabilities.

## **4. Risks of Modern Slavery in Our Operations and Supply Chains**

Our updated risk assessment identified the following areas of elevated risk:

### **4.1 Operational risks**

- Foreign visa workers may be vulnerable to exploitation in certain industries; however, our controls (Fair Work compliance, VEVO checks, pay audits, and formal contracts) mitigate this risk.
- Contractor engagements carried limited risk due to inconsistent onboarding processes prior to this reporting period.

### **4.2 Supply chain risks**

- Automotive parts and materials sourced from countries with documented issues, including China, Thailand and parts of South-East Asia
- Rubber supply chains linked to known modern slavery risks
- Electronics components linked to forced labour in mining and assembly
- Large, multi-tiered supplier networks with low visibility beyond Tier One

We remain reliant on supplier self-reporting through their own Modern Slavery Statements, which indicates an industry-wide limitation.

## **5. Actions Taken This Reporting Period**

This reporting period focused on strengthening baseline controls, improving onboarding and preparing the groundwork for broader improvements.

### **5.1 Strengthening staff and management awareness**

- Existing induction content addressing modern slavery risks was retained.
- Executive and senior management training remained in place.
- Work commenced on expanding training to operational teams.

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## 5.2 Contractor induction and questionnaire – implemented

The key improvement this year was the introduction of a contractor induction process with a modern slavery questionnaire, aimed at identifying risk indicators for new contractors.

## 5.3 Internal review of procurement documents

We conducted an internal review of procurement templates and identified:

- Modern slavery clauses are not consistently included.
- Supplier onboarding does not formally capture modern slavery controls.
- Risk assessment documentation is not yet embedded into procurement workflows.

These findings have been incorporated into future actions.

## 5.4 Review of 2024 Risk Assessment

A full risk assessment review was undertaken in December 2025.

The updated assessment highlights:

- Current workforce controls
- Supplier risks
- Opportunities to improve documentation
- Introduction of the contractor questionnaire
- Training targets for the 2025–2026 period

## 6. Key Performance Indicators (KPIs)

To measure the effectiveness of actions taken, we have adopted the following KPIs for the next reporting period:

1. 80% of new starters complete modern slavery training as part of onboarding.
2. 80% of new contractors complete the modern slavery questionnaire and induction.

These KPIs aim to embed awareness at all levels and strengthen supplier and contractor engagement.

## 7. Assessing the Effectiveness of Our Actions

This year's activities were foundational. While limited improvements were implemented, the following steps represent measurable progress:

### What was actually done

- Introduced and deployed the contractor induction and questionnaire (80% KPI now set for 2026 reporting).
- Maintained executive-level training.
- Reviewed procurement documents for gaps.
- Completed the updated Modern Slavery Risk Assessment – December 2025.

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- Identified areas of the supply chain with elevated risk (rubber, metals, electronics).

## **Gaps identified**

- Supplier agreements do not consistently include modern slavery clauses.
- There is no centralised supplier risk monitoring system.

## **Forward actions (2025–2026)**

- Integrate modern slavery clauses into all new procurement templates.
- Implement a supplier onboarding checklist that includes modern slavery risk questions.
- Track contractor questionnaire completion against the new KPI.
- Strengthen documentation and record-keeping for supplier due diligence.

The updated risk assessment will serve as the baseline for next year's measurement.

## **8. Consultation With Group Entities**

All Group entities operating under the reporting obligation were consulted through:

- Executive discussions
- Policy review meetings
- Shared procurement processes
- Workforce training oversight

The updated risk assessment was conducted for all entities, and all entities endorsed this Statement.

## **9. Approval**

This statement was approved by CEO and Sole Director Josh Hilton on 8 December 2025 in their capacity as principal governing body of Houma Holdings Pty Ltd T/a Brian Hilton Motor Group and its controlled entities:

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- Auto Culture International Pty Ltd

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**Joshua Hilton**

**Chief Executive Officer**

**Director**

A handwritten signature in black ink, appearing to read 'Joshua Hilton', with a long horizontal flourish extending to the right.