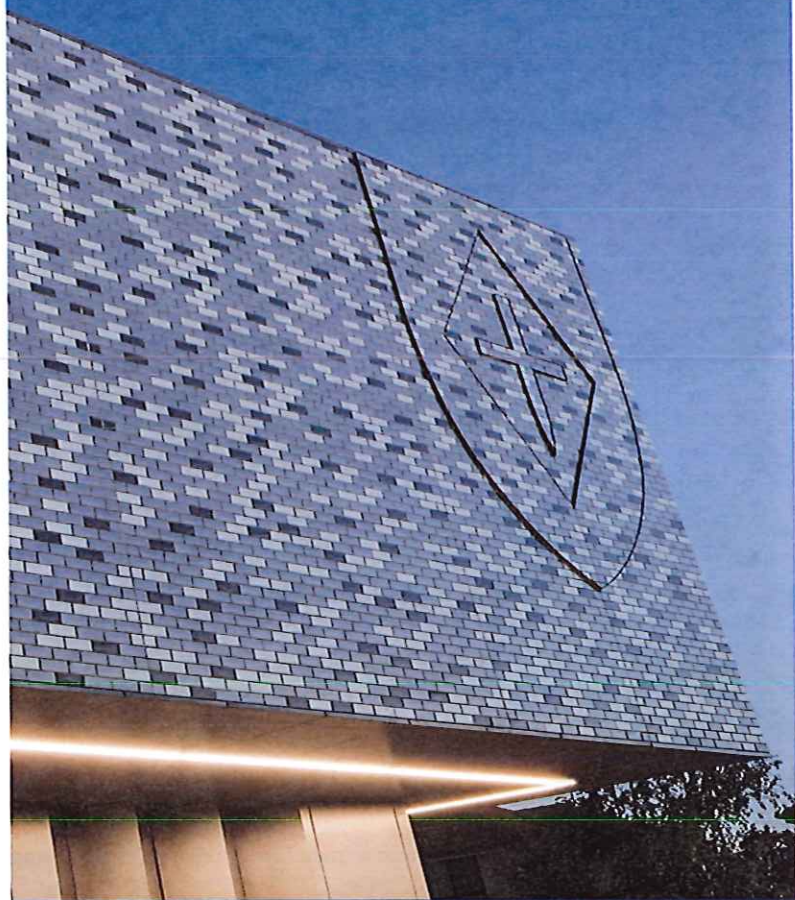


Modern Slavery Statement

2021

H.TROON





Modern Slavery Statement 2021

H Troon Pty Ltd

1. Introduction

H.Troon Pty Ltd ACN 120 422 755 (H Troon) is a 151 year-old company with its headquarters in Ballarat, Victoria. It is managed by the fourth and fifth generation of the Troon family to have worked in the business. The company consistently turns over in excess of \$160 million of construction work annually, directly employing over 100 people.

H.Troon is committed to implementing systems and controls to minimise the risks and effectively eliminate the incidence of modern slavery within its own business operations and supply chains.

This statement is a formal expression of its commitment, identifying the risks and the mitigation strategies, as well as providing measures for assessing the effectiveness of the strategies which have been adopted by H.Troon in accordance with section 14 of the *Modern Slavery Act 2018* (Cth).

2. Identification of reporting entity

H Troon makes this statement as a single reporting entity in accordance with section 13 of the *Modern Slavery Act 2018* (Cth) ('Act'). H Troon's principle place of business is located at 833 Creswick Road, Wendouree Victoria Australia.

3. H Troon's structure, operations and supply chain

Structure

H.Troon is a construction company incorporated in Australia with its registered office address located at 1220 Sturt Street, Ballarat, Victoria. It consists of a board of directors and is managed by fourth and fifth generation family members Steven Troon and James Troon.

Operations

H.Troon has established itself as a builder/developer of construction projects across Australia in multiple market segments including, retail, commercial, health, education, community and sporting infrastructure and property development. H.Troon primarily operates on a design and construct delivery model, procuring 50 percent of its annual turnover using this model.

H.Troon operates its own structural steel fabrication facility from its headquarters, with this direct control enabling it to deliver projects on time and budget. At the Ballarat manufacturing headquarters, H.Troon also has the capacity to manufacture all construction team requirements for both aluminium facade systems and joinery products and thereby bringing a number of its material procurement and supply chain requirements 'in house' and reducing the risk of potential modern slavery practices involving third party suppliers.

Supply chains

H.Troon works in all states and territories in Australia and New Zealand. H.Troon have built long and lasting relationships with its suppliers and subcontractors over many years. Our selection of supplier and subcontractors is paramount in our success in the construction industry.

Our selection process for both Suppliers and Subcontractors includes compliance with Relevant Standards, Health and Safety Requirements, Environmental Management systems, Quality Management Systems, Location and relevant experience.

4. Risks of modern slavery practices in the operations and supply chains of H.Troon

H.Troon has identified potential risks of modern slavery practices in its operations and supply chains including:

- Forced Labour or Services including Slavery, Servitude and Low Skilled labour.
- Child Labour
- Debt Bondage
- Health and Safety Conditions

5. Actions taken by H. Troon to address risks of modern slavery practices, including due diligence and remediation processes

H.Troon has taken a number of different approaches in order to address risks of modern slavery.

H.Troon has introduced a Modern Slavery Policy, which has been distributed to its employees, major suppliers and published on its website. The Modern Slavery Policy provides an explanation of what modern slavery is, including some of the forms of modern slavery, and introduces a mechanism for employees to report any suspected instances of modern slavery within the organisation or supply chains.

Other actions taken by H.Troon to address risks of modern slavery practices include:

- introduction in all contracts, particularly those with contractors, a clause requiring compliance by the contractor with all relevant Modern Slavery legislation, meaning the Australian *Modern Slavery Act* and any additional modern slavery legislation in the jurisdiction in which they operate.
- Implementing an ongoing monitoring program
- Implementing a risk assessment questionnaire to be distributed to and returned by contractors to give H Troon better insight into the presence of modern slavery risks, and which areas need to be improved/addressed further
- Development of a modern slavery training module for employees (delivered in person, or online)
- Providing within contracts for H.Troon to have the ability to terminate the agreement should any instances of modern slavery become apparent.

6. Assessing the effectiveness of actions taken by H.Troon to address the risks of modern slavery practices

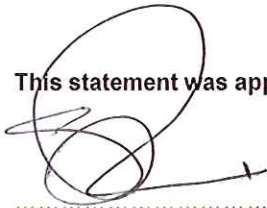
H Troon is committed to continuous improvement in its management practices, day-to-day operations and interactions with all employees, subcontractors, consultants, suppliers to identify risks of modern slavery practices and ensure compliance with the *Modern Slavery Act 2018 (Cth)*.

These commitments will be reflected and reported through publication of a Modern Slavery Statement on an ongoing annual basis.

The actions taken by H.Troon to assess the effectiveness of the strategies used to mitigate the risks of modern slavery practices include measuring:

- The number of contracts with modern slavery expectations included
- The number of employees completing a modern slavery training module
- Auditing employee awareness of the Modern Slavery policy
- Monitoring the number of reports made by employees regarding suspected instances of modern slavery within the organisation or supply chains

This statement was approved by the board of H Troon Pty Ltd on 2 June 2021.



Steven Craig Troon
Director
2 June 2021



James Elliot Troon
Director
2 June 2021