

Modern Slavery Statement

1st July 2023 to 30th June 2024

Introduction

In accordance with the Commonwealth Modern Slavery Act 2018, Strident Investments Pty Ltd (Strident Investments) is pleased to present its Modern Slavery Statement for the period from the 1st July 2023 to the 30th June 2024.

This is the first Modern Slavery Statement prepared by Strident Investments and sets out the actions taken by the organisation and its subsidiaries, including our risk management strategy, consultation undertaken and process for continual monitoring and review.

This Modern Slavery Statement has been reviewed and endorsed by the Strident Investments Board on 9th December 2024.

Pursuant to the requirements of the Act, authorised persons have reviewed the contents of this Statement and confirmed its accuracy.

This Statement is signed by Tim McCue in his role as a Strident Director on 9th December 2024.

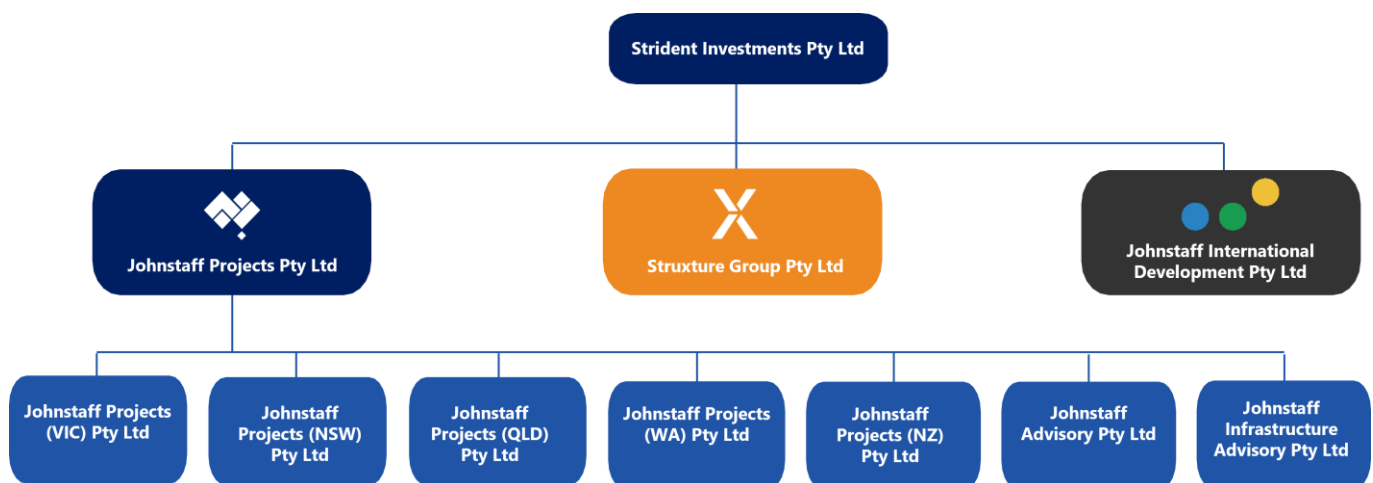


Tim McCue
Director

About Strident Investments

Strident Investments is an Australian Private Company that invests in various entrepreneurial ventures typically operating in the Australian and New Zealand construction sectors. Strident Investments predominantly trades as an investor, and does not employ any staff or have any operational offices.

The Strident Investments group of companies comprise the following entities:



Johnstaff Projects Pty Ltd (Johnstaff), Struxture Group Pty Ltd (Struxture) and Johnstaff International Development Pty Ltd (JID) have their own Boards, who are committed to identifying and reducing the risks of modern slavery in their operations and supply chain.

Procurement Arrangements

Given the nature of our operations as an equity investment company Strident Investments does not purchase or sell any products or services. Our procurement is limited to purchasing from Australian owned and operated organisations for office related services, equipment and consumables (i.e. stationery, IT hardware and software) or professional services, such as legal counsel. Procurement of services is organised informally or through a short to long term contract.

Consultation

This Modern Slavery Statement has been prepared in consultation and with input from the Strident Investments Board, which was finalised based on a review of the organisation's modern slavery risks within our operations, as well as the Boards of Johnstaff, Struxture and JID.

Strident Investments will ensure that the Board continues to monitor and consult on its modern slavery risks to ensure such risk is mitigated.

Modern Slavery Risks

Strident Investments confirms that the risk of modern slavery being present in our own operations and supply chain in Australia is low and acknowledge that in some instances there may be suppliers engaged that source products from other countries and may not always achieve full transparency of our supply chain.

During the reporting period of 1st July 2023 to the 30th June 2024, Strident Investments was not made aware, nor did we identify any modern slavery issues within our operations or supply chain.

Strident Investments has visibility over our entities risk management and compliance frameworks, where each business has assessed its modern slavery risks as follows:

- Johnstaff provides consulting services in Australia and New Zealand. Its modern slavery risks have been categorised as being in its office operations and suppliers of professional consulting services.
- Struxture provides constructions services in Australia and New Zealand. Its modern slavery risks have been categorised as being in its office operations, suppliers of construction materials or plant, and trade contractors.
- JID provides consulting services in international development sector in Australia, New Zealand and the broader Pacific region. Its modern slavery risks have been categorised as being in its office operations, suppliers of professional consulting services and suppliers of construction services, materials or plant.

Risk Mitigation Actions

Following the identification of modern slavery risks associated with its operations, from 1st July 2023 to 30th June 2024, Strident Investments completed the following activities:

- Developed a Modern Slavery Risk Assessment checklist for use in self-assessment by existing and prospective suppliers of the risk of modern slavery in their operations and supply chain; and

- Committed to continually monitoring the effectiveness of its subsidiaries in identifying and minimising the risk of modern slavery in their operations and supply chains.

Johnstaff reports in accordance with the Modern Slavery Act and has submitted its own Modern Slavery Statement since 2022/2023. Johnstaff has developed its own Modern Slavery Policy and staff awareness training.

Struture has undertaken a risk assessment of its operations and supply chain, and its Board has approved a Modern Slavery Policy ready for implementation.

JID has also undertaken a risk assessment of its operations and supply chain, and its Board has approved a Modern Slavery Policy ready for implementation.

Evaluation

Strident Investments will assess the effectiveness of the actions implemented to manage modern slavery risks within its operations through:

- Monitoring the regulatory environment associated with workplace laws, including any ratification of conventions or protocols relating to local or international labour requirements;
- Continuing to assess our supply chain for risk and those of our subsidiaries;
- Monitoring and positively responding to any grievances and whistle-blower related matters, where received; and
- Continuing to build on executive management awareness to ensure modern slavery risks are appropriately managed.