

**TUTT BRYANT GROUP LIMITED**

*A Member of Tat Hong Holdings Ltd*



# MODERN SLAVERY

STATEMENT 2021

**EQUIPMENT SALES**

**HIRE**

**HEAVY LIFT & SHIFT**

**UNDER THE ONE HOOK**

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# Introduction

Tutt Bryant Group Limited and its consolidated entities ("Tutt Bryant") are committed to the eradication of Modern Slavery within its operations and throughout its supply chains. At Tutt Bryant, we are dedicated to upholding human rights. We do not condone any breach of human rights that may impact our business and the industries in which we operate, and understand the importance of working responsibly and ethically whilst also upholding our core company values.

At Tutt Bryant, each of our consolidated entities work together in their journey to understanding how we can best address Modern Slavery concerns. We are committed to adhering to the *Modern Slavery Act 2018* (Cth) (the "Act") statutory requirements as well as continuing to look toward international best practice concepts and models.

This statement builds on what we achieved last year and highlights the steps we have taken this financial year to 31 March 2021. While the Covid-19 pandemic's effects continue to endure, Tutt Bryant remains committed to ensuring the same principles and high standards are maintained in this key area.

## Our Approach

This Modern Slavery Statement is made on behalf of Tutt Bryant pursuant to the Act, and sets out our approach to address modern slavery risks, as well as any suspected human rights breaches, relating to our business operations and supply chains.

This is Tutt Bryant's 'Second Modern Slavery Statement' and it describes our ongoing commitment to the requirements of the Act and associated regulations for our financial year ending 31 March 2021.

## Our priorities throughout 2020/2021

- ✓ **Increasing Awareness**  
Design a workforce education program to train staff and management on Modern Slavery risks and requirements.
- ✓ **Development of our Supplier Questionnaire**  
Build a supplier tool to enhance our ability to identify and manage supplier risk profiles.
- ✓ **Establishment of external compliance procedure**  
Align reporting processes with external escalation standards. Ensure appropriate reporting mechanisms are included in existing channels.
- ✓ **Due Diligence and Risk Assessment**  
Monitor the risk profile throughout Tutt Bryant and its supplier network by identifying new high-risk areas that require immediate attention whilst also commencing assessment of low-risk categories.
- ✓ **Assessment**  
Evaluate our Modern Slavery processes and identify areas for improvement or enhancement.

## Progress against our 2020/2021 priorities

The persistence of the Covid-19 pandemic adversely affected progress towards some of our objectives. During the reporting period, we maintained a working group to monitor our Modern Slavery commitments to ensure, where possible, project momentum was retained.

### ✓ **Increasing Awareness**

An internal training program was written during the reporting period. This program explains what Modern Slavery is, the risks within our Supply Chains and how to identify potential human rights breaches. It concludes by educating our workforce and management on how to report any suspected breaches in these areas.

### ✓ **Development of our Supplier Questionnaire**

We have commenced developing our Supplier Questionnaire which is an instrument used to identify Modern Slavery risks in our supplier network. In addition, we consulted with various stakeholders throughout the reporting period to ensure the most relevant information would be captured.

### ✓ **External Compliance Procedure**

We assessed our established reporting mechanisms to ensure they align with external escalation points when Modern Slavery or human rights risks are identified. Furthermore, these mechanisms will be included in both our workforce education program and supplier engagement plan using our supplier questionnaire.

### ✓ **Due Diligence and Risk Assessment**

We have continued to monitor our group and its supplier networks for any high-risk areas that may require immediate action. Additionally, we have looked further into our Supplier network to assess any lower risk categories that we could identify in our efforts to ensure Modern Slavery risks are eradicated throughout our business partnerships.

### ✓ **Assessment**

We evaluated our approach to Modern Slavery against other industry leaders to identify any gaps in our analysis of the matters at hand, and sought to address those through our current statement or project plan where immediate improvement was not possible.

## Our Structure, Operations and Supply Chain

### Our Structure

Tutt Bryant Group Limited (ACN 009 242 675 / ABN 89 009 242 675) is an Australian public unlisted company limited by shares with its registered head office in Sydney Olympic Park, New South Wales. It is an industrial services organisation providing sales, hire, parts, service, and engineering solutions to Australia's construction, mining, engineering and trades sectors. Tutt Bryant Group Limited is 100% owned by Singapore-based Tat Hong Holdings Ltd, a privately held company ranked as one of the largest crane owners/operators in the world.

## Our Operations

**Tutt Bryant Equipment** is the organisation's Equipment Sales & After-Sales Support (Parts & Service) division. As a national multi- franchised distributor of earthmoving and construction equipment, Tutt Bryant Equipment exclusively represents several global brands in Australia. In addition to capital equipment sales, Tutt Bryant Equipment supports its customers in providing spare parts, consumables, mechanical service, repairs and other support functions.

**Tutt Bryant Hire** is the organisation's General Equipment Hire division. With a comprehensive range of equipment for hire from 19 geographically diverse locations, Tutt Bryant Hire services customers in Australia's construction, mining, engineering and trades sectors. The general equipment range includes earthmoving, excavators, compaction, access, materials handling, traffic management, air compressors, lighting & power, welding, site accommodation, pumps and others.

**Tutt Bryant Heavy Lift & Shift** is the organisation's Cranes, Heavy Lifting & Specialised Transport division. Operating one of the largest crane fleets in Australia, Tutt Bryant Heavy Lift & Shift provides both wet (with operator) and dry (without operator) crane hire, as well as engineered turnkey solutions to meet all heavy lifting and transportation needs of major projects. The conventional crane fleet is supplemented by specialised lift & shift assets, such as modular transporters (including self-propelled units), hydraulic jacking systems and other skating and skidding equipment.

**Tutt Bryant Finance** is a 50% joint venture company providing complementary financing options to customers.

## Our Supply Chain

Our supplier relationships have been stable throughout the reporting period and are generally unchanged from our last statement. We continue to engage with organisations in developed economies with minimal engagement in emerging ones. We have had some procurement from suppliers in competitive market countries such as China, however this remains to only be on a nominal basis. When measured by value, most of our payments are made to suppliers in Australia, Japan, Finland, Italy, the United States of America and, our parent company in Singapore.

We often operate in remote locations throughout Australia with many contracts supporting local procurement policies to strengthen local communities. The goods and services we purchase cover the full lifecycle of heavy machinery and transport services. Our largest spend categories are in heavy equipment, fuel, spare parts and materials, energy and logistics, notwithstanding our largest cost groupwide being employment/wages and employee development.

As a member of Tat Hong Holdings Ltd, we adhere to its '**Group Sanctions Compliance Policy**' and the '**Sanctions Compliance Principles, Procedures and Guidelines**.' Our compliance with sanctions laws and regulations that are administered, enacted and enforced by the United Nations Security Council, the European Union, the United Kingdom and the United States of America prohibit Tutt Bryant from participating in any transactions or business relationships/dealings with prohibited countries or persons. The total trading ban and prohibited countries currently include: The Democratic Republic of Korea (North Korea), Cuba, Iran, Syria, Russia, and Venezuela. We also take extra caution with the movement of equipment between Australia and Myanmar. As a reference, we utilise the Australian Department of Foreign Affairs and Trade's published list of Sanctioned Companies and Individuals to scrutinise our customer and supplier records for compliance.

# Risk Assessment and Mitigation

During the reporting period, we expanded our due diligence processes to assess potential low risk areas we were unable to cover previously. In addition, we have continued to monitor the areas considered high risk to ensure that any perceived or identified occurrence of Modern Slavery risks, requiring immediate attention and mitigation, were addressed immediately, through the appropriate channels.

When assessing risk, we consider various factors including: the sector, industry, types of products and services, spend per annum and geographic location. Additionally, we have utilised public resources, such as the Modern Slavery Statements Register, to enhance our understanding and aid us in improving our own approach.

Tutt Bryant's view of Modern Slavery risks within our direct business operations remains low. However, we continue to recognise that we could potentially be indirectly exposed to Modern Slavery through our supply chains and customers.

## Due Diligence and Remediation Processes

### Due Diligence

Tutt Bryant takes a risk-based approach to due diligence, which considers factors such as the goods or services, country of origin, vendor and spend level with our suppliers. During the reporting period, we expanded our analysis from tier one suppliers to lower tiers. We recognise the importance of understanding risks in our supply chains beyond our regular business partners with whom we have direct contractual relationships.

Due to the enduring Covid-19 pandemic, our analysis this reporting period was primarily based on information obtained through public sources. The pandemic provided some impediment to on-the-ground identification of risks where lockdowns were in place. However, where a high-risk supplier is identified, we remain committed to engaging directly with that supplier, however possible, for more detailed information. Direct information requests include enquiries about the supplier's labour policies as well as asking about specific concerns, such as whether and why the supplier retains the workers' identification documents or limits its employees' freedoms or human rights.

### Remediation Processes

We aim to build our employees' awareness of how best to engage with Tutt Bryant's risk management processes and how they appreciate and recognise what constitutes a Modern Slavery incident. Active projects in development include our Internal Modern Slavery Awareness Training Program and our External Supplier Questionnaire. These programs are geared toward increasing awareness and improving our information gathering abilities. In addition, we have looked at how to automate these systems to ensure the processes we put in place will be completed in a timely and effective manner. Our intention for these projects is to provide us with opportunities to improve our response to perceived or identified instances of Modern Slavery and human rights risks.

Both our internal training program and external questionnaire will contain information on grievance mechanisms so that systemic issues can be highlighted, serving to strengthen and inform our Modern Slavery and human rights due diligence. These systems may include direct engagement with customers and other stakeholders. We are committed to taking steps to understand the issues at hand and take appropriate action, including where necessary, referring matters to the appropriate authorities. We have used this year to review our reporting mechanisms so that they adhere to external escalation points appropriately to ensure compliance.

To date, we have not identified any instances of Modern Slavery associated with our operations or in relation to our supply chains.

## Measuring Effectiveness

Our grievance mechanisms are one way we can track our performance against our risk mitigation goals. No Modern Slavery related complaints were received during the reporting period from 1 April 2020 to 31 March 2021.

The actions we have engaged with throughout the reporting period include: senior management annually reviewing our mitigation actions and responses to Modern Slavery concerns, site visits to suppliers where possible, development of an external supplier questionnaire, maintain pre-qualification checks for suppliers to include a Modern Slavery assessment, and embedding specific auditing rights and/or Modern Slavery risk mitigation expectations into new contracts with suppliers. In consultation with the executive management team we will also be introducing a biennial external review of our Modern Slavery Risk Program to ensure our continuous improvement objectives are being met.

## Stakeholder Engagement and Consultation

At Tutt Bryant, we understand the value of engaging with our business partners and relevant government agencies to help us identify and manage Modern Slavery risks. A coordinated approach in addressing such risks in our supply chains is the only way to effectively address any concerns.

Unfortunately, throughout the reporting period, the Covid-19 pandemic did impact our ability to effectively identify Modern Slavery risks and incidents that may have been found through in-person activities, such as site visits and vendor meetings. However, these took place wherever possible to ensure the impacts of the pandemic were minimised.

While reporting is conducted by the head entity, each of the consolidated entities is engaged in the discovery process of exploring operational and supply chain exposures. Furthermore, consultation has been held across all consolidated entities for clarification and forward planning of future Modern Slavery, human rights and sanctions initiatives.

# Looking Forward

Modern Slavery risk management requires continuous commitment and ongoing collaboration both from within our business and through multi-stakeholder dialogue. We are committed to continuing our efforts to collaborate with our internal and external stakeholders to prevent and address human rights risks, including Modern Slavery, as well as encourage continuous improvement.

## Over the next reporting year, we aim to focus on:

### Process improvement

- ✓ Engaging an external provider to conduct a biennial review of the systems and processes we have implemented to address Modern Slavery concerns and risks.
- ✓ Implement our internal training program on Modern Slavery Awareness for all current employees to complete via our internal Learning Management System and include the training program in our new employee induction program.
- ✓ Consult with our workforce to identify gaps in knowledge and develop ways to improve identified deficiencies.

### Data analysis and due diligence

- ✓ Continue to evolve our approach in identifying risk factors from available information sources and determine effective mitigation steps.
- ✓ Automate some of our data capture processes to ensure we receive more information about Modern Slavery risks in our supply chain.
- ✓ Finalise the development of our Supplier Questionnaire and commence implementation.
- ✓ Continue to explore alternative ways to engage with our stakeholders where the Covid-19 pandemic has impacted traditional methods.

We continue to improve our approach towards mitigating risks of Modern Slavery throughout our business and we will continue looking for new and better ways to eradicate any risk of Modern Slavery in our business dealings. We understand the importance of engaging with others to reach overall improvement and impact on the global eradication of Modern Slavery and human rights abuses.



*This Modern Slavery Statement is provided on behalf of Tutt Bryant Group Limited and its consolidated entities and is approved by the Tutt Bryant Group Limited Board of Directors.*



Chen Wei Ng

Managing Director

Tutt Bryant Group Limited

# TUTT BRYANT GROUP LIMITED

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