


**JOHN
HOLLAND**

Modern Slavery Statement 2023



An aerial photograph of a rugged landscape. The foreground is dominated by a wide, shallow river with turquoise water, interspersed with small, green, tree-covered islands. The river flows from the bottom left towards the top right. The banks are composed of bright red sandstone, showing signs of erosion with various gullies and ridges. Sparse, low-lying green vegetation is scattered across the red earth. In the upper right, a bridge structure is visible, crossing the river. The overall scene is a striking contrast of colors and textures.

Front cover photo: The Edmonton to Gordonvale Project (E2G) team and the Menmuny Overpass located in the shadow of Walsh's Pyramid. Menmuny was an Indigenous leader for the area, and this overpass, one of nine bridges constructed by the project, will provide a vital link to the Yarrabah Indigenous community located south of Cairns, Far North Queensland.

Acknowledgement of Country

John Holland pays respect to the Traditional Owners and Custodians of the land on which we work and live, and their connections to land, sea and community. We pay our respect to their Elders past and present and extend that respect to all First Nations people. We extend that acknowledgement and respect to other lands on which we work including to Aotearoa New Zealand and to all Māori People.



Our values



Caring



Empowering



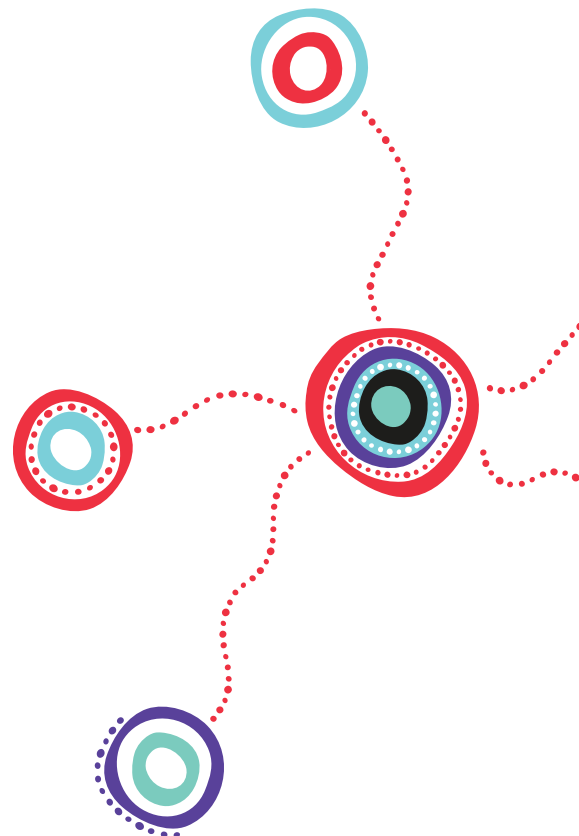
Imaginative

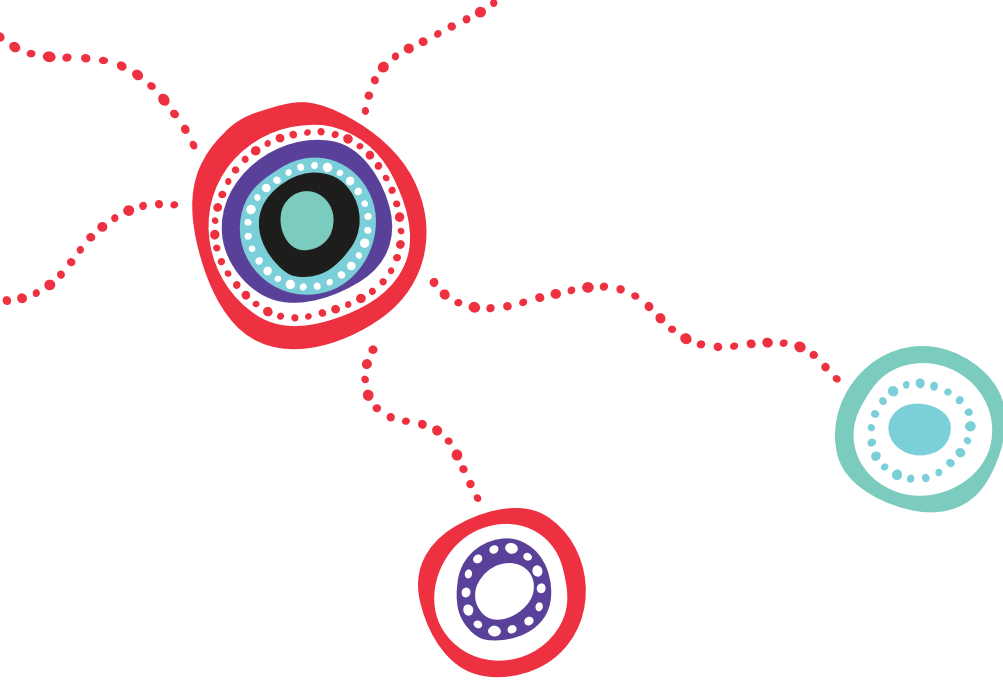


Future-focused

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About this Statement

John Holland has prepared this Modern Slavery Statement (Statement) to address the requirements of the Australian *Modern Slavery Act 2018* (Cth) (Act). The reporting period covered by this Statement is 1 January 2023 to 31 December 2023.

This Statement applies to the following five reporting entities:

- CCCI Australia Pty Ltd
- John Holland Holdings Pty Ltd
- John Holland Group Pty Ltd
- John Holland Pty Ltd
- John Holland Queensland Pty Ltd

In this Statement, the terms 'John Holland', 'we' and 'our' are used to refer collectively to these five reporting entities. A description of each of these individual entities is set out in Appendix B.

This Statement does not apply to John Holland's non-controlled joint ventures. Further, this Statement does not apply to entities in which John Holland has an interest but are required to report in their own right under the Act, such as Cross Yarra Partnership.

The Board of John Holland Group Pty Ltd approved this Statement on 18 June 2024. It is appropriate that the Board of John Holland Group Pty Ltd approved the Statement under the Act because this entity is the highest operating entity and main head entity for the John Holland group, and is the entity that has adopted the policies, procedures and processes under which the John Holland group operates (including the other subsidiary reporting entities).¹

The other reporting entities covered by this Statement were consulted on its development, as set out in Section 05. As required by the Act, the Statement has been signed in Section 05 by Joe Barr, Director & Chief Executive Officer. This Statement has not been externally assured.

We welcome feedback on this Statement and how John Holland is addressing modern slavery risks at: secretariat@jhg.com.au.

¹ Although CCCI Australia Pty Ltd is the head Australian entity for the John Holland group, as a holding company it has no active operations (including procurement activity) and two of its four Directors approved this Statement as common Directors of John Holland Group Pty Ltd.



Message from our CEO

At John Holland, our purpose is to transform lives.

For us, transforming lives is far more than delivering infrastructure, buildings, and transport for our communities. We also think deeply about how we do it and the impact we have on communities.

We expect dignity and respect for all our employees, and this includes any activities within our business operations or direct supply chain which cause or contribute to any form of human rights abuse.

I welcome the opportunity to release our fourth Modern Slavery Statement, which outlines efforts to better understand this global challenge, and collaborate with our partners to assess and address the risks within our supply chain.

John Holland's Code of Business Conduct and Supplier Code of Conduct set clear standards for our people and suppliers.

We have also continued to increase our engagement and investment in the social enterprise sector as another important way of managing risk and supporting communities.

John Holland's projects cover the breadth of Australia and so too does our supply chain. Our supply chain includes everything from civil subcontractors to concrete suppliers, and from professional consulting services to fabricated steel suppliers and labour hire.

It is imperative that businesses such as ours lead and take action to protect human rights at every level. It's transforming lives in action.

Joe Barr
Chief Executive Officer

Our structure, operations and supply chain

Who we are

Since our foundation 75 years ago, we have been committed to supporting communities around Australia by building infrastructure that transforms lives and makes us more connected.

We are one of the nation’s leading infrastructure and engineering companies. By finding solutions to complex challenges and opportunities, we transform communities to make them easier to move around, more connected and better places to live. We have had a hand in building the Australia we know today, from Parliament House in Canberra to the Alice Springs to Darwin Rail Link, from the MCG’s Great Southern Stand to Sydney Metro.

We partner with communities to provide essential infrastructure. We do this by designing, engineering, constructing and operating services across Australia and New Zealand.

We believe in creating people-centred solutions to complex challenges. We always aim to have a positive impact on communities and other stakeholders, while continuing to push boundaries of innovation.

The legacy we leave is just as important as the physical property and infrastructure we build. We acknowledge that our industry has a wide impact on the environment, communities, suppliers and subcontractors and their workers. We take the responsibility to conduct a sustainable business seriously, including by taking steps to assess and address modern slavery risks in our operations and supply chain.

Our structure



John Holland operates as a corporate group and CCCI Australia Pty Ltd is the Australian parent company. CCCI Australia Pty Ltd is a wholly owned subsidiary of China Communications Construction Company Limited (CCCC), which is dual listed on the Hong Kong (1800.HK) and Shanghai (601800SH) Stock Exchanges. CCCC is one of the world’s largest infrastructure construction companies.

In addition to the reporting entities set out in Appendix B, the John Holland Group includes a range of controlled entities. These entities undertake a variety of functions, including acting as holding or special purpose companies, or supporting the Group’s construction, operation and maintenance activities.

Two of these controlled entities are incorporated outside Australia, in New Zealand and the United Kingdom. Of these two entities, only the New Zealand entity undertakes active operations, which relate to rail construction and maintenance contracting.

John Holland also undertakes a range of joint venture activities, which primarily relate to construction activities in Australia during the reporting period.

Our operations

Our focus is to deliver positive change for communities by getting people home safely, helping them stay connected, and developing infrastructure for the future.

We work across Australia and New Zealand and our main areas of operation include:

- **Infrastructure:** Delivering and maintaining infrastructure, such as major roads and bridges, energy infrastructure, tunnelling, and water and wastewater treatment solutions
- **Rail & Transport:** Rail and transport operations and maintenance and the construction of rail assets
- **Building & Development:** Major building projects, such as correctional facilities, hospitals, stadia, education and research facilities, and commercial and mixed-use development
- **Energy transition:** Helping to transition the energy network and communities to affordable, reliable and sustainable energy solutions
- **Technology and innovation:** Dedicated Technology, Engineering and Knowledge (TEK) team developing smarter and better ways of delivering for our customers and stakeholders.

Some of our key projects include delivering the Melbourne Metro Tunnel and West Gate Tunnel projects in Victoria, the iconic Sydney Gateway and Sydney Metro in New South Wales, and Waterfront Brisbane in Queensland. More detail about our operations and projects is set out on our [website](#).

To support our operations, we employ over 5,700 people. Our people undertake roles relating to engineering, project management, site supervision and internal corporate functions such as commercial, legal, finance, people, risk, strategy and IT. We also engage contractors to work on our sites across Australia and New Zealand in a range of construction related roles, including tunnelling, surveying, building, surfacing and track work. The numbers and roles of these contractors vary and are determined by the size and quantity of our projects at any time.

Key information about our operations and project locations is set out in the infographic and map on pages 8 to 11.

Our governance

We recognise that a workplace which prioritises integrity, ethics, transparency and reporting is foundational to the robust and thoughtful decision making which produces the best solutions. The John Holland Group Board of Directors is responsible for John Holland's long-term success and for managing the Group's business affairs to the highest standards of corporate governance. The Board consists of up to six shareholder-appointed directors and three executive directors.

To assist the Board in discharging its responsibilities, a tiered corporate governance framework is in place to delegate functions to several Board and Management Committees. The Board Governance, Compliance & Audit (GCA) Committee supports the Board to monitor the financial performance and disclosures of John Holland, as well as compliance with applicable laws and regulations, including our modern slavery reporting. Quarterly reports are provided to the GCA Committee on the actions being taken to assess and address modern slavery risks. Further, the Board's Risk Committee supports the Board to oversee the framework for, and the reporting of, risks including enterprise, project procurement and project delivery risks. The project risks include those relating to modern slavery and other procurement activities.

Senior managers across John Holland with responsibility for functions relevant to preventing and addressing modern slavery report to the Board through appropriate channels, such as the GCA and Risk Committees.

Our operations

80

projects across
Australia and
New Zealand

\$13.5b

work in
hand

5,739

direct
employees

\$7.8b

New work
won in 2023

Our supply chain

Over
8,000
suppliers

Approximately
300
international
suppliers

Over
\$5.4b
supplier spend

Over
\$108m
spend with social
and Indigenous
enterprises

Our projects and offices

In 2023, we had 80 projects in Australia and New Zealand. We have delivered projects in the following sectors:

Infrastructure

- Airports
- Ports and marine
- Roads and bridges
- Tunnelling
- Water and wastewater

Rail & Transport

- Design and construction
- Delivery of key rail services
- Systems engineering delivery and integration
- Operations and maintenance

Building & Development

- Commercial
- Health
- Justice and corrections
- Education and research
- Tourism and stadia
- Precincts and airports
- Accommodation and living
- Property

Energy

- Pumped hydro and firming
- Transmission lines and substations
- Mechanical and electrical
- Onshore and offshore wind

Enterprise wide

Our Technology, Engineering and Knowledge (TEK) team provides technical excellence, innovative technology and a framework for knowledge and innovation across our business.

Business units are supported by Health, Sustainability and Climate (HSC); Finance; Information Technology (IT); Commercial; People; Social Impact; and Customer and Corporate Affairs teams.

7

Western Australia



Our offices

Corporate Head Office (Melbourne)

Wurundjeri Country
Level 9, 180 Flinders Street,
Melbourne 3000, Victoria

Sydney Regional Office

Gadigal Country
Level 3, 65 Pirrama Road,
Pyrmont 2009, New South Wales

Brisbane Regional Office

Turrbal and Jagera Country
Level 3, 1000 Ann St,
Fortitude Valley 4006, Queensland

Perth Regional Office

Noongar Country
Level 8, Commercial Tower 3,
10 Telethon Avenue,
Perth 6000, Western Australia

New Zealand Regional Office

Level 2, 56 Parnell Road, Parnell,
Auckland 1052, Aotearoa New Zealand

Spotswood (Rail and transport) Office

Wurundjeri Country
1 McLister Street,
Spotswood 3015, Victoria

Adelaide Regional Office

Kaurna Country
Suite 702, Level 7, 80 Flinders Street,
Adelaide 5000, South Australia

Our supply chain

To be able to deliver infrastructure, rail and transport, and building and development projects that transform the lives of our communities, we rely heavily on our supply chains. In 2023, John Holland procured more than \$5.4 billion worth of goods and services from more than 8,000 direct suppliers, ranging from small businesses to multinational corporations.

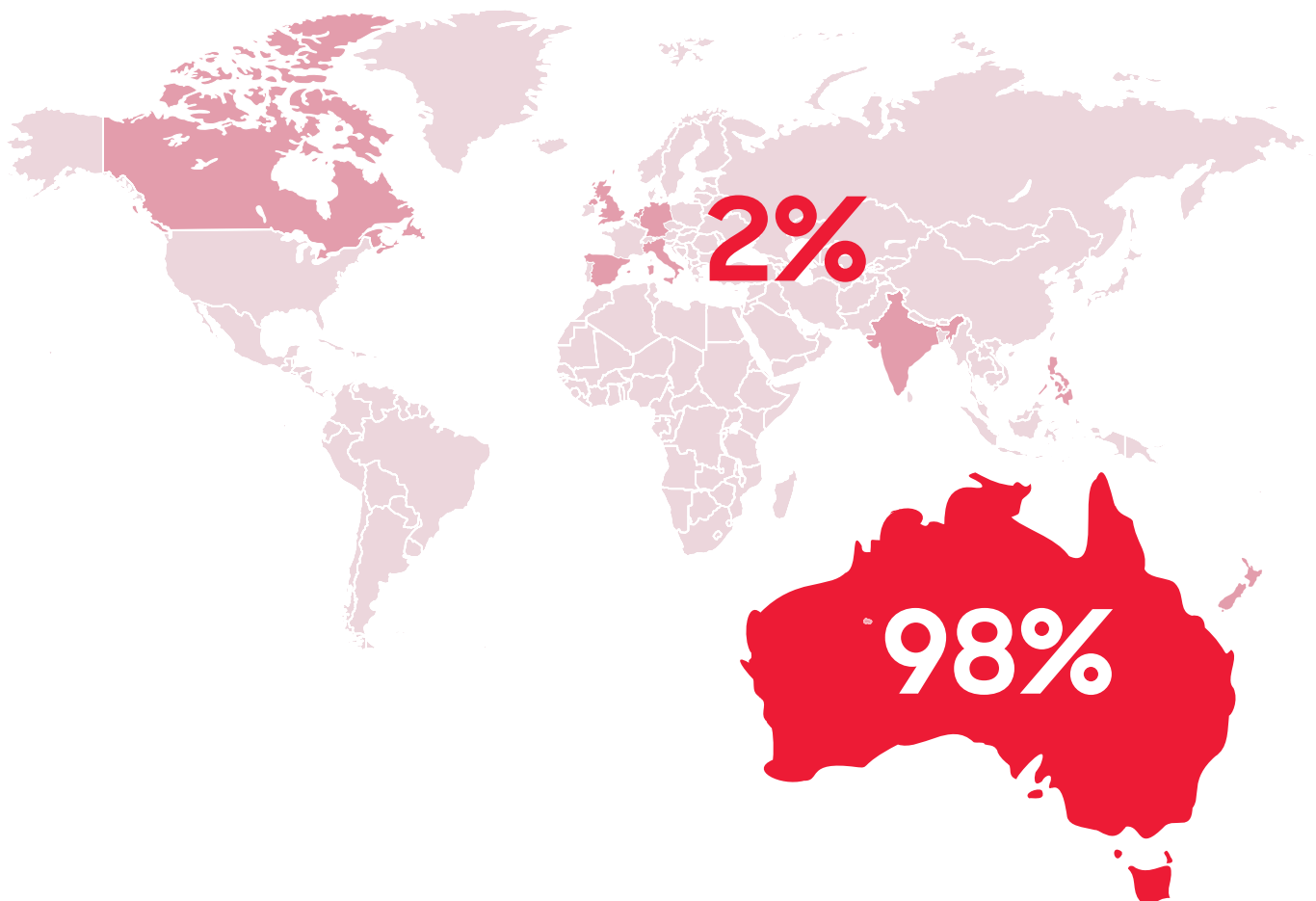
Typically, we source products and services from third parties and, although we are primarily based in Australia, our supply chains span around the globe.

In 2023, we continued our tradition of predominantly partnering with Australian suppliers, with over 7,000 local suppliers constituting 98 per cent of our expenditure.

To provide such a wide range of services and products, all of these suppliers engage with unique supply chains, often involving several levels and spanning across international borders.

While we maintain a selective engagement with international suppliers, the majority of them are located in New Zealand, benefiting from legal and regulatory alignment with Australia. Our most significant international expenditures are with suppliers in Germany, Canada, the United Kingdom and Singapore, reflecting our strategic global partnerships.

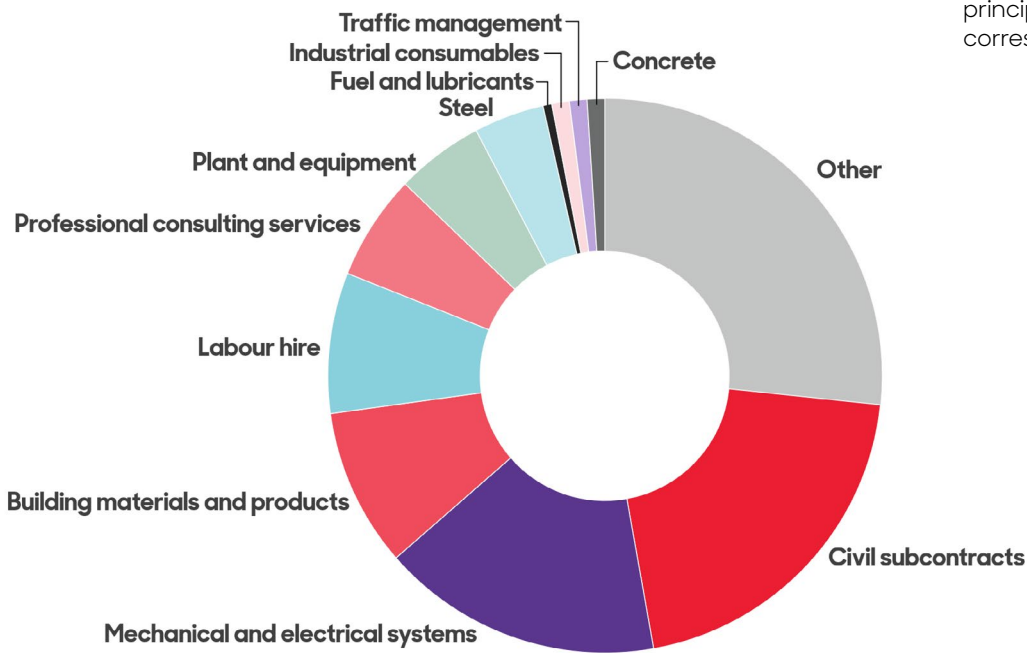
Origin of John Holland suppliers (by value)



Since 2019, John Holland has utilised a mandatory overseas inspection process to address the complexities and risks of the global supply chain. This involves a panel of reputable consulting and inspection firms which inspect international suppliers to evaluate the quality and integrity of the supply chain.

As in previous years, our biggest procurement spend category in 2023 was civil sub-contracts, with more than \$1 billion spent on services including bulk earthworks, pavements, drainage and reinforced concrete structures.

The diagram below illustrates our procurement sourcing landscape throughout 2023, pinpointing the principal spend categories and the corresponding goods and services.



Category	Category examples	% spend (by value)
Civil subcontracts	Contracts to construct bulk earthworks, pavements, drainage and reinforced concrete structures	20%
Mechanical and electrical systems	Heating, ventilation, air conditioning and control systems, electrical wiring, transformers and switchboards, and sub-components making up the systems	16%
Building materials and products	Facades, external cladding and others	9%
Labour hire	Short-term and long-term contingent labour for our projects	8%
Professional consulting services	Engineering design services, as well as environmental, inspection and construction services	6%
Plant and equipment	Hire of equipment with and without services to operate, as well as purchase of equipment like tunnel boring machines and light towers	5%
Steel	Heavy, medium and light steel products from bridge girders through to handrails and street lights	4%
Industrial consumables	Gases, welding consumables, fasteners, small tools and personal protective equipment (PPE)	1%
Traffic management	Materials and signalling, communications and control systems	1%
Concrete	Ready-mix and precast concrete, reinforcing bar and mesh	1%
Fuel and lubricants	Fuel and lubricants for plants and equipment and hydraulic oils	<1%

In 2023, we took significant steps to improve supplier relationship management, especially with our main suppliers. By enhancing the management of Framework Agreements, we aim to ensure more efficient and ethical supply chains. This approach contributes to improved communication and awareness about modern slavery risks.

By establishing closer relationships with suppliers, we also want to create a transparent environment, with better visibility throughout different tiers of suppliers where issues can be addressed promptly, leading to more sustainable and responsible business operations.

Procurement systems, procedures and policies

Our procurement systems and policies are managed by a central procurement team, which also oversees international procurements and other strategic procurement activities. Business areas across John Holland are responsible for day-to-day procurement activity and all our reporting entities and controlled entities use the same procurement policies and frameworks.

We are also involved in construction activities through joint ventures. In some cases, we act as the principal contractor for projects, being responsible for the operations of the site and execution of the project using our own processes and systems, including our policies and procedures relating to modern slavery. Where we are not the principal contractor, site operations may be managed using another entity's processes and systems. Regardless of which entity serves as the principal contractor, our joint venture partners are required to maintain high ethical standards, including compliance with our Procurement Policy and Code of Business Conduct.

In 2023, we updated our Procurement Policy to better reflect our efforts to avoid modern slavery within our supply chains and set firm standards regarding procurement practices. Our Procurement Policy now follows the recommendation of the UN Guiding Principles on Business and Human Rights (UNGPs) and states that *"John Holland will and expects all our employees, contractors and business partners to recognise, evaluate and implement measures to minimise to the greatest extent possible the risks associated with modern slavery within our operations and supply chain."*

Throughout the year, we also prepared John Holland's first Procurement and Subcontracts Manual, where we highlight the attention required to our procurement and modern slavery risk areas during our tenders, contracts, and subcontract management. This manual will be introduced in 2024.

Social procurement

Fostering opportunities through social inclusion is one of our priorities. One of the ways we do this is by including the support and increased use of direct and indirect employment through social and First Nations enterprises as part of our procurement strategy.

Certifying bodies such as Social Traders, Supply Nation and Kinaway are instrumental in linking us with certified social and First Nations suppliers, bolstering our projects and the use of local and First Nations suppliers.

Our expenditure with First Nations suppliers and social enterprises exceeded \$108 million in 2023, and we are taking steps to increase the engagement and overall spend in this area. To streamline the process, we developed an internal system to consolidate information about social and First Nations suppliers, making it readily accessible for our projects. This initiative reflects our ongoing dedication to community empowerment and responsible business practices.

We acknowledge the potential for higher modern slavery risks within First Nations supply chains. Nonetheless, our emphasis on social enterprises and local businesses enables us to mitigate these risks effectively through vigilant monitoring and due diligence.









The Social Procurement Roadshow is an event created to raise awareness about the benefits and practices of social procurement. The event was hosted in Sydney and Melbourne in 2023 and it highlights best practice, and the importance of prompt action by emphasising contractual obligations, as well as the lasting impact of procurement decisions in communities.

We are planning to create more partnerships with social and First Nations businesses, as these partnerships not only support the economic participation of First Nations communities but also contribute to a more inclusive and diverse economy.

2023 Highlights

In our 2022 Modern Slavery Statement, we outlined a number of actions to improve our outcomes in assessing and managing the risks of modern slavery.

While we are still progressing some of these, we exceeded our plan in other areas.

Action	Status
Implement an integrated, automatic vendor management system that will allow us to better control and assess risks across our supplier base	 20%
Continue to develop (and ultimately implement) an Operational Management System that will allow us to enhance our monitoring of compliance with our Supplier Code of Conduct	 20%
Continue to update our Framework Agreements and standard contracts with the requirement to comply with our Supplier Code of Conduct and modern slavery laws and practices	 60%
Strengthen the focus on recognising and avoiding modern slavery practices within our supply chain during our project launch presentations	 70%
Develop and implement a procedure for sustainable IT procurement	 80%
Include modern slavery awareness and training in periodic procurement meetings	 100%
Consultation and review of our 2022 Modern Slavery Statement with the Commonwealth Attorney-General	 100%
Update our Procurement Policy to include our stance on modern slavery	 100%

Identifying the risks of modern slavery practices in our operations

Modern slavery is defined by the United Nations as an umbrella term covering a variety of coercive and exploitative practices, such as forced labour, debt bondage, forced marriage, and human trafficking. Essentially, it refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power.

We acknowledge the inherent risks of modern slavery within the global operations of businesses, and the dynamic nature of supply chains that may evolve and present new challenges. The construction industry is susceptible to a spectrum of both overt and covert modern slavery practices.

Throughout the reporting period, our commitment to identifying and mitigating modern slavery risks has been unwavering. We have diligently worked to sharpen our awareness of the areas within our operations and supply chain that are vulnerable to these unethical practices.

In the final quarter of 2023, John Holland hosted its annual interactive workshop focusing on modern slavery risks. This event brought together key stakeholders from various departments, fostering an environment of collaboration and shared responsibility. Through this initiative, we have conducted a thorough review and evaluation of potential modern slavery risks within our operations and supply chain, reaffirming our dedication to ethical business conduct.

Prior to our modern slavery workshop, we conducted a comprehensive training session facilitated by the Supply Chain Sustainability School to deepen our understanding of these issues. This year, we expanded our outreach, inviting over 20 participants to contribute their insights, enhancing the depth and breadth of our discussions.

As outlined in the table opposite, we recognise that the construction sector can include modern slavery risks, particularly in the production of materials and provision of services in countries where there are reports of forced labour and disregard for human rights.

How we apply the continuum of involvement to our modern slavery risk assessment

The Australian Government's official guidance on the Act defines modern slavery as situations where 'coercion, threats or deception are used to exploit victims or undermine and deprive them of their freedom'. This includes practices such as forced labour, debt bondage and the worst forms of child labour.

The United Nations Guiding Principles (UNGP) on Business and Human Rights further elaborate on the concept of corporate responsibility. They outline a continuum of involvement where businesses may engage with human rights abuses, particularly modern slavery, in three distinct ways:

- 1) By directly **causing an impact** through their actions or inactions;
- 2) By **contributing to an impact** through activities that enable another entity to cause harm; and
- 3) By **association** with an impact indirectly through business relationships that are linked to operations, products, or services.

Following the Australian Government's guidelines, we use this continuum of involvement from the UNGP to scrutinise and mitigate the risks of modern slavery, ensuring appropriate support to our actions and stance against human rights violations within our sphere of influence and beyond.

The results of our risk assessment workshop are outlined in the table below. We understand that, although most of our procurement areas represent a low risk for modern slavery given our focus on local sourcing, areas of procurement that pose the highest risks of modern slavery are IT purchasing and multiple tiered sub-contractors. It was also acknowledged during the workshop that the risks for individuals subject to modern slavery include physical harm as well as other risks that impact their physical and psychological wellbeing and safety.

This continuous work, demonstrated through the developments of this Statement, reasserts our unwavering dedication to the ongoing surveillance, prevention, and reduction of any potential risks associated with forced labour or other forms of modern slavery within our supply chain operations.

Project area	Relation to continuum of involvement	2023 Risk Assessment
Bulk materials	Primary risk	Low risk, due to geographic location
Labour hire agencies		
Onshore design services		
Remote worksite camps (under John Holland control)		
Non-construction (EBA) labour		
Long distance haulage transportation	Secondary risk	Low risk, due to geographic location
Short distance transportation		
Catering suppliers for events/offices	Tertiary risk	Low risk, due to geographic location
Submission services		
Offshore waste disposal	Tertiary risk	Low risk
Site security services	Primary risk	Average risk
Cleaning services	Secondary risk	Average risk
Multiple tiered sub-contractors	Secondary risk, with migrant workers, at a higher risk	
Traffic controllers	Secondary risk	
Bitumen supply	Tertiary risk	Average risk
Offshore design services		
Imported fabricated steel		
PPE manufacture		
Site clothing manufacture		
Joint venture partner	Tertiary risk if modern slavery has been reported in their supply chain or operations	Average risk
Remote worksite camps (not under John Holland control)	Tertiary risk. Usually these services are locally sourced	Average risk
IT Purchasing	Tertiary risk. Mitigation through IT procurement process	High risk, with long and complex supply chains increasing these risks

Case study: Dexus Waterfront Brisbane

In 2023, we kicked off the first stage of construction on the Dexus Waterfront Brisbane project, which will revitalise connections between the Brisbane city and the river, creating new office spaces and retail areas and enhancing the urban landscape.

The project places a strong emphasis on sustainability and community engagement. The start of construction was marked by a cultural ceremony that united John Holland, Dexus, representatives from the Queensland Department of Aboriginal and Torres Strait Islander Partnerships, and the Turrbal people, being the Traditional Custodians of the lands and waterways where Waterfront Brisbane is being built. John Holland has also committed to recovering 90 per cent of the material that leaves site.

Apart from these initiatives, the project also serves as a great example of proactive measures taken by the project team to address and mitigate the risks of modern slavery within their operations and supply chain. The collaborative approach adopted in partnership with the client team demonstrates a structured and thorough method for assessing modern slavery.

The process began with a comprehensive workshop aimed at understanding what is modern slavery and the potential for modern slavery to affect the project. This initiative is particularly noteworthy as it reflects a commitment to social responsibility and ethical business practices. The workshop was attended by 12 representatives of John Holland and Dexus.

The next step was the evaluation of all necessary trades and developing a risk rating scale from 1 to 20+, balancing the likelihood of modern slavery and our ability to access and influence the relevant suppliers and their supply chain. Trades that scored 10 or above were then targeted for further assessments. This threshold is a critical component of the project's risk management strategy, ensuring that high-risk areas receive the attention they require during the procurement process.

In total, from almost 50 activities, nine trades were identified with scores above the threshold. Some of the high-risk areas highlighted by the project were ceilings and partition labour, and the supply of structural steel, furniture, tiling and stonework materials, and riverwalk pile.

To address these risks, a six-step procedure was created, emphasising the team's dedication to implementing practical solutions. These steps involve enhanced scrutiny of supply chain partners, increased transparency, and the introduction of clear accountability mechanisms with established follow-ups.

Another significant measure that emphasises the project's commitment to combating modern slavery is the addition of a more stringent modern slavery clause in all project subcontracts. By enhancing due diligence, warranties and termination rights, the project sets an even higher standard for compliance and ethical conduct.

Waterfront Brisbane project



Finally, since site handover in January 2023, awareness posters have been displayed in high-traffic areas of the project to educate workers about modern slavery. The posters encourage individuals to report any concerns to the confidential service or visit the website. They highlight signs of modern slavery, such as forced labour without pay, lack of personal documents, excessive working hours without breaks, and restricted freedom of movement.

Overall, the Waterfront Brisbane project’s approach to modern slavery is a robust framework that could serve as a model for other projects seeking to ensure compliance with modern slavery legislation and ethical supply chain management practices. It reflects a growing awareness and responsiveness to the complex challenges posed by modern slavery in the construction industry and beyond.

Poster used in the sites of Waterfront Brisbane



Case study: IT Procurement

Every year, we spend an average of \$6 million on IT equipment to support our projects, offices and people. This equipment ranges from laptops to screens, network equipment and accessories.

The manufacturing of IT hardware presents a dual challenge of ethical labour practices and environmental sustainability. Technology firms are part of complex supply chains that involve logistical hurdles as well as other issues such as conflict mineral sourcing and unlawful labour conditions, which indicate a higher risk of modern slavery.

In 2023, our IT department has pioneered developing a Sustainability Assessment and Rating Framework to ensure that our IT equipment suppliers adhere to ethical, environmental and social standards. This initiative, developed initially for IT procurement, places a significant emphasis on sustainability, accounting for 60 per cent of the overall evaluation criteria for new technologies and services. This approach marks a departure from traditional assessments that prioritised only cost and features, shifting the focus towards environmental and social responsibility.

Our goal is to partner with the most sustainable entities in the market, ensuring that our operations not only foster environmental stewardship but also enhance productivity and value across all business areas. In line with our Supplier Code of Conduct, we are committed to engaging with suppliers that demonstrate a strong commitment to sustainable practices, ensuring greater responsibility within the IT supply chain.

A key aspect of our sustainability framework is the rigorous scrutiny of modern slavery practices, aligning with international standards such as the UN Global Compact Initiative, the Disability Equality Index (DEI) and the Human Rights Campaign Index (HRCI). Suppliers found to be in violation of human rights or lacking robust anti-slavery policies will face deductions in their sustainability score, reinforcing our dedication to ethical business practices and partnerships with certified "Eco Partners" who reflect our values and commitment to sustainability.



Our actions to assess and address modern slavery risks

Our goal is to operate our business with integrity and effectiveness, maintaining our status as a responsible corporate entity.

We have implemented several measures to evaluate and mitigate the risk of modern slavery within our business practices and supply chain. A detailed account of these measures follows.

Assessing potential risks

In 2023, we increased the range of attendees at our annual interactive Modern Slavery Risk Workshop by including not only our key functions from across John Holland and key operational areas (including relevant controlled entities and joint ventures) but also project procurement teams, aiming to broaden our scope of information and accountability. This workshop contributes to the identification of possible risk areas and informs the development of action items to further strengthen our response.

Setting clear standards for our people

Code of Business Conduct

Our [Code of Business Conduct](#) is based on our values, policies, procedures and applicable laws guiding our daily work and demonstrates our commitment to uphold proper and ethical business practices, including in relation to modern slavery. It also sets out our commitment to prevent modern slavery in our supply chain.

Our Code of Business Conduct makes it clear that we respect the human rights and dignity of all employees, the communities in which we work and those who are affected by our projects and operations. It also reinforces our zero-tolerance approach to all forms of modern slavery.

The Code of Business Conduct applies to everyone who works for or with us, including people working under contract. We require our employees and labour hire contractors to comply with it and our Board, executives and all employees must also complete a mandatory e-learning module about the Code of Business Conduct during induction and every two years thereafter. Where we have a controlling position in a joint venture or other similar arrangement, we require that the standards of behaviour contained in our Code of Business Conduct be adopted as a minimum.

Investigations into potential breaches of the Code of Business Conduct are monitored by our Governance, Compliance & Audit Committee.

Procurement Policy and Manual

Our Procurement Policy was updated in 2023 to directly address the risks of modern slavery and raise awareness about our stance in this matter. Our revised policy is now clear about our commitment to ethical practices and the protection of human rights. In line with our revised policy, we are in the final stages of publishing our Procurement Manual that will establish the clear steps to be taken to avoid such risks within our supply chain.

Setting clear standards for our suppliers

Our [Supplier Code of Conduct](#) clearly outlines our expectations for suppliers to responsibly manage their supply chains. Since introducing modern slavery compliance clauses in 2022, we have mandated adherence to modern slavery laws and our Supplier Code of Conduct, which includes the implementation of relevant policies and due diligence within their own supply chains. Non-compliance with these clauses may lead to stringent measures, including potential termination of contracts.

A Supplier Code of Conduct online [training module](#) is available on our website, allowing our suppliers increased understanding of the minimum requirements related to modern slavery.

Managing supplier risks

Our Procurement Policy commits us to 'efficient, effective, ethical and sustainable procurement' and sets out our expectation that all of our employees, contractors and business partners including suppliers will uphold ethical business practices and abide by relevant legislation. We also expect that all of our employees, contractors and business partners 'recognise, evaluate and implement measures to minimise to the greatest extent possible the risks associated with modern slavery within our operations and supply chain'.

One of the ways we manage risks associated with our procurement is by inspecting all our international suppliers (which are considered to have a higher exposure to modern slavery risks when compared to local suppliers), as described on page 13, and requiring international suppliers to complete a modern slavery questionnaire and deed poll during the tender process. This sets out a range of modern slavery requirements, including an obligation for the supplier to inform us of actual or suspected modern slavery incidents in its operations and supply chain.

Our project efforts

Some of our projects have reinforced our commitment to ethical supply chain management through the implementation of a comprehensive assessment template during supplier selection. This non-financial evaluation, used by projects such as Sydney Metro West - Eastern Tunnelling Package, Upper South Creek and M7-M12 Integration Project, includes questions related to modern slavery, enabling us to prioritise high-risk areas and focus on suppliers who fail to provide adequate responses.

Additionally, the M7-M12 Integration Project team enquires whether suppliers have a Modern Slavery Policy and actively manage related risks within their own supply chain, requesting specific examples. Responses guide the extent of due diligence conducted.

On the Upper South Creek Advanced Water Recycling Centre in Sydney, the project team held feedback sessions with unsuccessful suppliers to explain the importance of John Holland's position on modern slavery and will step up due diligence measures according to risk, such as the recent purchase of solar panels.

These clear standards facilitate regular audits of key suppliers, with in-person reviews being a critical aspect of our risk management strategy. During 2023, several in-person audits were conducted by our teams, including one in-person audit performed in a Chinese manufacturing plant performed by one of our mechanical engineers, allowing us to directly assess and advise on supplier practices and suggest improvements if needed.

Strengthening our supplier management system

In 2023, the digitisation of procurement processes continues to be a key initiative, with a particular focus on our systems for comprehensive risk assessments of direct suppliers, including modern slavery risks. We also continue to work on enhancements in recognising certified local and First Nations suppliers through an automated linkage with certifying partners, bolstering project efficiency and supplier management.

Finally, we made substantial progress in enhancing our supplier relationship management, particularly with key suppliers. This strategy has been instrumental in improving communication and elevating awareness regarding the risks of modern slavery. Furthermore, by nurturing more intimate connections with our suppliers, we cultivate an atmosphere of transparency. This ensures greater oversight across various supplier tiers, enabling swift resolution of issues and promoting business practices that are both sustainable and responsible.

Maintaining a whistleblower mechanism

Our whistleblower mechanism provides a safe and anonymous way for any of our employees, contractors, suppliers and other stakeholders to report potential breaches of our Code of Business Conduct, Supplier Code of Conduct and applicable laws, including in relation to modern slavery. Written or verbal reports can be made through an independent and anonymous Speak Up Line or directly to the Company Secretary and Corporate Counsel, or the Privacy Officer.

Our [Whistleblower Standard](#) is available on our website, and clearly explains:

- to whom and how reports may be made, including relevant email and contact phone numbers;
- the protections available (such as confidentiality of identity and protection against victimisation);
- how we will support whistleblowers and protect them from detriment;
- how we will investigate reports, which are overseen by the Company Secretary and Corporate Counsel and the GCA Committee;
- how we will ensure fair treatment of employees involved; and
- how the Whistleblower Standard is communicated.

Fortunately, since the implementation of this mechanism, no reports have been received relating to modern slavery or labour rights more broadly. While pleased with this result, we recognise modern slavery incidents may not always be reported through whistleblower mechanisms, including where potential complainants may have difficulty accessing the mechanism due to lack of awareness or language barriers. To address this, we promote the whistleblower and grievance mechanisms to our employees through emails, intranet posts and an FAQ document, as well as to external stakeholders through the John Holland website. Both our Code of Business Conduct and Supplier Code of Conduct also include information about accessing our whistleblower and grievance mechanisms.

Further details on how we would respond to a modern slavery incident are set out on the following page.

Filling gaps previously identified

In 2020, we engaged a business and human rights advisory firm (Pillar Two) to undertake a gap analysis of our policies and processes relating to modern slavery and developed a three-year roadmap for action.

During 2023, we continued to implement the roadmap and addressed the following key recommendations:

- including a direct mention of our commitment to fight modern slavery within our Procurement Policy;
- increasing awareness about modern slavery through employee and supplier training; and
- continuing to engage with new key stakeholders that can provide insights into modern slavery risks.

Additionally, during our ongoing dialogue on best practices and legal compliance, we were privileged to have our 2022 Modern Slavery Statement formally reviewed by the Commonwealth Attorney-General. We have integrated numerous suggestions from this assessment into this Statement, reflecting our commitment to continuous improvement and increased transparency.

Collaborating with our partners

Our collaboration with business partners through the Infrastructure Sustainability Council (ISC) Road Sector Modern Slavery Coalition remains steadfast in addressing modern slavery. The Coalition is dedicated to fostering joint efforts in risk management, promoting best practices for compliance, and enhancing its members' ability to tackle modern slavery risks.

During the reporting period, our focus was on assessing modern slavery risks alongside Coalition partners and pinpointing areas for improvement. We engaged in discussions with suppliers to learn about their actions and remediation strategies. We had a special session to better understand the modern slavery risks related to Australian bitumen, an important material used in the construction industry, especially in asphalt. The presentation was enlightening, especially considering the lack of visibility about lower tiers of the supply chain usually granted by suppliers. Additionally, we investigated the potential to implement a supplier evaluation rating system that could be used either as a consortium or as individual organisations. These discussions and refinement will continue in 2024.

Responding to modern slavery incidents

Should a potential instance of modern slavery be identified within our operations or supply chain, this would be treated seriously and a proper and thorough investigation would be undertaken in accordance with our established policies and procedures, including the Code of Business Conduct and/or Whistleblower Standard.

Depending upon the potential severity of the incident, pursuant to our crisis management framework and response plans, our Executive Crisis or Incident Management Team may activate based on the consequences of the situation and the severity of those consequences, which allows for a proportionate and focused response. Our protection priorities and company values will ensure that the necessary support is provided to those individuals affected and their families, such as counselling, financial and/or legal support.

We are investigating potential formal remediation measures and services, with further details contained in Section 04.

Our Supplier Code of Conduct

Our Supplier Code of Conduct explains our expectations of our suppliers, their subsidiaries and supply chain, and applies to every organisation or individual that provides us with goods or services. We expect our suppliers to provide their workers with appropriate training and support to enable them to comply with the Code, which also sets clear expectations for the whole supply chain to align with it.

Among other requirements about ethical business practices, the environment and the community, the Code requires that all suppliers must:

- prohibit the use of modern slavery (including forced labour) and child labour in their operations and supply chains, and take proactive steps to manage potential risks; and
- provide means for their workers to safely and anonymously make complaints relating to unsafe or unfair working conditions (including modern slavery or other exploitation), either through their own grievance mechanism or by accessing John Holland's whistleblower mechanism. Workers must not be exposed to retaliation or fear of retaliation for making a complaint.

The Supplier Code of Conduct is part of every supplier's standard contract. Acknowledging and agreeing with it is a mandatory part of the contracting process with us. By including this important step in our processes, we expect our suppliers to act and also to demonstrate leadership by going beyond the requirements of the Code.



How we raise awareness about modern slavery

Raising awareness about modern slavery is a critical step in combating this global issue. During 2023, we continued with our commitment by expanding our communication channels in relation to modern slavery.

Project kick-offs

At the start of all new projects and the onboarding of a new procurement team, Strategic Procurement plays a crucial role in promoting ethical practices by incorporating awareness of modern slavery into our project kick-off presentations. This initiative ensures that team members are educated on the importance of ethical sourcing and the impact of their procurement decisions. By doing so, we foster a culture of responsibility and vigilance that extends beyond the company, contributing to the global fight against modern slavery.

Procurement cohort

In 2023, Strategic Procurement initiated bi-monthly meetings with procurement teams across the company with the focus of establishing open communication channels. These meetings allow for project teams to stay informed, ask questions and keep updated about corporate best practices. Modern slavery was covered in detail during two of these meetings in 2023, including a training session provided by the Supply Chain Sustainability School.

Modern Slavery Working Group

In 2020, we formed a Working Group comprised of key stakeholders from the People, Strategic Procurement and Corporate Governance teams. In 2023, we increased the frequency of meetings of our Working Group which played a crucial role in addressing modern slavery at John Holland. As part of our increased discussions on best practices and compliance with legislation, we had access to a formal review of our 2022 Modern Slavery Statement by the Commonwealth Attorney-General. Many of the recommendations from this review have been incorporated into this Statement. The activities of the Working Group provides a collaborative platform for members to share experiences and strategies, and ensure continuous progress and follow-up on related activities.

Supply Chain Sustainability School training

Understanding the complexities of modern slavery is crucial for businesses to better safeguard human rights and contribute to a more sustainable and responsible global market. With that in mind, the Supply Chain Sustainability School provided a specific training session during our Modern Slavery Risk Assessment Workshop. This training was a crucial step before conducting a modern slavery risk assessment, as it equipped members with the necessary knowledge to identify and address the risks within our operations and supply chain.

Case study: Women and girls are most vulnerable to modern slavery – how we are mitigating the risks

Women and girls are uniquely vulnerable to becoming victims of modern slavery and are estimated to comprise over half (54 per cent) of modern slaves globally.²

We are committed to empowering women and addressing the historically entrenched disadvantage faced by women at work. We support gender equity across our organisation and beyond by continually reviewing and enhancing our own practices while acting as a role model to drive change across the broader construction sector.

We are midway through the implementation of our Gender Equality Strategic Plan (2021–2025). In 2023, some of our gender equality achievements included:

- **Gender pay equity review:** we completed our annual gender pay equity review, which assessed company-wide remuneration levels to understand the extent of, and help define actions to address any organisational gender pay inequity. Additionally, we are working to close our gender pay gap. In 2022–2023, we reported a 2.9 per cent reduction in the average gender pay gap relative to 2020–2021 levels, a positive change which can be attributed to the promotion of women into senior leadership positions and recruiting more female employees. Our target is a further 2 per cent reduction in the gender pay gap by 2025.
- **Updating our Family and Domestic Violence (FDV) Policy** to improve access and support for individuals experiencing FDV, including additional financial and accommodation (emergency relief voucher to the value of \$300 and up to five nights' accommodation for employees and their dependents), supporting flexible working arrangements, offering a change of work mobile number, and providing specialist Employee Assistance Program support.
- **Miscarriage and infant loss:** we offer two new compassionate leave entitlements for miscarriage and infant loss, including two weeks of paid leave for employees who have experienced miscarriage and eighteen weeks of paid leave for employees who have experienced the loss of a child aged between birth and two years of age.
- **Promoting gender equality through our sphere of influence, including updating our Supplier Code of Conduct** to help drive gender equality throughout our supply chain. Our updated Supplier Code of Conduct now requires suppliers to commit to *'make all efforts to create gender equality, comply with the Workplace Gender Equality Agency (WGEA) Act and to look for opportunities to boost equality within business. This includes working towards equity in remuneration, training and development and career pathways.'*

We also continued to implement our range of people standards, policies, procedures, and assistance programs, which provide a framework for a safe and respectful work environment for people of all genders.

We are proud to have achieved the *2022–2024 WGEA Employer of Choice citation for Gender Equality* in recognition of our work and actions in enhancing gender equality and advancing women's interests in the workforce.

² International Labour Organization, Walk Free and International Organization for Migration (2022), *Global Estimates of Modern Slavery*, Geneva, ISBN: 978-92-2-037483-2, p. 19.



Assessing our effectiveness and future plans

We are committed to the constant improvement of our strategies to manage the risks of modern slavery. To do so, we are making our plan stronger and smarter.

Assessing the effectiveness of our actions is a key element of our commitment to continuous improvement. We assess the effectiveness of our approach in a number of ways, including by:

- monitoring and analysing data from our key indicators, such as the number of modern slavery related reports made through our whistleblower mechanisms and the number of modern slavery questionnaires and deed polls completed by international suppliers;
- reviewing all overseas inspections performed with international suppliers;
- considering how our response compares to good practice responses from business peers in our sector and more broadly, including through the ISC Coalition; and
- evaluating whether our policies are fit for purpose, including through processes such as the modern slavery gap analysis (see page 23 for further details).

Our goal is to continue the progress in our response to modern slavery.

Our main initiatives for 2024 are across four main pillars, as described opposite.



Improved supplier performance and awareness

Implementing an integrated, automatic vendor management system that will allow us to better control and assess risks across our supplier base and continuing to develop (and ultimately implement) an Operational Management System (OMS)

John Holland is transforming its operational management systems, which will mean a more integrated approach to the management of our partners and suppliers. Having all relevant information concentrated in a single system will help our people better understand and manage potential risks, ensuring that suppliers adhere to ethical standards and regulations. Furthermore, the development of an OMS is instrumental in reinforcing these efforts, as it allows for improved monitoring of compliance with the Supplier Code of Conduct. Such systems are essential for maintaining ethical supply chains and preventing modern slavery by providing transparency and accountability in supplier operations.

Considering the implementation of a risk-rating assessment evaluation system before initiating new partnerships, with continuous monitoring and reporting through a specific tool

Implementing a risk-rating assessment evaluation system will allow us to gauge the potential risks associated with new partnerships, ensuring that ethical practices are in place from the outset. Continuous monitoring and reporting will also provide an ongoing review mechanism, with the establishment of KPIs, enabling us to detect any issues that may arise over time.



Focus on knowledge, awareness and capacity building

Developing and implementing modern slavery project-specific workshops

We have projects spread across Australia and New Zealand, each with different requirements and specific criteria. To deal with such singularities, project-specific workshops on modern slavery are crucial tools in the fight against this global issue. We aim to provide targeted education and training for our people, equipping them with the knowledge to identify and respond to potential instances of modern slavery within their operations and supply chains. By focusing on the specific needs and risks of a project or sector, these workshops foster a proactive approach, ensuring that all stakeholders are aware of their responsibilities under modern slavery legislation and are prepared to take action to mitigate these risks. Such initiatives not only raise awareness, but also contribute to a culture of compliance and ethical practice.

Supporting and increasing access to the Supplier Code of Conduct online training during contracting and onboarding of suppliers

Accessing and understanding our Supplier Code of Conduct ensures that suppliers are aware of the ethical standards and legal requirements related to labour practices. By incorporating the Supplier Code of Conduct training module during the contracting and onboarding process, we aim to promote a culture of compliance and responsibility. This proactive approach helps to identify and mitigate risks associated with modern slavery in our supply chain, fostering a commitment to ethical business practices and human rights.



Stronger governance

Creating and implementing a Modern Slavery Procedure

Our Modern Slavery Procedure will outline the steps and measures we take to identify, prevent, and address the risks of modern slavery within our operations and supply chain. Moreover, this procedure aims to support ethical business practices and enhance corporate reputation by demonstrating a commitment to human rights and the wellbeing of individuals in all aspects of our business operations, providing clarity and specific guidance to our people.



Collaboration for remediation

Engaging with organisations involved in modern slavery remediation

We understand that collaboration through engagement with organisations dedicated to remediation is crucial in the fight against modern slavery. These organisations work tirelessly to address the complex challenges of modern slavery, offering guidance, support and resources to companies seeking to eradicate this issue from their operations and supply chain. Initiatives such as the 'Modern Slavery Response & Remedy Framework' by Walk Free provide practical steps for companies. We want to further these steps by deepening our engagement and preventing future exploitation. By partnering with such organisations, our goal is to have a significant impact in the global effort to abolish modern slavery.

Consultation and approval

This Statement was developed by the Working Group, which also considered the advice provided by the Commonwealth Attorney-General in relation to our 2022 Modern Slavery Statement, and general advice provided by Pillar Two on 'best practice' approaches to Modern Slavery Statement disclosures.

This involved consultation with each of the reporting entities covered by the Statement (as listed in Appendix B) and other relevant controlled entities. The Chief Commercial Officer and the Chief Financial Officer & Company Secretary also reviewed this Statement.

The Statement has been reviewed by one or more directors from each reporting entity and each controlled entity.³ Each reporting entity also shares a common Company Secretary, who was actively involved in the drafting of this Statement.

The Board of John Holland Group Pty Ltd approved this Statement on 18 June 2024.



Joe Barr

Director and Chief Executive Officer

28 June 2024

³ Directors may serve on the boards of multiple entities within the John Holland group.

Appendix A

How this Statement addresses requirements of the Act

Legal requirement	Reference in this Statement
Identify the reporting entity	'About this Statement' (page 4) and Appendix B
Describe the reporting entity's structure, operations and supply chains	Section 01 Appendix B
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Section 02
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	Section 02 Section 03
Describe how the reporting entity assesses the effectiveness of such actions	Section 04
Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement	Section 05
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Throughout this Statement

Appendix B

Table of reporting entities

Reporting entity	Description
CCCI Australia Pty Ltd (the head Australian entity)	CCCI Australia Pty Ltd is an entity formed by CCCC International Holding Limited to hold its Australian business interests and operations. The entity has no active operations and no subsidiaries other than John Holland Holdings Pty Ltd.
John Holland Holdings Pty Ltd	John Holland Holdings Pty Ltd is an entity formed by CCCC International Holding Limited as the holding entity for the John Holland Group. The entity has no active operations and no subsidiaries other than John Holland Group Pty Ltd.
John Holland Group Pty Ltd	John Holland Group Pty Ltd is the main head entity for the John Holland Group. It is the employing entity for all staff ('white collar') employees. It also provides funding and treasury services to all group entities and operations.
John Holland Pty Ltd	John Holland Pty Ltd is the principal Australian operating entity for construction contracting services.
John Holland Queensland Pty Ltd	John Holland Queensland Pty Ltd is the operating entity for construction contracting services in Queensland.

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