

**TUTT BRYANT GROUP LIMITED**

*A Member of Tat Hong Holdings Ltd*



# MODERN SLAVERY

STATEMENT 2020

**EQUIPMENT SALES**

**HIRE**

**HEAVY LIFT & SHIFT**

**UNDER THE ONE HOOK**



# TABLE OF CONTENTS

06.	Our Approach
10.	Our Structure, Operations and Supply Chain ( <i>Criterion 1 and Criterion 2</i> )
14.	Risk Assessment and Mitigation ( <i>Criterion 3 and Criterion 4</i> )
16.	Due Diligence and Remediation Processes ( <i>Criterion 4</i> )
18.	Measuring Effectiveness ( <i>Criterion 5</i> )
19.	Stakeholder Engagement and Consultation ( <i>Criterion 6</i> )
20.	Looking Forward ( <i>'other' – Criterion 7</i> )
21.	Board Approval and Acceptance



# FY 2019-20 HIGHLIGHTS



Implementation  
of a Human  
Rights Policy



Roll out of  
Whistleblowing and  
grievance mechanisms



Creation of a  
Modern Slavery  
working group



No high-risk areas  
were identified  
throughout our group  
and supplier networks





## A WORD FROM OUR MANAGING DIRECTOR

“ There are five values that are central to our culture and beliefs, upon which all activities associated with the Group are underpinned. They are: *Teamwork, Family, Integrity, Versatility and Enterprising.* ”

The Tutt Bryant Way encapsulates the Vision, Mission and Values of Tutt Bryant Group. There are five values that are central to our culture and beliefs, upon which all activities associated with the Group are underpinned. They are: **Teamwork, Family, Integrity, Versatility** and **Enterprising**.

With a lineage in the Australian construction industry that stretches over 80 years, Tutt Bryant does not condone abuses or violations of any kind to basic human rights, even if they may be convenient at the time or may lead to short-term gains. We understand our social responsibility transcends dollars and cents, and that the Group's long-term sustainability can only be assured by upholding our core Values and by running our business responsibly and ethically.

While globally complex, the issue of forced labour and the exploitation of vulnerable workers is real and entirely relevant to Tutt Bryant.

We are part of the regional organisation, Tat Hong Holdings Ltd, and we also work closely with a variety of international counterparties, including suppliers of capital equipment, spare parts and ancillary items. It is therefore imperative that Tutt Bryant does its part to identify and address any potential or actual violations of human rights and incidents of modern slavery in any part of our business or supply chains.

Across the globe, many established economies have accepted their responsibilities in relation to the eradication of modern slavery and human rights abuses. In Australia, the *Modern Slavery Act 2018* (Cth) came into effect on 1 January 2019. Tutt Bryant welcomes and supports the introduction of this legislation and its reporting requirements.

Our Corporate and Legal Team are collaborating with all three operating divisions to embed the overall commitment and requirements to act against modern slavery and human rights abuses, where they are identified in our business and supply chains.

This statement outlines the steps taken by Tutt Bryant Group during the financial year ended 31 March 2020 in compliance with the *Modern Slavery Act 2018* (Cth). It is noted that part of the reporting period covers the current COVID-19 pandemic, which has severely impacted many of our operations and supply chains. The long-term effects are still to be known but Tutt Bryant is committed to ensuring the same principles are maintained and continuing our efforts in this important area.

**Chen Wei Ng**  
Managing Director





# OUR APPROACH

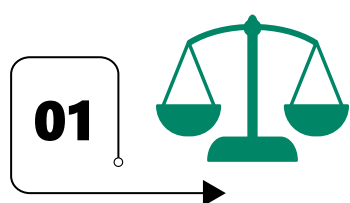
This is our first statement and it describes our commitment to the requirements of the *Modern Slavery Act 2018* (Cth).

It outlines Tutt Bryant's actions taken to identify, address and report the existence of modern slavery practices, as well as any breach of human rights in our operations, and supply chains existing within Tutt Bryant Group Limited and its consolidated entities for reporting purposes ("Tutt Bryant").





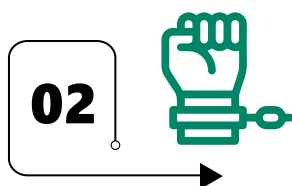
## OUR PRIORITIES THROUGHOUT 2019/2020



01

### HUMAN RIGHTS POLICY

Develop and establish a Human Rights Policy outlining our commitment to prevent and report any negative impacts on human rights within our business activities.



02

### MODERN SLAVERY ACT

Develop and broaden our understanding of the *Modern Slavery Act 2018* (Cth) and the requirements therein.



03

### HIGH-RISK AREAS

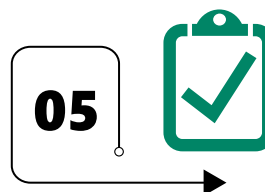
Identify any high-risk areas requiring urgent attention and subsequent mitigation.



04

### SUPPLY CHAINS

Develop an understanding of any modern slavery risk areas within our supply chains and operational activities.



05

### DUE DILIGENCE REPORT

Apply current grievance and reporting (Whistleblowing) mechanisms to the due diligence processes undertaken in compliance with the *Modern Slavery Act 2018* (Cth).

# PROGRESS AGAINST OUR SHORT-TERM PRIORITIES



Our **Human Rights Policy** was developed, implemented and communicated to the operating divisions in early 2020. All employees, contractors and customers have access to this policy either directly through their business channels or via our website [www.tuttbryant.com.au](http://www.tuttbryant.com.au)



Senior leaders of Tutt Bryant met throughout the reporting period to discuss the commencement of the *Modern Slavery Act 2018* (Cth) and reporting requirements. Strategy discussions were held throughout the reporting period to determine the group's initial approach to addressing modern slavery risks and how best to raise awareness throughout our business networks and supply chains.



A **Modern Slavery working group** was established to identify approaches for developing risk assessment and mitigation mechanisms within our supply chains and operational activities. This group also assisted in the development of our first Modern Slavery Statement.

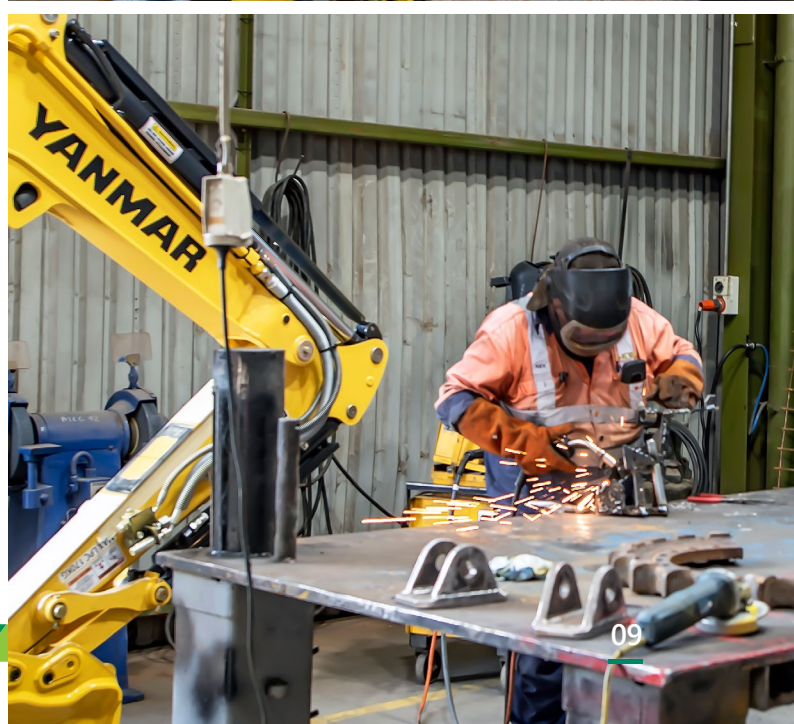
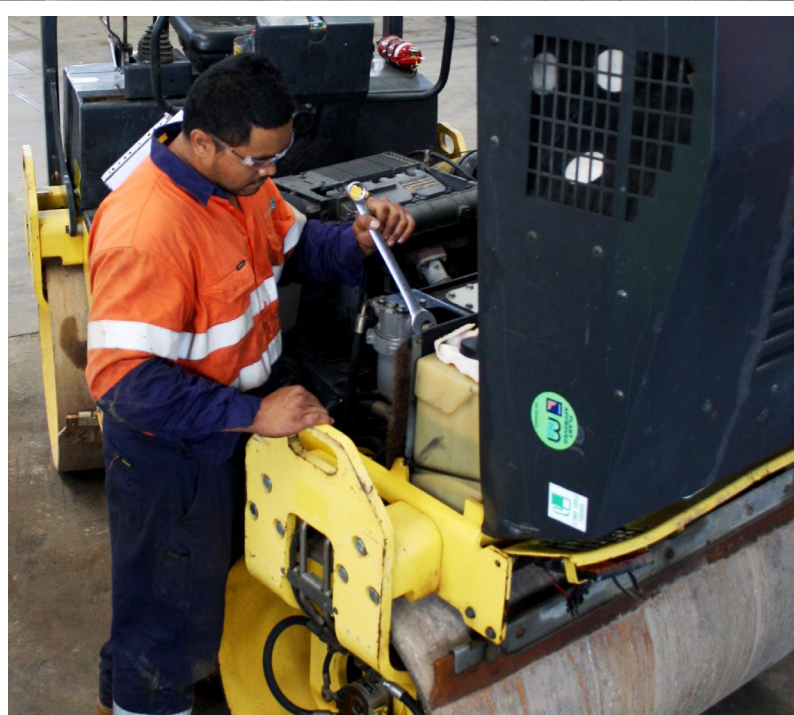


Key members of our Modern Slavery working group attended several **Modern Slavery Act/Reporting obligations public Workshops and Webinars** to gain further exposure to the expectations and subsequent requirements under the reporting regime.



**No high-risk areas were identified** throughout our group or supplier networks that required urgent attention or mitigation.







# OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

## 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. It is an industrial services organisation providing sales, hire, parts, service and engineering solutions to the construction, mining, engineering and trades sectors throughout Australia. 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.

Since its humble beginnings in 1938 as a manufacturer and supplier of earthmoving and

construction equipment, Tutt Bryant has grown to be a diverse organisation operating in three distinct areas: **① Equipment Sales & After-Sales Support, ② General Equipment Hire and ③ Cranes, Heavy Lifting & Specialised Transport.**

We employ approximately 500 employees across nearly 30 locations nationally. As part of Tutt Bryant's lineage and ethos, its people and honest dealings underpin how the group conducts its business, enabling continued growth and development of all stakeholders.

Our philosophy is expressed clearly in the Tutt Bryant Way, which is embraced by all our employees.





## TUTT BRYANT GROUP STRUCTURE

TUTT BRYANT GROUP LIMITED (ACN 009 242 675 / ABN 89 009 242 675)

Tutt Bryant Finance  
Pty Ltd T/AS  
**Tutt Bryant Finance**  
(ACN 626 060 466)  
50% Joint Venture

T/AS **Tutt Bryant  
Heavy Lift & Shift**

Muswellbrook Crane  
Services Pty Ltd T/AS  
**Tutt Bryant Heavy  
Lift & Shift**  
(ACN 001 037 387)

BT Equipment Pty Ltd  
T/AS  
**Tutt Bryant Equipment**  
(ACN 094 476 141)

Tutt Bryant Hire  
Pty Ltd T/AS  
**Tutt Bryant Hire**  
(ACN 087 847 489)

## 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 a number of global brands in Australia. In addition to capital equipment sales, Tutt Bryant Equipment supports its customers in the provision of spare parts, consumables, mechanical service, repairs and other support functions.

**TUTT BRYANT  
EQUIPMENT SALES**



**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 the construction, mining, engineering and trades sectors across Australia. 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  
EQUIPMENT HIRE**



**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  
HEAVY LIFT & SHIFT**



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

**TUTT BRYANT  
FINANCE**





## OUR LOCATIONS



## OUR PHILOSOPHY “THE TUTT BRYANT WAY”

### OUR VISION

**HOOKING UP TO SUCCESS.**

### OUR MISSION

**TO UPLIFT**

**Our customers** with quality equipment, service and support.  
**Our people** in a safe, positive and family oriented environment.  
**Our stakeholders** by ensuring long-term sustainability and growth.

### OUR VALUES

**Teamwork** - We work as a team under the one hook.  
**Family** - We care for our people, customers, communities, safety and the environment.  
**Integrity** - We are fair, respectful, and accountable in our conduct.  
**Versatility** - We are resourceful and adaptable to changing needs and situations.  
**Enterprising** - We take initiative and challenge conventional thinking.

## OUR SUPPLY CHAIN

Our supplier relationships are generally with organisations in developed economies with minimal engagement in emerging ones. We have had some procurement from suppliers in market competitive countries such as China, however, to date this has only been on a minimal basis. When measured by value, most of our payments are made to suppliers in Australia, Japan, Finland, Italy, United States of America and to our parent company based 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 Group 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. Extra caution is also to be taken in 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.

“ Our supplier relationships are typically long-term and have been established for many years, with some surpassing 40 years. ”





# RISK ASSESSMENT AND MITIGATION



We have undertaken a formal due diligence process across the reporting period to identify and assess potential risks of modern slavery practices across our operations and supply chains in response to the passing of the *Modern Slavery Act 2018* (Cth).

For this statement we have focused on identifying any high-risk areas that may require immediate attention and mitigation. For the identification of

high-risk areas we considered a number of factors including: the sector, industry, types of products and services, spend per annum and geographic location. We also considered risks that may possibly cause, contribute and/or be linked to modern slavery practices, in accordance with the Australian Government's Department of Home Affairs (2018) 'Guidance for Reporting Entities'.

To assist us in minimising our risk of involvement with modern slavery, we utilise tools and information available to strengthen our risk assessment program.

The information and resources we have used this year include the Global Slavery Index, the Global Compact Network, TRACE International, the Transparency International Corruption Perceptions Index, and the Modern Slavery Registry.

Tutt Bryant considers the risk of modern slavery within its direct business operations to be low. However, we recognise that through our supply chains and customers, we can be indirectly exposed to modern slavery.

An area of concern within our business is the procurement of minor components, low value items and uniforms. Due to the level of competition in commodity markets where price is a key driver of sales, it is acknowledged there is an increased risk of these items containing an element of substandard modern salary conditions and those employed in these areas may also be subject to other areas described in the definition of modern slavery.

At Tutt Bryant we have isolated an example of this to be corporate promotional items that are not directly sourced from overseas but through an intermediary supplier in Australia. To assist us in mitigating our risks, we plan to update our standard contractual terms to expressly include a modern slavery clause requiring our suppliers to comply with modern slavery legislative requirements and have these issued to all suppliers or alternately written into supply contracts.

Further steps we have taken to assess and mitigate risk in our supply chains include consideration of human rights indicators, engaging suppliers that have internal policies and procedures to address workers' labour and payroll conditions and have adequate workplace practices in place to mitigate exposure to modern slavery principles; and maintaining supplier relationships where modern slavery risks are low.

“

*To assist us in mitigating our risks, we plan to update our standard contractual terms to expressly include a modern slavery clause requiring our suppliers to comply with modern slavery legislative requirements and have these issued to all suppliers or alternately written into supply contracts.”*

”



# DUE DILIGENCE AND REMEDIATION PROCESSES

## DUE DILIGENCE

As a result of our risk-based approach we have mainly focused on tier one suppliers in our supply chains, considering factors such as the goods or services, country of origin, vendor and spend level. However, we recognise the importance of understanding risks in our supply chains beyond the business partners with whom we have direct contractual relationships.

We are committed to continue our due diligence processes when contracting with external suppliers and to identify and assess any indications of suppliers being of high risk. We have considered using contractual clauses to set expectations of suppliers regarding their sub-contractors as well as raising awareness amongst our employees of how to identify and report potential issues relating to multi-layered arrangements.

Our aim is to integrate human rights considerations, including modern slavery, into our risk management

processes. These processes may include incident reporting, audits, and site-based risk assessments. We understand that meaningful stakeholder consultation, including with individuals and groups whose rights may have been affected, plays a central role to our processes and considerations in relation to modern slavery.

Our analysis this year was primarily based on information obtained through public sources, however if a high-risk supplier is identified we will engage directly with that supplier for more detailed information as well as conducting ongoing monitoring and reporting to ensure compliance with current modern slavery requirements. A direct information request may 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.

“

*Our aim is to integrate human rights considerations, including modern slavery, into our risk management processes.*

”





## REMEDIATION PROCESSES

We are building 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. This is an area that is continually being improved upon and is included in the New Employee Induction as well as continual education programs. Our aim is to ensure that human rights are understood, respected and upheld within our organisation and across our supply chains. We expect our partners and stakeholders to adhere to ethical business conduct standards which are consistent with our own, and we are committed to working with them to fulfil this common goal.

This year we developed our Human Rights Policy and rolled out a new whistleblowing procedure that operates confidentially. Both these documents are available to all employees, contractors and community members on our website at [www.tuttbryant.com.au](http://www.tuttbryant.com.au). These programs have established an internal grievance procedure and resolution options. We will continue to evolve our approach to deal with any issues, including the

development of external grievance procedures for third parties, which we intend to make available to our suppliers and business partners. Employees can report to their manager, or if they wish to remain anonymous, employees and third parties are able to make a report through our Whistleblower program.

Grievance mechanisms can help to highlight systemic issues and by doing so, strengthen and inform human rights due diligence. Where grievances or concerns are raised, we will investigate and address them as appropriate. This may include 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.

To date we have not identified any instances of modern slavery associated with our operations or in relation to our immediate supply chains. Neither have we received any concerns from our customers through our feedback channels.



# MEASURING EFFECTIVENESS

We acknowledge the complex challenges in measuring human rights impacts and recognise there are currently no fundamental units of measurement or international standards we can utilise. We aim to explore mechanisms to assess the effectiveness of actions, whilst we undertake to address modern slavery risks.

Our grievance mechanisms are one way in which we can track our performance against our risk mitigation goals. No modern slavery related complaints were received during the reporting period from 1 April 2019 to 31 March 2020.

We recognise that having no or a low number of complaints may not accurately indicate that there were no incidents and we are exploring additional ways to capture data moving forward. We aim to ensure that our grievance and reporting mechanisms are robust and can be effectively used by employees and other stakeholders to raise concerns around modern slavery.

At this early stage, the mitigation actions we are considering to aid us in the identification of modern slavery risks include: senior management annually reviewing our mitigation actions and responses to modern slavery concerns, site visits to suppliers, expand 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.

Another avenue we are exploring is how our key performance indicators (KPI's) can help us to track the effectiveness of our actions to prevent and address modern slavery in our supply chains.

We also recognise that cost and productivity focused KPI's can result in less robust protections against modern slavery. As part of our risk mitigation strategy, we aim to raise awareness about these types of implications and seek to ensure that price minimisation should not result in our policies, standards or Code of Conduct being compromised.

“

*We aim to ensure our grievance and reporting mechanisms are robust and can be effectively used by employees and other stakeholders to raise concerns around modern slavery.*

”



# STAKEHOLDER ENGAGEMENT AND CONSULTATION

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.

The structure of Tutt Bryant as outlined under Criterion 1 and Criterion 2 on pages 10-13 of this Modern Slavery Statement has dictated our approach in relation to stakeholder engagement and consultation.

Whilst reporting conducted by the head entity, each of the consolidated entities has been engaged in the discovery process of exploring operational and supply chain exposures. Further consultation has been held across all consolidated entities for clarification and forward planning of future Modern Slavery, Human Rights and Sanctions initiatives.

Our aim is to focus on improving our stakeholder engagement methods and one of the initiatives we will introduce is to invite our key suppliers to make a voluntary statement if they are not required to

submit their own report either in Australia or in any of the other complying jurisdictions. One of the areas we would like to commence our discussions in, is contractor engagement. We recognise that contractors can be vulnerable to exploitation including modern slavery and we aim to ensure our suppliers are only engaging contractors in accordance with relevant labour rights.

As a wholly owned subsidiary of Tat Hong Holdings Ltd, Tutt Bryant Group Limited is committed to comply with all economic and trade sanctions imposed by the United Nations Security Council, the European Union, the United Kingdom and the United States of America, as well as applicable sanctions, laws and regulations in Australia.

Our parent Company group is primarily located in south-east Asia, China and Australia, but also exports equipment and undertakes crane rental or heavy-lifting projects outside of these geographical areas. Due to the international aspect of the wider Tat Hong group operations, we aim to comply with trade and transactional restrictions imposed by economic and trade sanctions both in Australia and Singapore.





# LOOKING FORWARD

Modern slavery risk management requires continuous commitment and ongoing collaboration both from within our business and through multi-stakeholder dialogue. We will continue 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 will focus on:

## **Increasing awareness**

- Raising awareness among our suppliers, including helping build capacity of suppliers to comply with the *Modern Slavery Act 2018* (Cth).
- Encouraging our suppliers that are not required to submit a modern slavery statement either in Australia or their own jurisdiction, to submit one voluntarily.
- Continue to build expertise within teams at our locations, particularly those that engage contractors and sub-contractors in their workforce, so they can better identify and act on any indications of modern slavery.

## **Due Diligence and risk assessment**

- Continuing to evolve our approach in identifying risk factors from available information sources and determine effective mitigation steps.
- Reviewing our risk assessment and mitigation measures with respect to modern slavery.
- Exploring better ways to identify and act on risks further down our supply chains.

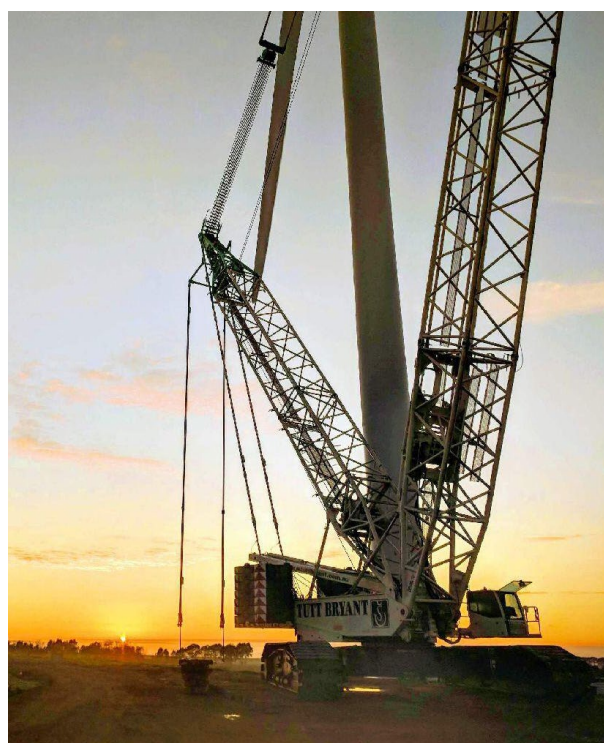
We are pleased with our initial efforts towards mitigating risks of modern slavery throughout our business and we will continue to look for new and better ways to eradicate any risk of modern slavery

in our business dealings. We understand this cannot be achieved alone and look forward to engaging with others to reach overall improvement and impact on the global eradication of modern slavery and human rights abuses.

“

*We will continue to look for new and better ways to eradicate any risk of modern slavery in our business dealings.*

”



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



**Chen Wei Ng**  
Managing Director



# TUTT BRYANT GROUP LIMITED

---

*A Member of Tat Hong Holdings Ltd*



**tuttbryant.com.au**

©Copyright Tutt Bryant Group Limited  
12.2020

FOLLOW US ON SOCIAL MEDIA

