

**TUTT BRYANT GROUP LIMITED**

*A Member of Tat Hong Holdings Ltd*



# **MODERN SLAVERY**

## **STATEMENT 2024**



**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 by having greater transparency throughout its supply chains. This will provide us visibility to identify where any Modern Slavery is occurring, what form it takes, who the victims are and who should be accountable, and how to effectively manage the situation.

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. Our efforts to contribute towards the elimination of Modern Slavery is consistent with the Tutt Bryant business objective of Sustainability, whilst also upholding our core company values found in “*The Tutt Bryant Way*”, specifically Family and Integrity.

# THE TUTT BRYANT WAY

**OUR VISION**  
**HOOKING UP TO SUCCESS**

**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 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.

**TUTT BRYANT**

# TUTT BRYANT BUSINESS OBJECTIVES

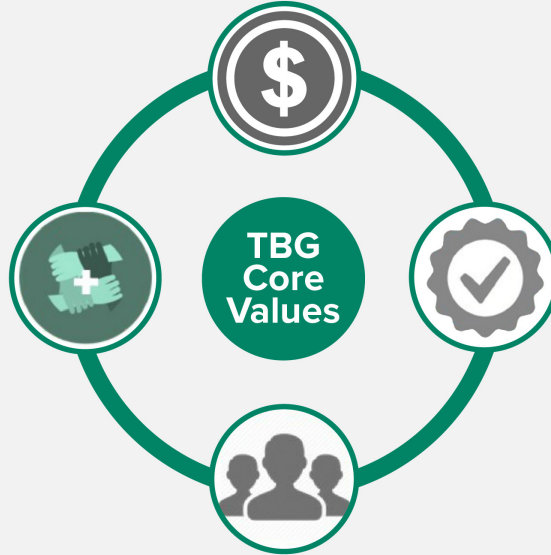
## VALUE CREATION

Ensure ongoing profitability and value creation for our stakeholders so that their commitment of capital, labour and other resources are appropriately remunerated. This requires both operational and strategic considerations to grow and protect top-line revenue, and to avoid disproportionate costs and expenditure.

## SUSTAINABILITY

Ensure enduring viability and resilience over the long-term by setting strategies, frameworks, system and processes that safeguard the continuing integrity of our business.

The highest priorities are placed on the health, safety and wellbeing of our people, the impact on the environment by our activities, and the relationships with our partners, suppliers and communities.



## QUALITY

Ensure customer expectations are consistently met or exceeded with the delivery of high-quality products, services and activities so as to generate repeat business and positive referrals.

The integrity of our product and service offerings means that we will always strive to provide our customers top value in terms of price, quality, safety, fit-for-purpose and environment considerations.

## PRODUCTIVITY

Ensure a positive work environment that brings about the best possible performance given the resources available. It is recognised that overall business outcomes are critically dependent on the high standards set and maintained by our people, which will also lead to personal growth, fulfilment and identity.

TUTT BRYANT 

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 have achieved over the past reporting period and highlights the steps we have taken in our last financial year to 31 March 2024. 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 fifth 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 2024.

## Our priorities throughout the 2023/2024 reporting period

- **Workforce Education**
  - » The Modern Slavery Awareness program is now part of our Company induction process.
- **Supplier Engagement Plan**
  - » The second round of our External Supplier Questionnaire implementation has taken place as we continue to collect primary data on our supplier's Modern Slavery risks.
  - » Assess data obtained from returned questionnaires.
- **Data Capture**
  - » Assess our data capture processes to ensure we receive as much information about Modern Slavery risks in our supply chain.
  - » Conduct risk assessments of our suppliers' exposure to Modern Slavery to eradicate it from our supply chain.
- **Compliance Survey Requests**
  - » Compliance with Modern Slavery survey requests received from external parties.
- **Continuous Improvement**
  - » Engage with our stakeholders and review industry best practice for identifying and addressing Modern Slavery related matters.
  - » Implement best practice by staying up to date with legislative material to reduce the risk of vulnerable workers and supply chains becoming exposed to Modern Slavery.

## Progress Against our 2023/2024 Priorities

During the reporting period, we maintained a working group to monitor our Modern Slavery commitments to ensure project momentum was retained. Tutt Bryant's Modern Slavery working group continues to meet on a regular basis to discuss progress against the aforementioned priorities and ensure adequate reporting to Tutt Bryant's executive team.

### Workforce Education

Tutt Bryant's Modern Slavery Awareness Training Program is now incorporated in our compulsory inductions for all employees to complete upon joining the Company. 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 entire workforce and management on how to report any suspected breaches in these areas.

### Supplier Engagement

During the reporting period we implemented our second round of our External Supplier Questionnaire which is an instrument used to identify Modern Slavery risks in our supplier network. We used centralised supplier information to ensure correct priority can be assigned for Supplier data gathering purposes. The External Supplier Questionnaire was sent to our most significant suppliers across our respective divisions, allowing us to create a risk classification and rating to prioritise which, if any of our suppliers need further investigation. This second round adopted a new questionnaire format compared to our first External Supplier Questionnaire to limit the risk of our suppliers' email security systems rejecting our request for completion.

### Data Capture

We continuously 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.

During the reporting period, we amended the format for capturing initial supplier screening information through our External Supplier Questionnaire. This amended format resulted in an increase in uptake compared to the first-round questionnaire, increasing from approximately 20% to 35% rate of completion. Despite this increase, this uptake is still below our expectations and so we are considering alternative methods to distribute the External Supplier Questionnaire. One method that will be considered is changing our point of contact with our suppliers, by involving our operational divisions to contact suppliers directly as opposed to through our Modern Slavery working group.

Finally, we are exploring options to embed the Supplier Questionnaire into our standard supplier onboarding and evaluation processes.

### Continuous Improvement

We continue to evaluate our approach to Modern Slavery against others to identify any gaps in our analysis of the matters at hand. Our Modern Slavery working group regularly reviews the Modern Slavery Statements of our competitors and industry leaders to gain insight into areas we can seek to improve. Furthermore, we remain diligent in identifying any updates in best practices towards Modern Slavery.

# 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, 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.

Tutt Bryant employs just over 570 employees across nearly 30 locations nationally. As part of its statement, Tutt Bryant reports on its actions to analyse and address Modern Slavery risks in its operations. This is exhibited by providing internal training to all our employees through the Tutt Bryant Group Limited Modern Slavery Awareness Training Program. Tutt Bryant also engages in contracts requiring parties to comply with the Modern Slavery requirements outlined in the Act, which includes warranties, obligations, and auditing powers with its customers.

## 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. Since 2022, Tutt Bryant Equipment has included the activities of 600 Cranes Australasia, the national distributor of Fassi knuckle boom truck loading and marine cranes, Marrel hooklifts, Jekko mini crawler cranes and Idrobenne grapples and clamshell buckets for cranes. 600 Cranes Australasia offers a full range of sales and servicing workshops with accredited agents around Australia. Services also include remote and offshore servicing, maintenance and inspections.

Since our last statement Tutt Bryant has launched "Tutt Bryant Go Green", an operational initiative that will contribute towards Australia's decarbonisation journey, offering innovative and sustainable product solutions, including low to zero carbon emitting equipment to market.

**Tutt Bryant Hire** is the organisation's General Equipment Hire division. With a comprehensive range of equipment for hire from 20 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.

**Cranecorp Tutt Bryant Joint Venture** is an unincorporated joint venture aiming to create a single 'all-in-one' source of supply for cranes, heavy lifting, heavy transportation, and alternative lift & shift solutions. The joint venture brings together the unique capabilities of two specialists, offering the combined experience, fleet composition and geographical locations across Western Australia and beyond.

**NYFL Tutt Bryant Joint Venture** - Previously known as Garlbagu Tutt Bryant, the incorporated joint venture NYFL Tutt Bryant Pty Ltd was established in June 2021 and operates from the heart of traditional Ngarluma and Yindjibarndi lands in Karratha and Roebourne. NYFL Tutt Bryant aims to support customers and projects with general equipment and plant hire services. Through its business and social activities, the joint venture's purpose is to create genuine outcomes for Traditional Owners and long-term sustainable change under the motto "driving social change through business".

## Our Supply Chain

Our supplier relationships have remained 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 increased our procurement from suppliers in competitive market countries, including China. When measured by value, most of our payments are made to suppliers in Australia, Japan, China, Finland, Italy, the United States of America and, our parent company in Singapore. Tutt Bryant reports on its actions to analyse and address Modern Slavery risks in its supply chains. This has been done through the implementation of our Supplier Questionnaire, placing our suppliers on a risk profile allowing us to identify high risk areas and take steps to mitigate these risks. As a part of Tutt Bryant's approach with new suppliers, we carry out in depth due diligence including senior executives and management visiting overseas manufacturing facilities to observe work practices whilst also continuing professional business relationships including open and free communication.

We often operate in remote locations throughout Australia with many contracts supporting local procurement policies to strengthen local communities. This activity has been further enhanced during the reporting period through the increase in the activities of NYFL Tutt Bryant Pty Ltd. 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 group-wide being employment/wages and employee development.

For more information about Tutt Bryant's products, visit our website at [www.tuttbryant.com.au](http://www.tuttbryant.com.au)



# Risk Assessment and Mitigation

## Tutt Bryant's Principles and Policies

Tutt Bryant's commitment towards the eradication of Modern Slavery and human rights violations is embedded in its business objectives as well as its core company values found in "*The Tutt Bryant Way*". Furthermore, Tutt Bryant has adopted principles and policies to prevent Modern Slavery, human trafficking and protecting human rights. Tutt Bryant's commitment to respecting human rights is embodied in the following materials:

- Code of Conduct;
- Human Rights Policy;
- Tutt Bryant's Business Values Strategy and Sustainability Policy; and
- Whistleblowers Protection Standard.

In addition, as a member of Tat Hong Holdings Ltd ("Tat Hong Holdings"), 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, Belarus 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.

## Our approach in Risk Assessment and Mitigation

We continue 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, although further assessment of our Supplier Questionnaire will take place in the next reporting period to identify areas of vulnerability in our operations and supply chain. We recognise that we could potentially be indirectly exposed to Modern Slavery in some of our entities' supply chains and operations due to the geographical location of some manufacturers of our plant and equipment. While the majority of our suppliers are based in developed economies, we acknowledge that we lack complete visibility in some overseas markets. Tutt Bryant seeks to mitigate its exposure in such overseas markets by executive managers' visits to these suppliers' offices and manufacturing facilities as we aim to maintain a low risk profile with respect to Modern Slavery and human rights.

# Due Diligence and Remediation Processes

## Due Diligence

Tutt Bryant takes a group-wide, 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 included analysis from tier one suppliers to lower tiers in our Supplier Questionnaire. This was developed with support from all departments, consolidating all our divisions and entities. We recognise the importance of understanding risks in our supply chains beyond our regular business partners with whom we have direct contractual relationships.

Where a high-risk supplier is identified, we will seek to engage 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

As mentioned, our Internal Modern Slavery Awareness Training Program has now been included as a compulsory training induction for all incoming Tutt Bryant employees. This program aims to build our employees' awareness on how best to engage with Tutt Bryant's risk management processes and how they appreciate and recognise potential cases of Modern Slavery. We have also built on our first round of data collection from the External Supplier Questionnaire which we have adapted in order to improve our information gathering abilities for the next round of questionnaire distribution. 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 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. Our External Supplier Questionnaire in particular includes 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 continued to review our reporting mechanisms throughout the reporting period so that they adhere to external escalation points appropriately to ensure compliance and good practice.

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 notifications were received during the reporting period from 1 April 2023 to 31 March 2024.

During this reporting period we have continued the inclusion of our Internal Modern Slavery Awareness Training in our Tutt Bryant induction process. This has allowed us to increase awareness and ensure high workforce engagement is reached so our entire business is provided with adequate tools to identify and report on suspicions of Modern Slavery. The growing awareness and understanding of Modern Slavery have empowered our employees to enhance their ability to identify risks of Modern Slavery in our supply chain.

After the second round of our External Supplier Questionnaire, an assessment on its delivery has been conducted by Tutt Bryant's executive management team in consultation with the Modern Slavery working group to measure its effectiveness. As a result, Tutt Bryant has decided to change our point of contact with our suppliers, by involving our operational divisions to contact suppliers directly as opposed to through our Modern Slavery working group. By seeking direct contact, Tutt Bryant aims to improve participation in the Questionnaire.

Additional actions we engaged with throughout the reporting period include: Annual review of our mitigation actions and responses to Modern Slavery concerns by Tutt Bryant's executive team, site visits to suppliers, 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. The executive management team, in consultation with the Modern Slavery working group, also assessed the value of an 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.

While reporting is conducted by the head entity, our Modern Slavery working group liaised with each of the consolidated entities to engage 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.

During the reporting period Tutt Bryant observed an increase in requests to complete Modern Slavery Questionnaires from customers and suppliers. This marked increase in Modern Slavery activity assisted us in ensuring our own processes are adequately designed to capture essential data.

# 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 period we aim to focus on:

- **Supplier Engagement**

- » Investigate and consult with the divisions to change our External Supplier Questionnaire point of contact and begin our third implementation round.
- » Data review to further assess supplier engagement and how effective our automated data processes are.
- » We will continue to consult with our suppliers and workforce to identify gaps in knowledge and develop ways to improve identified deficiencies.
- » Update of our contracting practices to include provisions to counter Modern Slavery practices and ensure compliance of our customers and suppliers with the applicable Modern Slavery legislation.

- **Measuring Effectiveness**

- » We will use the next reporting period to assess the effectiveness of the systems and processes we have implemented. This includes a review and update of our Internal Modern Slavery Awareness Training Program and review of our current policies.
- » An assessment of uptake and format of the third round External Supplier Questionnaire will occur after implementation.
- » We will assess the value of engaging an external provider to conduct a review of the systems and processes we have implemented to address Modern Slavery concerns and risks.
- » We will continue to explore ways to successfully engage with our stakeholders.

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

***This Modern Slavery statement will be published on the Australian Government's Online Register for Modern Slavery Statements.***

***This 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

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