

HUTCHIES 

1912

2025
Modern Slavery

Statement



The Board of Directors of J Hutchinson Pty Ltd is the principal governing body for the purposes of the Modern Slavery Act 2018 (Cth).

This Modern Slavery Statement has been approved by the Board for the financial year ending 31 December 2025 and is submitted in accordance with section 13 of the Act.

Russell Fryer

Managing Director
Joined Hutchies 1998

Contents

- 04** Reporting entity
- 06** Structure, operations + supply chains
- 08** Modern slavery risks
- 10** Actions to assess + address
- 12** Remediation + reporting
- 13** Assessing effectiveness
- 14** Consultation
- 15** Future focus

Reporting entity

J Hutchinson Pty Ltd (ABN 52 009 778 330) (Hutchies) is Australia's largest privately owned construction company. Hutchies operates nationally and delivers projects across a broad range of sectors, values and client types.

Hutchies directly employs approximately 1,800 people, with all of our workforce based in Australia. All Hutchies employees are engaged under Australian employment laws and standards.

We undertake a significant portion of construction activities through subcontracting and supply arrangements. As a result, our modern slavery risks are concentrated primarily within our supply chains rather than our directly employed workforce.

90+

Trades + services procured

125

Projects built annually

10,000+

Vendors engaged

98%

Of our people are permanent full-time

80%

Of our workforce is site based

100%

Of our workforce is based in Australia

04 Reporting entity
06 Structure, operations + supply chains
08 Modern slavery risks

10 Actions to assess + address
12 Remediation + reporting
13 Assessing effectiveness

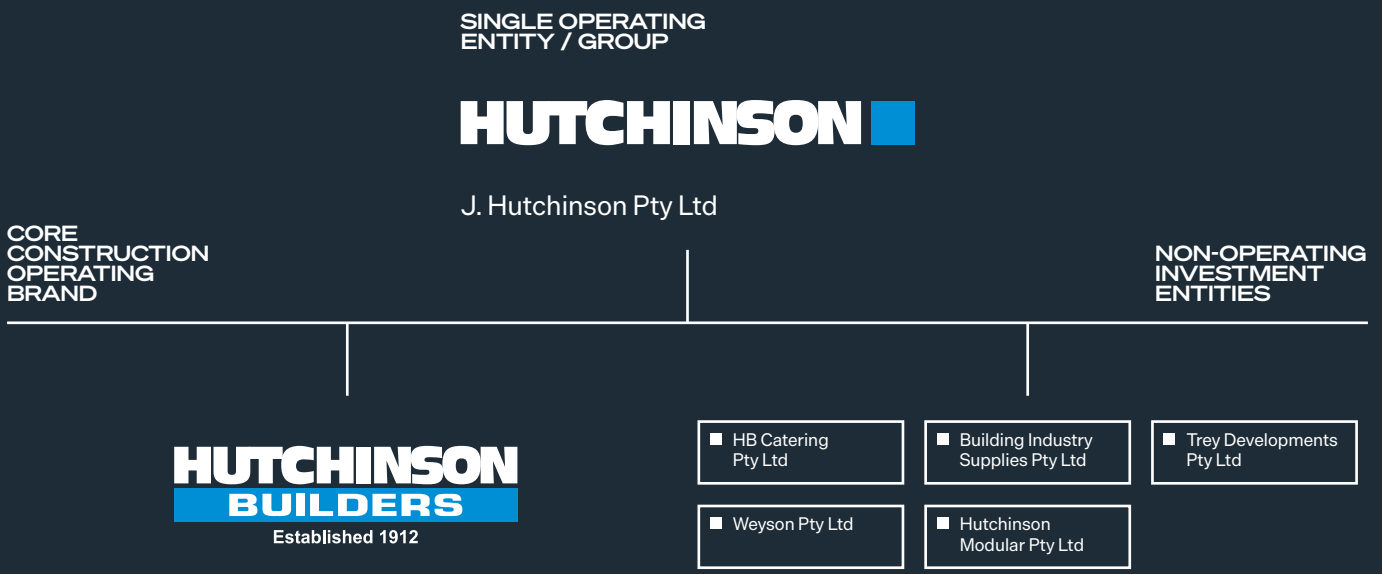
14 Consultation
15 Future focus



Structure, operations + supply chains

Hutchies operates as a single reporting entity under J Hutchinson Pty Ltd. The business undertakes construction projects across multiple sectors and locations throughout Australia.

Entity relationships



All employment and operating activities are engaged by J. Hutchinson Pty Ltd

These entities do not actively operate, and have no employees or supply chains

Hutchies delivers projects using a combination of direct labour and extensive subcontracting and supplier arrangements. As a result, Hutchies' supply chains are multi-tiered and may include subcontractors, supply-only vendors and upstream manufacturers.

While the majority of Hutchies' Tier 1 subcontractors and suppliers are Australian-based, some materials and manufactured products used on projects may be sourced from offshore locations through Tier 2 and Tier 3 suppliers. These upstream tiers present greater inherent modern slavery risk and reduced visibility.

Hutchies continues to improve its understanding of supply chain structures and risk exposure through supplier engagement, data collection, audits, industry collaboration and ongoing refinement of internal systems.

Supply chain

90%

Vendors are based in Australia

10%

Procured from China, Malaysia + Central Europe



Modern slavery risks

Hutchies' modern slavery risk profile reflects the broader construction industry, where risks are more likely to arise through complex, labour-intensive and multi-tiered supply chains rather than direct employment.



Hutchies considers modern slavery risks across four main areas:

■ 01

Labour-intensive services

Including subcontracting and labour hire arrangements where vulnerable workers such as migrant or temporary workers may be at higher risk of exploitation.

■ 02

Upstream manufacturing of materials

Particularly where products or components are manufactured, processed or assembled offshore in higher-risk jurisdictions.

■ 03

Multi-layered subcontracting

Where visibility and influence decrease beyond Tier 1 suppliers.

■ 04

High-risk materials and categories

Including, but not limited to, manufactured construction materials, electronics, facade systems, textiles and cleaning services.

All Hutchies' people are based in Australia and subject to Australian workplace and safety laws, significantly reducing the risk of modern slavery within Hutchies' direct operations. As a result, Hutchies focuses its risk management efforts primarily on supply chain activities where risk exposure is higher and indirect.



Actions to assess + address

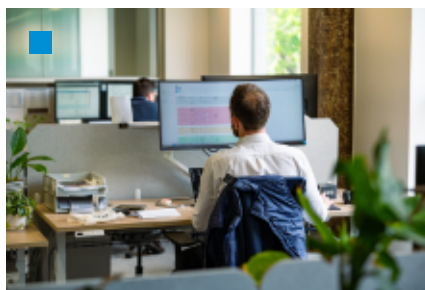
Hutchies adopts a risk-based and proportionate approach to assessing and addressing modern slavery risks. This approach focuses on the risk of harm to people and reflects the level of influence Hutchies can reasonably exercise across different parts of its operations and supply chains.

Actions



Supply chain mapping + data collection

To improve visibility of suppliers, subcontractors, materials and services.



Vendor Management Tool

To support supplier onboarding, compliance checks and collection of relevant information.



Contractual requirements

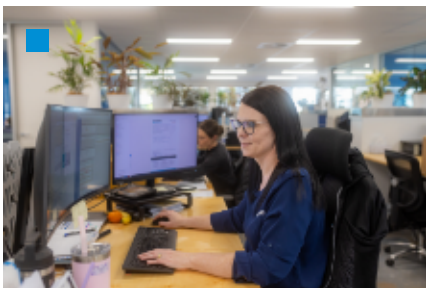
Requiring compliance with applicable laws, including modern slavery, workplace relations and work health and safety legislation.

04 Reporting entity
06 Structure, operations + supply chains
08 Modern slavery risks

10 Actions to assess + address
12 Remediation + reporting
13 Assessing effectiveness

14 Consultation
15 Future focus

Many controls that support modern slavery risk management are embedded within Hutchies' existing site management, safety and contractor governance processes, including site access controls, induction processes, monitoring of work practices and clear reporting pathways for concerns.



Targeted desktop reviews + audits

In higher-risk categories and materials.



Supplier engagement + guidance

Including access to information resources and support to build awareness and capability.



Training + awareness

For team members involved in procurement, subcontractor management and site operations, focused on construction-specific risks and practical indicators.



Remediation + reporting



Hutchies expects suppliers and subcontractors to have appropriate mechanisms in place to enable workers to raise concerns safely and without retaliation.

Where potential issues are identified through audits, engagement, reporting or industry intelligence, Hutchies seeks to understand the issue and, where appropriate, work with suppliers to support improvements. We recognise that remediation outcomes will depend on the specific circumstances and the level of leverage Hutchies can reasonably exercise.

We maintains confidential reporting channels for any parties to raise concerns and encourage early reporting of any issues that may indicate potential exploitation or unethical conduct.

Assessing effectiveness

Hutchies assesses the effectiveness of its modern slavery actions through ongoing review rather than one-off measurement.



This includes consideration of:

Supplier engagement and onboarding outcomes

Audit findings and follow-up actions

Responses to supplier surveys

Trends or issues identified through site engagement and industry collaboration

Periodic review of policies, procedures and contractual controls.

Insights gained from these activities are used to refine Hutchies' priorities, strengthen risk-based focus and guide future engagement across the supply chain.

During the reporting period, Hutchies did not identify any confirmed instances of modern slavery within its operations or supply chains through existing monitoring and engagement activities. We recognise that the absence of identified cases does not mean the absence of risk and continues to focus on improving visibility and detection over time.



Consultation

This statement has been prepared in consultation with internal stakeholders across operations, procurement, legal, sustainability and executive leadership. These consultations inform the identification of modern slavery risks, the actions described in this statement and Hutchies' ongoing approach to continuous improvement.

Future focus

Hutchies recognises that expectations relating to modern slavery risk management continue to evolve in Australia and internationally. We will continue to monitor regulatory developments, industry guidance and emerging best practice.

Our focus remains on taking practical, proportionate and risk-based actions that support ethical outcomes for people, while working collaboratively with suppliers, industry peers and clients to minimise duplication and support consistent application across shared supply chains.



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