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# Modern Slavery Statement 2020

**JOHN HOLLAND**

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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 2020 to 31 December 2020.

This Statement applies to the following six 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
- John Holland Rail Pty Ltd

In this Statement, the terms 'John Holland', 'we' and 'our' are used to refer collectively to these six 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 23 June 2021. 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).<sup>1</sup>

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 and Chief Executive Officer.

This Statement has not been externally assured.

We welcome feedback on this Statement at: [corporate.reception@jhg.com.au](mailto:corporate.reception@jhg.com.au)

<sup>1</sup> 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 the majority of its Directors approved this Statement as common Directors of John Holland Group Pty Ltd.



## CEO message

Our purpose at John Holland is to transform lives.

We think deeply about what we do and how it affects lives, and this informs how we deliver the infrastructure, buildings and railways that we have been entrusted with.

In line with our values, we are committed to eradicating any form of human rights abuse from our supply chain, including modern slavery.

I am proud to present our first Modern Slavery Statement, where we explain how we assess risks in our supply chain, set clear standards, and continuously improve our oversight and management of any identified risks.

We undertake a diverse range of projects, including construction, design, and operations & maintenance. As a result, our supply chain includes providers as broad as civil subcontractors, concrete suppliers, professional consulting services, fabricated steel suppliers and labour hire.

It is vital for companies like ours to lead and take action to protect human rights at every level of our supply chain.



**Joe Barr**  
Chief Executive Officer

# Our structure, operations & supply chain

## Who we are

Since our foundation more than 70 years ago, we have been committed to supporting communities around Australia by building infrastructure that improves lives and makes us more connected.

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

Today, we are delivering many of Australia's largest infrastructure projects, transport services, as well as significant property and transit-oriented development projects. 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 in communities 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 our business sustainably 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 Stock Exchanges (601800SH). 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 construction and operation of rail infrastructure and services.

Three of these controlled entities are incorporated outside Australia, in New Zealand, Malaysia and the United Kingdom. Of these three entities, only the New Zealand entity undertakes active operations, which relate to rail construction and maintenance contracting. Management control of this entity remains in Australia.

John Holland also undertakes a range of joint venture activities. Our joint venture activities primarily relate to construction activities in Australia, but also included a small number of construction projects in Singapore 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<sup>2</sup> and New Zealand and our main areas of operation include:

- **Infrastructure:** Constructing and maintaining infrastructure, such as major roads and bridges, tunnelling, and water and waste-water treatment solutions
- **Rail:** Rail operations & maintenance and the construction of rail assets
- **Building:** Major building projects, such as airports, correctional facilities, hospitals, education and research facilities, and commercial and residential development.

Some of our current key projects include building the new Sydney Football Stadium, delivering the Melbourne Metro Tunnel and Stations Project, and undertaking a major upgrade of the Bruce Highway in Queensland. More detail about our operations and projects is set out on our website and in our [2020 Annual Review](#) (available on our website).

As part of our operations, we undertake a diverse range of activities. For example, in 2020, our tunnel boring machines tunnelled over 10,000 metres; we excavated over 1 million bank cubic meters of rock in Sydney; operated over 920,000 passenger services available to more than 10 million people; and constructed or upgraded over 5,000 kilometres of railway track, wiring, signalling and turnouts.

To support our operations, we employ over 5,000 employees. These employees undertake roles relating to engineering, project management, site supervision and other internal corporate functions such as legal, finance, people, risk 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, including our workforce composition and project locations, is set out in the infographic and map on pages 6 to 9.

## Our governance

We recognise that a workplace that prioritises integrity, ethics, transparency and reporting enables robust and thoughtful decision-making that 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 has been implemented, which provides for the delegation of functions to a number of Board and Management Committees. The Board Governance, Compliance & Audit Committee (GCA Committee) supports the Board to monitor the financial performance and disclosures of John Holland, as well as compliance with all applicable laws and regulations, including our modern slavery reporting. Further, the Board's Risk Committee supports the Board to oversee the framework for, and the reporting of, risks including enterprise, project procurement and 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.

<sup>2</sup> We undertake the majority of our operations as John Holland but also operate under the business name 'Territoria Civil' in the Northern Territory. In addition to our Australian and New Zealand operations, we also undertook a small number of construction projects in Singapore during the reporting period.

## Our operations

**60**

projects across  
Australia and New  
Zealand worth  
**\$13.6 billion**

**21**

projects  
completed  
in 2020

**5,356**

Number of  
employees

**\$4.82b**

New Work Won

## Our supply chain

Over  
**8,000**  
Australian  
suppliers

Approximately  
**50**  
international  
suppliers

Over  
**\$4.9b**  
supplier spend

**\$10.4m**  
spend with social  
enterprises

## Our projects & offices



## Corporate offices

### Sydney

65 Pirrama Road  
Pyrmont NSW 2009  
Phone: +61 2 9552 4288

### Melbourne

Level 9, 180 Flinders Street  
Melbourne VIC 3000  
Phone: +61 3 8698 9400

### Brisbane

1000 Ann Street  
Fortitude Valley QLD 4006  
Phone: +61 7 3867 7000

### Perth

Level 8, Commercial Tower 3  
10 Telethon Avenue, Perth WA 6000  
Phone: +61 8 9482 2700

### Darwin

110 Coonawarra Rd  
Winnellie NT 0820  
Phone: +61 8 8943 1000

### Hobart

Level 2, 13-17 Castray Esplanade  
Battery Point TAS 7004  
Phone: +61 3 6221 8900

### New Zealand

Level 2, 56 Parnell Road, Parnell  
Auckland 1052, New Zealand  
Phone: +64 9 525 1743



We have 60 projects in Australia and New Zealand across the following sectors:

**Infrastructure**

- Major roads and bridges
- Tunnelling
- Water and wastewater treatment solutions

**Rail**

- Rail operations and maintenance
- Rail systems delivery and integration

**Building**

- Airports
- Corrections
- Commercial
- Education
- Health

## Our supply chain

We are primarily based in Australia, but our suppliers span the globe.

To support our work in the infrastructure, railway and property sectors, we procure almost \$5 billion of goods and services from our suppliers annually. While 99% of our Tier One suppliers<sup>3</sup> are located in Australia (approximately 8,250 suppliers in 2020), many of the diverse products and services they provide have international supply chains. We also engage directly with a small number of overseas suppliers (approximately 50 suppliers in 2020). The case study on page 11 highlights the complexity of our procurement activity.

Our procurement systems and policies are managed by a central procurement team, which also oversees international procurements and other strategic procurement activities, such as purchasing of personal protective equipment (PPE) during COVID-19. 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 these projects, in which case we are responsible for the operations of the site and execute the project using our own products 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. We expect all our joint venture partners to maintain high ethical standards, including where they serve as the principal contractor for projects.

The key categories of goods and services we procure include:

- Civil sub-contracts: including contracts to construct bulk earthworks, pavements, drainage and reinforced concrete structures
- Concrete and reinforcing products: including ready-mix and precast concrete, reinforcing bar and mesh
- Building materials and products: including facades and external cladding
- Rail systems: including construction materials and signalling, communications & control systems
- Mechanical, electrical and systems: including HVAC, Pumps and Pipelines, control systems, electrical wiring, transformers and switchboards, and sub-components making up the systems
- Professional consulting services: including engineering design services, as well as environmental, inspection and construction services
- Labour hire: including short and long-term project labour for our sites
- Plant and equipment: including dry hire (hire of equipment) and wet hire (hire of equipment and services to operate it), as well as purchase of a wide range of owned equipment, from heavy earthmoving equipment such as tunnel boring machines to light towers and elevated work platforms
- Fabricated steel: including heavy, medium and light steel products from bridge girders through to handrails and streetlights
- Industrial consumables: including gasses, welding consumables, fasteners, small tools, and PPE
- Fuels and lubricants: including fuel and lubricants for plants and equipment and hydraulic oils

<sup>3</sup> Our Tier One suppliers are suppliers with whom we have a direct contractual relationship.

As part of our procurement, we have a strong focus on creating opportunities through social inclusion. We are improving our social procurement and inclusion practices, including by working with our subcontractors and suppliers to provide employment opportunities to people from diverse backgrounds. This includes supporting employment either directly or indirectly through social and Indigenous enterprises.

In 2020, we spent more than \$10 million with social enterprise organisations such as Veterans in Construction. This organisation opens the door for veterans to work in construction. We also have a partnership with CareerSeekers, a program providing refugees and asylum seekers with pathways to employment on our projects.

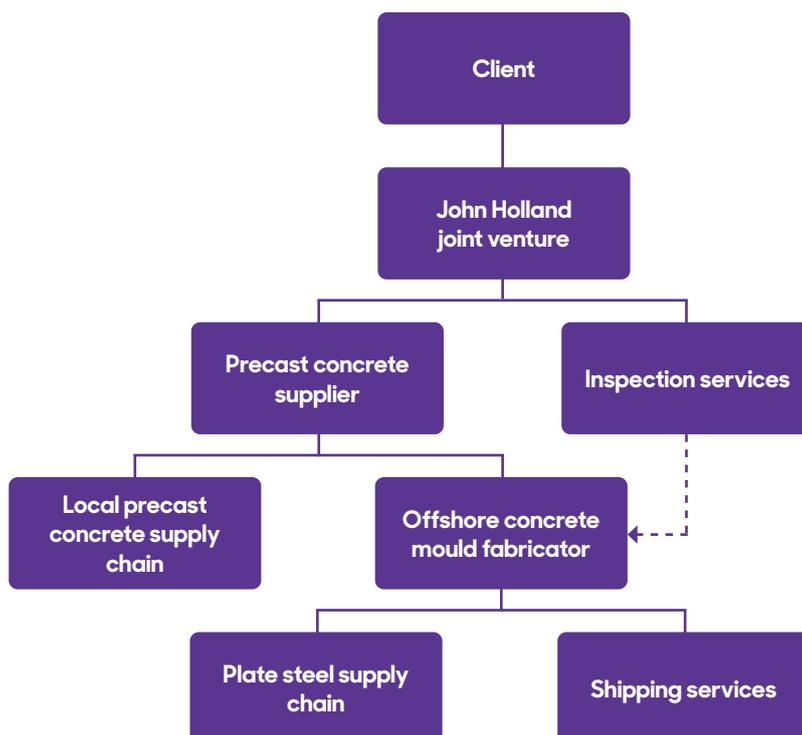
We also empower our projects to use local and Indigenous suppliers. In 2020, we spent more than \$50 million with almost 60 Indigenous suppliers across our projects. In some circumstances, this focus on social enterprises and smaller, local businesses may help us to reduce our exposure to modern slavery risks associated with larger international suppliers because we are more easily able to monitor working conditions and undertake due diligence.

### Case study: Complex global procurement

The range of goods and services we procure mean that our supply chain can be long and complex. This case study aims to provide a practical overview of how construction industry supply chains operate by outlining our work to procure precast concrete for a major rail infrastructure project.

Our customer contracted with an unincorporated joint venture between John Holland and another entity to deliver a railway construction project. As part of this contract, the joint venture subcontracted with another company to supply the precast culverts to the project. In order to manufacture the precast concrete, this company required additional moulds and subcontracted the fabrication of these moulds to another company in Spain. The fabrication of these moulds involved a complex supply chain, including steel plate, paints, welding, consumables and various fasteners.

As a risk mitigation strategy, including in response to the COVID-19 pandemic, the joint venture (acting through John Holland procurement) organised inspections of the manufacture of the moulds in Spain. The primary aim of this inspection was to verify the fabrication progress and quality. However, the inspectors have a level of training and commitment to responsible business standards that, when combined with the onsite nature of the inspection, allowed inspectors to view the working conditions present on site and flag any concerns around working conditions they observed in the inspection report.



## Identifying our modern slavery risks

We understand that the construction sector can include a range of modern slavery risks, which can occur in Australia and New Zealand, as well as overseas. We also recognise that modern slavery risks in businesses' global operations and supply chains can change over time.

During the reporting period, we worked to refine our understanding of modern slavery risk areas across our operations and supply chain. This included holding an interactive modern slavery risk workshop with key functions from across John Holland, including:

- Procurement
- People
- Health, Safety & Environment
- Key operational areas, including representatives from relevant controlled entities and joint ventures.

We also engaged with industry partners through the Infrastructure Sustainability Council of Australia to consider possible modern slavery risks in the road infrastructure sector, with a further focus on two identified higher risk sectors: bitumen and PPE.

Through this work, we have identified a range of potential modern slavery risk areas that may be present in the operations and supply chains of entities in the infrastructure sector. These potential risk areas include:

- The risk that contracted service providers responsible for cleaning, catering and site security services may exploit workers through modern slavery, including through unauthorised subcontracting
- The risk that labour hire firms providing contracted labour for use in construction projects may exploit workers through modern slavery, including where these workers are lower skilled or from migrant backgrounds
- The risk that products such as PPE or IT procured for employees and contractors may be manufactured using modern slavery or materials produced with modern slavery and other forms of labour exploitation
- The risk that materials used in construction projects may be manufactured using modern slavery, such as steel or bitumen
- The risk that offshore service providers of design and other services may exploit workers, including where these providers are located in countries where modern slavery is prevalent.

We also recognise that the construction sector can include modern slavery risks linked to the production of materials in countries where there are reports of forced labour. We will continue to monitor any potential risk areas relating to forced labour.

## How can businesses be involved in modern slavery?

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 UN Guiding Principles on Business and Human Rights are the globally recognised standard for responsible business conduct. They explain that businesses can be involved in adverse impacts on the human rights of people, such as modern slavery, in three ways:

- 1) By causing a human rights impact, such as modern slavery, if its own actions or omissions *directly result* in that impact
- 2) By contributing to a human rights impact if its actions or omissions *contribute* to another party causing the impact
- 3) By being *directly linked* to a human rights impact by another entity it has a business relationship with, through its operations, products or services.

As recommended by the Australian Government's guidance, we use this continuum of involvement from the UN Guiding Principles on Business and Human Rights to support our actions to assess and address our modern slavery risks.

## Case study: Procurement of PPE during COVID-19

To support the continued operation of our sites during COVID-19, we worked to significantly expand our procurement of PPE, including masks and hand sanitiser.

We recognised that the procurement of PPE can involve high modern slavery risks, and that these risks can be heightened in cases where procurements are undertaken with new suppliers who may not have undergone typical due diligence checks in situations of increased need or time pressures.

To help mitigate these risks, we worked with a trusted, Australian-based supplier with well-established supplier management processes to procure critical PPE for our sites. We proactively discussed modern slavery risks and mitigation strategies as part of the procurement, and working with a trusted supplier provided us with greater confidence that our PPE products were appropriately sourced. Our supplier also committed to supply us with further PPE if we exhausted our supply. This commitment meant that we were able to avoid stockpiling PPE and help ease the stress on the PPE supply chain.



# Our actions to assess and address modern slavery risks

We aim to conduct our business ethically and efficiently, while ensuring we are a good corporate citizen.

We have taken a range of steps to assess and address potential modern slavery risk areas in our operations and supply chain. These actions are outlined below.

## Assessing potential risks

We have refined our understanding of potential modern slavery risk areas in our operations and supply chains through an interactive modern slavery risk workshop with key functions from across John Holland, including: Procurement; People; Health, Safety and Environment; and key operational areas, including relevant joint ventures and controlled entities. This workshop contributed to the identification of possible risk areas and informed the development of action items to further strengthen our response.

## Setting clear standards

Our Code of Business Conduct (Code) is based on our values, policies, procedures and applicable laws. It guides our daily work and demonstrates our commitment to uphold proper and ethical business practices, including in relation to modern slavery. Prior to the reporting period, we updated the Code to make it clear we do not condone and will not be involved in modern slavery and set out our commitment to seek to prevent modern slavery in our supply chain. The Code applies to everyone who works for or with John Holland, including people working under contract. We require our employees and labour hire contractors to comply with the Code and our employees must also complete an e-learning module about the Code. Where John Holland has a controlling position in a joint venture or other similar arrangement, we require that the standards of behaviour contained in our Code be adopted. We also seek to work with suppliers, business partners and other third parties who operate under similar standards to our Code. Investigations into potential breaches of the Code are monitored by our GCA Committee.

## Managing supplier risks

Our procurement policy commits us to 'efficient, effective, ethical and sustainable procurement' and sets out our expectation that all our employees, contractors and business partners including suppliers will uphold ethical business practices and abide by relevant legislation. We manage risks associated with our procurement by requiring international suppliers (that we consider have higher exposure to modern slavery risks) to complete a modern slavery questionnaire and deed poll during the tender process. The questionnaire includes questions relating to key modern slavery risk factors, such as use of recruitment fees and employer provided accommodation. The deed poll 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.

## Strengthening our supplier management system

As part of managing our suppliers effectively and increasing efficiency on our projects, John Holland has prioritised digitising our procurement processes. We are developing an integrated, automatic system, which will perform a supply chain risk assessment for the top 2,000 suppliers (covering 80% of our spend). This risk assessment will include modern slavery related content and will feed into a live dashboard to monitor supplier risks and assist with executive oversight.

### **Maintaining a whistleblower mechanism**

Our whistleblower mechanism provides a safe and anonymous way for our employees, contractors, suppliers, and other stakeholders to report potential breaches of our Code and applicable laws, including in relation to modern slavery. Reports can be made through an independent Speak Up Line or directly to the Company Secretary and Corporate Counsel, or the Privacy Officer, and we take steps to protect complainants from retaliation. During the reporting period, no reports were received relating to modern slavery or labour rights more broadly. Whilst pleased with this result, we recognise that 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. We promoted the establishment of the whistleblowing mechanism to our employees in 2019, including through emails, intranet posts and an FAQ document. Further, external suppliers and contractors are directed in their contracts to our Code, which includes information about accessing the whistleblower mechanism.

### **Identifying and filling possible gaps**

As part of our commitment to continuous improvement, we engaged a business and human rights advisory firm to undertake a gap analysis of our policies and processes relating to modern slavery and develop a three year roadmap for action. The gap analysis included reviews of 30 key policies and documents and interviews with 10 key business functions. Key recommendations included updates to reinforce a zero-tolerance approach to modern slavery, development of a supplier code of business conduct and human rights policies, and the development of tools and updated training modules for employees and contractors on modern slavery awareness. We are actively considering the key recommendations from the gap analysis and reviewing our compliance and policy framework.

### **Collaborating with our partners**

We work collaboratively with our business peers to build our response to modern slavery through the Infrastructure Sustainability Council of Australia (ISCA) Road Sector Modern Slavery Coalition. The Coalition aims to support collaborative solutions to modern slavery risk management, drive industry good practice to support modern slavery compliance, and build members' capacity to manage modern slavery risks. During the reporting period, we worked with Coalition members to consider modern slavery risks in the sector with a further focus on identified risks associated with the procurement of PPE and bitumen.

### Our values

Taking action to assess and address our modern slavery risks aligns with our purpose and values.

By taking steps to respond to modern slavery risks in our operations and supply chain, we support our purpose to *help improve lives*.

In keeping with our values, we aim to *think deeply* about what we do and how it affects lives, including in relation to modern slavery.

We also recognise that *imaginative action* is needed to eradicate modern slavery from global supply chains and that our actions to address modern slavery and other human rights and sustainability issues supports our commitment to long term, *future-focused* approaches.

## Transforming lives

Purpose

**Our Why**

We're up for the challenge of improving lives

Values

**Our How**

Caring  
Empowering  
Imaginative  
Future-focused

Proposition

**Our What**

People-centred solutions to complex challenges and opportunities



**Caring**

We care deeply about what we do and how it affects lives



**Empowering**

We gain trust through action



**Imaginative**

We push the boundaries



**Future-focused**

We're in it for the long, long term

## Case study: Integrating modern slavery into our sustainability strategy

We understand the importance of integrating our response to modern slavery into broader work across our business to enhance our sustainability approach. Critical to our sustainability strategy is focusing on the right social, environmental, economic and governance priorities.

Throughout 2019, we spent time understanding how we could align our business to the Global Reporting Initiative (GRI) reporting framework and the United Nations Sustainable Development Goals, including by conducting a materiality assessment.

As part of this materiality assessment, we surveyed 137 key internal and external stakeholders. This involved identifying material priorities, evaluating, and prioritising identified issues within a workshop environment and ranking their impact based on short, medium and longer-term impact and value creation.

The assessment identified 12 economic, environmental, social and governance topics of most importance to John Holland. These 12 indicators include two topics directly relevant to our response to modern slavery: 'conducting business ethically' and 'protection of human rights'. Other topics, such as 'maintaining a sustainable supply chain' and 'protecting work health and safety' are also relevant to our actions to prevent modern slavery in our supply chain and on our worksites.

As we progress on our sustainability strategy and actions, we will engage with our stakeholders to ensure the topics are aligned with our business needs and stakeholder priorities.

- 1** Protecting work health and safety
- 2** Conducting business ethically
- 3** Attracting and retaining skilled employees
- 4** Local environmental protection and enhancement
- 5** Engaging and investing in local communities
- 6** Maintaining a sustainable supply chain
- 7** Protection of human rights
- 8** Reducing GHG emissions
- 9** Maintaining a diverse workforce
- 10** Reducing the use of water, energy and materials
- 11** Ensuring resilience to climate change
- 12** Maintaining sustainable business growth

# Assessing our effectiveness and future plans

We recognise the importance of taking a continuous improvement approach to managing our modern slavery risks and are working to enhance the scope and sophistication of our response.

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 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
- considering how our response compares to good practice responses from business peers in our sector and more broadly, including through the ISCA Coalition
- evaluating whether our policies are fit for purpose, including through processes such as the modern slavery gap analysis (more information about the gap analysis is set out on page 15).

We plan to further strengthen our response to modern slavery in the future, including by:

- implementing an integrated, automatic vendor management system
- introducing a new supplier code of business conduct to set clear standards for suppliers in relation to modern slavery and other relevant issues
- revising our Code to address recommendations made as part of our third party modern slavery gap analysis
- developing tools and updated training modules for employees and contractors on modern slavery awareness.



## Consultation and approval

This Statement was developed in consultation with each of the reporting entities covered by the Statement (as listed in Appendix B) and other relevant controlled entities.

A draft of this Statement was reviewed by one or more directors from each reporting entity and each controlled entity.<sup>4</sup> Each reporting entity also shares a common company secretary, who was actively involved in the drafting of this Statement.

This Statement was approved by the Board of John Holland Group Pty Ltd on 23 June 2021.



**Joe Barr**

**Director and Chief Executive Officer**

**29 June 2021**

<sup>4</sup> Directors may serve on the boards of multiple entities within the John Holland group.

# Appendix A

## How our Statement addresses the Modern Slavery Act's requirements

<b>Modern Slavery Act requirement</b>	<b>Reference in this Statement</b>
Identify the reporting entity	'About this Statement' (page 2) 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 undertakes Queensland government and related bodies construction contracts.
John Holland Rail Pty Ltd	John Holland Rail Pty Ltd is the contracting entity for the NSW Country Regional Network (CRN) operations and maintenance contract for Transport for NSW.

[johnholland.com.au](http://johnholland.com.au)

**JOHN**  
**HOLLAND**