JOHN HOLLAND

Modern Slavery Statement 2025

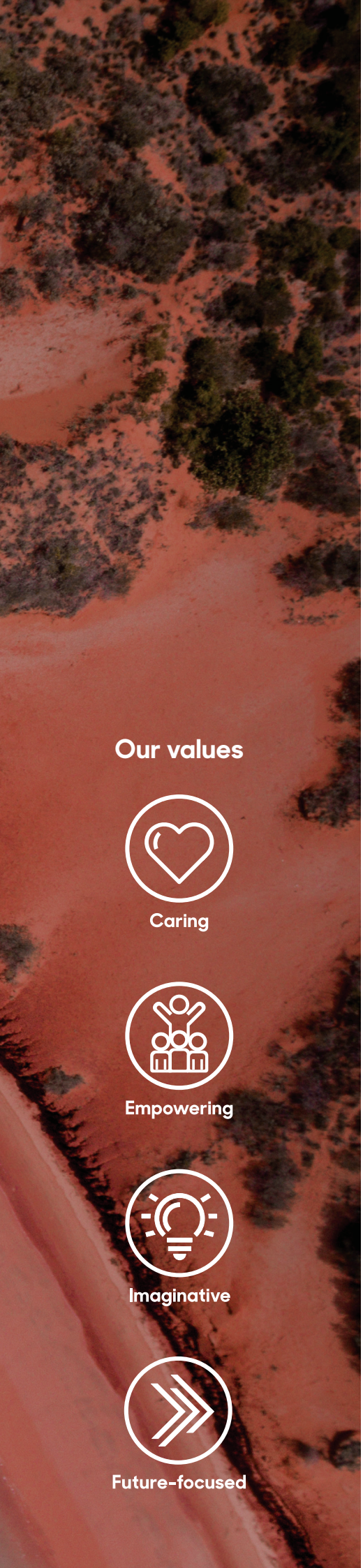




Front cover photo: Arden Station, Metro Tunnel, Victoria

Acknowledgement of Country

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



Our values

Caring

Empowering

Imaginative

Future-focused

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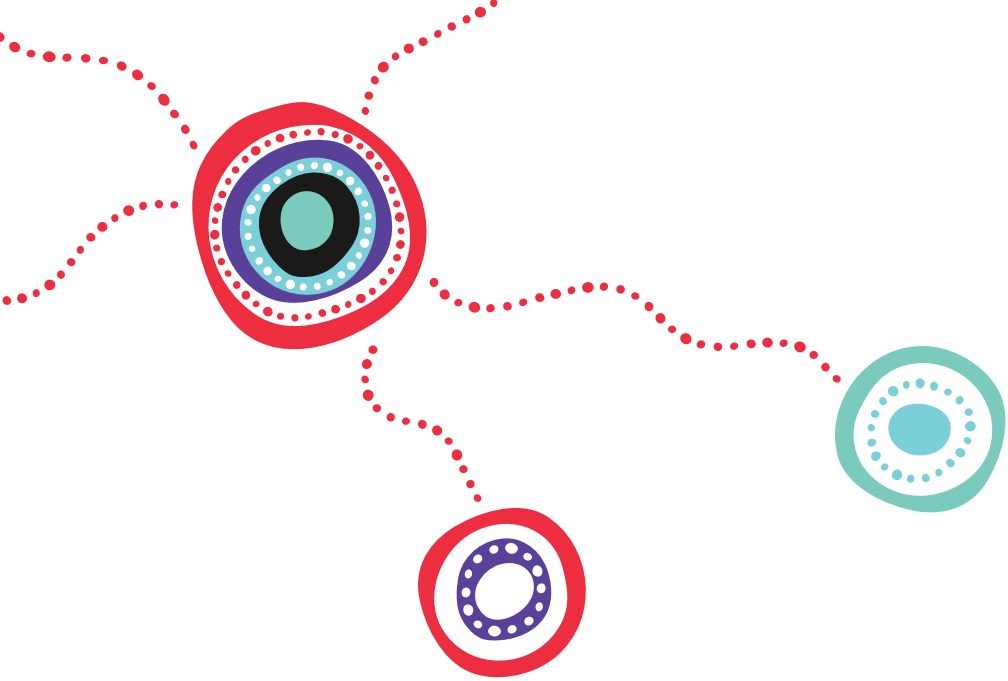

About this Statement

John Holland has prepared this Modern Slavery Statement (Statement) to address the requirements of the Australian Modern Slavery Act 2018 (Cth) (Act). The reporting period covered by this Statement is 1 January 2025 to 31 December 2025.

This Statement applies to the following five reporting entities:

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

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

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

The Board of John Holland Group Pty Ltd approved this Statement on 25 May 2026. 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).

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 Nick Miller, Chief Executive Officer. This Statement has not been externally assured.

We welcome feedback on how John Holland is addressing this challenge at secretariat@jhg.com.au.



Message from our CEO

At John Holland, our purpose is to transform lives.

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

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

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

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

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

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

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

Nick Miller

Chief Executive Officer

01

Our structure, operations and supply chain

Who we are

Since our foundation over 75 years ago, we have been committed to supporting communities around Australia by building infrastructure that transforms lives.

As one of the nation's leading infrastructure and engineering companies, we have helped shape the Australia we know today, from Parliament House in Canberra to the Alice Springs to Darwin Rail Link, from the MCG's Great Southern Stand to Sydney Metro. We continue to push boundaries of innovation and forward-thinking design, as well as delivering the best result for our customers, our community.

We acknowledge that our operations have a wide impact on communities, our vendors, and the environment. We take all necessary steps to ensure our business is conducted ethically and sustainably, and this includes identifying and mitigating the risk of modern slavery 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 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 Group's construction, operation, and maintenance activities.

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

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

Our operations

Our primary focus is to deliver positive change through future-focused infrastructure that helps people connect, travel and live safely and efficiently.

Our operations across Australia and New Zealand include:

- **Infrastructure:** Delivering and maintaining infrastructure, such as major roads and bridges, energy infrastructure, tunnelling, and water and wastewater treatment solutions.
- **Rail & Transport:** Rail and transport operations and maintenance and the construction of rail assets.
- **Building & Development:** Major building projects such as correctional facilities, hospitals, stadiums, education and research facilities, and commercial and mixed-use developments.
- **Technology and innovation:** Embedded across our business, our technology and engineering professionals are developing smarter, more efficient ways of delivering for our customers and stakeholders.

We are involved in 78 projects across Australia and New Zealand. Recently, we have delivered some of Australia's largest infrastructure projects, including the Metro Tunnel and West Gate Tunnel in Melbourne, and continue to work on other significant projects across rail, water, building and renewables, as well as operating and maintaining buses, trams and trains. More information on our operations and projects is available on the John Holland website.

To support our operations, we employ over 5,750 employees in roles related to engineering, project management, site supervision and other internal corporate functions such as commercial, legal, finance, people, risk, strategy, and IT. We also engage contractors 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 requirements of the project.

Key information about our operations and locations is set out in Figure 1.1 and 1.2.

Our governance

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

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

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

01

Our operations

78
projects across Australia and New Zealand

$25.9b
work in hand

5,753
direct employees

$13.1b
new work won in 2025

Figure 1.1 – Operation and supply chain metrics

Our supply chain



Over
7,500
suppliers in 2025

Approximately
220
international suppliers in 2025

Over
$5.9b
supplier spend

$192m
for First Nations businesses and social enterprises

All information in this infographic is for the year ending 31 December 2025 (the reporting period covered by this Statement).

01

Our projects and offices

We have 78 projects in Australia and New Zealand across the following sectors:

Infrastructure

- Airports
- Ports and marine
- Roads and bridges
- Tunnelling
- Water and wastewater
- Power & energy
- Pumped hydro

Rail & Transport

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

Building & Development

- Education and research
- Health and aged care
- Justice and corrections
- Sports, tourism and culture
- Future cities
- Property development





Corporate Offices

Corporate Head Office (Melbourne)
Wurundjeri Country
Level 9, 180 Flinders Street,
Melbourne 3000, Victoria

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

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

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

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

Spotswood (Rail and transport) Office
Wurundjeri Country
1 McLister Street,
Spotswood 3015, Victoria

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

Figure 1.2 – Key locations

Our supply chain

An efficient and resilient supply chain is critical to delivering the transformative infrastructure projects we undertake. In 2025, John Holland procured $5.9 billion worth of goods and services from more than 7,500 direct suppliers, ranging from small, local businesses to multinational corporations.

In 2025, 99% of our procurement expenditure was with Australian businesses, while the remaining percentage is made up of vendors located in New Zealand, Singapore, United Kingdom, United States, Germany, and other countries around the world.

International supply chains add complexity and uncertainty to the procurement process, involving increased logistical planning, multiple vendor tiers, and transport through various international boundaries. Engaging international vendors also increases our exposure to the risk of modern slavery in our supply chain.

One way in which we manage this risk in international supply chains is through the Global Slavery Index (GSI). The GSI is a key indicator that John Holland uses to assess our international vendors and guide our strategy when it comes to international procurement.

Developed by the international human rights organisation Walk Free, the GSI provides national estimates of modern slavery for 160 countries. The report provides a comprehensive breakdown of the estimates, and evaluates how governments are responding to modern slavery. The GSI Index in 2023 estimated that 50 million individuals were living in modern slavery.

Australia, for example, has a GSI regional ranking of 1.6, indicating that per 1000 people, approximately 1.6 people are working in slavery conditions, while the United States has a classification of 3.3 on the GSI, one of the highest of our international vendors however still considered as a low prevalence of modern slavery in the world.

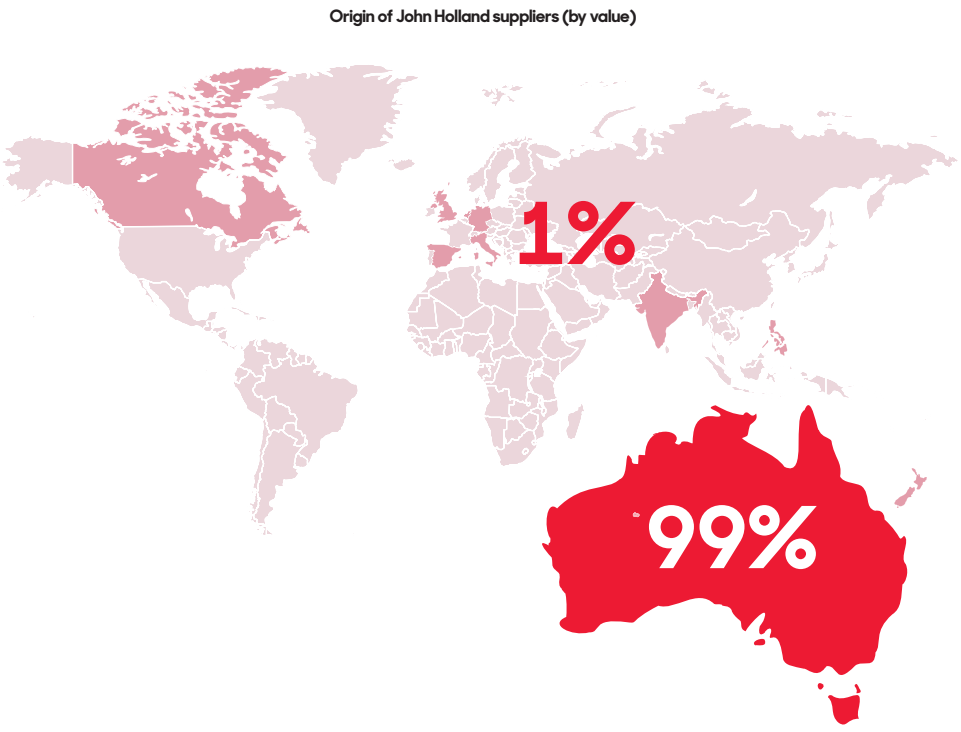

Figure 1.3 – Origin of John Holland vendors

Since 2019, to support data from the GSI, we have also established a panel of certification and inspection consultancies which provide auditing services for our international suppliers. This panel consists of reputable firms such Bureau Veritas, DNV and LRQA, ensuring a comprehensive assessment of risk, quality, and integrity in the supply chain. This mandatory process has been integrated into John Holland's processes to address the complexities and risks of global sourcing.

John Holland procures goods and services across 12 key categories. Figure 1.4 highlights our expenditure across these categories in 2025. Our biggest procurement spend category in 2025 was civil sub-contracts, with over $3 billion spent on services including bulk earthworks, pavements, drainage and reinforced concrete structures.

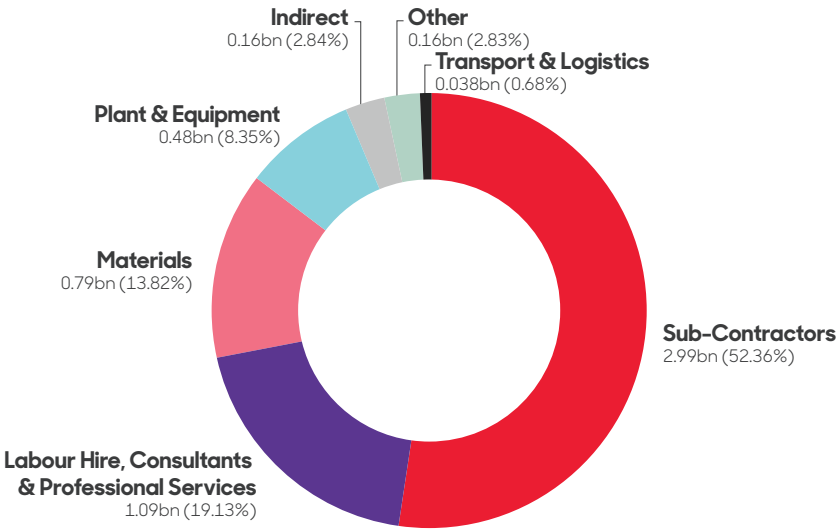

Figure 1.4 – John Holland expenditure across key categories

Category	Category examples	% Spend (by value)
Civil subcontracts	Contracts to construct bulk earthworks, pavements, drainage and reinforced concrete structures	39 %
Mechanical and electrical systems	Heating, ventilation, air conditioning and control systems, electrical wiring, transformers, switchboards and sub-components making up the systems	16%
Professional consulting services	Engineering design services, as well as environmental, inspection and construction services	12%
Plant and equipment	Hire of equipment with and without services to operate, as well as purchase of equipment like tunnel boring machines and light towers	7%
Labour hire	Short-term and long-term contingent labour for our projects	6%
Concrete	Ready-mix and precast concrete, reinforcing bar and mesh	5%
Steel	Heavy, medium and light steel products from bridge girders through to handrails and streetlights	4%
Industrial consumables	Gases, welding consumables, fasteners, small tools and Personal Protective Equipment (PPE)	3%
Traffic management	Materials and signalling, communications, and control systems	2%

Table 1.1 - Procurement Spend

In 2025 we continued with an open dialogue with our strategic vendors, through the establishment of Framework Agreements and bi-monthly business review meetings. This approach contributes to improved communication and information sharing with our supply chain, raising awareness about modern slavery risks.

Procurement systems, procedures and policies

Our procurement systems and policies are managed by a central procurement team, which also oversees strategic procurement activities including international procurement. John Holland's Business Units are responsible for project procurement activity and reporting, and controlled entities use the same procurement policies and frameworks.

John Holland also forms joint ventures (JV) to deliver some projects. In some cases, we act as the principal contractor, using our own processes, systems, and policies to manage operations. Where we are not the principal contractor, operations may be managed using our JV partner's processes and systems. Regardless of the JV structure, our partners are required to maintain high ethical standards, including compliance with our Procurement Policy and Code of Business Conduct.

To ensure a robust approach to modern slavery prevention and adherence to ethical procurement practices, John Holland has established several key internal controls, procedures and policies. These controls are designed to foster transparency, accountability, and respect for human rights across all areas of our operations. Table 1.2 outlines our core internal controls and their relevance to combating modern slavery.

Document	Relevance to Modern Slavery
Procurement Policy	Our commitment to ethical business practices, compliance with laws and codes, and understanding of procurement risks directly addresses modern slavery by promoting transparency and accountability in our business operations. By developing and maintaining rigorous selection and review processes for suppliers, we aim to manage and mitigate the risks of modern slavery in the supply chain. Furthermore, aligning procurement decisions with the triple bottom line ensures consideration of social impacts, including the welfare of workers, which is essential in combating modern slavery.
Procurement and Subcontract Management Manual	Our Procurement and Subcontract Management Manual addresses modern slavery risks in procurement processes including guidelines and tools like the Modern Slavery Questionnaire for International Suppliers to ensure sustainable and ethical procurement practices.
People Policy and Ethical Behaviour	Our People and Ethical Behaviour Policies ensure that all employees understand and adhere to John Holland's values, Code of Business Conduct, and other policies support a workplace free of exploitation. Personal accountability for actions is a key aspect of ensuring that modern slavery is not tolerated within an organisation or its supply chains.
Diversity and Inclusion Policy	Our Diversity and Inclusion Policy fosters a workplace that values diversity, equity, and inclusion, setting out that all employees must be treated with respect and fairness, which is crucial in preventing exploitation and abuse. Moreover, our commitment to diversity and inclusion reflects a broader dedication to human rights and social justice, which are key to combating modern slavery practices.
Code of Business Conduct	Our Code of Business Conduct determines that we respect human rights and take a zero-tolerance approach to all forms of modern slavery. According to the Code, John Holland will ensure that its employees are paid and otherwise treated in accordance with their contracts of employment, applicable industrial instruments and modern awards and will ensure as best it can that its subcontractors and suppliers are compliant with applicable industrial codes of conduct. The Code of Business Conduct is a public document available at John Holland's website, under Governance.
Supplier Code of Conduct and training	Our Supplier Code of Conduct prohibits the use of modern slavery (including forced labour) and child labour in our suppliers' operations and supply chains and mandates proactive steps to manage potential risks. It also mandates suppliers to provide means for workers to safely and anonymously make complaints relating to unsafe or unfair working conditions (including modern slavery or other exploitation). Workers must not be exposed to retaliation or fear of retaliation for making a complaint. All our suppliers can access the Supplier Code of Conduct at John Holland's website, under Governance. Suppliers are also encouraged to partake in the online training available at the same heading "Supplier Code of Conduct."
Whistleblower Standard	Our Whistleblower Standard provides clear guidance on how to report wrongdoing in a manner which supports individuals in making a disclosure that is protected under the Corporations Act 2001 (Cth) (Corporations Act) and the Tax Administration Act 1953 (Cth) where applicable (Tax Administration Act) (Whistleblower Protections).
Business Conduct Reporting Procedure	This Procedure outlines the reporting procedure for Business Conduct issues, including those relating to modern slavery.
Modern Slavery Questionnaire	Through the Modern Slavery Questionnaire, John Holland requires all international and high-risk suppliers to provide detailed information about their practices, helping us identify and address modern slavery risks in our supply chain.
Deed Poll (Modern Slavery)	The Deed Poll (Modern Slavery) is a formal document that vendors must complete to confirm their compliance with modern slavery laws and John Holland's ethical standards. This document is part of the procurement process for international and high-risk vendors and is used to evaluate whether to award contracts to vendors based on their commitment to preventing modern slavery.
Modern Slavery Awareness Poster	The Modern Slavery Awareness Poster is available for printing and affixing in public areas of all John Holland's offices and sites. This material aims to provide education on the signs of modern slavery, encourage reporting of any concerns, and to promote a culture of transparency and accountability within John Holland's operations and supply chains.

Table 1.2 - John Holland policy and procedure controls

Social procurement

Our commitment to maximising opportunities for disadvantaged or marginalised groups through social inclusion remains strong. We do this by actively seeking opportunities for disadvantaged individuals, social enterprises or First Nations businesses in our projects. We appreciate the positive impact these partnerships have on local communities, increasing economic participation by disadvantage communities and contributing to a more inclusive and diverse economy.

To support our commitment, we are members of some of the key certifying bodies and social enterprises in Australia. Industry bodies such as Social Traders, Supply Nation and Kinaway are instrumental in linking us with certified social and First Nations vendors, diversifying our supply chain and connecting our project with local First Nations businesses.

Our expenditure with First Nations businesses and social enterprises exceeded $192 million in 2025, and we continue to take steps to increase engagement and spend in this area. As an example, in 2025, our Social Impact team exceeded local content requirements for several regional projects and ensured that social benefit suppliers of First Nations businesses, social enterprises and disability enterprises were integrated into the supply chain. As a result, multiple businesses were upskilled in tendering for our projects and have gained successful experience on Tier 1 projects either via supply or via providing services for the projects.

While we acknowledge there can be a higher risk of modern slavery within First Nations supply only services, our teams have been identifying businesses that create or purchase products locally and an emphasis on social enterprises and local businesses enabling us to identify and mitigate risks effectively through active monitoring and due diligence.


Easy access gate
Tap here to pay
Tap here to pay

02

Identifying the risks of modern slavery practices in our operations

Modern Slavery is an umbrella term used by the United Nations to cover a range of serious coercive and exploitative practices, such as forced labour, debt bondage, forced marriage, and human trafficking. It refers to instances of exploitation in which a person is unable to make independent choices through the use of threats, violence, coercion, deception, and abuse of power.

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

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

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

The results of our risk assessment workshop are outlined in Table 2.1.

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

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

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

1. By directly **causing an impact** through their actions or inactions

   Example: A construction company engages in practices that constitute forced labour by employing workers under conditions that involve coercion, threats, or lack of freedom to leave.

   Possible expected response: To stop or prevent impact by establishing clear policies and human resources due diligence.

2. By **contributing to an impact** through activities that enable another entity to cause harm

   Example: A construction company requires a supplier to reduce costs to an extent the supplier is underpaying workers to keep costs lower. The construction company ignores any risks presented by the significant cost reduction.

   Possible expected response: To stop or prevent contribution by performing due diligence and supporting business partner in action.

3. By **association** with an impact indirectly through business relationships that are linked to operations, products, or services.

   Example: A construction company engages with a supplier of PPE that purchases items from overseas factories that use exploited labour.

   Possible expected response: To build or to use leverage to avoid and mitigate impacts.

Project area	2024 Risk Assesssment	Relation to continuum of involvement	Planned Mitigation Actions
Remote worksite camps (under John Holland control)	Low risk	Primary	Utilisation of established camp operators. Completion of robust tenders to appoint camp operators. On-going site walks and visits.
Non-construction (EBA) labour	Low risk	Primary	Standard John Holland practices and T&Cs to manage operations.
Design Services (onshore)	Low risk	Primary	Follow revised procurement procedure including questionaire and contractual requirements when refreshing framework agreements. Audit any agency if there is indication of risk. Central prequalification.
Labour-hire agencies	Low risk	Primary	
Recruitment of visa holder workers	Low risk	Primary	Review completed externally as part of the transaction with visa holders.
Bulk materials (locally supplied)	Low risk	Secondary	Follow revised procurement procedure including questionaire and contractual requirements when refreshing framework agreements.
Transportation	Low risk	Secondary	Follow revised procurement procedure including questionnaire.
Catering suppliers for events/offices	Low risk	Tertiary	
Waste disposal (offshore)	Low risk	Tertiary	
Survey services	Average risk	Primary	Framework Agreement panels with John Holland T&Cs.
Remote worksite camps (not under John Holland control)	Average risk	Secondary	Utilisation of established camp operators. Completion of robust tenders to appoint camp operators. On-going site walks and visits.
Site security services	Average risk	Secondary	Central prequalification
Cleaning services	Average risk	Secondary	
Traffic controllers	Average risk	Secondary	
Design services (offshore)	Average risk	Tertiary	Alignment with trusted partners. John Holland requirements incorporated into agreement with consultants.
Submission services	Average risk	Tertiary	
Imported fabricated steel	Average risk	Tertiary	Questionnaire completed by suppliers. Pre-engagement audits and site visits completed as required.
Bitumen supply	Average risk	Tertiary	
Supply of solar panel, battery supplies for project sites	Average risk	Tertiary	
General plant and equipment	Average risk	Tertiary	Questionaire completed by suppliers. Pre-engagement audits and site visits completed as required. Preference for local reputable suppliers.
PPE and site clothing manufacture	Average risk	Tertiary	
Multiple tiered sub-contractors	High risk	Secondary	Robust on-boarding practices in place ensuring correct paperwork in place. Modern Slavery requirements to be incorporated into the site induction process.
IT Purchasing	High risk	Tertiary	IT sustainable procurement policy established.

Table 2.1



As highlighted in the assessment, the construction sector is susceptible to modern slavery, particularly in the production of materials and provision of services in countries where forced labour and human rights violations have been reported.

Areas of John Holland's procurement activity that pose the highest risks are IT purchasing, and multiple tiered sub-contractors. It was also acknowledged during the workshop that the risks for individuals subject to modern slavery include physical harm as well as other risks that impact their physical and psychological wellbeing and safety.

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

Our partnership with Purpose Bureau – a deeper understanding of our supply chain

In Q3 2025 Purpose Bureau was re-engaged by John Holland. Purpose Bureau is an environmental, social and governance (ESG) consultancy that helps organisations understand ESG risks of their supply chain. Purpose Bureau analysed all vendors that John Holland has current spend with in the year Q3 2024 to Q3 2025.

This report confirmed that 99.8% of our direct supplier entities were based in very low risk jurisdictions, with Australia being the majority, while a small portion of our spend (less than 0.1%) was associated with medium risk countries such as Italy and Hong Kong.

The report also demonstrated that a significant portion of our spend was with medium-risk industry sectors such as heavy construction. Auxiliary areas like waste treatment and disposal services, classified as high-risk by the report, represent less than 2% of our spend.

Purpose Bureau has also provided a vendor-specific global slavery exposure report by using the composite of industry-specific and region-specific risk exposure data. According to these metrics, over 97% of our expenditure and 95% of our suppliers are classified as low or very low exposure to global slavery. Only 0.2% of our spend was classified as high exposure. As shown in Figure 2.1, our modern slavery exposure extends beyond our direct (Tier 1) vendors, indicating the importance of understanding our vendors' approach to modern slavery risk management in their own supply chains.

Purpose Bureau compared the risk of exposure with the positive actions that the vendor is implementing to manage their exposure to modern slavery and human rights violation. The result of this analysis has provided John Holland with our final Modern Slavery Risk Rating. Though classifying over 80% of our supply chain as low or very low risk, the study also demonstrated an increase of vendors classified as medium risk: those who have taken some steps to manage their global slavery exposure but can do more considering the level of exposure.

The findings of this initial report will be compared against Purpose Bureau's subsequent report expected in November 2025, to inform our approach to vendor risk assessment and due diligence. Our partnership with Purpose Bureau significantly increases our ability to monitor our vendors and supply chain to identify emerging risks and positive actions implemented to reduce instances of modern slavery. Our goal is to adopt a collaborative approach to mitigating actions and positive change and prioritise vendors and supply chains that share our commitment to eliminating modern slavery.

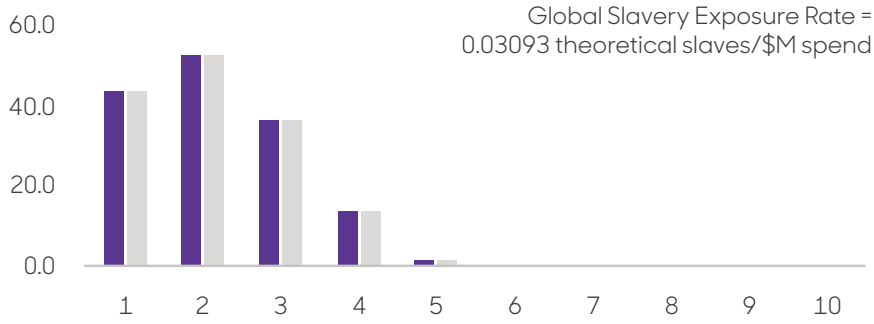

Figure 2.1 – Number of theoretical Slaves by Supply Chain Tier

Case study: Northwest Hub Alliance

The Northwest Treatment Hub Growth Program: A Commitment to Sustainable Development and Ethical Practices

John Holland, Stantec, and KBR are partnering with Sydney Water to deliver the Northwest Treatment Hub Growth Program – an ambitious brownfield treatment program that will begin with a substantial $595 million upgrade of the Rouse Hill and Riverstone Water Resource Recovery Facilities. This transformative 10-year program aims to significantly increase wastewater treatment capacity across three of Sydney's water facilities, addressing the rapid growth in Sydney's northwest and enabling the creation of additional 200,000 new house connections.

Central to the program's mission is a steadfast commitment to sustainability and community engagement. The project not only seeks to enhance the wastewater infrastructure but also to elevate the quality of life for residents through inclusive and environmentally conscious development practices. A cornerstone of this commitment is the program's proactive approach to addressing and mitigating modern slavery risks within its operations and supply chain.

A short time after the award of the project, the Northwest Hub Alliance project team commenced analysis of the procurement schedule to identify any suppliers of packages with a higher modern slavery risk. Building on the insights gained from this exercise, the project's procurement, workforce, and inclusion and participation teams undertook a rigorous evaluation of all trades involved in the project. Some of the trades categorised with increased likelihood of modern slavery occurrences were cleaning services, security guards, spray seal, fencing, clearing, and grubbing, traffic control, steel fixing, labouring, and scaffolding.

During the tender process, these categories identified as higher risk packages were subject to stronger due diligence and individual interviews during which additional documentation and commitments were requested from the suppliers, to ensure compliance to the standards defined in all John Holland's standard contracts.

This individualised assessment was fundamental for the project team to access greater visibility and understanding of the real conditions of employment of subcontractors and influence them under the approach of modern slavery and other contractual clauses, setting a higher standard for compliance and ethical behaviour among its partners.

Overall, the Northwest Hub Alliance's approach to modern slavery is an exemplary framework that underscores its commitment to sustainable development and ethical practices. By integrating comprehensive risk assessment, rigorous oversight, and proactive education, the project team sets a new benchmark for responsible infrastructure projects. This framework not only ensures compliance with modern slavery legislation but also serves as a model for other projects striving to uphold the highest standards of social responsibility and ethical supply chain management.

Further to its efforts in modern slavery, the project instituted a program to enhance the use of indigenous businesses. The project identified as many local indigenous businesses as practically possible and then mapped their offerings against the work that was being performed, then the work was packaged such that these businesses could bid for it and then they were included in the tender process.

By the end of 2025, 50% (by value) of the works were complete and the spend with indigenous businesses was $1.58m against a whole of project target of $1.56m, and it is projected that the project will almost double its target. This will provide an additional and unexpected boost to the local indigenous population.



03

Our actions to assess and address modern slavery risks

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

Several measures have been implemented to evaluate and mitigate the risk of modern slavery within our business practices and supply chains. These measures are outlined further in this section.

Assessing potential risks

An interactive Modern Slavery Risk Workshop, last conducted in 2024, included over 50 stakeholders from across the business, including procurement, commercial, sustainability, governance, and risk management.

The workshop contributes to the identification of possible risk areas and informs the development of action items to further strengthen our response.

Our engagement with Australia's largest ESG directory, Purpose Bureau, to assess and report on our supply chain. This assessment and conclusions are available on page 21. The findings and accompanying recommendations allow us to identify and prioritise areas where there is greater risk of modern slavery in the supply chain.

Setting clear standards for our people

Code of Business Conduct

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

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

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

Investigations into potential breaches of the Code of Business Conduct are monitored by our GCA Committee.

Procurement Policy

Our Procurement Policy directly addresses the risks of modern slavery and raises awareness about our stance in this matter. Our policy is clear about our commitment to ethical practices and the protection of human rights by mandating we *"Recognise, evaluate and implement measures to minimise to the greatest extent possible the risks associated with modern slavery within our operations and supply chain."*

Setting clear standards for our people (Cont.)

Procurement Manual

In 2024, we published our Procurement Manual, establishing general steps to be taken to avoid modern slavery risks within our supply chain by our projects. Some of the prescribed methods for managing these risks include vendor due diligence and remediation processes, collaboration with other stakeholders to support vulnerable workers, and the maintenance of modern slavery risk management throughout the project's life.

Modern Slavery Procedure

In 2024, we developed a specific Modern Slavery Procedure that is now in the final stages of approval and implementation. More than highlighting the challenges related to modern slavery, we aim to provide a clear guideline both to Corporate through our Modern Slavery Working Group, and to our Projects. This document aligns with the general guidelines established by our Procurement Manual and takes us further in mitigating risks and keeping appropriate data, with the goal of continuous improvement.

Setting clear standards for our suppliers

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

A Supplier Code of Conduct online training module is available on the John Holland website, providing our vendors understanding of minimum requirements related to modern slavery when working with John Holland. In 2025, we have also increased our visibility over the suppliers accessing the training available, making it possible to engage with the vendors post-training.

Managing supplier risks

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

The highest risk of modern slavery in our supply chain is through international procurement, as described on page 19. We manage this risk through third party inspection and certification of our international vendors, as well as requiring completion of a modern slavery questionnaire and deed poll during the tender process. This forms a range of modern slavery requirements that potential vendors must achieve before goods or services are procured.

In addition, our partnership with Purpose Bureau, detailed in page 21, and our new Modern Slavery Procedure, currently under review, will provide detailed guidance and actions our projects can take to manage our vendor risk.

03

Strengthening our supplier management system

The digitisation of procurement processes continued to be a key initiative in 2025, with an ongoing focus on our systems for comprehensive risk assessments of direct suppliers, including modern slavery risks. We also continue to work on enhancements in recognising certified local and First Nations suppliers through an automated linkage with certifying partners, bolstering project efficiency and supplier management.

Over 2023, 2024 and 2025, substantial progress has been made in our vendor relationship management, particularly with our strategic vendors. This strategy has been instrumental to improving communication and elevating awareness regarding the risks of modern slavery. By developing closer connections with our critical vendors, we promote greater transparency and information sharing. This ensures greater oversight across various vendor tiers, enabling swift resolution of issues and promoting business practices that are both sustainable and responsible.

Maintaining a whistleblower mechanism

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

Our Whistleblower Standard is available on our website, and clearly explains:

- Reporting structure and process, including relevant email and contact phone numbers
- the protections available (such as confidentiality of identity and protection against victimisation)
- how we will support and protect whistleblowers
- how we will investigate reports, which are overseen by the Company Secretary, Privacy Officer and the GCA Committee
- how we will ensure fair treatment of employees involved
- how the Whistleblower Standard is communicated.

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

Continuous Improvement approach

Since undertaking a gap analysis of our policies and processes relating to modern slavery in 2020 we have continued to implement actions suggested in the initial roadmap.

A Modern Slavery Procedure, developed in 2024 and currently under review, includes a standard John Holland Modern Slavery awareness poster aimed at increasing awareness across the business. The procedure will address some of the gaps previously identified, with the establishment of KPIs and allowing for a deeper engagement with our suppliers.

A new analysis will be completed in 2026 to refresh the gap analysis and ensure continuous improvement approach is sustained.

Responding to modern slavery incidents

Any instance of modern slavery identified or reported in our operations or supply chain is treated seriously and actioned. A proper and thorough investigation would be undertaken in accordance with our established policies and procedures, including the Code of Business Conduct and Whistleblower Standard.

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

We are committed to continuing investigations into potential remediation measures and services, with further details contained in Section 04 below.

03

How we raise awareness about modern slavery

Raising awareness about modern slavery is a critical step in combating this global issue. In 2025, we continued with our commitment by expanding our communication channels in relation to modern slavery.

Project kick-offs

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

Procurement cohort

Modern Slavery was the topic of discussion in four of the six bi-monthly meetings hosted by Strategic Procurement over 2025. These cohort meetings are a valuable mechanism for information sharing and performance review and alignment for procurement personnel and project teams across the business.

Modern Slavery Working Group

The Working Group is comprised of key stakeholders from the People, Strategic Procurement and Corporate Governance teams. In 2025, the activities of the Working Group provided a collaborative platform for members to share experiences and strategies and ensure continuous progress and follow-up on related activities.

Modern Slavery support page on SharePoint

A specific Modern Slavery page, available through SharePoint, is accessible to all John Holland employees and combines in one single page all documents and policies related to modern slavery. This resource supports our project teams in accessing information about how to understand and mitigate modern slavery risks within our supply chains.



Our Supplier Code of Conduct

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

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

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

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

2025 Activities Highlights

In our previous Modern Slavery Statements, several actions to improve our outcomes in assessing and managing the risks of modern slavery were identified. The status of our planned actions is provided in Table 3.2.

Action	Status
Implement an integrated, automatic vendor management system that will allow us to better control and assess risks across our supplier base	(50%) In progress, will go live in 2026
Continue to develop (and implement) an Operational Management System that will allow us to enhance our monitoring of compliance with our Supplier Code of Conduct	(40%) In progress
Update all our Framework Agreements and standard contracts with the requirement to comply with our Supplier Code of Conduct and modern slavery laws and practices	(100%) Up to date and ongoing
Include modern slavery during all Strategic Procurement launch presentations, strengthening the focus on recognising and avoiding modern slavery practices within our supply chain	(100%) Completed
Develop and implement a procedure for sustainable IT procurement	(100%) Completed
Engage with organisations involved with remediation	(50%) In progress
Develop modern slavery specific page on our intranet	(100%) Completed
Develop and implement modern slavery specific procedure	(90%) In progress

Table 3.2 – Progress towards 2023 actions

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

Women and girls are uniquely vulnerable to becoming victims of modern slavery and are estimated to comprise over half (54 per cent) of modern slaves globally. [1]

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

In December 2025 our 2021-2025 **Gender Equality Strategic Plan** concluded. *In 2026 we begin revising our new Gender Equality Strategy to align with WGEA best practice. We also published our summary of progress for this previous strategy.* Some of our gender equality achievements included:

- **Gender pay equity review:** we completed our annual gender pay equity review, which assessed company-wide remuneration levels to understand the extent of and help define actions to address any organisational gender pay inequity. Additionally, we are working to close our gender pay gap. In 2024-2025, we reported a 6.2 percentage point reduction in the average total remuneration gender pay gap relative to 2021-2022 levels, a positive change which can be attributed to the promotion of women into senior leadership positions, recruiting more women across our business and driving other gender equality indicators like flexible working, parental leave and harm reduction. Lowering our Gender Pay Gap is a key measure of our Inclusion Strategic Plan.
- Continuing to revise and ensure appropriate support for those people who experience Family and Domestic Violence (FDV). In addition to an annual review of our processes to continuously improve we also engaged Challenge DV to undertake a review of our policy, implementing further best practice and assistances to help those employee who experience violence. Current supports for employees include additional financial and accommodation support (emergency relief voucher to the value of $300 and up to five nights' accommodation for employees and their dependents), supporting flexible working arrangements, offering a change of work mobile number/email, and providing specialist Employee Assistance Program support.
- **Miscarriage and infant loss:** we offer two new compassionate leave entitlements for miscarriage and infant loss, including two weeks of paid leave for employees who have experienced miscarriage and eighteen weeks of paid leave for employees who have experienced the loss of a child aged between birth and two years of age.
- **Promoting gender equality through our sphere of influence, including updating our Supplier Code of Conduct** to help drive gender equality throughout our supply chain. Our updated Supplier Code of Conduct now requires suppliers to commit to *'make all efforts to create gender equality, comply with the Workplace Gender Equality Agency (WGEA) Act and to look for opportunities to boost equality within business. This includes working towards equity in remuneration, training and development and career pathways.'*

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

In 2026 we achieved again the WGEA Employer of Choice for Gender Equality Citation, recognition of the work and actions we are doing to enhance gender equality across our company. This citation will cover John Holland untill 2028 and we'll be working to meet three standards: Continuous Improvement, Employee Experience and Policy and Education.

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



04

Assessing our effectiveness and future plans

John Holland is committed to continuous improvement of our modern slavery risk identification and management strategy. We aim to continually make our plan stronger and smarter.

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

- Monitoring and analysing data from our key indicators, such as the number of modern slavery related reports made through our whistleblower mechanisms and modern slavery questionnaires and deed polls completed by international vendors
- Reviewing all overseas inspections performed with international vendors
- Considering how our response compares to good practice responses from business peers in our sector and more broadly, including through the ISCA Coalition
- Evaluating our policies to ensure they are fit for purpose, including through processes such as the modern slavery gap analysis (see page 21 for further details).

Our goal is to continue the progress in our response to modern slavery. Our main initiatives for 2026 are to continue the work outlined in the four main pillars of 2024, as described on the following page.

Improved supplier performance and awareness

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

John Holland is upgrading its operational management systems for a more integrated approach to partner and supplier management. Centralising information will help manage risks and ensure suppliers meet ethical standards and regulations. The new OMS will improve monitoring of compliance with the Supplier Code of Conduct, maintaining ethical supply chains and preventing modern slavery through transparency and accountability.

Focus on knowledge, awareness and capacity building

Developing and implementing modern slavery project-specific workshops

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

Stronger governance

Implementing the Modern Slavery Procedure

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

Collaboration for remediation

Engaging with organisations involved in modern slavery remediation

Collaboration with organisations dedicated to remediation is essential in addressing modern slavery. These organisations tackle the complex challenges of modern slavery, providing guidance, support, and resources to companies aiming to eliminate this issue from their operations and supply chains. Initiatives such as the 'Modern Slavery Response & Remedy Framework' by Walk Free offer practical steps for companies. The aim is to advance these efforts through deeper engagement and prevention of future exploitation. Partnering with such organisations, within the limits of available budgetary resources, seeks to contribute significantly to the global effort to combat modern slavery.

05 Consultation and approval

This Statement has been developed in collaboration with each of the reporting entities covered by the Statement (as listed in Appendix B) and other relevant controlled entities. The Chief Commercial Officer and Chief Financial Officer have also reviewed this Statement, and it has been submitted to the GCA Committee for endorsement to the Board.

The Statement has been reviewed by one or more directors from each reporting entity and each controlled entity.[2] Each reporting entity also shares a common Company Secretary, who was actively involved in the drafting of this Statement.

The Board of John Holland Group Pty Ltd approved this Statement on 25 May 2026.



Nick Miller
Chief Executive Officer

[2] Directors may serve on the boards of multiple entities within the John Holland Group.

Appendix A

How this Statement addresses requirements of the Act

Legal requirement	Reference in this Statement
Identify the reporting entity	'About this Statement' (page 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.

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