

Higgins Coatings Pty Ltd Modern Slavery Statement

FY 2024-2025

1. Introduction

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) and covers the reporting period from **1 July 2024 to 30 June 2025**. Higgins Coatings Pty Ltd (“Higgins”) reaffirms its commitment to ethical conduct, human rights, and the eradication of modern slavery across its operations and supply chains.

2. Reporting Entity

Higgins Coatings Pty Ltd (ACN 009 342 572) is a privately owned Australian company headquartered at 1/297 Ingles Street, Port Melbourne VIC 3207. Higgins operates nationally across 22 branches and is wholly owned by Swanwick Holdings Pty Ltd.

3. Structure, Operations and Supply Chains

Higgins provides commercial painting and maintenance services. All employees are directly employed under Australian laws, modern awards and enterprise agreements.

Higgins does not manufacture paint or equipment, but procures materials and services from suppliers including:

- Dulux Group
- Haymes Paints
- United Access and Forklifts
- Cargo Crew
- Dell Technologies

Higgins then provides the labour to apply paint to its client’s buildings and related surfaces. To provide these services, Higgins has a branch network across all states and territories across Australia.

Speciality goods and services sourced from suppliers include paint, painting consumables and equipment, hire of machinery and height access equipment (for example, scaffold, Elevated Work Platforms). Larger spend items have a national procurement arrangement in place with suppliers, which assists in controlling spending with approved suppliers.

Goods are also procured to support business operations including stationary, PPE, clothing, merchandise, IT and communication hardware.

100% of purchases with suppliers during FY24-25 were sourced directly from Australian based businesses, with a mixture of larger suppliers being Australian and overseas owned.

4. Risks of Modern Slavery Practices

4.1 Operational Risks

Higgins continues to maintain 'low' operational risk due to direct employment practices and robust HR compliance. No labour hire is used.

- 100% of Higgins workforce is employed directly by Higgins in accordance with Australian laws, applicable modern awards and enterprise agreements.
- Higgins has a dedicated team of HR professionals to ensure compliance to Australian ER/IR laws, including a team of 2 full time employees who are screening and checking all employees and contractors

4.2 Supply Chain Risks

Overall, Higgins continues to maintain 'low' risk score in relation to its Supply Chain. A review using the Global Slavery Index identified Dell Technologies as a medium-risk supplier due to the nature of global electronics supply chains. Other suppliers were rated low to medium risk.

Dell was identified as a medium risk because it manufactures electronic components in China & Malaysia, specifically for laptops, computers and related hardware/software. It is a large international corporation with various practices in place to reduce modern slavery risks. Higgins has reviewed the Dell's 2025 Modern Slavery statement, which is very comprehensive and demonstrates its actions to reduce modern slavery risks, however, Higgins does not have full visibility into their supply chain and any potential modern day slavery practices.

5. Actions Taken in FY2024-25

5.1 Sedex SAQ Completion

Higgins is a member of Sedex. Higgins completed the Sedex Self-Assessment Questionnaire (SAQ), achieving a score of 3.7/5, providing insights into labour, health and safety, and modern slavery practices.

5.2 Policy and Governance Enhancements

- Updated the Higgins Subcontractor and Supplier Code of Conduct document to include contractor and supplier obligations around complying with Australian labour laws and Modern Slavery laws, plus their agreement to allow Higgins to conduct audits of compliance if asked

- Reviewed and updated ESG and Procurement Policies to include modern slavery clauses.
- Continued use of a third-party whistleblower service, Stop Line. All Higgins employees and contractors have access to a dedicated external Whistleblower company to voice concerns. Any disclosure will be treated confidentially and without fear of retaliation. It is by receiving and evaluating feedback and maintaining a culture of compliance that Higgins can assess the effectiveness of its practices and procedures
- Strengthened supplier prequalification and tender processes with the National Operations Manager.

5.3 Training and Awareness

- Delivered modern slavery awareness training to managers
- Planned rollout of Human Rights and Modern Slavery training to all staff.

5.4 Supplier Engagement

- Higgins has completed an annual review of its standard Heads of Agreement contract document, which contractors are required to sign and comply with. This includes specific references to complying with all Australian Laws Acts and Regulations, which includes the Modern Slavery Act (Cth) 2018
- Reviewed key supplier Modern Slavery statements and related reports to ensure they maintained compliance and areas of improvement. These included:
 - Haymes Paint [9913280000100802.pdf](#)
 - Dulux [Modern Slavery Statement | DuluxGroup](#)
 - Dell [FY25 Statement Against Modern Slavery Human Trafficking and Child Labor;](#)
 - United Rentals [Statement-on-Modern-Slavery-and-Human-Trafficking-2025-English-01-17-2025.pdf](#)
 - Cargo Wear [Corporate Sustainability in Work Uniforms](#)
- Requested key suppliers to complete modern slavery compliance questionnaires.
- Initiated development of Individual Supplier Profiles for top 5 suppliers, detailing risk categorisation and mitigation strategies.

6. Assessing Effectiveness

Higgins uses the following KPIs:

- Number of training sessions delivered to management: 2
- Number of training sessions delivered to staff: 0

- Whistleblower disclosures: 0
- Grievance mechanism complaints: 0
- Issues identified from internal audits: 0

7. Consultation

This statement was developed in consultation with Higgins' senior management, HR, procurement, and operational teams.

8. Looking Forward

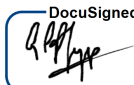
In FY2025–26, Higgins will:

- Expand use of Sedex tools including Radar for benchmarking.
- Continue supplier audits and profile development.
- Enhance staff training on identifying modern slavery indicators.
- Refine procurement processes to embed modern slavery risk assessments.

9. Approval

This statement was approved by the Board of Directors of Higgins Coatings Pty Ltd on **12 December 2025**

Signed:

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Gerard Higgins
Managing Director

Date: 12/12/2025 | 5:23 PM AEDT