

Hacer Modern Slavery Statement

FY23



About this statement

This is a joint Modern Slavery Statement for the financial year ended 30 June 2023 (Statement). This statement is prepared for Hacer Group Pty Ltd (ACN 091 032 530) and the following associated entities are identified as the reporting entities for the purposes of the Act: Hacer Australia Pty Ltd (ACN 650 862 721, ABN 90 650 862 721) Hacer Group Pty Ltd (ACN 091 032 530 as trustee for the Hacer Group Unit Trust, ABN 86 972 049 616) Hacer Group QLD Pty Ltd (ACN 142 880 975, ABN 87 142 880 975) Hacer Group NSW Pty Ltd (ACN 604 377 282, ABN 99 604 733 282) Hacer Group Australia Pty Ltd (ACN 612 663 831, ABN 69 612 663 831) Arc Metal Group Pty Ltd (ACN 615 321 438, ABN 72 615 321 438) Hacer Group WA Pty Ltd (ACN 604 376 632, ABN 48 604 376 632) Hacer Group SA Pty Ltd (ACN 605 304 514, ABN 66 605 304 514) herein references to “Hacer”, “Group”, “us”, “we”, or “our” in this Statement are references to the Hacer Group and each of the reporting entities unless specified otherwise.

Hacer Group’s registered office is located at
222 High Street, Kew, 3101 Victoria.

Consultation

In preparing this Statement, Hacer Group’s General Counsel actively engaged and consulted with the relevant business units and entities which form part of the Group. This was undertaken by (i) collaborating with the relevant business units, entities and boards to provide an overview of the Modern Slavery Act 2018’s reporting requirements, (ii) providing information regarding the actions we intend to take to address these requirements including relevant updates, and (iii) seeking feedback from relevant business units, entities and the board with respect to modern slavery matters. This report is the consolidation of the outputs from those efforts.

We acknowledge the Traditional Owners of Country throughout Australia where we work, and their continuing connection to land, sea and community. We pay our respects to all Aboriginal and Torres Strait Islander peoples, their cultures and to their Elders past, present and emerging.

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At Hacer, we value the social wellbeing of the communities we work in and the people we work with.

Addressing modern slavery in our supply chain remains a priority for our business.

Approximately

49.6

 million people around the world¹

at least

41K

 people in Australia¹

continue to live in slavery-like conditions.

For Hacer, **these numbers are unacceptable** and highlight the need to continue taking meaningful steps towards eliminating slavery practices.

Modern slavery is present in every country and within most industries. While we operate primarily in Australia, where modern slavery is less common, we acknowledge our reliance on supply chains which extend across higher risk geographies and industries. Factors including long and complex supply chains, tight margins and strict timelines, the use of raw materials and high rates of unskilled labour all contribute to a higher risk of modern slavery in the building and construction industry.

In publishing this statement, we recommit to continuously improving our approaches with the goal of contributing to a global economy in which human rights are protected and modern slavery no longer exists.

This Statement was approved by the Hacer Board of Directors on 20 December 2023. The Statement was approved on behalf of the group reporting entities.

¹ Walkfree 2022, Global Slavery Index (Country Study: Modern Slavery in Australia), Walkfree, Australia (Accessed from: <https://www.walkfree.org/global-slavery-index/country-studies/australia/>)



Key Achievements FY23

Management

We established clear roles and responsibilities for Modern Slavery Risk Management.

Due Diligence

We undertook an independent review of our systems and defined areas to improve them.

Capability and Awareness

We extended our baseline awareness training to all employees via our e-Learning module.

Governance

We established a new Contracts Manager role to better support the oversight and management of our subcontracting practices and the associated risks.

Risk

We engaged Edge Impact to undertake a spend-based risk assessment and work with our staff to define our priority risk areas.

Structure, Operations and Supply Chain

1.1 Hacer Overview

Hacer, a privately held construction company, first ‘broke ground’ in Melbourne in 2000, quickly growing into a multi-faceted business by offering clients a fully-integrated end-to-end design and construct service.

Over the past 23 years we’re proud to have completed landmark buildings for some of Australia’s best-known corporations and enterprises, winning multiple awards for building excellence.

With offices in Melbourne and Sydney, Hacer continues to grow a reputable portfolio of work across a diverse range of sectors. With a strong emphasis on quality, we deliver long-standing developments as well as long-standing relationships.

Hacer specialises in the construction and delivery of low, medium and high-rise mixed-use residential, retail, office and commercial developments, shopping centres, hotels, hospitals and medical centres and commercial fit outs.

Additionally, Hacer holds a ‘controlling interest’ over Arc Metal Group Pty Ltd (Arc Metal). Arc Metal specialises in the design, fabrication and fitting of metal architectural products, which are incorporated into a diverse range of construction projects across Australia.

With end-to-end responsibility comes end-to-end accountability and our clients depend on us to construct with reliability.

Company Statistics

2000 Year Established

450m Annual Revenue

70% Repeat Client Work

230+ Team Members

12 Sites Currently Under Construction

1bn+ Works Under Construction

350+ Projects Completed

Employment Status (at 30 June 2023)

Full time

167 Permanent¹ Employees

17 Fixed Term² Employees

42 Day Hire Employees

Part time

8 Permanent¹ Employees

5 Fixed Term² Employees

Nil Casual³ Employees

239 Total Hacer Headcount

Operational Location



¹ Permanent employees are employed by Hacer on a full time (38 hours per week) or part time basis (less than 38 hours per week).

² Fixed term employees are employed by Hacer for a fixed term (their employment has an agreed end date).

³ Casual employees are paid on an hourly basis.

1.2 Supply Chain

Hacer's supply chain is a complex network made up of many stakeholders, materials and activities. Our network provides the labour and material inputs for our construction projects and extends across Australia and overseas. We engage directly with approximately 1,328 subcontractors and suppliers. Similarly, these subcontractors and suppliers engage with, and purchase, thousands of products and services from, their own sub-subcontractors and sub-suppliers which then make up our extended supply chain.

FY23 Procured Goods and Services

\$350.7 Million

Direct Suppliers

1,328

Total Spend by Category and Country

Country ■ Australia ■ China

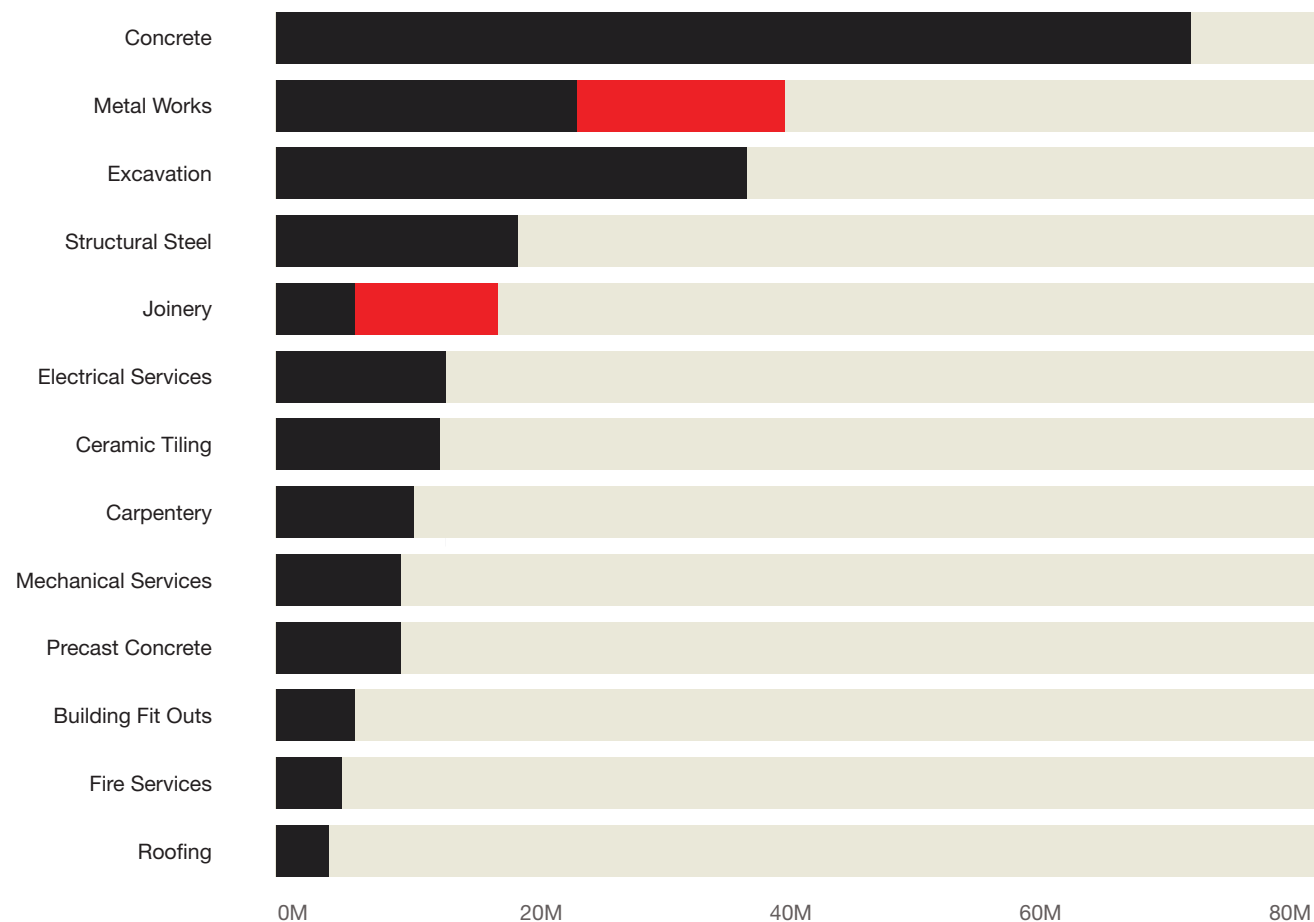


Figure 2 - Hacer Spend by category

Our supply chain can be described in three key segments: Labour, Material Inputs and Corporate Procurement.

Labour

To be successful in delivering our projects we require a diverse set of skills and expertise. As a result, labour is a critical component in our supply chain. For each project, in addition to our employees, we will typically engage professional consultants, engineers, skilled and unskilled labourers and various subcontractors and suppliers. This decentralised model can lead to a complex network of labour relationships.

Maintaining worker protections, including fair wages, safe working conditions, and compliance with labour laws, are critical priorities for Hacer. The fragmented nature of the construction labour market requires us to be vigilant in ensuring clear and consistent practice of these protections across all stakeholders.



Material Inputs

Our projects use a significant amount of construction materials, including (without limitation) concrete, steel and composite materials like joinery and facades. Supply chains for these materials will typically involve numerous suppliers, manufacturers, and distributors. Feasibility and resource pressures often mean that these materials will be sourced from outside of Australia.

While the majority of our tier one materials suppliers are based in Australia, Hacer also procures some construction materials directly from overseas based suppliers and manufacturers. Materials such as joinery and facades make up the majority of imported goods within our supply chain.

Much like labour, our materials supply chain is decentralised and supported by subcontracting. This introduces various challenges in terms of supply chain transparency in relation to component materials.

7%
of total spend comprises products and materials sourced from China directly

Corporate Procurement

Many of the goods and services used to facilitate our day-to-day operations and business functions are acquired through our corporate procurement supply chain.

Corporate procurement includes goods and services to support functions such as professional services, IT and communications, marketing, travel, cleaning, security and insurance.

Efficiency, cost-effectiveness, quality and reliability are key considerations in relation to our corporate procurement. Our corporate supply chain is underpinned by strong relationships, which are regularly evaluated to ensure that the goods and services being acquired are contributing positively to Hacer's overall objectives.

Approach to Risk Management


This section outlines the development in our understanding of modern slavery risks in our supply chain.

In developing our understanding, we have looked at the risks in the property and construction industry at a macro level and have undertaken an assessment to identify risks specific to Hacer. As part of our focus on ‘priority risk areas’ we have also taken further steps to identify where these risks may occur within our supply chain.

2.1 Risks in Property and Construction

The property and construction sector employs

7%

 of the global workforce

and is responsible for approximately

18%

 of modern slavery victims

The ability to monitor and address exploitative practices within the supply chain is often made difficult by the fragmented structure created through use of multiple subcontractors and their respective suppliers. Additionally, the production of construction inputs relies heavily on low-skilled, low-paid, and often migrant workers, who are increasingly vulnerable to exploitation due to circumstances such as lack of legal rights, language barriers, and limited access to information and support. High demand for construction materials and services can drive down prices, which can lead to cost-cutting measures that can result in exploitation, including forced labour.

22%

of these victims² are forced into labour to support the production of essential raw materials.

Lack of transparency within the industry further exacerbates the problem, making it challenging to trace the origins of materials and ensure ethical and sustainable production practices.

Why does Modern Slavery occur?

Complex root causes

Complex root causes including poverty, conflict and crisis, cultural perspectives and lack of protective safeguards and legislation.

Deception & Coercion

Perpetrators using tactics such as intimidation, coercion, manipulation, and deception to entrap individuals.

Vulnerable Migrants

Individuals taking risky decisions in search of opportunities to provide for their families.

Globalisation

Long opaque supply chains, with decreasing levels of transparency.

Purchasing Practices

Unrealistic cost and time pressures on suppliers, including sudden changes in demand.

Shifting Risk

Passing on responsibility – “it’s not our issue, it’s the supplier’s problem”.

Varied Worker Protections

When labour protections are weak, workers are more vulnerable to exploitation and abuse, including forced labour and human trafficking.

Figure 3 - Modern Slavery Root Causes

² Australian Human Rights Commission 2020, Property, Construction and Modern Slavery, Australian Human Rights Commission, Australia



2.2 Risks in our Operations

In FY23, the modern slavery risks in our direct operations remained comparatively low. Our employees operate within Australia, primarily delivering site-based construction and project management services and other office-based services related to construction; and are employed in accordance with Australian workplace law. Our employees have the right to join a union and 20 per cent of our workforce is employed under an Enterprise Bargaining Agreement. We recognise that in some contexts, non-permanent workers and workers who hold visas may be more vulnerable to exploitation. As can be seen in Section 1.1, most of our workforce are permanent employees.

We have a comprehensive suite of policies that contribute to a safe and fair working environment. Our policy framework, outlined in Section 3.3, applies to all employees.

2.3 Supply Chain Risk Assessment

In 2023 Hacer engaged Edge Impact to conduct a Social Life-Cycle Assessment (S-LCA) analysis of our spend data against a number of internationally recognised risk, media and literature databases (including the Social Hotspot Database, Global Slavery Index). This type of analysis ranks procurement categories according to inherent modern slavery risk, and by spend, to summarise the hotspots and their drivers. The aim of conducting an S-LCA, is to cut through the opacity of complex global supply chains to identify and to prioritise our focus on the most salient risks to our people. Our hope is that this approach will assist us to take more targeted actions to mitigate these risks in a manner that is consistent with our commitment to the United Nations Guiding Principles on Business and Human Rights (UNGP).

Our S-LCA helped us to identify those areas within our supply chain at the highest risk of modern slavery. This was done through consideration of both high-risk geographies and industries, and was priority weighted based on our annual spend.

We seek to adopt the principles outlined in the UNGP to assess our modern slavery risks, in alignment with the Australian Government’s recommended approach. We analyse our potential involvement in modern slavery and other human rights violations through three perspectives: as a ‘Cause’, a ‘Contribute’, or ‘Direct Linked’ to the harm. This breakdown enables us to understand and address the various dimensions of our association with human rights risks (and helps us to understand and develop our approach to remediation upon the identification of harm).

Cause

A business may cause modern slavery or other human rights harm where its actions directly result in the occurrence of modern slavery.

Contribute

A business may contribute to modern slavery or other human rights harm where its actions or omissions facilitate or incentivise modern slavery.

Directly Linked

A business may be directly linked to modern slavery through its services, products or operations. This includes situations where modern slavery may occur in a business’ extended supply chain.

The findings from our S-LCA are presented below:

Inherent Risk	No. of Categories	No. of Suppliers
Very High	33	761
High	25	404
Medium	29	344
Low	28	368

Updated Risk Assessment

In FY23, Hacer recognised that we would be most effective prioritising our activities around the categories in relation to which we have the most opportunity for impact. The drivers of modern slavery risks are constantly evolving and we identified a need to establish a comprehensive understanding of our priority areas.

To address this, Hacer engaged Edge Impact to undertake a Social Life Cycle Assessment (S-LCA), a spend-based risk assessment, to provide some insight into those stages in our supply chain which pose the greatest risk to Hacer and to give some greater clarity on our high priority risk areas.

The findings from our S-LCA informed the prioritisation of activities and initiatives to support Hacer in focusing on some more targeted risk controls. We are currently developing a three-year implementation roadmap to support the roll out of these controls.

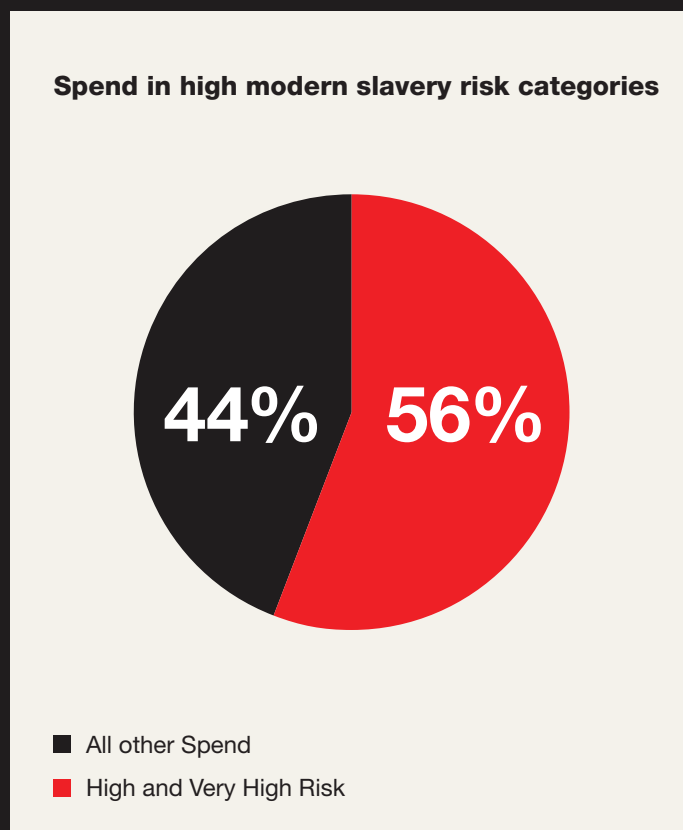


Figure 4- Percentage of spend in high modern slavery risk categories

Categories with high inherent risk

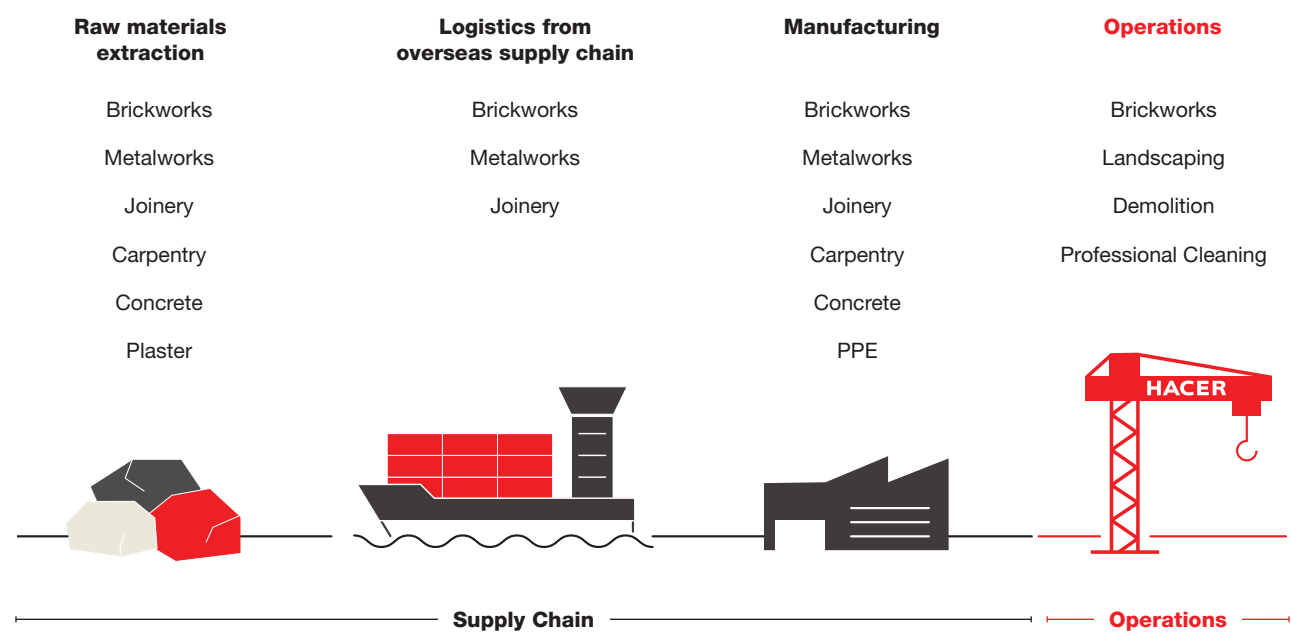


Figure 5- Modern slavery supply chain risk by category

2.4 Prioritisation

Our S-LCA highlights specific aspects of our supply chain where potential human rights implications are most prevalent. However, we have recognised that there is an opportunity for us to have a greater impact across our supply chain, including in lower risk areas. Using our risk assessment outcomes, we worked with Edge Impact to facilitate a series of workshops to explore our existing business practices and any perceived influence over our subcontractors and suppliers, and to identify opportunities for meaningful interventions.

Much of our focus was on areas and categories within our supply chain where our ability to influence change was relatively high. This included a focus on those subcontractors and suppliers with whom our spend was relatively high as well as a better understanding of how ‘close’ the risk was to Hacer within our supply chain. Our team recognised limitations in leverage with smaller subcontractors and suppliers and deeper points within our supply chain.

Through this process, we identified the following priority risk areas for Hacer.

2.5 Priority Risk Areas

Risk Category	Subcontracted Labour	Construction Materials	Construction Materials	Corporate Procurement
		(Indirect – Via local subcontractors and suppliers)	(Direct – Via overseas suppliers and manufacturers)	
Key Risk Factors	Limited labour market promotes a reliance on temporary or migrant workers	Complex and opaque supply chains	Reliance on lower skilled labour	Use of third-party recruitment
	Increased vulnerability to exploitation and modern slavery.	Difficulty in tracing the origin of materials minimises the ability to identify and manage modern slavery risk.	Increased risk of exploitation in the manufacturing process.	Potential for exploitation in recruitment processes.
			Links to high-risk geographies	Complex supply chains
			Geographical locations with higher prevalence of modern slavery.	Difficulty in monitoring and ensuring ethical practices throughout the supply chain.
Our Relationship to Risk	Directly linked/ Contribute	Directly linked	Directly linked/ Contribute	Directly linked/ Contribute
	Failure to adequately monitor subcontractors may contribute to exploitation risks, directly contributing to modern slavery. Regular audits and engagement are crucial to mitigate this risk.	We have limited control over local subcontractors and suppliers but are committed to transparency and due diligence to address the indirect risks associated with complex supply chains.	Our sourcing practices are directly linked with the risk of modern slavery. Prioritising ethical sourcing and conducting due diligence are crucial risk mitigants.	Unethical procurement practices directly contribute to modern slavery risks. Implementing transparent procurement processes and engaging with suppliers are essential.

Table 1 - Hacer Priority Risk Areas

Addressing and Mitigating Risks

At Hacer, we are working towards integrating modern slavery risk management into our existing approaches.

It's not just a policy; it's how we do business.

3.1 Governance

Every member of Hacer has a role to play in addressing modern slavery. We believe in shared responsibility and clear accountability, because real change happens when everyone is on board.



Table 2 – Modern Slavery Governance Framework

Case Study

Governance Mapping

We believe modern slavery risk management is a shared responsibility, so we have worked with Edge Impact to map modern slavery roles and responsibilities against our existing functional roles, by business unit.

This framework aims to provide better clarity to our employees, which will inform the development of future policies and training programs.

Creation of the Contracts Manager Role

In FY23 we introduced a new ‘Contracts Manager’ role within Hacer to increase oversight in procurement and subcontractor and supplier award recommendations. This role will enhance modern slavery risk management and the integration of relevant risk management initiatives across Hacer.

3.2 Policies

Our policies and how they support our approach to modern slavery.

Recruitment Policy

Outlines processes to ensure that the recruitment of employees is conducted ethically.

Code of Conduct

Sets minimum standards of behaviour and conduct, ensuring that employees are aware of and commit to ethical practices.

Subcontractor Agreement

Embeds contractual obligations related to modern slavery prevention, to ensure subcontractors comply with modern slavery legislation and take appropriate measures to reduce the risk of modern slavery within their respective supply chains.

Modern Slavery Policy

Establishes a clear commitment to understanding and reducing the risk of modern slavery within our supply chain, outlining Hacer’s expectations in relation to compliance with all laws relating to modern slavery.

Grievance Policy

Establishes a mechanism for individuals, including employees, independent contractors, volunteers and visitors entering a Hacer worksite, to raise concerns, ensuring that grievances are addressed promptly and effectively.

Procedure for Purchasing

Guides the purchasing process to assess and mitigate risks associated with suppliers and contractors, ensuring that procurement decisions consistently align with Hacer’s commitments to non-price attributes (including social risk).

Whistleblower Policy

Encourages a mechanism for individuals, employees, independent contractors, volunteers and visitors entering a Hacer worksite, to report any suspected wrongdoing, misconduct or unethical behaviour within Hacer, providing protection for whistleblowers and fostering a culture of transparency and accountability.

3.3 Due Diligence Process

At Hacer, we are working towards improving our human rights due diligence process. In FY23, Hacer has continued to roll out the implementation of Informed 365, a key tool involved in the real-time collation of Modern Slavery related data and metrics.

The use of Informed 365 allows Hacer to track the proportion of subcontractors and suppliers that have taken steps towards mitigating modern slavery risk within their respective supply chains. Subcontractors and suppliers can provide Hacer with their related modern slavery documentation including:

- Policies
- Code of conduct
- Due diligence processes
- Risk data
- Other relevant efforts.

In subsequent years, we are looking to develop a due diligence framework, where we will:

- 1 Plan and understand risk:** Based on the risk assessment we have conducted of Hacer’s supply chain and our categorisation of High/Medium/Low risk subcontractors and suppliers.
- 2 Prioritise suppliers and categories:** Risk level will determine the due diligence approach and documentation required.
- 3 Manage due diligence efforts:** Set KPIs and monitor progress.

3.4 Capability and Awareness



Training

Baseline Awareness Training

Overview: Defines modern slavery, its relevance to the construction industry, risks related to our supply chain and the approach Hacer takes to mitigate these risks; online training module.

Audience: Compulsory for all staff

Mandatory Employee Modern Slavery Awareness e-learning

All Hacer employees are required to complete a bespoke, modern slavery e-learning module to help facilitate proactive action and positive change towards modern slavery.

The module identifies various modern slavery risk indicators using practical examples relevant to products and services across the construction industry. The practical examples demonstrate how Hacer might cause, contribute, or be directly linked to modern slavery through our supply chain.

In addition, the module articulates Hacer’s governance arrangements, including our escalation and reporting channels for suspected modern slavery breaches so that incidents, once identified, can be directed to the appropriate person(s) within the business.

Table 4 - Hacer Modern Slavery Training Framework

3.5 Partnerships



Better Sydney (Advisors, expertise)

Better Sydney provides trusted professional advice to Hacer in relation to our modern slavery strategy and has also co-facilitated modern slavery training sessions.

INFORMED 365

Informed 365 (Technology providers)

Informed 365 provides a customised, cloud-based application, which Hacer uses to manage, monitor and engage with our supply chain. Informed 365 will be developing educational training resources, which Hacer intends to extend to our subcontractors and suppliers.



Edge Impact (Advisors, expertise)

Edge Impact provides trusted professional advice to Hacer in relation to our modern slavery strategy. Edge Impact has performed our Social Life-Cycle Assessment (S-LCA) risk assessment, has undertaken a review of our due diligence tools and systems, has hosted several workshops with our employees and has assisted in the drafting of this modern slavery statement.



Property Council of Australia (Industry peers, knowledge sharing)

Property Modern Slavery Working Group through Informed 365 provides industry specific guidance and resources that inform our risk management approaches.

3.6 Grievance Systems

Hacer upholds high standards of conduct and aims to create a culture that welcomes feedback from all stakeholders including affected parties to ensure we are operating in alignment with our goals and policies across our supply chain. We recognise that giving feedback isn't always straightforward, so we have created easy to access systems which allow individuals to readily and provide feedback or highlight concerns about modern slavery, potential human rights issues, or unethical behaviour.

Hacer has two key pathways for raising a grievance; both have defined policies to support the person raising the grievance including;

- Maintaining anonymity, if they choose;
- Being treated fairly and with respect as their claim is heard and understood;
- Accessing remedy for identified harm; and
- Being protected from reprisal for raising a concern.

Mechanism

Grievance System

Purpose, audience and access: Allows all internal employees, on-hire employees, independent contractors, volunteers, or visitors entering a Hacer worksite to have concerns heard and addressed in-house, in a timely and confidential manner. This approach minimises the need for employees to go outside of Hacer for assistance. Feedback provided through this system is provided directly to our HR Manager, or to the immediate supervisor of the relevant employee.

Mechanism

Whistleblower System

Purpose, audience and access: Allows any employee, officer, their relatives and dependants, suppliers of goods or services to Hacer and their employees and workers) to confidentially report genuine concerns about wrongdoing, misconduct or unethical behaviour, including as they relate to potential exploitative practices on our worksites or in our supply chains, without fear of reprisals. This system can be accessed by Hacer employees via an anonymous feedback link in our internal portal. Other stakeholders can direct their concerns through Hacer's website or directly to the relevant whistleblowing officer.

3.7 Remediation Process

If, through investigating a grievance, Hacer determines that we have caused or contributed to modern slavery or slavery like conduct, we acknowledge our responsibility and take proactive steps to remediate the issue and address the impact.

Our Modern Slavery Working Group has developed a 'remediation framework', which has been incorporated into Hacer's general remediation processes. We understand that in order to be effective, a grievance process must be "trusted and confidential". This was a primary consideration when updating our general remediation processes.

The key purpose of our remediation plan is to ensure that any victim of modern slavery is protected, and to provide some guidance to Hacer in relation to the most appropriate pathway in supporting a victim to return to their personal circumstances prior to modern slavery. Our remediation framework is based on the following principles:

- Victim centred
- Context specific
- Transparent
- Accessible
- Responsible
- Collaborative
- Action focused

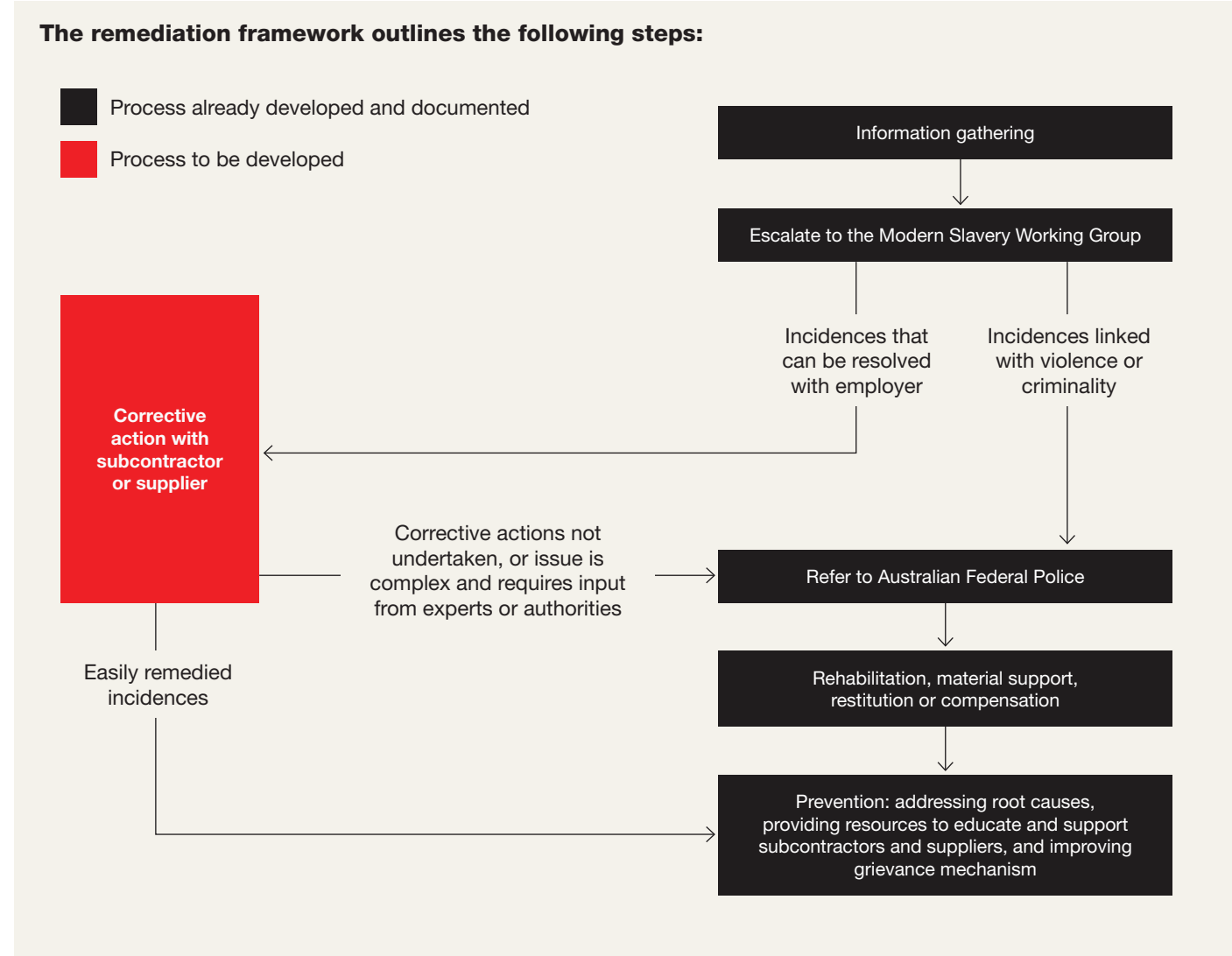


Figure 6 - Hacer's Remediation Process



The Modern Slavery Working Group members have been deemed the 'first responders' for modern slavery related grievances. The Group's response and implementation of the remediation framework will depend on the specific circumstances and Hacer's causal link to the adverse impact, which will be considered in alignment with the UNGP.

Where Hacer determines a modern slavery breach has occurred, we will contact the Australian Federal Police. We will then look to action appropriate measures to prevent such a breach occurring in the future.

Hacer's response will depend on the circumstances of the individual case, but may include any of the following:

- Information gathering to understand the full scope of the modern slavery risk;
- Taking steps to ensure the harm caused by modern slavery is mitigated and will not occur again;
- Communicating the modern slavery risk to appropriate authorities;
- Stopping activities that cause or contribute to modern slavery, including taking action under its subcontractor and supply arrangements;
- Issuing companywide alerts and updating subcontractor and supplier registers serving to notify all business units that a systemic modern slavery issue with a subcontractor or supplier has been identified; and
- Providing resources to educate and support subcontractors and suppliers to ensure harm does not reoccur.

Measuring effectiveness



Hacer is committed to long term action.

Our commitment to long term action requires us to regularly track and report on our actions and progress. In doing so we are better able to understand the effectiveness of our interventions and identify any gaps or areas for improvement.

4.1 Last year's commitments and performance

Area	Commitment	Progress
Governance	Modern Slavery Committee: Ensure internal Committee meetings continue to be held regularly, minutes are taken and action items updated.	We have developed the terms of reference for this committee and have increased the participants to become a broader Modern Slavery Working Group, but we have not yet established a routine cadence for these meetings.
	Creation of the new Contracts Manager role.	The new role of Contracts Manager has been created to enhance oversight. Contracts Managers are now actively involved across all of our projects.
	Policies and Processes	Modern Slavery Policy: Make the Modern Slavery Policy available to all employees including during the induction of new employees and through publishing on the internal portal.
	Training and Education: Arrange a further company-wide training session, focusing on modern slavery risks specific to our industry/business. Distribute module to all new staff members.	We have extended our baseline awareness training to all employees via our e-learning module. Targeted training for key roles is still in development.
	Strengthening Contracts: Continue to screen documents to ensure modern slavery clauses are included in all relevant contracts. Periodically review clauses to ensure any developments in the law are appropriately reflected.	Ongoing screening of documents to ensure inclusion of modern slavery clauses in relevant contracts. Regular review of clauses to align with legal developments.
	Risk Assessment: Continue monitoring the risk assessment/risk rating tools available on the Informed 365 platform as we focus on getting more subcontractors/suppliers to respond.	Ongoing monitoring and risk assessment. We are also currently reviewing our use of the Informed 365 platform with a view to embedding it into our subcontractor and supplier due diligence processes.
Supplier Engagement	Modern Slavery Declaration: Continue engaging suppliers to provide data during the Investigation Stage via Informed 365.	We are currently reviewing our use of the Informed 365 platform with a view to embed it into our supplier due diligence processes.
	Education for Subcontractors/Suppliers: Utilise the training and education programs embedded within Informed 365 platform to educate subcontractors/suppliers.	We engaged Edge Impact to assist in identifying our priority risk areas. The communication plan to support this is still in development.
Remediation	Remediation Framework: Ensure all staff are aware of how to access and utilise the modern slavery risk remediation framework. Run a trial to ensure there are no gaps in the framework.	Our review has identified the need to tailor it further to meet the needs of vulnerable whistleblowers. We did not progress to a trial of our systems.

Table 7 - Update on last year's commitments

Next Steps

5.1 Future Commitments

Area	Governance	Risk Management	Risk Management	Capability and Awareness	Grievance and Remediation	Collaboration
Commitment	<p>Create a 3 year modern slavery roadmap.</p> <p>Integrate modern slavery risk management into the Sustainability Framework and Action Plan.</p>	<p>Commence supply chain mapping in one key priority risk category.</p> <p>Formalise a due diligence and risk assessment process.</p> <p>Undergo a prioritisation activity to identify and articulate Hacer's salient modern slavery/human rights risks and priorities. Create an action plan for subcontractors and suppliers under these categories.</p>	<p>Continue to refine and develop our Modern Slavery Working Group, consisting of employees across multiple teams.</p> <p>Continue to implement the modern slavery awareness training module as part of the new employee induction.</p> <p>Educate and equip commercial and design team members with a communication and action plan to communicate modern slavery risks to subcontractors and suppliers.</p>	<p>Provide Board and executive level training in relation to modern slavery (including explanations of Hacer's approach).</p> <p>Publish the modern slavery guide for subcontractors and suppliers: A guide that provides subcontractors and suppliers with clear guidance on Hacer's expectations regarding modern slavery, outlining the steps they should take to better understand modern slavery risks and to reduce the risk of modern slavery within their own supply chain.</p>	<p>Investigate opportunities to extend grievance accessibility.</p> <p>Continue the roll out and encourage use of the remediation framework. Run a trial to ensure there are no gaps in the framework.</p>	<p>Consider opportunities to work with industry bodies to build subcontractor and supplier leverage in the medium term.</p>
Success Criteria	<p>Hacer considers social and human rights impacts as part of its overall commitment to sustainability.</p>	<p>Supply chain mapping of tier one subcontractors and suppliers is complete.</p> <p>Provide a list of high-risk sourcing regions and product categories.</p> <p>Disclose due diligence methodology and process.</p>	<p>All new employees have undertaken the modern slavery awareness training module.</p> <p>Design and commercial team members feel equipped to start engaging with subcontractors and suppliers in relation to modern slavery risks.</p>	<p>Subcontractors receive clear instructions and are educated on next steps to reduce modern slavery risk within supply chains.</p>	<p>Grievance and remediation framework has been trialled, with employees clear on its use.</p>	<p>Identified opportunities for collaboration with other industry bodies in the medium term.</p>

Table 8 - Our future roadmap



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@hacergroup

This Statement was approved by the Hacer Group Board of Directors on 20 December 2023.
The Statement was approved on behalf of the joined reporting entities.

Paul Toleman
Director

Mark Lewis
Director

Vin Sammartino
Director