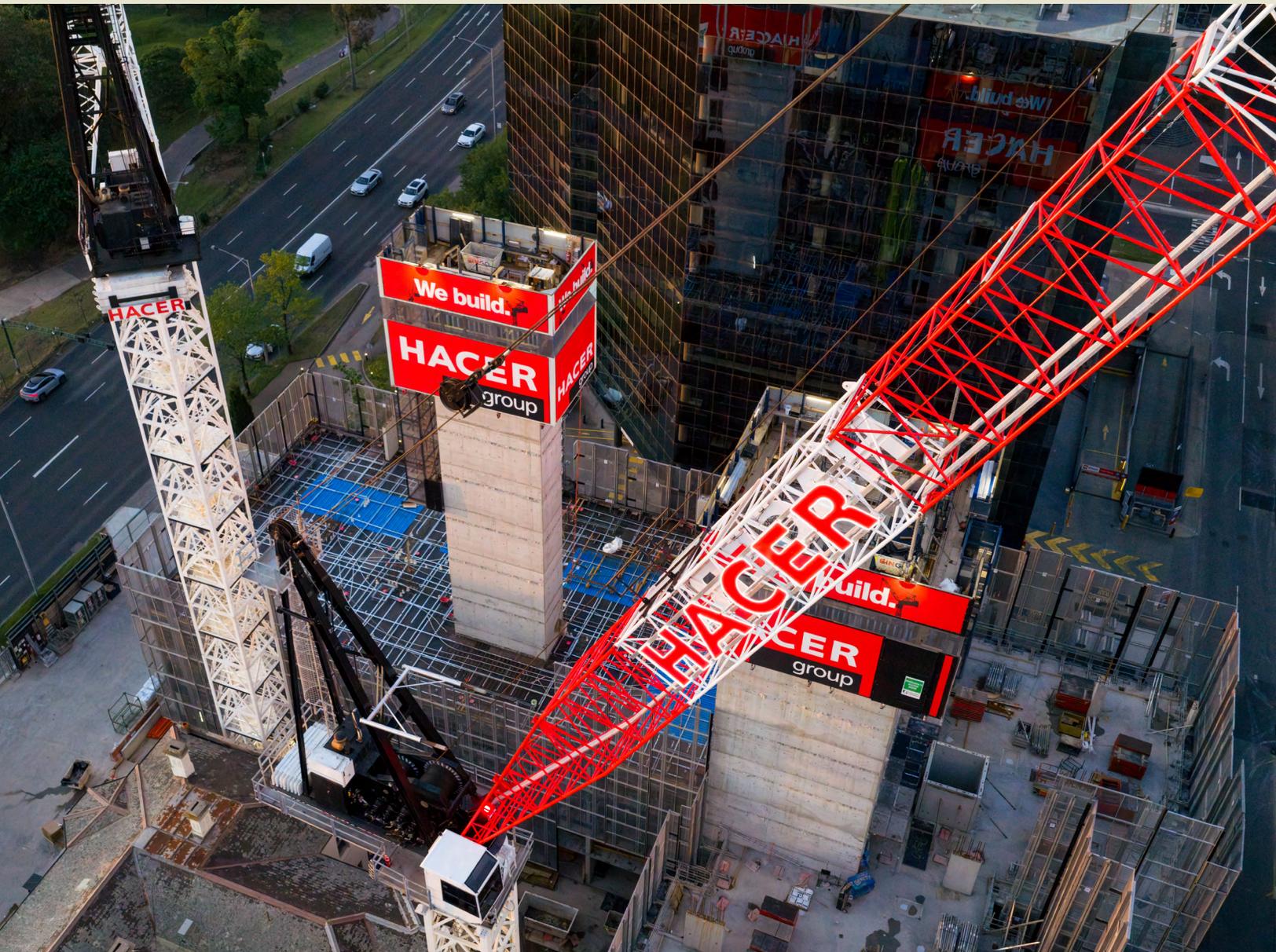


Hacer Modern Slavery Statement

FY25



About this statement

This is a joint Modern Slavery Statement for the financial year ended 30 June 2025 (“Statement”). This statement is prepared for Hacer Australia Pty Ltd (ACN 650 862 721, ABN 90 650 862 721) 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); ACN 091 032 530 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 Admin 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.

Consultation

In preparing this Statement, Hacer Group’s General Counsel and Sustainability Manager 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 Custodians of the Lands upon which we build.

We pay our respects to all Aboriginal and Torres Strait Islander Peoples across Australia, their Elders, past and present, and celebrate their continuing connection to Country – land, water and sky.

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Hacer recognises that our operations can have direct and indirect impacts on both people and the environment, and that we have a responsibility to respect human rights and to avoid causing or contributing to modern slavery.

Upholding this responsibility means collaborating with stakeholders across our value chain.

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 and slavery-like practices.

We are guided in this work by the Universal Declaration on Human Rights, the ILO Fundamental Conventions, and the UN Guiding Principles on Business and Human Rights.

Modern slavery is present in every country and within most industries. While our operations are based in Australia, where modern slavery is less common, we acknowledge our reliance on international supply chains, which extend across higher-risk geographies and industries. 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 heightened risk of modern slavery in the building and construction industry.

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

This Statement was prepared in accordance with the criteria set out in the Modern Slavery Act 2018 (Cth) and was approved by Hacer's Board of Directors on 2 December 2025 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/>)

The table below identifies where each criterion of the Act is addressed in this statement.

Modern Slavery Act 2018 (Cth) Reporting Criteria		Reference in this Statement	Pages
Criterion 1	Identify the reporting entity and any entities the reporting entity owns or controls	About this Statement	02
Criterion 2	Describe the reporting entity's structure, operations and supply chains	Section 1: Structure, Operations and Supply Chain	10
Criterion 3	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 2: Our Risk Profile	14
Criterion 4	Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Section 3: Our Approach to Risk Management 3.1.1 Governance 3.1.2. Due Diligence 3.1.3. Grievance Mechanisms and Remedy	18
Criterion 5	Describe how the reporting entity assesses the effectiveness of these actions	3.1.4.1 Measuring and Monitoring Effectiveness	36
Criterion 6	Describe the process of consultation with any entities the reporting entity owns or controls	Consultations	2
Criterion 7	Any other relevant information		

Key Achievements

FY25



Due Diligence

Implemented a systemic approach to reviewing and engaging with suppliers



Grievance and Remedy

Partnered with Rely and launched our Speak Up! Policies and anonymous grievance reporting mechanism



Enablers

Introduced a number of KPIs to measure and monitor our performance

Structure, Operations and Supply Chain

1.1 Hacer Overview

Hacer, a privately held construction company based in Melbourne, was established in 2000 and became one of the first to pioneer a fully integrated design and construct model in the retail sector.

Today, Hacer delivers projects primarily across Victoria, with a portfolio of work which spans residential and mixed-use developments, as well as commercial, retail, health, industrial, retirement living and student accommodation projects.

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

750m Annual Revenue

70% Repeat Client Work

220 Team Members

11 Sites Currently Under Construction

\$1b Works Under Construction

440 Projects Completed

Employment Status (at 30 June 2025)

Full time

153 Permanent² Employees

11 Fixed Term³ Employees

43 Day Hire Employees

Part time

4 Permanent Employees

7 Fixed Term Employees

2 Casual⁴ Employees

220 Total Hacer Headcount

Operational Location



² Permanent employees are employed by Hacer on a full time (38 hours per week) or part time basis (less than 38 hours per week)

³ Fixed term employees are employed by Hacer for a fixed term (their employment has an agreed end date)

⁴ Casual employees are paid on an hourly basis

1.2 Supply Chain

Hacer's supply chain is a substantial network that provides products, services, labour and material inputs required for our day-to-day operations and construction projects. Our supply chain extends across Australia and overseas.

We engage directly with approximately 1,300⁶ subcontractors and suppliers (collectively referred to as "Suppliers" in this Statement). These Suppliers, in turn, engage with and purchase thousands of products and services from their own sub-suppliers, which together form our extended supply chain.

FY25 Procured Goods and Services

\$612 Million

Direct Suppliers

1,300

Total Spend by Category and Country

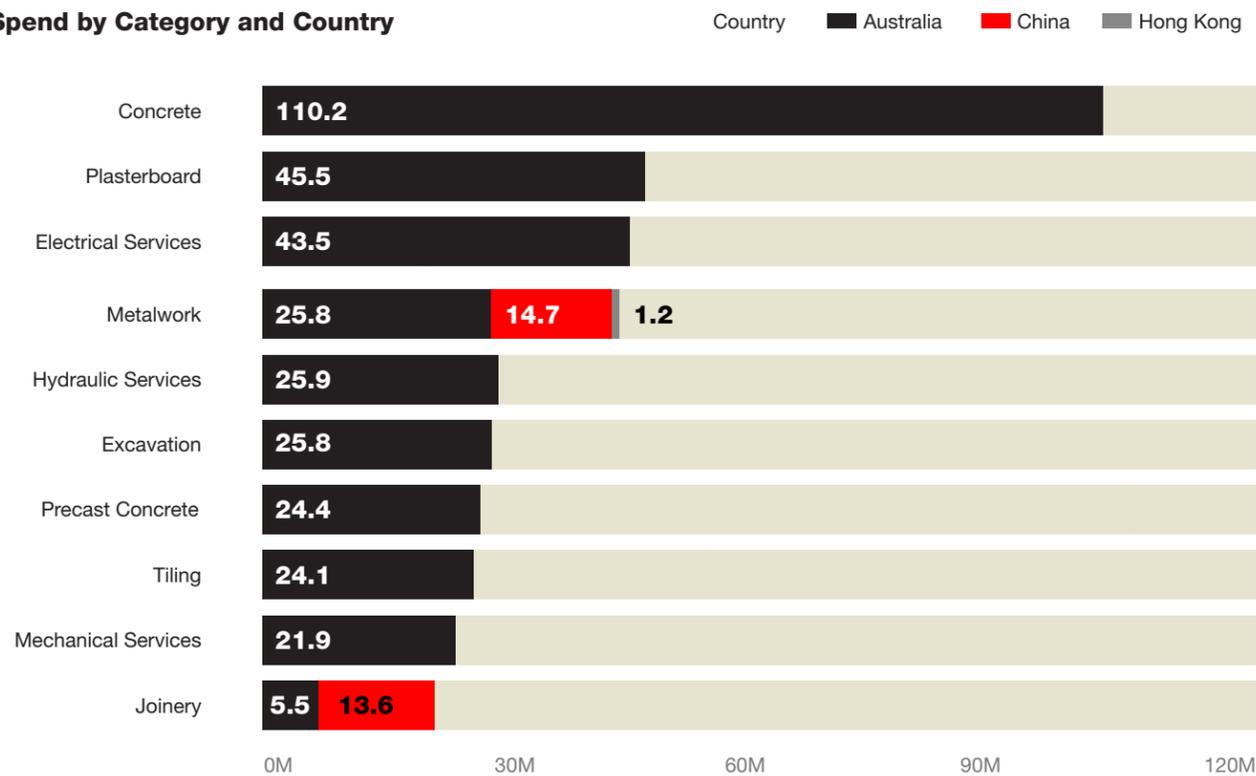


Figure 1 - Hacer spend by category

Note: Country spend includes both the country where the tier one supplier is registered, and tier two country of supply was known.

⁶This excludes approximately 180 vendors (suppliers) at a total of \$38 million (approx. 12% of vendors, and 6% spend), with approximately 80% of spend in the following two categories: Financial and Insurance Services (e.g. Banks, Insurance providers) and Government fees (e.g. Permits, Tax)

Our Supply chain has three key segments: Labour, Materials and Corporate Procurement

Labour

To be successful in delivering our projects we require a diverse set of skills and expertise. Labour is therefore a critical component in our supply chain. For each project, in addition to our employees, we typically engage professional consultants, engineers, skilled and unskilled labourers and various 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 ongoing vigilance to ensure these protections are applied consistently across all stakeholders.

Materials

Our projects use a significant amount of construction materials, including concrete, steel and composite materials like joinery and facades. These supply chains typically involve numerous suppliers, manufacturers, distributors, and installers. Project feasibility and resourcing pressures often mean that several materials will be sourced from outside of Australia.

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

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

7%

of total spend comprises products and materials sourced directly from China



Corporate

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 that support functions such as professional services, information technology and communications, marketing, travel, cleaning, security and insurance.

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

Our Risk Profile

Our understanding of modern slavery risks in our operations and supply chain has evolved over several years.

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

Monitoring and addressing exploitative practices within construction supply chains is often challenging due to the fragmented structure created through use of multiple suppliers and their sub-suppliers. The production of construction inputs relies heavily on low-skilled, low-paid, and often migrant workers, who are increasingly vulnerable to exploitation due to lack of legal rights, language barriers, and limited access to information and support. High demand for construction materials and services can also drive down prices, leading to cost-cutting measures that can result in exploitation, including forced labour.

22%

of these victims⁶ are forced into labour to support the production of essential raw materials.

Lack of transparency within the industry further exacerbates these risks, 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 and 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 2 - Modern Slavery Root Causes

⁶Australian Human Rights Commission 2020, Property, Construction and Modern Slavery, Australian Human Rights Commission, Australia



2.2 Risks in our Operations

In FY25, the modern slavery risks in our direct operations remained comparatively low. However, we recognise that no operation is entirely free from modern slavery risk and we continue to monitor these risks.

Our operations are located exclusively within Australia, where all employees are engaged in accordance with Australian workplace laws. Our workforce primarily delivers site-based construction, project management services and office-based services related to construction.

Our employees have the right to join a union and 18% of our workforce is covered by an award or is employed under an Enterprise Bargaining Agreement. We recognise that non-permanent workers and visa holders may be more vulnerable to exploitation in some contexts. As outlined in section 1.1, most of our direct 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 3.1.1.2, applies to all employees.

2.3 Risks in our Supply Chain

In FY23, Hacer engaged Edge Impact to conduct a Social Life-Cycle Assessment (S-LCA) of our spend data against internationally recognised risk, media and literature databases (including the Social Hotspot Database and the Global Slavery Index). This analysis ranked procurement categories according to inherent modern slavery risk and spend helping to identify risk hotspots and their drivers. The aim of the S-LCA, was to provide greater visibility across complex global supply chains to support the prioritisation of the most salient risks to people in our operations and supply chain.

The S-LCA helped us identify the areas at the highest risk of modern slavery by considering both high-risk geographies and industries, weighted against our annual spend.

Our focus continues to be on the priority risk areas identified in the S-LCA, with new suppliers reviewed, categorised and prioritised accordingly.

Risk Category			
Subcontracted Labour	Construction Materials <small>(Indirect – via local subcontractors and suppliers).</small>	Construction Materials <small>(Direct – via overseas suppliers and manufacturers).</small>	Corporate Procurement
Key Risk Factors			
Limited labour market promotes a reliance on temporary or migrant workers <small>Increased vulnerability to exploitation and modern slavery.</small>	Complex and opaque supply chains <small>Difficulty in tracing the origin of materials minimises the ability to identify and manage modern slavery risk.</small>	Reliance on lower skilled labour <small>Increased risk of exploitation in the manufacturing process.</small>	Use of third-party recruitment <small>Potential for exploitation in recruitment processes.</small>
		Links to high-risk geographies <small>Geographical locations with higher prevalence of modern slavery.</small>	Complex supply chains <small>Difficulty in monitoring and ensuring ethical practices throughout the supply chain.</small>
Modern Slavery Risk			
Migrant Labour Underpayment	Forced Labour Child Labour Migrant Labour Underpayment	Forced Labour Child Labour Migrant Labour Underpayment	Forced Labour Child Labour Migrant Labour Underpayment
Lifecycle Stage			
Operations	Raw Material Extraction Manufacturing	Raw Material Extraction Manufacturing	Manufacturing Operations
Our Relationship to Risk			
Directly linked/ Contribute <small>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.</small>	Directly linked <small>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.</small>	Directly linked/ Contribute <small>Our sourcing practices are directly linked with the risk of modern slavery. Prioritising ethical sourcing and conducting due diligence are crucial risk mitigants.</small>	Directly linked/ Contribute <small>Unethical procurement practices directly contribute to modern slavery risks. Implementing transparent procurement processes and engaging with suppliers are essential.</small>

Table 1 - Findings Priority Risk Areas

Our Approach to Risk Management

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

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

3.1 Responsible Procurement and Supply Chain Framework

To embed modern slavery risk management into our day-to-day operations, we have developed our Responsible Procurement and Supply Chain Framework.



Figure 3 – Hacer's Responsible Procurement and Supply Chain Framework

3.1.1. 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.

3.1.1.1 Governance Framework

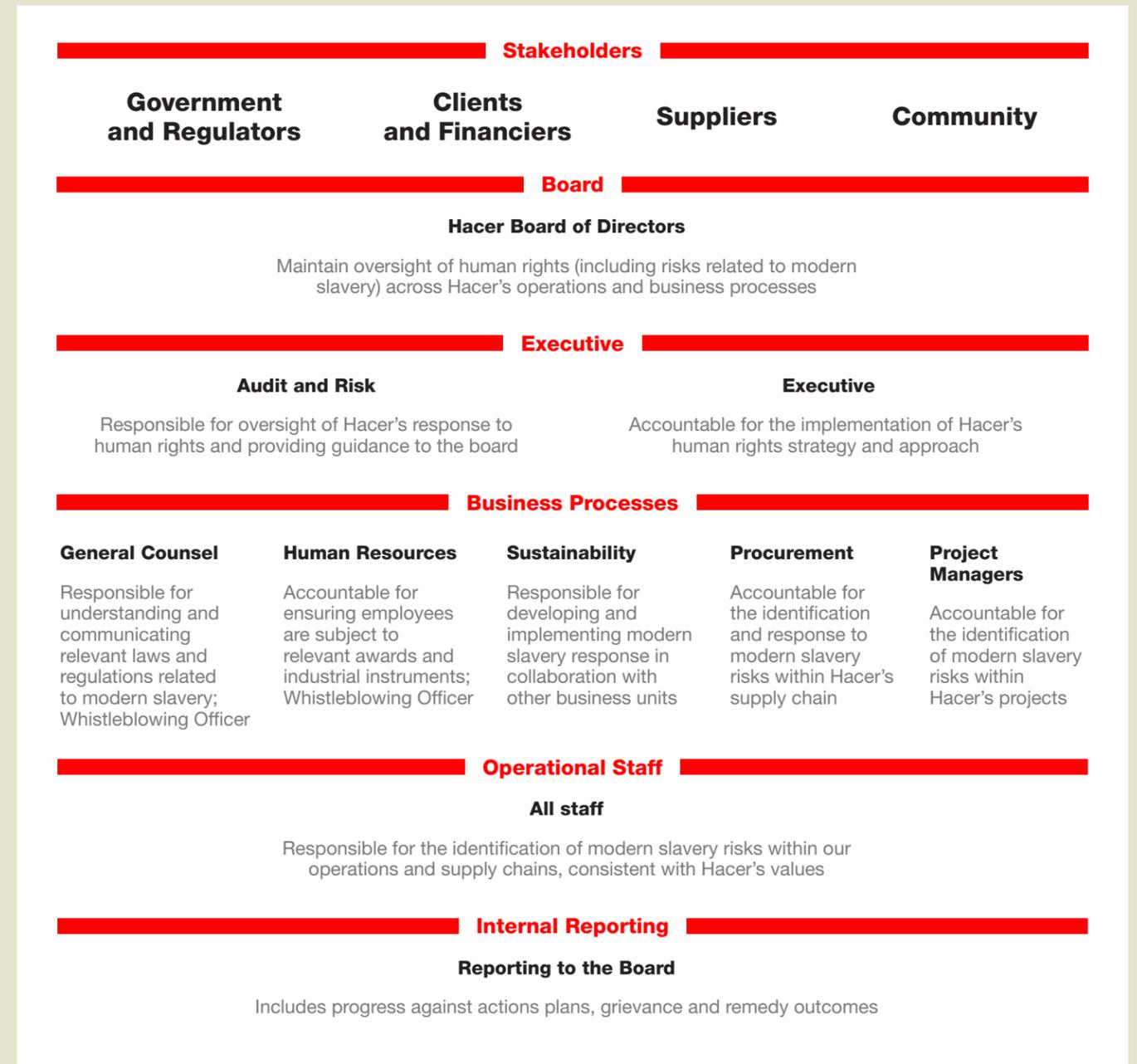


Table 2 – Modern Slavery Governance Framework



3.1.1.2 Policies

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

Hacer Code of Conduct

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

Hacer Modern Slavery Policy

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

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).

Speak Up! Policies

The Speak Up! Policies include the Personal Grievance Policy, the Modern Slavery Policy and the Whistleblower Policy. The policies explain how individuals can submit anonymous grievances via the Rely integrity and employee relations case management platform (Rely).

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.

Supplier 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 operations and supply chains.

Other Supporting Policies

Safety Policy, Anti-discrimination and Equal Employment Opportunity Policy, Workplace Diversity Policy, Harassment and Bullying Policy, Personal Grievance Policy, Recruitment Policy.

Our policies are communicated to both employees and subcontractors at induction. The policies are also available on our company intranet for our employees and are accessible in hard copy by subcontractors at project offices.

Policies are reviewed at least every three years or when material changes to our business or legislation occur.

3.1.2 Due Diligence

Due diligence is the ongoing risk management process to prevent, identify, mitigate, address and account for actual or potential negative impacts in our operations and supply chains.

Below is the due diligence process we have implemented to manage modern slavery risk in our supply chain.

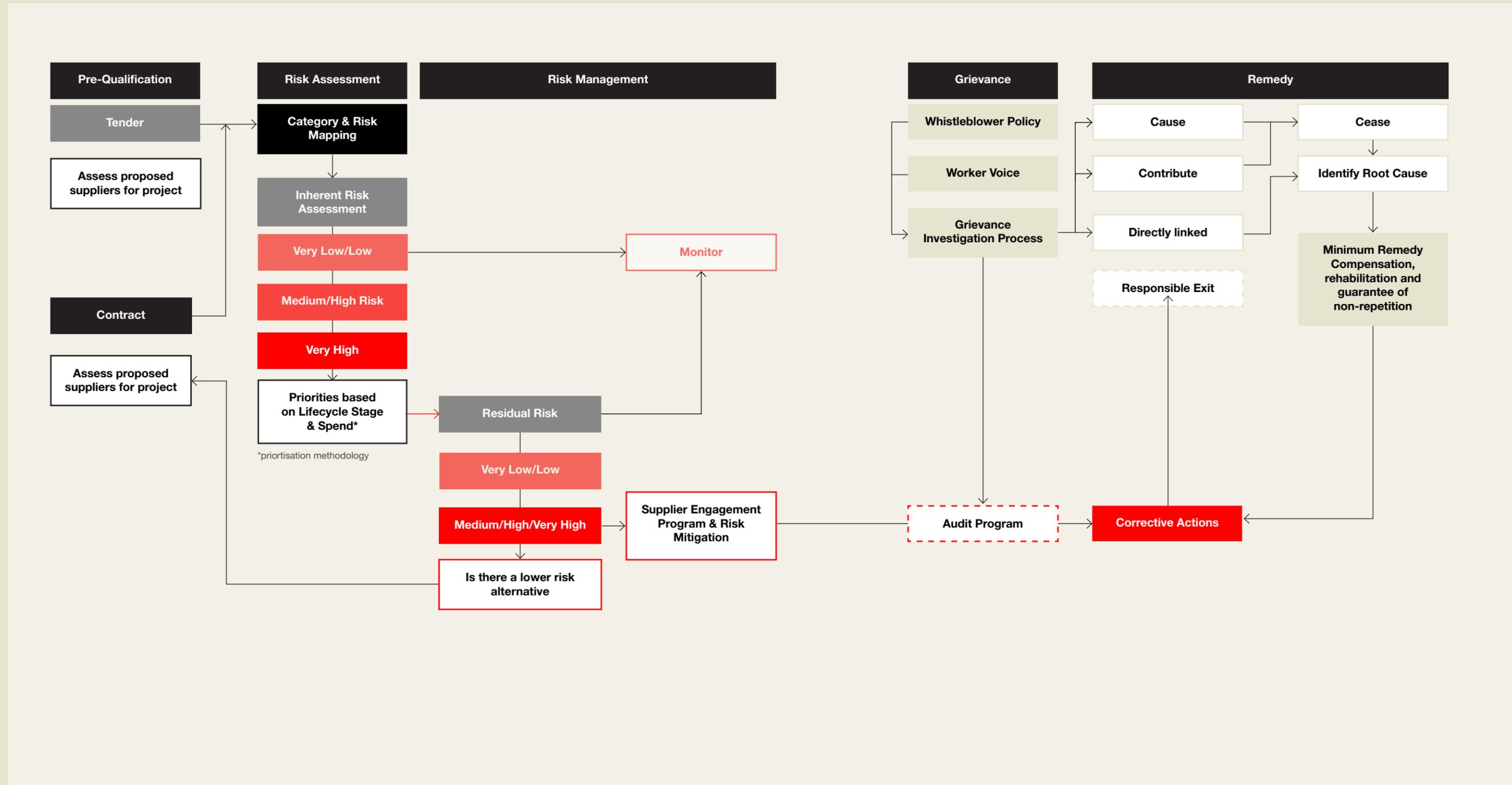


Figure 4 - Hacer's Due Diligence Process

3.1.2.1 Prioritisation Framework

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 greater clarity on our high priority risk areas.

While the S-LCA has helped us focus our efforts in managing modern slavery risks within our supply chain, this still leaves us with a significant number of suppliers to be further assessed and their risks verified.

As such, we have developed a prioritisation methodology that focuses on where in the lifecycle of a product or service the risk of modern slavery lies, and where we have the greatest leverage.

Suppliers are classified based on priority, lifecycle stage and spend:

- **Priority 1:** Operations (>\$1M, \$100K-\$1M, <\$100K)
- **Priority 2:** Operations, Manufacturing and Raw Materials (>\$1M, \$100K-\$1M, <\$100K)
- **Priority 3:** Manufacturing and Raw Materials (>\$1M, \$100K-\$1M, <\$100K)

This approach also allows us to utilise our leverage and our suppliers' leverage to affect change further into the supply chain.

Low level of leverage



High level of leverage

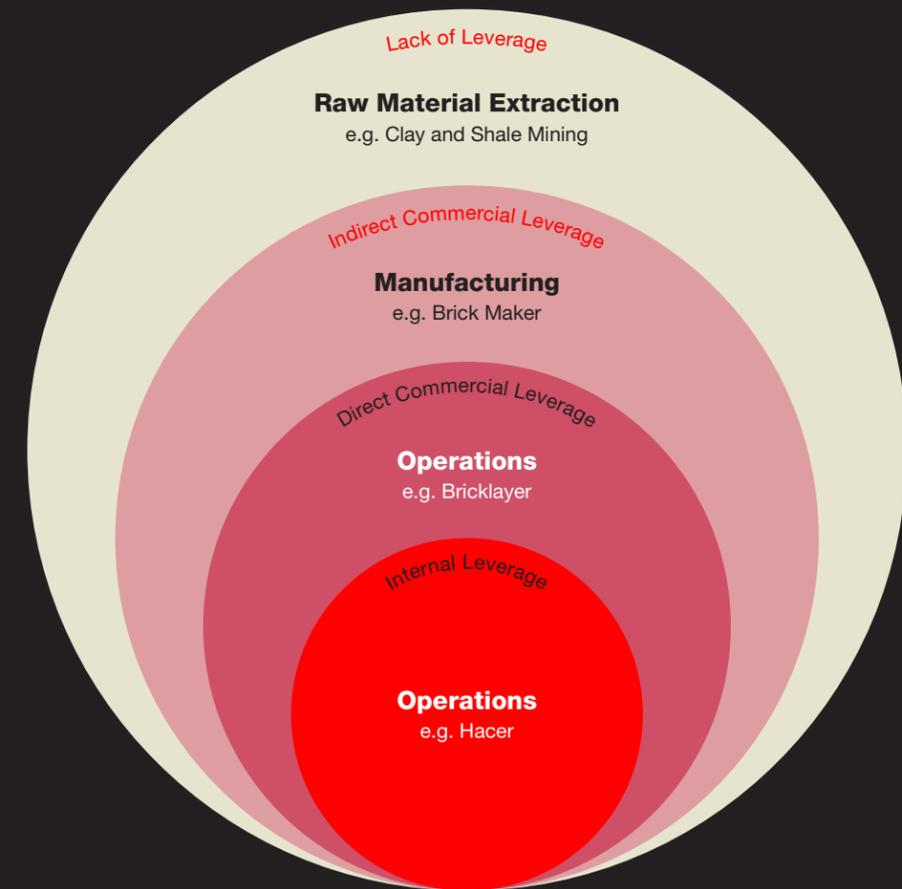


Figure 5 – Supplier Prioritisation Methodology

3.1.2.2 Supplier Engagement

In addition to the S-LCA analysis described in Section 3.1.2.1 above, we use the Property Industry Informed365 (I365) platform, which allows us to understand and track the steps taken by our direct suppliers in addressing modern slavery risks within their own supply chains.



Supplier inherent risk is assessed and reviewed each quarter, with priority suppliers (approximately 50 per quarter) invited to join the I365 platform and complete the Supplier Assessment Questionnaire (SAQ).

Additionally, each year we look to undertake a deep dive into the supply of the highest risk materials used in our projects.

The SAQ results help us assess residual supplier risk and begin mapping our supply chain beyond tier one. Where the SAQ results indicate that a supplier has ongoing (residual) high risk, the SAQ responses are reviewed for hotspots, and the suppliers are directly engaged to address any potential issues identified.

In addition to the suppliers in the table below, there are 38 suppliers (comprising approximately \$57.1 million in spend), whose inherent risk changed from FY24 to FY25 due to some refinement in our processes.

Priority Groups	Category	Number of Suppliers	Spend
Priority 1: Operations	Professional Cleaning, Travel and Accommodation	23	\$4.1M
Priority 2: Operations, Manufacturing and Raw Materials	Brickwork, Blockwork, Masonry, Landscaping, Demolition	20	\$27.8M
Priority 3: Manufacturing and Raw Materials	Carpentry, Civil Works, Concrete, Electrical Services, Fire Services, Fit out, Hardware and Consumable, Lits and Escalators, Mechanical Services, Plastering and Rendering, Repair and Maintenance, Roofing	126	\$293.7M

Table 3 – Priority Suppliers by Category



The Property Industry Informed365 platform, developed by the Property Council of Australia (PCA) in collaboration with 17 of the largest property companies in Australia (collectively known as the Consortium), provides a digital means of collecting and collating supplier data relating to their modern slavery exposure in operations and supply chains. It also allows us to collaborate with experts in this space and stay up to date on the latest developments on modern slavery risks and remediation strategies.

3.1.3 Grievance Mechanism and Remedy

The availability and accessibility of grievance mechanisms and remedy options that are “trusted and confidential” are key principles of the UN Guiding Principles on Business and Human Rights.

Hacer upholds high standards of conduct and aims to create a culture that welcomes feedback from all stakeholders to ensure we are operating in alignment with our goals and policies across our operations and supply chains.

3.1.3.1 Grievance Mechanisms

We recognise that giving feedback isn’t always easy, so we have created an easy to access pathway which allows individuals to readily and easily give feedback or highlight concerns about modern slavery, potential human rights issues, or unethical behaviour.

The mechanism is designed 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

Speak Up!

Hacer has partnered with Rely to provide a mechanism to speak up. Our Speak Up! Policies now incorporate personal, whistleblowing and modern slavery grievance-reporting mechanisms, which are supported by the Rely platform.

Depending on the grievance type, the platform is available to Hacer employees and external persons such as subcontractors and their employees.

This mechanism can be accessed through direct engagement with Human Resources, a Whistleblowing officer or a trusted manager, or through Rely, which is available via the Hacer Intranet or a QR code located at each project site. Rely also offers anonymous reporting.

Hacer also provides an independent whistleblowing hotline via Your Call.

Case Management Platform

Rely

In 2025, Hacer partnered with Rely, an all-in-one integrity and employee relations case management platform. The Rely platform allows Hacer’s employees and subcontractors to submit grievances in a formal, consistent and confidential way.

Your Call

Your Call is our independent whistleblowing hotline supported by Rely.

3.1.3.2 Remedy Process

The key purpose of the remediation process is to ensure that any victim of modern slavery is protected, and to guide Hacer in determining the most appropriate pathway for support a victim to return to their personal circumstances prior to modern slavery. Our remediation framework, which is built into the Rely platform, is based on the following UNGP principles:

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



The remediation framework outlines the following steps:

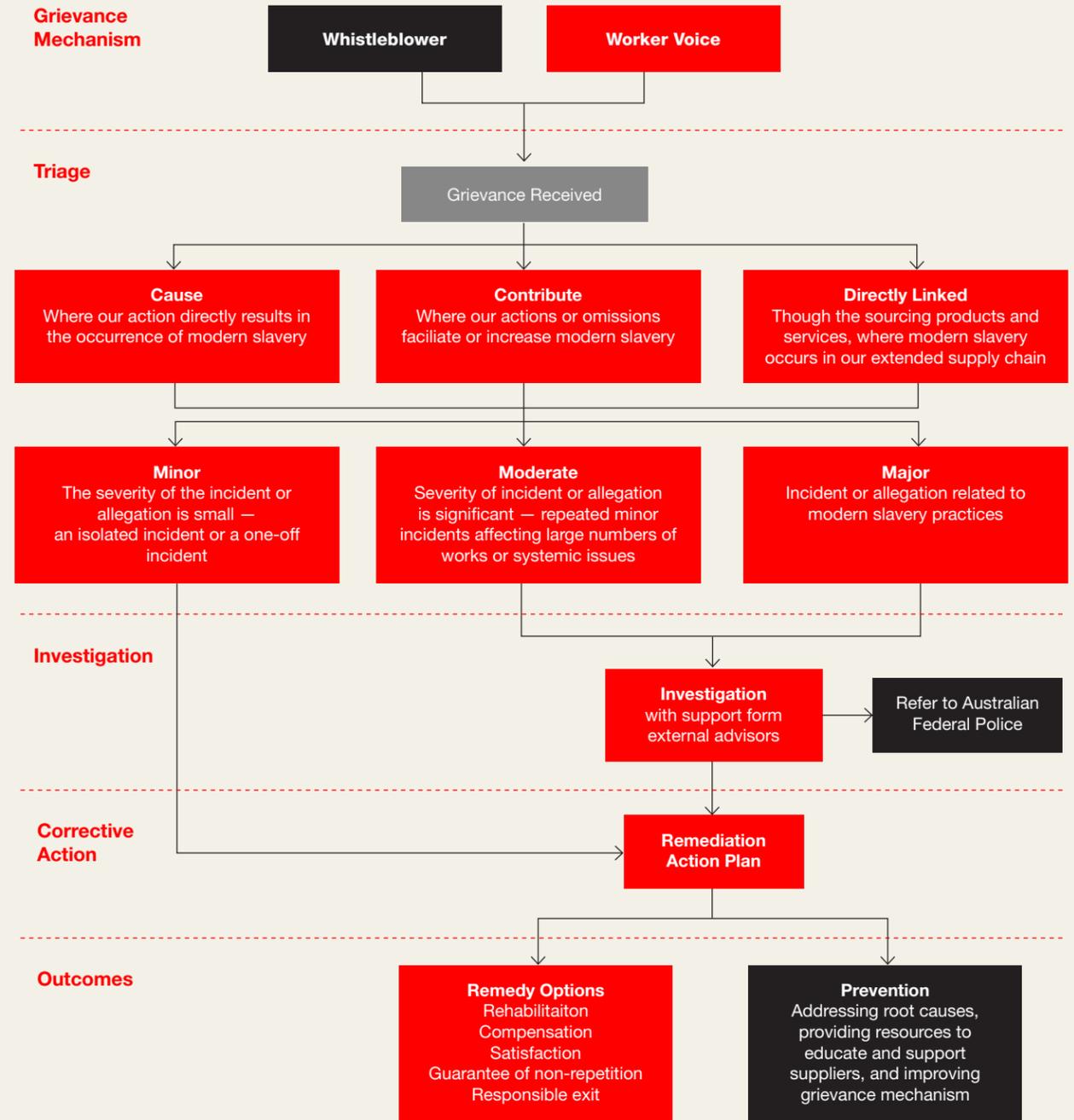


Figure 5 - Hacer's Remediation Process



Where Hacer determines that a modern slavery breach has occurred, we will work with relevant authorities and civil society organisations to support affected persons. We will then take appropriate actions to minimise, and if possible, prevent such an incident 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 by taking action under subcontract or supply arrangements;
- Issuing company wide alerts and updating supplier registers serving to notify all business units that a systemic modern slavery issue with a supplier has been identified; and
- Providing resources to educate and support subcontractors and suppliers to ensure harm does not reoccur.



3.1.4 Enablers

Growing our team’s awareness of, and capability in recognising, modern slavery indicators; collaboration and partnerships with our clients, peers, supplier and advisors; and monitoring and measuring the effectiveness of our anti-modern slavery initiatives are key enablers in meeting our commitments.

3.1.4.1 Awareness and Training

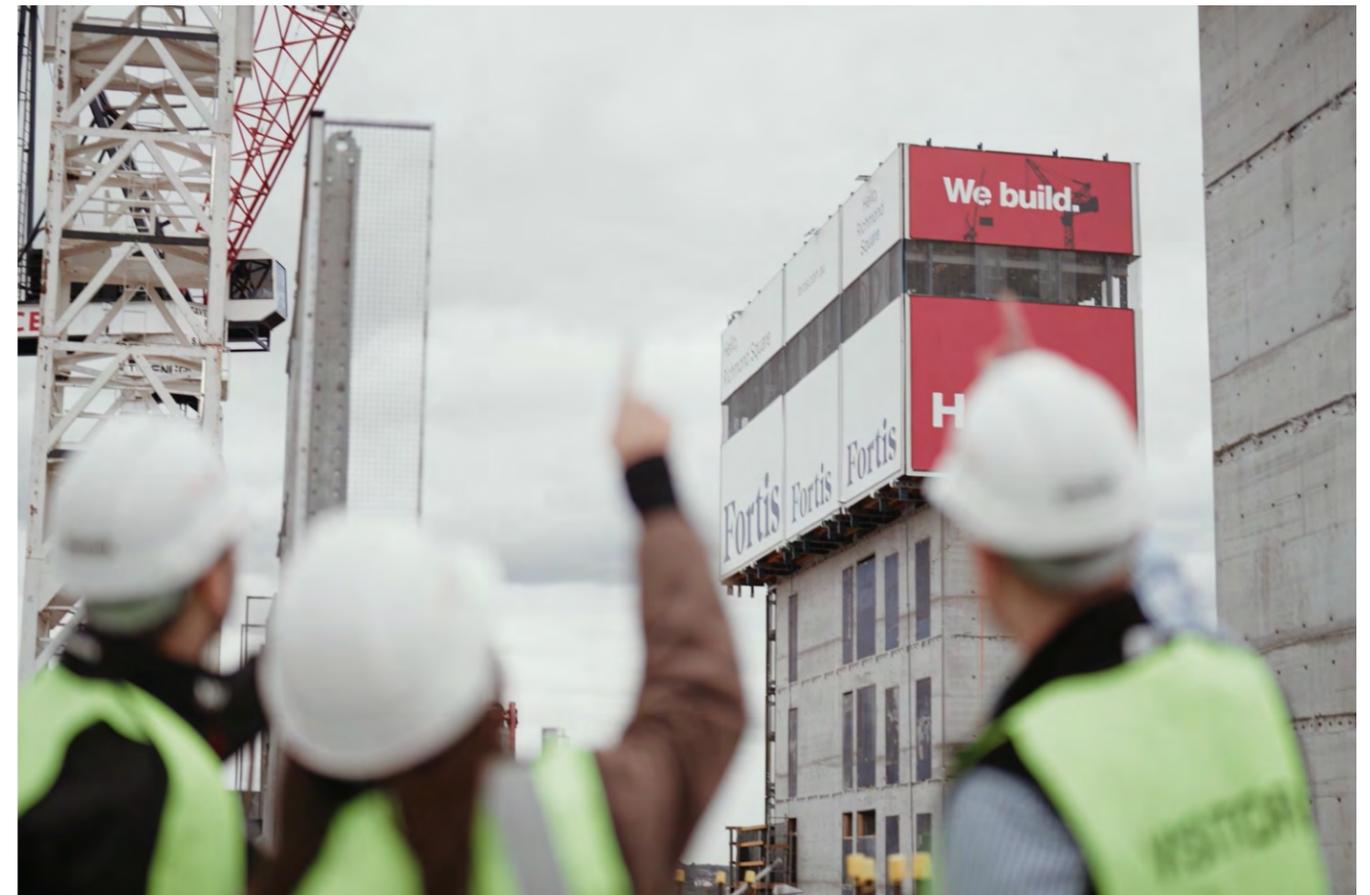
Mandatory Employee Modern Slavery Awareness e-learning

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

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

100%
of Hacer’s employees completed the Modern slavery training in FY25.

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



Training Modern Slavery Training for Suppliers

With the introduction of the Rely platform, we have updated our project site inductions to include information about our Speak Up! Policies and access to the Rely platform via QR code. This information is also available within project site amenities such as the lunchrooms.

3.1.4.2 Measuring and Monitoring Effectiveness

Hacer is committed to long-term meaningful action to combat modern slavery.

To better track progress, we have introduced a number of key performance indicators (KPIs) in FY25. In doing so, we are better able to understand the effectiveness of our interventions and identify any gaps or areas for improvement. Over time, we will add more KPIs and look to develop meaningful targets if and where appropriate.

Our FY25 KPIs show stable supplier numbers and a consistent risk profile, thus reflecting improved accuracy in our inherent risk assessment. Overseas tier one suppliers remain below 1%, with greater exposure expected as tier two supply chain mapping progresses. Supplier engagement increased following the shift to quarterly SAQ reviews, while response rates remained steady at around 35%. Residual risk remains medium, highlighting the need for deeper analysis of SAQ findings to guide targeted support. Overall, FY25 results show improving visibility, with clear opportunities to strengthen engagement and risk mitigation in the year ahead.

FY24 Baseline Year

1351 Suppliers*

<1% Suppliers from overseas

Supplier risk (inherent)

549 Very high

320 High

212 Medium

250 Low

Suppliers engaged SAQ

72

Per year and cumulative

% supplier SAQ response rate

35.85%

Per year/cumulative

Medium

residual supplier risk (SAQ)

*Does not include Excluded spend

FY25

1313 Suppliers*

<1% Suppliers from overseas

Supplier risk (inherent)

501 Very high

322 High

220 Medium

261 Low

Suppliers engaged SAQ

137/207

Per year/cumulative

% supplier SAQ response rate

34.07/34.97%

Per year/cumulative

Medium

residual supplier risk (SAQ)

3.1.4.3 Collaboration and 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.



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, undertaken a review of our due diligence tools and systems, has hosted several workshops with our employees and assisted in the drafting of this modern slavery statement.



Property Council of Australia (Industry peers, knowledge sharing)

Hacer is a member of the Victorian branch of the PCA, the peak industry body for the property sector. The PCA also facilitates and supports the Informed 365 property consortium and best practice resources.

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.

Informed 365 Property Consortium

In collaboration with the PCA, Better Sydney and Informed 365, the property consortium provides industry-specific guidance and resources to assist us in informing our assessment and management of risk.



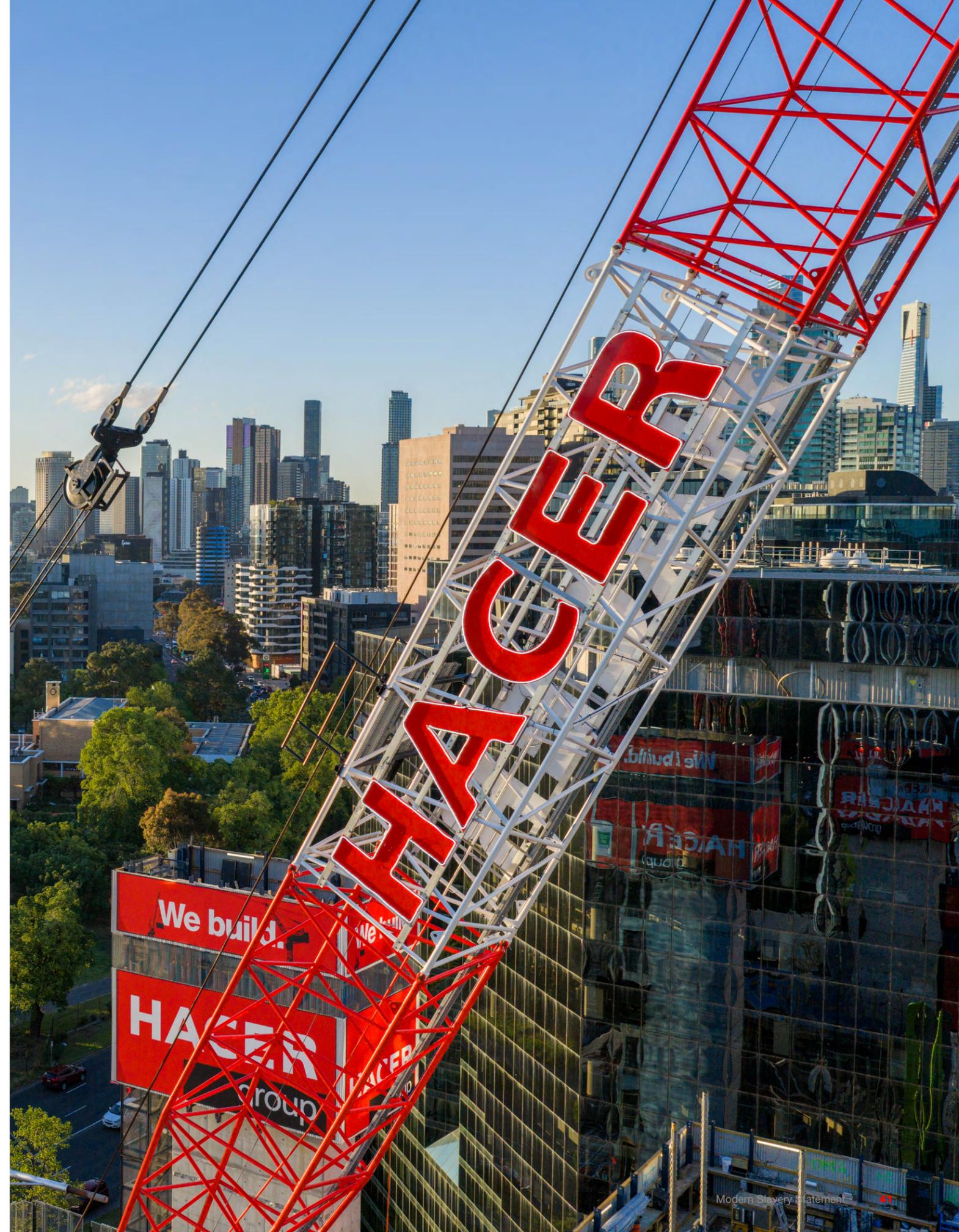
Your Call

Our independent reporting channel.



Rely (Reporting and case management platform)

Our new grievance reporting and management platform.



Future Focus

Area	Governance	Due Diligence	Grievance and Remedy	Enablers Training, Monitoring, Collaboration
Commitment	Review and update procurement process to better integrate modern slavery risks into decision making.	Develop a materials 'deep dive' process.	Provide grievance mechanisms to all employees and subcontractors.	Develop modern slavery guidance for subcontractors. Further develop and refine KPIs. Continue industry collaboration.
Success Criteria	Modern slavery risks are regularly considered as part of our supplier selection process.	Process to be trialled on one very high-risk material.	Information on how to access the grievance mechanism is available at all project locations (offices and amenities).	Trial with one major supplier. Report on KPIs. Continue with Informed 365 Property Consortium and attend various other modern slavery-related industry forums.

Table 5 - Our future roadmap



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This Statement was approved by the Hacer Group Board of Directors on 2 December 2025.
The Statement was approved on behalf of the joined reporting entities.

Paul Toleman
Director

Mark Lewis
Director

Vin Sammartino
Director