

Hacer Modern Slavery Statement

FY24



About this statement

This is a joint Modern Slavery Statement for the financial year ended 30 June 2024 (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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Hacer recognises that our operations can have a real direct and indirect impact on people, 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 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 10 December 2024. 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/>)

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 24 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

751.6m Annual Revenue

70% Repeat Client Work

271 Team Members

17 Sites Currently Under Construction

1bn+ Works Under Construction

350+ Projects Completed

Employment Status (at 30 June 2024)

Full time

190 Permanent¹ Employees

2 Fixed Term² Employees

64 Day Hire Employees

Part time

15 Permanent² Employees

Nil Fixed Term³ Employees

Nil Casual⁴ Employees

271 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 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 1,356⁵ 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.

FY24 Procured Goods and Services

\$702 Million

Direct Suppliers

1,356

Total Spend by Category and Country

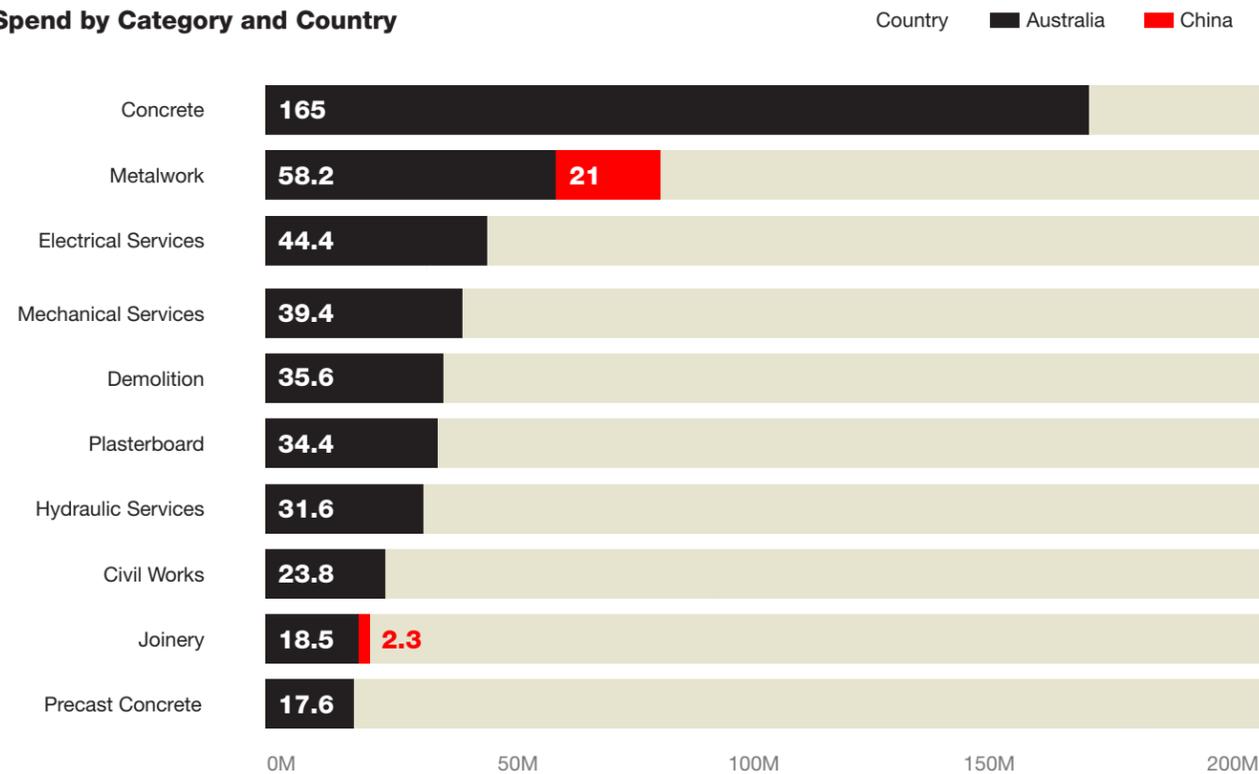


Figure 1 - Hacer Spend by category

⁵This excludes approximately 413 vendors (suppliers) at a total of \$59M (approx. 23% of vendors, and 8% spend), with over 80% of spend in the following 4 categories: Financial and Insurance Services (e.g. Banks, Insurance providers), Employee Reimbursement and Intercompany payments, and Government (e.g. Permits, Tax)

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.



Materials

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.

3%

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 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.

Our Risk Profile

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

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

22%

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

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.

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 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 FY24, 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 3.1.1, applies to all employees.

2.3 Risks in our Supply Chain

In 2023, Hacer engaged Edge Impact to conduct a Social Life-Cycle Assessment (S-LCA) analysis of our spend data against 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.

The S-LCA helped us to identify those areas within our operations and 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.

Our focus continues to be on the priority risk areas identified in the S-LCA, with new suppliers being 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 day to day operations.

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

3.2 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 some greater clarity on our high priority risk areas.

While the S-LCA has help 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 will be engaged via the Informed 365 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 and our suppliers' our leverage to affect change further into the supply chain.

Low level of leverage



High level of leverage

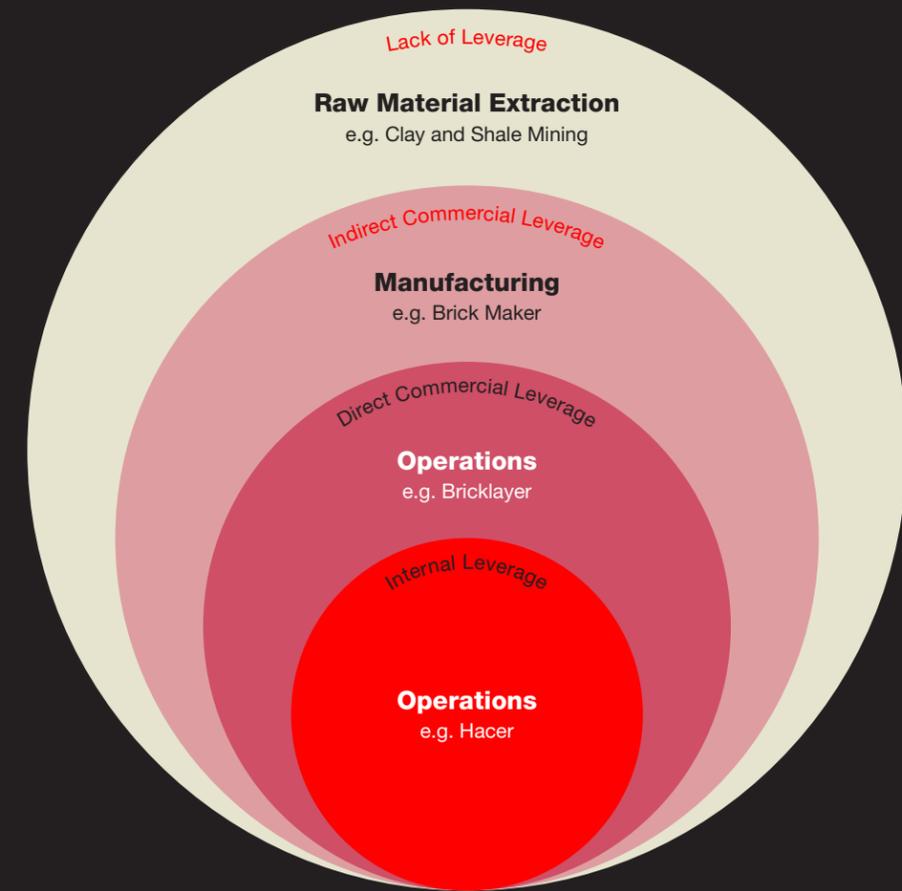


Figure 4 – Supplier Prioritisation Methodology

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.

4.1 Governance Framework



Table 2 – Modern Slavery Governance Framework



4.2 Policies

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

Code of Conduct

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

Human Rights 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).

Modern Slavery Grievance and Remediation Procedure

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.

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.

4.3 Due Diligence

In addition to the S-LCA analysis described in Section 2.3 above, we use the Property Industry Informed365 (I365) platform, which allows us to understand and track the steps taken by our direct suppliers in tackling modern slavery risks in their respective supply chains.

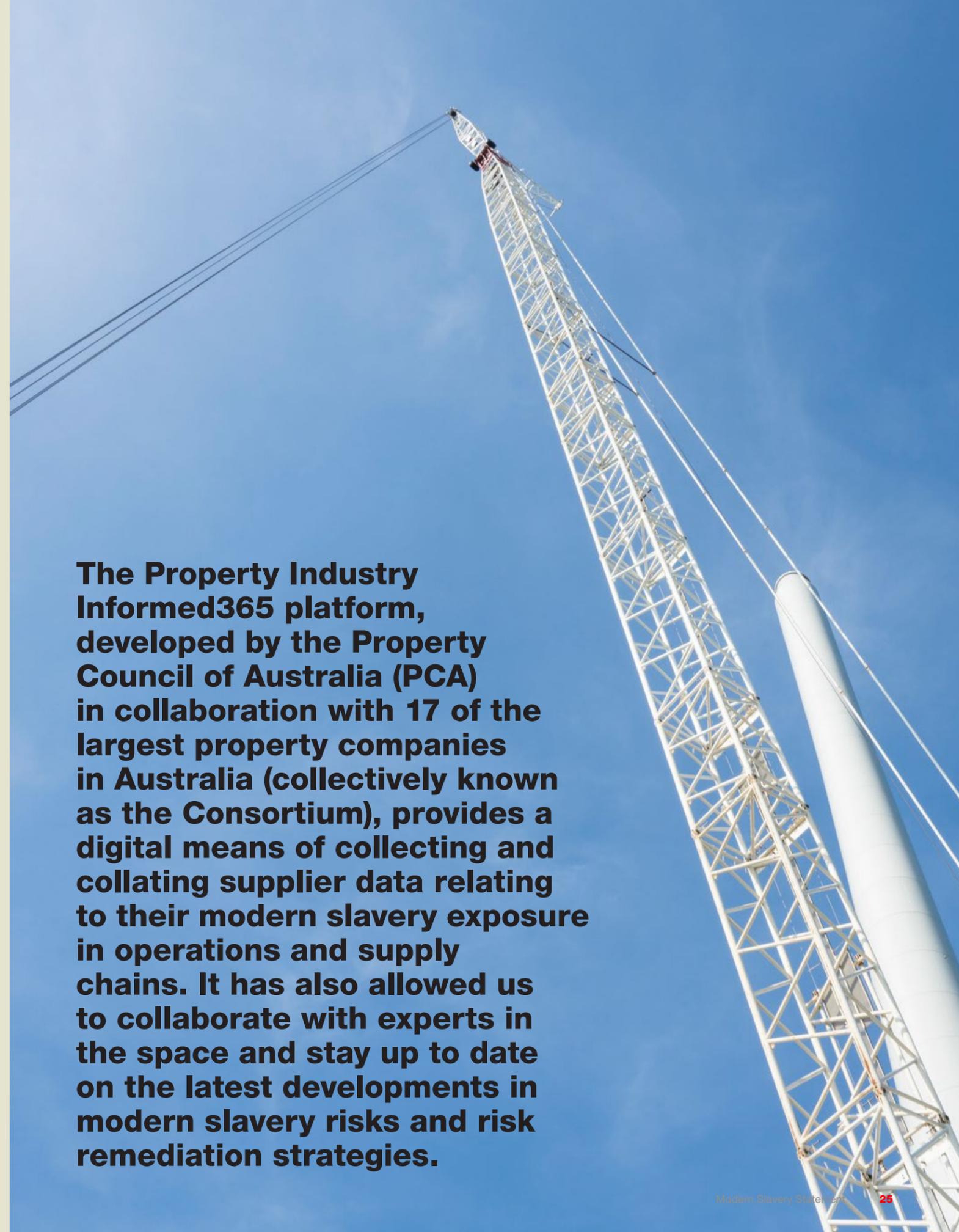
Priority suppliers are invited to join the Informed 365 platform and complete the Suppliers Assessment Questionnaire (SAQ).



Where the SAQ results indicate that a supplier has ongoing (residual) high risk, the SAQ responses are reviewed, and the suppliers directly engaged to address any issues identified.

Priority Groups	Category	Number of Suppliers	Spend
Priority 1: Operations	Professional Cleaning	28	\$2.5M
Priority 2: Operations, Manufacturing and Raw Materials	Brickwork, Blockwork, Masonry, Landscaping, Demolition	42	\$43.5M
Priority 3: Manufacturing and Raw Materials	Concrete, Electrical Services, Mechanical Services, Civil Works, Hydraulic Services, Joinery, Repairs and maintenance, Fire Services, Fit outs, Lifting services, Roofing, Plastering, Hardware consumables, Safety Equipment, Carpentry	479	\$382.3M

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 has also allowed us to collaborate with experts in the space and stay up to date on the latest developments in modern slavery risks and risk remediation strategies.

4.4 Grievance Mechanisms and Remedy

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.

Additionally, 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.

4.4.1 Grievance Mechanisms

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

The mechanism is design 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

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.



4.4.2 Remedy Process

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 the United Nations Guiding Principles on Business and Human Rights:

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

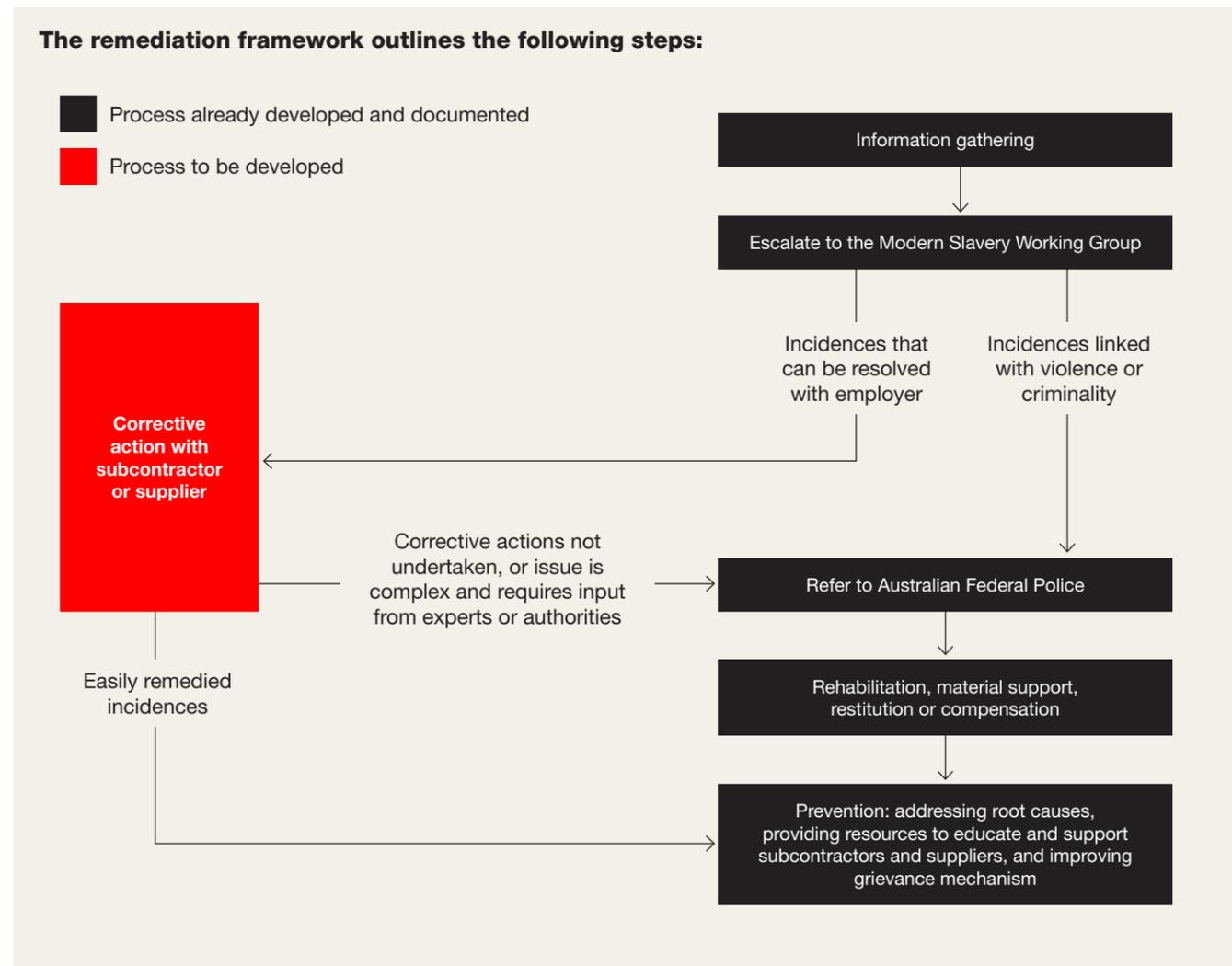


Figure 5 - Hacer's Remediation Process



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.

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 company wide 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.

4.5 Training

Growing our teams 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.

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.

100%

of Hacer's employees completed the Modern slavery training in 2024.

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.



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.

Table 5 - Hacer Modern Slavery Training Framework

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.

Area	Commitment	Status
Governance	Create a 3-year modern slavery roadmap	Edge Impact helped us develop a three year-roadmap based on the findings of the S-LCA analysis undertaken in 2024
	Integrate modern slavery risk management into the Sustainability Framework and Action Plan	Modern slavery risk management has been integrated into Hacer's updated Sustainability Framework under the Our Operations pillar
Risk Assessment	Commence supply chain mapping in one key priority risk category	Commencing in FY25
	Formalise a due diligence and risk assessment process	The due diligence and risk assessment process has been formalised with the development of the Responsible Procurement and Supply chain framework, and the development of the prioritisation methodology. As a result we have identified forced labour, child labour, underpayment, migrant labour and working hours as the salient modern slavery risks across Hacer supply chain
	Undergo a prioritisation activity to identify and articulate Hacer's salient modern slavery/ human rights risks and priorities. Create an action plan for suppliers/subcontractors under these categories	
Risk Management	Continue to refine and develop our Modern Slavery Working Group, consisting of employees across multiple teams	Ongoing
	Continue to implement the modern slavery awareness training module as part of the new employee induction	Ongoing Refer to pg 32 for number of people trained
	Educate and equip commercial and design team members with a communication and action plan to communicate modern slavery risks to subcontractors	Commencing in FY25
Capability and Awareness	Provide board and executive level training in modern slavery (including explanations of Hacer approach)	Ongoing
	Publish the modern Slavery guide for Subcontractors: A guide that provides subcontractors 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 operations and supply chains	Commencing in FY25
Grievance and Remediation	Investigate opportunities to extend grievance accessibility	Commencing in FY25
	Continue the roll out and encourage the use of the remediation framework. Run a trial to ensure there are no gaps in the framework	Commencing in FY25
Collaboration	Consider opportunities to work with industry bodies to build supplier leverage in the medium term	Ongoing collaboration with the Property Consortium

Table 6 - Update on last year's commitments

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.

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)

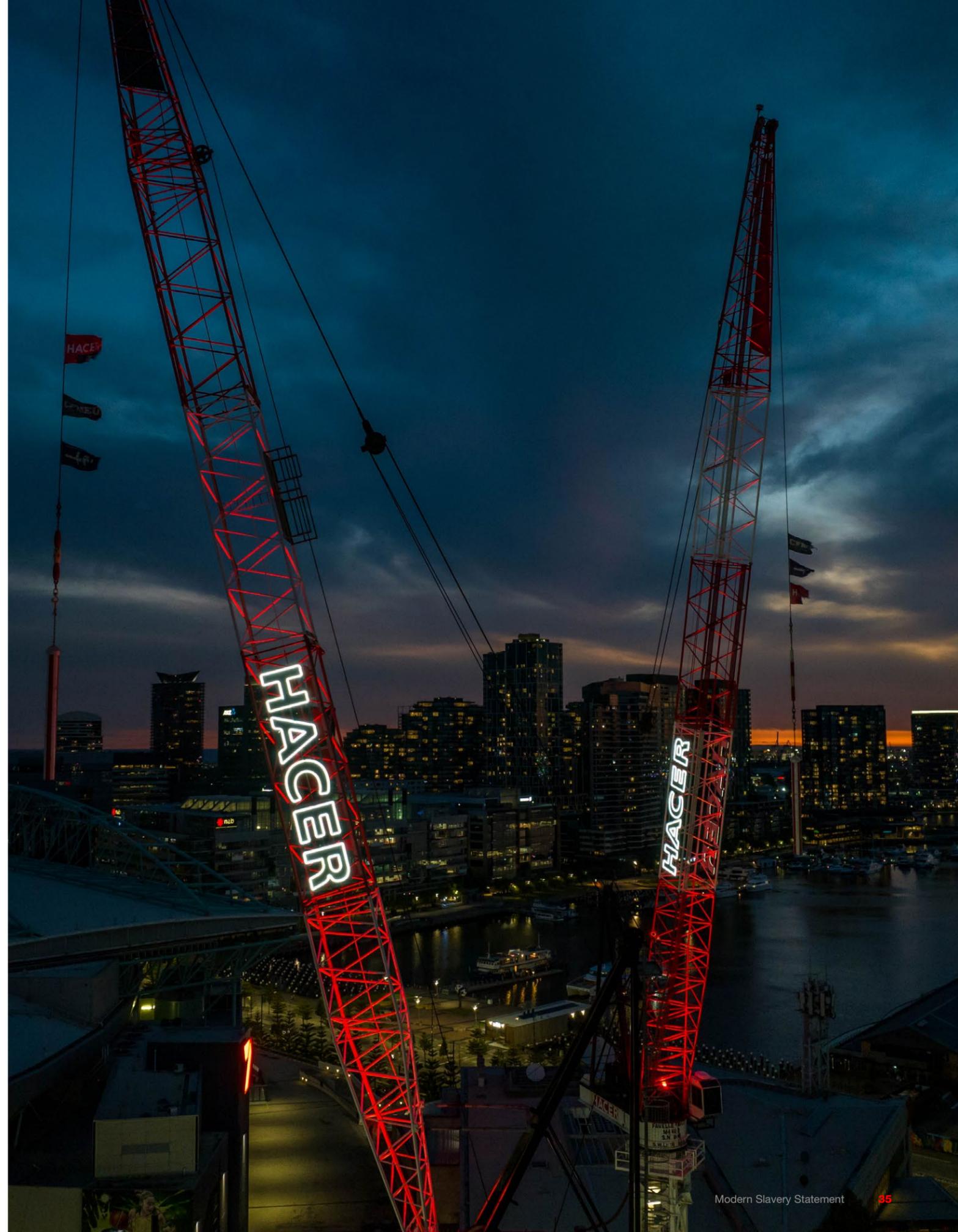
Edge Impact provides trusted professional advice to Hacer in relation to our modern slavery strategy. Edge Impact has performed our Social Life-Cycle Assessment (S-LCA) risk assessment, has undertaken a review of our due diligence tools and systems, has hosted several workshops with our employees and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

Table X - Hacer Modern Slavery Partnerships



Next Steps

Area	Risk Assessment	Risk Management	Capability and Awareness	Grievance and Remediation	Governance
Commitment	Commence supply chain mapping in one key priority risk category.	<p>Report on progress of Supplier engagement via Informed 365.</p> <p>Educate and equip commercial and design team members with a communication and action plan to communicate modern slavery risks to subcontractors.</p>	Publish the modern Slavery guide for Subcontractors: A guide that provides subcontractors 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 operations and supply chains.	<p>Investigate opportunities to extend grievance accessibility.</p> <p>Continue the roll out and encourage the use of the remediation framework. Run a trial to ensure there are no gaps in the framework.</p>	Identifying and establish Metrics including for Employee and Supplier training, supplier engagement, grievance and remedy.
Success Criteria	Supply chain mapping of tier one subcontractors and suppliers is complete.	Design and commercial team members feel equipped to start engaging with subcontractors and suppliers in relation to modern slavery risks.	Subcontractors receive clear instructions and are educated on next steps to reduce modern slavery risk within supply chains.	Grievance and remediation framework has been trialled, with employees clear on its use.	

Table 7 - Our future roadmap



Hacer Group

Hacer Melbourne

222 High Street,
Kew, VIC 3101

T 03 9810 6888

E vic@hacergroup.com.au

Hacer Sydney

Suite 6.06, Level 6,
55 Miller Street,
Pyrmont, NSW 2009

T 02 8570 1300

E nsw@hacergroup.com.au

hacer.com.au

@hacergroup

This Statement was approved by the Hacer Group Board of Directors on 10 December 2024.
The Statement was approved on behalf of the joined reporting entities.

Paul Toleman
Director

Mark Lewis
Director

Vin Sammartino
Director