



Modern Slavery Statement

1 July 2022 – 30 June 2023

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**EDUCATION:
Margaret Hendry
School Expansion (ACT)**

INTRODUCTION

Founded in 1979, Hindmarsh offers specialised construction solutions, with a focus on complex construction projects.

Hindmarsh has a vision of creating leading communities, sustainable buildings and social infrastructure for the future. Hindmarsh delivers projects for a wide range of clients throughout Australia, with a commitment to safety, high quality, integrity, innovation and team work.

For a portfolio of Hindmarsh's work, please visit our website: www.hindmarsh.com.au

Hindmarsh takes its role seriously as an industry leader on ecologically sustainable development, investing in initiatives to improve sustainability and waste management on all its building and development projects.

Hindmarsh is a member of the Green Building Council of Australia and has a strong building portfolio of 5 and 6 Star energy efficient developments. Further, Hindmarsh has an employee wide charity program and actively supports cultural life in Australia.

Hindmarsh Values



Integrity

Maintaining strong ethics, valuing honesty and cementing our reputation for transparency and accountability.



Safety

Creating a healthy and safe working environment for employees, clients and communities.



Innovation

We are progressive and break new ground, finding better ways and being resourceful. We think differently and take calculated risks.



Teamwork

Building friendship and trust, pulling together and helping each other out.



Quality

Going the extra mile and taking pride in our work to deliver the best possible results.

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THIS STATEMENT

This is Hindmarsh's fourth modern slavery statement pursuant to the Modern Slavery Act 2018 (Cth) and is for the reporting period of 1 July 2022 to 30 June 2023.

During the reporting period, Hindmarsh continued to conduct due diligence on its suppliers whilst maintaining its strong governance processes across its operations.

Hindmarsh is aware that modern slavery prevalence continues to rise, and we are committed to continue to evolve our overall modern slavery due diligence framework to mitigate risks of modern slavery throughout our supply chains.

In this regard, we are pleased to set out in this our fourth statement, the actions we have taken, the progress made and our goals moving forward with respect to modern slavery compliance.

This statement was approved by the Board of Hindmarsh Construction Australia Pty Ltd and its subsidiary HCA Queensland Pty Ltd.



John Hindmarsh

Director

Date: 20 December 2023



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CRITERIA 1: REPORTING ENTITY

Reporting Entities: Hindmarsh Construction Australia Pty Ltd ACN 126 578 176 (HCA)
HCA Queensland Pty Ltd ACN 629 849 814 (HCAQ)

Head Office: Level 1, 41/65 Constitution Avenue, Campbell ACT 2612

Website: hindmarsh.com.au



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CRITERIA 2: STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Structure

Reporting entities for the purposes of this statement are HCA and HCAQ.

- HCA – is a private company operating in the Australian Capital Territory, New South Wales and South Australia. HCA is a construction company.
- HCAQ – is a wholly owned subsidiary of HCA and operates in Queensland. HCAQ is a construction company.

Other entities in the Hindmarsh group are not reporting entities for the purposes of this statement or are not of operational relevance.

Operations

Hindmarsh delivers top quality business-to-business and community-focused solutions for its clients. With a commitment to safety, high quality, integrity, innovation and teamwork, Hindmarsh delivers to a wide range of clients throughout Australia.

HCA and HCAQ specialise in project and construction management for local, national and international clients.

Hindmarsh's work expands over different sectors, including:

- Commercial and residential high-rise;
- Infrastructure;
- Education;
- Industrial;
- Sporting;
- Health; and
- Government.

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Locations

Hindmarsh operates predominantly across the eastern seaboard of Australia, locations as follows:



HCA and HCAQ have over 245 employees, with a common director overseeing the entities. The same director and executive leadership team oversee the entities, with the same policies and procedures applying to both entities.

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Supply Chains - Overview

Our suppliers are critical to our business and enable us to carry out our operations and meet project deadlines. Accordingly, we prioritise and value a close working relationship with our suppliers.

Hindmarsh's supply chains are largely made up of the supply and installation of construction related materials, plant and equipment and services.

Hindmarsh also engages a number of suppliers to provide goods and services to support the businesses general operations.

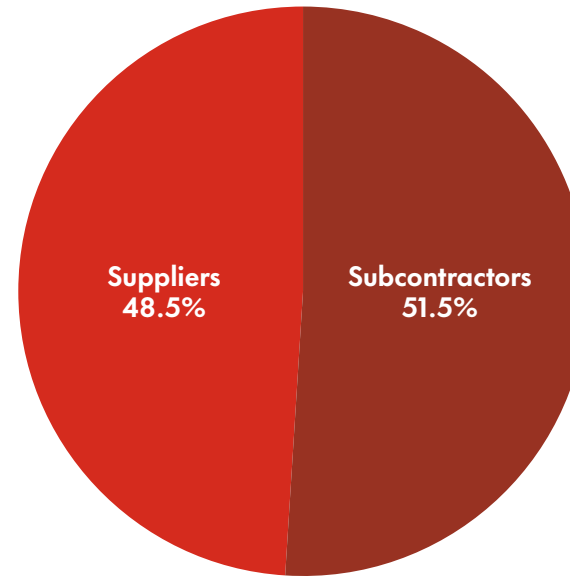
In order to deliver the services for our clients, Hindmarsh's supply chain is dominated by the contracted supply and installation of construction related materials, plant and equipment, and services. We recognise that our diverse range of subcontractors and suppliers have their own intricate and often complex supply chains, which in some cases extend beyond Australian borders.

In the reporting period HCA and HCAQ engaged 1,589 suppliers, consultants and subcontractors, with:

- 48.5% of these being suppliers; and
- 51.5% comprising subcontractors.

A total of 20 of these suppliers and subcontractors made up approximately 26.1% of all spend.

Supply Chain Composition by Volume



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Supply Chains and supplier relationships

Given the project nature of Hindmarsh's operations, subcontractors remain a key component of our project delivery to our clients. As with previous years, generally, Hindmarsh's suppliers are engaged on a project basis, with Hindmarsh having a preferred panel of suppliers to ensure consistency and continuity. Longer term suppliers are typically for goods and services for administrative purposes.

Hindmarsh's supply chains cover a wide range of third parties, with differing levels of complexity. Contributing factors to complexity include the types of projects, lifecycle of projects and the sectors that Hindmarsh services and operates.

A summary of our supply chains (whether via direct suppliers or subcontractors) are as follows:

- Labour Hire and Trades;
- Construction Materials;
- Waste;
- Information Technology;
- Complex Services; and
- Professionals providing design & engineering services.

Hindmarsh is cognisant that the industry it operates within and the complex supply chains that present pose modern slavery risks. Hindmarsh acknowledges this fact and intends to continue to take a targeted risk-based approach to address and mitigate modern slavery risks.

Hindmarsh is open about the challenges that it has faced with gaining an understanding of the deeper parts of its supply chains, but will continue to work on gaining transparency particularly where the highest risks are present.



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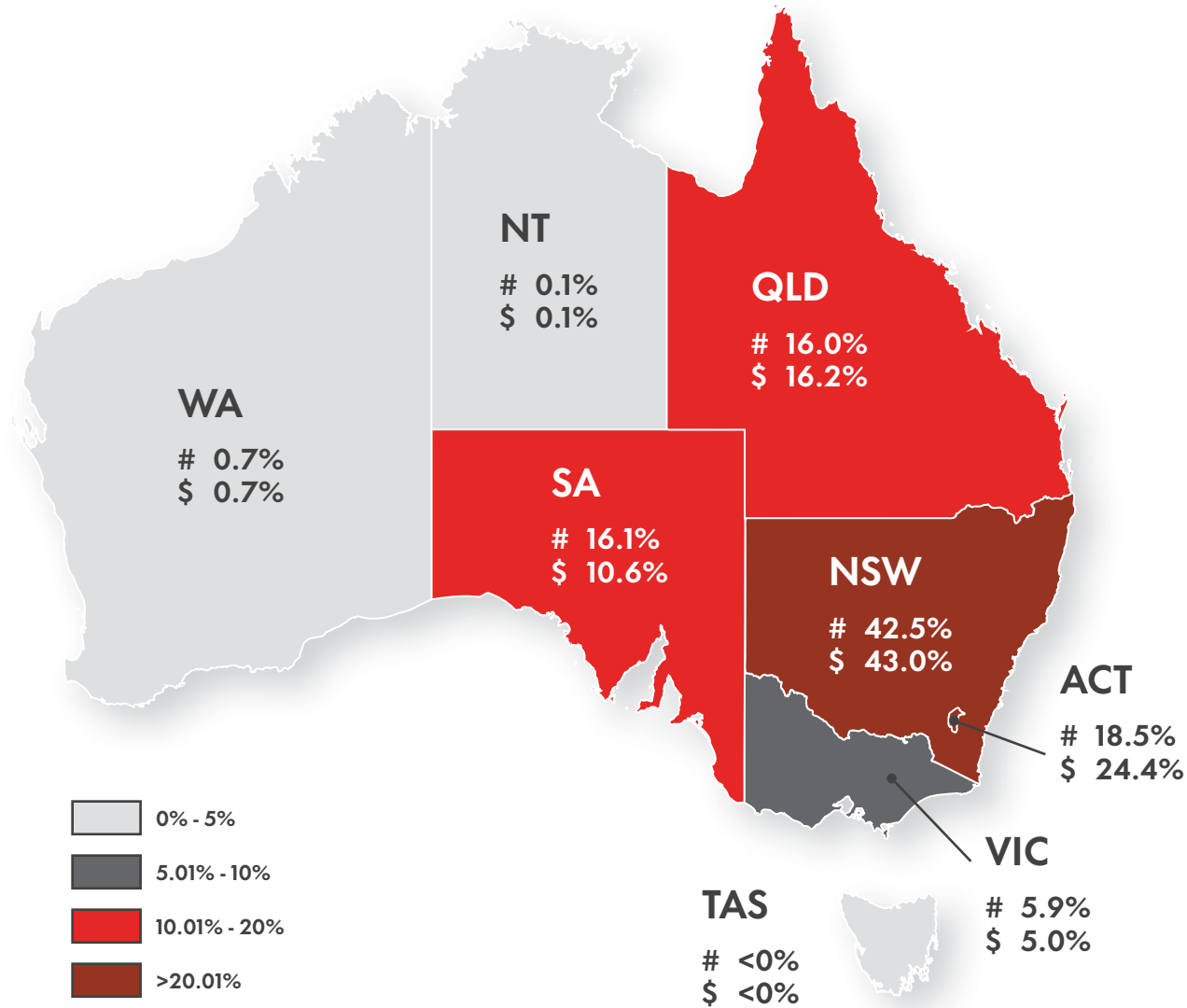
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Locations of our Suppliers - by Volume (#) and Spend (\$)



*Hindmarsh engages one (1) international supplier based in Sri Lanka.

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CRITERIA 3:

RISKS OF MODERN SLAVERY

Hindmarsh considers that the initial step required to assist in mitigating modern slavery risks in its operations and supply chains is to have a strong understanding of our risk profile.

Hindmarsh is cognisant of the inherent challenges posed by modern slavery within the construction industry. These challenges are amplified due to the intricacies of multi-tiered supply chains, which obscure transparency into deeper supply chain layers, as well as the heightened vulnerabilities associated with the procurement of raw materials.

Further, in construction supply chains there are often jobs performed by unskilled labour workers, the work may be dangerous, and working hours might be long. Construction delivery deadlines have the potential to compromise safe working practices. Raw materials from other countries, for example, particularly the polysilicon in solar panels, steel, bricks, timber and glass, are highly susceptible to human rights violations including child and forced labour.

In considering the risks of modern slavery and in accordance with UN Guiding Principles, Hindmarsh considers whether it may cause, contribute to, or be directly linked to modern slavery practices. We also consider potential risks in our operations and supply chains.

Modern slavery risks are assessed in relation to Hindmarsh's potential to:

- Cause modern slavery: the risk that Hindmarsh's operations may directly result in modern slavery.
- Contribute to modern slavery: the risk that Hindmarsh's operations and/or actions in supply chains may contribute to modern slavery, including any acts or omissions by Hindmarsh.
- Be directly linked to modern slavery: the risk Hindmarsh's operations, products or other services may be connected to modern slavery through the activities of another entity.

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Operations

All Hindmarsh employees and contractors are based in Australia and paid in accordance with applicable Australian laws and regulations. Further, Hindmarsh has a strong corporate governance framework which includes a Whistleblower Policy.

The Hindmarsh Whistleblower Policy provides reporting mechanisms including the ability to report anonymously. Furthermore, Hindmarsh's procurement practices involve a layered approval process, which serves to reduce the risk of Hindmarsh contributing to modern slavery.

On site and as part of the overall construction progress, Hindmarsh also has a number of systems in place that allow to business to be aware of work completed and work hours of employees and subcontractors. There are several controls on-site that Hindmarsh employ. These controls revolve around ensuring accurate time information is kept for all site workers. Hindmarsh has had these measures in place not only from a modern slavery perspective but also to ensure compliance with various work health and safety requirements across all worksites. Strong oversight on this front ensures that employees, subcontractors and any labour hire engaged on construction projects are managed appropriately and risks of any extensive labour which could indicate modern slavery risks are mitigated. Whilst delivering projects in line with desired timeframes is a key driver for Hindmarsh, these processes ensure that the operations of the business mitigate modern slavery risks to the fullest extent.

Given the above, the risk of modern slavery practices within the operations of Hindmarsh is considered to be low. The risks associated with labour hire and lack of transparency are explored further within our supply chains section below.

Supply Chains

Various factors can contribute to modern slavery risks and practices, including sector and industry risks, product and services risks, geographical risks and entity risks. All these factors must be considered when analysing risks of modern slavery.

For Hindmarsh, risks of modern slavery may be heightened in third parties that are connected to us via our business relationships. Particular risks are more likely to present deeper in our supply chains where we have less visibility. For the purposes of this statement, our process has been to analyse with our Tier 1 suppliers, with the view to extend our analysis deeper into our supply chains as our compliance framework progresses.

Hindmarsh is particularly focused on identifying modern slavery risks in its supply chains that involve material sourced from:

- overseas regions that have a heightened risk or history of modern slavery;
- domestic industries that can attract unskilled and migrant workers, such as cleaning, security and labour hire; and
- commodities that have a higher risk of modern slavery, including solar panels and bricks.

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Industry	Cause, Contribute or Directly Linked to	Risk of modern slavery
Cleaning	Contribute or directly linked to	The cleaning industry is susceptible to modern slavery practices due to several factors. Firstly, it often relies heavily on low-skilled, low-paid labour, making it attractive to exploitative employers seeking to cut costs. The decentralised and fragmented nature of the industry, with many small subcontractors, can lead to poor oversight and regulation enforcement, allowing exploitation of vulnerable workers. Additionally, the demand for cheap and flexible cleaning services can create conditions where workers, especially migrants and undocumented individuals, are more susceptible to exploitation, including debt bondage, human trafficking, and forced labour.
Security	Contribute or directly linked to	The security industry is at risk of modern slavery practices because it often employs low-skilled and easily exploited workers, including migrant workers and those with limited job options. The emphasis on cost-effective services can lead to poor wages and working conditions. Complex subcontracting and outsourcing can also mean that transparency is limited.
Labour Hire	Directly linked to	<p>The labour hire industry is at risk of modern slavery because it often employs temporary and migrant workers who are more vulnerable to exploitation. Additionally, the industry is made up of many small providers, making it harder to monitor and enforce regulations. The demand for cheap and flexible labour can also lead to worker exploitation as employers cut costs, creating a cycle of vulnerability.</p> <p>Hindmarsh has a robust framework in place at work sites regarding monitoring work hours and how workers 'clock on and off'. This framework demonstrates and reinforces good governance and actions taken to reduce risks of worker exploitation.</p>
Polysilicon (raw material in solar panels)	Directly linked to	The use of polysilicon, a critical component in solar panels and electronics, is associated with modern slavery risks, particularly in Xinjiang, China. These risks encompass forced labour, poor working conditions, and labour exploitation in polysilicon production facilities. Vulnerable populations, including ethnic minorities and migrant workers, often face coercive labour practices, debt bondage, and lack of essential labour protections. The complex supply chains involved in the sourcing of polysilicon further complicates efforts to trace the origin of raw materials.

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Challenges

The reporting period continued to present challenges in the construction industry with respect to supply chain disruptions and rising costs. Hindmarsh is aware that these factors can put pressure on projects and may have impacts on workers deeper down the supply chains.

The opaque nature of manufacturing and construction supply chains and the frequency of subcontracting within the industry presents another level of challenges to Hindmarsh with respect to observing the practices and potential risks within its supply chains.

Hindmarsh acknowledges the tension based on the intersection between environmental and sustainability practices and the increased modern slavery and human rights issues that can be associated with products required on these projects. The raw materials used in solar panels is a key example. Hindmarsh continues to be engaged to work on projects for 'green buildings', often requiring the sourcing of solar panels and batteries. Many of the raw materials used in these products are associated with forced labour and therefore these products carry inherent modern slavery risks. Hindmarsh is continuing to work to balance its obligations and the risks of modern slavery as it works towards building energy efficient buildings for Australia's future.

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In the reporting period analysis continued as to whether Hindmarsh could contribute to modern slavery practices. The outcome of analysis confirmed that Hindmarsh does not knowingly contribute to modern slavery risks therefore any contribution would be inadvertent.



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CRITERIA 4:

ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

As this statement is Hindmarsh’s fourth annual statement, we consider it is appropriate to summarise the significant actions that Hindmarsh have already undertaken and how we will continue to progress our modern slavery compliance practices. The below table shows a summary of the actions and measures we have implemented or begun and those that are in progress with further steps to be taken in a future reporting period.

The actions taken by Hindmarsh to identify and address the risks of modern slavery that have continued during the reporting period can be summarised as follows:

Action	Explanation	Progress
Governance and Oversight	We have now had an established Modern Slavery Working Group (“Working Group”) for a number of years. The Working Group is responsible for our overall modern slavery compliance framework.	Completed
	The Working Group comprises individuals including the Chief Executive Officer, National Commercial Manager, Head of People and Performance and Legal. The Working Group continues to meet regularly to aid the development and continued progress as part of our modern slavery compliance framework.	
	In addition to taking steps internally, the Working Group has engaged a third party specialist to advise and assist Hindmarsh on implementation of additional measures to mitigate the modern slavery risks in our operations and supply chains. Our third party advisers are continuing to assist the expansion of our modern slavery compliance framework	Ongoing
Policies	Hindmarsh previously prepared and adopted its Modern Slavery Policy. This internal framework governs how Hindmarsh approaches modern slavery as an organization and provides internal staff avenues to report any potential modern slavery risks (external or internal) via our robust whistleblowing framework.	Completed

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Action	Explanation	Progress
Policies	In addition to the Modern Slavery Policy, Hindmarsh implemented and has maintained its Supplier Code of Conduct. The Supplier Code of Conduct requires Suppliers to comply with labour and human rights requirements, as well as to prioritise the health and safety of all workers that are engaged by suppliers and subcontractors. This Code is intended to flow to the working conditions of those throughout Hindmarsh's supply chains.	Completed
	Hindmarsh is in the process of implementing a procurement policy. This policy will more closely address particular modern slavery risks associated with procurement of certain materials and products. The intention is that this policy will place further controls and encourage further due diligence on suppliers that present modern slavery risks due to their industry or source of products.	Completed
	As part of its broader policy framework, Hindmarsh has also adopted an anti-bribery and corruption policy and whistleblowing policy.	In Progress
Procurement and supplier due diligence	Hindmarsh continues to work with a third party to conduct screenings on all suppliers and subcontractors during the reporting period. The Due Diligence section below highlights how these reports are generated and reported. More broadly, Hindmarsh has built modern slavery mitigation practices into its overall tender documentation to assess potential suppliers on their ability to mitigate modern slavery risks in their own operations and supply chains.	Complete and ongoing
	Hindmarsh intends to expand its due diligence processes to include more targeted due diligence measures, outlined in the Due Diligence Section below.	
Training	Hindmarsh implemented modern slavery training for new and existing employees. More details about the ongoing training that is provided are outlined below	Completed
Contracting	Hindmarsh has reviewed its subcontract, consultancy and supply contract to strengthen them from a human rights perspective. Our previous statement outlines the additional obligations that are put on our subcontractors to ensure that they are mitigating the relevant modern slavery risks.	Ongoing
	As part of the review of these agreements, Hindmarsh has inserted requirements in its subcontractor agreement requiring subcontractors to report to Hindmarsh each month. Subcontractors are required to certify that they have measures in place to mitigate modern slavery risks. Throughout their engagement, subcontractors continue to report to Hindmarsh on a monthly basis and verify that they continue to take actions to mitigate modern slavery risks within their own operations and supply chains. Hindmarsh also encourages subcontractors to report any actual or suspect instances of modern slavery.	Complete and ongoing

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Employee Training

We continued to undertake training of all new employees to ensure ongoing awareness of Hindmarsh's expectations and requirement with respect to identifying and addressing modern slavery risks in its operations and supply chains.

Training covered the following matters:

- What modern slavery is;
- How to identify modern slavery;
- Risk areas for Hindmarsh;
- Key process changes;
- Requirements for due diligence; and
- Hindmarsh's modern slavery strategy.

Due Diligence

Screenings

Hindmarsh regularly screens all new suppliers and subcontractors using global analytics software, including by committing to undertake due diligence and screening of key suppliers and subcontractors prior to awarding large subcontract packages, in order to identify whether any have adverse modern slavery or other Environmental, Social, and Governance (ESG) related findings by authorities. Specifically, the screening tool screens against the following areas:

- Integrity risks
- Environment, social and governance risks
- Data and cyber risks
- Operational and quality risks
- Identity risks
- Financial risks.

While no suppliers or subcontractors received adverse modern slavery findings, where other adverse ESG related findings have been identified by these searches, the Working Group has considered and determined appropriate arrangements with respect to the relevant supplier or subcontractor, which include assessing the nature of the supplier or subcontractor's engagement and ensuring regular reporting by the relevant supplier or subcontractor.

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Risk Matrix

The development of our risk matrix to focus on the highest risk suppliers will form a key part of Hindmarsh's expansion of the modern slavery compliance framework.

Already underway, the risk matrix is based on data provided from sources including the Walk Free Foundation Global Slavery Index and the Global Corruptions Perception Index. The risk matrix assesses the risk profile of a supplier based on the industry that the supplier operates within and where the supplier is located. Hindmarsh is aware that many of its suppliers also engage immediate suppliers that operate in countries where modern slavery is more prevalent. This will form part of the overall risk matrix and how suppliers are classified.

Questionnaires

Whilst the screening process and analytic software has been invaluable to Hindmarsh as a preliminary due diligence tool, Hindmarsh understands that further steps are required to gain a deeper understanding of its entire supply chains and the risks that lie within, particularly those that do not present from our immediate suppliers but lie deeper down the supply chains.

During the reporting period, Hindmarsh's Working Group in conjunction with its third party advisors considered the most appropriate way to gather more information about Hindmarsh's supply chains. Hindmarsh is committed to taking genuine steps and acknowledges the inherent challenges associated with obtaining this kind of information.

Accordingly, Hindmarsh is investigating a robust update to its IT systems to allow this data to be captured during onboarding of new suppliers and for questionnaires to be issued to existing suppliers. Whilst this project is in its early stages, Hindmarsh is confident that these changes will allow Hindmarsh to gain a greater level of collaboration with its suppliers and ultimately will help Hindmarsh to analyse its supply chains at a more granular level.



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CRITERIA 5: EFFECTIVENESS OF ACTIONS

Hindmarsh is consistently reviewing its current actions to measure their effectiveness and to make change as required.

The decision to expand the due diligence process was largely as a result of this annual assessment. Hindmarsh felt that it had a strong understanding of surface level modern slavery risks across all areas of the business. However, the Working Group acknowledges the limited transparency that Hindmarsh still has over its more complex supply chains, particularly where suppliers engaged have off-shore suppliers in regions that are likely to be more susceptible to modern slavery practices (given the industry). As such, Hindmarsh has committed to expanding its due diligence to attempt to gain more insight into how its direct suppliers are ensuring that modern slavery risks do not present deeper down the supply chains.

In addition to this, Hindmarsh continues to amend its existing policy framework to ensure that each policy remains relevant and purposeful.

As stated in our previous statement, Hindmarsh is working towards a formal audit framework which will assess the following:

- compliance with policies and procedures such as the Hindmarsh Modern Slavery Policy;
- reviewing the number of third parties such as suppliers and subcontractors who had due diligence conducted;
- benchmarking Hindmarsh itself and key third parties connected to us;
- auditing a supply chain; and
- reviewing the number of employees to complete modern slavery training.

Auditing of this nature will then in turn influence key performance indicators, together with gaps and areas of our framework that require improvement.

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CRITERIA 6: CONSULTATION

HCA and HCAQ are governed by the same director and executive leadership, policies and procedures. On this basis, consultation between the entities was extensive, with key stakeholders being engaged and consulted. Further, the Hindmarsh Modern Slavery Working Group was established with executives across HCA and HCAQ who contributed to the actions described in this statement as well as the development of this statement. The same contracts apply to both entities and the same personnel review supplier tender submissions and risk.

The Board provides general oversight and the Modern Slavery Working Group reports to the CEO who is responsible to the director.

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CRITERIA 7 - LOOKING FORWARD

Over the next reporting period, Hindmarsh will continue to build upon the progress made to date and engage its stakeholder groups to seek opportunities for improved awareness, due diligence and cooperation amongst all parties.

Hindmarsh is reviewing and looking to expand the framework for conducting due diligence, including the process for issuing questionnaires and taking a deeper dive into our supply chains.

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