



# Modern Slavery Statement

1 July 2024 – 30 June 2025

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**GOVERNMENT:**  
Australian War Memorial Bean  
Building & Central Energy Plant

# 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](http://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 sixth modern slavery statement pursuant to the Modern Slavery Act 2018 (Cth) and is for the reporting period of 1 July 2024 to 30 June 2025.

During the reporting period, Hindmarsh continued to evolve our modern slavery compliance framework and in this statement we set out our continued actions to address modern slavery risks.

Hindmarsh is aware that modern slavery prevalence continues to rise, particularly with international events such as wars, climate change induced disasters and broader conflicts putting vulnerable populations at risk. Hindmarsh continues to be committed to evolve our overall modern slavery due diligence framework to ensure that we continue to assess risk with regarding to modern slavery in our supply chains.

We set this out in our sixth modern slavery statement, including the actions we have taken, the progress made, and our goals for future reporting periods.

This statement was approved by Rowan John Hindmarsh, the sole director and principal governing body of Hindmarsh Construction Australia Pty Ltd.



**Rowan Hindmarsh**  
Director/CEO

Date: 18 December 2025

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# CRITERIA 1: REPORTING ENTITY

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**Reporting Entities:** Hindmarsh Construction Australia Pty Ltd ACN 126 578 176 (HCA)\*

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

**Website:** hindmarsh.com.au

\*In prior periods, Hindmarsh has lodged a joint modern slavery statement pursuant to section 14 of the Act with the wholly owned subsidiary HCA Queensland Pty Ltd ACN 629 849 814 ("HCAQ"). During the FY25 reporting period, HCAQ did not meet the reporting threshold and ceased operations in June 2025. Accordingly, this is a single modern slavery statement pursuant to section 13 of the Act.



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# CRITERIA 2: STRUCTURE, OPERATIONS AND SUPPLY CHAINS

## Structure

The reporting entities for the purposes of this statement are HCA and HCAQ (collectively referred to as “Hindmarsh”).

- HCA – is a private company operating in the Australian Capital Territory, New South Wales and South Australia. HCA is a construction company.
- HCAQ – An included entity in this modern slavery statement is HCA Queensland Pty Ptd ACN 629 849 814 (“HCAQ”), a wholly owned subsidiary of HCA. HCAQ was a construction company in Queensland which ceased operations in June 2025. HCA and HCAQ are collectively referred to as “Hindmarsh” throughout this statement.

There are other non-operating entities within the Hindmarsh group which are not reporting entities or otherwise captured, under this statement.

Hindmarsh is supported by an Advisory Board consisting of the Hindmarsh family which oversees our compliance and governance obligations. Our Leadership Team then drives our day-to-day operations.

In terms of modern slavery compliance, the Director/CEO provides general oversight over our modern slavery compliance framework and our Modern Slavery Working Group.

The Modern Slavery Working Group directly reports to the Director/CEO.

## 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.

Hindmarsh specialises 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. Our operating locations are as follows:



HCA and HCAQ have over 271 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 close working relationships with our suppliers.

Hindmarsh's supply chains largely fall into two categories:

1. Supply and installation of construction related materials, plant and equipment and services.
2. Goods and services to support the businesses general operations.

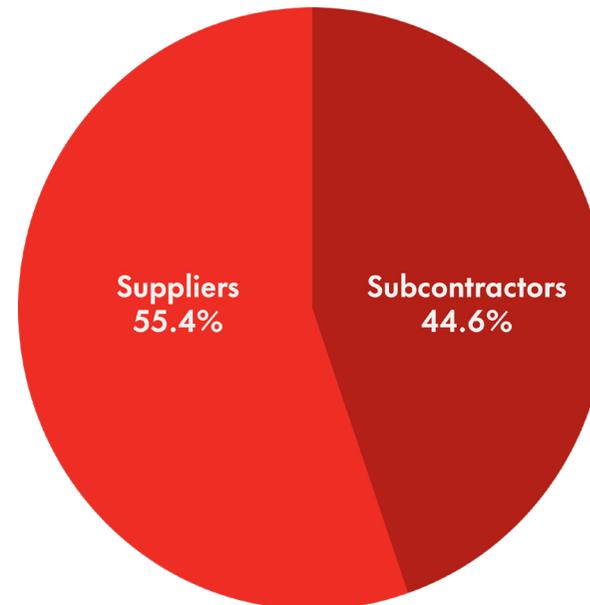
In order to deliver the services for our clients, Hindmarsh's supply chain is dominated by the contracted supply and installation of construction related materials, plant and equipment, and services. We recognise that our diverse range of subcontractors and suppliers have their own intricate and often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

In the reporting period Hindmarsh engaged 1,620 suppliers, consultants and subcontractors, with:

- 55.4% of these being suppliers; and
- 44.6% comprising subcontractors.

A total of 20 of these suppliers and subcontractors made up approximately 36.1% of all spend.

## Supply Chain Composition by Volume



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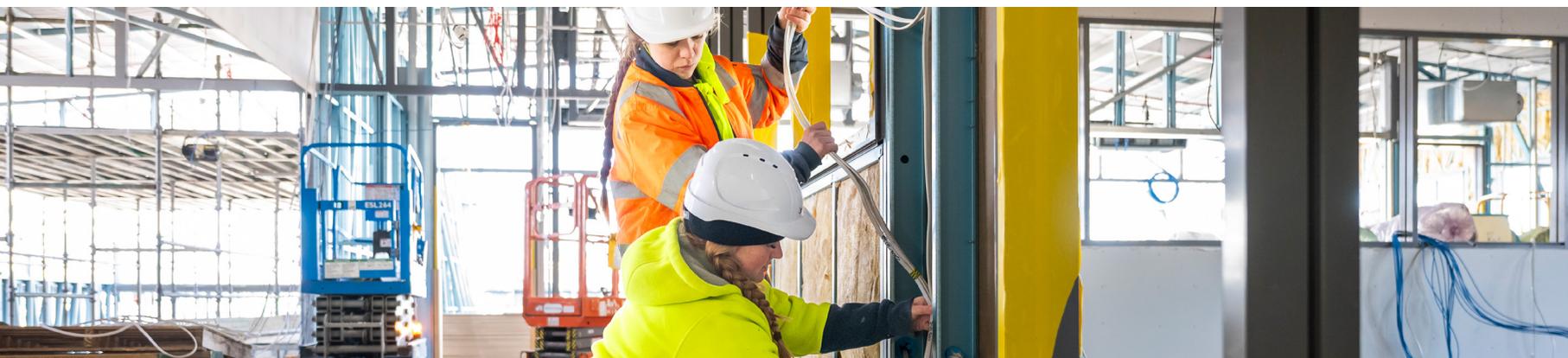
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## Supply Chains and supplier relationships

Given the project nature of Hindmarsh's operations, subcontractors remain a key component of our project delivery to our clients. This means that, generally, Hindmarsh's suppliers are engaged on a project-by-project basis, with Hindmarsh having a preferred panel of suppliers to ensure consistency and continuity of supplier relationships. 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 key 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 it engages with, pose heightened modern slavery risks. Hindmarsh takes a targeted risk-based approach to address and mitigate these modern slavery risks within its operations and supply chains.



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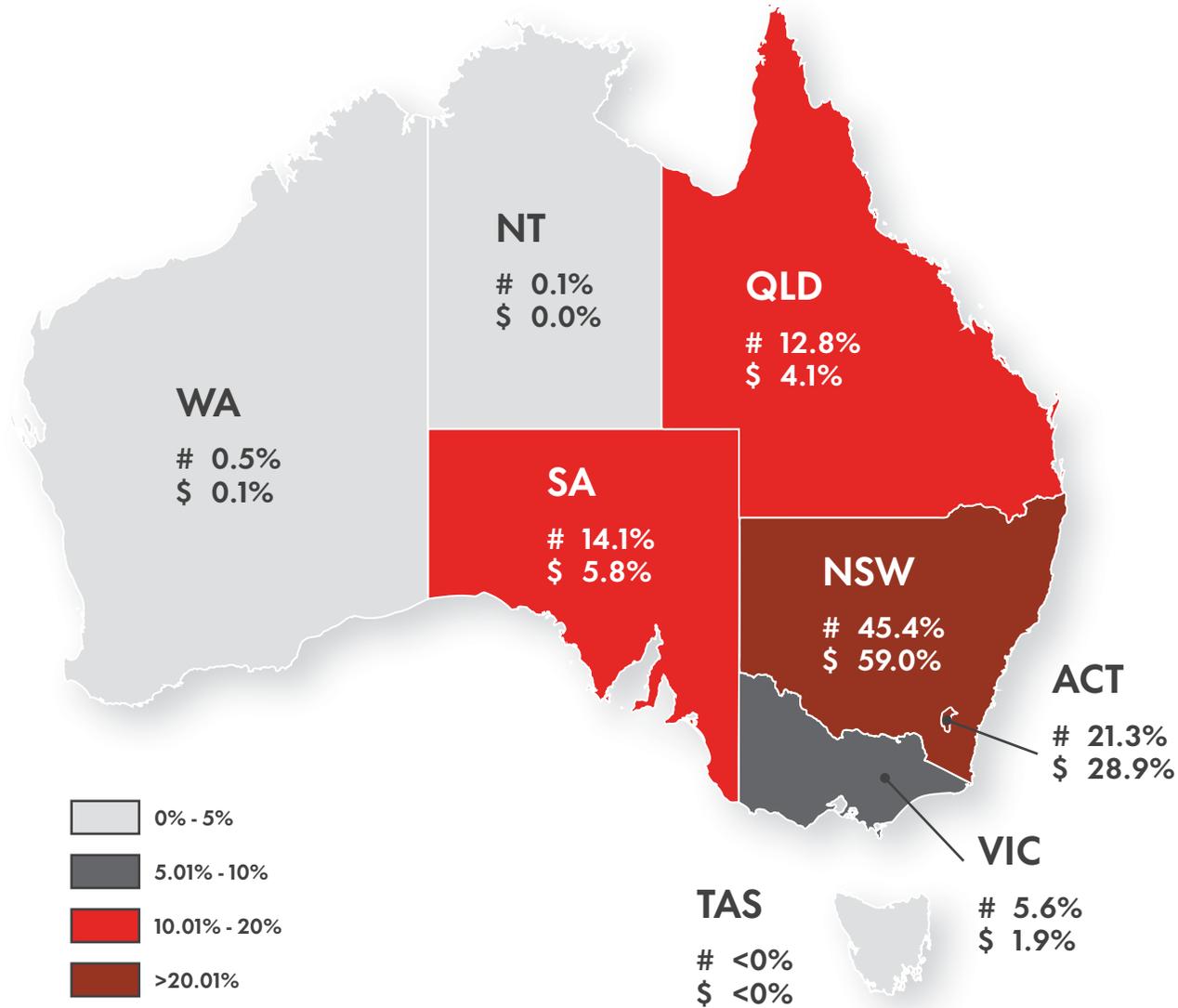
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## Locations of our Tier 1 Suppliers - by Volume (#) and Spend (\$)



\*Hindmarsh engages four (4) international suppliers based in Sri Lanka, Vietnam, China and the US.

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# CRITERIA 3:

## RISKS OF MODERN SLAVERY

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### General construction industry risks

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 certain raw materials.

Further, in construction supply chains, modern slavery risks can be amplified due to the prevalence of risk factors such as:

- jobs being performed by unskilled labour workers;
- dangerous working conditions; and
- long working hours; and
- tight construction delivery deadlines have the potential to compromise safe working practices.

Additionally, certain raw materials from other countries are more susceptible to human rights violations, including child labour and forced labour. Specific examples include polysilicon in solar panels, steel, bricks, timber, lime and cement materials, textiles, clay, natural rubber and glass.

### Cause, contribute or directly linked to framework

The first step in Hindmarsh's due diligence framework is to ensure that we have a strong understanding of our operational and supply chain risk profile which enables targeted, risk based due diligence to be undertaken to address and mitigate these risks.

When considering our operational and supply chain modern slavery risks of modern slavery, Hindmarsh utilises the UN Guiding Principles "cause, contribute to, or directly linked to" framework to consider whether it may cause, contribute to, or be directly linked to modern slavery practices.

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.  
*For example, directly engaging migrant workers and withholding their passport and / or other identity documents.*
- **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.  
*For example, imposing tight deadlines on a supplier resulting in the use of child labour to meet project deadlines.*
- 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.  
*For example, engaging a supplier that is then later found to be utilising forced labour to produce its goods.*

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## Operations

Despite the general risks associated with the construction industry outlined above, Hindmarsh considers that the risk of modern slavery occurring in its operations is low.

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 grievance mechanisms and a Whistleblower Policy which allows employees and other eligible whistleblowers to report grievances and concerns, including any modern slavery concerns.

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

As outlined above, the construction industry carries heightened modern slavery risks. On site and as part of monitoring the overall construction process, Hindmarsh has a number of systems in place that allow the business to be aware of work completed and the working hours of employees and subcontractors. There are also several controls on-site that Hindmarsh employs that 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.

During this reporting period, Hindmarsh rolled out a modern slavery training module to new employees. More details on this are outlined in Criteria 4. Ensuring that employees are trained on modern slavery is critical to ensuring that employees can assist with identifying underlying modern slavery indicators.

## 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 and control over these suppliers. We have focused our efforts on analysing, and monitoring the risk profiles of, our Tier 1 suppliers.

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
<b>Cleaning</b>	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.
<b>Security</b>	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.
<b>Labour Hire</b>	Directly linked to	<p>The labour hire industry carries many heightened risk factors for modern slavery primarily due to the prevalence of temporary and migrant workers who are more vulnerable to exploitation. Another key risk indicator in the labour hire industry is the payment of recruitment fees by the worker back to the agency.</p> <p>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 or impose tight deadlines, 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>
<b>Polysilicon (raw material in solar panels)</b>	Directly linked to	<p>The use of polysilicon, a critical component in solar panels and electronics, is associated with modern slavery risks, particularly when the polysilicon originates from specific high risk regions. These risks encompass forced labour, poor working conditions, and labour exploitation in polysilicon production facilities.</p> <p>Vulnerable populations, including ethnic minorities and migrant workers, often face coercive labour practices, debt bondage, and lack of essential labour protections in this jurisdiction. Furthermore, the complex supply chains involved in the sourcing of polysilicon further complicates efforts to trace the origin of raw materials and assess the modern slavery risks associated with the procurement of solar panels.</p>

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Industry	Cause, Contribute or Directly Linked to	Risk of modern slavery
Steel	Directly linked to	<p>Steel is a high-risk raw material for modern slavery particularly when sourced from certain jurisdictions.</p> <p>The production of steel has been linked to instances of child labour, forced labour and bonded labour in certain jurisdictions.</p>
Bricks	Directly linked to	<p>Bricks are high risk raw materials and can be associated with hazardous, laborious and physically demanding working conditions in certain jurisdictions.</p> <p>In high-risk geographical locations, there are identified instances of workers working 12-18 hours per day in the brick kilns and being subject to exploitative and poor health conditions and wage withholding practices.</p>
Other Construction Raw Materials	Directly linked to	<p>There are other construction raw materials that, when sourced from particular jurisdictions, are considered to be high risk for modern slavery. Examples of these high-risk raw materials and accompanying jurisdictions are outlined below:</p> <p><i>Cement: North Korea</i></p> <p><i>Timber and lumber: Brazil, Cambodia, North Korea, Peru, Russia, Vietnam, Belarus.</i></p> <p><i>Rubber: Burma, Cambodia, Indonesia, Liberia, Philippines, Vietnam.</i></p> <p>Many of the above raw materials have been found to have been produced by child and forced labour.</p>

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## Challenges

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 each reporting period, we refresh our analysis as to whether Hindmarsh could contribute to modern slavery practices in its operations or supply chains. The outcome of this analysis again confirmed that Hindmarsh does not knowingly contribute to modern slavery risks therefore any contribution would be inadvertent via links in our value chain.



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# CRITERIA 4:

## ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

This statement is Hindmarsh’s sixth annual modern slavery statement. The focus of this reporting period has been to expand our employee modern slavery training to ensure broader business awareness of modern slavery risk indicators and roll out our Procurement Policy and Supplier Code of Conduct to ensure that we have adequate policy and procedure backing to our modern slavery compliance framework, whilst continuing due diligence on our Tier 1 suppliers.

The table below summarises the key actions that Hindmarsh has implemented in this reporting period.

Item	Action	Progress
<b>Procurement Policy</b>	<p>The Procurement Policy was implemented during the reporting period.</p> <p>This Procurement Policy complements our existing policy suite (outlined further below) and outlines the modern slavery risks associated with the procurement of certain materials and products.</p> <p>The Procurement Policy will place additional controls in the procurement process and encourage further due diligence to be conducted on suppliers who present heightened modern slavery risks (for example, because of the jurisdiction in which they operate or the products that they supply).</p>	Completed
<b>Supplier Code of Conduct</b>	The Supplier Code of Conduct was introduced during the reporting period. The Supplier Code of Conduct outlines the expectations that Hindmarsh has over its suppliers regarding modern slavery compliance.	Completed
<b>Employee Training</b>	Employee modern slavery training rolled out to 18 new employees.	Completed
<b>Risk screenings conducted on suppliers</b>	Risk screenings undertaken on all 1,481 suppliers engaged during the reporting period.	Completed

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## Policies and Procedures

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During the reporting period, Hindmarsh developed and rolled out its Procurement Policy which outlines Hindmarsh's procurement procedures and guidelines. The Policy clearly prescribes specific modern slavery risks and considerations when procuring certain materials and products and the due diligence processes that should be undertaken where heightened modern slavery risks present.

This will complement our suite of existing policies in governing our modern slavery compliance and our broader compliance efforts. A description of how each policy or procedure operates within our modern slavery compliance framework is outlined below:

- **Modern Slavery Policy** – outlines our approach to our modern slavery compliance framework and our dedication to undertake actions to address and mitigate our risks of modern slavery in our operations and supply chains.
- **Supplier Code of Conduct** – outlines our expectations for our suppliers in addressing modern slavery risks and broader environmental, social and governance expectations. This was introduced during this reporting period.
- **Whistleblower Policy** – provides a framework for eligible whistleblowers, including suppliers and employees, to report on eligible disclosures, including modern slavery concerns.
- **Anti-Bribery and Corruption Policy** – outlines Hindmarsh's stance against bribery and corruption and the processes and procedures for mitigating the risk of bribery and corruption practices in its organisation.



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## Due Diligence

### Risk Screenings

During the reporting period, Hindmarsh screened all 1,481 suppliers engaged during the reporting period using a global analytics screening tool.

The screening tool screens against modern slavery and human right risks as well as broader ESG risks such as:

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

While the screening results came back with no modern slavery adverse findings for our suppliers, where other adverse ESG related findings have been identified by these searches, the Modern Slavery Working Group considers these findings and determines appropriate arrangements for monitoring and addressing these risks. For example, ongoing monitoring of the supplier or subcontractors engagement and ensuring that there is regular reporting by the relevant supplier or subcontractor back to Hindmarsh.

#### Case Study - Risk Screening Findings of Modern Slavery Risk Indicators

The risk screening process identified modern slavery risk indicators relating to work health and safety and labour rights violations in a sample of suppliers. Work health and safety and labour rights violations are modern slavery risk indicators because whilst they are not explicit instances of modern slavery, these risk indicators show practices within organisations that could lead to workers being placed in conditions of modern slavery.

Given the correlation between dangerous working conditions, breaches of work health and safety and labour rights legislation and modern slavery, understanding these risks allows Hindmarsh to monitor these high-risk supply chains and target due diligence towards addressing these modern slavery risks.

### Risk Matrix

Our risk matrix is utilised to assess the inherent risks of our suppliers and considers risk factors such as:

- Jurisdiction risk – For example, a supplier who operates in a high risk country.
- Entity risk - For example, an entity with labour rights violations.
- Product / service-based risks – For example, products containing polysilicon such as solar panels.
- Sector and industry risk – For example, the solar panel industry.

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The risk matrix is based on data provided from sources including the Walk Free Foundation Global Slavery Index and the Global Corruptions Perception Index. Hindmarsh is aware that many of its suppliers also engage immediate suppliers that operate in countries where modern slavery is more prevalent, which will form part of the ongoing development of the risk matrix and how these suppliers are classified. The risk matrix is critical to informing inherent risk ratings of our suppliers (in combination with any findings identified through the risk screening process) and therefore our future due diligence activities, for instance, due diligence can be prioritised on suppliers who are based in higher risk jurisdictions or provide higher risk services or goods.

## Questionnaires

Hindmarsh issues modern slavery questionnaires primarily to suppliers that:

- have a high-risk inherent risk rating (as identified through the risk matrix and risk screening processes described above);
- source materials or solar panels from overseas jurisdictions (in particular, façade materials and other materials sourced from high- risk jurisdictions); or
- are involved in either the cleaning or security industry (which have been identified under Criteria 3 as high-risk industries).

Whilst no further modern slavery questionnaires were issued during this reporting period, in the last reporting period, Hindmarsh issued modern slavery questionnaires to thirty (30) suppliers. In the next reporting period, Hindmarsh will consider how we can increase supplier engagement with the questionnaire process and the appropriate suppliers to issue the modern slavery questionnaire to based on their overarching inherent risk profile.

In addition to issuing questionnaires, Hindmarsh also gathers information regarding modern slavery risks in its tender processes, with the view to being identifying issues early in the procurement processes.

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## Employee Training

We continue to undertake training of all new employees to ensure that there is an ongoing awareness of Hindmarsh's expectations and requirements with respect to identifying and addressing modern slavery risks in its operations and supply chains.

The training covers 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.



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# CRITERIA 5: EFFECTIVENESS OF ACTIONS

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In each reporting period, Hindmarsh reviews its actions undertaken to assess, address and mitigate modern slavery risk to measure the effectiveness of actions undertaken and to implement any necessary changes in the following reporting period.

Our Modern Slavery Working Group reviews our due diligence process in each reporting period to ascertain if our current processes and procedures are adequately identifying, addressing and monitoring our operational and supply chain risks. A decision was made to risk screen all suppliers (both existing and new) during this reporting to ensure that Hindmarsh has oversight over the modern slavery and broader ESG pertaining to its supplier base.

The Modern Slavery Working Group will use these findings to determine further due diligence to be undertaken on high risk suppliers. Accordingly, Hindmarsh continues to be committed to reviewing and expanding its due diligence processes to gain more insight into high risk suppliers.

Additionally, we continue to monitor and review our policy framework to ensure that it reflects our processes and procedures. The rollout of our Procurement Policy during the reporting period is the most recent expansion of our policy and procedure framework to ensure that we are adequately reflecting our approach to addressing modern slavery risk in our procurement practices.

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# CRITERIA 6: CONSULTATION

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HCA and HCAQ are governed by the same Director/CEO and leadership team and the Hindmarsh policies and procedures apply uniformly across both entities, some of which are outlined in Criteria 4 above.

The Hindmarsh Modern Slavery Working Group consists of executives from both HCA and HCAQ who have contributed to the undertaking the actions described in this statement, as well as in the development of this statement. Furthermore, the same contracts apply to both entities and the same personnel review all supplier tender submissions and the risks associated with these contracts and tender submissions. This showcases a uniform approach to due diligence across both entities.

Accordingly, because there are uniform governance and due diligence processes which apply across both entities, consultation between HCA and HCAQ was extensive.



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In the next reporting period, Hindmarsh will continue to build upon the progress made during this reporting period, particularly with regard to expanding its due diligence efforts on high risk supply chains. We will continue to engage our stakeholder groups to seek opportunities for improved awareness, due diligence and cooperation amongst all parties with regard to modern slavery compliance.

Hindmarsh will look to expand the supplier base to whom we issue modern slavery questionnaires to, using the updated supplier inherent risk profiles obtained during this reporting period through the risk screening process as the foundation of targeted due diligence towards high risk suppliers.



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