



HAMILTONMARINO

MODERN SLAVERY STATEMENT



2020 / 2021

This Modern Slavery Statement (**Statement**) is made pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**) for the financial year ended 30 June 2021.

REPORTING ENTITY

This is a joint Statement made on behalf of Hamilton & Marino Holdings Pty Ltd (ACN 145 812 228) and its associated entities over which Hamilton & Marino Holdings Pty Ltd has control (as determined in accordance with the Australian Accounting Standards).

For the purposes of this statement, Hamilton & Marino Holdings Pty Ltd and its associated entities are referred to as **Hamilton Marino**.

References in this Statement to a 'year' relate to the financial year ending 30 June 2021.

At Hamilton Marino, we pride ourselves on our strong working relationships with our clients, subcontractors and suppliers, and our hands-on directors are involved in every part of the business, including our supply chain. Hamilton Marino has always been and remains committed to ensuring fair and equitable practices are upheld throughout its supply chain, and to taking proactive and effective action to identifying and avoiding or mitigating the risks of modern slavery practices occurring. However, Hamilton Marino has only recently become aware of its reporting obligations under the Act after welcoming its General Counsel as part of the team, and hence is now providing this Statement in accordance with its statutory obligations.

OUR STRUCTURE AND OPERATIONS

Established in 1975, Hamilton Marino is a privately-owned, dynamic multilevel apartment and commercial construction company.

Our value-added operational model and a reputation built on providing expertise, quality and certainty has made us an innovative industry leader.

Clients rely on us to be cost effective and our inhouse design capabilities, expertise at all stages of a project and rigorous monitoring of expenditure ensure budgets are controlled, always. We have a proud history of large-scale construction across many sectors including multi-residential developments, office construction and fit-out, retail fit-out, hospitality, warehouse and factory construction.

The company has continued to grow on the back of repeat clients, increased project size, prudent financial management and an unwavering commitment to the delivery of all our projects. Our passion, culture, reputation and integrity have attracted a highly skilled, driven team of over 150 like-minded people.

We are proud of the buildings we have contributed to the communities and cities around the country and beyond, and are excited about creating productive and inspiring places in the future.

The strength of our reputation and performance is underpinned by the commercial and administrative procedures that we follow on all projects.

We apply rigour to every aspect of our business by embracing leading technology, online programs and implementing best practice systems. Examples of which are our customised Safety Management Systems, our ASNZ Accreditation and our Design Management Systems.

Accurate up-to-date reporting is key to remaining vigilant against risks in the construction industry, such as those relating to modern slavery practices, as well as to cost control and maintaining excellence in everything we do. Document management and control systems via Aconex online are an important part of this process.

Our stringent and effective systems have been integral to Hamilton Marino enjoying 20+ years of continuous growth, regardless of economic conditions. The confidence and respect of repeat clients, organic growth of project sizes, strategic long-term planning and prudent financial planning have played an important part in our consistently strong balance sheet.

CONSULTATION WITH CONTROLLED ENTITIES

The associated entities that are part of the Hamilton Marino group carry out the same or similar operations and are largely managed by the same representatives. As such, each entity has intrinsically been consulted with and has provided input in Hamilton Marino's approach to modern slavery and the preparation of this Statement.

This consultation has extended to:

- regular discussions with key stakeholders and departments within Hamilton Marino, including directors, procurement, commercial and legal;
- receiving input and approval from these key stakeholders and departments (covering all the associated entities) in relation to the adoption of our Modern Slavery Policy and this Statement.

Once created, the membership of our modern slavery working group will include at least one organisational representative from each associated entity.

SUPPLY CHAIN

Being a design and construct builder, Hamilton Marino has a complex and diverse global supply chain. We involve international procurement as part of the delivery strategy for our projects, with our supply chain including the design, manufacture and supply of a number of products we use in our construction projects.

In the past year, Hamilton Marino has worked with hundreds of different suppliers, ranging from small privately run businesses to multinational companies.

The key trades include:

- excavation and site retention works;
- structural works, including concreting works, precast panel supply and façade-element supply;
- joinery and carpentry works;
- engineering services and works, including hydraulic, electrical, mechanical and fire;
- façade supply;
- civil and landscaping works;
- supply of plant and equipment;
- hire of constructional plant and equipment.

The key international procurement items include:

- lifts and other key plant;
- façade;
- joinery;
- precast panels.

In addition to the above, Hamilton Marino also sources goods and services for a range of ancillary and contributory providers, such as labour hire, stationary, uniforms, cleaners, personal protective equipment and the like.

Most of our suppliers are based in Australia (which is considered a low modern slavery risk country), however it is possible that they (like Hamilton Marino) rely on overseas suppliers themselves. To assess whether there are or may be modern slavery risks within our extended supply chain, we are commencing a desktop risk assessment of our suppliers and requiring them to complete a modern slavery / procurement questionnaire to better understand their operations.

Of our overseas suppliers, which are predominately based in China, we have sought to minimise the overall number of suppliers and they are generally for higher value items. These two factors assist our ability to closely monitor their operations and ensure we are working with reputable and trusted partners. We also establish and maintain strong and close working relationships with our suppliers to ensure the best practices are followed.

RISK OF MODERN SLAVERY PRACTICES

Hamilton Marino understands that there is a risk of modern slavery practices occurring in its operations and supply chain, resulting in Hamilton Marino either causing, contributing to, or being directly or indirectly involved in or linked to modern slavery practices.

While key risks include the business' use of overseas procurement, modern slavery practices are broad and extend to risks to people in all marketplaces. Such risks are complicated, evolving and at times invisible, meaning that Hamilton Marino must remain vigilant and regularly assess these risks.

ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS

Hamilton Marino is committed to engaging only those suppliers that uphold the same principles as Hamilton Marino, and where necessary, implementing corrective measures. We work closely with our subcontractors and essential suppliers to ensure an open and collaborative approach at all levels of our business.

Policies

All Hamilton Marino employees, subcontractors and suppliers are required to adhere to our Modern Slavery Policy, which sets out the minimum standards of behaviour and conduct that Hamilton Marino expects its suppliers to meet in respect of modern slavery.

This policy also sets out an obligation to report on any non-compliance with the policy and empowers Hamilton Marino to require any non-compliances to be rectified.

Tendering and engagement

As part of our tender and engagement process, all subcontractors and suppliers are required to:

- complete a pre-qualification questionnaire, which includes questions which seek to detect a supplier's risk of modern slavery practices within either their own operations or those of their supply chain;
- submit a tender which complies with all applicable laws, standards and regulations, including those relating to modern slavery;
- be engaged under Hamilton Marino's standard terms and conditions which require:
 - compliance with all applicable laws, standards and regulations, including those relating to modern slavery;
 - the subcontractor or supplier to affirm that they have no knowledge of any modern slavery practices occurring within their organisation or supply chain, that they take steps to identify any such practices and will notify Hamilton Marino if they become aware of any;
- complete a post-award questionnaire via our online safety software platform which requires them to re-affirm their compliance with modern slavery laws.

Desktop risk assessment

To further bolster this established due diligence process which we undertake for all of our subcontractors and suppliers, we are commencing a desktop risk assessment of our suppliers to better understand their operations and supply chains (including our own). This desktop risk assessment will identify those products and services in our operation and supply chain which might involve risks of modern slavery and assist us in identifying potential risk exposures. This assessment will aim to

determine the country of origin of all goods sourced by Hamilton Marino and its suppliers, and the types of those products and materials.

This assessment was not completed during the reporting year, however it is anticipated to reach completion in the next reporting period.

Strengthening contracts

As alluded to above, Hamilton Marino's agreements have been updated to include specific provisions relation to modern slavery, requiring the subcontractor or supplier to:

- comply with all modern slavery laws;
- acknowledge that they have no knowledge of any modern slavery practices occurring;
- take all reasonable steps to confirm that it is not engaging in any modern slavery practices
- notify Hamilton Marino upon becoming aware of any modern slavery practices.

Training

Hamilton Marino is commencing educational training to senior management and those overseeing procurement to improve staff awareness of modern slavery risks, and how to identify and address any concerns regarding modern slavery practices when assessing a supplier's actions and behaviour.

Remediation processes

Where Hamilton Marino identifies that there is or may be a risk of modern slavery practices, Hamilton Marino's response will include:

- gathering further information to better and more fully understand the potential modern slavery risk;
- taking steps to ensure that any potential harm caused by the modern slavery risk is avoided or, if it has occurred, mitigated and won't occur again;
- communicating the modern slavery risk with the appropriate authorities;
- taking the necessary steps to ensure that the circumstances which caused or contributed to the modern slavery risk won't occur again.

MEASURING EFFECTIVENESS

Hamilton Marino's monitors and measures the effectiveness of the actions it is taking to assess and address risks of modern slavery through both formal and informal auditing at various levels of its business. This is particularly effective at Hamilton Marino given the hands-on approach adopted by our directors, who are involved in each project through every stage of its life cycle, including procurement.

Subcontractor compliance questionnaires are required during tendering and engagement on our projects to ensure our subcontractor and suppliers maintain their awareness and vigilance against modern slavery practices. As these are required prior to start-up on every project, they are an effective tool at maintaining ongoing compliance.

As mentioned throughout this Statement, Hamilton Marino is establishing a modern slavery working group to more closely implement and monitor its actions taken, including to ensure their effectiveness in combatting modern slavery practices.

Hamilton Marino is pleased to confirm that its actions taken have been effective and that it has not identified any instances or suspected instances of modern slavery throughout the year.

THE PATH FORWARD

As noted in our introductory words to this Statement, while Hamilton Marino always been and remains committed to ensuring fair and equitable practices are upheld throughout its supply, it has only recently become aware of its reporting obligations under the Act.

As such, Hamilton Marino is in the process of implementing a number of new initiatives to progress and formalise its response to identifying and avoiding or mitigating the risks of modern slavery practices. Into the future, Hamilton Marino focus on:

- establishing our modern slavery working group to more closely implement and monitor our actions taken to address modern slavery risks;
- reviewing and updating our suite of risk-focused policies and procedures;
- monitoring compliance throughout the business with our tender and engagement processes to ensure our requirements in respect of modern slavery risks are being adhered to;
- finalising amendments to our suite of template agreements in respect of modern slavery risks;
- finalising the desktop risk assessment of our suppliers to generate a more detailed risk map;
- providing educational training to senior management and those overseeing procurement to improve staff awareness of modern slavery risk;
- continuation of our learning and consultation with industry bodies, suppliers, and other stakeholders to develop best practice approaches;
- exploring what additional steps we may take to address modern slavery risks, such as engaging third party providers such as *Informed 365* or the *Supply Chain Sustainability School*.

This Statement was approved by the board of directors of Hamilton & Marino Holdings Pty Ltd as the relevant principal governing body for Hamilton Marino in accordance with section 14 of the Act.



Matthew Green
Director
Hamilton Marino

May 2022