



Modern Slavery Statement

Company Profile

Hanlon Industries Pty Ltd, established in 2000, is a family-owned enterprise registered in Victoria, specializing in steel fabrication, labor hire, and commercial construction. The head office/corporate office is in Geelong. It consists of the 2 subsidiary entities stated in the organization structure section described further in organization structure. We are dedicated to delivering high-quality services while maintaining ethical and social standards in all aspects of our operations and supply chain.

Purpose and Commitment

Hanlon Industries is committed to combating modern slavery and human trafficking. This policy outlines our approach to identifying, mitigating, and addressing risks associated with modern slavery in compliance with the **Modern Slavery Act 2018**. We aim to foster an ethical and fair working environment across all areas of our business.

Understanding Modern Slavery

Modern slavery involves severe exploitation that deprives individuals of their freedom, including:

- Human Trafficking
- Forced Labor
- Debt Bondage
- Forced Marriage
- Child Labor

Organizational Structure

Hanlon industries are structured as privately owned with following entities being part of the parent organisation.

The organisation consists of the following.

1. Hanlon Industries Pty Ltd. (ABN: 59 144 623 969)
2. Hanlon Industries (QLD) Pty Ltd. (ABN: 77 636 430 450)

The Board of Directors sets the strategic direction and oversees the overall governance. The Executive Team, inclusive of the Managing, Executive Director, Head of Finance, General Managers and Head of System and Compliance.





Operations

Hanlon Industries has operations in Australia and New Zealand. The Australian operations are in Geelong (Victoria), Narangba (QLD), Alexandera (NSW) and Malaga (WA).

Hanlon's provision of products and services include Design, engineering, project management, metal fabrication, and building, for industries including construction, advertising, infrastructure (roads, bridge, rail, and ports) and utilities.

Since the Operations are Australia and New Zealand which are amongst lowest risk on the walk free global slavery index. There is Minimal risk in operations as Hanlon is committed to provide safe and healthy work environment for all its employees as per the governance policies in the document.

Supply Chain Overview

- **Local Sourcing:** our suppliers are Australian based, operating under robust local labour laws.

Measurable Target

To strengthen our commitment to addressing modern slavery risks, Hanlon Industries has set the following measurable target:

- By **2028**, achieve 100% compliance verification of all Tier 1 supplier through New Supplier Form and/or third-party audits, ensuring alignment with our modern slavery standards.

Interim Milestones:

- **2026:** Complete compliance verification for 50% of Tier 1 suppliers.
- **2027:** Ensure 75% of all Tier 1 suppliers have submitted New Supplier Forms or undergone third-party audits.

This target will be tracked and reported annually in our Modern Slavery Statement to assess progress and identify areas for further improvement.

These milestones are supported by a broader set of initiatives detailed in the Monitoring and Continuous Improvement section. This roadmap outlines additional actions to enhance Hanlon Industries' capacity to address modern slavery risks comprehensively, ensuring sustained progress toward our commitments.





Risk Assessment and Mitigation

Key Risks Identified:

- **Sector Risks:** Steel fabrication and raw material sourcing may involve informal labour practices in high-risk regions.
- **Geographic Risks:** International suppliers in countries with weaker regulatory frameworks.
- **Subcontractor Risks:** Limited transparency in second and third-tier suppliers.

Mitigation Framework:

- 1. Low-risk Suppliers (e.g., local suppliers):**
 - Regular review of compliance policies.
 - Spot checks during annual supplier assessments.
- 2. Medium-risk Suppliers (e.g., suppliers reliant on subcontractors):**
 - Supplier self-assessment forms.
 - Proof of compliance with ethical labour practices.
- 3. High-risk Suppliers (e.g., international sourcing):**
 - Third-party audits annually.
 - Corrective Action Plans (CAPs) to address non-compliance.
 - Capacity-building initiatives, including training programs.

Risk Management Approach

Supplier Risk Assessment

Hanlon Industries will conduct risk assessments for all suppliers classifying them as **Low, Medium, or High Risk** based on the following factors:

- Geographic location.
- Industry sector vulnerability.
- Workforce composition and policies.
- Historical incidents of modern slavery or unethical practices.





Process:

New Suppliers: Complete the *New Supplier Assessment Form* and provide:

- Ethical sourcing policies.
- Confirmation of compliance with local labour laws.
- Proof of insurances and certifications (ISO 9001, ISO 45001, etc.).

Existing Suppliers: Review of ethical and legal compliance, prioritising medium and high-risk suppliers.

Suppliers are assessed using the information and documentation they provide, with scores assigned based on a 100-point system.

Governance and Responsibilities

Governance Structure:

- **Employees:** Report concerns through established channels.
- **Managers:** Monitor departmental compliance and support reporting processes.
- **Procurement Team:** Conduct supplier risk assessments and ensure ethical sourcing.
- **Senior Management:** Review policy effectiveness and oversee corrective actions.

Related Policies:

- Whistleblower Policy
- Code of Conduct
- Anti-Bribery and Corruption Policy
- Equal Opportunity Policy
- Sustainability Policy

Consultation with Owned or Controlled Entities

Hanlon Industries has engaged with owned or controlled entities to ensure compliance with the Modern Slavery Act 2018. This includes sharing information, providing training, and collecting feedback to support the preparation of the Modern Slavery Statement.

If no such entities exist during the reporting period, this criterion does not apply.





Actions Taken

1. **Supplier Engagement:** Conducted initial and ongoing due diligence on high-risk suppliers.
2. **Training Programs:** Delivered targeted training to employees on identifying modern slavery indicators focusing on recognizing risks and reporting procedures. This includes online training, awareness emails and presentations.
3. **Reporting Mechanisms:** Established confidential channels for reporting concerns about modern slavery risks.

Monitoring and Continuous Improvement

Hanlon Industries is dedicated to fostering continuous improvement in addressing modern slavery risks through the following initiatives:

1. **Annual Reviews:** Evaluate supplier compliance, particularly high-risk suppliers, and publish findings in an annual Modern Slavery Statement.
2. **Stakeholder Engagement:**
 - Participate in sector-wide initiatives to combat systemic risks, share best practices, and promote transparency.

The following roadmap complements Hanlon Industries measurable target by outlining broader actions that strengthen our efforts to identify, address, and mitigate modern slavery risks across our operations and supply chain.

3. **Action Roadmap**
 - 2025: Expand training programs for employees and suppliers, focusing on modern slavery awareness and risk mitigation.
 - 2025: Streamline supplier onboarding processes by implementing a standardised compliance checklist to ensure new suppliers align with modern slavery standards.

Reporting and Remediation

Reporting Mechanism:

- Confidential channels are available to employees and stakeholders to report concerns.
- Reports are investigated, and findings documented.

Corrective Action Plans (CAPs):



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- Engage with suppliers to address concerns.
- Implement measures such as improving working conditions or terminating unethical subcontractors.
- Collaborate with external organisations to support affected individuals.

Assessment of the Effectiveness

- Annual senior management review of the Action plan.
- Integrating the checks with Internal Audits.

Modern Slavery Statement

Hanlon Industries will publish an annual **Modern Slavery Statement** detailing the risks identified, actions taken, and policy outcomes. This statement will be approved by senior management and made publicly accessible on Company website.

Commitment

At Hanlon Industries, we are dedicated to upholding human rights and eliminating exploitation in all its forms. Through our comprehensive policy and ongoing improvements, we aim to contribute to a responsible and sustainable future.

Current review Outcome

We confirm that we are unaware of any cases of modern slavery within Hanlon Industries or our supply chains.

Approval

This statement has been prepared in compliance with Section 16 of the Modern Slavery Act 2018 and has been approved by Hanlon Industries Pty. Ltd Board of Directors to address the risks of modern slavery and human trafficking within its business operations and supply chain.

A handwritten signature in black ink, appearing to read "P. Hanlon".

*P. Hanlon
Managing Director
Hanlon Industries
20th October, 2025*

