

# Modern Slavery Statement

Financial Year 2024 - 2025



## **03. Introduction**

## **04. Our company**

Describe the reporting entity's structure, operations and supply chains

## **06. Supply chain risks**

Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

## **07. Actions**

Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

## **08. Assessment**

Describe how the reporting entity assesses the effectiveness of these actions

## **09. Consultation**

Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)



# / Introduction /

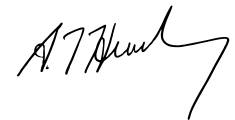
At HT1 Group, we remain steadfast in our commitment to conducting business with honesty, fairness, and transparency, principles that underpin our ability to create a positive impact on our community and the construction industry.

Modern slavery, in all its forms, is incompatible with our values and has no place within our operations, supply chains, or business partnerships.

During FY24/25, we continued to strengthen our approach to identifying and addressing modern slavery risks, building on the foundations of previous years. This year saw the introduction of the iPRO Modern Slavery Assessment Tool, replacing Informed365, enabling us to gain more detailed visibility of our suppliers and their practices.

Through this enhanced platform, we have deepened our understanding of high-risk sectors and regions, expanded supplier participation, and begun implementing supplier follow-up initiatives to ensure continuous improvement.

As outlined in this Statement, we reaffirm our commitment to ongoing transparency and collaboration across our business and supply chain – recognising our responsibility to play an active role in eradicating modern slavery.



Andrew Headberry  
Managing Director

# / Our company /

## Business structure

**This statement is for HT1 Pty Ltd and its related entities Harris HMC Interiors Pty Ltd, Harris HMC Interiors (VIC) Pty Ltd, Harris HMC Construction Pty Ltd, HDP (VIC) Pty Ltd, UBOS Australia Pty Ltd, HMC Div 6 Pty Ltd, and Harris HMC Construction (VIC Major) Pty Ltd.**

HT1 Group is an integrated construction and services organisation operating across the commercial, education, residential, government, and health sectors. Our operations include:

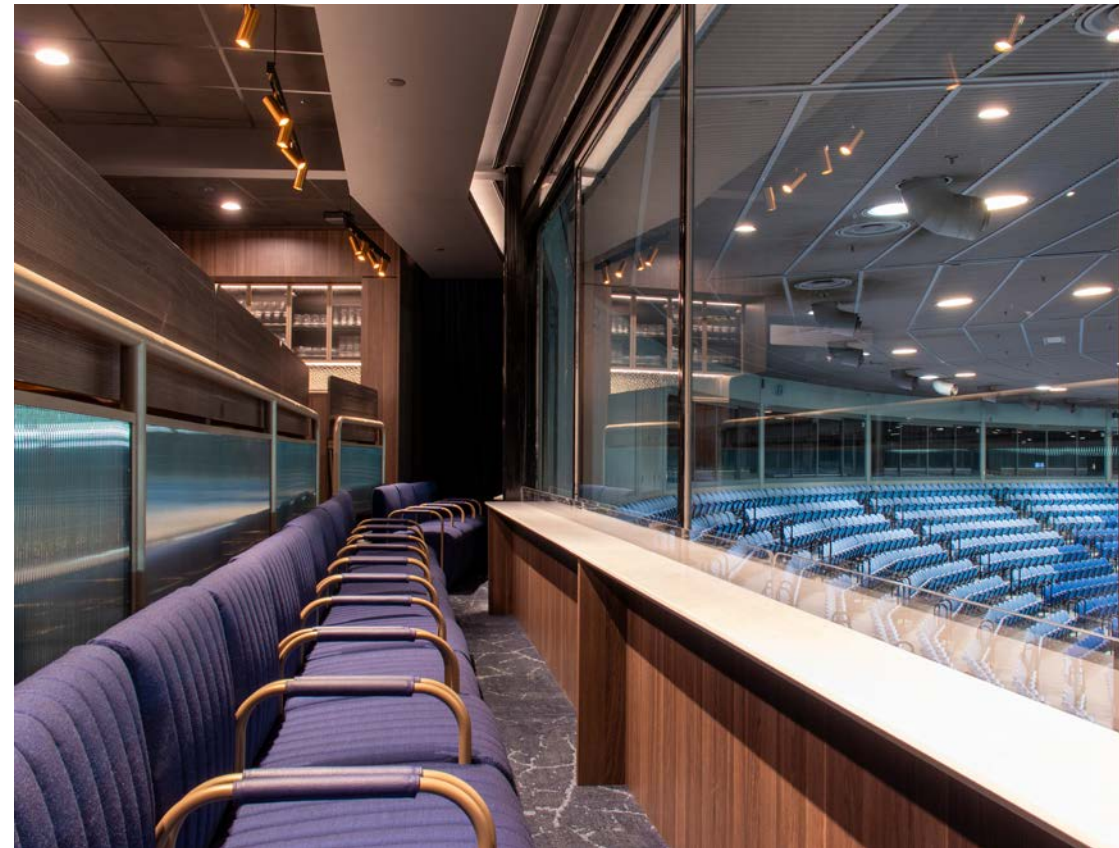
- Construction solutions
- Fit-out and refurbishment projects
- Programmed and reactive maintenance services
- Programmed and reactive electrical services

The HT1 Group business address is 52 Henderson Street, North Melbourne VIC 3051, and we employ approximately 230 people under permanent, fixed-term, part-time, and casual contracts.

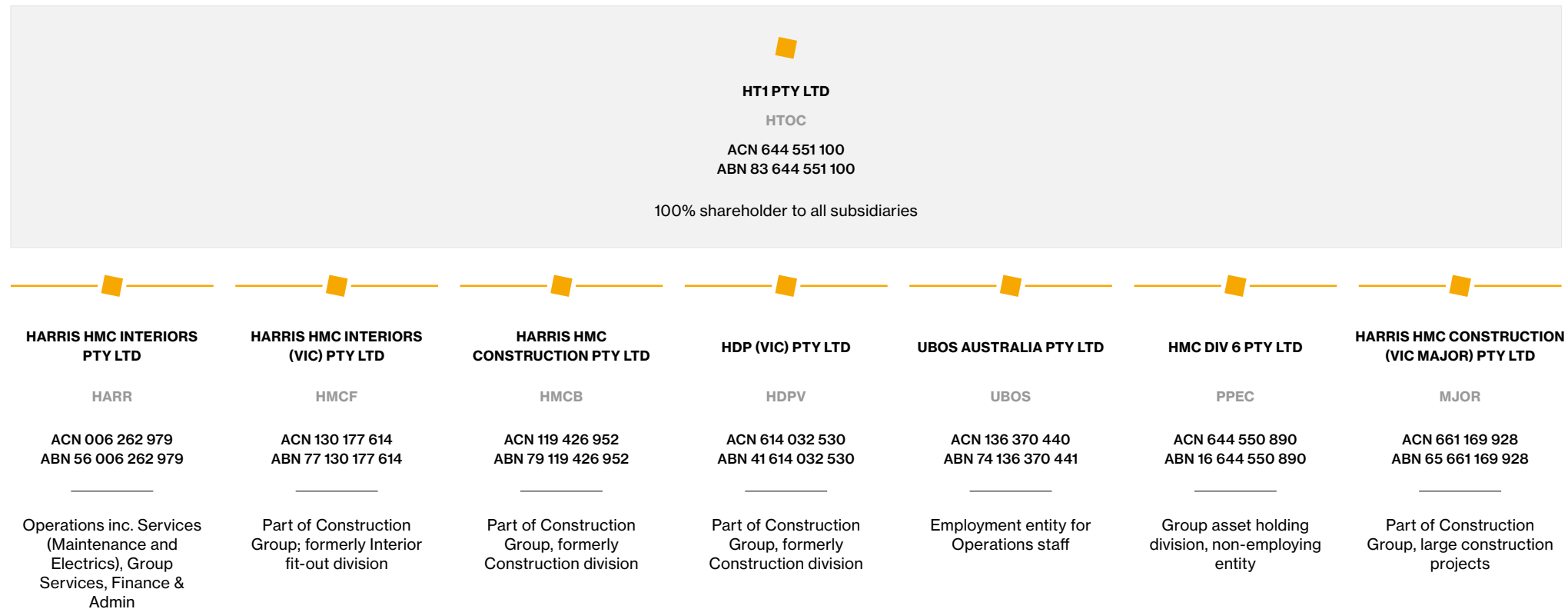
This Statement applies across all HT1 Group entities and reflects our collective approach to assessing and addressing modern slavery risks.

## Reporting period

This Statement covers the financial year 1 July 2024 – 30 June 2025, in accordance with the Modern Slavery Act 2018 (Cth).



# Group Structure and Key Activities



# / Supply chain risks /

## HT1's operations

HT1 Group's directly employed workforce is majority-based in Australia, with a small portion of our workforce contracted in the Philippines. All employees and contractors are engaged under workplace agreements, relevant industry awards, or individual contracts. As such, the risk of modern slavery practices within our direct operations remains low.

However, we recognise that construction projects often rely on complex and multi-tiered supply chains. These structures can create potential vulnerabilities to modern slavery, particularly through the procurement of raw materials, subcontracting arrangements, and the use of imported goods.

## Suppliers

Our suppliers operate in diverse sectors, including accommodation and food services, administration, agriculture, building and cleaning services, construction, education, energy, finance, government, healthcare, labour hire, manufacturing, professional services, retail, security, transport, and waste management.

Suppliers operate both domestically and internationally, including in Australia, Brazil, Canada, China, New Zealand, Singapore, and the United States.

Based on our iPRO assessment data, high-risk sectors for our suppliers include construction, manufacturing, labour hire, cleaning, and building services.

Certain goods sourced from specific regions present higher risks, such as:

- China: Aluminium and electronics
- Malaysia: Electronics
- Pakistan: Electronics
- Vietnam: Furniture

These risks reflect broader global concerns about forced labour, child labour, and debt bondage in manufacturing and raw material extraction industries.

## Key risk

85% of our assessed suppliers had operations in one or more of the sectors identified as ones of forced labour exploitation:

- 69 suppliers had operations in 1 high-risk sector
- 27 suppliers had operations in 2 high-risk sectors
- 4 suppliers had operations in 3 high-risk sectors
- 11 suppliers had operations in other sectors not deemed to be high-risk

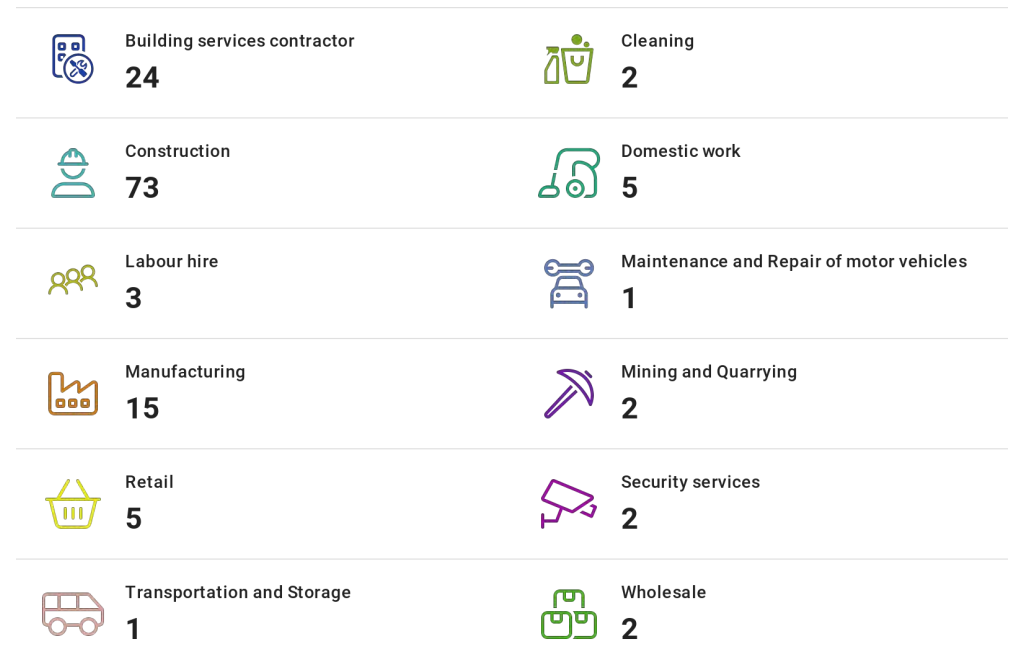


Diagram: Suppliers High Risk Sectors

# / Actions /

## Assessing risks

In FY24/25, HT1 Group engaged iPRO to assess and monitor modern slavery risks across our supplier base.

A total of **265 suppliers** were invited to participate in the assessment, with **117 completions (44.2%)**.

Each supplier completed a self-assessment questionnaire, allowing iPRO to calculate:

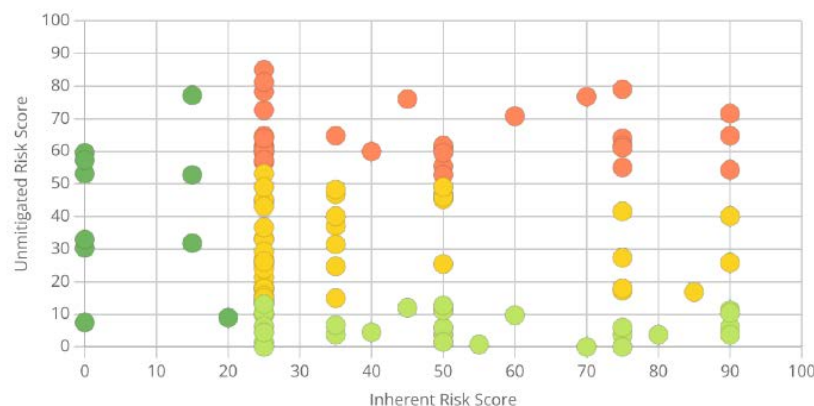
- **Inherent Risk Score:** The level of risk based on geography, sector, and type of goods or services.
- **Unmitigated Risk Score:** The remaining level of risk after accounting for policies and controls.

## Aggregated results (FY24/25)

- **Inherent Risk Score:** 41.54 / 100
- **Unmitigated Risk Score:** 36.71 / 100

These results provide a clear baseline for future benchmarking and targeted risk mitigation.

Risk categories	% of suppliers per risk category	# of suppliers per risk category
Low-Risk (No inherent risk)	8.5%	10
Low-Risk (Adequate risk control)	23.1%	27
Medium-Risk (Partial risk control)	36.8%	43
High-Risk (Inadequate risk control)	31.6%	37
High-Risk (High levels of inherent risk)	0%	0



The scatter chart above compares all assessed suppliers according to both their unmitigated risk and inherent risk scores.

## Addressing risks

Following the assessment, iPRO issued action items for suppliers to strengthen their risk controls, focusing on areas such as policy development, workforce management, and ethical sourcing.

In addition to our iPRO partnership, we have continued to:

- Maintain and enforce our **Code of Conduct**, which sets ethical expectations for all employees and suppliers.
- Operate a **Speak-Up Channel**, allowing staff and contractors to report concerns anonymously.
- Apply our **Modern Slavery Policy**, **Grievance Policy**, and **Whistleblower Policy** to safeguard integrity and transparency.
- Include **modern slavery training** as a mandatory onboarding requirement for all new employees, with refresher courses delivered annually.

Our **Learning Management System (LMS)** continues to serve as the platform for compliance training, tracking participation and engagement across the organisation.

# / Assessment of effectiveness /

We use benchmarking and KPIs within the iPRO Modern Slavery Assessment Tool to evaluate the effectiveness of our actions. Through this process, we are able to measure progress and identify areas for further improvement. Our goal is to reduce Unmitigated Risk Scores over time by strengthening supplier controls and increasing transparency.

## Key metrics

Supplier participation rate in assessments

Aggregated risk scores (inherent and unmitigated)

Supplier improvement through completion of follow-up actions

Employee training completion rates



# / Consultation /

This Modern Slavery Statement was approved and signed by the Board of Directors of HT1 Pty Ltd on 20 December 2025, in accordance with section 13 of the Modern Slavery Act 2018 (Cth).

It was developed collaboratively across the HT1 Group, involving consultation between the Finance, People & Culture, and Operations teams.

The process included:

- Reviewing group-wide risk assessments
- Aligning policy frameworks across entities
- Consolidating supplier data from iPRO
- Drafting and approving this Statement



Dale Kennedy  
Director

20 Dec 2025



Andrew Headberry  
Managing Director

20 Dec 2025



Arthur Kennedy  
Non-Executive Director

20 Dec 2025



Geoff Dart  
Non-Executive Director

20 Dec 2025



---

Modern Slavery Statement 2025

***HARRIS HMC***

HT1 Group

52 Henderson Street  
North Melbourne VIC 3051

03 9328 8900  
[enquiries@harrishmc.com.au](mailto:enquiries@harrishmc.com.au)

[harrishmc.com.au](http://harrishmc.com.au)