

HART INTERNATIONAL AUSTRALIA PTY LTD

MODERN SLAVERY STATEMENT



2023-2024



HART

MESSAGE FROM THE CEO

Hart International Australia's organisational ethos, our vision, and our principles are fundamental in guiding our actions, fostering our personnel, and ensuring our commercial sustainability. They serve as the cornerstone of our endeavours.

These principles dictate not only our approach to work, but also how we engage with others.

Rooted in integrity, reliability, compassion, safety, teamwork, and innovation, they form the bedrock of our operational practices and relationships with clients and suppliers.

This statement on modern slavery builds upon these foundational elements, outlining the strides we've made toward achieving our goals.

We anticipate always taking this endeavour forward, despite the, sometimes, challenging environments in which we operate. We want to make a difference.

Sally Stone

THE REPORTING ENTITY

Hart International Australia Pty Ltd is the sole reporting entity covered by this statement. The statement period is July 1 2023 - June 30 2024.

Hart International Australia has no subsidiaries and we do not report to any other entities.

Hart International Australia is an Australian owned and operated small business. Our head office is in Sydney and our staff provide services both in Australia and internationally.

This statement was approved by the board of Hart International Australia Pty Ltd on 30 June 2024 and submitted by Director and CEO Sally Stone.

Sally Stone



WHEN YOU FACE RISK, YOU NEED HART

2

STRUCTURE, OPERATIONS & SUPPLY CHAINS

Hart International Australia is a Pty Ltd company incorporated in Australia. We are a small business employing less than 15 people.

We have three interconnected business units – **Training, Consultancy and Operations.**

We operate domestically and internationally, primarily in austere, challenging, or hazardous environments. Our personnel are directly employed or contracted by us.

SUPPLY CHAIN

Hart is a business whose primary service provision is our personnel, and as such our supply chain is extremely small.

Hart has roughly 17 suppliers to support us carrying out our operations. Hart has mapped our supply chain, identifying key suppliers. 90% of our suppliers are Australian based.

In 2022-2023 our contracts with suppliers covered fundamental areas such as professional services (external auditors, IT support, legal, tax), small product purchases and external training venues..

To mitigate the risk of modern slavery we require these suppliers to comply with our due diligence procedure, our responsible procurement standards, and the provisions of the Modern Slavery Act.

We have an audit process in place to assess any new suppliers.

RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS

Hart International Australia give's consideration to our potential to cause, contribute or be directly linked to modern slavery eat year with a company-wide Human Rights Risk Assessment (HRRRA). We then address our offshore operations on a project-by-project basis.

Our annual HRRRA analyses our supply chain, our recruitment process, and geographical operating locations to identify modern slavery risks and we consider and implement appropriate mitigation measures.

Our business model does not involve manufacturing, production, or the use of physical products, which significantly minimises our exposure to risks associated with modern slavery. Given the nature of our operations, the likelihood of causing, being linked to, or contributing to modern slavery is extremely low. Nonetheless, we remain vigilant and proactive in ensuring that our practices and those of our partners align with our values of integrity and respect for human rights.

Because of the business model it is an extremely low risk that we could be the **CAUSE** of modern slavery. Because we have a small, vetted supply chain the chance we could **CONTRIBUTE** to modern slavery is also deemed low.

Because we operate in some locations with a higher risk of modern slavery -due to poor governance, weak rule of law, conflict and socio economic factors- we see the chance of (indirectly) **BEING LINKED** to modern slavery as possible. This is why we conduct a Human Rights Risk Assessment prior to our offshore operations. We also ensure any personnel recruited to work with us do so directly and not through third parties.

4

RISK MITIGATION ACTIONS & REMEDIATION

Polices & Procedures

At Hart our policies and procedures recognise Modern Slavery as a crime and a violation of fundamental human rights, depriving people of their liberty and exploitation for personal or commercial gain.

Our stance on Modern Slavery is recognised within our policies on Human Rights. Those policies commit to conducting our business ethically, and with integrity, taking a zero tolerance approach to modern slavery. This ethical approach is at the heart of what we do, and we assess and address the risk of modern slavery and human trafficking within our supply chain and our own endeavours, implementing and enforcing effective procedures and controls.

We also expect the companies and organisations with whom we do business to adopt and enforce policies which comply with anti-modern slavery and anti-human trafficking legislation.

Our Human Rights policy is reinforced by other internal policies and procedures; Code of Conduct, Whistleblowing Procedure and our Due Diligence Procedure which reflects the requirements of the Modern Slavery Act.

Recruitment Procedures

HART has rigorous recruitment procedures which are in line with Australian employment laws. All employment contracts are drawn up by an recognised law firm and meet all employment legislation.

Hart personnel must go through an onboarding process which includes:

- Training on Modern Slavery, PSEAH and diversity.
- Hart's Code of Conduct and ethical standards. Personnel must sign a commitment to uphold these Codes when onboarding.
- Australian Government's online e-learning module on modern slavery.
- When recruiting personnel for short term tasks off shore we always offer market-competitive pay and comply with any applicable wage minimum requirements for another country.

Supply Chain Procedures

We require suppliers to acknowledge and agree to HART's Supplier Code of Conduct.

We require suppliers to commit to ensuring compliance with the Modern Slavery Act 2018.

We ensure that all contracts with suppliers (even those which do not contract on Hart's standard terms) contain appropriate provisions requiring all suppliers to adhere to our values in respect of modern slavery and the requirements set out above.

We recognise our exposure can be higher when working in conflict affected territories and we take additional care to assess and document the Human Rights environment.

If a case of modern slavery is uncovered at any time during our procurement process, we refer to the Modern Slavery Response Protocol which steps out how to appropriately respond to and report suspected cases.

Remediation

If one of our suppliers ceases to comply with our Modern Slavery commitments, or if during the due diligence process a potential supplier is non-compliant Hart implements a six-step non-compliance process.

NON-COMPLIANCE PROCESS



ASSESSING EFFECTIVENESS

Hart assesses the effectiveness of our modern slavery mitigation strategies through a comprehensive process that includes setting clear objectives and KPIs, conducting regular supplier audits, and providing training for employees and identifying that suppliers are aware of our requirements.

We have established accessible grievance mechanisms and conduct Human Rights impact assessments to evaluate the broader effects of our initiatives.

Continuous improvement is a key focus, with annual policy reviews and benchmarking against industry standards. We are committed to transparency and voluntarily report on our progress.

Hart is a company that does not rely heavily on suppliers so the effectiveness of our existing measures has to date been excellent.

There have been some suppliers who have not caught up with the implementation of the Modern Slavery Act 2018 but they have been willing to sign a commitment to comply with Hart's policies and procedures to combat Modern Slavery.

We will continue to monitor the actions we implement in 2024-2025 and always look for opportunities for improvement and effectiveness.

CONSULTATION

Hart Australia does not report to any entities and we do not have any entities report to us - so consultation is not required in that respect.

However, Hart do consult with and seek guidance from external support agencies who deal with Modern Slavery in Australia.

Hart have identified the following organisations we can bring in to support us in a non-compliance process and to ultimately step in to mitigate and prevent future harm to any workers.

<p>AUSTRALIAN FEDERAL POLICE Hotline: 131 237 Online form: forms.afp.gov.au/online_forms/human_trafficking_form Website: afp.gov.au/what-we-do/crime-types/human-trafficking</p>	<p>SALVATION ARMY Phone: 1300 473 560 Email: endslavery@salvationarmy.org.au Website: salvationarmy.org.au/about-us/our-services/fighting-modern-slavery-exploitation/</p>
<p>SUPPORT AGENCIES</p>	
<p>RED CROSS Phone: +61 03 9345 1800 Email: national_stpp@redcross.org.au Website: redcross.org.au/get-help/help-for-migrants-in-transition/trafficked-people</p>	<p>ANTI-SLAVERY AUSTRALIA Phone: 02 9514 8115 Email: antislavery@uts.edu.au Email (Legal): ASALegal@uts.edu.au Website: antislavery.org.au/</p>

OTHER RELEVANT INFORMATION

Future Goals

Recognising that modern slavery is an on-going threat, we are committed to continuous improvement of our practices to combat slavery and human trafficking.

We are confident with our local procurement and our supplier compliance, but we want to continue to look at ways we can increase our vigilance against Modern Slavery in austere and challenging environments globally. To do this we will network with similar organisations globally to share ideas.

In the coming year we will also look to increase awareness with our own personnel through training and workshops.

We will also start to revisit existing suppliers annually to ensure there have not been any negative developments.

Thank you!