



## Modern Slavery Statement 2020

### Hindmarsh Construction Australia Pty Ltd and HCA Queensland Pty Ltd

#### 1. Introduction

Hindmarsh Construction Australia Pty Ltd (**HCA**) ACN 126 578 176 and its wholly owned subsidiary, HCA Queensland Pty Ltd ACN 629 849 814 (**HCAQ**) are making this statement in accordance with section 14 of the *Modern Slavery Act 2018* (Cth) (**Act**). We wish to outline our approach to ensure that we have the processes in place in order to minimise the risks of modern slavery in our business operations and supply chains. We acknowledge that slavery can occur in many forms as detailed in the Act and is committed to operating responsibly and identifying and working with its supply chains to eradicate the various forms of slavery.

#### 2. Our structure, operations and business

HCA is a construction company incorporated in Australia with its headquarters in Canberra, ACT. It operates in the ACT, NSW and South Australia and its wholly owned subsidiary HCAQ operates in Queensland. Together, HCA and HCAQ have over 180 employees and have a combined turnover in excess of \$400 million. Both entities have a common director and share corporate functions, policies and procedures.

HCA and HCAQ are part of the Hindmarsh Group that operates in various sectors including construction projects across multiple segments such as education, health, infrastructure and accommodation and also property developments, retirement services and funds management.

#### 3. Risk identification

We are the process of undertaking a review of the possible risk of modern slavery practices across our business operations and supply chains. The supply chains include the procurement of subcontractors and consultants and also materials and manufactured products from various suppliers.

We understand that the risks relating to subcontractors, consultants and suppliers will vary according to their industry, location and company size. We aim to do business with subcontractors, consultants and suppliers that have similar values, ethics and business practices (including those in relation to human rights).

As risks are identified, these will be dealt with in line with the objectives of this document.



#### 4. Risk management and due diligence

In order to address the risks of modern slavery in our supply chains, we have undertaken or will undertake the following measures:

- inclusion in subcontract agreements of a requirement for the subcontractor to comply with Modern Slavery legislation;
- investigating an ongoing monitoring process of identified subcontractors, consultants and suppliers;
- implementing an anti-modern slavery policy;
- updating the subcontractor's induction form with relevant questions to enable an initial risk assessment; and
- introducing an internal training program as part of the employee induction to educate employees on the impacts and risks of modern slavery.

#### 5. Ongoing assessment of risk

We will continue to work with parties throughout its supply chains to prevent any contribution that Hindmarsh may have to the issue of modern slavery. We will achieve this by raising awareness of the forms of modern slavery among our employees, subcontractors, consultants and suppliers and continuing to improve our due diligence processes to assist in the identification of risks.

Approved by the boards of Hindmarsh Construction Australia Pty Ltd and its subsidiary HCA Queensland Pty Ltd.

John Hindmarsh

Director

Dated: 21 December 2020