

MODERN SLAVERY STATEMENT 2022

THE HARRIS HMC GROUP

CLUB RATHDOWNE

IMAGE: CLUB RATHDOWNE

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Introduction

Our second Modern Slavery Statement (The Modern Slavery Act 2018 (Cth) (Act)) builds on the foundations of our prior efforts to evaluate and address the hazards of modern slavery in our industry. It outlines our existing initiatives and crucial next steps as we work to comprehend and eradicate modern slavery from our supply chain and operations.

Over the last twelve months we have worked on building our understanding and capabilities, improving our policies and processes and enhancing engagement with our suppliers. In addition, we have continued delivering on our plan to better understand and mitigate modern slavery risks by working more closely with our suppliers and industry partners.

We are implementing controls for managing existing and emerging issues and risks, developing industry responses, and are seeking guidance from independent experts. Our assessments to date have not identified any known modern slavery practices in our operations or supply chain. However, we recognise that, in some circumstances, this is challenging to uncover.

We remain focused on delivery against these frameworks, prioritising strategic work in risk areas and remediating negative impacts where these are identified. In the interest of current and future workers, the most enduring impact we can have is when we continue engaging with the supplier to not only remediate impacted workers but lift standards through enhanced policies and procedures.

I am proud of the work that has been achieved so far by our team. By safeguarding our employees, customers, suppliers, and clients, we can ensure everyone is protected and respected at work. We have the right governance structures in place to respond to the challenges posed by modern slavery and will continue to report transparently on our progress.



Dale Kennedy
Managing Director

Our company

Business structure

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

An integrated construction and services group, spanning a breadth of industry sectors, each with similar supply chains:

- Construction solutions across education, commercial, residential, government, health, aged care and industrial sectors.
- Fit-out and refurbishment projects for Education, Government, Health and Commercial clients.
- Programmed and reactive commercial maintenance services to local councils, public companies and public spaces.
- Programmed and reactive electrical services across Melbourne.

The Harris HMC Group business address is 52 Henderson Street, North Melbourne VIC 3051. We employ 287 staff under permanent, fixed term, part time and casual contracts, or under enterprise agreements.

All items outlined within this Statement are applicable across all entities; from the initial risk-scoping exercise conducted with the assistance of external partners, to the Supply Chain Assessment and subsequent risk-reduction policies and procedures.

Reporting period

The Harris HMC Group operated on the 2021/2022 financial year reporting period in accordance with the Act.

Business structure overview diagram

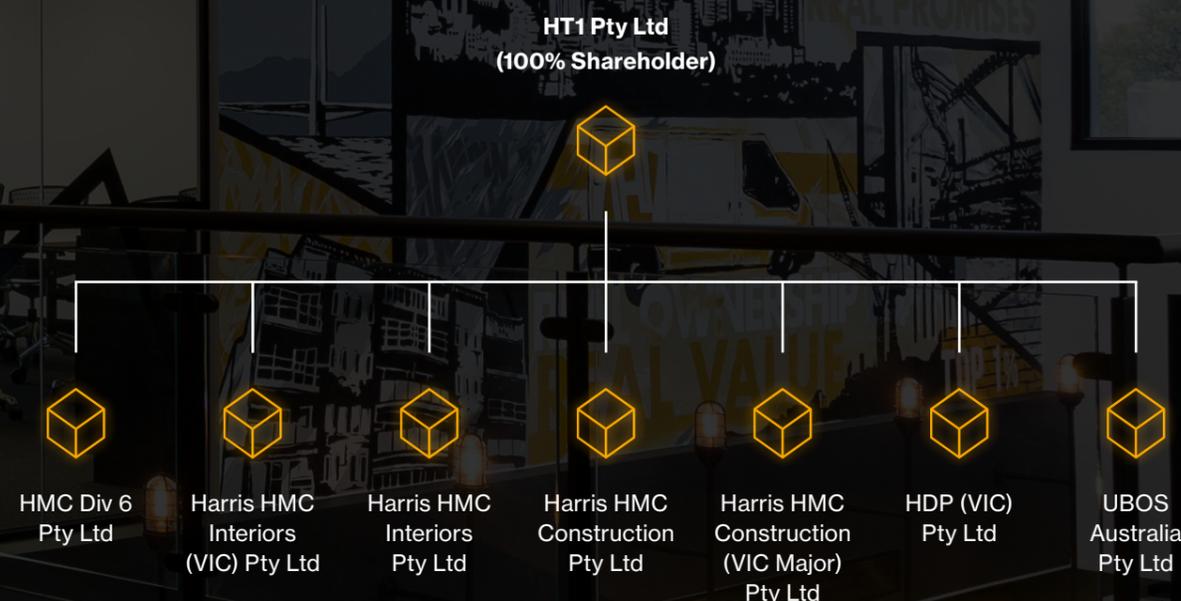


Figure 1 (above): The Harris HMC Groups's business structure, as relevant to this Modern Slavery Statement. With the relevant functions shared between them, this Statement covers Harris HMC Interiors Pty Ltd, Harris HMC Interiors (VIC) Pty Ltd, Harris HMC Construction Pty Ltd, Harris HMC Construction (VIC Major) Pty Ltd, HDP (VIC) Pty Ltd, HMC Div 6 Pty Ltd, UBOS Australia Pty Ltd.

Entity	ACN	ABN
HT1 Pty Ltd (100% Shareholder)	644 551 100	83 644 551 100
HMC Div 6 Pty Ltd	644 550 890	16 644 550 890
Harris HMC Interiors (VIC) Pty Ltd	130 177 614	77 130 177 614
Harris HMC Interiors Pty Ltd	006 262 979	56 006 262 979
Harris HMC Construction Pty Ltd	119 426 952	79 119 426 952
Harris HMC Construction (VIC Major) Pty Ltd	661 169 928	65 661 169 928
HDP (VIC) Pty Ltd	614 032 530	41 614 032 530
UBOS Australia Pty Ltd	136 370 440	74 136 370 440

Identifying and taking action to address modern slavery risks

HT1's operations

The Harris HMC Group considers that we have a low risk of modern slavery in the employment of our employees given the entirety of our direct workforce is located in Australia which has one of the lowest modern slavery, estimated prevalence scores globally.

A high majority of our employees are permanent staff with only a small percentage (around 4%) of individuals being employed on a casual basis or from an Australian based labour hire service. All employees have employment terms and conditions set out in an employment contract, with regular performance reviews and interactions with management.

A key aspect to ensuring that our employees can identify, report and help prevent modern slavery is building awareness through training. In the previous reporting period, Harris HMC rolled out its compulsory online training module to all employees. This training is also issued to all new employees as part of their mandatory onboarding requirements, including during the reporting period.

Suppliers

The Harris HMC Group considers the risk of exposure to modern slavery practices in our supply chain is greater than in our own operations. The activities that we have undertaken to date seek to obtain a greater understanding of these potential exposures.

Our supply chain remains substantially similar to the previous reporting period, although our understanding of our supply chain is improving.

The majority of Harris HMC's first tier suppliers remain located in Australia. Harris HMC supply chains include the manufacture and transportation of the material we use in construction, including but not limited to bricks, windows, joinery, fixtures and fitting. In this context, Harris HMC's supply chains include the overseas factories where these items might be manufactured. Harris HMC's supply chains also includes services that contribute to its operations, such as the cleaning and security companies that service Harris HMC's offices and building sites.

In 2021, The Harris HMC Group completed an initial modern slavery assessment of our major suppliers, ranking them by spend. These priority subcontractors and suppliers were then invited to participate in Modern Slavery Assessment, enabling The Harris HMC Group to collect additional information on their approach to managing modern slavery risk.

Actions undertaken in the last 12 months

Training

Assessed and implemented a purpose driven online modern slavery training module with specific emphasis on the construction industry.

Awareness

Provided modern slavery awareness training for The Harris HMC Group employees.

Affiliations

Joined the Property Council Australia Modern Slavery Assessment consortium to ensure more of our subcontractors and suppliers will be surveyed annually and enable the sharing of data across the industry.

Recruitment

Where possible The Harris HMC Group is hiring staff directly to reduce the risk associated with Labour Hire companies.

The Harris HMC Group has contacted all recruitment and labour hire agencies who we engage with and request they commit to the following prior to undertaking any further services:

- No fees are paid to them by workers you place within our organisation
- The organisation is certified under the Labour Hire Licensing Bill 2017

Contracts

Have contracts of employment or engagement in place with workers and ensure copies of the workers contracts are readily available.

How will we assess the effectiveness of our actions

We are still in the process of developing and maturing the way in which we assess the effectiveness of our actions in response to risks which cause, contribute, or are directly linked to modern slavery. Many of the actions which we have taken to date, or are planning to take over the next 12 months, are part of the development of our framework for the management of modern slavery risks. As this framework matures and develops we will continue to improve and enhance our response accordingly.

Impact of COVID-19

In 2021, the COVID-19 pandemic has applied significant pressure to the business, our people and our supply chain. Throughout the pandemic, we have been proactive in ensuring all State and Federal guidelines are implemented and followed with the safety of our people, subcontractors and project sites a priority. We are aware that COVID-19 further increases the risk factors linked to Modern Slavery within our supply chain and we will continue to take this into consideration when assessing the risk of modern slavery within operations.

Mitigation and remediating risks associated with modern slavery

Committed to continuous improvement, The Harris HMC Group's modern slavery path will consist of the following planned actions that will be reported against in subsequent statements:

- Undertake an annual purpose driven online modern slavery training module completed by all employees across The Harris HMC Group with specific emphasis on the construction industry. We will continue to track and review the number of staff completing modern slavery training, ensuring all new starters complete this training.
- Review, update and implement Modern Slavery Policy and draft associated policies likely to incorporate Supplier Code of Conduct, Procurement Policy and Human Rights Policy.
- Review and keep track of all suppliers and subcontractors who have subscribed to the Property Council of Australia pre-qualification portal.
- Complete a Modern Slavery Assessment prior to onboarding new suppliers and subcontractors with the support of Property Council Australia Modern Slavery Assessment consortium.

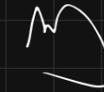
Consultation and approval

This report was produced in consultation with our Finance and People & Culture Departments. This statement was approved by the board of HT1 Pty Ltd in their capacity as principal governing body of HT1 Pty Ltd on 20 December 2022.



Dale Kennedy
Managing Director

20 December 2022



Arthur Kennedy
Director

20 December 2022



Andrew Headberry
Director

20 December 2022



Geoff Dart
Director

20 December 2022



The Harris HMC Group

52 Henderson Street
North Melbourne VIC 3051

P +61 3 9328 8900

E enquiries@harrishmc.com.au