

Financial Year 2024

Hall Group Modern Slavery Statement



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About this Statement

Our Modern Slavery Statement is published in accordance with the Modern Slavery Act 2018 (Act). This Statement encompasses the consolidation of Hall Holdco Pty Limited and its controlled entities. It acts as the policy framework including governance, risk assessment, due diligence and remediation for all Hall Group entities and their business activities.

In preparing this Statement, we actively engaged and consulted with all the relevant business units and entities which form part of the broader Hall Group. This was undertaken through the Hall Modern Slavery Working Group (Working Group) collaborating with the business units and entities to provide an overview of the Modern Slavery Act 2018's reporting requirements and providing information regarding the actions we intend to take to address these requirements.

This statement has been prepared by Hall Modern Slavery Working Group and endorsed by the Hall Board.

Background & Reporting Entity

Hall Group (Hall) has been in operation for more than 78 years and employ over 300 employees with offices in Australia, Fiji and Malaysia. Hall have grown from a third-generation family run business and are considered market leaders in Australia.

As one of Australia's top-tier dredging and marine civil contractors, Hall deliver large-scale works for ports, major marine facilities, canal and other marine developments across Australia, the Pacific Islands and South East Asia.

Hall Civil division delivers a range of services including infrastructure works and urban development services for private companies and government corporations, including developers and local councils across South East Queensland.

Marine civil services in Australia and the Pacific include capacity building strategies through climate change adaptation projects to improve coastal resilience and reduce vulnerability to the effects of climate change. Hall have successfully built seawalls, jetties, wharves, boat ramps, carried out land reclamation works and undertaken flood mitigation dredging.

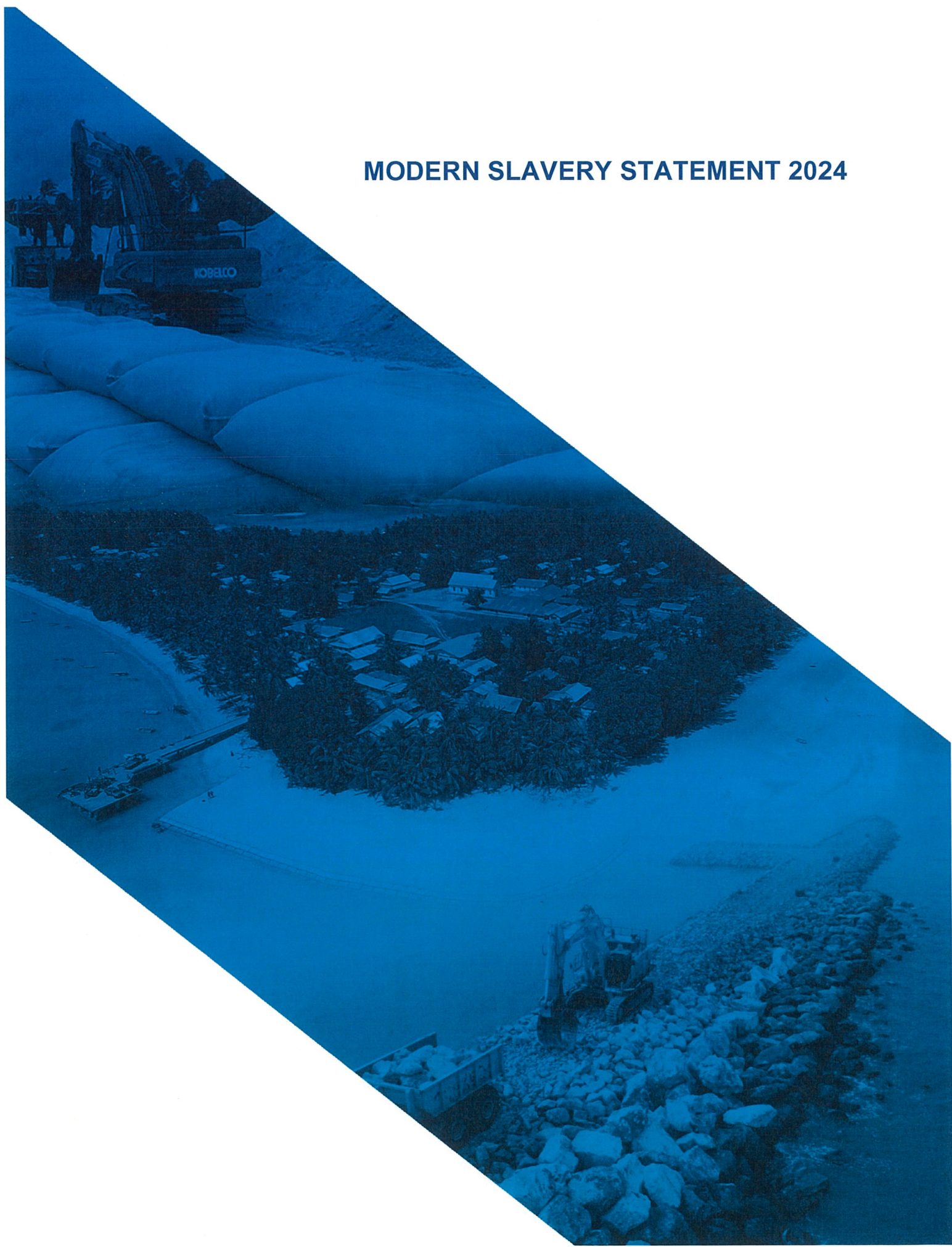
Hall operates a Tailings and Waters management services division that provides niche capabilities to the Australian mining and heavy industries sector. Services include water pumping, hydro-mining, slurry pumping, desilting, and Amphibious dredge solutions.

The Hall Group respects the human rights of every person involved in its operations, supply chain and the communities in which it operates. Hall undertake due diligence activities to identify, prevent and mitigate adverse human rights impacts on operations. Hall do not accept any form of modern slavery in the conduct of its operations and in its supply chains and are committed to ensuring that all workers are treated fairly, ethically and with respect.

The parent company of the Hall Group is Hall Holdco Pty Ltd which is the Reporting Entity for this statement. As parent company, Hall Holdco Pty Ltd Board of Directors are authorised and responsible for lodging the Groups Modern Slavery Statement and consults with all subsidiaries in the detection process of assessing operational and supply chain exposures.



MODERN SLAVERY STATEMENT 2024



Structure, Operations, and supply chain

Entity	Structure	Operations	Supply Chain
Hall HoldCo Pty Ltd (Parent Entity) (ACN 623 029 005)	Holding company	National group of companies engaged in Dredging, Water & Tailings Solutions, Civil Infrastructure, Urban Development and Marine Civil Services for private and government clients across Asia, Australia and the Pacific.	The procurement of suppliers and materials is common across all of Hall businesses.
Hall BidCo Pty Ltd (ACN 623 029 292)	Non-operating Australian Company	None	Hall has a diverse supply chain that supports the multiple divisions in the Group; although all acting in accordance with the Hall values and vision. Our procurement spend is predominately from direct Australian Suppliers.
Hall Contracting Pty Ltd (ACN 009 786 065)	Australian Company	Hall Australian operating entity providing Dredging, Water & Tailing Solutions, Civil and Marine Civil services.	
Hall Plant Hire Pty Ltd (ACN 110 517 210)	Australian Company	Hall Equipment hire business. Hiring of equipment to the Hall Group of operating entities.	
Hall Civil Contracting Pty Ltd (ACN 162 052 959)	Non-operating Australian Company	Engaged in select Civil Operations in South East Queensland.	The supply chain includes the provision of construction materials and equipment, dredging parts and materials, fuels, corporate and professional services, labour services, PP&E and security services.
Hall Civil Engineering Pty Ltd (ACN 602 726 410)	Non-operating Australian Company	Engaged in select Dredging Operations in Australian, South East Asia and the Pacific.	
Hall CharterCo Pty Ltd (ACN 629 827 685)	Australian Company	Hall Equipment hire business. Hiring equipment to the Hall Group of operating entities.	
Hall Plant Hire Pacific Pty Ltd (Co# ICA11983/2015)	Cook Islands Company	Hall Tug operations in the Pacific Islands	Hall seeks to procure suppliers that share Hall values and ethics in relation to human rights. Hall understands that the risks relating to suppliers will vary depending on their industry, their location and the size of the entity.
Hall Contracting SDN BHD (Co # 106 6799 K)	Malaysian company	Hall South East Asian headquarters predominately focused on technical support services to the Tendering Department and business development & activities in the SEA region.	
Hall Contracting Pty Ltd (Fiji Branch)	Branch	Hall Pacific Island headquarters. Established in Fiji to conduct marine civil and dredging services in Fiji. Also provides logistics and procurement support for the Pacific region.	
Hall Contracting Pty Ltd (PNG Branch)	Branch	Hall PNG branch conducting operational activities in PNG (no activity in FY24).	
Hall Contracting Pty Ltd (Tuvalu Branch)	Branch	Hall Tuvalu Branch conducting operational and business development activities in Tuvalu.	
Hall Contracting Pty Ltd (Marshall Islands Branch)	Branch	Hall Marshall Islands Branch conducting operational and business development activities in The Republic of the Marshall Islands.	

Identifying risks of Modern Slavery in operations and supply chains

Hall recognises that the construction industry has a large, diverse and complex supply chain. Hall understands the growing need to recognise potential modern slavery risks, and work towards greater transparency to eliminate modern slavery.

Hall believes that all business enterprises should respect human rights and address any adverse impact their business practices have or may have on human rights, as all people have the right to protection from exploitation, violence, and/or abuse. As such, Hall has a zero-tolerance approach to modern slavery within its operations and supply chain, which is detailed as part of the company's Modern Slavery and Human Rights Policy.

At Hall, all staff have a responsibility to prevent, identify, and report on concerns they may have in relation to modern slavery within the business's operations and supply chains.

The procurement of suppliers and materials is common across all of Hall businesses.

Hall has a diverse supply chain that supports the multiple divisions in the Group, although all acting in accordance with the Hall values and vision. Our procurement spend is predominately direct from Australian Suppliers.



The supply chain includes the provision of construction materials and equipment, dredging parts and materials, fuels, corporate and professional services, labour services, personal protective equipment and security services.

As part of these overarching policies, Hall seeks to do business with suppliers who have similar values, ethics, and sustainable business practices, including in relation to human rights, and understands that the risks relating to suppliers will vary depending on industry, geographic location, and company size.

Hall continues to engage a 3rd party to supply a supplier screening program. The program screens our suppliers for modern slavery risks using the most comprehensive global adverse media database available. The system screens for numerous risk profiles including incidents connected to human rights, forced labour and human trafficking being reported over the past 5 years.

This further expands Hall ability to screen its suppliers and identify suppliers with potential issues and can take the appropriate steps to address the findings.

Our Workforce

Hall Group have strong human resources controls in place for on-boarding new employees, reviewing employee's wages and salary agreements and verifying corresponding payments. These form part of our Integrated Management Systems that control the processes within our businesses.

Our employee induction processes also ensures that new employees confirm they have read and understood our policies and minimum standards.



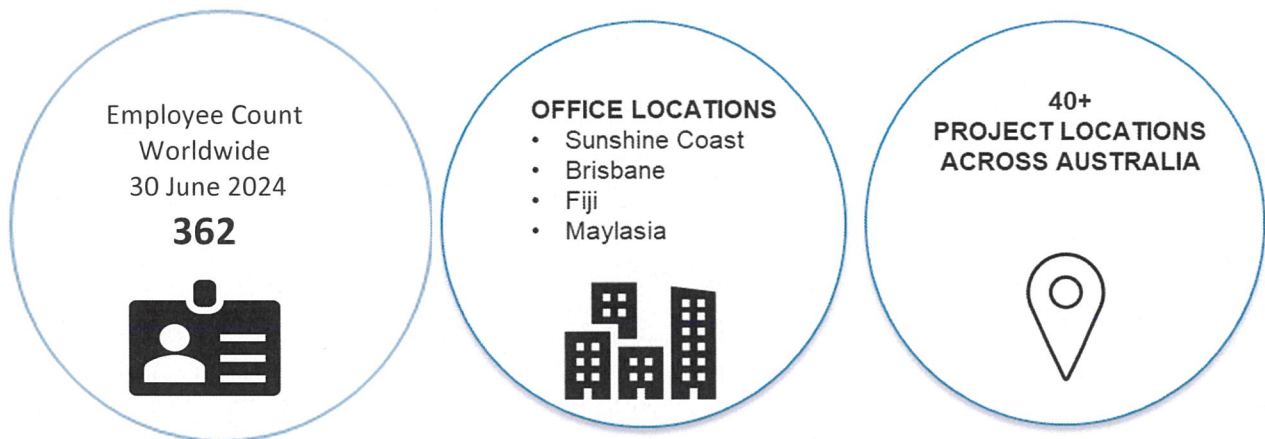
Our employee on-boarding process include working rights employment checks managed by our Human Resources group.

Internal pay parity reviews are undertaken bi-annually against industry benchmarks.

All Australian Labour Hire employees are employed through reputable labour hire firms who pay staff in accordance with applicable modern awards.

Any overseas labour hire employees are paid above award rates and paid through external reputable payroll companies within that country to ensure all relevant industrial relations are applied to their employment.

Provision of company provided accommodation and meals in accordance with Hall Travel Policy with business-wide bookings and management centralised at Head office. Where appropriate, reputable third-party booking and travel agents are engaged.



Supply Chain Assessment

Hall supply chain includes 1,692 direct suppliers who provided a variety of goods and services sourced from 13 countries and with a procurement addressable spend of \$245m in FY24. Key categories of spend include materials for construction projects, plant and labour hire, manufacturing, marine services and fuel. Most of the Hall procurement addressable spend (90%) was paid to Australian-based suppliers.

Over 90% of Hall annual procurement addressable spend is attributable to 340 (21%) “material” suppliers. A “material” supplier partner is defined as a supplier who provides goods and services that are considered material in nature to Hall, for which heightened contractual monitoring processes are in place.

Hall have procured items such as dredge machinery parts, vessel mobilisation costs, construction materials, from suppliers in countries such as Netherlands, China, Singapore, Philippines, Indonesia, New Zealand, Germany, Vanuatu, PNG, UK and Fiji. All overseas payments represent 10% of the total procurement material suppliers in FY24.



Managing Modern Slavery at Hall

Hall is committed to continuing to better understand and more effectively manage the risk of modern slavery within our operations and supply chain. Acknowledging the importance of continuous improvement, Hall continues to apply the developed 'Modern Slavery Framework' which sets out the key elements required to manage slavery risks, and to support the development of prioritised improvements in a coordinated and focused manner.

Hall continue to review of their supplier list, applying a risk assessment criterion that includes consideration of industry, geography and spend to categorise supplier based on potential risks and exposure for further due diligence consideration. The assessment criteria is based on suppliers spend and applying the country risk rating (within the Walk Free Foundations Global Slavery vulnerability index).

Subcontractors are engaged with Hall via sub-contractor agreements, through the terms and conditions stated on Hall purchase orders, and our supplier code of conduct.

Hall have focused on identifying any deemed high-risk areas that may require immediate attention (Tier 1 Risk Assessment) and remediations / communications with high-risk category suppliers.

Region	Cost %	Risk Level	Risk Rating***	Rationale
Australia - Professional Services & Labour Hire	17.32%	Low	1.6	Low-risk region for modern slavery practices
Australia - Plant Hire, Marine & Transport	7.48%	Low	1.6	Low-risk region for modern slavery practices
Australia - Construction & Materials	28.01%	Low *	1.6	Low-risk region for modern slavery practices
Australia - Manufacturing and Other	37.04%	Low *	1.6	Low-risk region for modern slavery practices
Fiji	4.88%	No Rating **	No Rating	A potential risk region for modern slavery practices. Our local presence and close relationships with suppliers helps with observing operational practices.
New Zealand	1.69%	Low	1.6	Low-risk region for modern slavery practices
Singapore	0.29%	Low	2.1	Low-risk region for modern slavery practices
Netherlands	1.30%	Low	0.6	Low-risk region for modern slavery practices
United Kingdom	0.06%	Low	1.8	Low-risk region for modern slavery practices
Germany	0.16%	Low	0.6	Low-risk region for modern slavery practices
Indonesia	0.35%	Moderate	6.7	Moderate-risk region for modern slavery practices. Our long standing and close relationship with key supplier helps with observing operational practices.
Philippines	0.27%	Moderate	7.8	Moderate-risk region for modern slavery practices. Our long standing and close relationship with key supplier helps with observing operational practices.
China	0.26%	Low	4.0	Low-risk region for modern slavery practices
Vanuatu	0.37%	No Rating **	No Rating	Potential risk region for modern slavery practices.
PNG	0.05%	High	10.3	Potential risk region for modern slavery practices.

* Potential risk relating to lack of transparency of vendor's supply chain.

** Country treated as a *Potential Risk* due to country not yet rated in Global Index

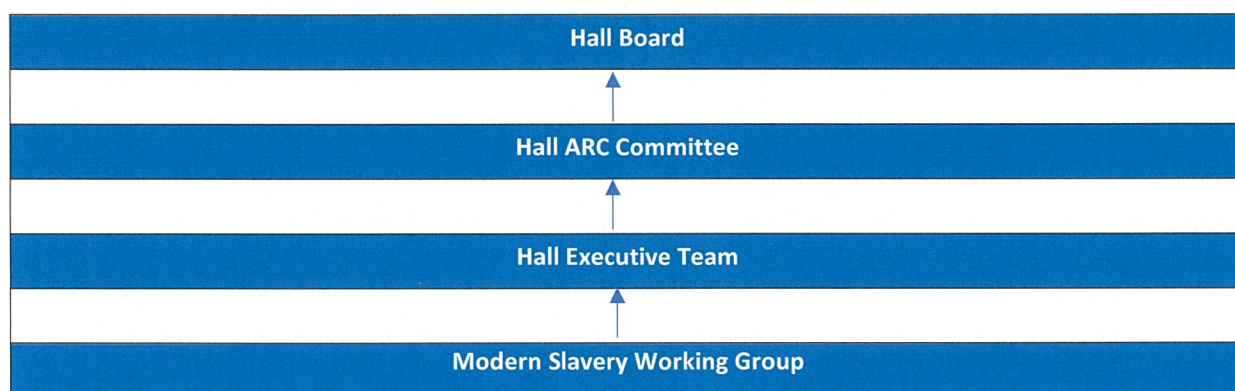
*** Risk rating equal to prevalence ratio as found in the Walk Free 2023 Global Slavery Index data.

Risk Level Source: <https://www.globalslaveryindex.org>

Governance Structure

Hall Board has responsibility for establishing a framework of risk management across Hall Group. The Audit & Risk Committee (ARC Committee) assists the Board in its responsibilities relating to assessing the effectiveness of Hall overall risk management framework & supporting a prudent and risk aware approach to business decisions across the Group. The ARC Committee reviews a wide range of matters relating to financial and non-financial risks, including human rights related risks and those concerning modern slavery. The ARC Committee meet at least four times per year.

The Modern Slavery Working Group (Working Group) develop and implement our modern slavery strategy, manage our various initiatives and ongoing priorities relating to effectively identifying and managing modern slavery risks and due diligence activities (including managing our reporting obligation). The working group includes team members from Human Resources, Executive team, and the Finance Department.



Policy and Modern Slavery Framework

MODERN SLAVERY POLICY - The purpose of this policy is to ensure Hall is committed to utilising ethical suppliers and ensuring that any modern slavery risks in Hall supply chain are identified and that steps are taken to address these risks. Our Modern Slavery Policy and Code of Conduct further reiterates how we expect our employees and directors to conduct business in a way that promotes and respects human rights.

CODE OF CONDUCT – At Hall we promote freedom of expression and open communication, however all our employees and our subcontractors, are expected to follow our Code of Conduct. Our Code of Conduct contains details on the standard of ethics, conduct and behaviour that we are expected to operate under including the observation of basic human rights.

HUMAN RIGHTS POLICY- Outlines Hall commitment to respecting human rights of every person involved in its operations, supply chain and communities.

WHISTLE BLOWER POLICY- Hall recognises the value in developing and fostering a culture of corporate compliance, ethical decision-making and protecting eligible whistle-blowers to make protected disclosures without suffering detriment.

The Whistle Blower Policy also provides a reporting framework through which Hall Employees, contactors and member of the public can report instances of actual or suspected unethical or unlawful conduct without fear for detrimental conduct.

DIVERSITY AND INCLUSION POLICY - This policy outlines Hall's commitment to providing a workplace that embraces workplace diversity and inclusion.

Hall recognises that workplace diversity, including gender, age, ethnicity, and cultural background is a key contributor to our business success. Hall is committed to promoting diversity and providing a respectful environment where employees and others in the workplace are treated fairly and all decisions are based on merit.

FRAUD, ANTI-BRIBERY & CORRUPTION POLICY – Outline Hall zero tolerance to any form of bribery or corruption across all areas of their business.

PROCUREMENT POLICY- Provides objectives, expectations, and responsibilities around procurement of goods, services and / or works on behalf of the group.

SUPPLIER CODE OF CONDUCT – The purpose of this Supplier Code of Conduct is to detail Hall minimum expectations and non-negotiable requirements in the areas of human rights and labour practices; environmental management; professional conduct; governance; and community engagement. This policy details our commitment to responsible procurement and our expectation that our suppliers and their supply chains operate in a manner consistent with Hall values and objectives and relevant legislation. The policy states our expectation of our suppliers and their supply chain, including eliminating all forms of modern slavery. We have communicated this policy to our suppliers and as part of implementing our modern slavery framework. It is also included and attached to Purchase Orders raised at Hall and has also been included in all Major and Minor Subcontractor Agreements.

Our Modern Slavery Policy and Code of Conduct further reiterates how we expect our employees and directors to conduct business in a way that promotes and respects human rights.

Signatory Level Member of the UN Global Compact

Hall is a Signatory Level Member of the UN Global Compact; Hall commits to operating our business in line with the 10 Principles set down by the United Nations. The 10 Principles are spread across four key Social Aspects – Human Rights, Labour, Environment and Anti-corruption. Hall Contracting will report annually on the implementation of the 10 Principles into our business. As an active member of the UN Global Compact, and by aligning our business practices with the 10 Principles of UN, we will also strengthen our commitment to the prevention and reduction of Modern Slavery.



Human Rights

[Principle 1](#): Businesses should support and respect the protection of internationally proclaimed human rights; and

[Principle 2](#): make sure that they are not complicit in human rights abuses.



Labour

[Principle 3](#): Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

[Principle 4](#): the elimination of all forms of forced and compulsory labour;

[Principle 5](#): the effective abolition of child labour; and

[Principle 6](#): the elimination of discrimination in respect of employment and occupation.



Environment

[Principle 7](#): Businesses should support a precautionary approach to environmental challenges;

[Principle 8](#): undertake initiatives to promote greater environmental responsibility; and

[Principle 9](#): encourage the development and diffusion of environmentally friendly technologies.



Anti-Corruption

[Principle 10](#): Businesses should work against corruption in all its forms, including extortion and bribery.

Hall modern slavery framework is aimed at preventing, detecting, and responding to incidents of modern slavery and human rights within its operations and supply chain. Based on the primary work performed by the Hall Group, the location of its companies and where projects are undertaken, Hall Group acknowledges there is risk of modern slavery within its supply chains.

Hall has risk management processes to assist in identifying areas of concern to allow mitigating action to be taken to lessen or remove those risks including but not limited to.

Action	Deliverable	Responsibility
Supplier Screening	All high-risk suppliers will be screened using the Ethical Supplier Screening from Equifax. The system screened for numerous risk profiles including incidents connected to human rights, forced labour and human trafficking being reported over the past 5 years.	Financial Controller
Performing annual review of suppliers	After the end of each financial year apply risk criteria to the applied to the supplier list based on spend, country risk rating and sending out mandatory Modern Slavery questionnaire to "high risk" suppliers.	Financial Controller
On-Boarding of suppliers	Imbed due diligence processes for onboarding certain "risk graded" suppliers.	Financial Controller, Company authorised procurement personnel
Communicate our Human Rights, Modern Slavery Policies and Framework internally and externally	Communicate to internal staff and stakeholders our policies and framework through Hall Induction. Maintain systems to deliver services which are aligned with Hall Modern Slavery and Human Rights Policies.	Human Resources Manager, HSE Manager
Supplier Code of Conduct	Communicate Supplier Code of Conduct by attaching to Purchase Orders and including Subcontractor Agreements.	Company authorised procurement personnel
Provide Internal Training on Modern Slavery for all staff actively involved in purchasing goods and services	Internal training for modern slavery to be completed in the Hall Induction program	Human Resources, HSE Manager
Transparency of supply chains	Prepare a modern slavery statement by December each year and upload to the border force, with formal oversight and approved from Hall Groups Board of Directors.	Human Resources, Modern Slavery Working Group, Board of Directors

At Hall Group, we regularly review our processes and practices to ensure continuous improvement and alignment with our obligations to support our consistent delivery of projects within the Civil, Marine Civil and Dredging sectors.

Whistleblowing at Hall

Hall encourages employees and external stakeholders to report any improper conduct they encounter. All complaints are investigated in a fair and objective manner, including the involvement of external parties where appropriate.

Modern Slavery Internal Training Module

To help manage the risk and increase awareness of this important issue, Hall developed and continues to use an in-house modern slavery internal training module. The module is compulsory for all employees who are actively involved in procurement. The module identifies risk indicators of modern slavery, defines and explains modern slavery, what it means and what it encompasses. It identifies how modern slavery can manifest in supply chains, interprets, and applies the modern slavery compliance framework and demonstrates understanding of the employee's role, and the role of the Hall Group, in combating modern slavery.

In addition, the training details our governance arrangements, including the various escalation and reporting channels for suspected breaches so that incidents, once identified, are directed to the appropriate people who can address them.

Measuring effectiveness

Our modern slavery diligence processes will be reviewed regularly and reported to the Audit and Risk Committee as part of our risk management review process. Our risk assessment procedure requires annual reviews of all risks and controls, including modern slavery risks identified in our operations and supply chain.

Hall acknowledges the importance of assessing the effectiveness of our actions to manage risks of modern slavery in our operations and supply chain. For this reporting period our focus was improving our modern slavery framework.



Continuous improvement

Hall continues its commitment to continually improving its modern slavery framework and a range of actions are planned and will be reported on in subsequent statements. They include the following;

- Continuing to improve response rates from its suppliers.
- Continuing to improve the procurement process to streamline supplier engagement & onboarding due diligence processes.
- Enhanced and more formalised operations of the Modern Slavery Working Group designed to enhance effectiveness and depth of supplier review.
- Continue to explore other methods of deeper assessment into Hall Groups supply chain.

During the last four reporting periods Hall have implemented the following.

Milestone	Performance indicator	Completion	Target 2025
POLICIES			
	Modern Slavery Statement	(Published) FY2020	Ongoing
	Modern Slavery Policy	(Published) FY2021	N/A
	Human Rights Policy	(Published) FY2021	N/A
	Supplier Code of Conduct	(Published) FY2021	N/A
Due Diligence			
	Signatory Level Member of the UN Global Compact	FY 2021	N/A
	Modern Slavery Questionnaire	(Published) FY2020	Ongoing
	Ethical Supplier Screening	Complete FY2023	Ongoing
	Subcontractor Agreements updated to include Supplier Code of Conduct and Modern Slavery Clause.	Complete FY2023	N/A
	Enhanced Due Diligence protocols for high-risk regions and industries.	FY 2024 – Modern Slavery Working Group Deliverable	Ongoing
Training and Education			
	Internal Modern Slavery Training Module	(Published) FY2021	Ongoing
	All Company policies issued to staff upon commencement of employment		Ongoing

Consultation with other Hall entities

This statement is made pursuant to the Act and constitutes Hall Modern Slavery statement in respect of the 30 June 2024 financial year and is approved by the principal governing body of Hall Group, being its Board of Directors. The related Hall entities all have the same Board of Directors, and therefore Directors of all related entities have been consulted with in preparing this Modern Slavery Statement. The parent company of the Hall Group is Hall Holdco Pty Ltd which is the Reporting Entity for this statement.

Additional relevant Information

All Hall staff have a responsibility to prevent, identify and report any concerns they may have in relation to modern slavery within Hall operations and supply chains. Such concerns are to be reported to the appropriate manager or otherwise in accordance with Hall Whistle Blower Policy. All reports of concerns relating to modern slavery will be treated with sensitivity, confidentiality and will be taken seriously.

Approval

Approved by Hall Group Board of Directors, dated 19 December 2024.

Signed in accordance with the requirements of the *Modern Slavery Act 2018* (Cth);



Cameron Hall
CEO
19 December 2024