

A photograph of a modern building's exterior. The building features a glass facade with a large, stylized logo. A staircase with a glass railing is visible in the center. To the right, there is a vertical garden wall with various green plants. The overall scene is brightly lit, suggesting daytime.

MODERN SLAVERY STATEMENT 2021

THE HARRIS HMC GROUP

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INTRODUCTION

The Harris HMC Group recognises and understands the importance of respecting and protecting the human rights of all people. As a prominent organisation within the Construction and Services Industry we are in a position where we can promote and enact positive change across our business, industry, and the communities in which we live, work and play. In our first year of reporting, this statement outlines our early progress in establishing and using a risk management framework and our initial steps to combat the risk of modern slavery in our operations and supply chains.

Looking ahead, The Harris HMC Group commits to continuous improvement. We will continue to develop our Modern Slavery Framework, processes and conversations and will engage with our clients, employees and suppliers ensuring the growth of our business is done in a socially responsible way.



Dale Kennedy
Managing Director

This statement has been prepared by HT1 Pty Ltd (The Harris HMC Group) and developed in accordance with the requirements of the Australian Modern Slavery Act 2018 (Cth) (the Act). It details how The Harris HMC Group has commenced identifying, assessing, and addressing modern slavery risks in our supply chain and operations during the year ending 30 June 2021.

The Harris HMC Group recognises the importance of protecting human rights of all people, including our employees, customers, communities and those within our supply chain. This is our first Statement in accordance to the Act.

We are in the early stages of engagement with subcontractors and suppliers to provide initial clarity around their operations. In the 2022 financial year, we intend to increase our engagement with additional suppliers and subcontractors.

At the date of this statement, The Harris HMC Group had not identified any instances of modern slavery in our operations or supply chain.

This Modern Slavery Statement is approved by The Harris HMC Group Board of Directors on 15th December 2021.

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, HMC Div 6 Pty Ltd, UBOS Australia Pty Ltd.

An integrated construction group, spanning a breadth of industry sectors each 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 246 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 2020/2021 financial year reporting period in accordance with the Act.

BUSINESS STRUCTURE OVERVIEW DIAGRAM

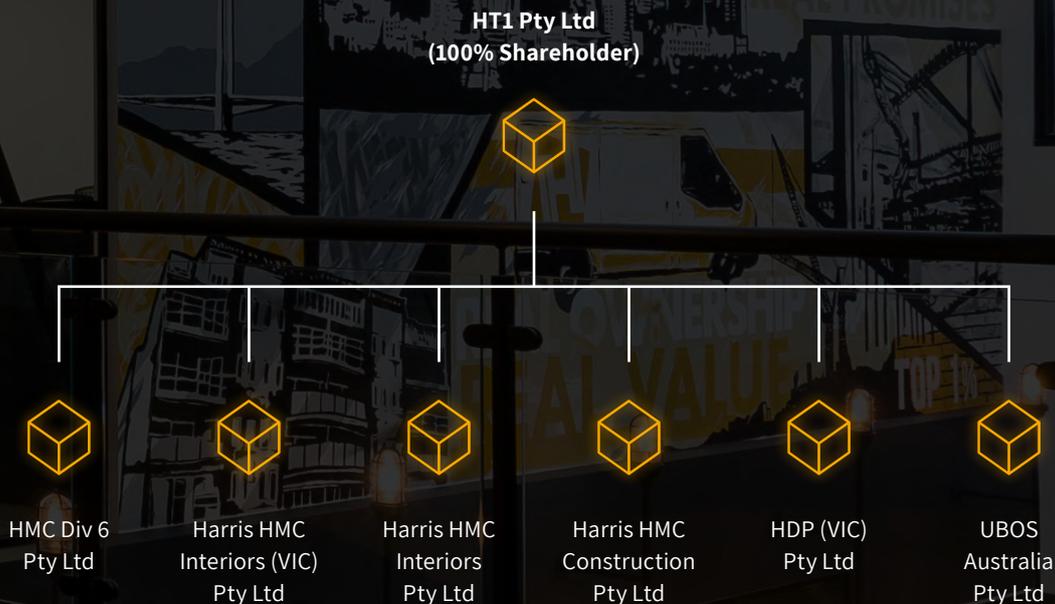


Figure 1 (above): The Harris HMC Groups's business structure, as relevant to this Modern Slavery Statement. With the relevant functions shared between them, this Statement covers Harris HMC Interiors Pty Ltd, Harris HMC Interiors (VIC) Pty Ltd, Harris HMC Construction Pty Ltd, HDP (VIC) Pty Ltd, HMC 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
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 and has one of the lowest modern slavery estimated prevalence scores globally¹.

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.

In 2021, The Harris HMC Group completed an initial modern slavery assessment of 15 directly engaged suppliers, ranking them by spend². These priority subcontractors and suppliers were then invited to participate in the iPro Modern Slavery Assessment, enabling The Harris HMC Group to collect additional information on their approach to managing modern slavery risk.

The total number of suppliers that participated in the modern slavery declaration was 86.7% - 13 out of 15. The 13 suppliers that completed the declaration have been evaluated as per the following risk score categorisation.

Risk Level	Suppliers
Low Risk (no perceived inherent risk)	1 (7.7%)
Low Risk (adequate risk control)	2 (15.4%)
Medium Risk	3 (23.1%)
High Risk	4 (53.8%)



Supply Chain Risks

The Harris HMC Group acknowledges we have identified the following aspects of our supply chain and associated risks:

- Trades and subcontracting
- Operational procurement
- Imported construction materials

Trades and Subcontracting

The Harris HMC Group engage specialist trades for works including structural, electrical and plumbing.

The Harris HMC Group engage approximately 765 subcontractor businesses at any time, with approximately 1550 contracts let in the year ending 30 June 2021. 98% of these subcontractors and suppliers are located within Australia.

We acknowledge that we recruit through an agency or labour hire company, which increases the risk factor as we are not directly involved through this process.

Operational Procurement

Additional to subcontractor and/or supplier procurement we source a varied range of goods and services including:

- Construction materials
- Plant and equipment hire
- Professional engineering services
- Workforce labour hire
- Business and services and products including cleaning

¹ Walk Free Foundation, Global Slavery Index 2018.

² The Harris HMC Group recognises that value of spend does not necessarily correlate with modern slavery risk. However, we nonetheless consider value of spend to be a useful preliminary reference point to prioritise our risk assessment efforts as it allows us to identify procurement activities and relationships where we may be able to exert the greatest influence.

TIER 1 SUPPLIERS

COUNTRIES OF OPERATION



Imported Construction Materials

Many of our construction materials are imported, sourced, processed and assembled offshore and may involve multiple countries, which may increase the risk of modern slavery. We continue to work with our suppliers for greater transparency around modern slavery issues. Noting that we are currently focused on assisting our Tier 1 supply chain with the understanding and transparency where we are of highest influence.

Country	Suppliers
Australia	14
New Zealand	2
Hong Kong	1

TIER 2 SUPPLIERS

COUNTRIES OF OPERATION



Country	Suppliers
Australia	10
China	3
New Zealand	2
Brazil	1
Canada	1
Chile	1
Indonesia	1
Israel	1
Italy	1
South Korea	1
Spain	1
United Arab Emirates	1
United Kingdom of Great Britain and Northern Ireland	1
Vietnam	1

Tier 2 represents suppliers of our Tier 1 suppliers.

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:

- Assess and implement a purpose driven online modern slavery training module with specific emphasis on the construction industry.
- Provide periodic modern slavery awareness training for The Harris HMC Group employees.
- Review, update and implement Modern Slavery Policy and draft associated policies likely to incorporate Supplier Code of Conduct, Procurement Policy and Human Rights Policy.
- Develop and roll out action plans to subcontractors and suppliers identified as high risk.
- Request third party labour providers acknowledgement of no recruitment fees paid by workers to the recruiter.
- Have contracts of employment or engagement in place with workers and ensure copies of the workers contracts are readily available.
- Complete a Modern Slavery Assessment prior to onboarding new suppliers and subcontractors with the support of iPro. iPro is an Australian-based software company specialising in digital solutions for Contractor Compliance and ESG responsibilities.



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