

Modern Slavery Statement

Financial Year 2023 - 2024



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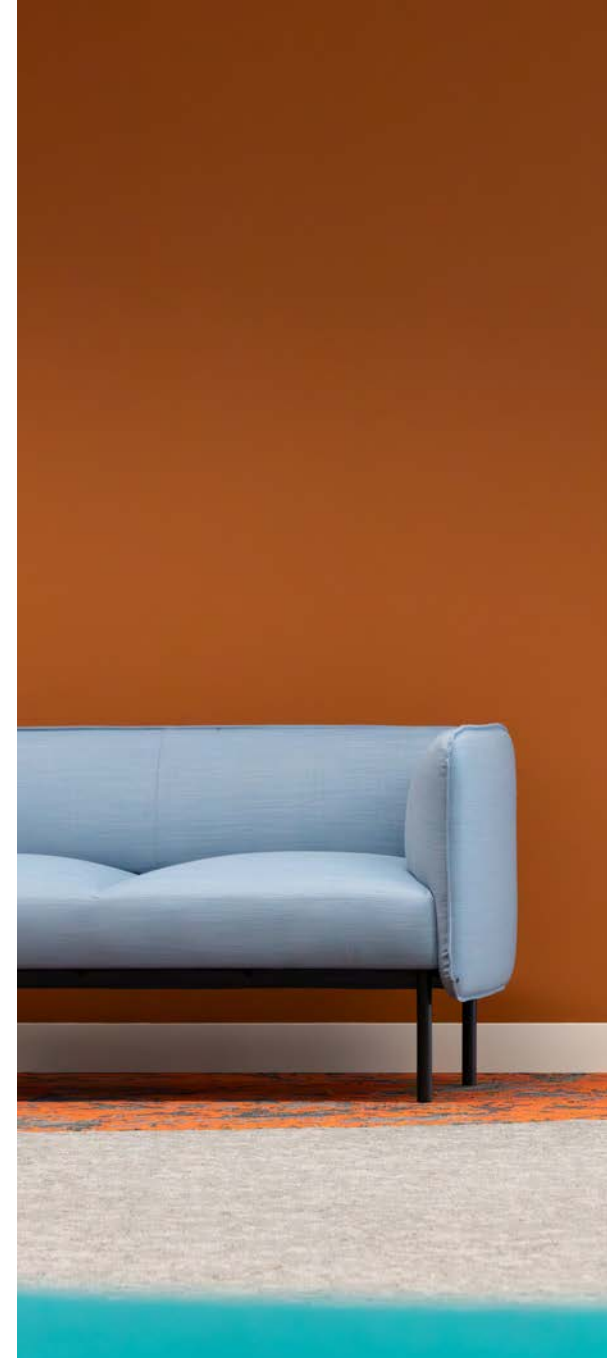
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

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Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)




/ Introduction /

At HT1, we remain deeply committed to upholding honest, fair, and transparent business practices that enable us to create a positive and meaningful impact on both our community and the industry. Modern slavery, in all its forms, has no place within our operations, supply chains, or business partnerships.

FY23/24 has been a year of growth and enhanced understanding, building upon the progress of previous years. We have deepened our focus on identifying and addressing modern slavery risks within our supply chains, particularly with respect to workers in the construction industry and those sectors that support and build our assets. This ongoing effort has involved increased collaboration with our suppliers, seeking greater transparency in their procurement and labour practices.

Modern slavery persists in every country and across numerous industries. As an Australian builder, we recognise the heightened risks inherent in our industry. Factors such as long and complex supply chains, tight margins, strict timelines, the use of raw materials, and reliance on high rates of unskilled labour create significant vulnerability to modern slavery. We remain vigilant in acknowledging these risks and proactively addressing them.

As outlined in this Statement, we reaffirm our commitment to continuous improvement within our operations and to playing an active role in the broader goal of eradicating modern slavery.



Andrew Headberry
Managing Director

/ Our company /

Describe the reporting entity's structure, operations and supply chains

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, UBOS Australia Pty Ltd, HMC Div 6 Pty Ltd, and Harris HMC Constructions (VIC Major) Pty Ltd.

An integrated construction and services group, operating across various industry sectors with similar supply chains:

- Construction solutions
- Fit-out and refurbishment projects
- Programmed and reactive commercial maintenance services
- Programmed and reactive electrical services

These services span multiple sectors, including education, commercial, residential, government, health, aged care, industrial, local councils, and public spaces across Melbourne.

The HT1 Group business address is 52 Henderson Street, North Melbourne VIC 3051. We employ 221 staff under permanent, fixed-term, part-time, and casual contracts, or under enterprise agreements.

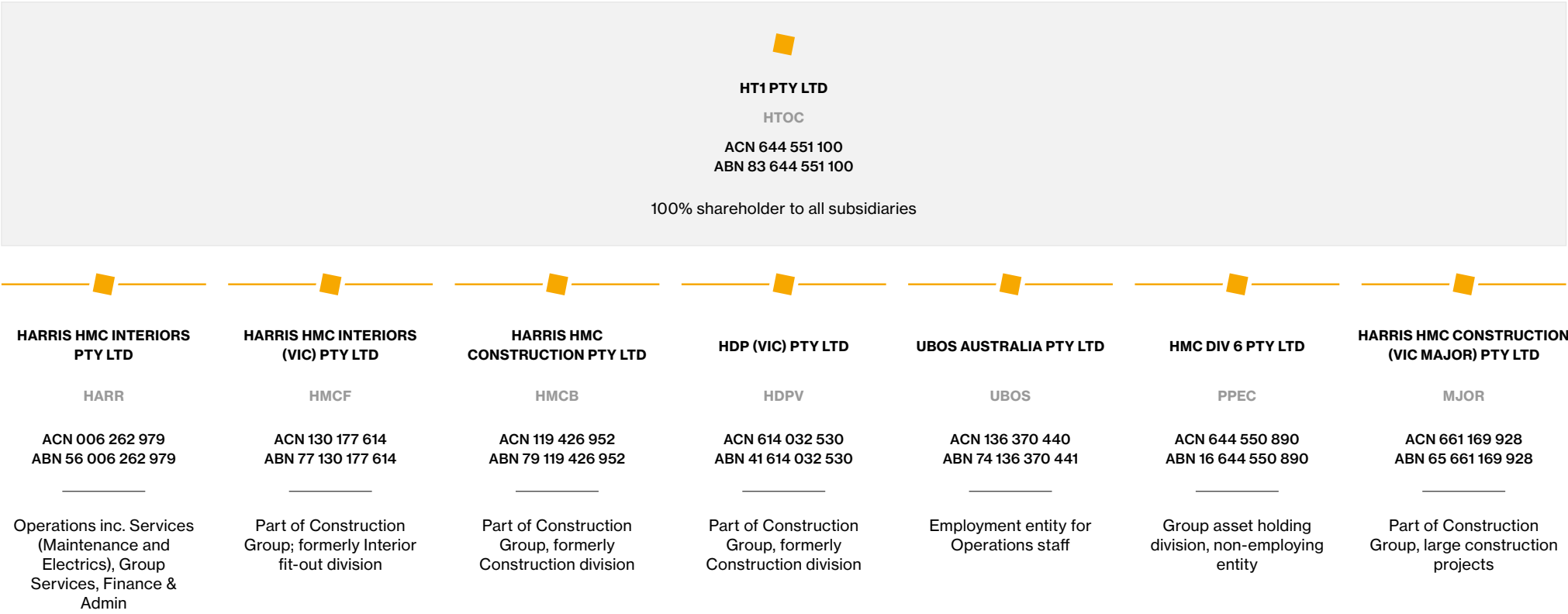
All items outlined within this Statement are applicable across all entities; from the initial risk-scoping exercise conducted with the assistance of external partners, to the Supply Chain Assessment and subsequent risk-reduction policies and procedures.

Reporting period

The HT1 Group operated on the 2023/2024 financial year reporting period in accordance with the Act.



Group Structure and Key Activities



/ Supply chain risks /

Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

HT1's operations

HT1 employs staff across various roles, including Construction Managers, Project Managers, Site Managers, Contract Administrators, Project Coordinators, Estimators, Design Managers, and Construction Workers.

All employees are engaged under workplace agreements, relevant industry awards, or individual agreements.

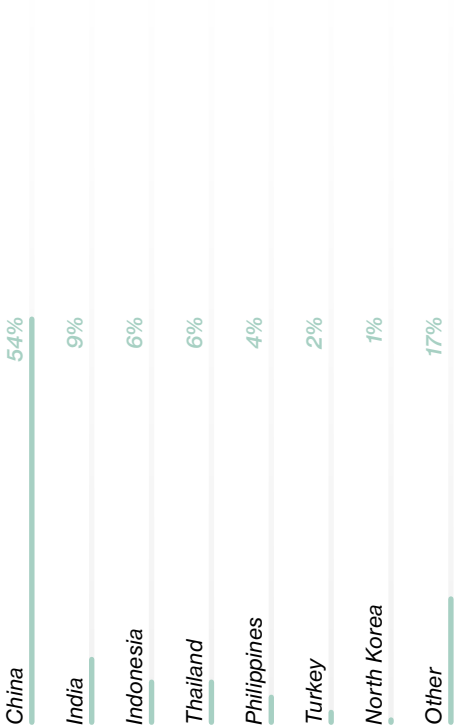
The HT1 Group believes the risk of modern slavery within our directly employed workforce is minimal, as all our employees are based in Australia, a country with one of the lowest global prevalence rates for modern slavery.

Suppliers

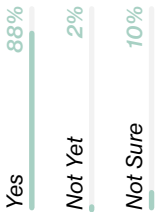
The HT1 Group recognises that the risk of modern slavery practices within our supply chain is greater than in our internal operations. We remain committed to deepening our understanding of these potential risks.

HT1's supply chains involve the production and transportation of construction materials, including but not limited to bricks, windows, joinery, fixtures, and fittings. This encompasses overseas factories where these items are manufactured, their importation into Australia, and their subsequent sale and distribution to HT1. Additionally, our supply chains include essential services, such as cleaning and security companies that support HT1's offices and construction sites.

In 2023, HT1 conducted our third modern slavery assessment of our suppliers. We invited our subcontractors and suppliers to participate in the Informed 365 (Property Council Consortium) Modern Slavery Assessment, allowing us to gather further insights into their strategies for managing modern slavery risks.



SUPPLY CHAIN SOURCES FOR MANUFACTURED PRODUCTS OR SERVICES



DO KEY STAKEHOLDERS UNDERSTAND THE BASIC FACTS AROUND MODERN SLAVERY

/ Actions /

Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

Our approach to managing modern slavery risks is built on a rigorous methodology aimed at identifying, mitigating, and addressing these risks, while continuously evaluating the effectiveness of our actions.

To reinforce this approach, HT1 is developing a comprehensive set of policies and procedures that define our values, operating standards, and expectations for both employees and suppliers.

These documents will ensure that all parties clearly understand our commitments, expectations, and the processes we have in place.

Implementation of Code of Conduct

Harris HMC has implemented a Code of Conduct that outlines clear guidelines regarding ethics and relationships, safeguarding the reputation and interests of HT1 and our stakeholders while governing the behaviour of all employees. This code supports our approach to modern slavery and encompasses various policies, including our Modern Slavery Policy, Grievance Policy, and Whistleblower Policy.

<p>Modern Slavery Policy</p> <p>Establishes a clear commitment to understanding and reducing the risk of modern slavery within our supply chain, outlining HT1's expectations in relation to compliance with all laws relating to modern slavery.</p>	<p>Grievance Policy</p> <p>Establishes a mechanism for individuals, including employees, independent contractors, volunteers, and visitors entering a Harris HMC worksite, to raise concerns, ensuring that grievances are addressed promptly and effectively.</p>	<p>Whistleblower Policy</p> <p>Encourages a mechanism for individuals, employees, independent contractors, volunteers and visitors entering a Harris HMC worksite, to report any suspected wrongdoing, misconduct or unethical behaviour within HT1, providing protection for whistleblowers and fostering a culture of transparency and accountability.</p>
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As part of our commitment to transparency and ethical behaviour, we have established the Speak-Up Channel, an anonymous reporting platform. This platform enables staff and contractors to confidentially report feedback, issues, or behaviours that contravene our policies, Code of Conduct, or values. The Speak-Up Channel fosters a safe environment for raising concerns, ensuring they are addressed appropriately while protecting the identities of those who report. This initiative reinforces our dedication to accountability and maintaining a respectful and inclusive workplace.



Implementation of LMS

We have implemented a new Learning Management System (LMS) designed to enhance our training and compliance efforts across our organisation. This innovative platform will allow us to share valuable learning insights and streamline the delivery of compliance modules, including those focused on modern slavery awareness and prevention.

By utilising the LMS, we will provide all employees with easy access to comprehensive training resources, ensuring that everyone is informed about modern slavery risks and their responsibilities in combatting them. The system's interactive features and tracking capabilities will enable us to monitor progress and engagement, fostering a culture of accountability and continuous improvement.

As part of our commitment to compliance, all new employees are required to complete the modern slavery training module during their onboarding process. The course is updated annually to ensure it remains aligned with the latest regulations and industry standards.

This regular update ensures that our employees are equipped with up-to-date knowledge, enabling them to effectively identify and address potential modern slavery risks.

Ultimately, the LMS will play a crucial role in equipping our workforce with the knowledge and skills necessary to identify and address modern slavery, reinforcing our commitment to ethical practices and the protection of human rights within our operations and supply chains.

Further actions undertaken in the last 12 months

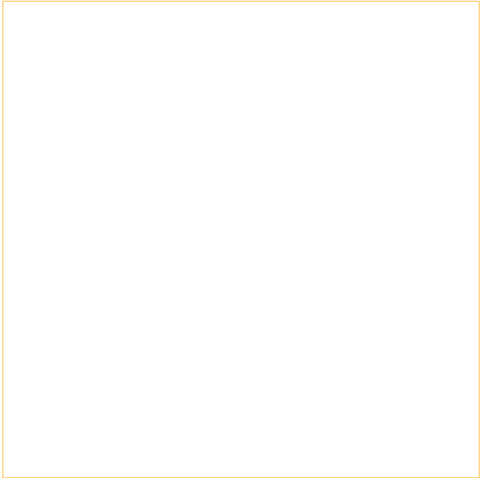
Modern slavery training is included in our compliance suite and is provided to all new employees during the onboarding process. Additionally, all current employees are required to complete updated modern slavery training, with a current completion rate of 98.1%.

We have reviewed and updated our modern slavery provisions within HT1 Group's subcontracts and supply agreements. This proactive measure underscores our commitment to addressing and mitigating the risks associated with modern slavery within our business operations and supply chains.



Continued actively hiring staff directly where possible to minimise risks associated with Labor Hire companies.

Establishment of a procedure for addressing allegations of modern slavery within our supply chain.



/ Assessment /

Describe how the reporting entity assesses the effectiveness of these actions

Mitigation and remediating risks associated with modern slavery

Continuous improvement and the ongoing assessment of our actions to identify and mitigate modern slavery risks in our operations and supply chains are critical to an effective response to modern slavery. Our methodology, risk assessments, supplier due diligence, and other measures taken to address modern slavery risks will undergo regular reviews as we strive to refine and evolve our processes.

HT1 Group's strategy to combat modern slavery includes several planned initiatives, which will be outlined in future reports.

Modern Slavery Subcontractor / Supplier Assessment Survey Review	Review the supplier survey to ensure that we are offering our subcontractors and suppliers a user-friendly and efficient tool that delivers improved reporting data for HT1's use.
Training	Mandating modern slavery compliance training for all HT1 employees during induction.
Modern Slavery Working Group	Continue a HT1 Group modern slavery working group.
Risk Assessment	Annual risk assessment of our supply chain and methodology to assess suppliers across our highest risk categories and to continue developing our supply chain knowledge and to improve our understanding of supplier responses. Ongoing supplier due diligence with a focus on: <ul style="list-style-type: none">increasing the number of invited suppliers utilising our existing risk methodology; andincreasing participation rates and working with suppliers to improve supplier responses.
Procedural Review	Conduct a review of all modern slavery procedures.
Supplier Pre-Qualification	Implement a process ensuring key suppliers complete a modern slavery assessment as part of the procurement and onboarding process.

/ Consultation /

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HT1 Pty Ltd is committed to establishing and maintaining a comprehensive, organisation-wide strategy to combat modern slavery.

This report has been created in collaboration with our Finance and People & Culture departments. The collaborative process involved assessing the diverse risks of modern slavery across the organisation, conducting a group-wide risk assessment, developing an action plan for the upcoming reporting period, and evaluating the content of this statement.

The board of HT1 Pty Ltd, serving as the primary governing body, approved this statement on 20 December 2024.



Dale Kennedy
Director



Andrew Headberry
Managing Director



Arthur Kennedy
Non-Executive Director



Geoff Dart
Non-Executive Director



Modern Slavery Statement 2024

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