



HALL GROUP
MODERN SLAVERY STATEMENT
FINANCIAL YEAR 2021

Table of Contents

About this Statement.....	3
Background & Reporting Entity	3
Structure, Operations and supply chain	4
Identifying risks of Modern Slavery in operations and supply chains.....	5
Our Workforce	6
Supply Chain Assessment	7
Governance Structure.....	7
Policy and Modern Slavery Framework.....	8
Whistleblowing at Hall.....	10
Modern Slavery Internal Training Module	10
Measuring effectiveness.....	10
Continuous improvement.....	10
Consultation with other Hall entities	11
Additional relevant Information	11
Approval.....	11

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's Modern Slavery Working Group and endorsed by Hall's Board.

Background & Reporting Entity

Hall Group (Hall) has been in operation for more than 70 years and employ over 200 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 civil marine contractors, Halls deliver large-scale works for ports, major marine facilities, canal and other marine developments across Australia, the Pacific Islands and South East Asia.

Hall's civil division delivers a range of services including infrastructure works and urban development services for Private Enterprise, Government Corporations, Large Corporations, Developers and Local Councils across South East Queensland.

Civil Marine Services in Australia and the Pacific include strategies to build up communities, improve coastal resilience and reduce vulnerability to the effects of climate change. Halls have successfully built seawalls, Jetty's, 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. Halls 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's 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.

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's 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 from direct Australian Suppliers.
Hall BidCo Pty Ltd (ACN 623 029 292)	Non-operating Australian Company	None	
Hall Contracting Pty Ltd (ACN 009 786 065)	Australian Company	Halls 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.	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 Contracting Pty Ltd (ACN 162 052 959)	Non-operating Australian Company	Engaged in select Civil Operations in South East Queensland	
Hall Dredging 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 seeks to procure suppliers that share Hall's 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 Plant Hire Pacific Pty Ltd (Co# ICA11983/2015)	Cook Islands Company	Hall Tug operations in the Pacific Islands	
Hall Contracting SDN BHD (Co # 106 6799 K)	Malaysian company	Hall's south east Asian headquarters predominately focused on technical support services to the Tendering Department and business development & activities in the SEA region.	
Hall Vanuatu Pty Ltd (Co # 300 394)	Vanuatu Company	Hall Vanuatu branch conducting operational activities in Vanuatu (no activity in FY20).	
Hall Fiji (Branch)	Branch	Hall's Pacific Island headquarters. Established in Fiji to conduct marine civil and dredging services in Fiji.	
Hall PNG (Branch)	Branch	Hall PNG branch conducting operational activities in PNG (no activity in FY20).	
Hall Tuvalu (Branch)	Branch	Hall Tuvalu Branch conducting operational and business development in Tuvalu (no activity in FY20).	

Identifying risks of Modern Slavery in operations and supply chains

Modern slavery has a broad scope and includes practices involving slavery or slavery like offences, forced labour, deceptive recruiting for labour or services, forced marriage offences, debt bondage, threats of coercion, trafficking in persons and/or children, organ trafficking, and/or harbouring a victim.

Modern slavery is unlikely to prosper where other human rights are respected and therefore Hall's undertakes to comply with the Modern Slavery Act 2018 (Cth) and all other applicable modern slavery and human rights laws and frameworks, and expects all Hall's employees and suppliers to comply with these commitments as well.

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 has 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 Human Rights Policy.

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

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's 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, PP&E and security services.

Hall seeks to procure suppliers that share Hall's 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.

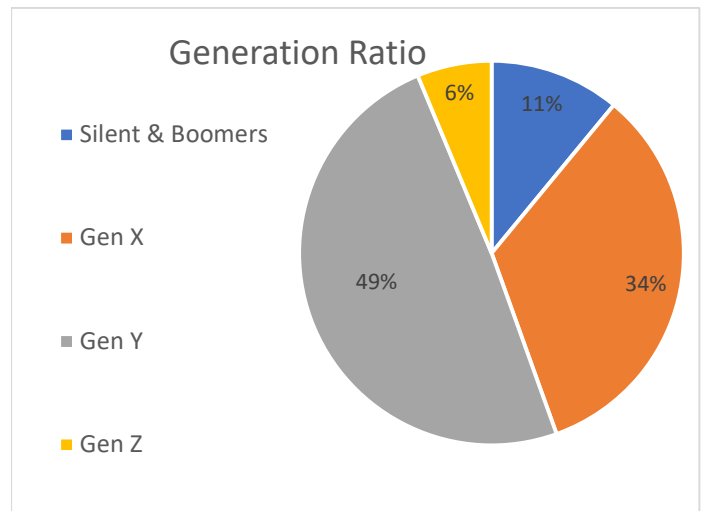
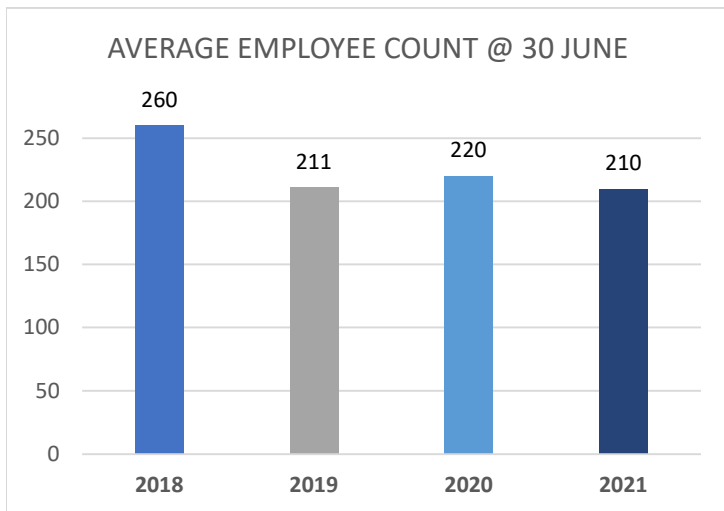
Our Workforce

During 2021 we had a workforce average of 210 employees, with a median age of 41 years old.

The majority of Hall Group employees are employed directly and under permanent, fixed term, part time or casual contracts, or under enterprise bargaining agreements, which are assessed and approved by Fair Work Australia and deemed compliant by the ABCC under the *Code for the Tendering and Performance of Building Work 2016* (the Code). Hall's workforce also enjoys the protections of;

- Modern Awards and industrial instruments;
- The National Employment Standards;
- The various State and Territory work health and safety regimes;
- The various State, Territory and Commonwealth anti-discrimination regimes;
- Halls own policies relating to Quality, Health and Safety, Modern Slavery, Rehabilitation and Return to Work, Code of Conduct, Human Rights and Whistle Blowing.

All company employee contracts meet or exceed the applicable employment legislation in the countries in which the company operates



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's 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's business activities in 2021 were very similar to 2020 which was predominately Australia based with >90% of supplies sourced from Australian based companies.

Hall payments to suppliers in financial year 2021 was approximately \$120m across circa 360 suppliers including those provisioning long-term relationships, those under subcontracted arrangements (typically short-term) and one off, low value goods and services.

Hall have procured items such as dredge and machinery parts from suppliers in countries such as China, The Netherlands and the Pacific Islands, however when measured by value most of our payments are made to suppliers in Australia.

Hall have undertaken a review of their supplier list, applying a risk assessment criteria that includes consideration of industry, geography and spend to categorise suppliers based on potential risks and exposures for further due diligence consideration.

The assessment criteria was based on suppliers spend and applying the country risk rating (within the Walk Free Foundations Global Slavery vulnerability index). All Pacific island 'large' suppliers were included and Australian repeat suppliers with financial year 2021 annual spend of greater than AUD \$1million.

Our largest spend categories are in Labour hire and the supply of materials for our construction projects.

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

For this statement reporting period we have focused on identifying any deemed high-risk areas that may require immediate attention (Tier 1 Risk Assessment) and remediations and communicated with high- risk category suppliers where appropriate.

Tier 1 risk assessment

Hall has assessed the risk level of all suppliers as the following:

Country of origin (or category)	% suppliers (or % of cost)	Risk level	Rationale
Australia (Professional Services)	18.37%	Low	A low-risk region for modern slavery practices
Australia (Plant Hire & Transport)	20.41%	Low	A low-risk region for modern slavery
Australia (Construction Industry)	38.44%	Low	A low-risk region for modern slavery
Australia (Manufacturer / Distributors, Marine)	16.67%	Low (possible Tier 2 risk)	A low-risk region for modern slavery locally however their practices in assessing supply chain risk could be better understood
EU, Japan & US	3.40%	Low (possible Tier 2 risk)	A low-risk region for modern slavery however their practices in assessing supply chain risk could be better understood
China	1.02%	High	High risk region for modern slavery practices
Asia (Excluding China & Japan)	1.02%	High	High risk region for modern slavery practices
Pacific Islands	0.68%	High	High risk region for modern slavery practices

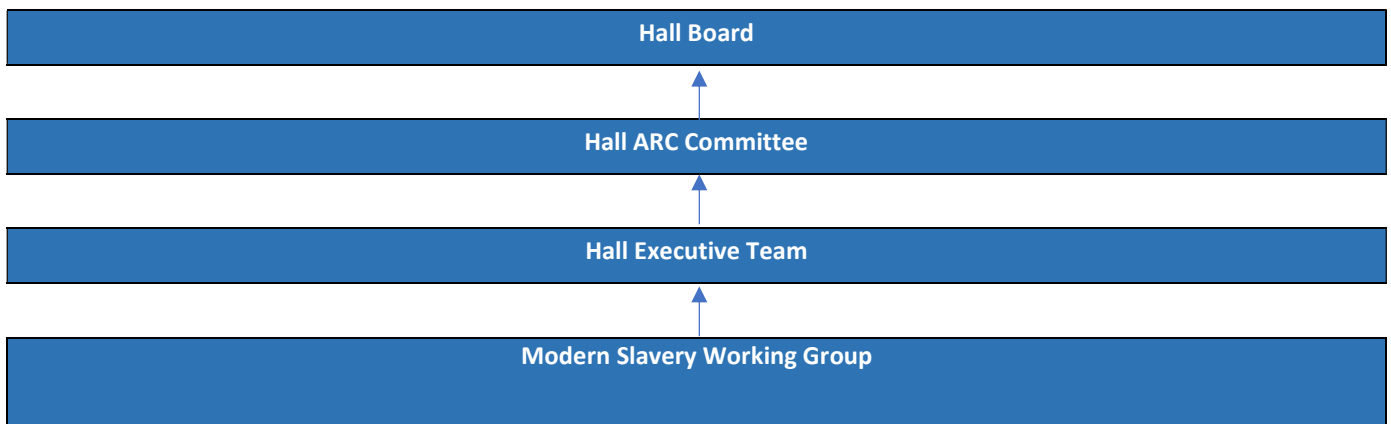
Risk Level Source: <https://www.globalslaveryindex.org>

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's 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 three times per year.

We established a Modern Slavery Working Group (Working Group) to 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

During 2021 Hall implemented a 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’s 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.

Also guiding our approach to modern slavery is our Supplier Code of Conduct. This details our commitment to responsible procurement and our expectation that our suppliers and their supply chains operate in a manner consistent with Hall’s 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.

In 2021 Hall joined the UN Global Compact as we continue to demonstrate of dedication to sustainable development. As 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.

Hall have also updated company policies outlining their commitment and expectations in relation to modern slavery;

Modern Slavery Policy - Outlines Halls commitment to utilising ethical suppliers and ensuring that any modern slavery risks in Hall’s supply chain are identified and that steps are taken to address these risks.

Supplier Code of Conduct – Provides guidance of expected behaviour of all Hall suppliers.

Code of Conduct – Provides guidance of expected behaviour of all Hall employees.

Human Rights Policy- Outlines Hall’s commitment to respecting human rights of every person involved in its operations, supply chain and communities.

Whistle Blower Policy- Provides a reporting framework through which Hall Employees, contactors and member of the public are able to report instances of actual or suspected unethical or unlawful conduct without fear for detrimental conduct.

Fraud, Anti-bribery & Corruption Policy – Outline Hall’s 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.

Hall’s 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 (dredging, civil & marine construction), 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
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.	Company Accountant, Accounts Payable
On-Boarding of suppliers	Imbed due diligence processes for onboarding certain “risk graded” suppliers.	Company Accountant, Accounts Payable, 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’s Modern Slavery and Human Rights Polices.	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, Chief Financial Officer, Senior Financial Analyst

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, Civil Marine 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 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 action plan and due 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, during the past 12 months we have achieved;

- ✓ Developed a new Modern Slavery Policy
- ✓ Developed an in-house modern slavery internal training module
- ✓ Developed a new Supplier Code of Conduct
- ✓ Updated existing policies with modern slavery clauses
- ✓ Joined the UN Global as a Signatory Level Member

As our modern slavery compliance program progresses, we expect that our ways of measuring the effectiveness of our actions to assess and address modern slavery will evolve.

Continuous improvement

Hall is committed 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;

- Improving response rates from its suppliers
- Improving the procurement process to streamline supplier engagement & onboarding due diligence processes.
- Further map out modern slavery risks beyond Tier 1 suppliers (Tier 2+ risk assessment); analysis of our suppliers' suppliers will be undertaken through subsequent reporting periods, this will include:

- Procurement survey of new and existing suppliers focusing on labour practices
- For existing suppliers, priority will be given to those identified as high risk, or possible risk where their supply chain is unknown or known to be from high-risk regions and sectors
- Explore other methods of deeper assessment into Hall Groups supply chain

Consultation with other Hall entities

This statement is made pursuant to the Act and constitutes Hall's Modern Slavery statement in respect of the 30 June 2021 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's 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's Group Board of Directors, dated 21 December 2021

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



Cameron Hall

CEO

21 December 2021