



HAMILTONMARINO

MODERN SLAVERY STATEMENT

2024 / 2025

This Modern Slavery Statement (**Statement**) is made pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**) for the financial year ended 30 June 2025.

REPORTING ENTITY

This is a joint Statement made on behalf of Hamilton & Marino Holdings Pty Ltd (ACN 145 812 228) and its associated entities over which Hamilton & Marino Holdings Pty Ltd has control (as determined in accordance with the Australian Accounting Standards).

For the purposes of this statement, Hamilton & Marino Holdings Pty Ltd and its associated entities are referred to as **Hamilton Marino**.

Hamilton Marino's head office is located at Level 1, 20 Mollison Street, Abbotsford VIC 3067, and we predominately operate throughout metropolitan Melbourne, Victoria.

References in this Statement to a 'year' relate to the financial year ending 30 June 2025.

At Hamilton Marino, we pride ourselves on our strong working relationships with our clients, subcontractors and suppliers, and our hands-on directors are involved in every part of the business, including our supply chain. Hamilton Marino has always been and remains committed to ensuring fair and equitable practices are upheld throughout its supply chain, and to taking proactive and effective action to identifying and avoiding or mitigating the risks of modern slavery practices occurring.

Consistent with the above, since becoming aware of its reporting obligations under the Act in the financial year ending 30 June 2021, Hamilton Marino has been committed to ensuring we avoid the risks of modern slavery practices in our operations and supply chain, and we take our role in the global effort to eradicate such practices seriously.

OUR STRUCTURE AND OPERATIONS

Established in 1975, Hamilton Marino is a privately-owned, dynamic multilevel apartment and commercial construction company.

Our value-added operational model and a reputation built on providing expertise, quality and certainty has made us an innovative industry leader.

Clients rely on us to be cost effective and our inhouse design capabilities, expertise at all stages of a project and rigorous monitoring of expenditure ensure budgets are controlled, always. We have a proud history of large-scale construction across many sectors including multi-residential developments, office construction and fit-out, retail fit-out, hospitality, warehouse and factory construction.

The company has continued to grow on the back of repeat clients, increased project size, prudent financial management and an unwavering commitment to the delivery of all our projects. Our passion, culture, reputation and integrity have attracted a highly skilled, driven team of over 200 like-minded people.

We are proud of the buildings we have contributed to the communities and cities around the country and beyond, and are excited about creating productive and inspiring places in the future.

The strength of our reputation and performance is underpinned by the commercial and administrative procedures that we follow on all projects.

We apply rigour to every aspect of our business by embracing leading technology, online programs and implementing best practice systems. Examples of which are our customised Safety Management Systems, our ASNZ Accreditation and our Design Management Systems.

Accurate up-to-date reporting is key to remaining vigilant against risks in the construction industry, such as those relating to modern slavery practices, as well as to cost control and maintaining excellence in everything we do. Document management and control systems via Aconex online are an important part of this process.

Our stringent and effective systems have been integral to Hamilton Marino enjoying 20+ years of continuous growth, regardless of economic conditions. The confidence and respect of repeat clients, organic growth of project sizes, strategic long-term planning and prudent financial planning have played an important part in our consistently strong balance sheet.

CONSULTATION WITH CONTROLLED ENTITIES

The associated entities that are part of the Hamilton Marino group carry out the same or similar operations and are largely managed by the same representatives. As such, each entity has intrinsically been consulted with and has provided input in Hamilton Marino's approach to modern slavery and the preparation of this Statement.

This consultation has extended to:

- regular discussions with key stakeholders and departments within Hamilton Marino, including directors, procurement, commercial and legal;
- receiving input and approval from these key stakeholders and departments (covering all the associated entities) in relation to the adoption of our Modern Slavery Policy and this Statement, particularly in respect of procurement and delivery;
- continuing to liaise directly with and carrying out ongoing due diligence into one of our key suppliers which sources its products and materials off-shore, Yintec (Australia) Pty Ltd, specifically in relation to their operations, supply chains and working conditions offshore.

Our modern slavery working group includes representatives involved in legal, procurement, and from key suppliers responsible for off-shore procurement, such as Yintec as listed above.

This close relationship ensures we have fully transparency over Hamilton Marino operations and those of one of our key suppliers, so that we can maintain confidence that its operations are free from modern slavery practices.

SUPPLY CHAIN

Being a design and construct builder, Hamilton Marino has a complex and diverse global supply chain. We involve international procurement as part of the delivery strategy for our projects, with our supply chain including the design, manufacture and supply of a number of products we use in our construction projects.

In the past year, Hamilton Marino has continued to work with hundreds of different suppliers, ranging from small privately run businesses to multinational companies.

The key trades include:

- excavation and site retention works;
- structural works, including concreting works, precast panel supply and façade-element supply;
- joinery and carpentry works;
- engineering services and works, including hydraulic, electrical, mechanical and fire;
- façade supply;
- civil and landscaping works;
- supply of plant and equipment;
- hire of constructional plant and equipment.

The key international procurement items include:

- lifts and other key plant;

- façade, including glazing elements;
- joinery;
- precast panels.

In addition to the above, Hamilton Marino also sources goods and services for a range of ancillary and contributory providers, such as labour hire, stationary, uniforms, cleaners, personal protective equipment and the like.

Most of our suppliers are based in Australia (which is considered a low modern slavery risk country), however it is possible that they (like Hamilton Marino) rely on overseas suppliers themselves. Our continual assessments into our extended supply chain has assisted Hamilton Marino to better understand the operations of our local and overseas suppliers.

Of our overseas suppliers, which are predominately based in China, we have continued to minimise the overall number of suppliers that we engage with so that we can cultivate and maintain ongoing and enduring working relationships with the same supplier or suppliers. This allows us to build on our due diligence into their operations so that we can closely monitor their activities and ensure we are working with reputable and trusted partners. We also establish and maintain strong and close working relationships with our suppliers to ensure the best practices are followed. As referred to above, we liaise directly with our overseas suppliers such as Yintec in relation to their operations to ensure they maintain their commitment to fair and equitable practices.

Our suppliers are generally providing higher value items, which presents a lower risk in modern slavery risk given the specialised and technical nature of the products.

A key change for Hamilton Marino in this financial year is that we have greatly increased our direct procurement with suppliers based in China, rather than procuring via Yintec as an intermediary. This direct procurement with our China-based suppliers provides us with greater transparency and insight into the operations of these suppliers, enabling us to expand our vigilance against modern slavery risks.

RISK OF MODERN SLAVERY PRACTICES

Hamilton Marino understands that there is an inherent risk of modern slavery practices occurring in its operations and supply chain given its reliance on offshore manufacturing, which could potentially result in Hamilton Marino either causing, contributing to, or being directly or indirectly involved in or linked to modern slavery practices.

Specific risk areas include:

- Fabrication of prefabricated building elements (e.g. cladding, joinery, steel) in China;
- Raw material sourcing (e.g. stone, timber);
- Labour used in manufacturing and processing facilities overseas;
- Limited visibility over second- and third-tier suppliers engaged by our direct contractors.

While key risks include the business' use of overseas procurement, modern slavery practices are broad and extend to risks to people in all marketplaces. Such risks are complicated, evolving and at times invisible, meaning that Hamilton Marino must remain vigilant and regularly assess these risks.

ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS

Hamilton Marino is committed to engaging only those suppliers that uphold the same principles as Hamilton Marino, and where necessary, implementing corrective measures. We work closely with our subcontractors and essential suppliers to ensure an open and collaborative approach at all levels of our business.

Policies

All Hamilton Marino employees, subcontractors and suppliers are required to adhere to our Modern Slavery Policy, which sets out the minimum standards of behaviour and conduct that Hamilton Marino expects its suppliers to meet in respect of modern slavery.

This policy also sets out an obligation to report on any non-compliance with the policy and empowers Hamilton Marino to require any non-compliances to be rectified.

Tendering and engagement

As part of our tender and engagement process, all subcontractors and suppliers are required to:

- complete a pre-qualification questionnaire, which includes questions which seek to detect a supplier's risk of modern slavery practices within either their own operations or those of their supply chain;
- submit a tender which complies with all applicable laws, standards and regulations, including those relating to modern slavery;
- be engaged under Hamilton Marino's standard terms and conditions (subject to negotiations agreed between the parties) which require:
 - compliance with all applicable laws, standards and regulations, including those relating to modern slavery;
 - the subcontractor or supplier to affirm that they have no knowledge of any modern slavery practices occurring within their organisation or supply chain, that they take steps to identify any such practices and will notify Hamilton Marino if they become aware of any;
- complete a post-award questionnaire via our online safety software platform which requires them to re-affirm their compliance with all applicable laws, standards and regulations, including those relating to modern slavery.

Desktop risk assessment

We maintain an ongoing desktop risk assessment of our suppliers to continually build on our understanding of their operations and supply chains (including our own). This desktop risk assessment seeks to identify those products and services in our operation and supply chain which might involve risks of modern slavery, assist us in identifying potential risk exposures and where possible take steps to better understand, avoid and mitigate those risks. This assessment aims to determine the country of origin of all goods sourced by Hamilton Marino and its suppliers, and the types of those products and materials.

Strengthening contracts

Hamilton Marino's agreements have been updated to include specific provisions relation to modern slavery, requiring the subcontractor or supplier to:

- comply with all modern slavery laws;
- acknowledge that they have no knowledge of any modern slavery practices occurring;
- take all reasonable steps to confirm that it is not engaging in any modern slavery practices
- notify Hamilton Marino upon becoming aware of any modern slavery practices.

Training

Hamilton Marino carries out educational training on a periodic and as-needed basis to senior management and those overseeing procurement to improve staff awareness of modern slavery risks, and how to identify and address any concerns regarding modern slavery practices when assessing a supplier's actions and behaviour.

Remediation processes

Where Hamilton Marino identifies that there is or may be a risk of modern slavery practices, Hamilton Marino's response will include:

- gathering further information to better and more fully understand the potential modern slavery risk;
- taking steps to ensure that any potential harm caused by the modern slavery risk is avoided or, if it has occurred, mitigated and won't occur again;
- communicating the modern slavery risk with the appropriate authorities;
- taking the necessary steps to ensure that the circumstances which caused or contributed to the modern slavery risk won't occur again.

Supplier case studies

As mentioned above, Hamilton Marino seeks to foster ongoing and enduring relationships with its key offshore suppliers so that it can continually build on its working relationship with them, as well as its due diligence into the operations.

As part of this, and in light of Hamilton Marino decreasing its reliance on Yintec (Australia) Pty Ltd as an intermediary when sourcing goods from China, Hamilton Marino has increased its procurement of goods and materials directly from suppliers based in China, which remains a jurisdiction at inherent risk of modern slavery practices, and has established strong working relationships directly with its suppliers located in China.

Taking over from the due diligence predominately performed on our behalf by Yintec, a representative from Hamilton Marino regularly travels from Australia to China to inspect its factory partners in China in person, with these inspections typically occurring at least once every two months and are often carried out more frequently.

Where Hamilton Marino has been unable to inspect a factory or potential new supplier's factory personally, it has engaged a third party inspection company to do their own assessment on the factory and provide a factory inspection report to confirm that their practices are legitimate and above-board.

The **Appendix** to this Statement contains a summary of the factory inspections carried out by Hamilton Marino over the last year.

MEASURING EFFECTIVENESS

Hamilton Marino's monitors and measures the effectiveness of the actions it is taking to assess and address risks of modern slavery through both formal and informal auditing at various levels of its business. This is particularly effective at Hamilton Marino given the hands-on approach adopted by our directors, who are involved in each project through every stage of its life cycle, including procurement.

Subcontractor compliance questionnaires are required during tendering and engagement on our projects to ensure our subcontractor and suppliers maintain their awareness and vigilance against modern slavery practices. As these are required prior to start-up on every project, they are an effective tool at maintaining ongoing compliance.

Hamilton Marino's modern slavery working group works to implement and monitor its actions taken, including to ensure Hamilton Marino's effectiveness in combatting modern slavery practices.

Hamilton Marino is pleased to confirm that its actions taken have been effective and that it has not identified any instances or suspected instances of modern slavery throughout the year.

THE PATH FORWARD

We understand that, while it has not encountered any instances or suspected instances of modern slavery, it must remain vigilant against the risks of modern slavery practices. Into the future, Hamilton Marino will continue to focus on:

- utilising our modern slavery working group to implement and monitor our actions taken to address modern slavery risks;
- monitoring compliance throughout the business with our tender and engagement processes to ensure our requirements in respect of modern slavery risks are being adhered to;
- continuing and maintaining our desktop risk assessments of our suppliers;
- continuing to provide educational training to senior management and those overseeing procurement to improve staff awareness of modern slavery risk;
- continuing our learning and consultation with industry bodies, suppliers, and other stakeholders to develop best practice approaches;
- continuing our visits to our supply partners, particularly those located in China, to continually assess their work practices and ensure they uphold the ideals we expect in respect of modern slavery.

This Statement was approved by the board of directors of Hamilton & Marino Holdings Pty Ltd as the relevant principal governing body for Hamilton Marino in accordance with section 14 of the Act.



Matthew Green
Director
Hamilton Marino

August 2025

Appendix – Photos from Hamilton Marino factory inspections in China

Inspection of: Pinnacle Façade Window Factory

Address: 111 Baoying Road, Mingcheng Town, Gaoming District Foshan 528518 China.

Date: on or about 05/08/24- 07/08/24



Inspection of: Broad Window Factory

Address: No.,3,alley 4,sanzhou industrial district,Yagang street,Sanxiang Town, Zhongshan City, Guangdong Province.China .Post:528463

Date: on or about 05/08/24- 07/08/24



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Inspection of: TAWS Window Factory

Address: GuTang Road, DaWang High-Tech District, ZhaoQing City 526238, GuangDong Province, China

Date: on or about 05/08/24- 07/08/24



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Inspection of: Kete Windows Factory

Address: No.6, Chengyou Road, Danzao Town, Nanhai District, Foshan, Guangdong, China

Date: on or about 24/03/25 - 27/03/25



Inspection of: AIS Kitchens & Joinery

Address: No. 29, Lile Yongxing Street, Jianghai District, Jiangmen City, Guangdong, China

Date: on or about 24/03/25 - 27/03/25



Inspection of: Tivoli Joinery Factory

Address: Hanbian Village, Chaolang Industrial District, Chashan Town, Dongguan City, Guangdong Province

Date: on or about 24/03/25 - 27/03/25



Inspection of: Craftart Metal Factory

Address: No.1 Liansheng Street, Wusha Daliang Town, Shunde District, Foshan City, Guangdong Province, China.

Date: on or about 24/03/25 - 27/03/25



Inspection of: Buildhome Window Factory

Address: No.7, Jinxiu Road, Shunjing industrial park, Banfu Town, Zhongshan, Guangdong, China 528458

Date: on or about 24/03/25- 27/03/25



Inspection of: Zbom Joinery Factory

Address: No.1 Huainan North Road | Shuangdun Town, Hefei City, Anhui, China | 231100

Date: on or about 19/05/25-22/05/25



Inspection of: Kete Windows Factory

Address: No.6, Chengyou Road, Danzao Town, Nanhai District, Foshan, Guangdong, China

Date: on or about 19/05/25-22/05/25



Inspection of: Buildhome Joinery Factory

Address: No.7, Jinxiu Road, Shunjing industrial park, Banfu Town, Zhongshan, Guangdong, China 528458

Date: on or about 19/05/25-22/05/25

