



HALL GROUP  
MODERN SLAVERY STATEMENT  
FINANCIAL YEAR 2020



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# 1. 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.

This is Hall Groups first Modern Slavery statement and it describes their commitment to the requirements of the commonwealth Modern Slavery Act 2018 (cth), and has been developed in accordance with the requirements of the Modern Slavery Act 2018 (cth) guidelines.

The parent company of the Hall Group is Hall Holdco Pty Ltd which is the Reporting Entity for this statement.

## 2. Structure, Operations and supply chain

Entity	Structure	Operations	Supply Chain
<b>Hall HoldCo Pty Ltd (Parent Entity)</b>	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.
<b>Hall BidCo Pty Ltd</b>	Non-operating Australian Company	None	
<b>Hall Contracting Pty Ltd</b>	Australian Company	Halls Australian operating entity providing Dredging, Water & Tailing Solutions, Civil and Marine Civil services.	
<b>Hall Plant Hire Pty Ltd</b>	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.
<b>Hall Civil Contracting Pty Ltd</b>	Non-operating Australian Company	Engaged in select Civil Operations in South East Queensland	
<b>Hall Dredging Pty Ltd</b>	Non-operating Australian Company	Engaged in select Dredging Operations in Australian, South East Asia and the Pacific.	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.
<b>Hall CharterCo Pty Ltd</b>	Australian Company	Hall Equipment hire business. Hiring equipment to the Hall Group of operating entities.	
<b>Hall Plant Hire Pacific Pty Ltd</b>	Cook Islands Company	Hall Tug operations in the Pacific Islands	
<b>Hall Contracting SDN BHD</b>	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.	Halls payments to Suppliers in FY20 was in excess of \$120m across circa 350 suppliers including those provisioning long-term relationships, those under sub-contracted arrangements (typically short-term) and one off, low value goods and services.
<b>Hall Vanuatu Pty Ltd</b>	Vanuatu Company	Hall Vanuatu branch conducting operational activities in Vanuatu (no activity in FY20).	
<b>Hall Fiji</b>	Branch	Hall's Pacific Island headquarters. Established in Fiji to conduct marine civil and dredging services in Fiji.	Halls current business activities are predominately Australian based with >95% of supplies sourced from Australian based companies.
<b>Hall PNG</b>	Branch	Hall PNG branch conducting operational activities in PNG (no activity in FY20).	
<b>Hall Tuvalu</b>	Branch	Hall Tuvalu Branch conducting operational and business development in Tuvalu (no activity in FY20).	

### 3. 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.

Hall are in the process of seeking compliance with modern slavery legislation from suppliers through incorporation of the terms and conditions included within supplier, subcontractor, and/or consultancy agreements, and via the raising of purchase orders.

#### 3.1 Human Resources Assessment

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).

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.

## 3.2 Supply Chain Assessment

Hall have procured items such as dredge and machinery parts from suppliers in countries such as China, The Netherlands, Finland 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 2020 annual spend of greater than AUD \$1million.

Hall payments to Suppliers in financial year 2020 was in excess of \$120m across circa 350 suppliers including those provisioning long-term relationships, those under subcontracted arrangements (typically short-term) and one off, low value goods and services.

Hall current business activities are predominately Australia based with >95% of supplies sourced from Australian based companies.

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 and through the terms and conditions stated on Halls purchase orders.

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

## 4. Mitigating risk of Modern Slavery

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) and 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;

- a) Performing annual review of direct suppliers
- b) Performing a risk assessment on Halls supply chain to determine risk ranking.
- c) Sending out a mandatory Supplier Modern Slavery questionnaire to categorised 'high risk' suppliers to identify if any further action is required.
- d) Imbed due diligence processes for on-boarding certain 'risk graded' suppliers

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

**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.

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

## 5. Measuring effectiveness

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 business. 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.

Halls focus during the period has been on the development of the modern slavery framework and implementation of associated processes and procedures. As such, the company has not yet concluded on a structured approach for measuring the effectiveness of its actions in addressing modern slavery risks.

Hall's initiated a compulsory questionnaire for high risks suppliers which comprised of 17 questions directly relating to identifying the risk of modern slavery within these organisations. Following compilation of the responses and/or documentary evidence of compliance with requirements of modern slavery further investigations may eventuate that could contribute to the effectiveness of Halls actions in addressing modern slavery risks .

The objective in the next 12 months is to continue to implement improvements to the company's processes and procedures.

## 6. 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;

- Develop and implement a Modern Slavery Policy
- Inclusion of any mandatory modern slavery clauses in terms and conditions of purchase orders.
- Inclusion of any mandatory modern slavery clauses in major subcontract agreements and any other relevant procurement contracts.
- Modern slavery training for relevant staff in finance/ procurement and human resources roles.
- Internal training on Modern Slavery and the human rights policy to be included in the onboarding induction process for new employees.
- All policies reviewed and modern slavery clauses added where applicable.

## 7. Consultation with other Hall entities

Whilst reporting was led by the parent entity, each of the entities have been engaged in the detection process of assessing operational and supply chain exposures.

With the objective in the next 12 months to finalise the development of and implement the modern slavery policy, the Policy will apply to all directors, senior management and employees at every level of Hall, and will form part of the onboarding and training process.

## 8. 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.



## 9. Approval

Approved by Hall's Group Board of Directors, dated 25 March 2021

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

A handwritten signature in black ink, appearing to read "Cameron Hall".

**Cameron Hall**  
CEO  
25 March 2021