

# Modern Slavery Statement

Financial Year 2022 - 2023



## **03. Introduction**

## **04. Our company**

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

## **06. 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

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# / Introduction /

At HT1, we are led by our commitment to uphold honest, fair, and transparent business practices that allow us to make a positive and meaningful difference in our community and industry. Modern slavery, in all its forms, has no place within our operations, supply chains, and business partnerships.


FY22/23 was a year to continue our learnings, building on the progress made in FY21/22.

We are focused on further understanding modern slavery risks within our supply chains, particularly on workers within the construction industry, and the sectors who support and build our assets. This has involved working with our suppliers and gaining transparency on their procurement and labour practices.

Modern slavery exists in every country and across most industries. As an Australian builder, we acknowledge that our business operates within a high-risk industry. The impact of factors such as long and complex supply chains, tight margins and strict timelines, the use of raw materials and high rates of unskilled labour combine to render the building and construction industry particularly prone to modern slavery risks.

As this Statement demonstrates, we reaffirm our commitment to long-term continuous improvement within our operations to ensure that we are contributing to the collective goal of ending modern slavery.

**This Statement was approved by the Harris HMC Board of Directors on 20 December 2023. The Statement was approved on behalf of the joined reporting entities.**



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, Harris HMC Construction (VIC Major) 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 with 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 HT1 Group business address is 52 Henderson Street, North Melbourne, VIC 3051. We employ 257 staff under permanent, fixed term, part time and casual contracts, or under enterprise agreements.

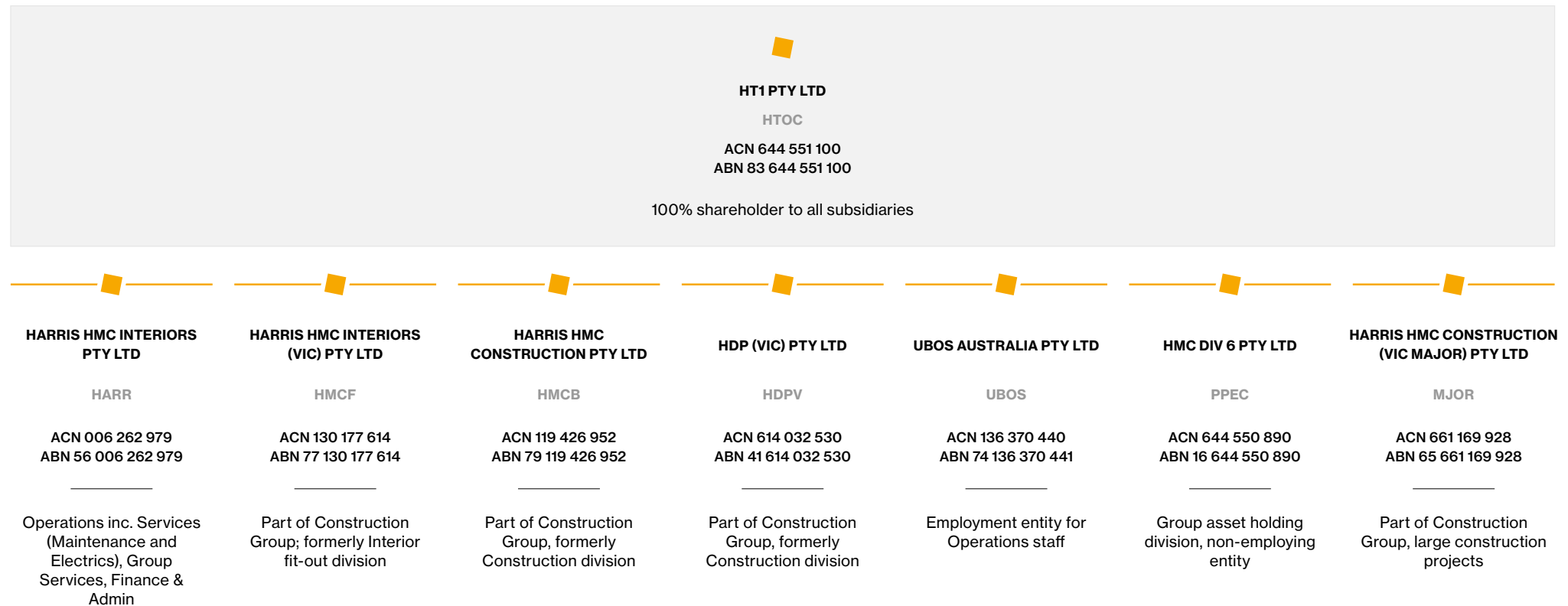
All items outlined within this Statement are applicable across all entities; from the initial risk-scoping exercise conducted with the assistance of external partners, to the Supply Chain Assessment and subsequent risk-reduction policies and procedures.

## Reporting period

The HT1 Group operated on the 2022/2023 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 directly employs staff in numerous roles including Construction Managers, Project Managers, Site Managers, Contract Administrators, Project Coordinators, Estimators, Design Managers, and Construction Workers, with all employees engaged under Workplace Agreements, relevant awards, and/or individual agreements.

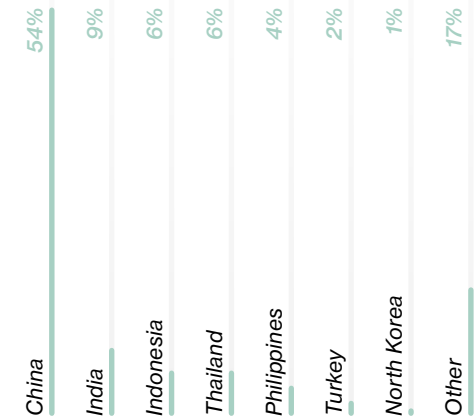
The HT1 Group believes that the risk of modern slavery within our workforce is minimal. This is because all our employees are based in Australia, a country with one of the lowest global prevalence scores for modern slavery.

## Suppliers

The HT1 Group acknowledges that the risk of encountering modern slavery practices within our supply chain is higher compared to our internal operations. Our ongoing efforts are focused on gaining a deeper understanding of these potential risks.

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

In 2022, The HT1 Group completed our second modern slavery assessment of our suppliers. Our subcontractors and suppliers were then invited to participate in the Informed 365 (Property Council Consortium) Modern Slavery Assessment, enabling The HT1 Group to collect additional information on their approach to managing modern slavery risk.



**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 follows a robust methodology for identifying, mitigating, and remediating modern slavery risks, and assessing the effectiveness of these actions.

To support our approach to managing modern slavery risks at HT1, we are establishing a comprehensive set of policies and procedures that articulate our values, ways of working and expectations of employees and suppliers. These documents will ensure that our employees and suppliers clearly understand our expectations, commitments, and processes.

## Industry collaboration through a single online platform

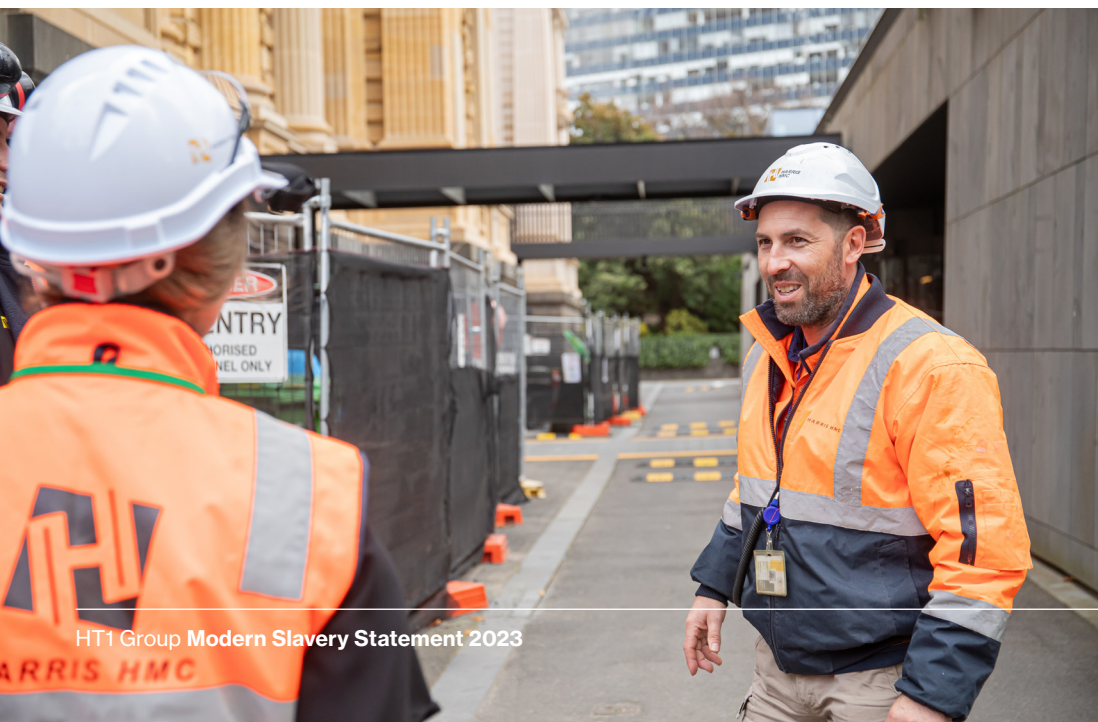
During this reporting period, we became part of Informed365, Property Council of Australia consortium, aiming to enhance collaboration with our subcontractors and suppliers. This initiative focuses on streamlining and improving our data-gathering processes for mutual benefit. Membership of this group has provided HT1 Group with opportunities to collaborate with industry participants to increase awareness and understanding of modern slavery, educate our subcontractors and suppliers, and contribute to a broader, industry-wide response to reducing risks and incidences of modern slavery.

While joining Informed365 has significantly improved our subcontractor/supplier data collection process, it hasn't completely resolved all the challenges we faced previously. Throughout this reporting period, our response rate recorded on the Informed365 platform has remained low, and subcontractors and suppliers appeared largely unresponsive to our reminder prompts. As the reporting period concluded, our response rate was lower than initially anticipated. In the upcoming reporting period, we plan to enhance supplier engagement by directly interacting with higher-risk subcontractors and suppliers to improve participation.

## Supplier engagement and education

The supplier portal facilitates collaboration within the industry, enabling HT1 to invite our identified suppliers to complete a questionnaire. This process aims to provide insights and transparency into our supply chain, supporting informed decision-making in supply chain management. The primary goal of the platform is to alleviate the administrative burden on suppliers, shared suppliers, and platform members. It also seeks to promote industry-wide supplier education, minimise costs for suppliers, and enhance transparency across the industry for both platform partners and suppliers.

In addition to these benefits, suppliers using the platform gain access to relevant free online educational resources within each section. They can track their progress in actions and responses year on year. The implementation of a standardised platform across the industry is strategically focused on improving reporting efficiency to foster greater transparency within the supply chain.



**Further actions undertaken in the last 12 months**

Modern Slavery training now forms part of our compliance suite and is issued to all new employees as part of our onboarding process. 17 employees completed the training during this reporting period.

Developed a code of conduct, pending approval by senior management, which will be implemented over the next 12 months. This code establishes clear guidelines on ethics and relationships, safeguarding the reputation and interests of HT1 and our stakeholders, and governing the conduct of every employee.

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

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

The HT1 Group requires that all recruitment and labour hire agencies with whom we engage adhere to the following commitments before providing any additional services:

- No fees are paid by workers placed within our organisation.
- The organisation is certified under the Labour Hire Licensing Bill 2017.

Contracts of employment or engagement are in place with workers, and copies of these contracts are readily available.



# / Assessment /

*Describe how the reporting entity assesses the effectiveness of these actions*

## Mitigation and remediating risks associated with modern slavery

Continuous improvement and assessing the effectiveness of our actions to identify and address modern slavery risks in our operations and supply chains is a key element of an effective response to modern slavery.

Our methodology, risk assessment, supplier due diligence and other actions taken to address the risks of modern slavery in our operations and supply chains will be subject to ongoing reviews as we continue to improve and evolve our processes for addressing modern slavery risks.

The HT1 Group's strategy to combat modern slavery encompasses the following planned initiatives, which will be detailed in future reports.

<b>Collaboration</b>	Continue industry participation and collaboration through the Property Council of Australia's (PCA) Modern Slavery working group and other industry experts
<b>Modern Slavery Statement Review</b>	Working with the PCAs Modern Slavery Working Group, to ensure this statement meets current standards
<b>Training</b>	Implementation of new HT1 company wide compliance and learning management system
<b>Modern Slavery Working Group</b>	Establish a HT1 Group Modern Slavery Working Group
<b>Risk Assessment</b>	Annual risk assessment of our supply chain and continue developing our supply chain knowledge to improve our understanding of supplier responses
<b>Supplier Due Diligence</b>	Ongoing supplier due diligence with a focus on: <ul style="list-style-type: none"> <li>Increasing the number of invited suppliers utilising our existing risk methodology</li> <li>Increasing participation rates and working with suppliers to improve supplier responses</li> </ul>
<b>Procedural Review</b>	Establish a procedure for addressing allegations of modern slavery within our supply chain
<b>Supplier Pre-qualification</b>	Implement a process where key suppliers complete a modern slavery assessment as part of the procurement and onboarding process

# / Consultation /

*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)*

HT1 Pty Ltd is dedicated to creating and upholding a comprehensive, organisation-wide strategy to combat modern slavery. This report was developed in collaboration with our Finance and People & Culture Departments.

The collaborative effort included evaluating the varying risks of modern slavery within the organisation, conducting a group-wide risk assessment, outlining an action plan for the upcoming reporting period, and evaluation of the statement's content.

The board of HT1 Pty Ltd, acting as the primary governing body, approved this statement on 20 December 2023.



Andrew Headberry  
Managing Director



Dale Kennedy  
Director



Geoff Dart  
Director



Arthur Kennedy  
Director



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Modern Slavery Statement 2023

***HARRIS HMC***

HT1 Group

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