



Modern Slavery Statement

For the period 1 July 2024 to 30 June 2025

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This statement is made and published jointly on behalf of HPX Group Pty Ltd (ACN 621 014 515) and its subsidiaries pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) for the period 1 July 2024 to 30 June 2025 (**Reporting Period**). Where we refer to “we”, “our”, “us” and “Group” in this Statement, it means HPX Group and all Australian entities owned, operated or controlled by HPX Group.

Acknowledgement of Country

We would like to acknowledge the traditional custodians of the lands on which we live and work. We pay our respects to the Elders of these lands, both past and present, and extend that respect to all Aboriginal and Torres Strait Islander Peoples and First Nations Peoples globally.

Introduction

At HPX Group, we are aware that modern slavery is a serious global issue. We understand that we have a responsibility to take all practical steps we can to ensure that our operations and procurement activities are free from forced labour, exploitation, and other forms of slavery.

This Modern Slavery Statement outlines our progress and ongoing commitment to addressing modern slavery risks within our business operations and supply chains during the new Reporting Period. Building upon the foundations established in our first Statement, we continue to refine our practices, deepen our understanding, and implement effective measures to mitigate these risks and contribute to the global effort to eradicate modern slavery.



Our Structure, Operations and Supply Chains

Structure and Operations

HPX Group Pty Ltd is the holding company for the following employing subsidiaries:

- Hamilton Locke Pty Ltd
- Source Services Pty Ltd
- Source IP Pty Ltd
- Source Governance Pty Ltd
- Source Compliance Pty Ltd
- Helios Salinger Pty Ltd
- Materra Pty Ltd
- Halo Operations Pty Ltd

Through these entities, HPX Group's core business function is to provide specialist legal and other professional services to clients in Australia and globally through four main services lines:



Hamilton Locke is one of Australia's fastest-growing law firms, with our 'people first' culture the foundation on which we have built our business. We provide a range of corporate and commercial legal services to corporate and private clients, spanning M&A, Capital Markets, Banking and Finance, Energy and Resources, Construction, Litigation, Private Wealth, Property, Technology and IP and Workplace and Employment. We also provide pro bono legal services, and our people participate in a range of initiatives to contribute to the community in positive, sustainable and meaningful ways.



Our Source teams provide businesses of all sizes with on-demand, tailored in-house legal, HR, governance, risk and compliance, and intellectual property and trademark services. Source also provides specialised, expert-led training, both online and in-person, along with digital products to help our clients improve and enhance their operations.



Our Helios Salinger team comprises Governance, Risk and Compliance (GRC) specialists in privacy, AI and data governance. We offer expert consulting advice to government, the non-profit sector and businesses across Australia, delivering tailor-made solutions to strengthen their privacy law compliance and pro-actively manage risk. Helios Salinger also provides specialised, expert-led training, both online and in-person, along with digital products to help our clients improve and enhance their operations.



Matterra is a sustainability consultancy that helps organisations navigate the complex and dynamic ESG regulatory landscape. Matterra exists to give companies confidence in their sustainability performance by providing support with all aspects of ESG strategy, development, reporting and compliance. From mandatory climate reporting to modern slavery and governance, Matterra helps organisations navigate the ever-changing regulatory landscape and build a business that's robust, resilient and ready for the future.

Further information about HPX Group entities and their services can be found on [our website](#).

Our operations are centred around empowering exceptional people to provide high-quality professional services to our clients. Our workforce delivering those services comprises highly skilled legal and other corporate professionals, supported by centralised embedded teams across operations, technology, finance, HR, business development and marketing. As at the end of the Reporting Period, HPX Group employed 532 people on a full-time, part-time and casual basis. We maintain offices in five locations across Australia, in Sydney, Melbourne, Brisbane, Perth

and Newcastle, and encourage flexible and hybrid working arrangements where possible, to meet the mutual needs of our employees and our business.

HPX Group has entered into a licensing arrangement with Hamilton Locke (NZ) Limited (Company No. 8463155) (Hamilton Locke NZ) which provides Hamilton Locke NZ with the exclusive use of the "Hamilton Locke" and "Source" brands in New Zealand. Hamilton Locke NZ is not owned or controlled by HPX Group, and is therefore not required to (and is not included in this) report for the purposes of the Modern Slavery Act.

Supply Chain

HPX Group entities provide legal and other professional and consultancy services directly to end users (our clients), being principally medium and large corporations and government entities.

During the Reporting Period, HPX Group procured products and services from over 800 direct suppliers to support our business operations and the provision of our services.

Other than employee remuneration, our key supply chain categories (by spend) are:

- **Property** – Rent and rates.
- **Information technology** – Computer and telecommunications hardware, software, cloud services and outsourced IT services and contractors.
- **Business and property services** – Insurance, facilities management, furniture, printing and office supplies, couriers, consumables and other business operating expenses.
- **Travel** – Managed travel services, flights, hotels and car hire services.
- **Professional services** – Professional development and training, marketing and business development services, recruitment services, knowledge services, legal services and outsourced business support services.
- **Hospitality and entertainment** – Catering, entertainment and supplies for internal and external events, client engagement activities and employee development initiatives.

Our supply chain is highly service-oriented and built around professional expertise, technology, and operational needs. This makes it distinct from traditional supply chains that centre around manufacturing or retail. Managing our type of supply chain effectively requires a focus on building and maintaining strong partnerships with providers who understand the high ethical standards and regulatory requirements of the legal and broader professional services industries.

Approximately 92% of our business spend is within Australia, with overseas spend largely confined to obtaining legal advice in foreign jurisdictions, or consulting services and specialised software products from suppliers based in 27 countries (including the United States, United Kingdom, Canada and New Zealand). In the Reporting Period, our largest overseas expenditure was with Elevate Services Inc., a US-based company which provides HPX Group with business support services, utilising workers who are predominantly located in the US, India and the Philippines. Both India and the Philippines have an elevated modern slavery risk profile; however, Elevate Inc. employs highly skilled workers and has implemented a modern slavery framework, demonstrating their commitment. You can access their [modern slavery statement here](#).

Our overseas suppliers' countries of origin have diverse rankings in prevalence of, and vulnerability to, modern slavery. Of the countries from which we sourced services during the Reporting Period, Saudi Arabia, United Arab Emirates, India and the Philippines presently have the highest risk. However, as the services we obtained from these suppliers related to legal and other professional services, we consider the risk of modern slavery associated within this area of our supply chain to be low.

Identifying and Assessing Modern Slavery Risks

Changes in Operations

During the Reporting Period, the primary significant changes to our operations were:

- the acquisition of Helios Salinger Pty Ltd; and
- the relocation of our Sydney, Perth, Brisbane and Melbourne premises.

We do not consider that these operational changes impacted the risk of modern slavery in our operations or supply chains.

Identifying Modern Slavery Risk in our Operations and Supply Chain

We use a risk-based methodology to identify, assess and prioritise modern slavery risks across all HPX Group services, locations and procurement categories.

In conducting our modern slavery assessments, we:

- evaluate each procurement category to determine potential modern slavery risks, and compare against key risk indicators to pinpoint immediate areas of concern within our supply chain; and
- continuously review and evaluate our business operations to identify and address any practices, policies, or procedures that could be strengthened to improve the way our organisation manages and responds to modern slavery risks and other forms of exploitation.

Assessing our Modern Slavery Risk

In assessing our overall risk of Modern Slavery, we consider the following factors:

Business operations and locations: HPX Group is owned and operated within Australia. The Walk Free Global Slavery Index (GSI)¹ considers Australia to have a low prevalence of modern slavery, with a high level of government response to addressing modern slavery issues and concerns through legislation and business compliance requirements. The services which HPX Group provides also operate within heavily regulated industries. Our business operations are supported by a suite of policies and processes embedding anti-slavery practices, and the nature of the services we provide means our practices, processes, contracts and governance are grounded in a strong foundation of legal and regulatory compliance.

Supplier products, operations and locations: Most HPX Group suppliers are located within Australia and many of our suppliers provide professional services in highly regulated or high-skill base industries. Most of our suppliers have a low risk of modern slavery; however, we have identified some suppliers who provide products or services that present higher modern slavery risks (refer to Key Risk Areas).

People recruitment and employment: The HPX People team manages our employment and recruitment, ensuring we comply with all relevant employment laws and regulations, and that our people-centred practices, processes and policies align with International Labour Organisation conventions and other human rights guidelines. All of our employees (with very rare exceptions for employees who may be temporarily based overseas, for example) are located in Australia, which has a low prevalence of modern slavery practices. We confirm all foreign workers' right to work in Australia and we do not hold any original personal documentation (such as passports or birth certificates) during their employment (or at any time).

Industry/Sectors: The legal and professional services industries are highly regulated and primarily comprised of highly skilled workers. We are aware of the increased risk in the legal sector in respect of culturally embedded excessive work hours; we ensure our employees are appropriately remunerated for any overtime or work conducted outside of their standard working hours, in accordance with their employment contracts and Australian labour relations legislation. We also provide our employees with meals and transport home if they are working late, and our People and Senior Leadership teams conduct mental health wellbeing checks on any employee who is noted as working excessive hours.

Based on this assessment of our business operations and supply chain, we consider the risk of modern slavery in our supply chain to be low.

1 Global Slavery Index 2023 <https://www.walkfree.org/global-slavery-index/map/>

Key Risk Areas

Although we consider our modern slavery risk to be low, we have identified the following areas of our business operations and supply chain that may be vulnerable to modern slavery:



Facilities management

These services carry a higher potential risk of modern slavery as the workforce may include short-term and migrant workers who are considered to be more vulnerable to exploitation. Cleaning work in particular is a high-risk service sector in Australia (and elsewhere) as labour conditions can be obscured and the low-skill nature of the work opens employment to vulnerable workers.



Offshore business support services

HPX Group utilises offshore business support services with a supplier that provides these services from India and the Philippines. These geographic locations have a high prevalence of modern slavery, with a number of risk factors that contribute to vulnerable populations.



Technology and Hardware

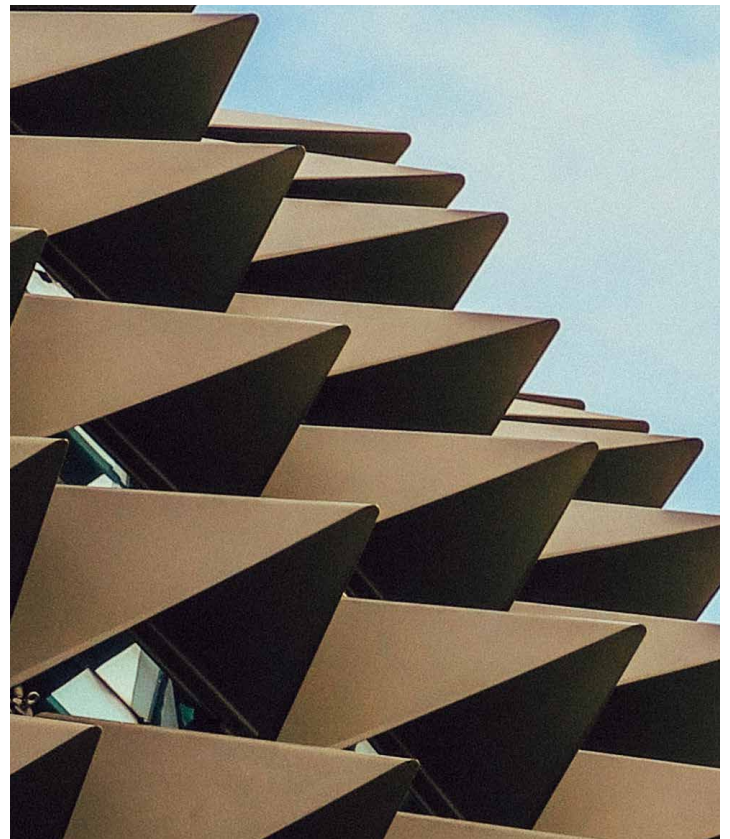
The electronics industry has long, complex supply chains with known modern slavery risks in the raw material stage. Electronics purchased and used by HPX Group are often products that originate from multi-tiered supply chains, which presents challenges in understanding and being able to address the modern slavery risks further down the chain.



Hospitality, entertainment and catering services

The hospitality and entertainment industries frequently employ workers from some of the most vulnerable sections of society, including contract or temporary workers, migrant workers, women and young people. These industries often operate with tight profit margins, encouraging the use of low-cost labour and exploitative working and employment practices, such as underpayment, excessive working hours and unsafe conditions.

As well as the above key risk areas, we recognise that our supply chain extends well beyond our immediate suppliers and there may be an increased risk of modern slavery occurring further down the chain. We are aware that certain sectors, products, services, industries, geographic locations, and supply chain models pose a higher risk of modern slavery and, although we conduct thorough due diligence on our tier 1 suppliers, we acknowledge that our visibility diminishes with lower tiers of the supply chain. We are designing our modern slavery risk mitigation strategies holistically to ensure we consider this risk factor in every stage of our modern slavery response plan.



Addressing Modern Slavery Risks

Our approach to responding to modern slavery risks is grounded in the *United Nations Guiding Principles on Business and Human Rights*, and centres on identifying risks to people, rather than to the business. With the full support of all HPX Group entities, we have developed a Group-wide approach to addressing modern slavery risks that focuses on addressing the most severe risks to people first.

We have continued to build on efforts and the work undertaken in the previous reporting period to strengthen our modern slavery risk management processes.

Modern Slavery Response Framework and Action Plan

In this Reporting Period, we formalised our approach to addressing modern slavery risks in our supply chain and operations by developing and implementing a Modern Slavery Response Framework and 3-year Action Plan. The Framework is designed to identify key areas of our business operations critical to supporting modern slavery mitigation efforts so we can align our future actions to make our practices, policies, and procedures in these areas more effective. It is structured around the following four key categories:



Our 3-year Action Plan includes specific, actionable tasks assigned to each of these categories, supporting a structured and measurable approach to addressing modern slavery across our operations and supply chain.

Policies and Procedures

Our Modern Slavery Policy outlines our approach to identifying, preventing and addressing modern slavery risks and sets out our expectations of employees, contractors and suppliers in relation to compliance with the policy, modern slavery due diligence efforts and reporting requirements.

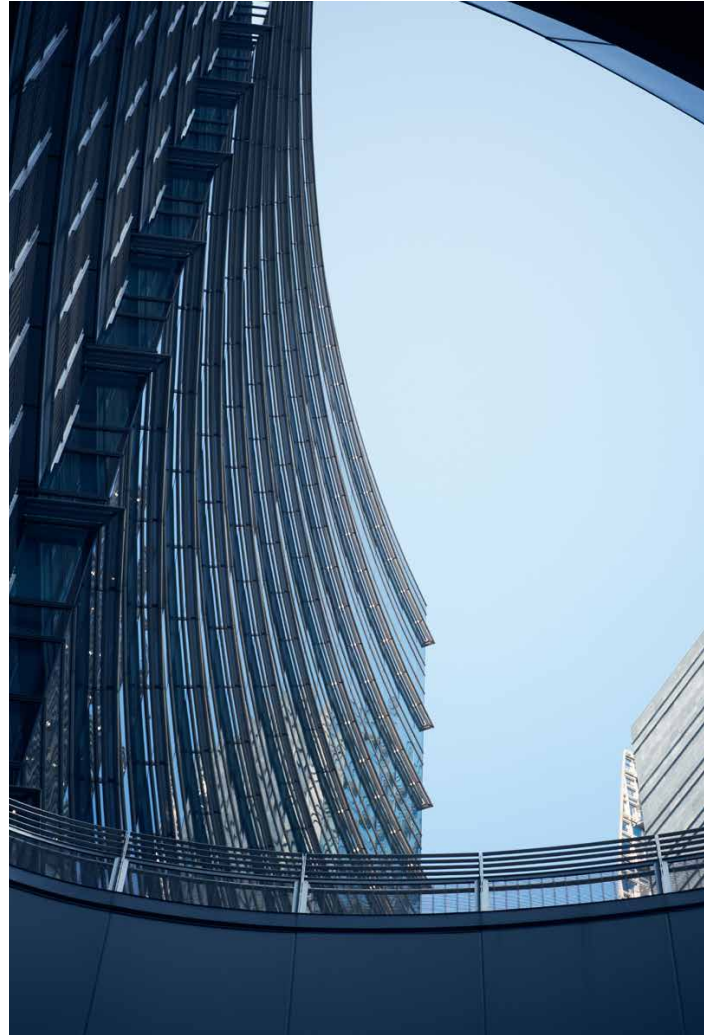
Our Modern Slavery Policy is supported by the following policies:

- Whistleblower Protection Policy.
- Workplace Health and Safety Policy.
- Equal Employment Opportunity Policy.
- Domestic and Family Violence Policy.
- Parental Leave Policy.

These policies are made available to employees through our intranet portal.

During the Reporting Period, we finalised and launched a number of new policies designed to strengthen and improve our ability to identify, assess and mitigate modern slavery risks in our operations.

- **Anti-Bribery and Corruption Policy:** This policy strictly prohibits bribery and corruption in all its forms and promotes transparency and ethical practices. The policy provides clear channels for reporting unethical behaviour and encourages our employees to safely and confidentially report any unethical practice, including modern slavery or any behaviour that may contribute to modern slavery.
- **Procurement Policy:** Our procurement policy provides additional guidance on modern slavery risks and ethical and responsible sourcing practices. Included in the policy is our newly developed supplier risk assessment process, specifically designed to identify suppliers and products with an increased risk of modern slavery.
- **Code of Conduct:** This policy outlines the ethical, inclusive and respectful behaviours expected of all HPX Group employees and prohibits any behaviour that causes or contributes to unfair treatment, unsafe working conditions and exploitation. The policy also provides a number of ways for employees to report conduct violations, including anonymous and confidential reporting channels through our grievance mechanisms.



In the next reporting period, we intend to:

- explore the development of a broader Responsible Business Practices or ESG Framework to formalise and structure our approach to corporate social responsibility;
- broaden the scope of our Whistleblower Protection Policy to ensure external stakeholders can access our confidential reporting channels; and
- develop a modern slavery clause to be included in all new supplier contracts, to ensure we are explicit in our requirement that all suppliers must not engage in exploitation, human trafficking and modern slavery.

Ethical and Responsible Sourcing of Products and Services

Our supplier selection and management process consists of due diligence and risk assessments that consider the risk profile of the supplier and ensures compliance with laws and ethical standards, including the absence of modern slavery. If we identify any concern about a supplier’s ability to meet our standards, or if their business does not align with HPX Group’s goals and values, we exclude them from selection.

During the Reporting Period we finalised and launched an improved modern slavery due diligence framework to foster supplier engagement and assist us in undertaking supply chain investigations. The improved framework includes the following policy and procedures:

- **Supplier Code of Conduct:** This document is provided to all new material suppliers prior to any formal engagement and communicates the ethical standards and expectations that we require our suppliers to adhere to in their business practices. It provides contact information for our suppliers if they need to report any non-compliance with the code.
- **Supplier Database:** We have implemented a new expense management platform that has improved our visibility of our supplier base and facilitates accurate and up to date reporting.
- **Improved Due Diligence for Prospective Suppliers:** HPX Group employees engaged in procurement activities can now submit details of their potential supplier and procurement scope to the Risk and Compliance Team for an initial modern slavery risk assessment. The outcome of this assessment informs the level of supplier due diligence required and excludes potential suppliers that present with unacceptable modern slavery risk factors.
- **Modern Slavery Questionnaire and Assessment:** Our modern slavery questionnaire is provided to suppliers for the purpose of identifying and assessing potential risks of modern slavery within their supply chain and business operations. The questionnaire was designed using a risk-based methodology, with a risk scoring and ratings system. Using the risk score and qualitative analysis of responses, we make an overall assessment of the supplier’s modern slavery risk, assigned as High, Moderate or Low Risk. The questionnaire and risk assessment considers the following key factors:

Product and Service Assessment

The type of product or service being procured.

The sector or industry the product or service is being procured from.

The geographic location the product or service is being procured from.

The supply chain model, including its intersection with legal, social, or environmental issues affecting production or logistics.

Supplier Assessment

The status of the supplier as a reporting entity under the Modern Slavery Act and the presence of accessible Modern Slavery Statements.

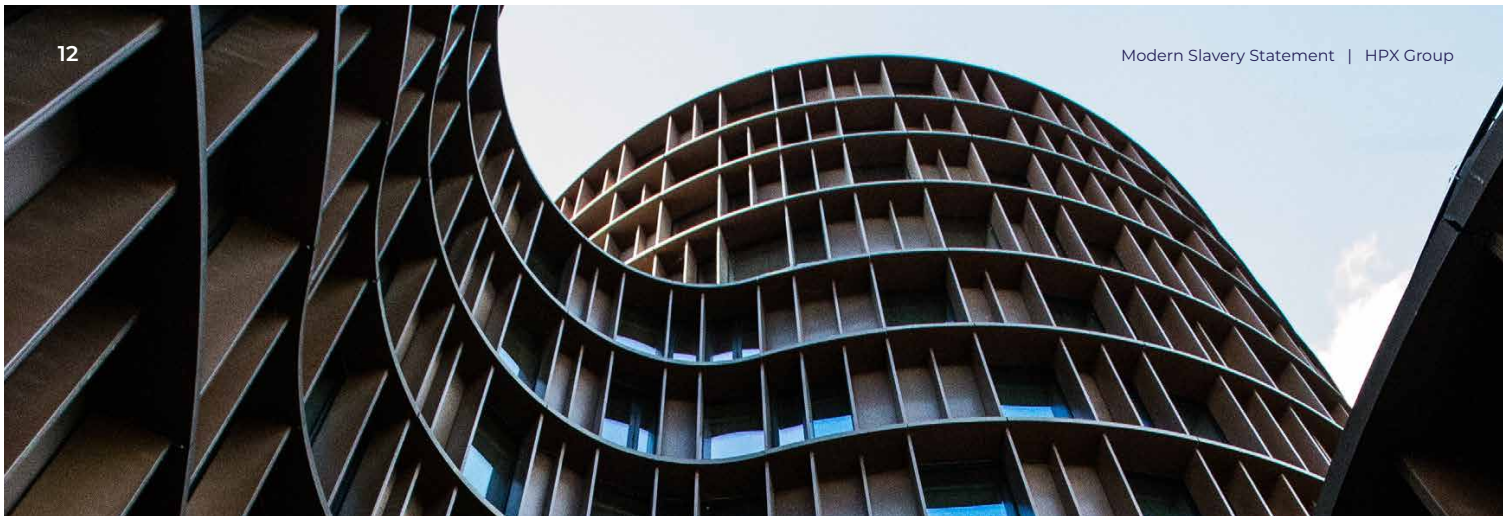
The supplier’s procurement due diligence practices and self-reported visibility of their supply chain.

The supplier’s business practices and operations, including modern slavery related policies, procedures, training and supplier due diligence practices.

The supplier’s employment and treatment of their workers, including the type of workers employed, payment and awards and whether they hold workers’ original documentation

In the next reporting period, we intend to:

begin developing ethical sourcing guidelines with defined criteria for key procurement categories. These guidelines will equip employees with clear, actionable information to support responsible and informed decision-making, ensuring supplier selection and purchasing align with ethical and sustainable standards.



Supply Chain Engagement

Following the launch of our improved supply chain due diligence procedures, HPX Group engaged with our critical and high-risk tier 1 suppliers to assess the modern slavery risks associated with their businesses, operations and products or services.

During the Reporting Period, 46% of critical suppliers and 23% of suppliers providing a high-risk product or service responded to our modern slavery questionnaire. Of those who responded, only one supplier was identified as high-risk. This supplier operates in a high-risk industry and has not yet implemented policies, procedures and employee training to address the modern slavery risks present in their operations and supply chain. We intend to work with this supplier over the next reporting period to improve their approach and commitment to addressing modern slavery risks.

In the next reporting period, we intend to:

- improve our response rate to the modern slavery questionnaire for suppliers; and
- develop a standardised follow-up and remediation procedure to address those suppliers identified as moderate or high-risk, or those whose questionnaire responses require further investigation or clarification.

Training and Awareness

We recognise that educating our employees to recognise the signs of modern slavery is a crucial step in our ability to take action, individually and collectively as a business. Employees who are educated about modern slavery are better equipped to identify red flags within supply chains, subcontracted services, and even internal operations. Building awareness and fostering vigilance will empower our employees to take immediate action or report concerns so that we may address modern slavery risks quickly and pro-actively.

During the Reporting Period, we finalised and required our employees to complete our mandatory internal modern slavery training module. This training module informs employees on ways they can address modern slavery in their day-to-day lives and encourages them to report concerns about modern slavery in HPX Group operations using our risk reporting function or through our Whistleblower Protection Policy.

We will continue to raise awareness and provide ongoing education and training to our employees on how to recognise and take action. This includes running our internal training module every two years to ensure all new employees are informed about modern slavery risks and the policies and processes we have in place to ensure our business practices remain free from modern slavery.

In the next reporting period, we intend to:

- deliver targeted, tailored training to employees involved in procurement practices to ensure they fully understand our procurement values, strategies, processes, and reporting procedures related to modern slavery risk assessments for suppliers;
- strengthen awareness of our grievance mechanisms to ensure all employees feel informed about the available avenues to report concerns (and safe and supported in doing so), including modern slavery risks or other unethical behaviour; and
- re-evaluate our modern slavery learning strategy to create new opportunities for learning and engagement.

Evaluating Effectiveness of our Actions

During the Reporting Period, we received no reports from internal or external stakeholders indicating instances of modern slavery associated with our business practices or direct suppliers.

We are confident that our existing internal policies and processes are effective in minimising modern slavery risks. We remain committed to strengthening our framework and maintaining transparency to address risks.

This includes continuing to measure our progress against, and update where necessary, our Key Performance Indicators (KPIs). We developed KPIs during the Reporting Period to track and measure the effectiveness of our actions. These KPIs relate to:

- the number of critical and high-risk suppliers completing our modern slavery questionnaires;
- the number of employees completing modern slavery training; and
- completion of action items from our 3-Year Modern Slavery Action Plan.

We regularly review KPI achievement, and review our modern slavery framework annually as part of our regular risk and compliance processes. The General Counsel and Risk and Compliance team have primary responsibility for reviewing our modern slavery systems and procedures to ensure they are effective in identifying and addressing any identified risks of modern slavery in the Group's supply chain.

As we continue to implement actions to address modern slavery, we will explore additional data and metrics to develop corresponding KPIs that allow for comprehensive evaluation of the effectiveness of our initiatives.

Consultation and Board Approval

Our Risk and Compliance team prepared this Statement in consultation with representatives from our Executive, Finance, People and Technology functions.

Representatives of each HPX Group subsidiary with knowledge of the relevant operations and supply chains were actively engaged and consulted to identify, assess and address the modern slavery risks in HPX Group's operations and supply chain, and the preparation of this Statement. The Board of each HPX Group subsidiary has been given the opportunity to review this Statement and provide feedback. This Statement has been approved by the Board of HPX Group, and is signed by Nicholas Humphrey in his role as Chief Executive Officer.

Signed by **HPX GROUP PTY LTD ACN 621 014 515**



A stylized, handwritten signature in black ink, appearing to be 'N. Humphrey'.

Nick Humphrey
Director

18 December 2025

