

Modern Slavery Statement

1 July 2023 – 30 June 2024

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HEALTHCARE:
Macquarie University – Woolcock
Institute of Medical Research

INTRODUCTION

Founded in 1979, Hindmarsh offers specialised construction solutions, with a focus on complex construction projects.

Hindmarsh has a vision of creating leading communities, sustainable buildings and social infrastructure for the future. Hindmarsh delivers projects for a wide range of clients throughout Australia, with a commitment to safety, high quality, integrity, innovation and team work.

For a portfolio of Hindmarsh's work, please visit our website: www.hindmarsh.com.au

Hindmarsh takes its role seriously as an industry leader on ecologically sustainable development, investing in initiatives to improve sustainability and waste management on all its building and development projects.

Hindmarsh is a member of the Green Building Council of Australia and has a strong building portfolio of 5 and 6 Star energy efficient developments. Further, Hindmarsh has an employee wide charity program and actively supports cultural life in Australia.

Hindmarsh Values



Integrity

Maintaining strong ethics, valuing honesty and cementing our reputation for transparency and accountability.



Safety

Creating a healthy and safe working environment for employees, clients, and communities.



Innovation

We are progressive and break new ground, finding better ways and being resourceful. We think differently and take calculated risks.



Teamwork

Building friendship and trust, pulling together, and helping each other out.



Quality

Going the extra mile and taking pride in our work to deliver the best possible results.

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THIS STATEMENT

This is Hindmarsh's fifth modern slavery statement pursuant to the Modern Slavery Act 2018 (Cth) and is for the reporting period of 1 July 2023 to 30 June 2024.

During the reporting period, Hindmarsh expanded on its due diligence procedures by introducing a modern slavery questionnaire and strengthened its policies, procedures and governance processes to create a strong foundation for its modern slavery compliance framework. We continue to evolve our modern slavery compliance framework and in this statement we set out our continued actions to address modern slavery risks.

Hindmarsh is aware that modern slavery prevalence continues to rise, particularly with international events such as wars, climate change induced disasters and broader conflicts putting vulnerable populations at risk. Hindmarsh continues to be committed to evolve our overall modern slavery due diligence framework to ensure that we continue to assess risk with regarding to modern slavery in our supply chains.

We set this out in our fifth modern slavery statement, including the actions we have taken, the progress made, and our goals for future reporting periods.

This statement was approved by the Board of Hindmarsh Construction Australia Pty Ltd and its subsidiary HCA Queensland Pty Ltd.



John Hindmarsh
Chairman

Date: 18 December 2024



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CRITERIA 1: REPORTING ENTITY

Joint Reporting Entities: Hindmarsh Construction Australia Pty Ltd ACN 126 578 176 (HCA)
HCA Queensland Pty Ltd ACN 629 849 814 (HCAQ)

Head Office: Level 1, 41/65 Constitution Avenue, Campbell ACT 2612

Website: hindmarsh.com.au



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CRITERIA 2:

STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Structure

The reporting entities for the purposes of this joint statement are HCA and HCAQ (collectively referred to as “Hindmarsh”).

- HCA – is a private company operating in the Australian Capital Territory, New South Wales and South Australia. HCA is a construction company.
- HCAQ – is a wholly owned subsidiary of HCA which operates solely in Queensland. HCAQ is a construction company.

There are other non-operating entities within the Hindmarsh group which are not reporting entities or otherwise captured, under this statement.

Hindmarsh is supported by an Advisory Board consisting of the Hindmarsh family which oversees our compliance and governance obligations. Our Leadership Team then drives our day-to-day operations.

In terms of modern slavery compliance, the Director provides general oversight over our modern slavery compliance framework and our Modern Slavery Working Group. The Modern Slavery Working Group directly reports to the CEO who is then responsible to the Director.

Operations

Hindmarsh delivers top quality business-to-business and community-focused solutions for its clients. With a commitment to safety, high quality, integrity, innovation and teamwork, Hindmarsh delivers to a wide range of clients throughout Australia.

Hindmarsh specialises in project and construction management for local, national and international clients.

Hindmarsh’s work expands over different sectors, including:

- Commercial and residential high-rise;
- Infrastructure;
- Education;
- Industrial;
- Sporting;
- Health; and
- Government.

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Locations

Hindmarsh operates predominantly across the eastern seaboard of Australia. Our operating locations are as follows:



HCA and HCAQ have over 266 employees, with a common director overseeing the entities. The same director and executive leadership team oversee the entities, with the same policies and procedures applying to both entities.

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Supply Chains - Overview

Our suppliers are critical to our business and enable us to carry out our operations and meet project deadlines. Accordingly, we prioritise and value close working relationships with our suppliers.

Hindmarsh's supply chains largely fall into two categories:

1. Supply and installation of construction related materials, plant and equipment and services.
2. Goods and services to support the businesses general operations.

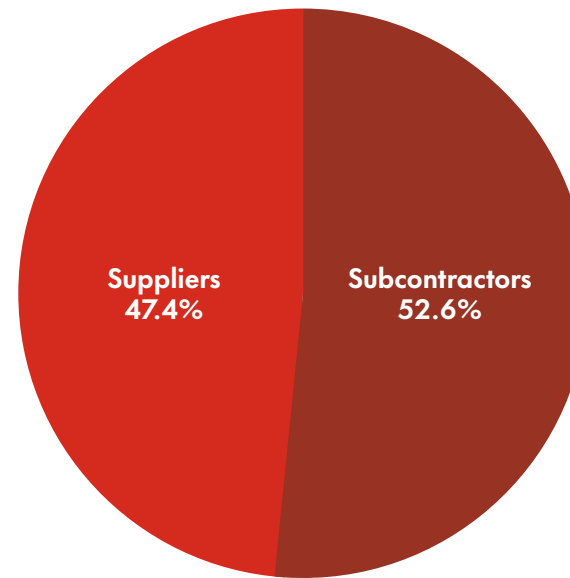
In order to deliver the services for our clients, Hindmarsh's supply chain is dominated by the contracted supply and installation of construction related materials, plant and equipment, and services. We recognise that our diverse range of subcontractors and suppliers have their own intricate and often complex supply chains, which in some cases extend beyond Australian borders.

In the reporting period Hindmarsh engaged 1,657 suppliers, consultants and subcontractors, with:

- 47.4% of these being suppliers; and
- 52.6% comprising subcontractors.

A total of 20 of these suppliers and subcontractors made up approximately 31.7% of all spend.

Supply Chain Composition by Volume



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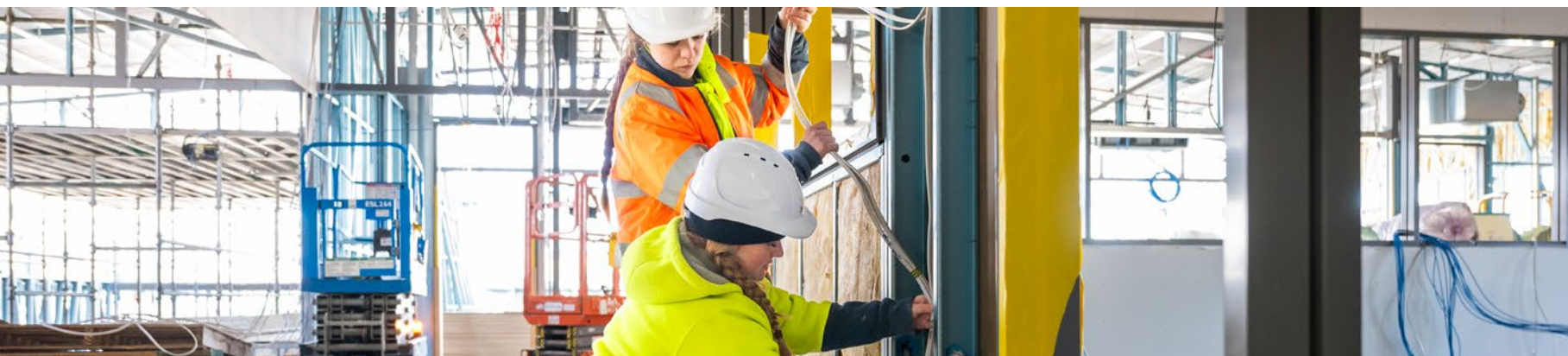
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Supply Chains and supplier relationships

Given the project nature of Hindmarsh's operations, subcontractors remain a key component of our project delivery to our clients. This means that, generally, Hindmarsh's suppliers are engaged on a project-by-project basis, with Hindmarsh having a preferred panel of suppliers to ensure consistency and continuity of supplier relationships. Longer term suppliers are typically for goods and services for administrative purposes.

Hindmarsh's supply chains cover a wide range of third parties, with differing levels of complexity. Contributing factors to complexity include the types of projects, lifecycle of projects and the sectors that Hindmarsh services and operates.

A summary of our key supply chains (whether via direct suppliers or subcontractors) are as follows:

- Labour Hire and Trades;
- Construction Materials;
- Waste;
- Information Technology;
- Complex Services; and
- Professionals providing design & engineering services.

Hindmarsh is cognisant that the industry it operates within, and the complex supply chains that it engages with, pose heightened modern slavery risks. Hindmarsh takes a targeted risk-based approach to address and mitigate these modern slavery risks within its operations and supply chains.



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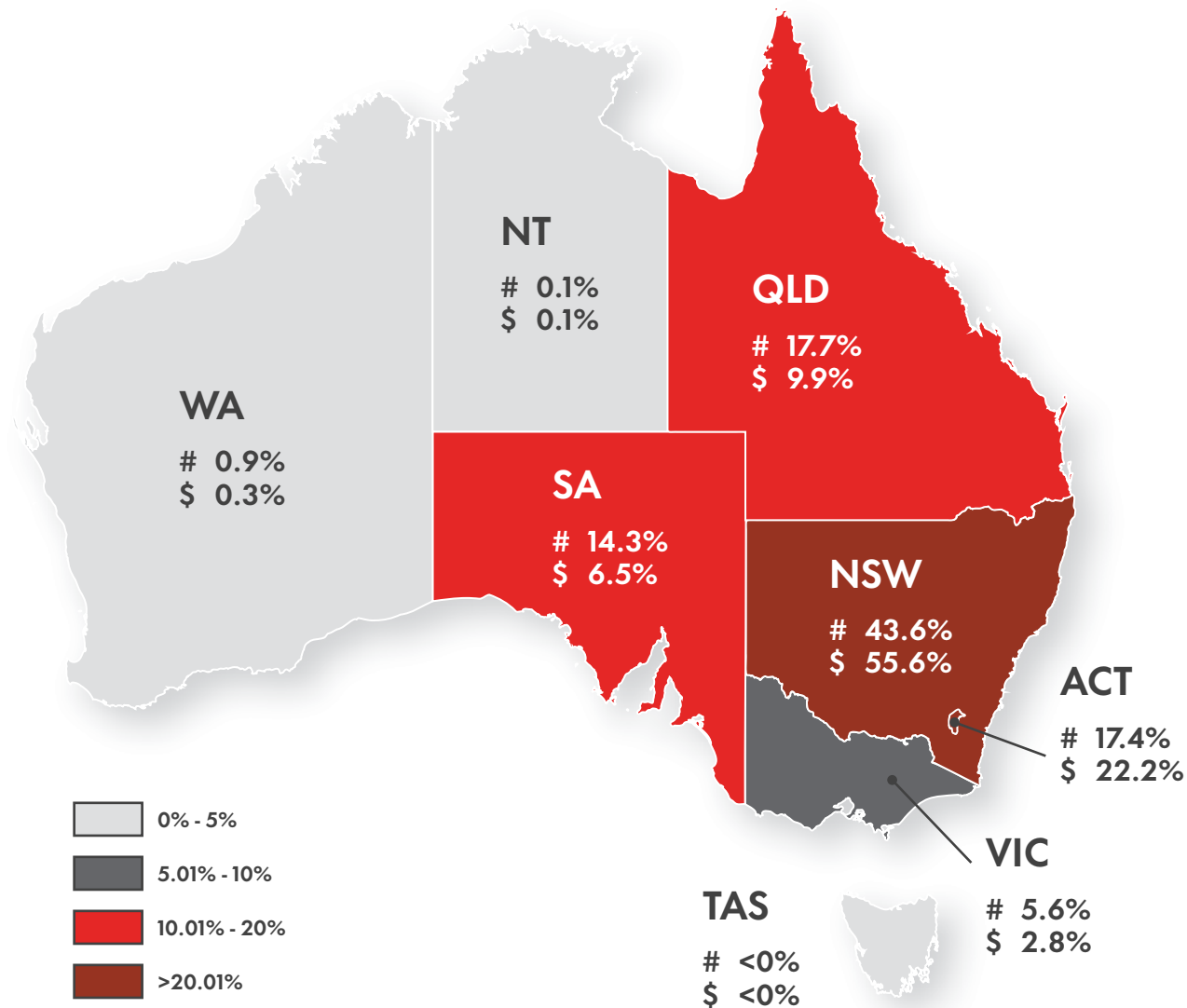
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Locations of our Tier 1 Suppliers - by Volume (#) and Spend (\$)



*Hindmarsh engages three (3) international suppliers based in Sri Lanka, Singapore and the US.

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CRITERIA 3:

RISKS OF MODERN SLAVERY

The first step in Hindmarsh's due diligence framework is to ensure that we have a strong understanding of our risk profile which enables targeted, risk based due diligence to be undertaken to address and mitigate these risks.

Hindmarsh is cognisant of the inherent challenges posed by modern slavery within the construction industry. These challenges are amplified due to the intricacies of multi-tiered supply chains, which obscure transparency into deeper supply chain layers, as well as the heightened vulnerabilities associated with the procurement of certain raw materials.

Further, in construction supply chains, risks can be amplified due to the prevalence of risk factors such as:

- jobs being performed by unskilled labour workers;
- dangerous working conditions; and
- long working hours; and
- tight construction delivery deadlines have the potential to compromise safe working practices.

The above risk factors make workers more vulnerable to modern slavery.

Additionally, certain raw materials from other countries are more susceptible to human rights violations, including child labour and forced labour. Specific examples include polysilicon in solar panels, steel, bricks, timber and glass.

When considering our operational and supply chain modern slavery risks of modern slavery, Hindmarsh utilises the UN Guiding Principles "cause, contribute to, or directly linked to" framework to consider whether it may cause, contribute to, or be directly linked to modern slavery practices.

Modern slavery risks are assessed in relation to Hindmarsh's potential to:

- **Cause** modern slavery: the risk that Hindmarsh's operations may directly result in modern slavery.
For example, directly engaging migrant workers and withholding their passport and / or other identity documents.
- **Contribute** to modern slavery: the risk that Hindmarsh's operations and/or actions in supply chains may contribute to modern slavery, including any acts or omissions by Hindmarsh.
For example, imposing tight deadlines on a supplier resulting in the use of child labour to meet project deadlines.
- Be **directly linked** to modern slavery: the risk Hindmarsh's operations, products or other services may be connected to modern slavery through the activities of another entity.
For example, engaging a supplier that is then later found to be utilising forced labour to produce its goods.

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Operations

All Hindmarsh employees and contractors are based in Australia and paid in accordance with applicable Australian laws and regulations. Further, Hindmarsh has a strong corporate governance framework which includes a Whistleblower Policy which allows employees and other eligible whistleblowers to report grievances and concerns, including any modern slavery concerns.

The Hindmarsh Whistleblower Policy provides reporting mechanisms including the ability to report anonymously. Furthermore, Hindmarsh's procurement practices involve a layered approval process, which serves to reduce the risk of Hindmarsh contributing to modern slavery.

As outlined above, the construction industry carries heightened modern slavery risks. On site and as part of monitoring the overall construction process, Hindmarsh has a number of systems in place that allow the business to be aware of work completed and the working hours of employees and subcontractors. There are also several controls on-site that Hindmarsh employs that revolve around ensuring accurate time information is kept for all site workers. Hindmarsh has had these measures in place not only from a modern slavery perspective but also to ensure compliance with various work health and safety requirements across all worksites. Strong oversight on this front ensures that employees, subcontractors and any labour hire engaged on construction projects are managed appropriately and risks of any extensive labour which could indicate modern slavery risks are mitigated. Whilst delivering projects in line with desired timeframes is a key driver for Hindmarsh, these processes ensure that the operations of the business mitigate modern slavery risks to the fullest extent.

Given the above, the risk of modern slavery practices within the operations of Hindmarsh is considered to be low. The risks associated with labour hire and lack of transparency are explored further within our supply chains section below.

Supply Chains

Various factors can contribute to modern slavery risks and practices, including sector and industry risks, product and services risks, geographical risks and entity risks. All these factors must be considered when analysing risks of modern slavery.

For Hindmarsh, risks of modern slavery may be heightened in third parties that are connected to us via our business relationships. Particular risks are more likely to present deeper in our supply chains where we have less visibility and control over these suppliers. Currently, we focus our efforts on analysing, and monitoring the risk profiles of, our Tier 1 suppliers, with the view to extend our supply chain analysis deeper into our supply chains as our compliance framework progresses.

Hindmarsh is particularly focused on identifying modern slavery risks in its supply chains that involve material sourced from:

- overseas regions that have a heightened risk or history of modern slavery;
- domestic industries that can attract unskilled and migrant workers, such as cleaning, security and labour hire; and
- commodities that have a higher risk of modern slavery, including solar panels and bricks.

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Industry	Cause, Contribute or Directly Linked to	Risk of modern slavery
Cleaning	Contribute or directly linked to	The cleaning industry is susceptible to modern slavery practices due to several factors. Firstly, it often relies heavily on low-skilled, low-paid labour, making it attractive to exploitative employers seeking to cut costs. The decentralised and fragmented nature of the industry, with many small subcontractors, can lead to poor oversight and regulation enforcement, allowing exploitation of vulnerable workers. Additionally, the demand for cheap and flexible cleaning services can create conditions where workers, especially migrants and undocumented individuals, are more susceptible to exploitation, including debt bondage, human trafficking, and forced labour.
Security	Contribute or directly linked to	The security industry is at risk of modern slavery practices because it often employs low-skilled and easily exploited workers, including migrant workers and those with limited job options. The emphasis on cost-effective services can lead to poor wages and working conditions. Complex subcontracting and outsourcing can also mean that transparency is limited.
Labour Hire	Directly linked to	<p>The labour hire industry carries many heightened risk factors for modern slavery primarily due to the prevalence of temporary and migrant workers who are more vulnerable to exploitation. Another key risk indicator in the labour hire industry is the payment of recruitment fees by the worker back to the agency.</p> <p>Additionally, the industry is made up of many small providers, making it harder to monitor and enforce regulations. The demand for cheap and flexible labour can also lead to worker exploitation as employers cut costs or impose tight deadlines, creating a cycle of vulnerability.</p> <p>Hindmarsh has a robust framework in place at work sites regarding monitoring work hours and how workers 'clock on and off'. This framework demonstrates and reinforces good governance and actions taken to reduce risks of worker exploitation.</p>
Polysilicon (raw material in solar panels)	Directly linked to	<p>The use of polysilicon, a critical component in solar panels and electronics, is associated with modern slavery risks, particularly when the polysilicon originates from specific high risk regions. These risks encompass forced labour, poor working conditions, and labour exploitation in polysilicon production facilities.</p> <p>Vulnerable populations, including ethnic minorities and migrant workers, often face coercive labour practices, debt bondage, and lack of essential labour protections in this jurisdiction. Furthermore, the complex supply chains involved in the sourcing of polysilicon further complicates efforts to trace the origin of raw materials and assess the modern slavery risks associated with the procurement of solar panels.</p>

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Challenges

Supply chain disruptions and rising costs continue to present challenges for the construction industry. Hindmarsh is aware that these factors can put pressure on projects and may have impacts on workers deeper down the supply chains.

The opaque nature of manufacturing and construction supply chains and the frequency of subcontracting within the industry presents another level of challenges to Hindmarsh with respect to observing the practices and potential risks within its supply chains.

Hindmarsh acknowledges the tension based on the intersection between environmental and sustainability practices and the increased modern slavery and human rights issues that can be associated with products required on these projects. The raw materials used in solar panels is a key example. Hindmarsh continues to be engaged to work on projects for 'green buildings', often requiring the sourcing of solar panels and batteries. Many of the raw materials used in these products are associated with forced labour and therefore these products carry inherent modern slavery risks. Hindmarsh is continuing to work to balance its obligations and the risks of modern slavery as it works towards building energy efficient buildings for Australia's future.



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In each reporting period, we refresh our analysis as to whether Hindmarsh could contribute to modern slavery practices in its operations or supply chains. The outcome of this analysis again confirmed that Hindmarsh does not knowingly contribute to modern slavery risks therefore any contribution would be inadvertent via links in our value chain.



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CRITERIA 4:

ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

This statement is Hindmarsh’s fifth annual modern slavery statement. The focus of this reporting period has been to undertake further deep dive due diligence on key high risk supply chains and ensure that our policy and procedure framework, which is the foundation of our broader compliance efforts, is up to date and robust for our ongoing compliance efforts.

The table below summarises the key actions that Hindmarsh has implemented in this reporting period.

Item	Action	Progress
Procurement Policy	<p>During the reporting period, we finalised our Procurement Policy which will be approved and implemented during FY25.</p> <p>This Procurement Policy will complement our existing policy suite (composing our Modern Slavery Policy, Supplier Code of Conduct and Whistleblower Policy) to outline the modern slavery risks associated with the procurement of certain materials and products. The Procurement Policy will place additional controls in the procurement process and encourage further due diligence on suppliers who present heightened modern slavery risks (for example, because of the jurisdiction in which they operate or the products that they supply).</p>	Finalised – to be implemented during FY25.
Questionnaire	<p>During this reporting period, we developed and issued modern slavery questionnaires to thirty (30) suppliers selected on the basis of their risk.</p> <p>Introducing this process into our due diligence is vital to our overarching goal to continue to dive deeper into our supply chains, where the prevalence of modern slavery risks is heightened.</p>	Completed
Broader supply chain due diligence	We have continued to undertake risk matrixing and risk screening on our new suppliers as the initial form of supplier due diligence.	Completed

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Policies and Procedures

During the reporting period, Hindmarsh developed and finalised a Procurement Policy which outlines Hindmarsh's procurement procedures and guidelines which will be formally implemented during FY25. The Policy clearly prescribes specific modern slavery risks and considerations when procuring certain materials and products and the due diligence processes that should be undertaken where heightened modern slavery risks present.

This will complement our suite of existing policies in governing our modern slavery compliance and our broader compliance efforts. A description of how each policy or procedure operates within our modern slavery compliance framework is outlined below:

- **Modern Slavery Policy** – outlines our approach to our modern slavery compliance framework and our dedication to undertake actions to address and mitigate our risks of modern slavery in our operations and supply chains.
- **Supplier Code of Conduct** – outlines our expectations for our suppliers in addressing modern slavery risks and broader environmental, social and governance expectations.
- **Whistleblower Policy** – provides a framework for eligible whistleblowers, including suppliers and employees, to report on eligible disclosures, including modern slavery concerns.
- **Anti-Bribery and Corruption Policy** – outlines Hindmarsh's stance against bribery and corruption and the processes and procedures for mitigating the risk of bribery and corruption practices in its organisation.

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Due Diligence

Risk Screenings

Hindmarsh regularly screens all new suppliers and subcontractors using a global analytics screening tool. We also screen key suppliers and subcontractors prior to awarding large subcontract packages in order to identify whether any have adverse modern slavery or other Environmental, Social, and Governance (ESG) related findings by authorities or adverse media.

Specifically, the screening tool screens against the following areas:

- Integrity risks
- Environment, social and governance risks
- Data and cyber risks
- Operational and quality risks
- Identity risks
- Financial risks.

While the screening results came back with no modern slavery adverse findings for our suppliers, where other adverse ESG related findings have been identified by these searches, the Working Group considers these findings and determines appropriate arrangements for monitoring and addressing these risks. For example, ongoing monitoring of the supplier or subcontractors engagement and ensuring that there is regular reporting by the relevant supplier or subcontractor back to Hindmarsh.

Risk Matrix

Our risk matrix focuses on our highest risk suppliers and considers risk factors such as:

- Jurisdiction risk – For example, a supplier who operates in a high risk country.
- Entity risk - For example, an entity with labour rights violations.
- Product / service-based risks – For example, products containing polysilicon such as solar panels.
- Sector and industry risk – For example, the solar panel industry.

The risk matrix is based on data provided from sources including the Walk Free Foundation Global Slavery Index and the Global Corruptions Perception Index. Hindmarsh is aware that many of its suppliers also engage immediate suppliers that operate in countries where modern slavery is more prevalent, which will form part of the ongoing development of the risk matrix and how these suppliers are classified. The risk matrix is critical to informing inherent risk ratings and therefore our due diligence activities, for instance, we prioritise due diligence on suppliers who are based in higher risk jurisdictions or provide higher risk services or goods.

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Questionnaires

During this reporting period, Hindmarsh developed, implemented and issued a modern slavery questionnaire to thirty (30) of our highest risk suppliers. We issued the modern slavery questionnaires primarily to suppliers that:

- were identified as high-risk through the risk matrix and screening process described above;
- source materials or solar panels from overseas jurisdictions (in particular, façade materials and other materials sourced from high-risk jurisdictions); or
- are involved in either the cleaning or security industry (which have been identified under Criteria 3 as high-risk industries).

We have considered the results of the questionnaire with our third-party specialists to ascertain the appropriate next steps for further due diligence. We acknowledge that the questionnaire is a step to identify potential risks and that ongoing dialogue with our suppliers is critical.

Hindmarsh will continue our questionnaire process and how we can increase supplier engagement with the questionnaire process. Hindmarsh will continue to identify high risk supply chains to issue the questionnaire to in future reporting periods and refine our processes to gather information about Hindmarsh's supply chains.

Employee Training

We continue to undertake training of all new employees to ensure that there is an ongoing awareness of Hindmarsh's expectations and requirements with respect to identifying and addressing modern slavery risks in its operations and supply chains.

The training covers the following matters:

- What modern slavery is;
- How to identify modern slavery;
- Risk areas for Hindmarsh;
- Key process changes;
- Requirements for due diligence; and
- Hindmarsh's modern slavery strategy.

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CRITERIA 5:

EFFECTIVENESS OF ACTIONS

Hindmarsh is continuously reviewing its current actions to address and mitigate modern slavery risks to measure its effectiveness and to make any necessary changes as required.

Our Working Group reviews our due diligence process in each reporting period to ascertain if our current processes and procedures are adequately identifying and monitoring our operational and supply chain risks. This resulted in the development and issuing of our modern slavery questionnaire in this reporting period to our suppliers identified as the highest inherent risk rating. The Working Group will use the learnings from this process and apply necessary changes in the next reporting period to increase supplier responsiveness to the questionnaire and the ability to gather useful information about our supply chains. As such, Hindmarsh continues to be committed to expanding its due diligence processes to gain more insight into the risk associated with its direct suppliers and obtaining oversight over the modern slavery risks deeper down the supply chains.

Additionally, we continue to monitor and review our policy framework to ensure that it reflects our processes and procedures. The implementation of our Procurement Policy during the reporting period is the most recent expansion of our policy and procedure framework to ensure that we are adequately reflecting our approach to addressing modern slavery risk in our procurement practices.

Hindmarsh continues to work towards implemented a formal audit framework which will assess the following:

- compliance with policies and procedures such as the Hindmarsh Modern Slavery Policy;
- reviewing the number of third parties such as suppliers and subcontractors who had due diligence conducted;
- benchmarking Hindmarsh itself and key third parties connected to us;
- auditing a supply chain; and
- reviewing the number of employees to complete modern slavery training.

Through this process, Hindmarsh will be able to develop key performance indicators and identify gaps and areas of our framework that require improvement which then can guide our action items in each reporting period.

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CRITERIA 6: CONSULTATION

HCA and HCAQ are governed by the same Board and executive leadership team and policies and procedures, of which are outlined in Criteria 4 above, apply across both entities.

The Hindmarsh Modern Slavery Working Group consists of executives from both HCA and HCAQ who have contributed to the undertaking the actions described in this statement, as well as in the development of this statement. Furthermore, the same contracts apply to both entities and the same personnel review all supplier tender submissions and the risks associated with these contracts and tender submissions.

Accordingly, because there are uniform governance processes which apply across both entities, including a uniform approach to supplier due diligence, consultation between HCA and HCAQ was extensive.

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In the next reporting period, Hindmarsh will continue to build upon the progress made during this reporting period, particularly with regard to expanding its due diligence efforts which dive deeper into its supply chains. We will continue to engage our stakeholder groups to seek opportunities for improved awareness, due diligence and cooperation amongst all parties with regard to modern slavery compliance.

Based off efforts made in this reporting period, Hindmarsh is reviewing and looking to expand the framework for conducting due diligence, including expanding the supplier base to whom we issue questionnaires to and undertaking further deep dive due diligence into our supply chains.

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