



HACER GROUP

Modern Slavery Statement

2021 / 2022

HACER
group

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INTRODUCTION

MODERN SLAVERY IN CONTEXT

Modern slavery remains a pressing issue. Approximately 40.3 million people around the world and at least 15,000 people in Australia continue to live in slavery-like conditions.

To Hacer Group, these numbers are unacceptable, and demonstrate that we need to continue to do the work in order to make meaningful progress towards eradicating slavery 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. We recognise that our operations have the potential to have a genuine impact.

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 Hacer Group Board of Directors on 28 November 2022. The Statement was approved on behalf of the joined reporting entities.



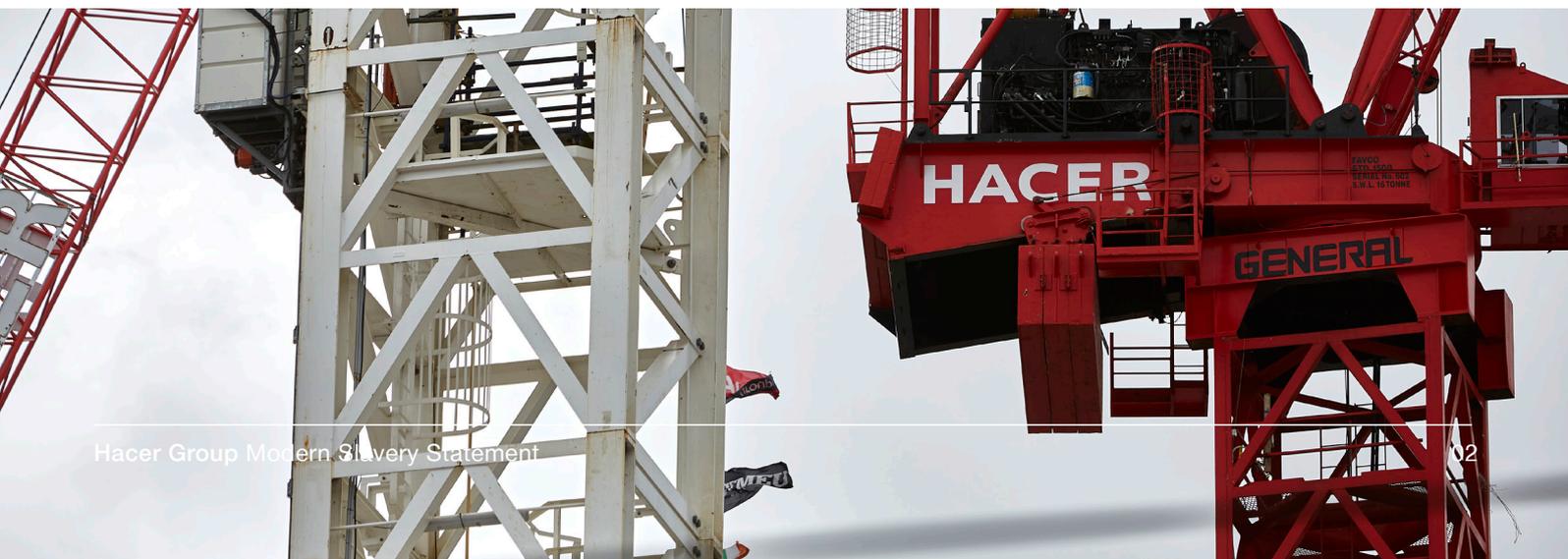
Paul Toleman
Director



Mark Lewis
Director



Vin Sammartino
Director



THE IMPACTS OF COVID-19

In the context of the COVID-19 pandemic, taking action to address modern slavery has never been so pressing.

Factors including actual or anticipated loss of income, a lack of awareness of employee rights in the context of a pandemic, having to work overtime to cover labour gaps and increased demand due to resource shortages is expected to have rendered some workers more vulnerable to modern slavery. Unsurprisingly, COVID-19 has affected our operations, and in particular, our global supply chain.

The pandemic impacted our capacity to assess and address modern slavery risks as we had originally intended. Our Modern Slavery Committee was unable to meet as frequently as planned, in-person training sessions had to be postponed as a portion of our workforce moved to working from home and many subcontractors and suppliers were facing unprecedented pressures, which rendered engaging with our supplier assessments unusually burdensome and difficult.

Notwithstanding these challenges, we continued to work diligently with our clients and key stakeholders in our supply chain throughout the pandemic to protect and maintain the safety of all people.

In this reporting period we have gained ground, pushing ahead with our educational and awareness-raising plans, and discovering new and improved means of gathering subcontractor and supplier modern slavery data.

COVID-19 has affected our operations, and in particular, our global supply chain.



SECTION 1: OUR STRUCTURE, OPERATIONS & SUPPLY CHAIN

The Reporting Entity

This is a joint Modern Slavery Statement for the financial year ended 30 June 2022 (“Statement”).

This Statement covers Hacer Group Pty Ltd (ACN 091 032 530) as trustee for the Hacer Group Unit Trust together with associated entities over which Hacer Group Pty Ltd has control (as determined in accordance with the Australian Accounting Standards).

For the purposes of this Statement, Hacer Group Pty Ltd and the associated entities over which it has control are referred to as “Hacer Group”.

Hacer Group’s Statement has been published in accordance with the Act.

References in this Statement to a ‘year’ relate to the financial year ending 30 June 2022.

Company Structure

Hacer Group, founded in 2000, is a privately held Australian construction company with approximately 250 employees across Victoria and New South Wales. Hacer Group’s head office (being its registered office) is located at 87 High Street, Kew, Victoria.

Hacer Group Pty Ltd (ACN 091 032 530) and the following associated entities are identified as the reporting entities for the purposes of the Act:

Hacer Australia Pty Ltd (ACN 650 862 721, ABN 90 650 862 721)

Hacer Group Pty Ltd (ACN 091 032 530 as trustee for the Hacer Group Unit Trust, ABN 86 972 049 616)

Hacer Group QLD Pty Ltd (ACN 142 880 975, ABN 87 142 880 975)

Hacer Group NSW Pty Ltd (ACN 604 377 282, ABN 99 604 733 282)

Hacer Group Australia Pty Ltd (ACN 612 663 831, ABN 69 612 663 831)

Arc Metal Group Pty Ltd (ACN 615 321 438, ABN 72 615 321 438)

Hacer Group WA Pty Ltd (ACN 604 376 632, ABN 48 604 376 632)

Hacer Group SA Pty Ltd (ACN 605 304 514, ABN 66 605 304 514)



Hacer Group's Operations

Hacer Group specialises in the construction and delivery of low, medium and high-rise mixed-use residential, retail, office and commercial developments, shopping centres, hotels, hospitals and medical centres and commercial fit outs.

As an experienced 'design and construct' contractor, we have successfully completed projects for a range of major Australian companies.

Additionally, Hacer Group holds a 'controlling interest' over Arc Metal Group Pty Ltd ("Arc Metal"). Arc Metal specialises in the design, fabrication and fitting of metal architectural products, which are incorporated into a diverse range of construction projects across Australia.

Consultation With Controlled Entities

Hacer Group's associated entities are managed by the same organisational representatives and carry out similar operations. Consequently, our Modern Slavery Committee is capable of managing Hacer Group's obligations with respect to the Act.

A senior representative from Arc Metal, an entity which sits outside Hacer Group's core business, was appointed to the Modern Slavery Committee in the first reporting period. This has allowed Hacer Group to stay aware of and respond to Arc Metal's distinct modern slavery risks.

Simultaneously, Arc Metal are aware of our shared responsibilities under the Act and are included as part of Hacer Group's response to modern slavery.

Position In The Market

450m

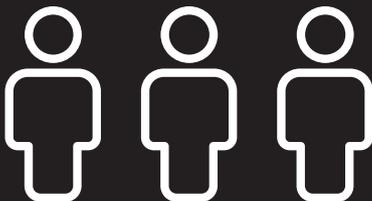
Annual Revenue Circa

70%

Repeat Client Work

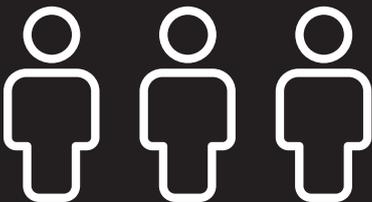
350+

Completed Projects



1b+

Works Under Construction



250+

Experienced Team Members

Residential /
Commercial /
Retail /
Mixed Use /
Student Accommodation /
Medical /
Industrial Goods /
Aged Care /

100-250m

Project Value



Project Sectors

Supply

As a builder that operates across various sectors, Hacer Group has a complex and diverse global supply chain. Our core business has not changed in the reporting period. Accordingly, our supply chain remains unchanged, and continues to include the design, manufacturing, and supply of the products we use in our construction projects and the provision of specialised construction services.

Over the reporting period, the number of subcontractors and suppliers we engaged increased to approximately 240 across construction sites located in Victoria and New South Wales. Our subcontractors and suppliers continue to range from small, privately run businesses through to global multi-national companies. In addition, Hacer Group's supply chain continues to encompass services that contribute to our operations, such as cleaning and security services.

A significant proportion of our subcontractors and suppliers are located in Australia. However, we remain aware that a small number of our subcontractors and suppliers are either based in or operate factories overseas, and a number of local subcontractors and suppliers source their materials from overseas.

For example, a plumber engaged by Hacer Group might acquire materials from a local supplier, but it is likely that the local supplier sources their products from overseas. Therefore, the third tier of our supply chain likely expands our global reach. As a result, delving into the supply chains of our direct subcontractors and suppliers continues to act as a key consideration in the framing of our risk mitigation strategy.

In addition, Hacer Group directly procures some materials and components from manufacturers based overseas. These imported components largely relate to building facades and joinery, which are integrated into our projects. In order to continue to mitigate modern slavery risks arising within our extended local and international supply chains, we have carried out further supplier risk assessments.

The findings of our risk assessment processes are discussed below.





SECTION 2: IDENTIFYING RISKS OF MODERN SLAVERY IN OUR SUPPLY CHAIN

Modern Slavery Risks

We are aiming to identify risks of modern slavery within our supply chains, to appropriately address and mitigate such risks. We understand ‘risks of modern slavery’ to mean the potential for Hacer Group’s operations and supply chain to cause, contribute to or otherwise be directly linked to instances of modern slavery, including risks to people in the form of forced labour, debt bondage, deceptive recruitment of labour and the worst forms of child labour.

Recognising that these risks do not take a singular form, and can often be invisible, we do not propose to identify every possible risk through our risk mapping measures. Rather, we recognise that identifying potential risks will require regular assessment and entrenched internal risk identification and rectification processes, being the result of sustained efforts over time.

Risk Mapping Exercises

Hacer Group has always taken measures to ensure that every stakeholder in our supply chain complies with all applicable government standards. To this end, as a precondition to tendering, subcontractors and suppliers are required to submit a tender price based on a scope of works which complies with government environmental and health and safety requirements.

Hacer Group then undertakes due diligence processes to ensure that the business practices of subcontractors and suppliers align with our ethics and standards, including with respect to human rights. A register that is accessible to all staff is maintained to ensure employees can identify where our subcontractors and suppliers have not met our standards. Where a subcontractor or supplier falls short of our expected standards, our EHSQ team may issue a company-wide alert notifying Hacer Group’s employees of such breach. This process remained unchanged in this reporting period.

Last reporting period we carried out an initial subcontractor and supplier risk assessment activity.

The data set obtained from each of our subcontractors and suppliers was used to begin to formulate a detailed risk map of our supply chain, developed by reference to the inherent risks in particular product or service categories, and the likelihood of modern slavery risks eventuating based on the geographical origin of the particular product or service.

We had intended to formulate our response to the risk map by categorising subcontractors and suppliers according to levels of risk. However, it quickly became apparent that manually gathering such data was beyond the scope of what we could realistically achieve in a 12-month period (and continue on a rolling basis year after year), even operating on a strategy of prioritisation.

Ultimately, our research into options available in the market revealed that a solution existed in the form of a digital platform (Informed365). The platform provides a streamlined, digital means of collecting supplier and subcontractor data, analysing the information in a similar, but more sophisticated manner. We subscribed to the platform and undertook a number of onboarding and training sessions with Informed365.

Since January, we have worked with Informed365, the Property Council of Australia's consortium and our subcontractors and suppliers to streamline and improve our data gathering processes. Membership of this group has also provided Hacer Group with opportunities to collaborate with industry participants in order 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.

The ethos of Informed365 and the Property Council's consortium reflects our ambitions in this space, and membership of the platform has broadened the scope of our action significantly.

CHALLENGES

Whilst membership of Informed365 has enhanced our subcontractor/supplier data collection process significantly, it has not eliminated all the challenges we had previously been facing.

For most of this reporting period our response rate recorded via the Informed365 platform was low, and subcontractors and suppliers seemed largely unresponsive to our reminder prompts.

Towards the end of this reporting period, we shifted our approach and began asking our site-based contract administrators to reach out to their contacts within subcontractor and supplier companies that had not yet completed the assessment. We anticipated that subcontractors and suppliers receiving direct correspondence from Hacer Group employees, and in particular those employees who have pre-existing relationships with the subcontractors and suppliers, was likely to have a greater impact than the generic correspondence we had initially sent via the platform.

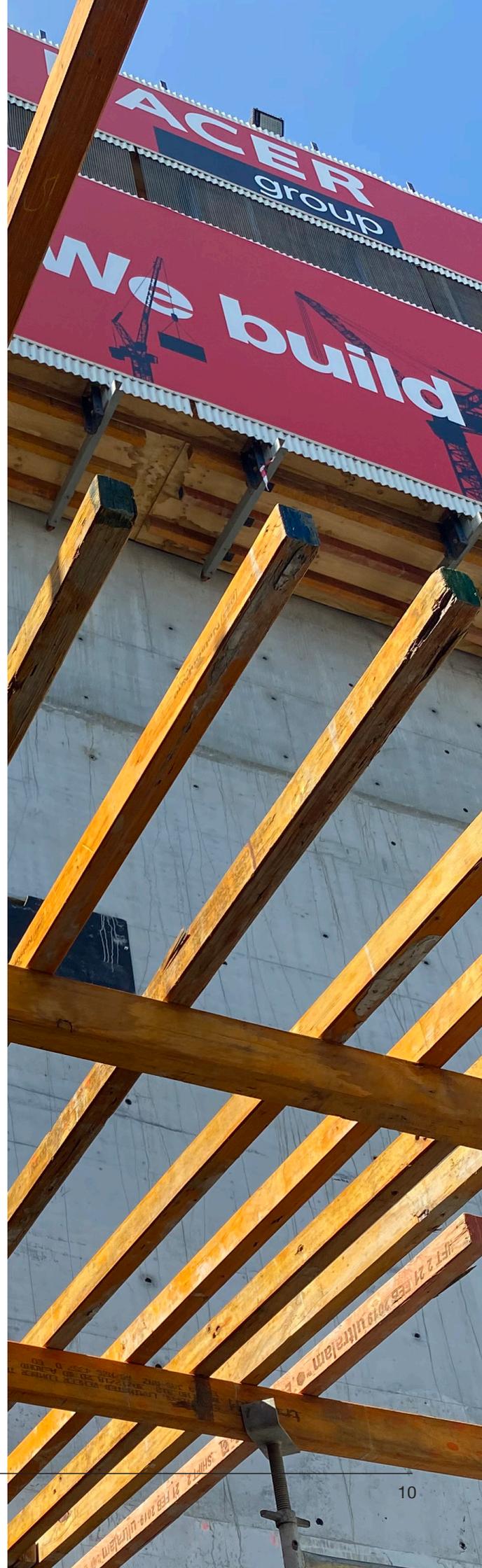
As anticipated, the effect of this was not only to significantly increase our response rate, but also to generate awareness around Hacer Group's modern slavery approach internally. This involvement from site-based personnel prompted further questions and generated insightful discussion around modern slavery generally, and Hacer Group's approach to the issue.

Nonetheless, at the end of this reporting period our response rate remained lower than we had anticipated. We are taking our findings as key lessons learnt and are planning to incorporate direct site-based correspondence with subcontractors and suppliers from the outset in the next data-gathering period.

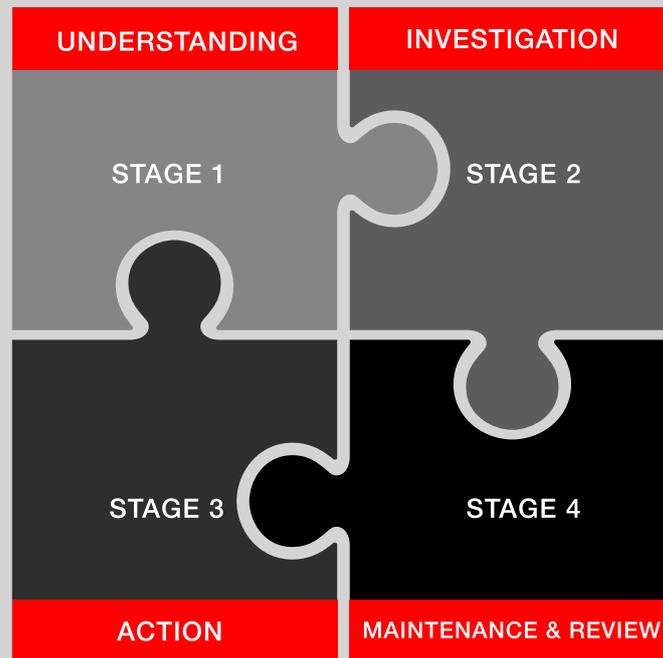
REFORMULATING OUR APPROACH

Reflecting on our progress and the effectiveness of our actions in previous reporting periods, it became clear that our existing approach was not feasible or productive to continue long-term. We had been trying to collect subcontractor and supplier data, analyse the data received, formulate a plan for taking meaningful action to reduce the risks of modern slavery identified, action this plan in collaboration with the relevant subcontractors and suppliers and analyse the effectiveness of our actions in this space, all while implementing a comprehensive internal and external educational programs to raise awareness of modern slavery risks within our operations and supply chain. The scope of this work, combined with the challenges we have faced in attempting to gather valuable supply chain data from subcontractors and suppliers led us to rethink our approach.

Given this understanding, in this reporting period, we developed and began to implement a staged approach. Under this approach, we plan to tackle one of four major steps at a time, allowing us to dedicate the required time and resources to each stage of the process. This comprehensive framework for supplier risk mapping will sit alongside, and complement, our other continuing actions, which are focused mainly around education, raising awareness and developing and improving existing structures and processes.



SUPPLIER RISK MAPPING - STAGED APPROACH



UNDERSTANDING (~ 2 years)

The first two reporting periods have been a process of beginning to understand our obligations under the Act, and starting to investigate and trial tools available to determine the best way to fulfill our obligations.

ACTION (ongoing)

Evaluate the data, and formulate a productive plan to follow up and collaborate with subcontractors / suppliers to reduce risks of modern slavery in their operations.

INVESTIGATION (2 - 5 years)

Gather data from subcontractors / suppliers using available tools.

MAINTENANCE & REVIEW (ongoing)

Holistically review our processes, determine what is and is not working and continue the process of gathering up to date data and actioning the risks that are discovered.

Under this new approach, our first two reporting periods can be appropriately categorised as constituting the Understanding Stage. Throughout this period, we spent countless hours educating ourselves on modern slavery generally and conducting experimental data gathering exercises.

Subsequently, this reporting period marked the beginning of our Investigation Stage. This multi-year stage is focused on developing and employing the most effective tools to gather data from subcontractors and suppliers relating to their supply chains, allowing us to move beyond consideration of the first tier of our global supply chain. In this stage, we are aiming to dramatically increase our response rate on the Informed365 platform and consequently, the amount of data we are collecting and analysing.



Guiding Principles

Hacer Group's response, and in particular our shift to working with Informed365 and the consortium of industry participants incorporates the United Nations Guiding Principles on Business and Human Rights.

Fundamentally, our approach is based around the foundational principle of respect for human rights; namely the need to prevent, mitigate and remediate any adverse human rights impacts arising within our business operations (Principle 11).

Moreover, the following principles have shaped our current approach:

- avoid causing or contributing to adverse impacts through Hacer Group's own activities (including omissions), and seeking to prevent or mitigate impacts where we have not contributed but that are linked to our operations, and taking immediate action to address such impacts, should they occur (Principle 13)
- identifying and ranking as the most severe those risks which would cause the greatest harm to people or where a delayed response by Hacer Group would render potential adverse impacts irremediable (Principle 24);
- assessing the appropriate response to a modern slavery risk by considering;
 - > whether Hacer Group caused or contributed to the risk or whether the risk was directly linked to our operations, products or services by a business relationship (Principle 19(b)(i)); and
 - > considering the extent of Hacer Group's leverage in addressing the adverse impact (Principle 19(b)(ii)); and
 - > assigning the prevention and mitigation of modern slavery risks to the appropriate individual and business unit (Principle 19(a)).

SECTION 3:

ACTIONS WE HAVE TAKEN TO ADDRESS MODERN SLAVERY

Modern Slavery Risk Mitigation

Hacer Group's aim is to entrench a modern slavery risk mitigation process within our business that encapsulates how we address actual and potential adverse human rights impacts (including modern slavery) in our operations and supply chain.

To this end, Hacer Group has taken a number of tangible actions over the year to assess and address modern slavery risks.

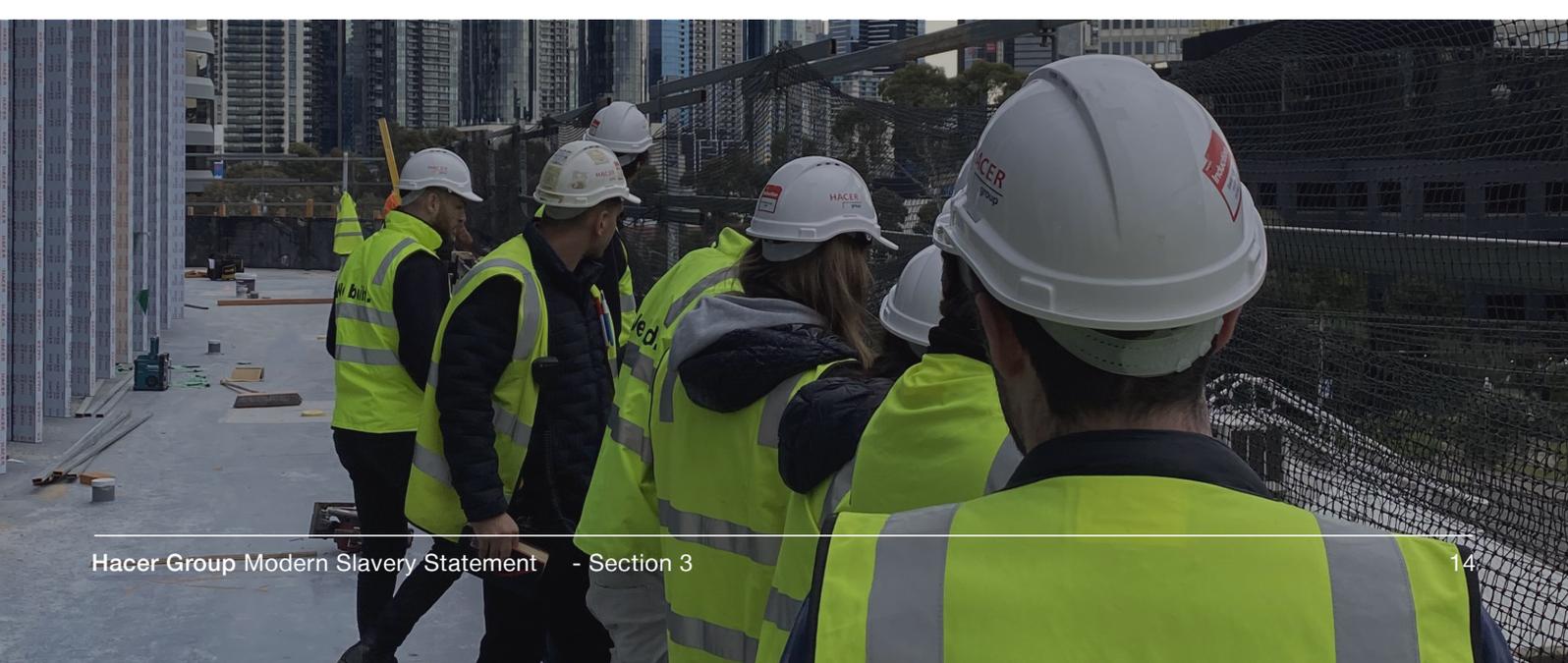
A summary of these actions are as follows:

GOVERNANCE

- The internal Modern Slavery Committee, established in the first reporting period, continues to meet on a regular basis. The Committee remains responsible for:
 - > the ongoing implementation of Hacer Group's strategy to meet our obligations under the Act;
 - > preparing Hacer Group's Modern Slavery Statement and recommending it for approval by Hacer Group's board of directors;
 - > discussing the implementation of Hacer Group's modern slavery risk identification and mitigation strategy, including the requisite grievance procedures;
 - > continuously updating our 'actions checklist' to ensure measurable outcomes and milestones for the business are set, which is to be updated prior to each meeting to ensure compliance with the program; and
 - > updating (where required) the internal modern slavery policy, which sits within the business' suite of policies.
- Members of our Modern Slavery Committee include representatives from key areas of the business including directors and managers in the human resources, procurement, legal and construction teams. Having a Modern Slavery Committee with diverse membership ensures risk mitigation strategies are entrenched in all relevant business functions. Importantly, all members have the requisite authority to supervise compliance with any modern slavery policies and procedures within their business units.

POLICIES & PROCESSES

- > **Training:** With most of our staff back in the office and on site in this reporting period, we implemented the first major stage of our modern slavery educational training program. Hacer Group staff (including key representatives of Arc Metal) attended and engaged in an informative training session run by Robin Mellon, expert in sustainability, supply chains and human rights and modern slavery within supply chains, and CEO of Better Sydney, on understanding modern slavery generally, and recognising the risks that may arise in the construction industry. The session was recorded and made available to staff who were unable to attend.
- > Additionally, a modern slavery module was developed in-house. Used as a tool to supplement the live training session, the module was made available to all staff, and rendered compulsory training for those unable to attend the training session and all new staff members.
- > The Legal team also attended a number of webinars run by Informed365, in conjunction with the Australian Border Force, throughout the year to stay up to date with new developments and common mistakes made in relation to modern slavery reporting.
- > **Strengthening Contracts:** In FY21 we incorporated modern slavery provisions into Hacer Group's subcontracts and supply agreements. This reporting period we have continued to ensure modern slavery provisions are included in all subcontracts and supply agreements. The relevant provisions set out Hacer Group's expectations and clarify the notification process if a subcontractor or supplier becomes aware of a modern slavery risk. A termination right is also available to Hacer Group if the relevant subcontractor or supplier fails to halt or remediate instances of modern slavery in its operations or supply chain.
- > **Risk Assessment:** We built on the manual modern slavery declaration process we conducted in FY21, and utilised the Informed365 digital platform to collect and collate data from subcontractors and suppliers.
- > **Policies:** An internal modern slavery policy, drafted and added to the existing suite of business policies and procedures in FY21, was distributed to all new employees and remained available to existing employees via the internal portal.



SUPPLIER ENGAGEMENT

This year, Hacer Group has continued to build on the initial engagement established with our Australian and international subcontractors and suppliers in previous reporting periods.

Through our legal and site teams procuring completion of our Modern Slavery Declarations via Informed365 we were able to maintain engagement with subcontractors and suppliers and raise awareness of modern slavery.

By conducting further investigatory enquiries into high-risk subcontractors and suppliers and providing a direct line of communication to the Modern Slavery Committee through the remediation framework (set out below) in the next reposting period, we are aiming to maintain dialogue on the issue with all members of our supply chain.

We are seeking to ensure we are working in a collaborative, supportive and transparent manner with our subcontractors and suppliers to initiate change and address any risks of modern slavery existing within our business operations and supply chain.

Modern Slavery Risk Remediation

If, through our risk identification processes, Hacer Group determines that we have caused or contributed to modern slavery, we acknowledge our responsibility to take active steps to remediate that impact.

The Modern Slavery Committee members have been deemed the ‘first responders’ for modern slavery risks. The Committee’s response, and implementation of the remediation framework, will depend on the specific circumstances and Hacer Group’s causal link to the adverse impact, which will be considered having regard to the UN Guiding Principles on Business and Human Rights.

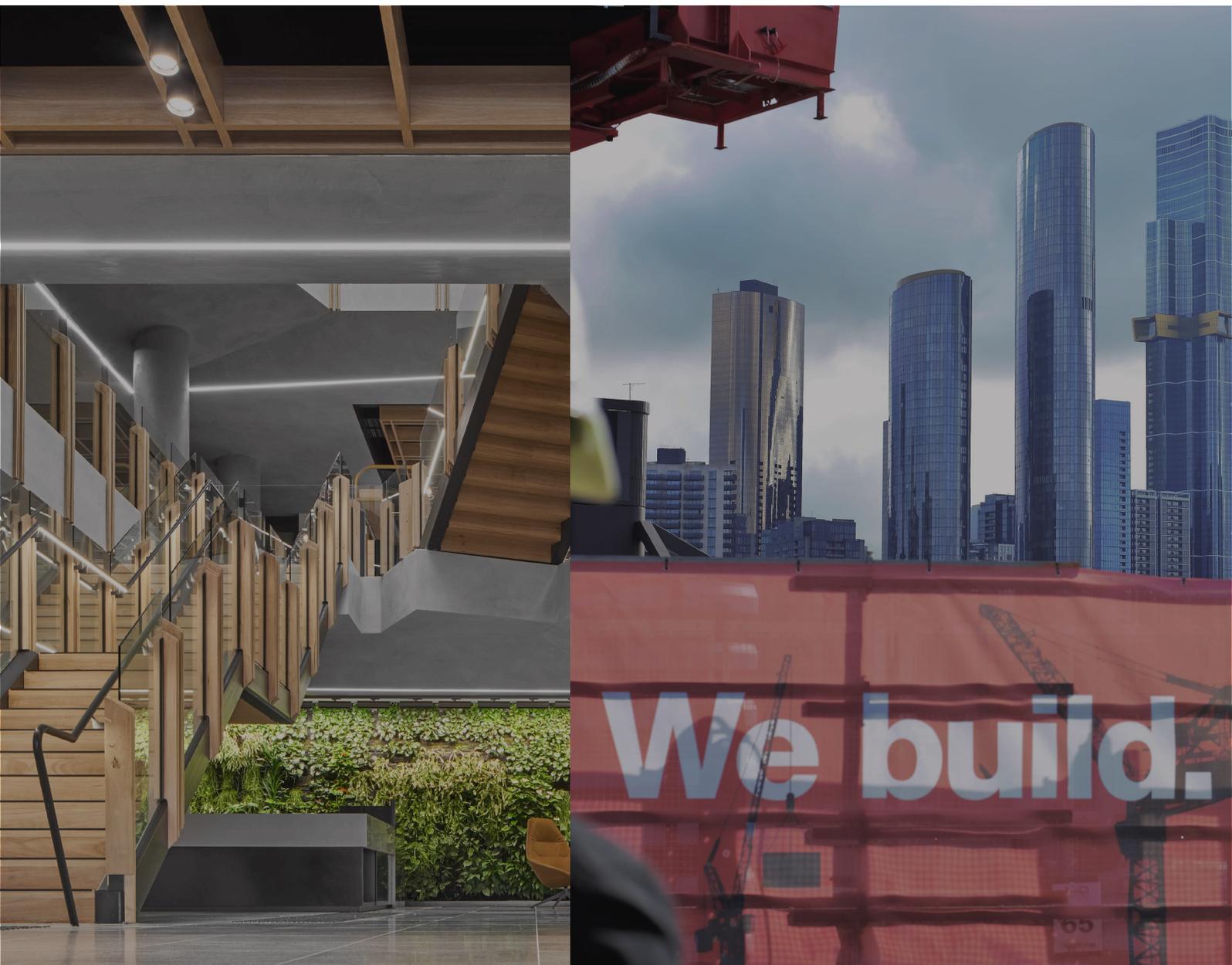
Where Hacer Group determines an actual modern slavery breach has occurred, contacting the Australian Federal Police will be the first major step upon becoming aware of the incident. We will then look to action appropriate measures to prevent such a breach occurring in the future.

Hacer Group’s response will depend on the circumstances of the individual case, but may include any of the following:

- information gathering to understand the full scope of the modern slavery risk;
- taking steps to ensure the harm caused by modern slavery is mitigated and will not occur again;
- communicating the modern slavery risk to appropriate authorities;
- stopping Hacer Group’s activities that cause or contribute to modern slavery, including by taking action under its subcontract or supply arrangements;
- issuing company wide alerts and updating supplier registers serving to notify all business units that a systemic modern slavery issue with a subcontractor or supplier has been identified; and
- providing resources to educate and support subcontractors and suppliers to ensure the harm does not recur.

Our Modern Slavery Committee has formalised a ‘remediation framework’, which has been incorporated into Hacer Group’s general remediation processes. It has been widely recognised that in order to be effective, a grievance process must be “trusted and confidential”, and therefore this was a primary consideration when updating our general remediation processes.

One of the key aims of our training session and internal modern slavery module was to reinforce and embed this framework within Hacer Group’s business operations. In the coming reporting period, we are aiming to continue this process of embedding the framework through education, and to distribute copies of the remediation framework widely, ensuring it is prominently displayed in offices and on all sites.



SECTION 4:

ASSESSING EFFECTIVENESS OF OUR ACTIONS

Hacer Group is committed to long-term action.

However, we recognise that in order to achieve our longer-term goals, we need to have measures in place to evaluate the effectiveness of our actions over the reporting year. We also need to identify any shortfalls and adapt our response where necessary to ensure our actions are working effectively.

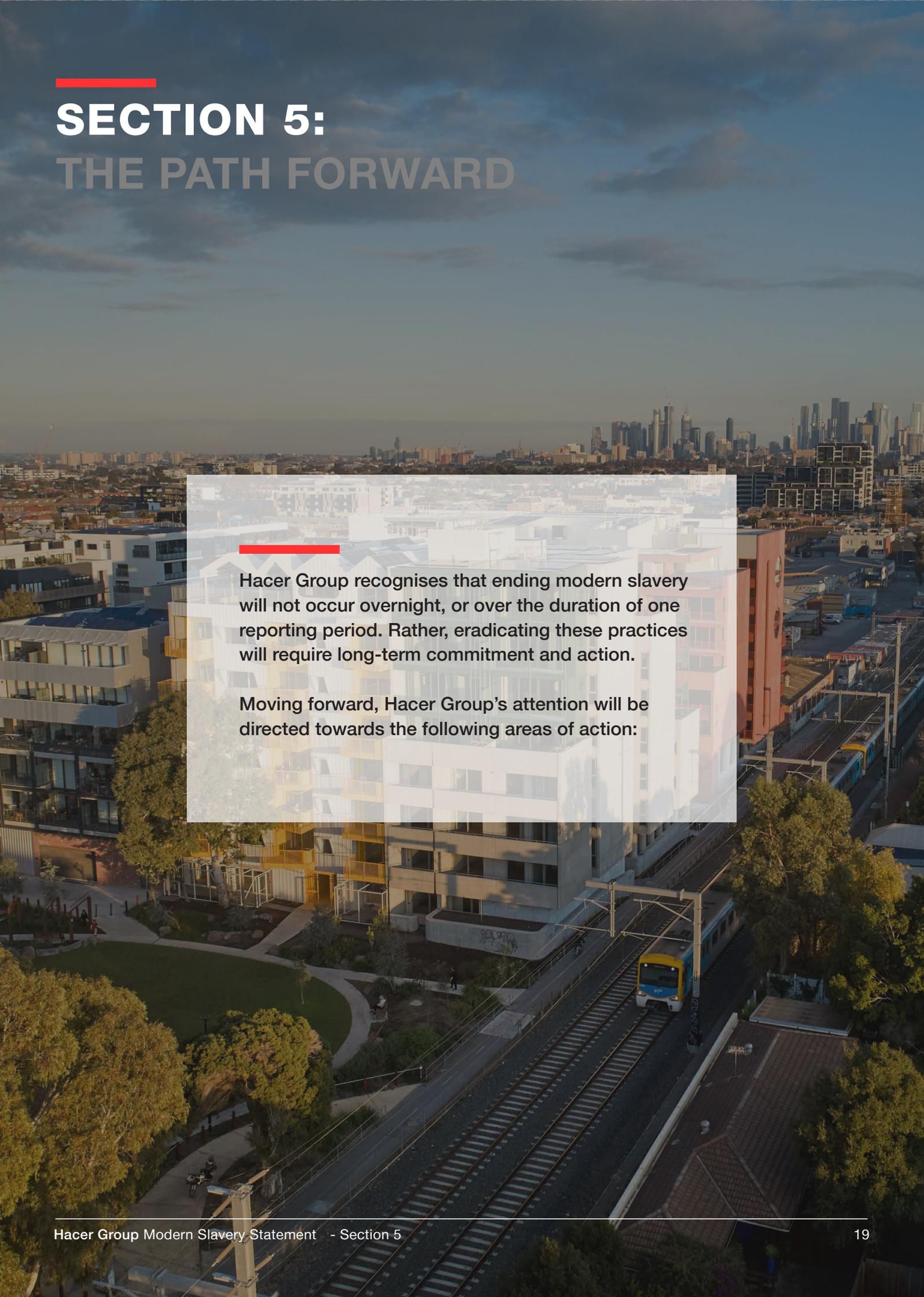
Armed with this understanding, the mechanisms we are currently using to measure the effectiveness of our actions include:

- the Modern Slavery Committee maintaining a program – an ‘Actions Checklist’ – that is updated prior to each meeting, and monitors the completion status of the ‘activities’ against this program during each meeting;
- utilising Informed365’s tools to track the number of subcontractors and suppliers who have completed the modern slavery declaration;
- assessing and keeping a record of:
 - > the number of modern slavery training programs delivered by internal and external experts;
 - > the percentage of our employees undertaking modern slavery training;
- > the feedback of employees in response to modern slavery training sessions;
- > the number of complaints made and resolved under Hacer Group’s reporting and grievance mechanisms; and
- > the number of subcontractors and suppliers who have signed agreements with Hacer Group that incorporated our standard modern slavery provisions;
- gathering data on our actions and reflecting on the extent to which we have achieved our actions annually, including shifting focus for the subsequent period where required:

ASSESSING AND EVALUATING EFFECTIVENESS OF ACTION

Area of action	Action item	Intention for FY22	Achieved?	Goal for FY23
GOVERNANCE	Modern Slavery Committee	Ensure internal Committee meetings are held at regular intervals, minutes taken and action items clearly elucidated, distributed and reflected upon.	☑	Ensure internal Committee meetings continue to be held regularly, minutes taken and action items updated.
POLICIES & PROCESSES	Modern Slavery Policy	Publish and distribute new internal modern slavery policy to existing employees and incorporate into suite of policies provided to new employees.	☑	Continue to distribute the moderns slavery policy to new employees during the induction process, and keep the policy available for existing employees via the portal.
	Training & Education	Implement construction-specific training and work on creating our own Hacer Group modern slavery module.	☑	Arrange a further company-wide training session, focusing on modern slavery risks specific to our industry/business. Distribute module to all new staff members.
	Strengthening Contacts	Ensure modern slavery clauses have been incorporated into all of Hacer Group's subcontracts and supply agreements.	☑	Continue to screen documents to ensure modern slavery clauses are included in all relevant contracts, and review clauses to ensure any developments in the law are appropriately reflected
	Risk Assessment	Risk assessment / risk rating tools under the Informed365 platform to be utilised.	—	Continue monitoring the risk assessment / risk rating tools available on the Informed365 platform as we focus on getting more subcontractors / suppliers to respond.
SUPPLIER ENGAGEMENT	Modern Slavery Declaration	Commit to working with Informed365 to establish a streamlined means of gathering and utilising subcontractor and supplier data.	☑	Continue undertaking the data gathering processes of the <i>Investigation Stage</i> via Informed365, and aim to increase the number of subcontractor / supplier responses.
	Education for Subcontractors / Suppliers	Draft and distribute Modern Slavery Guide which clearly sets out the purpose of the Act	—	Utilise the training and education programs embedded within Informed365 platform to educate subcontractors / suppliers
RISK REMEDIATION	Remediation Framework	Draft and distribute remediation framework to all employees. Aim to administer planned education programs to embed the framework.	—	Ensure all staff are aware of how to access and utilise the modern slavery risk remediation framework. Run a trial to ensure there are no gaps in the framework.

☑	= Completed
—	= In Progress

An aerial photograph of a city, likely Melbourne, showing a tram on tracks in the foreground, modern residential buildings, and a dense city skyline in the background under a clear sky.

SECTION 5: THE PATH FORWARD

Hacer Group recognises that ending modern slavery will not occur overnight, or over the duration of one reporting period. Rather, eradicating these practices will require long-term commitment and action.

Moving forward, Hacer Group's attention will be directed towards the following areas of action:

OPERATIONS

- Continued distribution of our internal policy and grievance procedure.
- Ongoing incorporation of Arc Metal into our modern slavery strategy, primarily by ensuring the appointed representative is involved in all Modern Slavery Committee meetings and Arc Metal employees are invited to all internal training sessions.
- Increased engagement with external sources, particularly with the Informed365 personnel and consortium group, to increase our knowledge and stay up to date on the latest developments in relation to modern slavery risks and risk remediation strategies.
- Continued implementation of our modern slavery educational program across all business units, including engaging further guest speakers and undertaking 'spotlight' training sessions, focusing in on industry and company specific modern slavery issues.
- Modern slavery training to be made compulsory learning for all employees.
- Incorporation of the Hacer Group modern slavery training module into our existing suite of induction training modules for new employees.
- Relying on the tools offered by Informed365, development of an educational training program to be offered to subcontractors and suppliers.

SUPPLY CHAIN (MONITORING & ASSESSMENT)

- Maintain membership of Informed365 platform, which will allow for improved information-gathering processes, and capacity to prioritise high-risk subcontractors/suppliers.
- Continued engagement with our subcontractors and suppliers to improve awareness and encourage collaboration and transparency in relation to modern slavery risks.
- Sustained reinforcement of our expectations to subcontractors and suppliers regarding modern slavery risks and practices, bolstered by our use of the Informed365 platform.

CONTINUOUS IMPROVEMENT

- Ongoing periodical assessment undertaken by the Modern Slavery Committee in relation to the effectiveness of our modern slavery strategy.
- Continued monitoring of the effectiveness of our subcontractor and supplier due diligence process.
- Maintaining levels of engagement with key stakeholders in relation to modern slavery risks and practices.
- Engaging in industry collaboration with the Informed365 consortium to allow for knowledge sharing, peer assistance, the setting of a high industry-wide standard and the formation of a collective approach to the issue.

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