

HUNTER MASON

Modern Slavery Statement
FY2025

Hunter Mason (NSW) Pty Ltd

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SECTION 1: BACKGROUND

Introduction & Identifying The Reporting Entity

This Statement is provided by Hunter Mason (NSW) Pty Ltd (ABN 22 656 817 131) of L 9, 341 George Street Sydney NSW 2000, Australia ('Hunter Mason', 'us', 'we', 'our') in accordance with the requirements of the Modern Slavery Act 2018 (Cth) ("the Act") for the period 1 July 2024 to 30 June 2025 ("the reporting period"). Under the Act, entities with annual consolidated revenue of \$100 million or more must prepare and publish a Modern Slavery Statement each year. This is the first reporting period in which a Hunter Mason entity (Hunter Mason NSW) has met the consolidated revenue threshold of the Act and been subject to reporting obligations.

This Statement describes the steps taken by Hunter Mason NSW to address modern slavery risks in our operations and supply chain during the reporting period. Each section of our statement corresponds to a mandatory criterion of the Modern Slavery Act.

This Statement covers the operations and supply chain of Hunter Mason NSW, as well as three other Hunter Mason entities, referred to here as 'Hunter Mason Group'. Hunter Mason Group is not a legal entity. The Group includes Hunter Mason NSW Pty Ltd (a reporting entity for the purposes of the Act) and three other Hunter Mason entities (not reporting entities for FY25), set out later (see 'Our Structure'). The Group has shared leadership, governance, policies and management practices including with regard to modern slavery risk assessment and management. Strategic decisions, policies, and operational standards are centrally coordinated and consistently applied across all regions.

For the purposes of this Statement, unless otherwise stated, the terms 'Hunter Mason', 'the Group', 'our business', 'the Company', 'organisation', 'we', 'us', 'our' and 'ourselves' will refer to the Hunter Mason Group, including Hunter Mason NSW. Unless otherwise stated, the governance, policies, processes, modern slavery risks and associated controls described in this Statement refer to or apply to Hunter Mason NSW (the reporting entity) and all other entities within the Group.

This Statement contains forward-looking statements. These reflect our current intentions and expectations, which are subject to change due to evolving circumstances and should not be interpreted as guarantees.

SECTION 2: STRUCTURE, OPERATIONS & SUPPLY CHAIN

Our Structure

Hunter Mason is a construction management and fit-out contractor delivering projects across the commercial, education, health, government, and industrial sectors throughout Australia. Hunter Mason is a privately owned Australian construction and fit-out group established in Sydney, New South Wales, in 2012 and has since expanded its presence to Victoria 12 March 2020 and the Australian Capital Territory 25 February 2021. The business also delivers projects in other regions, including Queensland, Western Australia and Tasmania. Hunter Mason 'Group' consists of three entities with operations in Australia, set out below:

ENTITY	DESCRIPTION
Hunter Mason (NSW) Pty Ltd (ABN 22 656 817 131) Level 9, 341 George Street, Sydney NSW, 2000	Head Contractor in NSW
Hunter Mason (ACT) Pty Ltd (ABN 57 648 245 916) Level 3, 15 Moore Street Canberra ACT, 2601	Head Contractor in ACT
Hunter Mason (VIC) Pty Ltd (ABN 54 639 724 708) Level 4, 75-77 Flinders Lane Melbourne VIC, 3000	Head Contractor in VIC

These entities are regionally focused construction operations under common control. As noted above, the Group is not a legal entity, and only Hunter Mason (NSW) Pty Ltd (ABN 22 656 817 131) is a reporting entity for the purposes of the Modern Slavery Act.

Hunter Mason is governed by four Directors who set the strategic direction and oversee financial, operational, and compliance matters for Hunter Mason NSW and the other Hunter Mason entities in the 'Group'. Day-to-day management is delegated to the National Leadership Team (NLT), comprising national managers for operations, HSEQ, finance, people and culture, and ICT. All entities operate under a single governance and policy framework, with no separate state-based boards. Policies and procedures, including those covering procurement, modern slavery, safety, and quality, are developed centrally and applied nationally across operations of all three entities.

Hunter Mason does not publish a public Annual Report or have a Board of Directors. Governance is documented internally through organisational charts, policy frameworks, and regular meetings between the Directors and NLT.

OUR OPERATIONS

Our Activities

Hunter Mason (NSW) Pty Ltd operates as a head contractor in the commercial construction sector. Its core business involves the delivery of high-quality workplace environments through construction, refurbishment, and fit-out projects. Hunter Mason delivers projects for clients across various industries, including technology, finance, aviation, retail, and government. The company manages projects from initial concept through to completion, coordinating all aspects of design, procurement, construction, and handover.

Hunter Mason's core services focus on construction management, refurbishment, and fit-out solutions. We deliver end-to-end project services, including planning coordination, and execution, across commercial, and critical infrastructure developments.

Our key operational activities include:

- **Project Management:** Hunter Mason oversees the full lifecycle of construction projects. This includes client engagement, budgeting, scheduling, risk management, and quality assurance.
- **Design Coordination:** The company works closely with architects, engineers, and consultants to ensure design intent is achieved and integrated with construction methodologies.
- **Site Management:** Dedicated site teams manage daily operations, subcontractor coordination, safety compliance, and progress tracking.
- **Cost Planning and Estimating:** Pre-construction teams develop detailed cost plans and tender submissions, ensuring financial viability and transparency.
- **Construction Delivery:** Hunter Mason executes construction works across a range of commercial sectors, including corporate offices, retail spaces, education facilities, and government buildings.
- **Refurbishment and Fit out:** The company specializes in upgrading existing spaces, often in live environments, requiring careful staging and stakeholder communication.
- **Client Services:** Post-completion services include defect rectification, maintenance coordination, and ongoing client support.

During FY24-25, Hunter Mason (NSW) and the broader group of Hunter Mason entities experienced steady national growth and increased project volume, particularly through government and institutional clients. During the reporting period we delivered 48 projects for Hunter Mason NSW alone, and over 80 nationally. This included expansion into the Tasmanian market and increased growth in government and education sector engagements.

WHERE WE OPERATE

We operate exclusively within Australia, with offices and project sites across New South Wales, Victoria, the Australian Capital Territory, and, most recently, Tasmania (under the Victorian entity). We maintain three permanent offices in Sydney (NSW), Melbourne (VIC), and Canberra (ACT, with Tasmania managed through VIC). Hunter Mason has no international operations or offshore facilities. All facilities are leased commercial offices or client-controlled construction sites. We do not own or operate any manufacturing, fabrication, or warehousing facilities. Each project is supported by a temporary site office or amenities compound, typically located within the client's premises or leased from the project landlord. These sites are project-specific and time-limited, with subcontracted trades performing physical works under Hunter Mason's supervision.

OUR WORKFORCE

At the end of the reporting period, we directly employed 76 individuals at Hunter Mason NSW and over 140 nationally, including casual staff, with all managerial and site management roles held by our own employees. Of these NSW employees, 23 of 76 are female staff.

Hunter Mason's direct workforce includes a range of site-based and office-based roles responsible for delivering construction projects from pre-construction through to completion. Our direct workforce typically includes:

- Site Management and Supervision – Senior Site Managers, Site Managers, Foremen, Leading Hands.
- Project Delivery and Engineering – Construction Managers, Project Directors, Senior Project Managers, Project Managers, Contract Administrators/Project Coordinators, Project Engineers.
- HSEQ and Compliance – Safety Coordinators, National HSEQ and Operations
- Design and Pre-Construction – Design Managers, Design Coordinators, Estimators, Services Manager, Bid Managers, Bid Coordinators.
- Business Support – Administration, Finance, People & Talent, and Client Experience roles.

Extended workforce

Hunter Mason supplements its direct workforce through subcontracting, labour hire, and recruitment agencies to meet business needs and client deadlines. Key subcontracted and labour hire services include carpentry, tiling, painting, electrical, and plumbing. Approximately 15-20% of on-site personnel are direct Hunter Mason employees, with the remainder being subcontractors or labour hire workers. The proportion of Hunter Mason personnel increases proportionate to project size and complexity.

OUR SUPPLY CHAIN

Hunter Mason Group engaged approximately 460 suppliers nationally during FY25 to support its construction, refurbishment, and fit-out activities.

Hunter Mason's procurement activities are predominantly domestic with all Tier 1 suppliers concentrated in Australia. Many of our suppliers provide goods likely manufactured overseas and/or use raw materials mined or produced in other countries, such as concrete, stone, carpets and fixtures.

Our supply chains cover the following categories summarised in the table below.

GOODS AND SERVICES	DESCRIPTION
Construction trades and subcontracted services	<p>Services: Subcontracted labour & construction trades (structural, carpentry, electrical, plumbing, mechanical, demolition, and finishing trades).</p> <p>Geographic origin: Australia</p>
Building materials and consumables	<p>Goods: Concrete, Steel, Timber, Glazing, Joinery and Fixtures.</p> <p>Geographic origin: Primarily Australian providers, noting that raw materials likely sourced from other geographies.</p>
Plant, equipment, and hire	<p>Equipment: Cranes, Scaffolding Access equipment, specialised tools.</p> <p>Geographic origin: Australia, noting that equipment likely manufactured in other geographies.</p>
Corporate and operational support services	<p>Services: IT, travel, cleaning, waste management, and staff training</p> <p>Geographic origin: Australia</p>
Professional and technical services	<p>Services: Design, engineering, surveying, and certification</p> <p>Geographic origin: Australia</p>

SECTION 3: RISKS OF MODERN SLAVERY

Understanding And Assessing Modern Slavery Risk

During the reporting Hunter Mason undertook efforts to understand its obligations under the Modern Slavery Act and took actions to engage an external partner with expertise in human rights and modern slavery.

- Our understanding of modern slavery risks is guided by the Modern Slavery Act 2018 (Cth), its associated Commonwealth guidance for Reporting Entities, and the United Nations Guiding Principles on Business and Human Rights (UNGPs).
- We note that Modern slavery describes situations where people are exploited through coercion, threats, or deception, removing their ability to make free choices. It includes practices such as human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, the worst forms of child labour, and deceptive recruitment for work or services.
- We understand “modern slavery risk” as the potential for [Hunter Mason] to cause, contribute to, or be directly linked to modern slavery through its operations and supply chains.
- We acknowledge that in this context, risk refers to “risk to people”—specifically, the risk that workers may be exposed to conditions of modern slavery.

To build internal understanding and lay the foundation for a risk-based approach, we commissioned an independent third party during the reporting period to conduct a modern slavery risk assessment. The assessment was planned during the reporting period and carried out in late 2025. Insights from this engagement informed the risks identified and the future actions outlined in Section 4.

The assessment approach consisted of:

Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities, Attorney-General’s Department (2023)

- Stakeholder engagement, site visits, desktop research and data review to identify potential risk factors in our business.
- Alignment to key research sources, industry reports including those released by the Property Council of Australia, and SME knowledge .
- Operations risk scan: Analysis of risk factors relevant to operations, including business activities, locations and sites, employees, product and service delivery, investments and owned activities.
- Supply chain risk scan: Analysis of the key products and services (including third party labour) that contribute to Hunter Mason’s own products and services including our suppliers, and products and services used by indirect suppliers
- Consideration of key risk factors including (as set out in findings below): geographic risk (potential risks related to our locations of operations and the origin of procured goods and services); sector risk (modern slavery risks associated with our business activities and relationships); business model risk (considerations based on the way we do business); and vulnerable worker risk (focused on workers who may face increased vulnerability to exploitation).

RISKS IDENTIFIED

Risk Overview

Based on the approach described above, we have identified the three most relevant risks of modern slavery across our operations and supply chain.



Workers involved in subcontracted construction labour, notably migrant workers, experience labour exploitation and forced labour (e.g. debt bondage, wage theft, unsafe conditions, excessive hours).



Workers in ancillary corporate services such as cleaning and waste management experience exploitation (e.g. underpayment, unsafe environments) due to reliance on low-skilled, temporary labour and opaque subcontracting.



Workers in the supply chain for key goods and materials experience hazardous working conditions and severe exploitation (e.g. child labour, forced labour, coercive recruitment) in key inputs (e.g. timber, concrete, steel).

We also identified that three key risk drivers influence and amplify the level of modern slavery risk for Hunter Mason. These include:

- Our **business model** including contracting/subcontracting and dynamic, fast paced work.
- **High-risk industry** (construction as high-risk activity with dependence on complex global supply chains including high risk raw materials, manufacturing of goods).
- The presence of potentially **vulnerable worker groups** (such as migrant and informal labour) working on operational sites.

Key sources that informed the assessment included: Research in 43 Commodities Worldwide [Verité Commodity Atlas](#) [Global Slavery Index](#) [Walk Free Foundation](#), List of Goods Produced using Child Labour or Forced Labour US Dept of Labor U.S. Department of Labor, [Global Estimates of Modern Slavery](#) [International Labour Organisation](#) [Global Rights Index](#), [International Trade Union Confederation](#), Other sector-based, independent research, or case-based guidance, e.g., [Property, Construction and Modern Slavery](#); ERM & Property Council of Australia 'Indicators of vulnerability in forced labour' report.

Modern Slavery Risks In Our Operations

Modern slavery risk factors relevant to Hunter Mason’s operations are described in the table below, noting that while third party labour can be considered ‘supply chain’, contracted and subcontracted labour is core to Hunter Mason’s operational activity.

While direct employees are in low-risk office roles, operations are carried out by a range of direct contractors as well as subcontracted service providers which vary over time and project requirements. All site construction activities are performed by third parties engaged, supervised, and managed by Hunter Mason under formal contracts and project management systems.

As set out below, and further under supply chain risk, these third parties operate in high-risk sectors (with documented labour exploitation in the Australian context) notably cleaning, construction, security.

RISK FACTOR	RISK FACTORS RELEVANT TO HUNTER MASON
Geographic risk	We note that while Australia is relatively low risk overall, we operate in a sector that is considered in the Australian context to be high risk (see next). While indexes such as the Walk Free’s Global Slavery Index (GSI) consider Australia as low risk, we understand that modern slavery does occur in Australia in sectors relevant to our business, including construction, cleaning. We also source goods from global supply chains (see next section).
Industry & sector risk	We operate in the property and construction sector, which is recognised as a high-risk industry for human rights abuses in Australia. This is due to its labour-intensive operations, long working hours, hazardous environments, and reliance on vulnerable low- to medium-skilled workers and vulnerable migrant labour. We also engage third parties from high-risk sectors (e.g. construction, cleaning, security) to carry out our operations. Occasional use of labour hire also heightens risk given identified risks in Australian labour hire.
Business model risk	Hunter Mason operates a business model that relies on third parties and multiple subcontractor layers. The use of subcontracting and casual labour can reduce visibility of labour conditions and compliance with labour standards.
Workforce risk / vulnerable workers	The assessment found our direct employees are at low risk of modern slavery, as they are in high skilled salaried managerial and office-based positions. However, Hunter Mason entities have the potential to cause or contribute to labour exploitation through the engagement of third-party labour.

RISK FACTOR

RISK FACTORS RELEVANT TO HUNTER MASON

Our extended workforce consists of high-risk workers (unskilled, migrant, vulnerable) working in high-risk sectors (cleaning, security, and contracted construction labour) for labour exploitation in Australia. The sector frequently employs migrant workers, who may face language barriers, limited knowledge of their rights, and visa-related vulnerabilities. These factors increase the risk of exploitation, including underpayment, unsafe working conditions, and coercion. As Hunter Mason entities have the potential to cause or contribute* to labour exploitation on site through company actions, these risks are a priority.

Modern Slavery Risks In Our Supply Chain

Hunter Mason relies on a dynamic supply chain of goods, services, and subcontracted labour. This network includes suppliers of building materials, providers of joinery, flooring, and furniture, and engagement of logistics providers and on-site contractors and service providers.

Further tiers of the supply chain include suppliers involved in the manufacturing of finished goods, transport of goods, and the mining of raw materials. Each stage of the value chain presents potential risks of worker exploitation, particularly in sectors with limited transparency or weak labour protections. Four procurement categories have been identified as carrying an indicative medium to high level of risk.

The following table sets out relevant risk considerations:

GOODS AND SERVICES

RISK FACTORS RELEVANT TO HUNTER MASON

Construction trades and subcontracted services

As noted above, Hunter Mason engages third party contractors and subcontractors via a high-risk business model and in noted high-risk sector (property and construction). As noted on the pervious page, the business model depends on contracted and subcontracted labour and construction trades. This is also the greatest area of the supply chain in terms of spend, control and potential ‘involvement’.

Building materials and consumables

Hunter Mason’s sources goods and materials that are considered high-risk for modern slavery, i.e., forced labour practices within global supply chains.

- Extraction of raw materials for products such as timber, steel, and concrete often occurs in regions with weak labour protection.
- Manufacturing is considered a high-risk sector; additionally, across the processing and transportation stages, there are numerous points where exploitative labour practices can arise.

GOODS AND SERVICES

RISK FACTORS RELEVANT TO HUNTER MASON

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- Risks are particularly acute in countries with limited oversight, where migrant and informal workers may face unsafe conditions, withheld wages, or coercive recruitment practices.

Plant, equipment, and hire

Equipment hire can rely on manufacturing, high risk raw materials, and include subcontracted labour for operation, adding complexity and exposing workers to hazardous conditions and poor oversight.

Corporate and operational support services

Support services often involve low-skilled, temporary labour sourced through opaque subcontracting and labour hire arrangements.

- Cleaning services frequently rely on multiple subcontracting layers, reducing transparency.
 - Workers are often low-paid, temporary, or migrant, increasing vulnerability to exploitation.
 - Risks include unsafe work environments, withheld wages, and coercive recruitment practices.
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SECTION 4: ACTIONS TAKEN TO ASSESS AND ADDRESS

MODERN SLAVERY RISK

During the reporting period, the company took foundational steps toward understanding and addressing modern slavery risks. This included and commissioning an independent third-party modern slavery and human rights specialist to conduct gap assessment and risk assessment to inform our approach.

AREA	ACTIONS OR ONGOING CONTROLS AND RELEVANCE TO MODERN SLAVERY
Understand our obligations and assigning accountability	<ul style="list-style-type: none"> • Gained advice on our obligations regarding Modern Slavery. • Assigned an internal team member with responsibility for modern slavery compliance, reporting and risk management. • Undertook leadership discussions to confirm our commitment to Modern slavery and intent to report for FY2025 as a Group . • Assigned executive oversight of Modern Slavery to the MD.
Engage external support	<ul style="list-style-type: none"> • Engaged external specialist modern slavery support and agreed a scope of work for risk assessment, gap analysis of management practices, internal training and awareness raising and collaborative action planning (delivered).
Assess risk	<ul style="list-style-type: none"> • Commissioned specialist risk assessment (see above) including agreeing timing, scope and methodology (the assessment took place following the reporting period in late 2025).
Implement or develop relevant policies and practices	<ul style="list-style-type: none"> • Maintained policies including a Modern Slavery Policy that is under review as part of our modern slavery gap assessment and action planning process, human resources policies. • Continued alignment to Australian workplace law including verification of permanent employees work rights including VEVO checks, providing written contracts. • Commenced an initiative to strengthen ESG, governance, and compliance systems, including development of ESG roadmap and modern slavery action plan with expert advisors.
Manage risks to workers engaged or working on our sites	<ul style="list-style-type: none"> • Hunter Mason conducts contractor due diligence primarily through its online finance management platform, Jonas, and its WHS platform, BuildPass. We continued investment in digital project management and assurance platforms (Procore, BuildPass, Jonas & Power BI) to improve oversight and transparency of our projects. • All subcontractors must complete a Prequalification Questionnaire before mobilisation, providing information on WHS documentation and systems compliance, insurance and licences, competency verification, and business legitimacy including ABN validation.

AREA	ACTIONS OR ONGOING CONTROLS AND RELEVANCE TO MODERN SLAVERY
	<ul style="list-style-type: none"> • All trade and specialist construction works are facilitated through BuildPass, which captures WHS, insurance, and competency documentation, induction, qualified subcontractors engaged under formal agreements. • Subcontractors provide their own labour, equipment, and supervision while meeting the Hunter Mason’s safety, quality, and site management requirements. • All subcontractors and labour hire providers undergo capability and compliance checks, including licences, insurances, prior to engagement and are managed by project teams including toolbox meetings, and audits in case if issues (primarily quality, safety); all contractors receive induction to relevant policies and safety requirements; Hunter Mason commonly engages repeat contractors regularly. • Recruitment agencies and labour hire companies are engaged on an as-needed basis for professional or hard-to-fill roles and occasional contract labour. • In the reporting period, supplier/contractor due diligence and management was limited to legal and regulatory compliance and safety standards. In future (via our Action Plan)we will consider ways to integrate labour rights considerations.
Managing risks in procured goods and services	<ul style="list-style-type: none"> • For services, Hunter Mason has an established prequalification process (see above, managing risks on site) and Procurement and Subcontractor Managements procedures. • Suppliers of goods are also pre-qualified prior to being onboarded to Hunter Mason. • A Code of Conduct is established and will be reviewed for applicability to modern slavery in the next reporting period
Provide access to grievance mechanisms and remediation	<ul style="list-style-type: none"> • A Whistleblower policy established and is primarily internal facing; in the next reporting period we will review this and consider accessible complaints mechanisms for indirect workers and suppliers. • Hunter Mason is yet to develop an approach to remediation of modern slavery or human rights issues.
Engage stakeholders	<ul style="list-style-type: none"> • As noted, Hunter Mason engaged third party expertise to review its risks and approach and develop this Statement. • We also engaged with leading practice customers from the property and construction sector to understand and meet their expectations regarding modern slavery.

SECTION 5: ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

In FY25, Hunter Mason concentrated on building a foundational understanding of the Modern Slavery Act and our responsibilities under it. We also worked to raise internal awareness of modern slavery risks and their potential relevance to our operations. As outlined in Section 4, we partnered with external experts in human rights and modern slavery to help us establish this awareness, identify potential risk areas, and review our current practices to inform a robust approach for future reporting periods. In doing so, we comprehensively assessed the current effectiveness of our practices and risk controls to inform next steps.

Looking ahead, our priority is to strengthen this foundation by completing a formal risk assessment (currently in progress), enhancing governance structures, and embedding risk management processes. We will also focus on addressing key exposure points, particularly those related to direct and indirect labour. Our action plan (see below) reflects the need to progressively integrate measurable indicators and success metrics into our program, ensuring we regularly evaluate the effectiveness of our actions in preventing and mitigating labour exploitation.

Modern Slavery Action Plan

We are at the beginning of our journey to address modern slavery risks and recognise the importance of taking meaningful action. During this reporting period, we focused on building internal awareness and engaging with external experts to better understand our obligations and potential risk areas. In the next reporting period, we will be developing an action plan to guide improved assessment and management of modern slavery risks. Key priorities for the upcoming reporting period include:

- 1. Finalise and adopt a 3-year action plan** – with focus on due diligence for site-based labour contractors, and better understanding risks and leverage in our procured goods and services.
- 2. Review relevant policies and update as needed** – including our Modern Slavery Policy, ESG policies and Whistleblower policy.
- 3. Set up ongoing governance** – including confirmed accountabilities/responsibilities and building capability.

SECTION 6: CONSULTATION & PRINCIPAL GOVERNING BODY APPROVAL

Hunter Mason NSW, the reporting entity, does not own or control any entities. Hunter Mason NSW, as well as other entities in the Group, is governed by four shareholders, all of whom are Directors of Hunter Mason NSW. In preparing this statement, all shareholders were consulted. As noted earlier, senior management functions and governance of modern slavery is centralised across the three group entities.

This statement was approved by the Directors and shareholders of Hunter Mason NSW Pty Ltd in their role as Principal Governing Body of Hunter Mason NSW on 15 December 2025. This statement is signed by Matthew Callender in his role as the Managing Director of Hunter Mason.

Name: Matthew Callender

Role: Managing Director of Hunter Mason NSW Pty Ltd

Date: 15 December 2025

APPENDIX A

TABLE OF RESPONSE TO MANDATORY REPORTING CRITERIA OF THE ACT

CRITERIA	DESCRIPTION	REQUIREMENT	LOCATION
1	Identify the reporting entity	Entity is required to identify the reporting entity that is covered by the statement - this includes Entity owned and operated subsidiaries.	Section 1
2	Structure, operations and supply chain	Entity is required to describe the structure, operations and supply chains of the reporting entity. During this process, the entity should specifically describe what components of their activities and relationships are categorised under own operations and supply chains.	Section 2
3	Risk of modern slavery in your operations	Entity is required to describe the risks of modern slavery in its activities taken by to organisation. The entity is only required to identify how risks of modern slavery may be present in the entity's own operation; it is not required to report on actual cases of modern slavery. However, the entity can report on specific risks if it wishes to do so or include an anonymised case study	Section 3
	Risk of modern slavery in your supply chain	Entity must report on the risks of modern slavery in the products and services that contribute to the entity's own products and services sourced in Australia or over-seas. This extends beyond direct suppliers. Entity is not required to certify that their supply chain is 'slavery free' but rather, is required to identify how modern slavery practices may be present in their supply chain.	Section 3
4	Actions taken to address risks	Actions taken to assess and address the identified risks including due diligence and remediation activities; policies, training, reviews, grievance mechanisms etc.	Section 4

CRITERIA	DESCRIPTION	REQUIREMENT	LOCATION
5	Assessing effectiveness	<p>As reporting years progress it is expected each annual statement will address how actions taken are being measured for effectiveness in remedying findings or causes of modern slavery.</p> <p>i.e. is transparency being upheld, spot checks conducted, is media being monitored for alternative information.</p>	Section 5
6	Consultation	The internal consultation process in preparing the Statement must be described including chain of responsibility.	Section 6