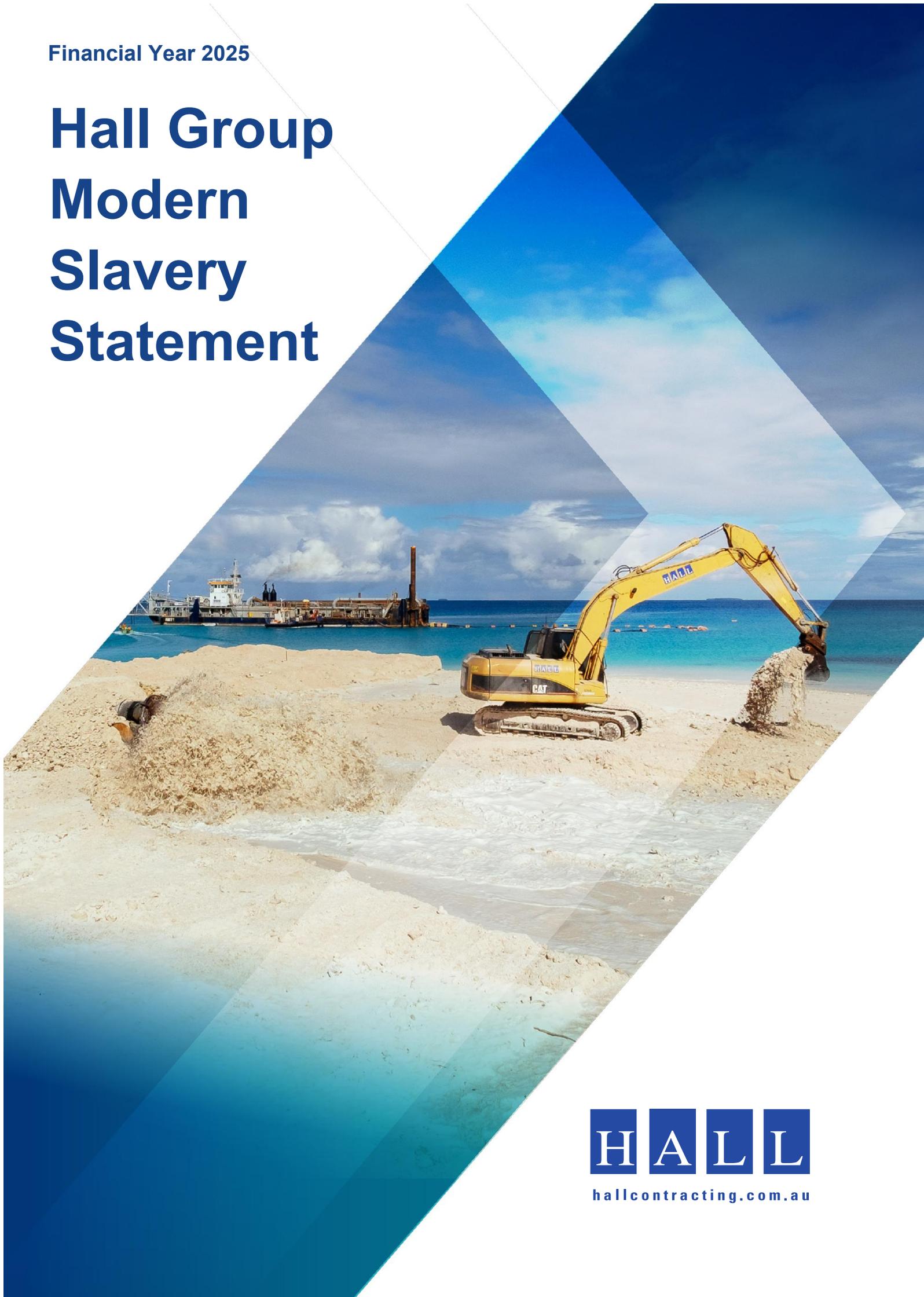


Financial Year 2025

Hall Group Modern Slavery Statement



hallcontracting.com.au

TABLE OF CONTENTS

About this Statement 3

Who We Are 3

Structure, Operations, and supply chain 5

Identifying and Managing Modern Slavery Risks 6

Supply Chain Assessment 7

Policy and Modern Slavery Framework..... 8

Whistleblowing at Hall 9

Modern Slavery Internal Training Module 9

Actions, Effectiveness and Continuous Improvement 9

Consultation with other Hall entities 10

Additional relevant Information 10

Approval..... 11

About this Statement

This Modern Slavery Statement, prepared in accordance with the *Modern Slavery Act 2018 (Cth)*, covers Hall Holdco Pty Ltd and its controlled entities. It outlines the Group's governance, risk assessment, due diligence, and remediation framework across all Hall business activities.

The Statement was developed in consultation with relevant Hall Group business units to ensure awareness of reporting obligations and alignment on planned actions.

This Statement has been prepared by the finance team in consultation with other internal stakeholders and approved by the Hall Board.

Who We Are

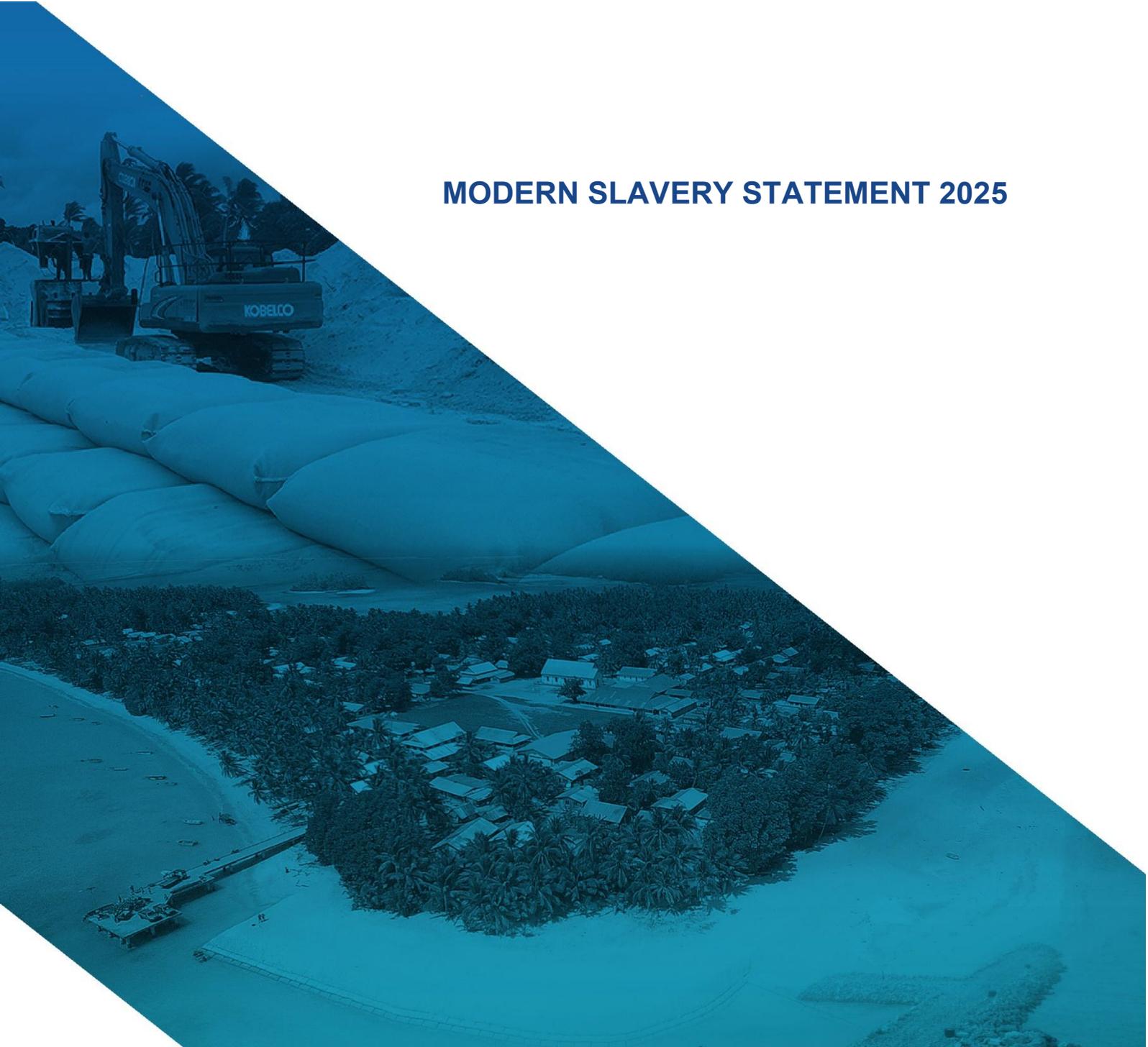
Hall Group (Hall) is a third-generation family business with over 79 years of operation and employ more than 200 employees across Australia, Fiji, Tuvalu and the Cook Islands. From humble beginnings, Hall has grown into one of Australia's leading dredging and marine civil contractors, delivering large-scale infrastructure projects across Australia, the Pacific Islands and Southeast Asia.

Our operations span dredging, marine civil construction, and tailings and water management, providing specialist services such as port development, seawalls, jetties, land reclamation and flood-mitigation works. These projects help build resilient communities and improve coastal protection across the regions in which we operate.

Hall is committed to respecting human rights and maintaining ethical employment and business practices throughout its operations and supply chain. We uphold a zero-tolerance approach to modern slavery and are dedicated to ensuring all workers are treated fairly, ethically and with respect. We maintain strong human resources and governance controls as part of our Integrated Management System. This includes rigorous onboarding processes, verification of working rights, regular reviews of wage and salary agreements, and biannual pay parity benchmarking against industry standards.

The parent company, Hall HoldCo Pty Ltd, is the reporting entity for this Statement. The Hall HoldCo Board of Directors is responsible for lodging the Group's Modern Slavery Statement and consulting with subsidiaries to assess operational and supply chain exposures

MODERN SLAVERY STATEMENT 2025



Structure, Operations, and supply chain

Entity	Structure	Operations	Supply Chain
Hall HoldCo Pty Ltd (Parent Entity) (ACN 623 029 005)	Holding company	National group of companies engaged in Dredging, Water & Tailings Solutions, Civil Infrastructure, Urban Development and Marine Civil Services for private and government clients across Asia, Australia and the Pacific.	The procurement of suppliers and materials is common across all of Hall businesses. Hall has a diverse supply chain that supports the multiple divisions in the Group; although all acting in accordance with the Hall values and vision. Our procurement spend is predominately from direct Australian Suppliers.
Hall BidCo Pty Ltd (ACN 623 029 292)	Non-operating Australian Company	None	
Hall Contracting Pty Ltd (ACN 009 786 065)	Australian Company	Hall Australian operating entity providing Dredging, Water & Tailing Solutions, Civil and Marine Civil services.	The supply chain includes the provision of construction materials and equipment, dredging parts and materials, fuels, corporate and professional services, labour services, PP&E and security services.
Hall Civil Contracting Pty Ltd (ACN 162 052 959)	Non-operating Australian Company	None	
Hall Civil Engineering Pty Ltd (ACN 602 726 410)	Non-operating Australian Company	None	
Hall CharterCo Pty Ltd (ACN 629 827 685)	Australian Company	Hall Equipment hire business. Hiring equipment to the Hall Group of operating entities.	Hall seeks to procure suppliers that share Hall values and ethics in relation to human rights. Hall understands that the risks relating to suppliers will vary depending on their industry, their location and the size of the entity.
Hall Plant Hire Pacific Pty Ltd (Co# ICA11983/2015)	Cook Islands Company	Hall Tug operations in the Pacific Islands	
Hall Contracting SDN BHD (Co # 106 6799 K)	Malaysian company	Ceased operations in 2025.	
Hall Contracting Pty Ltd (Fiji Branch)	Branch	Hall Pacific Island headquarters. Established in Fiji to conduct marine civil and dredging services in Fiji. Also provides logistics and procurement support for the Pacific region.	
Hall Contracting Pty Ltd (PNG Branch)	Branch	Hall PNG branch conducting operational activities in PNG (no activity in FY25).	
Hall Contracting Pty Ltd (Tuvalu Branch)	Branch	Hall Tuvalu Branch conducting operational and business development activities in Tuvalu.	
Hall Contracting Pty Ltd (Marshall Islands Branch)	Branch	Hall Marshall Islands Branch conducting operational and business development activities in The Republic of the Marshall Islands.	

Identifying and Managing Modern Slavery Risks

Hall recognises that the construction industry operates within a large, diverse and complex supply chain, where transparency is essential to addressing modern slavery risks. We are committed to eliminating modern slavery and uphold a zero-tolerance approach across all operations and supply chains, as outlined in our *Modern Slavery and Human Rights Policy*.

Respect for human rights is fundamental to how we operate. All Hall employees share responsibility for identifying, reporting, and preventing potential modern slavery risks.

Our supply chain supports multiple business divisions and primarily sources from Australian suppliers. It includes construction materials and equipment, dredging components, fuels, corporate and professional services, labour hire, personal protective equipment and security services. We seek to engage suppliers who align with our ethical standards and sustainable business practices, acknowledging that risk exposure varies depending on sector, geography and company size.

To strengthen our due diligence processes, Hall engages a third-party supplier screening program that monitors global adverse-media data for indicators of human rights violations, forced labour, and human trafficking. This enables early identification of potential risks and ensures prompt action is taken when concerns arise.

Hall is committed to continuously improving its understanding and management of modern slavery risks. Through our established Modern Slavery Framework, we have implemented key processes to identify, assess and manage risk across our operations and supply chain. This framework supports prioritised improvements in a coordinated and focused manner.

We regularly review our supplier list using a structured risk assessment criterion that considers industry, geography, and spend. Each supplier is categorised based on potential exposure to modern slavery risk, referencing the *Walk Free Foundation's Global Slavery Index*. Subcontractors are engaged via formal agreements, purchase order terms and conditions, and our *Supplier Code of Conduct*, ensuring clear expectations around ethical standards and compliance.

Hall focuses on identifying and remediating high-risk areas (Tier 1 Risk Assessment) and works directly with suppliers in higher-risk categories to strengthen compliance and transparency.

Supply Chain Assessment

Hall supply chain includes 1,431 direct suppliers who provided a variety of goods and services sourced from 22 countries and with a procurement addressable spend of \$188m in FY25. Key categories of spend include materials for construction projects, plant and labour hire, manufacturing, marine services and fuel. Most of the Hall procurement addressable spend (80%) was paid to Australian-based suppliers.

In total 90% of Hall annual procurement addressable spend is attributable to 276 (19%) “material” suppliers. A “material” supplier partner is defined as a supplier who provides goods and services that are considered material in nature to Hall, for which heightened contractual monitoring processes are in place.

Hall have procured items such as dredge machinery parts, vessel mobilisation costs, construction materials, from suppliers in countries such as Netherlands, China, Singapore, Philippines, Indonesia, New Zealand, United Arab Emirates, Vanuatu, Fiji and the Marshall Islands. All overseas payments represent 19% of the total procurement material suppliers in FY25.

Governance Structure

Hall Board has responsibility for establishing a framework of risk management across Hall Group. The Audit & Risk Committee (ARC Committee) assists the Board in its responsibilities relating to assessing the effectiveness of Hall overall risk management framework & supporting a prudent and risk aware approach to business decisions across the Group. The ARC Committee reviews a wide range of matters relating to financial and non-financial risks, including human rights related risks and those concerning modern slavery. The ARC Committee meet at least four times per year.

The corporate team along with the business units develop and implement our modern slavery strategy, manage our various initiatives and ongoing priorities relating to effectively identifying and managing modern slavery risks and due diligence activities (including managing our reporting obligation). The corporate team involved in the modern slavery strategy includes individuals from Human Resources, Executive team, and the Finance Department.



Policy and Modern Slavery Framework

Hall Group is committed to operating ethically, transparently, and with respect for human rights in every aspect of our business. Our governance framework integrates modern slavery prevention into our existing systems, ensuring that the principles of integrity, fairness, and accountability are embedded across our operations and supply chain.

Our policies collectively guide how we work — from ethical sourcing and responsible procurement to fair treatment of workers, diversity and inclusion, and zero tolerance for bribery, corruption, or unethical conduct. Together, they form the foundation for how we identify, assess, and address potential modern slavery risks.

Through our Modern Slavery Framework, we focus on prevention, detection, and response. This includes risk-based supplier assessments, due diligence during procurement and onboarding, and proactive engagement with suppliers to ensure alignment with our ethical and sustainability standards. We also provide internal training and resources to help employees recognise and report any potential risks.

As a Signatory Member of the United Nations Global Compact, Hall aligns its operations with the Ten Principles covering human rights, labour, environment, and anti-corruption. This reinforces our ongoing commitment to responsible business practices and strengthens our efforts to prevent and mitigate modern slavery across our operations and supply chains.

The Ten Principles of the United Nations Global Compact		
 HUMAN RIGHTS	1	Businesses should support and respect the protection of internationally proclaimed human rights.
	2	Businesses should make sure that they are not complicit in human rights abuses.
 LABOUR	3	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
	4	Businesses should uphold the elimination of all forms of forced and compulsory labour.
	5	Businesses should uphold the effective abolition of child labour.
	6	Businesses should uphold the elimination of discrimination in respect of employment and occupation.
 ENVIRONMENT	7	Businesses should support a precautionary approach to environmental challenges.
	8	Businesses should undertake initiatives to promote greater environmental responsibility.
	9	Businesses should encourage the development and diffusion of environmentally friendly technologies.
 ANTI-CORRUPTION	10	Businesses should work against corruption in all its forms, including extortion and bribery.

Hall remains committed to continuous improvement — regularly reviewing our processes, policies, and supplier relationships to ensure we meet both our legal obligations and our broader responsibility to the communities in which we operate.

Whistleblowing at Hall

Hall encourages employees and external stakeholders to report any improper conduct they encounter. All complaints are investigated in a fair and objective manner, including the involvement of external parties where appropriate.

Modern Slavery Internal Training Module

Hall has developed an internal Modern Slavery Training Module to build awareness and strengthen our ability to identify and manage modern slavery risks. The training is mandatory for all employees involved in procurement and outlines what modern slavery is, how it can occur within supply chains, and the role each employee plays in preventing it.

The module also covers Hall's governance processes, including escalation and reporting channels for suspected breaches, ensuring that any concerns are promptly and appropriately addressed.

Actions, Effectiveness and Continuous Improvement

Hall continues to strengthen its approach to identifying, assessing and addressing modern slavery risks across its operations and supply chains. Our due diligence processes are integrated into Hall's broader risk management framework and are reviewed regularly, with findings reported to the Audit and Risk Committee as part of the Group's ongoing governance and assurance activities.

An annual risk review considers all operational and supply chain exposures, including those relating to modern slavery, to ensure that controls remain effective and responsive to evolving conditions. During this reporting period, Hall focused on enhancing the Modern Slavery Framework—refining governance structures, supplier due diligence, and the integration of modern slavery considerations into business systems and procurement processes.

Hall acknowledges the importance of measuring the effectiveness of our actions. We assess this through supplier engagement levels, compliance outcomes, audit results, and feedback from the operational and corporate functions. This process ensures our controls remain both practical and impactful.

Progress to Date

Milestone	Performance Indicator	Completion	Status / Target 2025
Policies	Modern Slavery Statement	Published FY2020	Ongoing
	Modern Slavery Policy	Published FY2021	N/A
	Human Rights Policy	Published FY2021	N/A
	Supplier Code of Conduct	Published FY2021	N/A
Due Diligence	Signatory Member – UN Global Compact	FY2021	Ongoing
	Modern Slavery Questionnaire	Published FY2020	Ongoing
	Ethical Supplier Screening	Complete FY2023	Ongoing
	Supplier Code and Modern Slavery Clauses in Subcontractor Agreements	Complete FY2023	N/A
	Enhanced Due Diligence for High-Risk Regions and Industries	FY2024 – Working Group Deliverable	Ongoing
	Training and Education	Internal Modern Slavery Training Module	Published FY2021
Company Policies Issued at Onboarding		Continuous	Ongoing

Consultation with other Hall entities

This statement is made pursuant to the Act and constitutes Hall Modern Slavery statement in respect of the 30 June 2025 financial year and is approved by the principal governing body of Hall Group, being its Board of Directors. The related Hall entities all have the same Board of Directors, and therefore Directors of all related entities have been consulted with in preparing this Modern Slavery Statement. The parent company of the Hall Group is Hall Holdco Pty Ltd which is the Reporting Entity for this statement.

Additional relevant Information

All Hall staff have a responsibility to prevent, identify and report any concerns they may have in relation to modern slavery within Hall operations and supply chains. Such concerns are to be reported to the appropriate manager or otherwise in accordance with Hall Whistle Blower Policy. All reports of concerns relating to modern slavery will be treated with sensitivity, confidentiality and will be taken seriously.

Approval

Approved by Hall Group Board of Directors, dated 19 December 2025.

Signed in accordance with the requirements of the *Modern Slavery Act 2018* (Cth);



Cameron Hall
CEO
19 December 2025