



Modern Slavery Statement

Company Profile

Hanlon Industries Pty Ltd, established in 2000, is a family-owned company registered in Victoria, specialising in steel fabrication, labor hire, and commercial construction. The head office/corporate office in Geelong. We are dedicated to delivering high-quality services while maintaining ethical and social standards in all aspects of our operations and supply chain.

Purpose and Commitment

Hanlon Industries is committed to combating modern slavery and human trafficking. This policy outlines our approach to identifying, mitigating, and addressing risks associated with modern slavery in compliance with the **Modern Slavery Act 2018**. We aim to foster an ethical and fair working environment across all areas of our business.

Understanding Modern Slavery

Modern slavery involves severe exploitation that deprives individuals of their freedom, including:

- Human Trafficking
- Forced Labor
- Debt Bondage
- Forced Marriage
- Child Labor

Organisational Structure

Hanlon industries is privately owned with following entities being part of the parent organisation:

1. Hanlon Industries Pty Ltd. (ABN: 59 144 623 969)
2. Hanlon Industries (QLD) Pty Ltd. (ABN: 77 636 430 450)

The Board of Directors sets strategic directions for Hanlon Industries and oversees the overall governance of the organisation. The Executive Team, which includes the Managing Director, Executive Director, Head of Finance, General Managers, Head of Systems and Compliance, and Head of Preconstruction, is responsible for implementing this direction, managing day-to-day operations, and ensuring that our governance, risk, and compliance obligations are effectively met.



Operations

Hanlon Industries operates across Australia and New Zealand. In Australia, our locations include Geelong (Victoria), Narangba (Queensland), Alexandera (New South Wales), and Malaga (Western Australia).

We deliver a broad range of products and services spanning design, engineering, project management, metal fabrication, and building works. Our capabilities support the construction, infrastructure (including road, bridge, rail, and port projects), utilities, and digital media advertising sectors.

All operations take place in Australia and New Zealand, jurisdictions consistently ranked among the lowest-risk regions on the Walk Free Global Slavery Index. The risk of modern slavery within our direct operations is therefore minimal. This low-risk profile is further supported by Hanlon Industries' commitment to providing a safe, healthy, and fair working environment in line with our governance frameworks and policies.

Supply Chain Overview

- Local Sourcing: our suppliers are Australian based, operating under robust local labour laws.

Measurable Target

To strengthen our approach to identifying and managing modern slavery risks, Hanlon Industries has established the following measurable target:

- **By 2028**, achieve 100% compliance verification of all Tier 1 suppliers through the New Supplier Form process and/or third-party audits, ensuring alignment with Hanlon Industries' modern slavery standards.

Interim milestones:

- **2026:** Verify compliance for 50% of Tier 1 suppliers.
- **2027:** Verify compliance for 75% of Tier 1 suppliers through completed New Supplier Forms or third-party audits.

Progress against this target will be monitored and reported annually in Hanlon Industries' Modern Slavery Statement to ensure transparency and to highlight any areas requiring further action.

These milestones are supported by broader initiatives outlined in the Monitoring and Continuous Improvement section. Together, this roadmap strengthens Hanlon Industries' capacity to proactively address modern slavery risks and maintain meaningful, long-term progress toward our commitment.

Risk Assessment and Mitigation

Key Risks Identified:

- Sector Risks: Steel fabrication and raw material sourcing may involve informal labour practices in high-risk regions.
- Geographic Risks: International suppliers in countries with weaker regulatory frameworks.
- Subcontractor Risks: Limited transparency in second and third-tier suppliers.



Mitigation Framework:

1. Low-risk Suppliers (e.g., local suppliers):

- Regular review of compliance policies.
- Spot checks during annual supplier assessments.

2. Medium-risk Suppliers (e.g., suppliers reliant on subcontractors):

- Supplier self-assessment forms.
- Proof of compliance with ethical labour practices.

3. High-risk Suppliers (e.g., international sourcing):

- Third-party audits annually.
- Corrective Action Plans (CAPs) to address non-compliance.
- Capacity-building initiatives, including training programs.

Risk Management Approach

Supplier Risk Assessment & Assessment Process

Hanlon Industries will conduct risk assessments for all suppliers classifying them as **Low, Medium, or High Risk** based on the following factors:

- Geographic location.
- Industry sector vulnerability.
- Workforce composition and policies.
- Historical incidents of modern slavery or unethical practices.

New Suppliers: Complete the *New Supplier Assessment Form* and provide:

- Ethical sourcing policies.
- Confirmation of compliance with local labour laws.
- Proof of insurances and certifications (ISO 9001, ISO 45001, etc.).

Existing Suppliers: Review of ethical and legal compliance, prioritising medium and high-risk suppliers.

Suppliers are assessed using the information and documentation they provide, with scores assigned based on a 100-point system.

Governance and Responsibilities

Governance Structure:

- Employees: Report concerns through established channels.
- Managers: Monitor departmental compliance and support reporting processes.
- Procurement Team: Conduct supplier risk assessments and ensure ethical sourcing.
- Senior Management: Review policy effectiveness and oversee corrective actions.



Related Policies:

- Whistleblower Policy
- Code of Conduct
- Anti-Bribery and Corruption Policy
- Equal Opportunity Policy
- Sustainability Policy

Consultation with Owned or Controlled Entities

Hanlon Industries has engaged with owned or controlled entities to ensure compliance with the Modern Slavery Act 2018. This includes sharing information, providing training, and collecting feedback to support the preparation of the Modern Slavery Statement.

If no such entities exist during the reporting period, this criterion does not apply.

Actions Taken:

1. **Supplier Engagement:** Conducted initial and ongoing due diligence on high-risk suppliers.
2. **Training Programs:** Delivered targeted training to employees on identifying modern slavery indicators focusing on recognizing risks and reporting procedures. This includes online training, awareness emails and presentations.
3. **Reporting Mechanisms:** Established confidential channels for reporting concerns about modern slavery risks.

Monitoring and Continuous Improvement

Hanlon Industries is dedicated to fostering continuous improvement in addressing modern slavery risks through the following initiatives:

1. **Annual Reviews:** Evaluate supplier compliance, particularly high-risk suppliers, and publish findings in an annual Modern Slavery Statement.
2. **Stakeholder Engagement:** Participate in sector-wide initiatives to combat systemic risks, share best practices, and promote transparency.

Action Roadmap

The following roadmap complements Hanlon Industries' measurable targets by outlining broader actions that will strengthen our ability to identify, address, and mitigate modern slavery risks across our operations and supply chain.



2025 Initiatives:

- **Expand training programs** for employees and key suppliers, with a focus on increasing modern slavery awareness and improving risk identification and mitigation capabilities.
- **Enhance supplier onboarding processes** by implementing a standardised compliance checklist to ensure all new suppliers meet Hanlon Industries' modern slavery and ethical sourcing expectations.

Reporting and Remediation

Reporting Mechanism:

- Confidential channels are available to employees and stakeholders to report concerns.
- Reports are investigated, and findings documented.

Corrective Action Plans (CAPs):

- Engage with suppliers to address concerns.
- Implement measures such as improving working conditions or terminating unethical subcontractors.
- Collaborate with external organisations to support affected individuals.

Assessment of the Effectiveness

- Annual senior management review of the Action plan.
- Integrating the checks with the internal audit and compliance Schedule.

Modern Slavery Statement

Hanlon Industries will publish this Modern Slavery Statement each year, outlining the risks identified, the actions taken to address them, and the outcomes of our policies and processes. Every statement will be reviewed and approved by senior management and made publicly available on the company website.

Commitment

Hanlon Industries is committed to upholding human rights and eliminating exploitation in all its forms. Through this policy and our program of continuous improvement, we aim to strengthen our systems, promote responsible business practices, and contribute to a safe, ethical, and sustainable future across our operations and supply chain.

Current review Outcome

We confirm that we are unaware of any cases of modern slavery within Hanlon Industries or our supply chains.

Approval

This statement has been prepared in compliance with Section 16 of the Modern Slavery Act 2018 and has been approved by Hanlon Industries Pty. Ltd Managing Director to address the risks of modern slavery and human trafficking within its business operations and supply chain. Date of approval: 20th October, 2025.