



Modern Slavery Policy

HH Civil is committed to limiting the risk of modern slavery occurring within its own business, infiltrating its supply chains, or through any other business relationship.

The policy applies to all persons working for or on behalf of the Company, in any capacity, including employees, directors, officers, agency workers, contractors, consultants, and any other third-party representative.

HH Civil expects all who have, or seek to have, a business relationship with the Company to familiarise themselves with this policy and to act in a way that is consistent with its values.

The Company will only do business with organisations that fully comply with this policy or those who can provide evidence that they are taking verifiable steps towards compliance.

Under the Modern Slavery Act 2018 (Cth) (the Act), 'modern slavery' incorporates conduct that would constitute an offence under the human trafficking, slavery and slavery-like offence provisions set out in Divisions 270 and 271 of the Criminal Code Act 1995 (Cth).

What Do We Mean by Modern Slavery?

Modern slavery can take many forms; it is a complex and multi-faceted problem. The Modern Slavery Act 2018 (Cth) covers four key criminal activities:

Slavery: where ownership is exercised over an individual

Servitude: involves the obligation to provide service imposed by coercion

Forced and compulsory labour: all work or service not voluntarily performed, which is obtained from an individual under the threat of force or penalty

Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them

How HH Civil Seek to Embed the Anti-Slavery Policy in Practice

To underpin the commitments laid out in this policy, HH Civil aims to where appropriate, as informed by the risk assessment, the Company will engage directly with new suppliers in respect of the Anti-Slavery Policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses.

The Directors are responsible for ensuring that their subsidiary complies with the provisions of this policy in the day-to-day performance of their roles.

This notice reflects the Company's current practice. HH Civil will review and update the policy from time to time to reflect legal and operational requirements.

Approved by:

A handwritten signature in black ink, appearing to read 'DH' followed by a stylized flourish.

Darren Hurson
Director
HH Civil Pty Ltd

Date: 31/03/2025