

HMA



MODERN SLAVERY STATEMENT



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HMA MODERN SLAVERY STATEMENT

Our Structure, Operations and Supply Chain

This Modern Slavery Statement (MSS) is made pursuant to the **Australian Federal Government, Modern Slavery Act 2018**, sets out the actions taken by HMA Group to incorporate these requirements into our statement for the financial year **1 July 2023 to 30 June 2024 (FY2023/24)**.

Our businesses in respect of our related body corporate, HMA Group, as of 1st July 2022

- Halley and Mellowes Pty Ltd, ABN: 83 000 558 627 & subsidiaries HMA Geotechnical, HMA Materials Handling
- HMA Wear Solutions Pty Ltd, ABN 69 002 407 730
- Diamond Power (Australia) Pty Ltd, ABN 64 008 425 214 & subsidiary HMA Power Generation
- HMA Instrumentation Pty Ltd, ABN 42 058 605 959
- HMA Flow and Industrial Pty Ltd, ABN 68 092 292 718

The HMA Group has been providing industrial solutions since 1966. We manufacture, distribute and service a wide range of capital plant and equipment to a diverse range of industries. The scope of the HMA Group products and services includes sales, design, source, manufacture, supply, assemble, install, commission, test and repair of plant and equipment, as well as providing training, project management and consultancy.

The majority of the HMA Group 's products and services businesses operate in Australia, with branch offices in New Zealand, Indonesia, South Africa. The HMA Group is proud of the valuable contribution our National and International operations make to our customers and our business. We recognise that International operations can create a perception of an elevated risk of modern slavery. As part of our risk management process, we will identify, assess, and evaluate the level of risk across all our operations.

The HMA Group sells a wide range of capital plant and equipment across many Key Industries which include oil, gas refining and petrochemical, water, waste, paper, mining, industrial, power generation, pharmaceutical, food, railway, lifting, and materials handling equipment, a vast range of valves and control solutions, measurement and control solutions for the process and marine industries and geotechnical instrumentation.

The HMA Group have numerous supply chain relationships, with over 4000 suppliers, the source of the products, goods, and services we procure is spread across our National and International suppliers, who supply OEM products, branded products, manufactured goods, raw materials, and services.

Our main categories of procurement include:

- Direct Procurement (manufacturer)
- Goods Procurement (retail)
- Logistics and Freight
- Professional Services
- Information, Communication and Technology

The HMA Group source from locations worldwide as part of our supply chain, which includes but not limited to Australia and New Zealand, Canada, China (PRC), Czechia, India, Indonesia, Israel, Korea, South Africa, South Korea, Taiwan and USA, these suppliers provide manufactured goods and goods procurement.

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Governance and Policies

HMA Modern Slavery Policy was developed to integrate and reference the Australian Federal Government, Modern Slavery Act 2018 requirements. As stated in the HMA Modern Slavery Policy, HMA does not tolerate any violation of human rights, such as human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting, child labour (child exploitation).

In addition, the HMA Modern Slavery Policy and the HMA Modern Slavery Statement have been embedded into the HMA Code of Business Conduct, which applies to all staff and the HMA Group is striving to ensure that these principles are respected and upheld by all stakeholders including our supply chain. HMA has a robust corporate governance and risk management framework in place, to support our Board of Directors and Management Team in our risk mitigation strategies, operational processes and to ensure that we are taking all reasonable steps to fulfil our corporate responsibility in respect to human rights and to address potential modern slavery risk areas, these include,

HMA Governance Policies

- HMA Code of Business Conduct
- HMA Modern Slavery Policy
- HMA Modern Slavery Statement
- HMA Code of Ethics
- HMA Equal Employment Opportunity Policy
- HMA Discrimination Harassment & Bullying Policy
- HMA Grievance and Complaints Procedure
- Employee Counselling Support Program

Due Diligence and Risk Management

In relation to the risk of modern slavery in our business and supply chain, HMA businesses have a risk-based approach to modern slavery due diligence and ethical sourcing, and through the HMA Group implemented risk management processes, we have taken the following steps to identify, assess, mitigate, and monitor potential risk areas where we could be exposed to human rights concerns.

As we continued to develop our ethical sourcing risk identification through FY2023/24, we recognised that our National and International suppliers, of our OEM and branded products, was an area where we can make the most significant contribution. During this process, we identified our major Tier One suppliers, 120, these sectors included the HMA Groups suppliers, from Australia and International suppliers based in China (PRC), Czechia, India, Israel, Korea, South Africa, South Korea, Taiwan, USA, to name a few, who provide manufactured goods and goods procurement.

Additionally, we commenced the introduction of the HMA Modern Slavery Self-Assessment Questionnaire (SAQ), which is designed to help us determine our suppliers’ policies, procedures, controls, and maturity levels regarding human rights in key areas, such as: identification of modern slavery risks; foster collaborative efforts between HMA and our suppliers to address these risks; improve transparency; and identify areas for further due diligence.

Additionally, we continued to re-issue the HMA Modern Slavery Self-Assessment Questionnaire (SAQ), designed to help us determine our suppliers’ policies, procedures, controls, maturity levels regarding human rights in key areas, such as: identification of modern slavery risks; to foster collaborative efforts between HMA and our suppliers to address these risks; to improve transparency; and identify areas for further due diligence.

During FY2023/24 HMA has focused on encouraging our Teir One Suppliers to participate and return the HMA Modern Slavery Self-Assessment Questionnaire’s (SAQ) and to June 30th, 2024, 72 suppliers had replied. To determine and measure our supplier’s maturity levels we reviewed and evaluated the 72 SAQ’s, to identify and understand any potential for exposure to any human rights violation/s, identify any ‘High Risk ESG sectors or sensitive areas.’, as well determine our suppliers’ Modern Slavery awareness, controls, and compliance in key areas.

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From our initial review and evaluation of the 72 SAQ's, the potential for Modern Slavery risks and compliance were identified, within our supply chains and were categorised into three response criteria #.

Tier One Suppliers SAQ's returned and response categories.

0 Good practice **33** Framework (46%) **39** No Framework (54%)

Framework, or evidence of modern slavery being addressed from the SAQ response provided. For example, a Modern Slavery Policy, Modern Slavery Statement, Supplier Code of Conduct, Code of Business Ethics & Declaration of Human Rights.

No Framework, or evidence of modern slavery being addressed from the SAQ response provided. For example, no Modern Slavery Policy, Modern Slavery Statement, Supplier Code of Conduct, Code of Business Ethics & Declaration of Human Rights was evident.

References:

The Australian Border Force (ABF): Modern Slavery Act Supplementary Guidance: Good Practice Examples of Mandatory Reporting Criteria Four), use [Resources \(modernslaveryregister.gov.au\)](https://www.modernslaveryregister.gov.au) Guidance Material (11).

During the next FY2024/25, we will continue to issue the HMA SAQ's to our Tier One suppliers and review and evaluate our returned SAQ's to maintain our focus on identifying any high-risk areas, as well as ensure we focus on any newly introduced Tier One suppliers, in our supply chain, as part of our risk audit process, risk review and risk mitigation strategy. Our aim is to ensure that human rights are understood, respected, and upheld across our business operations and supply chains.

All our reporting entities are governed by a common Board of Directors and as part of the ongoing management and implementation of this statement. Our Modern Slavery Working Group in collaboration with the HMA Group Management Team will work to ensure our entities are informed and are aware of their contribution requirements, to ensure they facilitate continuous improvement, the requirements of this statement and its associated processes.

During our reporting periods, we will continue to engage and consult with each of our reporting Entities and business leaders, to maintain a focus on our expectations, awareness of our supplier's visibility, and modern slavery risk areas.

HMA considers the risk of modern slavery within its direct business operations to be low. However, HMA recognises that through our supply chain and customers, it can be indirectly exposed to the risk of a human rights violation.

HMA Controls Framework

- Modern Slavery Working Group, (Risk Steering Committee)
- HMA Risk Register, for example, environmental, social and governance (ESG) risks
- Internal audit program, including ESG risks.
- Seek specialist advice.
- Modern Slavery due diligence assessments

Supply Chain Management

- HMA Modern Slavery Supplier Self-Assessment Questionnaire (SAQ)
- Supplier Prequalification Questionnaire
- Contract Terms and Conditions
- Purchase Conditions
- Procurement Process and Quality Procedures for Suppliers

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Areas of Action

During the next FY 2024/25 we will continue to plan and review our environmental, social and governance (ESG) risks on HMA's supply chain, Tier One suppliers, to identify any potential for exposure to any human rights violation, including a review of any 'High Risk ESG sectors and sensitive areas', which will be used to determine suppliers and customers that may have a higher risk of ESG issues. Also, as a matter of routine work on identifying where any additional ESG risk assessment and due diligence maybe required. For Human Rights, these sectors include the HMA Groups suppliers, based in Australia and International suppliers in China (PRC), Czechia, India, Israel, Korea, South Africa, South Korea, Taiwan, USA, to name a few, who provide manufactured goods and goods procurement.

An ongoing review of our supply chain, Tier One suppliers, will assist in identifying the sectors with the highest potential to expose HMA to human rights risks. Our ongoing actions being undertaken to minimise the risk of modern slavery within the HMA Group's supply chain included:

- continue to request our suppliers to participate and complete our SAQ, to work with us and to help identify any human rights risk areas within our supply chains.
- identify and focus on our supply chain ESG risks and monitor and review suppliers in HMA's 'High Risk ESG sectors and sensitive areas'.
- continue to conduct ESG risk evaluation of our suppliers and their SAQ's to ensure they provide HMA with information on how they manage their supply chain related ESG risks and identify any human rights risks.

HMA also recognises that human rights can be a potential risk in relation to our supplier's activities. HMA's risk management policies and processes incorporate a risk-based approach to assess human rights risk (incorporating modern slavery and human trafficking) and form a part of the HMA Risk Register, risk assessment process and due diligence.

Assessing Actions and Effectiveness

HMA will continue to improve the following activities and focus areas, for not only meeting our requirements of the Modern Slavery Act, but for also measuring and evaluating the effectiveness of our actions through key performance indicators (KPI's), to assist in identifying continuous improvement across our business.

Our activities and focus areas include:

- continue to review our governance and due diligence processes, to facilitate consultation and improvement of the HMA Modern Slavery Statement covering all HMA Group subsidiary reporting entities to meet the requirements of the Act.
- carryout a gap analysis of the HMA Group's current policies, procedures, and practices against the requirements of the Act.
- continue to actively engage in the consultation processes, in the education of our workers to meet our requirements of the Act and use Modern Slavery guidance materials to identify improvement areas.
- Review, Tier One suppliers SAQ's to identify if they are aligned to HMA's 'High Risk ESG sectors and sensitive areas',
- Suppliers with a higher likelihood of ESG risk, identify on the HMA Risk Register, and evaluate as part of our risk assessment process and due diligence.

Against each of these focus areas our KPI's used to assess the effectiveness of our actions, include:

- the percentage of Teir One Suppliers who have completed and returned HMA's SAQ.
- the number of HMA workers who have completed modern slavery education, training, and awareness.
- the percentage of Teir One Suppliers whose SAQ is evaluated as being in the following response categories, good practice, framework, or no framework.

Over our next reporting period, we will continue to review and enhance these KPIs and develop our metrics to assess the effectiveness of our plans, actions, and continuous improvement across our business and supply chain.

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Education, Training, Awareness

Education, training, awareness, and communications about human rights and HMA Modern Slavery Policy, HMA Modern Slavery Statement and risk mitigation strategies was made available to our Entities and their business leaders in the last FY.

HMA plans to continue to actively engage in the consultation processes, in the education training and awareness of our workers to meet the requirements of the Act. Through direct engagement and consultation with our business leaders and workers, deliver risk awareness training to maintain a focus on our expectations, increase awareness and monitoring of our supplier’s visibility and of human rights risks areas. And, where required consult with relevant industry groups, to create dialogue, identify improvement areas and risk mitigation best practice.

As our strategies and controls mature through our Australian Entities, we will continue to develop and improve our knowledge of our environmental, social and governance (ESG) risks, information on human rights, ethical sourcing and the standards expected. This will enable us to target and program a roll out for HMA’s International branches in New Zealand, Indonesia, and South Africa.

Grievance, Feedback Mechanisms

HMA Grievance and Complaints Procedure that allows workers, suppliers, customers and third parties to HMA to raise concerns in a confidential manner. This channel is available for reporting human rights related concerns. Where grievances or concerns are raised, we investigate and address them in an appropriately determined manner. This may include engagement with suppliers, customers, and other stakeholders. In these cases, we take steps to understand the issue(s) and take planned and appropriate action. This may involve referring the matter to the appropriate authorities (in the case of allegations of human rights) or engaging with the stakeholders about areas of the organisation that we supply to.

In FY2023/24, HMA did not identify any instances of human rights or human trafficking associated directly with our own operations, or through sourcing-related risk assessment in relation to HMA’s Teir One Suppliers and no modern slavery and/or human trafficking concerns were raised with HMA about suppliers or customers through our feedback channels.

Should any concerns or trends be identified, HMA will conduct any investigations in accordance with regulatory requirements, policy, and procedures, which may include raising of reports on suspicious matters with Human Rights Commission which can limit the HMA Group’s ability to publicly disclose details of reported matters.

Stakeholder Engagement, Collaboration

HMA is committed to responsible leadership and is about making sustainable business decisions which consider the interests of all stakeholders, including shareholders, employees, clients, business partners, suppliers, governments, the community, the environment, and future generations.

HMA is committed to collaborating with our stakeholders, through listening, co-operation, and best practice strategies, to better identify and understand their expectations and how these might effect change, to help eradicate modern slavery or human rights violations. For example, engage with stakeholders to provide their views, share their experiences and expectations.

This statement was approved by the Board of Directors of HMA International Pty Ltd.

Signed

Simon Burns
Managing Director
3rd December 2024

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