



ECOVE GROUP

VOLUNTARY MODERN SLAVERY STATEMENT

Effective Date: 5 January 2026

INTRODUCTION

This Voluntary Modern Slavery Statement has been prepared by Ecove Group Pty Limited (ABN 66 065 207 918) in accordance with the Modern Slavery Act 2018 (Cth).

Ecove Group is a property development company headquartered in Sydney Olympic Park, NSW. Founded in 1994, Ecove Group delivers large-scale mixed-use high-rise projects across New South Wales.

Ecove Group is committed to preventing modern slavery across all its operations and supply chains.

1. REPORTING ENTITY

Details	Information
Company Name	Ecove Group Pty Limited
ABN	66 065 207 918
ACN	065 207 918
Registered Address	Level 1, 3 Australia Avenue, Sydney Olympic Park NSW 2127
Operations	Property Development Services in New South Wales, Australia

This statement covers Ecove Group Pty Limited and its subsidiary entities.

2. OPERATIONS AND SUPPLY CHAIN

Business Activities

Ecove Group is a property development company that undertakes the full spectrum of the property development cycle for large-scale mixed-use high-rise projects. The company's activities encompass site acquisition and due diligence, feasibility analysis and master planning, design and planning approvals, construction management and delivery, development financing, sales and marketing, and post-completion settlement and handover.

Operations

- **Operational Scope:** Property development services including project management, design coordination, planning and approvals, construction management, financing, sales and marketing, legal services and corporate operations
- **Geographic Scope:** All projects undertaken by Ecove Group are located in New South Wales, Australia
- **Employment Practices:** Full compliance with Australian employment law, including Fair Work Act requirements, award rates and entitlements, superannuation obligations and workplace health and safety protections

Supply Chain

Ecove Group engages a diverse range of suppliers and contractors to deliver its property development projects:

Category	Supplier Type	Modern Slavery Risk Level
Construction Services	Head contractors, subcontractors, trades (electrical, plumbing, mechanical, civil, carpentry, bricklaying, steel fixing, concreting)	High
Building Materials	Concrete, steel, timber, bricks, tiles, glass, fixtures, fittings, mechanical and electrical equipment, plumbing and sanitaryware	Moderate to High
Labour Hire Services	Temporary and project-based construction workers	Moderate to High
Professional Services	Architects, engineers, quantity surveyors, town planners, environmental consultants, legal advisors	Low
Plant and Equipment	Construction machinery, tools, scaffolding, cranes, vehicles, site accommodation	Moderate
Corporate Services	IT services, financial services, insurance, advertising and marketing	Low

The majority of Ecove Group's suppliers are based in Australia. However, building materials and manufactured goods may be sourced from global markets.

3. MODERN SLAVERY RISKS

Risk Assessment

Low Risk in Direct Operations:

Ecove Group's direct operations present low inherent modern slavery risk:

- All operations are based in New South Wales, Australia, a low-risk jurisdiction with robust labour law protections
- The workforce comprises skilled professionals in office-based roles
- Employment practices comply with Australian workplace laws and standards

Higher Risk in Supply Chains:

The property and construction sector is recognised as carrying inherent modern slavery risks. Ecove Group has identified the following key risk areas in its supply chains:

1. Construction Labour and Subcontracting

Risk Level: High

The construction industry involves complex subcontracting arrangements that may create modern slavery risks:

- Use of migrant workers on temporary visas who may be vulnerable to exploitation
- Engagement of labour hire providers with limited visibility of employment practices
- Multiple layers of subcontracting creating reduced transparency
- Pressure to meet tight project timelines and budgets that may incentivise cost-cutting through exploitative labour practices

Potential forms of exploitation:

- Underpayment of award rates and entitlements
- Debt bondage through excessive recruitment fees or visa charges
- Excessive working hours without appropriate compensation
- Unsafe working conditions
- Deceptive recruitment practices

2. Imported Building Materials

Risk Level: Moderate to High

Ecove Group may use building materials in construction that are imported from outside Australia. Where materials are sourced internationally, there are inherent risks associated with extended supply chains:

- Limited visibility into labour practices at raw material extraction sites such as quarries, mines, forestry operations, and brick kilns
- Manufacturing facilities in jurisdictions with weaker labour law enforcement
- Complex multi-tiered supply chains involving numerous intermediaries

Potential forms of exploitation:

- Forced labour in raw material extraction and manufacturing
- Child labour in quarries, brick kilns, and manufacturing facilities
- Debt bondage in production facilities
- Hazardous working conditions without adequate safety protections
- Excessive working hours without fair compensation

Ecove Group recognises the importance of ensuring that materials are ethically sourced from reputable suppliers with transparent and accountable supply chains that do not exploit workers in the regions where materials are produced.

3. Labour Hire Providers

Risk Level: Moderate to High

The use of labour hire providers to supply temporary and project-based workers presents modern slavery risks:

- Migrant workers reliant on labour hire providers for visa sponsorship
- Potential for deceptive recruitment practices and false promises
- Excessive fees charged to workers creating debt bondage
- Limited visibility into labour hire providers' employment practices

Potential forms of exploitation:

- Charging workers excessive recruitment, visa, or training fees
- Underpayment of award rates and entitlements
- Threatening workers with visa cancellation to compel work
- Deceptive employment terms and conditions

4. Plant and Equipment

Risk Level: Moderate

Construction plant and equipment may be manufactured overseas in jurisdictions with elevated modern slavery risks:

- Manufacturing facilities in countries with weaker labour protections
- Limited visibility into labour conditions at manufacturing sites

Potential forms of exploitation:

- Forced labour in manufacturing facilities
- Excessive working hours
- Unsafe working conditions

5. Corporate Procurement

Risk Level: Low to Moderate

Corporate procurement of IT hardware, electronics, and office supplies may involve products manufactured in jurisdictions with modern slavery risks:

- Electronics manufacturing in facilities with known labour rights concerns
- Complex global supply chains with limited transparency

4. ACTIONS TO ADDRESS MODERN SLAVERY

Ecove Group has implemented a comprehensive framework to identify, assess, and address modern slavery risks across its operations and supply chains. This framework is integrated into the company's Integrated Management System (IMS) that governs its operations.

Governance and Accountability

Ecove Group's senior management team has responsibility for overseeing modern slavery risk management and approves this Voluntary Modern Slavery Statement and associated policies. A cross-functional working group has been established to implement and monitor modern slavery initiatives, including conducting supplier risk assessments, reviewing due diligence findings, overseeing corrective action plans, and coordinating training and awareness programs.

Integrated Management System (IMS)

Ecove Group has developed a comprehensive Integrated Management System (IMS) that governs its operations and embeds modern slavery risk management throughout the business. The IMS ensures consistent application of standards across all projects and activities, with modern slavery due diligence systematically applied throughout the property development cycle.

Policies and Standards

Ecove Group has implemented the following policies to prevent and address modern slavery:

1. **Modern Slavery Policy:** Establishes commitment to preventing modern slavery across operations and supply chains
2. **Supplier Code of Conduct:** Sets expectations for all suppliers regarding labour practices and compliance with employment laws
3. **Procurement Standards:** Integrates modern slavery risk assessment into procurement decision-making
4. **Whistleblower and Grievance Policy:** Provides confidential mechanisms for reporting modern slavery concerns
5. **Employee Code of Conduct:** Requires all staff to uphold ethical standards and prohibits involvement in modern slavery
6. **Subcontracting Policy:** Establishes requirements for head contractors to manage subcontracting chains and conduct due diligence
7. **Workplace Health and Safety Policy:** Commits to safe working conditions for all workers

Subcontractor Management and Supply Chain Control

Ecove Group implements a tiered approach to managing subcontractor risks and ensuring modern slavery governance is applied throughout the supply chain.

Tier 1 Control (Head Contractors):

- Ecove Group's standard construction contracts require head contractors to incorporate modern slavery compliance clauses and ensure compliance with relevant Modern Slavery Laws.
- Head contractors must maintain a current register of subcontractors and labour hire providers engaged on Ecove Group projects, provided to Ecove Group upon request.
- Head contractors are contractually obligated to conduct due diligence on subcontractors before engagement, using Ecove Group's supplier assessment questionnaire as the minimum due diligence standard.
- Ecove Group retains the right to audit subcontractor compliance through site inspection, document review or third-party verification.

Tier 2+ Visibility and Enhancement:

- Head contractors are required to provide Ecove Group with notification of new subcontractors and labour hire providers as they are engaged during project delivery.

- Labour hire providers (Tier 2) are designated as high risk suppliers under Ecove Group's risk assessment framework and subject to enhanced due diligence, including verification of licensing, confirmation of written contracts in worker's primary language, assurance of Fair Work Act compliance on recruitment fees and verification of grievance mechanism access.

Contractual Terms and Enforcement:

- Modern slavery clauses and subcontractor governance requirements are documented in Ecove Group's Subcontracting Policy.
- Non-compliance by head contractors with modern slavery requirements may result in progressive remedial action.

Supplier Due Diligence

Ecove Group assesses and manages modern slavery risks across its supply chains through the following approach:

- **Risk Assessment:** High-risk suppliers are identified based on industry sector, geographic location, workforce composition, and supply chain complexity
- **Supplier Engagement:** High-risk suppliers are required to complete modern slavery self-assessment questionnaires and provide evidence of compliance with employment laws
- **Verification:** Project managers conduct regular site inspections to verify working conditions, employment records, and worker compliance. Third-party audits are engaged where appropriate
- **Corrective Action:** Where gaps or risks are identified, suppliers are required to develop and implement Corrective Action Plans. Non-compliance may result in contract termination
- **Capability Building:** Ecove Group provides training and resources to help suppliers strengthen their modern slavery risk management

Training and Awareness

Ecove Group ensures all employees receive training on modern slavery awareness, including the definition and forms of modern slavery, modern slavery risks in the property and construction sector, and how to recognise warning signs. Procurement and project management teams receive additional specialised training on conducting supplier assessments and site monitoring. On-site workers and suppliers are also provided with information on modern slavery, labour rights, and grievance mechanisms.

Grievance Mechanisms and Remediation

Ecove Group provides confidential mechanisms for workers, suppliers, and other stakeholders to report modern slavery concerns, including a whistleblower hotline, direct reporting to

management, on-site reporting, and external channels such as the Fair Work Ombudsman. All reports are treated as high priority and subject to prompt investigation. Where modern slavery is confirmed, Ecove Group is committed to providing appropriate remedy, including payment of unpaid wages, connection to support services, and contract termination where breaches are serious.

Ecove Group maintains a strict non-retaliation policy. Workers, contractors and suppliers who report modern slavery concerns will not face dismissal, contract termination, wage deduction, visa cancellation threats or intimidation. Any retaliation will result in immediate investigation, contract suspension/termination and referral to the relevant authority.

5. ASSESSING EFFECTIVENESS

Ecove Group is committed to assessing the effectiveness of its modern slavery risk management actions and continuously improving its approach.

Effectiveness Measures

Ecove Group monitors the following performance indicators:

- Percentage of high-risk suppliers completing modern slavery self-assessments
- Number of supplier interviews and engagement sessions conducted
- Percentage of new high-risk suppliers assessed prior to contract award
- Number of Corrective Action Plans issued and completed
- Employee training completion rates
- Number of suppliers participating in training programs
- Number of grievances or concerns reported and average response time
- Number of confirmed modern slavery cases identified

Continuous Improvement

Ecove Group recognises that addressing modern slavery is an ongoing process. The company will regularly:

- review the effectiveness of its policies, procedures and due diligence processes;
- identify emerging risks and adapt risk assessment approaches;
- enhance supply chain visibility and traceability;
- strengthen engagement with workers on construction sites;
- build supplier capability through training and resources; and
- develop remediation procedures that ensure victim-centred responses.

6. CONSULTATION WITH CONTROLLED ENTITIES

This Voluntary Modern Slavery Statement has been prepared on behalf of Ecove Group Pty Limited and its controlled entities. All controlled entities were consulted in the preparation of this statement, provided input on operations and supply chains, and endorsed the statement's content and commitments. Each controlled entity operates under the same governance framework, policies, and due diligence processes outlined in this statement.

7. OTHER RELEVANT INFORMATION

Commitment to Transparency and Continuous Improvement

Ecove Group is committed to transparency, accountability, appropriate remedy for victims of modern slavery, continuous improvement of its approach, and collaboration with stakeholders to address modern slavery.

Stakeholder Engagement

Ecove Group's modern slavery governance approach is aligned with the NSW Anti-Slavery Commissioner's Guidance on Reasonable Steps, which informs the company's risk assessment methodology, supplier engagement and remedy procedures.

Ecove Group welcomes feedback and engagement from stakeholders on its approach to modern slavery risk management.

Contact Details:

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MANDATORY CRITERIA CROSS-REFERENCE

This statement addresses the seven mandatory reporting criteria under section 16 of the Modern Slavery Act 2018 (Cth):

Criterion	Section
1. Identify the reporting entity	Section 1

2. Structure, operations, and supply chains	Section 2
3. Risks of modern slavery practices	Section 3
4. Actions to assess and address risks	Section 4
5. Assessing the effectiveness of actions	Section 5
6. Consultation with controlled entities	Section 6
7. Other relevant information	Section 7

SUPPORTING POLICIES

The following policies support Ecove Group's modern slavery risk management:

- Modern Slavery Policy
- Supplier Code of Conduct
- Procurement Standards
- Whistleblower and Grievance Policy
- Employee Code of Conduct
- Subcontracting Policy
- Workplace Health and Safety Policy

Policies are available upon request to Ecove Group.

PRINCIPAL GOVERNING BODY APPROVAL AND SIGNATURE OF RESPONSIBLE MEMBER

This Voluntary Modern Slavery Statement was approved and signed by Bassam Aflak as the Sole Director and principal governing body of Ecove Group Pty Limited, as defined by the Modern Slavery Act 2018 (Cth) on 5 January 2026.

Statement Date: 5 January 2026

Effective Date: 5 January 2026

Next Review: January 2027

Signed: 

Bassam Aflak
Sole Director
Ecove Group Pty Limited