

MODERN SLAVERY STATEMENT

SEPTEMBER 2023

deluca



BSA 62822 / ABN 80 055 193 514 / ACN 055 193 514

This statement is made pursuant to Modern Slavery Act 2018 (Cth) for the Financial Year 2022/23

We Serve to Influence and INSPIRE

About Deluca

Deluca was first established in 1994 as De Luca Properties by our Managing Director and Owner, Nic De Luca.

With a rich 29-year history built with a clear purpose "to serve to influence and INSPIRE", Deluca Corporation develop, design and construct large format retail projects, bulky goods, commercial, industrial, residential and childcare.

Deluca actively look for opportunities in these sectors whilst creating value for our clients and the community.



deluca

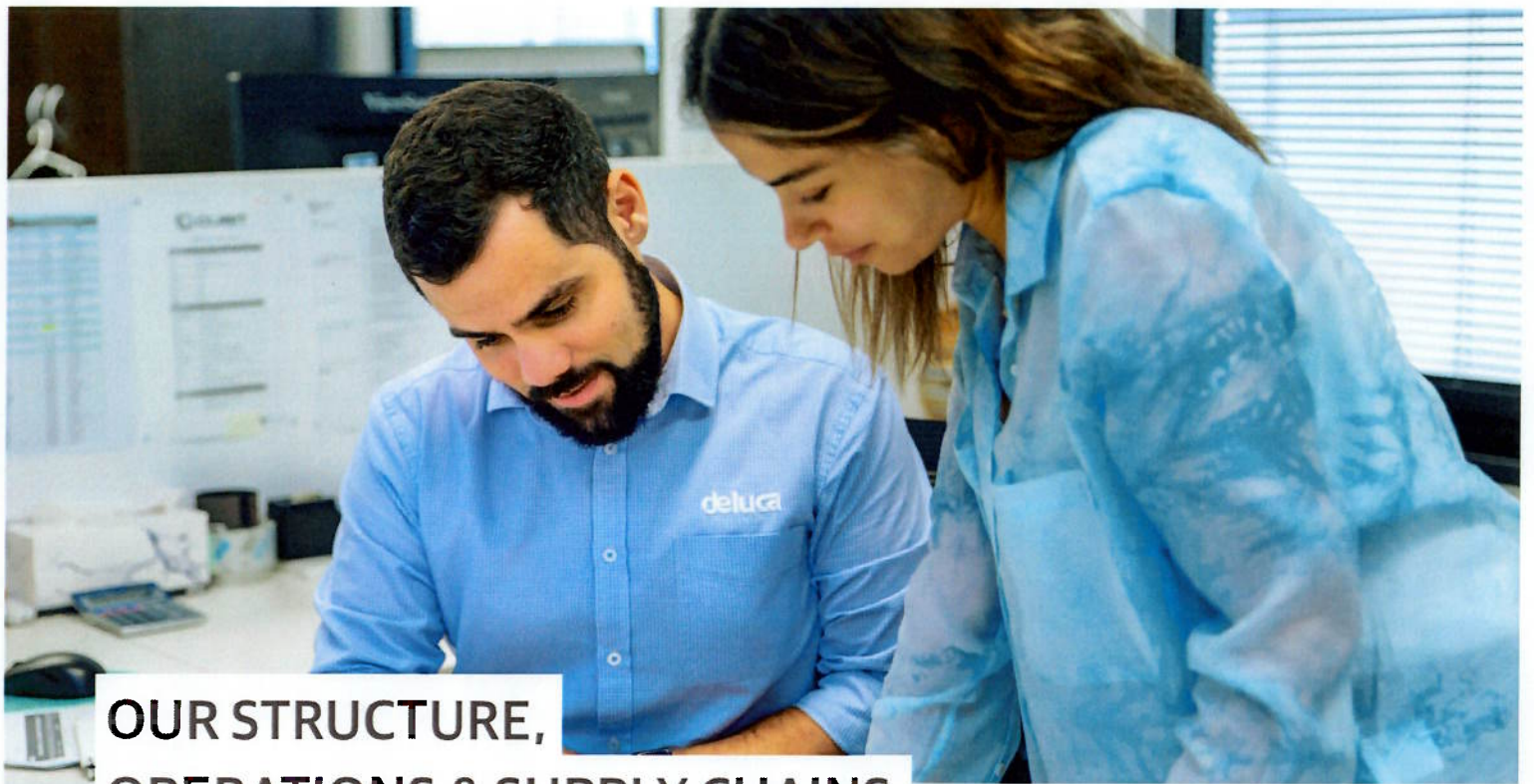


FOREWORD

This statement has received endorsement of Nic De Luca, Managing Director and principal governing body of Deluca Corporation Pty Ltd and pertains to the operations of Deluca Corporation Pty Ltd as well as the supply chains associated with our subcontractors.

The intent of this statement is to elucidate our strategy for establishing a resilient framework within Deluca Corporation Pty Ltd, which is designed to mitigate the risks associated with modern slavery across our business operations and supply chains.





OUR STRUCTURE, OPERATIONS & SUPPLY CHAINS

We create outstanding value and lasting worth within places that people are proud to live and work. We are structured as a single operational entity with the following operational lines:

- » Corporate
- » Construction
- » Development
- » HSEQ & Compliance
- » Marketing
- » Design
- » Estimating & Commercial
- » Asset Management
- » Support Services



Primarily operate in QLD



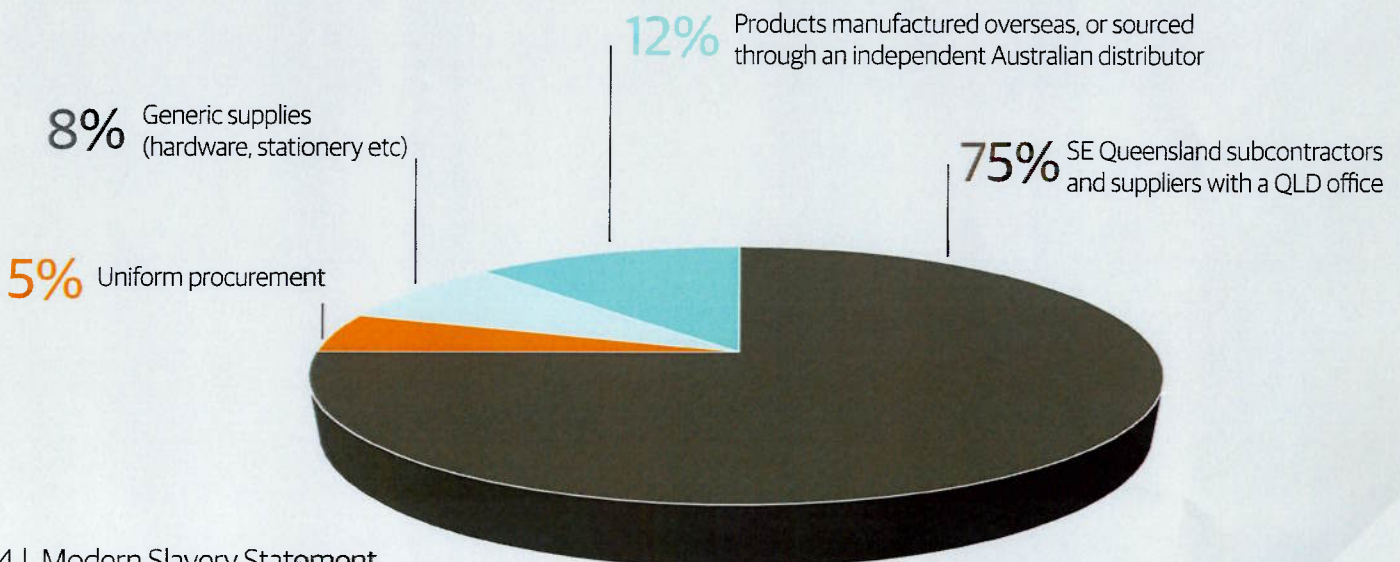
Over 64 employees that **make it happen**



An annual turnover in excess of \$165 million

SUBCONTRACTORS

Deluca doesn't directly employ its own installers, these are subcontracted out. Our subcontractors that are engaged for our projects are mostly small to medium businesses with personnel ranging from 5 to 30 employees. Our material and supply chain can be segmented as:





THE RISKS OF MODERN SLAVERY PRACTICES

Deluca operates a preferred subcontractor/supplier list. To ensure all those in our preferred list comply with our values, we conduct a due diligence overview on all subcontractors and suppliers before allowing them to become one of our preferred.

One of our approaches is to cease the operational use of a supplier and subcontractor should we object to their treatment of workers. In practice the choices aren't limited, the culture within Australia's construction industry is one where high individual responsibility is being valued.

We see already that many of our key subcontractors and suppliers have published their own, policies. While the policies focus on construction, most policies include a statement on employee conditions. Fair working conditions are cultivated in such economic environments and the risks of modern slavery fade. For these reasons, we believe that the risks of modern slavery practices in our key supply chains are low.

Finally, there is a potential risk with the direct subcontracting of works in less developed businesses where their understanding of modern slavery is unknown.

These activities could potentially be at risk of the modern slavery within Deluca, this list will be reviewed and updated periodically:

>> Use of staff by subcontractors or suppliers to Deluca, where the suppliers' processes are not compliant;

>> Employment of sub-consultants, suppliers & sub-contractors by De Luca Corporation, where their work practices may be non-compliant.



ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

Deluca has approached the task of minimising the risks of modern slavery according to the level of supply:

<p>Minor</p> <p>Suppliers Products manufactured overseas or sourced through an independent Australian distributor</p>	<p>19.5% of our supply chain</p>	<ul style="list-style-type: none"> >> Reviewed company policies and statements of our minor suppliers (e.g. Modern Slavery) >> Understanding that these suppliers as to the existence of Modern Slavery. >> Factory Inspections: As part of our ethical purchasing drive, our management may inspect factories to meet with manufacturers.
<p>Moderate</p> <p>Australian Wholesalers Generic supplies (hardware, stationery etc)</p>	<p>39.5% of our supply chain</p>	<ul style="list-style-type: none"> >> Reviewed existing company policies and statements of originating manufacturers where they exist (e.g. Modern Slavery and CSR Report) >> Educated suppliers as to the existence of the Modern Slavery Act.
<p>Major</p> <p>SE QLD subcontractors & suppliers (all with a Queensland Office)</p>	<p>41% of our supply chain</p>	<ul style="list-style-type: none"> >> Reviewed existing company policies and statements (e.g. Modern Slavery and CSR Report) >> Buy from larger companies with turnover of more than \$100m so that by 2022-2023 they will have made a Modern Slavery Statement (e.g. Office-works, Bunnings etc)

ADDITIONAL STEPS

Our Pre-Subcontract Assessment Checklist and Policies forms an integral part of our contracts for subcontractors/suppliers which confirm that no part of their business operations contradicts these policies and procedures.

We are committed as an organisation to tackling modern slavery and human trafficking and want to work with suppliers and subcontractors who share our values to meet our Deluca Way.

We operate with a number of internal policies and procedures to ensure that we are conducting business ethically and transparently, these include:



>> Modern Slavery Policy Statement:

At Deluca Corporation Pty Ltd, we are committed to upholding human rights and ethical business practices throughout our operations. We recognise that modern slavery and human trafficking are grave violations of human dignity and fundamental freedoms. This Modern Slavery Statement outlines our approach to preventing and addressing modern slavery within our organisation and supply chains.

>> Corporate Social Responsibility Policy:

Deluca believes that its Corporate Social Responsibility Policy will provide long-term benefits to its employees, customers, and individuals in all communities by applying effective systems and processes.

>> Industrial Relations Policy:

Deluca tracks Workplace Relations Management and identifies industrial relations issues relevant to commercial construction and prescribe specific actions for occurrences of grievance disputes, site issues or any other unforeseen action that may impact Deluca by respecting and upholding principles concerning freedom of association and oppose coercion by sustaining employment practices that are fair and just.

>> Code of Conduct the Deluca Way.

This code sets Deluca's expectations of ethical behaviour incorporates our purpose and the core values and behaviours of 'The Deluca Way', summarised in one word - INSPIRE. This is how, we behave as an organisation and how we expect our employees, suppliers and subcontractors to act.

To ensure a high level of understanding senior management have been educated on the risks of Modern Slavery. This has already and will be continued to be expanded to all staff, in the 2022/23 period.

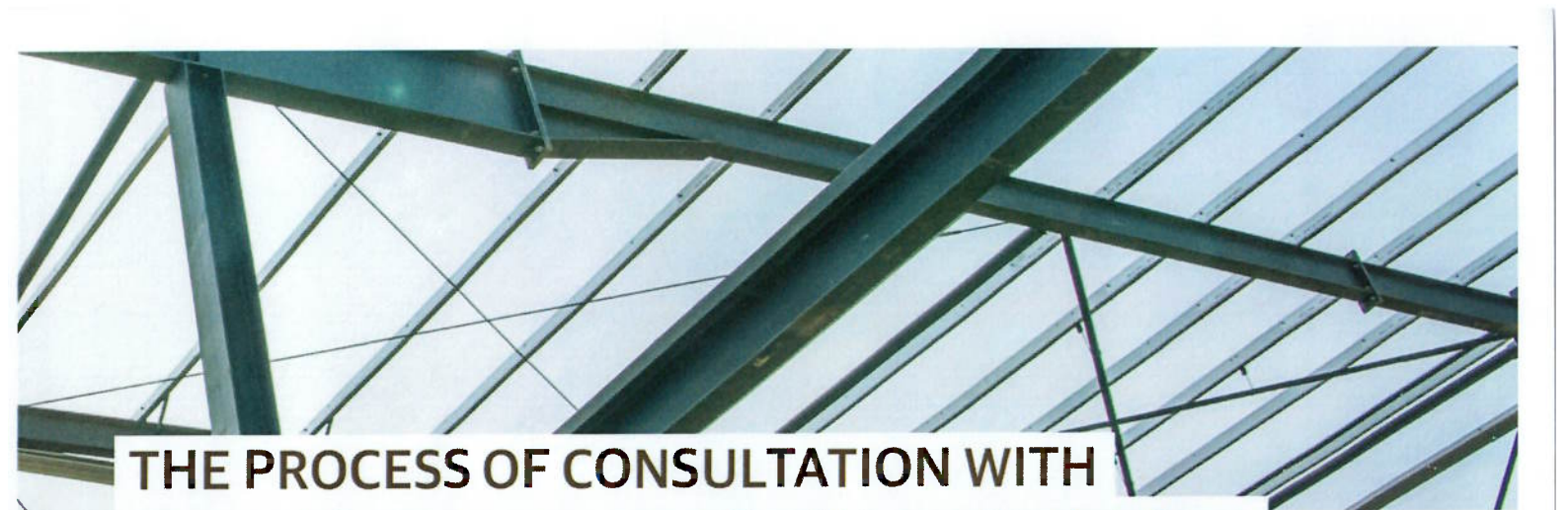


ASSESSING EFFECTIVENESS

To date, we have found no incidents of modern slavery in our supply chain, and have not been required to act. At this early stage, there is a range of ways in which Deluca will demonstrate the effectiveness of our actions, including:

1. The senior leadership team will annually review and report Deluca's response to modern slavery.
2. Track actions that have been implemented, the number of high-risk suppliers engaged, and levels of awareness among staff. This to be included in the annual review.
3. Prequalification checks "Pre-Subcontract Assessment Checklist" for suppliers to be expanded to include a Modern Slavery Assessment. This process is to be audited annually and to include a determination if mitigation measures have been consistently actioned.
4. Factory Visit: A factory visit included observations around supply and Modern Slavery. Pre-trip briefings will include a section on Modern Slavery: what to look for and what to ask.
5. Annually review with major suppliers, how they are progressing any actions they have put in place to address modern slavery risks.





THE PROCESS OF CONSULTATION WITH ENTITIES THAT DELUCA OWNS OR CONTROLS

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chains if:

No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

GOALS 2022/23

- >> Continued support and training for all staff on Modern Slavery, what their company is doing and their role.
- >> Integrate Modern Slavery into project and subcontractor site training to promote awareness.
- >> Encourage subcontractors and suppliers to make their own Modern Slavery commitment.
- >> Look for continual improvement opportunities.

MODERN SLAVERY POLICY STATEMENT

The following articulates the vision of Deluca Corporation Pty Ltd, wherein a diverse workforce comprising employees and contractors thrives. Our unequivocal stance against modern slavery drives our dedication to upholding the integrity of our business and supply chains, ensuring they remain untainted by exploitative practices.

Our Commitment: We have implemented comprehensive policies and protocols aimed at preventing instances of modern slavery and human trafficking within our operations. These measures encompass:

- **Code of Conduct:** We have a comprehensive Code of Conduct that sets out our expectations for ethical behaviour, respect for human rights, and compliance with relevant laws and regulations.
- **Supplier Code of Conduct:** We require all our suppliers and contractors to we expect all our suppliers and contractors to share our commitment to ethical business practices and respect for human rights.
- **Due Diligence:** We conduct due diligence on our supply chains to identify and assess the risk of modern slavery. This includes evaluating our suppliers' policies, practices, and procedures related to human rights and labour standards.
- **Risk Assessment:** We regularly assess the risk of modern slavery in our operations and supply chains. This enables us to identify high-risk areas and take appropriate actions to mitigate those risks.
- **Employee Training:** We provide training to our employees to raise awareness about modern slavery and human trafficking, enabling them to identify and report any concerns.
- **Monitoring and Compliance:** We are committed to monitoring and improving our efforts to combat modern slavery. We will conduct regular audits and assessments of our suppliers' compliance with our policies. We will take appropriate actions if any instances of modern slavery or non-compliance are identified.
- **Review and Reporting:** This Modern Slavery Statement will be reviewed annually to ensure its effectiveness and relevance. We will prepare and publish an annual report, summarising our actions and progress in combating modern slavery.

In alignment with our unwavering commitment, Deluca Corporation Pty Ltd is resolute in its mission to proactively combat modern slavery and human trafficking within our organisational framework and throughout our supply chains. Our steadfast adherence to elevated ethical benchmarks and the safeguarding of human rights remain paramount. This Modern Slavery Statement not only mirrors our continuous endeavours but also serves as a testament to our unwavering dedication to fostering a world rid of modern slavery.

Approved by:

Nic De Luca
Managing Director

Date: 12/09/2023