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# Our commitment

The Deicorp Group of companies recognises the importance of adhering to the highest standards of ethical behaviours and encouraging a mindset of continual improvement in everything we do.

The organisation is committed to upholding the values of Integrity, Fairness and Respect and this commitment extends to our business relationships and agreements with partners, suppliers and contractors. These values, and their application in all of Deicorp Group's relationships underpin our commitment to effectively respond to the risks of Modern Slavery across the organisation's supply chain and business arrangements.

Deicorp's Modern Slavery Statement is based on our zerotolerance approach to any form of slavery-like practices and documents our commitment to and strategies for avoiding slavery in any form in our business.



**40 Suburbs** Of developments in the Sydney region





Australian Owned and operated Developer - Builder



#### Seamless Journey

From sales to post-settlement and customer care



Award-winning team

property developer



**\$3.5 Billion** Invested in construction

#### **Overview**

Deicorp Group is a privately owned property development and construction business.

This Modern Slavery Statement (**Statement**) has been prepared on behalf of and in relation to the activities of Deiri Nominees Pty Ltd (ACN 121 744 456) (**Deiri Nominees**) and its wholly-owned subsidiaries, including Deicorp Pty Ltd (ACN 138 180 337) (**Deicorp**) and Deicorp Property Group Pty Ltd (ACN 169 423 250) (**DPG**) and the whollyowned subsidiaries of DPG (collectively, **Deicorp Group**) pursuant to sections 14 and 16 of the *Modern Slavery Act 2018* (Cth) (**Act**).

This Statement sets out the steps taken by Deicorp Group to assess and address risks of modern slavery within the organisation and its supply chain during the reporting period of 1 July 2019 to 30 June 2020 (**Reporting Period**).

### Deicorp Group's structure and operations

Since its inception in 1999, Deicorp Group has become one of Sydney's premier construction and property development companies. Deicorp Group comprises multiple related entities, all of which are privately owned, incorporated in Australia and headquartered in Redfern, Sydney. In its 20 years of operation, Deicorp has successfully delivered projects in over 40 suburbs across Greater Sydney and has grown to over 200 team members, comprising executive staff, project managers, design practitioners, construction workers, sales representatives and accounting and legal staff.

Through its development arm, headed by DPG, Deicorp Group acquires and develops prime sites across Sydney. Deicorp Group's construction arm, headed by Deicorp (a licensed builder), is engaged by both Deicorp Group's development entities and external clients to construct large, mixed-use developments. As head contractor on projects on which it is engaged, Deicorp is responsible for subcontracting specialty work, retaining expert consultants and engaging with suppliers to deliver its projects.

Deicorp Group's sales team is responsible for marketing and selling Deicorp Group apartments and liaising with Deicorp Group's external agents and customers.

Deicorp Group also prides itself on giving back to the communities in which it operates, partnering with a number of key community organisations and charities through its charitable entity, Deicorp Community.



Every Step Of The Way'



#### Supply chain

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Area	Supply chain
DPG (development arm)	<ul> <li>Service providers, including architects, engineers, accountants, lawyers and town planning consultants</li> <li>Financiers</li> </ul>
Deicorp (construction arm)	<ul> <li>Consultants, including engineers and architects</li> <li>Subcontractors across the full range of construction activities, including excavation and demolition, formwork, hydraulic, mechanical, electrical, civil and landscaping</li> <li>Suppliers of materials, plant and equipment (including manufacture and transport)</li> <li>Labour hire providers</li> <li>Uniforms and work attire</li> </ul>
Deicorp Properties and Deicorp Community	<ul> <li>Property agents</li> <li>Promotional merchandise</li> <li>Hospitality and catering</li> </ul>
Deicorp Group (head office)	<ul> <li>Office consumables</li> <li>Technology and IT support</li> <li>Hospitality and catering services</li> <li>Cleaning</li> </ul>

Aside from certain foreign suppliers and manufacturers, all entities in Deicorp Group's supply chain are based in Australia.

#### **Deicorp Group's approach**

Deicorp Group has zero tolerance for any form of slavery-like practices.

Deicorp Group has established a modern slavery working group to build on existing policies and procedures and develop and implement processes to identify and address the risks of modern slavery in its operations and supply chain. This working group consults with all areas of Deicorp Group's business, including legal, finance and procurement and reports directly to Deicorp Group's board. This consultation process was followed in the preparation of this Statement.

## Potential risks in Deicorp Group's supply chain

Deicorp Group already has in place policies and procedures designed to promote ethical business practices and conduct among its employees, both in their dealings with each other and with external providers.

Embedding and instilling Deicorp Group's approach to slavery-like practices within the organisation starts with its recruitment. A key aspect of Deicorp Group's employee recruitment includes ensuring that employees share the same values as the Deicorp Group. That includes respect for and fair treatment of all colleagues, suppliers, subcontractors and consultants.

Deicorp Group's employees are employed directly on permanent contracts or pursuant to an enterprise agreement. This lowers the risks of slavery-like practices within Deicorp Group's direct team.

Similarly, the ethical business practices instilled in Deicorp Group's employees through Deicorp Group's policies, briefings and training assist in minimising the risk of slavery-like practices in entities with whom Deicorp Group deals directly.

Deicorp Group's assessment of risk therefore focused on third-party contractors and suppliers.

Deicorp Group works closely with its trading partners during both the contracting and delivery phases of their engagement in order to ensure an alignment of values. All of Deicorp Group's locally-based suppliers, subcontractors and consultants are contractually required to comply with all applicable legislation and regulations relating to working hours, wages, welfare and human rights. Deicorp prides itself on paying all subcontractors, consultants and suppliers as quickly as possible, which it believes in turn minimises the risk of downstream exploitation of workers.

Deicorp Group also believes in supporting its trading partners through training and knowledge-sharing, holding regular forums to communicate clear expectations.

Deicorp Group has therefore assessed its local supply chain partners as being at low risk of slavery-like practices.

In assessing potential risks in its broader supply chain, Deicorp Group has had regard to available reference material reporting on the global incidences and prevalence of slavery-like practices. Having regard to the nature of its operations, Deicorp Group deemed the risk of forced labour more relevant to its operations than forms of slavery-like practices involving forced marriage. The available material suggests that forced labour is most prevalent in Asia and the Pacific, followed by Europe and Central Asia and that the construction and manufacturing are the sectors with the second and third highest prevalence of forced labour, respectively.

Based on this geographical and industry-based approach to assessment of risk in the supply chain, Deicorp Group assessed those areas of the supply chain where products and raw materials are sourced in Asia (it being identified as the main overseas source location for materials and products in Deicorp's supply chain) as presenting a medium to high risk of slavery-like practices.

#### Addressing the risk of modern slavery practices

Deicorp Group's key actions during the course of FY2020 are outlined below



#### Looking forward

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Over the next Reporting Period, Deicorp Group's key focus areas will be:

- continued due diligence (through supplier and subcontractor questionnaires);
- ongoing engagement with suppliers and service providers to assess and address risks;
- developing a more detailed supply chain map;
- refinement of Modern Slavery policies based on assessed risk;
- training and awareness, for both suppliers and subcontractors and Deicorp Group staff;
- remediation and mitigation of risk through refinement of procurement practices and reduced reliance on overseas suppliers (who are typically more difficult to oversee) where possible; and
- amending supply contracts and subcontractor agreements.

Deicorp Group will continue to monitor the effectiveness of its modern slavery program by developing a matrix of key performance indicators and recording progress against those figures.

#### Approval

This Statement has been approved by the governing body of Deiri Nominees both on its own behalf and on behalf of each reporting entity covered by the Statement, pursuant to sections 14(2)(d)(ii) and 16(2)(b) of the Act.

Fouad Deiri Managing Director



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