

**JOINT MODERN SLAVERY  
STATEMENT**

FINANCIAL YEAR ENDING 30 JUNE 2020

**Decode Corp Pty Ltd (ACN 629 285 534) &  
Decode Group Pty Limited (ACN 611 188 339)**

**Level 8, 52 Alfred St, Milsons Point NSW 2061**



**WHO WE ARE**

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## WHO WE ARE

This joint modern slavery statement for the year ending 30 June 2020 has been prepared by Decode Corp Pty Ltd (ACN 629 285 534) (**DC**) and Decode Group Pty Limited (ACN 611 188 339) (**DG**), both of which are Australian proprietary companies. The registered office address for both DC and DG is Level 8, 52 Alfred Street, Milsons Point NSW 2061.

DC and DG are associated entities forming a corporate group operating a construction and property development business trading as 'Decode'.

The sole director of both DC and DG is Hussein El Rihani.

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## OUR OPERATIONS

Our business is focused on projects located in the Sydney metropolitan area. Between them, DC and DG own or control about 8 other Australian entities which also form part of the Decode corporate group.

In total, the Decode corporate group employs approximately 100 employees, all of whom are based in Australia.

For our construction work, we also engage a number of sub-contractors. In 2019/2020, the total number of suppliers and sub-contractors engaged were approximately 800.

We source products used in our construction projects from a variety of suppliers. These products include reinforcing steel, concrete, windows, plumbing, tiles, appliances and flooring. Except with respect to signage which is sourced directly from China, all other suppliers are based in Australia.

While we have longstanding relationships with many of our suppliers, we generally seek quotes from them on a project-by-project, or even task-by-task basis.



**OUR SUPPLY CHAINS**

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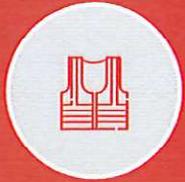
## OUR SUPPLY CHAINS

Our main supply chains relate to products used in construction work. While our suppliers are predominantly based in Australia, we are aware that they, in turn, source product and raw materials from overseas.

The main country of origin for most of the product used in our construction work is China, including but not limited to flooring, appliances, plumbing, tiles, windows and joinery. Reinforcing steel is predominantly sourced from Turkey, India and China.

**MODERN SLAVERY RISKS**





## MODERN SLAVERY RISKS

We do not consider that our operations directly cause a risk of modern slavery. We do appreciate, however, that risks of modern slavery may be present in our supply chains as a result of the geographic locations of where a large amount of the products and raw materials we utilise are sourced. In particular, we acknowledge that there is a higher prevalence of modern slavery in China compared to Australia.

At present, we lack sufficient insight into the actual practices of second tier suppliers (i.e. suppliers to our direct Australian-based suppliers).

The requirement to submit a modern slavery statement has given us an opportunity to reflect more on the possible impact of modern slavery on our operations. We are seeking to be more proactive in the future in terms of identifying more specifically the risks of modern slavery to our supply chain and taking appropriate steps to remediate.

The steps that we will be taking to address the risks of modern slavery are set out below.

**OUR APPROACH  
TO MODERN SLAVERY**





## OUR APPROACH TO MODERN SLAVERY

Modern slavery in all forms is antithetical to our mission and objectives. We will not knowingly engage with any parties who are tolerant of modern slavery practices. We welcome the opportunity to take more proactive steps in this regard.

In terms of our direct operations, we consider that a number of our current practices assist in reducing the risk of modern slavery developing or occurring. For instance, we have a dedicated human resources function, the responsibility of which is to seek compliance with applicable regulatory requirements, including meeting of minimum terms and conditions of employment.



## OUR APPROACH TO MODERN SLAVERY

Further, we have a comprehensive Employee Handbook which outlines our employment policies and procedures. These policies and procedures set standards of behaviour that all staff are expected to meet (including an Equity, Inclusion, Respect & Dignity and Bullying & Harassment policies) and also allow mechanisms for staff to note concerns or lodge grievances.

We are also committed to ensuring that our sub-contractors adhere to appropriate standards and regulations. Action in this respect includes requiring sub-contractors to submit a completed statutory declaration each time they make a claim for payment in which they are required to confirm that all employees, secondary subcontractors and suppliers have been paid all moneys due and payable in respect of their engagement for work pursuant to the relevant subcontract.



**REVIEWING OUR  
SYSTEMS**

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## REVIEWING OUR SYSTEMS

We are committed to effectively assessing and addressing modern slavery risks in our operations and supply chains.

The main area of focus in the immediate future will be on reviewing and assessing the prevalence of modern slavery on our supply chains and developing clear guidelines for how we deal with the risk of modern slavery. Actions that we anticipate taking include:

- engaging in a due diligence process with closer examination of our supply chains, seeking to increase our knowledge and understanding of the possible prevalence of modern slavery in our supply chain;
- reviewing and amending supplier agreements to include terms relating to modern slavery;
- implementing a modern slavery policy and supplier code of conduct; and
- developing modern slavery training for staff to increase awareness of the issue.



**CONSULTATION**

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## **CONSULTATION**

Entities within the Decode corporate group generally have common shareholdings and directors, meaning that there is already a large degree of central oversight of the operations of the separate entities. Accordingly, we consider that we have sufficient insight to make this statement relating to the operations of the Decode corporate group as a whole.



**APPROVAL**

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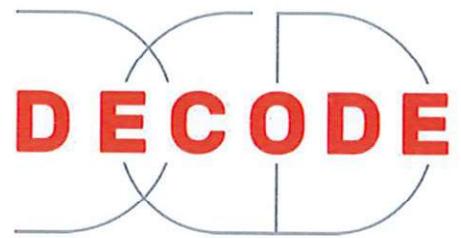
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## **A P P R O V A L**

This statement was approved by Hussein El Rihani, in his role as sole director of Decode Corp Pty Ltd (ACN 629 285 534) and Decode Group Pty Ltd (ACN 611 188 339), on 31 March 2021.

A handwritten signature in black ink, appearing to be 'H. El Rihani', written over a horizontal line.

Hussein El Rihani  
Director of  
Decode Corp Pty Ltd  
Decode Group Pty Ltd



[www.decodegroup.com.au](http://www.decodegroup.com.au)