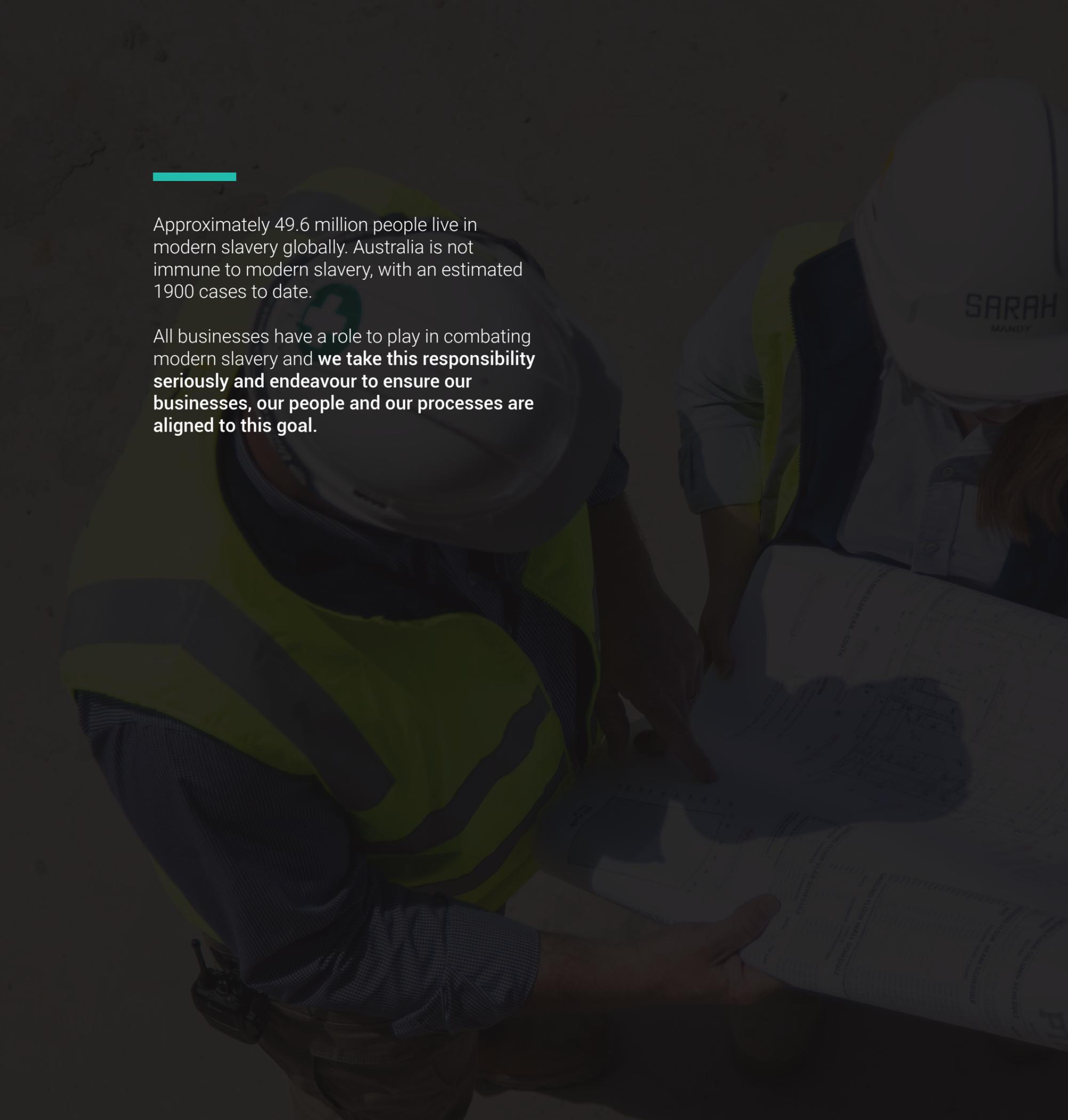


**sarah  
group.**

# **Modern Slavery Statement**

**2025**



Approximately 49.6 million people live in modern slavery globally. Australia is not immune to modern slavery, with an estimated 1900 cases to date.

All businesses have a role to play in combating modern slavery and **we take this responsibility seriously and endeavour to ensure our businesses, our people and our processes are aligned to this goal.**

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# 01.

## About us

This Modern Slavery Statement is made by Doneilyn Pty Ltd ABN 69 007 544 836 for the reporting period ended 30 June 2025 (FY25) pursuant to the Modern Slavery Act 2018 (Cth) ("Modern Slavery Act"). Doneilyn is a privately held company and the parent entity of Sarah Constructions Pty Ltd, Sarah Build Pty Ltd, Sarah Defence Pty Ltd, Hindmarsh Plumbing Services Pty Ltd, Hindmarsh Plumbing Services (WA) Pty Ltd and Longridge Group Pty Ltd, providing commercial and residential construction and commercial plumbing services across Australian States and Territories.

This statement is submitted on behalf of all the above entities and when we refer to "Sarah", "we", "us" or "our" in this statement, it is a reference to all the above entities.

Our registered office and principal place of business is:  
49 Glen Osmond Rd  
Eastwood, SA 5063



## Our Operations

During FY25 Sarah employed 420 personnel across head office and project sites delivering work for private and government clients, across multiple sectors and predominantly in South Australia. In FY25, we also expanded operations into Western Australia through Hindmarsh Plumbing.

## 01 | About us

### Our Structure

Sarah is an Australian based, privately-owned company delivering commercial and residential design and construction services, as well as commercial plumbing services.



Design



Construction  
Project Delivery



Plumbing  
Service Delivery  
and Maintenance



Plumbing  
Hydraulic and  
Mechanical  
Services



Water Treatment



Corporate  
Services  
(including  
Finance, HR, IT,  
Insurance  
and Property)



Commercial  
Property  
Portfolio



Developments



Residential  
Construction

## Our Values

**Sarah is a proud, South Australian business - a diversified construction and property group, leading a collective of trusted companies with strong expertise across the industry.**

With over 60 years of expertise, our purpose is to build thriving, sustainable communities. We create distinctive value and deliver exceptional experiences.



### Collaborative Partner

Trust. Transparency. Teamwork.



### Empowered People

Great people, greater impact.



### Visionary Leadership

Bold ideas, innovative outcomes.



### Family Focus

Grounded in integrity, inspired by legacy.

Sarah Constructions

Hindmarsh Plumbing

## Our Projects

Key projects undertaken during the FY25 include:



### Tonsley Technical College + Factory of the Future

This project is South Australia's first mass timber (CLT and GLT) education building, delivered for Flinders University and the Department for Education. Spanning 6,000m<sup>2</sup> in gross floor area, it features recycled concrete, sustainable finishes, and high-performance services, achieving a 5 Star Green Star rating and WELL Core Silver certification.



### Port Augusta Technical College

Sarah delivered a landmark regional education facility setting a new benchmark for vocational education in South Australia. Completed on a tight program, it featured complex design elements—bespoke formwork, large curves, raked forms, curtain wall façade, and custom stormwater solutions—with specialist learning areas and student accommodation integrated with the existing school.



### Yitpi Yartapuultiku Cultural Centre

The Yitpi Yartapuultiku Cultural Centre is a landmark project shaped through deep engagement with the Kaurna community. Spanning 49,000m<sup>2</sup> along the Port River, it features a cultural centre, living shoreline, and gathering spaces, celebrating place and culture through a collaborative process balancing cultural, environmental, and community priorities.



### Noarlunga Hospital

Hindmarsh Plumbing was thrilled to continue its contribution to the expansion of the southern health network in Adelaide. The 48 bed expansion of Noarlunga Hospital was the biggest in its history, boosting the hospital's capacity by more than 65%. The brand-new facility significantly enhances the hospital experience, with patients being accepted for the first time in November 2025.



### SAPOL Barracks Relocation

Another key project for South Australia with the relocation of the Police barracks from Port Road to Gepps Cross. This project involved the delivery of a custom-built facility, providing a higher standard of accommodation and facilities for staff and animals. With plenty of time pressure, the Hindmarsh Plumbing team delivered strongly and the final result speaks for itself.



### SASI New Headquarters

A historic investment was made in the future of sports in South Australia with the construction of a state-of-the-art facility at Mile End. Hindmarsh Plumbing commenced on site after the early works were complete and performed superbly. The finished product is an asset that everyone can be proud of.

## Our Supply Chain

In FY25 Sarah's procurement spend was approximately \$493 million.

We extended on the prior year assessment of our supply chain during the current year, with the main categories of spend remaining largely the same and summarised below.

### Commercial Construction

Subcontracts and Labour	Materials	Materials and Labour	Equipment
Hydraulic and Plumbing Services	Steel	Doors and Frames	Rubbish Bins
Mechanical Services	Aluminium	Formwork	Site Sheds
Electrical Services	Concrete	Cladding and Roofing	Equipment Hire
Civil infrastructure	Reinforcement Supply	Ceilings and Partitions	Vehicle Fleet
Reinforcement Fix	Furniture	Carpet and Flooring	
Fire Protection Services	Timber	Joinery	
Landscaping Services		Concrete - supply and place	
Aquatic Services		Painting	
Tiling		Fencing	

### Residential Construction

Materials	Materials and Labour
Steel	Doors and Frames
Timber	Cladding and Roofing
Glass	Carpet and Flooring
Hebel	Joinery
Iron Cladding	Concrete - supply and place
Plasterboard	Painting

### Commercial Plumbing

Subcontracts and Labour	Materials	Equipment
Demolition	Plumbing Supplies	Vehicle Fleet
Fire Protection Services	Water Treatment Supplies	Excavation Equipment
Civil Infrastructure		
Water Treatment Specialists		
Apprentice Providers		

### Corporate Services

IT Software	Advisory Services including Professional Services
IT Equipment	Training
Telecommunications	Office Supplies
Insurance Broker and Insurance Services	Office Cleaning
Offshore Service Providers	

Our highest spend categories were subcontractors, labour, and materials. We only contract directly with local Australian companies and do not contract directly with overseas suppliers, unless the job design specifications require us to procure from overseas. Although all our direct suppliers are domiciled in Australia,

they often supply goods or services sourced from other regions. Our subcontractors mostly supply the construction materials used on our projects, which limits our visibility of the risks associated with these parts of the supply chain. Within our commercial plumbing operations 90% of our supplies are sourced from Reece and Tradelink.

### Supply Chain and Labour Constraints

*Like many in our industry, we have not been immune to supply chain constraints, supply cost escalation and access to labour. To manage this risk, we have focused on building strategic relationships with top subcontractors and suppliers, bolstered our employee offering to retain talent, reviewed of our new business function to ensure appropriate contingency is factored into pricing of work being tendered. As a result, we have managed to reduce loss making jobs, whilst retain solid relationships with our suppliers and subcontractors.*

### Use of Offshore Service Provider

During the reporting period, our organisation engaged an offshore service provider to support operational capacity. This decision reflects both practical workforce considerations and our strategic commitment to building capabilities in automation, AI and digital transformation.

We engaged offshore resources through an established and reputable offshoring company. Prior to engagement, we undertook appropriate due diligence to assess the provider's governance, labour practices, and alignment with our Modern Slavery principles.

We started with two resources and have grown to ten members of our external support team. To ensure ongoing alignment with our expectations and legislative obligations, we have scheduled a visit to the offshore service provider in FY26. The visit will assess working conditions, management practices, and worker wellbeing, and will help verify that the provider's operations remain consistent with our standards on human rights and modern slavery prevention.

We remain committed to maintaining oversight of our offshore arrangements and to continuously improving our processes for identifying and addressing modern slavery risks in all parts of our business and supply chain.

# 02.

## The risks of modern slavery in our operations and supply chain

The risk of modern slavery practices within our business was assessed on their potential to cause, contribute to or be directly linked to modern slavery through our operations and supply chains.

### In our Operations

In FY21, Sarah completed an initial review and gap analysis of the risk of modern slavery in our operations. This review was undertaken by leadership within our Operations, Finance, Procurement and Risk teams. This analysis has been reviewed and updated each financial year. There has not been significant changes in activity and our current risk of modern slavery within our operations remains LOW for the following reasons:

- ✓ We have an Audit and Risk committee which is chaired by an independent member. This committee oversees management of the Group risk register and delivery of an annual internal audit plan.
- ✓ We have a dedicated Human Resources team within each of our group entities. These teams have robust controls in place for onboarding new employees including but not limited to working right employment checks and preparing and reviewing employees' wages and salary agreements.
- ✓ The employee induction process includes the requirement for employees to confirm they have read and understood all our policies and minimum standards. All existing employees are required to re-confirm these every two years.
- ✓ We have ongoing training and engagement with our employees to ensure an understanding of modern slavery risks and responsibilities.
- ✓ All our employees are located in Australia.
- ✓ All apprentices are sourced through Australian Registered Industry Group Training Organisations, with 96% of apprentices sourced from either Master Plumbers Association South Australia (MPA) and Trainee & Apprentice Placement Services Inc (TAPS).
- ✓ Approximately 21% of our employees are covered by an enterprise agreement.
- ✓ We have implemented a subcontractor management database in our commercial construction entities (covering 90% of our procurement spend) which facilitate initial engagement with subcontractors, including a preliminary questionnaire relating to their modern slavery practices.
- ✓ In 2022, we engaged PwC to assess the maturity of our current approach to modern slavery against legislative requirements and best practice guidance. PwC noted that our maturity was at a 'managed' level, recognising our policies and procedures, understanding of suppliers and engagements with employees and suppliers.

## 02 | The risks of modern slavery in our supply chain

### In our Supply Chain

We understand by nature of the construction and plumbing industry we operate in, there are inherent factors which contribute to the risk of modern slavery. These factors are summarised below:

- Prevalence of outsourcing, which can impact upon operational and supply chain transparency.
- Contract terms with low margins and pressure on delivery times.
- Sub-contractors who may be reliant on a migrant workforce with limited local language competency and temporary visa arrangements.
- Multiple sub-contracting arrangements with informal agreements.
- Low barriers of entry for labour hire providers.
- Potential dangerous or poor working conditions, including:
  - > Workers are not paid fairly or withheld entitlements.
  - > Workers may be required to work excessive hours.
  - > Workplace safety concerns.
- Tight project deadlines and price pressures

Many of the suppliers and subcontractors we contract with, may source elements via overseas supply chains. We continue to build strong relationships with our supplier and subcontractor network to gain more insight and understanding of their supply chains, however it is difficult to have visibility across the multiple level and numerous components of modern slavery within our supply chain. This has been taken into consideration when performing our risk assessment and gap analysis.

The following key areas of modern slavery risk within our operations and supply chain have been identified:

	Project Supply Chains	Finance, HR, IT and Legal
 <b>High Risk</b>	Ceilings and Linings Cladding and Roofing Joinery Painting Tiling Concrete Labour Hire Aluminium	Offshore Service Providers
 <b>Medium Risk</b>	Steel Reinforcement Fix Hydraulic Services Mechanical Services Electrical Services	IT and Telecommunication Equipment Cleaning Services Office Supplies

# 03.

## Actions taken to assess and address the risks, including due diligence and remediation processes.

Sarah assessed the risk of modern slavery within our operations and supply chain by considering factors inherent to the construction industry as outlined in section 2 of this report as well as the following:

- Available evidence supporting the ability of our suppliers and subcontractors to manage the risk of modern slavery within their own supply chain
- The extent of elements supplied by our suppliers and subcontractors which are sourced from high-risk overseas regions
- The level of internal controls within Sarah which assist in reducing and managing the risk of modern slavery within our supply chain
- The relationships we have with our suppliers and subcontractors

### Actions already taken:

Following the initial risk assessment and gap analysis performed during FY21 and the subsequent reviews, the following actions have been undertaken:

- ✓ Embedding our updated procurement templates within our businesses processes.
- ✓ All purchase orders and subcontracts include terms with reference to Modern Slavery obligations and expectations.
- ✓ Implemented a subcontractor management database, which has purpose built modern slavery questionnaires and templates to further enhance our procurement processes and procedures.
- ✓ Engaged external consultants to review our processes and procedures in managing modern slavery risk, with the view of understanding gaps and opportunities for improvement.
- ✓ All suppliers, consultants and subcontractors undergo a prequalification process in which we assess commercial and contractual risks, including required licences and insurances, and confirm regulatory compliance, including compliance with modern slavery requirements.
- ✓ Refreshed internal policies to provide enhanced clarity on employee responsibility, as well as improved awareness of the process employees need to follow if there is an incident or suspected incident of modern slavery.
- ✓ Delivered Modern Slavery awareness training to our leaders through in person sessions and online training modules.
- ✓ 90% of Executives have completed in person modern slavery awareness training. In addition, senior leaders have completed a modern slavery online training module.
- ✓ Developed modern slavery posters to be displayed at all sites, including information about modern slavery and QR codes to access additional information and assistance in multiple languages. These posters are considered a standard part of site establishment and are checked at site establishment audits.
- ✓ Continued building strong relationships with our suppliers and subcontractors to gain better insight into the risks of modern slavery within their supply chain and to work as a driver for awareness and change within the industry.
- ✓ Reviewed Reece and Tradelink's Modern Slavery Statements to understand their approach to Modern Slavery. 90% of supplies in our commercial plumbing business are sourced from these two suppliers. Both suppliers have a taken action to manage modern slavery in their supply chain including risk assessing suppliers, supplier onboarding processes and supplier audits.

## 03 | Actions taken to assess and address risks, incl. due diligence and remediation

### Actions to be taken:

The following actions will be undertaken in the next financial year to continue to mature our approach to modern slavery:

Activity	
<input type="checkbox"/>	Continue to evolve our onboarding requirements and modern slavery questionnaires across the businesses
<input type="checkbox"/>	Engage with employee through ongoing communication and formal training to raise awareness of modern slavery risks
<input type="checkbox"/>	Undertake policy refresh as required
<input type="checkbox"/>	Engage in a comprehensive annual review of Modern Slavery practices and the Modern Slavery Statement with the Audit and Risk Committee
<input type="checkbox"/>	Visit Offshore Service Provider office to verify practices, policies and working conditions are in alignment with our Modern Slavery commitments.
<input type="checkbox"/>	Continue to analyse procurement spend and supply chain, with a focus on Longridge Group.

# 04.

## How we assess the effectiveness of our actions:

We continue to develop the way in which we assess the effectiveness of our actions in response to risks which cause, contribute, or are directly linked to modern slavery. Many of the actions which we have taken to date or are planning to take over the next 12 months are part of the development of our framework for the management of modern slavery risks.

As this framework matures and develops and as we gain a better understanding of our exposure to modern slavery risk, we will continue to improve and enhance our response accordingly.

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### Our assessment of actions undertaken will include:



Qualify subcontractors through our subcontractor management database



Include modern slavery questions as part of our standard subcontractor onboarding process



Review Whistle blower reports for any trends relevant to modern slavery



Evaluation of the effectiveness of training programs run across the business

# 05.

## How this statement was prepared:

This statement has been prepared in consultation with key stakeholders and executive management across all our entities.

This statement for the financial year ending 30 June 2025 is made pursuant to section 14 of the Modern Slavery Act 2018(Cth) and has been approved by the Managing Director of Doneilyn Pty Ltd.



Matthew Woodrow  
Group Managing Director

**sarah  
group.**

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