



Modern Slavery Statement

1 July 2024 to 30 June 2025

Sirrom Corporation Group Pty Ltd | ABN 50 154 271 780

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Acknowledgement of Country

Sirom acknowledges the Traditional Owners of Country throughout Australia and recognises the continuing connection to lands, waters and communities. We pay our respect to Aboriginal and Torres Strait Islander cultures; and to Elders past and present.



Content

This statement is made under the Australian Modern Slavery Act 2018 (Cth) (“the Act”).

It sets out the steps taken by Sirrom Corporation Group Pty Ltd (“Sirrom”) during the reporting period that commenced on 1 July 2024 and ended on 30 June 2025 to assess and address the risks of modern slavery in its operations and supply chains. We are committed to continuous improvement in our approach to identifying, assessing, and addressing modern slavery risks, including enhancing our due diligence processes, supplier engagement, and internal capability over time.

The table below presents the mandatory reporting criteria under Section 16(1) of the Modern Slavery Act 2018. Each requirement has been mapped to its corresponding section and page reference within this document.

Modern Slavery Act 2018 Criteria

Sec. 16 (1)	Legislative Requirement	Section/Page
(a)	Identify the reporting entity	Section 1 – p. 4
(b)	Describe the structure, operations and supply chains of the reporting entity	Section 2 – p. 5
(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entity that the reporting entity owns or controls	Section 3 – p. 6
(d)	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Section 4 – p. 7
(e)	Describe how the effectiveness of actions are assessed	Section 5 – p. 9
(f)	Describe the process of consultation with any entities that the reporting entity owns or controls	Section 1 – p. 4
(g)	Any other information that the reporting entity, or the entity giving the statement, considers relevant	N/A



Introduction

About This Report

We are pleased to present our inaugural Modern Slavery Statement and is made pursuant to Section 13 of the Act. This statement covers Sirrom Corporation Group of Companies ("Sirrom"). This statement outlines the approach we are taking to identify, assess, mitigate, and remedy modern slavery risks across our operations and supply chains. It also sets out the next steps we will undertake to strengthen our modern slavery due diligence practices as part of our commitment to continuous improvement during the reporting period from 1 July 2024 to 30 June 2025.

All dollar values in this statement refer to AUD.

Sirrom by the Numbers



720
team members



80
customers



7
Operating
entites



\$170 million
annual revenue



550
number of suppliers



1
country of
operation

Consultation Process

The consultation process between Sirrom and its subsidiaries is integrated within our existing governance structures, involving coordinated input from both internal and external stakeholders. Our parent company and subsidiaries share the same Directors and Board, which meets monthly to discuss the business of all entities. While the topic of modern slavery is still emerging for our business, going forward it has been incorporated into our established communication and governance framework. Oversight by a unified executive management group will ensure an ongoing consistent and coordinated approach to modern slavery across the entire group.

Principal Governing Body Approval

This modern slavery statement was approved by The Board of Directors in its capacity as the principle governing body in accordance with Section 13 of the Modern Slavery Act 2018 (Cth) on 30st October 2025

Signature of Responsible Member

This modern slavery statement is signed by Craig Madigan in his role as CEO in accordance with Section 13 of the Modern Slavery Act 2018 (Cth) on 30 October 2025.



About Us

We are a leading industry provider of high-quality remote hospitality services with over 50 years of experience.

Who Are We?

Sirrom is a 100% privately owned Australian company, operating as a single legal entity with centralised governance and operational oversight. The company employs approximately 720 staff across its Brisbane and Perth offices and regional project sites. -Sirrom has 10 subsidiaries and 7 operating entities.

Sirrom engages with a wide network of suppliers and subcontractors across Australia.

Sirrom currently operates across Queensland, Western Australia, the Northern Territory, and New South Wales, delivering integrated facilities management services to remote workforce communities in the mining, construction, and resource sectors.

What Do We Do?

Sirrom specialises in remote catering and hospitality services, including the provision of accommodation systems & front desk management, transport service, catering and tavern service, village housekeeping and janitorial service, mine site cleaning, commercial laundry service, retail management, transport services, security services, preventative and reactive village infrastructure maintenance services.

Our Supply Chain

Sirrom's supply chain is multi-tiered with three key components:

Direct Suppliers:

- Food and beverage suppliers for catering.
- Cleaning and laundry product suppliers.
- Construction and maintenance contractors for camp infrastructure.
- Transport and logistics providers.

Indirect Suppliers:

- Subcontractors for specialised services (e.g., security, waste management).
- Local businesses and landowner groups in remote regions.

Workforce Supply:

- Recruitment of local employees and subcontracted labour for remote sites.

During the reporting period, our supply chain consisted of 550 suppliers within Australia, with a total spend amounting to around \$62 million. The largest spend categories being food service, meat & poultry, fruit & vegetables, recruitment, logistics, travel and liquor. The majority of our supply arrangements (by value) are delivered under long term contracts. Ad hoc and short-term contracts are used for lower value service requirements.



Our Modern Slavery Risks

As this is our inaugural year of compliance with the Act, our risk assessment has primarily drawn upon desktop research, industry best practices, and an initial high-level review of our operations and supply chain.

Sirrom assessed modern slavery risk across approximately 550 suppliers, focusing on those with an annual spend over \$400,000. This threshold yielded 28 tier 1 suppliers, representing 83% of total spend. These were evaluated against four risk indicators: country, sector, products/services, and supply chain model. For the remaining 17% of suppliers, a high-level scan was conducted to identify suppliers in high-risk locations or industries for further evaluation in subsequent iterations.

We recognise the importance of deepening our due diligence efforts and are committed to strengthening our understanding of modern slavery risks. To that end, we will undertake a detailed supply chain mapping exercise and a comprehensive risk assessment in the next reporting period.

Our Risks of Modern Slavery Practices

Potential Risks in our Operations

Sirrom operates entirely within Australia and adheres to all relevant Australian labour laws and employment legislation. We have found no evidence of modern slavery practices within our operations and believe there is minimal risk of such practices occurring; however, we do have several controls in place to mitigate these risks which are discussed under 'Assessing & Addressing Modern Slavery Risks'.

Potential Risks in Our Supply Chains

Our tier 1 supply chain is based in Australia, where the risk of modern slavery is generally considered low. We also do not directly procure from any countries considered to be "at-risk", according to the Global Slavery Index (Walk Free Foundation). Despite this, we recognise the need to monitor potential risks within our supply chain that extend beyond tier 1 suppliers.

The following table provides an overview of identified potential modern slavery risks in our operations and supply chains, taking into account the geographical context, sector and industry specific practices, and products and services sourced and the supply chain model. While we acknowledge the *potential* for these risks to exist, with appropriate controls in place we consider them to be of a low-level and are not aware of any instances of modern slavery within our direct operations and tier 1 suppliers.

Risk	Description
Deceptive recruiting for labour or services The recruitment of a person for work or services through deception about the nature, conditions, or legality of the work, often resulting in exploitation.	Deceptive recruitment for labour or services can present both geographical and sector-specific risks within our supply chain. The risk is heightened in regions with less stringent labour laws and limited oversight, especially where intermediaries operate and there is reduced visibility of offshore recruitment practices. These factors combine to increase the vulnerability of workers and the likelihood of exploitation.
Forced Labour Work or service that a person is compelled to perform against their will under the threat of punishment or coercion.	Forced labour remains a risk in our supply chain, especially in sectors like meat and poultry, fresh produce, textiles, coffee, and outsourced logistics. These areas often involve vulnerable workers and complex, multi-tier supply chains, making it difficult to trace labour conditions fully. As a result, forced labour may occur upstream, particularly where subcontracting and labour-hire practices reduce visibility and oversight.
Worst forms of child labour The employment of children in work that deprives them of their childhood, potential, dignity, and is harmful to their physical and mental development, often involving illegal or exploitative conditions.	Worst forms of child labour remain a concern in our supply chain, particularly in upstream sectors such as textiles, laundry services, and agricultural commodities like coffee. These industries are known for sourcing from regions where child labour is more prevalent, especially in early production stages. Limited visibility over multi-tiered supply chains increases the risk that child labour may be present further upstream, beyond direct supplier oversight.
Debt bondage A situation where someone is forced to work to repay an excessive debt that they might never be able to pay off. The debt may be real or not.	Debt bondage is a recognised risk in our supply chain, especially where labour-hire agencies, seasonal work, and migrant labour are involved. Workers may be exposed to exploitative recruitment practices, including the charging of recruitment fees or withholding of wages, which can trap individuals in cycles of debt. This risk is heightened in sectors such as agriculture, meat processing, and outsourced logistics, where oversight is often limited.

Assessing & Addressing Modern Slavery Risks

We are committed to identifying and mitigating the risks of modern slavery within our operations and supply chain.

Assessing Modern Slavery Risks

Preliminary Modern Slavery Risk Assessment

This year, we undertook a preliminary assessment of modern slavery risks across our operations and supply chain. The review was conducted using desktop research and industry best practices, reviewing publicly available sources, including: the *Global Slavery Index (Walk Free Foundation)*; and *OECD Due Diligence Guidance*.. These sources provided a foundational understanding of potential exposure to modern slavery practices.

The assessment focused primarily on Sirrom's tier 1 suppliers, applying a range of risk indicators to identify areas of concern. These included:

- **Sector and industry risk** – evaluating the nature of goods and services provided and their known vulnerabilities.
- **Product and service risk** – considering whether specific categories are commonly associated with exploitative labour practices.
- **Geographic risk** – assessing the countries of origin and operational locations for elevated risk profiles.
- **Supply chain model risk** – examining the complexity and transparency of supplier relationships.

While still in its early stages, this process establishes a foundation for a more detailed, data-driven risk assessment in the coming reporting period. Future efforts will focus on comprehensive supply chain mapping and direct supplier engagement to further identify and mitigate risks.

How Do We Address Our Modern Slavery Risks?

Our Policies & Procedures

To prevent modern slavery in our operations and supply chains, we have established key policies and procedures, including:

- **Modern Slavery Policy** – Demonstrates our commitment to eradicating modern slavery.
- **Whistle Blowing Policy** – Encourages reporting of unethical practices, including modern slavery without fear of retaliation.
- **Code of Conduct** – Sets expectations for responsible behaviour, focusing on human rights and legal compliance.
- **Grievance and Disputation Procedure** – Ensures a consistent process for reporting and resolving grievances and disputes.
- **Human Rights and Modern Slavery – Monitoring and Auditing Procedure** – Ensures compliance with ethical standards and human rights obligations, including the prevention of modern slavery, child labour, and exploitative working conditions.

Due Diligence Processes

We are actively developing a structured due diligence framework to be embedded within our supplier onboarding processes and supplier contract renewal process. This will screen prospective suppliers specifically in relation to modern slavery and broader human rights risks.

This framework will include defined screening criteria, documentation requirements, and a planned supplier audit programme to ensure compliance with legal, ethical, and human rights standards.

Internally, a training programme for managers has been established to raise awareness of modern slavery risks and ethical employment practices. We will work to develop mechanisms to fully measure or qualify the level of understanding and adherence among staff. Some training is available to employees, but no formal training programme for suppliers has been implemented at this stage.

Due Diligence Processes (Cont.)

Our current supplier engagement approach emphasises building strong relationships with key partners. Sirrom has also introduced several internal measures to support ethical labour practices:

- **Legal Employment Verification:** All prospective employees undergo probity checks to confirm their legal right to work in Australia, including verification of visas and work permits where relevant.
- **Prevention of Exploitation:** Applicant age is verified through official identification documents (e.g., passport, driver's licence) to prevent child labour and other forms of exploitation.
- **Fair Wages and Working Conditions:** Our Supply Agreement Code of Conduct includes explicit clauses on legal and regulatory compliance, as well as human rights obligations. Suppliers are required to acknowledge and adhere to these standards as a condition of engagement. Compliance is monitored through documentation collected during onboarding such as licences, insurances, and accreditations and will be reinforced through the planned audit programme. Non-compliance will trigger corrective actions, with escalation to suspension or termination of supply arrangements where necessary.
- **Migrant Labour Risk Assessment:** While a formal process to identify low-skilled migrant workers in our supply chain is not yet in place, current exposure is assessed as limited and low risk. Potential areas of concern include warehouse operations and meat processing, although these are typically managed by large, reputable suppliers with established compliance frameworks, further reducing the assessed level of risk.

Monitoring & Auditing

To enhance oversight and accountability, Sirrom is expanding its procurement capabilities. A dedicated team member has been appointed to lead supplier audits, supported by a structured annual audit plan set for release in December 2025 and implementation from January 2026. These audits will serve as a key mechanism for assessing supplier adherence to legal, regulatory, and human rights obligations outlined in our Supply Agreement Code of Conduct. Over time, this process will also support the development of relevant performance and compliance KPIs, enabling us to monitor trends and drive continuous improvement.

Remediation Processes

To date, no instances of modern slavery have been identified within our organisation's operations or supply chain. Nonetheless, we recognise the importance of having a clear and effective response framework in place should such an issue arise.

In the event that modern slavery is suspected or confirmed, our organisation will take immediate and decisive action, including:

- Conducting a thorough investigation to understand the nature and extent of the issue.
- Engaging with relevant authorities, stakeholders, and experts to ensure appropriate legal and ethical responses.
- Collaborating with the supplier or business partner to address root causes and implement corrective actions.
- Providing support to affected individuals, including access to remediation measures and referral to specialist services.

We are committed to continuous improvement and will progressively enhance our monitoring and response capabilities.



Looking Forward

At present, our organisation does not have a formalised process for screening prospective suppliers specifically in relation to modern slavery or broader human rights risks. However, we are actively developing a structured due diligence framework to be embedded within our supplier onboarding process.

This framework will include:

- **Initial Screening** – All new suppliers will be evaluated during onboarding against defined criteria relating to modern slavery, human rights, and ethical business conduct.
- **Documentation and Evidence** – Suppliers will be required to submit relevant documentation such as policies, insurance certificates, licences, and accreditations to demonstrate compliance with our standards.
- **Ongoing Monitoring** – Supplier compliance will be tracked through a scheduled audit programme, supported by follow-up reviews and corrective actions where necessary.
- **Continuous Improvement** – The framework will be reviewed regularly to ensure alignment with evolving legislation, stakeholder expectations, and industry best practice.

Assessing the Effectiveness of our Modern Slavery Management Actions

As this is our first year of developing a modern slavery statement and identifying our risks, we are in the early stages of assessing the effectiveness of our actions. Here's our approach thus far:

Baseline Establishment

- **Initial Data Collection** – We have gathered baseline data through initial supply chain mapping and risk identification, including key supplier information such as cost, location, products/services, industry and supply chain model.

Continuous Improvement

- **Regular Reviews** – We will begin to conduct regular reviews of our data, processes and policies to identify areas for improvement.
- **Stakeholder Engagement** – We will engage with stakeholders, including employees, suppliers, and external experts, to gather insights and enhance our management practices.



Looking Forward

Over the next 12 months, we plan to focus on the following initiatives to enhance our efforts in combating modern slavery:

- **Implement modern slavery training into supplier and employee onboarding processes -** Integrate modern slavery training into supplier and employee onboarding processes, develop a comprehensive Supplier Code of Conduct and training modules
- **Develop and implement supplier questionnaires as part of onboarding and due diligence processes -** Develop and implement a Modern Slavery Supplier Self-Assessment Questionnaire (SAQ) to assess how suppliers are managing their modern slavery risks. Embedding this process into onboarding and due diligence processes.
- **Undertake a comprehensive modern slavery risk assessment –** Building on Sirrom's initial scoping assessment, conduct a deeper, targeted review of suppliers flagged as potentially high risk.
- **Develop a structured and formalised supplier engagement process -**Develop a structured and formalised supplier engagement process to strengthen modern slavery risk management across Sirrom's supply chain.
- **Embed modern slavery communications across operations -** Establish a structured communication process to support transparency and accountability in Sirrom's modern slavery response.
- **Update supplier contractual obligations -** Update supplier contracts to explicitly address modern slavery issues, ensuring all new and renewed contracts include these clauses, by collaborating with legal and procurement teams to make suppliers aware of and committed to addressing these risks.
- **Formalise modern slavery grievance mechanisms -** To ensure safe, accessible, and effective channels for raising concerns related to modern slavery, grievance mechanisms will be formalised in alignment with Sirrom's Whistle blowing Policy. These mechanisms will be inclusive of employees, suppliers, and supplier staff to support both formal and informal reporting
- **Develop a comprehensive monitoring and evaluation framework -** Develop a comprehensive monitoring and evaluation framework to track, assess, and improve Sirrom's efforts to prevent and address modern slavery risks across its operations and supply chain
- **Establish a process for remediation -** Develop clear remediation protocols for addressing confirmed or suspected cases of modern slavery, including escalation procedures and response timelines



**Great food,
by great people.**

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