

MODERN SLAVERY STATEMENT 2024-25

1. Identity of the Reporting Entity

This Modern Slavery Statement is made by Lords Group NSW Pty Ltd (ABN 15 626 887 232) and its wholly owned subsidiaries Lords Property Group Pty Ltd (ABN 65 169 544 414), and Lords Group Commercial NSW Pty Ltd (ABN 33 632 970 828), for the financial year ending 30 June 2025.

2. Structure, Operations, and Supply Chains

Lords Group is a visionary construction company focused on transforming Sydney's commercial and residential properties and spaces. Our core mission is to harness the collective capabilities and extensive experience of our team, to deliver projects that exemplify the highest standards of quality and performance. We thrive in collaboration with clients and delivery partners who share our unwavering commitment to common values and ethical business relations.

Our operations are based in Parramatta, Sydney, and supported by approximately 65 direct employees and a workforce of on-site subcontractors and labour hire personnel.

We engage with approximately 75 direct suppliers. Our procurement is centred around three primary categories:

- **Labour:** Qualified trades, general labour hire, and site-based contractors.
- **Materials:** Construction materials including concrete, timber, steel, and electrical components and appliances.
- **Services:** Site services such as security, commercial cleaning, and facilities management.

Apart from some foreign suppliers and manufacturers, the majority of our supply chain is based in Australia.

3. Modern Slavery Risks in Our Operations and Supply Chains

We acknowledge that the property and construction sector accounts for an estimated 18% of global modern slavery victims. Consistent with our *Modern Slavery Policy*, we focus our risk assessment on three High-Risk Focus Areas:

- **Labour:** Use of labour hire companies, multi-tiered subcontracting, and employment of migrant workers.
- **Materials:** Sourcing of materials such as timber, steel, aluminium, plasterboard, and mined stone (e.g., granite or sand).
- **Services:** Cleaning and security services, which often rely on vulnerable workforces.

4. Actions Taken to Assess and Address Risks

During this inaugural reporting period, Lords Group has taken the following foundational actions to establish our anti-slavery framework:

- **Policy Creation:** We formally developed and secured CEO approval for the *Lords Group Modern Slavery Policy*, establishing our zero-tolerance standard for all personnel and suppliers.
- **Governance:** We have integrated modern slavery risk management into our core values and assigned responsibility for oversight to our leadership team.
- **Contractual Updates:** We have commenced updating our standard subcontractor and vendor agreements to include modern slavery clauses requiring compliance with our standards.
- **Reporting Channels:** We have developed a Whistleblower Policy and anonymous reporting channels to protect individuals who speak up in good faith.

5. Assessing the Effectiveness of Our Actions

We are building a continuous improvement model. For this baseline year, we assess effectiveness via the following KPIs:

- **Policy Adoption:** 100% of the leadership team briefed on the new policy requirements.
- **Risk Mapping:** Initial identification and mapping of Tier 1 suppliers within our three High-Risk Pillars.

6. Consultation with Owned or Controlled Entities

Lords Group has consulted with its internal business units and project leads to ensure a unified and accurate approach to the disclosures in this statement.

7. Roadmap for Future Action

Lords Group recognises that our journey is iterative. Our planned actions for the next 12 months include:

- **Risk Assessment:** Further developing our modern slavery risk assessment.
- **Staff Training Roll-out:** Developing and rolling out mandatory modern slavery awareness training to all staff members to ensure risk recognition at the site and office levels.
- **Enhanced Due Diligence:** Implementing supplier screening questionnaires for all new subcontractors in our three High-Risk Pillars.
- **Supply Chain Visibility:** Commencing efforts to map risks beyond Tier 1, focusing on the origin of raw materials used in our projects.

8. Approval

This Modern Slavery Statement was approved by Jad Maroun, in his capacity as the Sole Director and principal governing body of Lords Group NSW Pty Ltd, on 18 December 2025.

This statement is signed by Jad Maroun as the Sole Director, being a responsible member of Lords Group NSW Pty Ltd as defined by the Modern Slavery Act 2018 (Cth).

A handwritten signature in black ink, appearing to read 'Jad Maroun'.

Founder & CEO

Lords Group