

Modern Slavery Statement

Simonds Group Limited Modern Slavery Statement FY2025

Simonds Group Limited presents this Modern Slavery Statement for the year ending 30 June 2025 (**FY2025**). Approved by the Board of Directors, this statement reinforces our commitment to safety, sustainability, and human rights as we assess and address modern slavery risks in our operations and supply chain.

This statement has been prepared in accordance with the reporting requirements of Australia's *Modern Slavery Act 2018* (Cth) (**the Act**) and associated guidelines. It will be reviewed and updated annually.

About us

Simonds Group Limited (ACN 143 841 801) (**Simonds Group**) is one of Australia's largest volume home builders, with sites and display homes located across the Australian eastern seaboard and South Australia.

Our product range includes single and double-storey homes and townhomes targeted to purchasers in the metropolitan areas of the state capitals and in large regional centres. In FY2025 Simonds Homes was engaged in construction works across 1,526 home sites.

Simonds Group operates wholly within Australia, using Australian building and construction suppliers, contractors, trades and employees.



Our Structure

Simonds Group is an ASX Listed Company (ASX: SIO) operating through the following entities:

- Simonds Group Limited
- Bridgeman Downs Land Projects Pty Ltd
- Discover Developments Pty Ltd
- Discover Gisborne Pty Ltd
- Jackass Flat Developments Pty Ltd
- Madisson Homes Australia Pty Ltd
- Simonds Assets Pty Ltd
- Simonds Corporate Pty Ltd
- Simonds Homes NSW Pty Ltd
- Simonds Homes Victoria Pty Ltd
- Simonds IP Pty Ltd
- Simonds Land Development Pty Ltd
- Simonds Personnel Pty Ltd
- Simonds Queensland Constructions Pty Ltd
- Simonds SA Pty Ltd
- Simonds WA Pty Ltd
- Simond DFH Pty Ltd

Head Office

- Level 1, 570 St Kilda Road, Melbourne Victoria, 3004
- ***Tower 2, Level 17, 727 Collins Street, Docklands VIC 3008

Victoria

- 17-19 Wills Street, Bendigo VIC
- 105-107 Argyle Street, Traralgon VIC
- Unit 9, 22-30 Wallace Avenue, Point Cook VIC
- 231 Anstruther Street, Echuca VIC
- *5-7 Clarence Street, East Bentleigh VIC
- 110-112 Graham Street, Wonthaggi VIC
- 477 Latrobe Terrace, South Geelong VIC
- *630B Wyndham Street, Shepparton VIC
- 1/88 Northgate Drive, Thomastown VIC
- ^224 Hare Street, Echuca VIC
- ^74 Wyndham Street, Shepparton VIC
- ^Ground Floor, 296 Ferntree Gully Road, Notting Hill VIC
- 5/100 Bald Hill Road, Pakenham VIC.

New South Wales

- Unit 503, 7/9 Irvine Place, Bella Vista NSW

Queensland

- 3894 Pacific Highway, Loganholme QLD

South Australia

- 280 Pulteney Street, Adelaide SA

*Denotes offices Simonds ceased operations during FY2025

** Denotes offices Simonds commenced operations during FY2025

*** Simonds commenced operations in its new head office on 1 August 2025

^Denotes offices Simonds acquired following the acquisition of Dennis Family Homes Pty Ltd on 1 March 2025

Reporting entities

This statement applies to Simonds Group Limited ACN 143 841 801 and each wholly owned entity of Simonds Group including:

Trading

- Simonds Homes NSW Pty Ltd
- Simonds Homes Victoria Pty Ltd
- Simonds SA Pty Ltd
- Simonds Queensland Constructions Pty Ltd
- Simonds Land Development Pty Ltd
- Simonds DFH Pty Ltd (from 1 March 2025)

Non - Trading

- Bridgeman Downs Land Projects Pty Ltd
- Discover Developments Pty Ltd
- Discover Gisborne Pty Ltd
- Jackass Flat Developments Pty Ltd
- Madisson Homes Australia Pty Ltd
- Simonds Assets Pty Ltd
- Simonds Corporate Pty Ltd
- Simonds IP Pty Ltd
- Simonds Personnel Pty Ltd
- Simonds WA Pty Ltd

During the reporting period, Simonds Group actively engaged and consulted with the above subsidiaries in the development of this statement.

Simonds Group discussed details of the Act's reporting requirements and reached an agreement on both the Modern Slavery program and the Modern Slavery statement for the Group. The directors of each subsidiary have approved this Statement.

Our supply chain

Simonds Group has an annual supply chain spend of circa \$524.8m with approximately 1,500 direct suppliers and contractors nationwide. The diverse range of contractors within our construction business includes carpenters, concreters, bricklayers, plumbers, plasterers, electricians, engineers, and cleaners.

Our direct and indirect procurement of goods spans the full spectrum of products required to build single- and double-storey detached homes and townhomes, including bricks, tiles, concrete, plumbing supplies, household appliances, lighting, hardware, and a wide range of timber and metallurgical products.

Across our offices and training facilities we use various office supplies, electronics and garments. We also require a variety of associated services to maintain and support our premises and staff.

Most of our suppliers and contractors are based in Australia and we do not directly procure any products or raw materials from overseas. We understand that a number of our direct suppliers have their own complex and diverse supply chains for manufactured products and raw materials that can extend beyond Australian borders, and therefore we identify this extended supply chain as a potential at-risk area for modern slavery.



Risk assessment

Simonds Group has undertaken a detailed risk assessment of its operations and supply chain to identify products, suppliers and contractors at risk of modern slavery. Each year the risk assessment is reviewed and updated to reflect changes to our business.

Our risk assessment process divides our annual expenditure into 35 procurement categories, and each category is scanned for potential modern slavery risks in relation to the specific service, product, raw material, supplier and country of origin. Based on our risk assessment, the following key areas may present modern slavery risks within our supply chain and require ongoing monitoring:

- Contractors – we directly and indirectly engage a wide range of contractors including carpenters, concreters, bricklayers, plumbers, plasterers, electricians, engineers, and surveyors. We do not engage underpaid and unskilled contract labourers.
- Procurement of goods and materials – by working in close collaboration with our suppliers, we can ensure that our building materials and other resources are sustainably acquired and that key suppliers hold the relevant accreditations for their respective industries. For example:
 - » Under the Global Slavery Index, there is a high risk of modern slavery associated with the production of timber in foreign countries. As timber products comprise a significant proportion of most home builds, we ensure all timber sourced by the Group is Australian Forestry Standard or Forest Stewardship accredited.
 - » With respect to electronics, Simonds Group only uses recognised international brands of laptops, computers and mobile phones. We also use a range of household electronics from Australian manufacturers and suppliers that contain domestic and internationally made electrical components
 - » We provide a portion of our staff and contractors with branded uniforms from an Australian supplier.

Risk mitigation

Simonds Group has implemented a number of measures to mitigate the risk of modern slavery within our operations and supply chains.

Safety culture

We proudly promote a safety-first culture to all our stakeholders and have formal engagement protocols and business continuity programs. Simonds Group is recognised as an industry leader in safety in the residential building sector, has a strong presence in the Volume Building Safety Alliances in the states we operate. We are committed to continuous improvement and 'best safety practice'.

Contractor management

Through our contractor management tool LinkSafe, we monitor and report on contractor compliance with regulations, health and safety standards and workplace expectations. LinkSafe includes questions to address modern slavery risks and provides contractors with a discrete reporting avenue for any modern slavery issued identified on our sites.

Supplier Code

All our major suppliers are required to comply with our Supply Chain and Contractors Responsibility & Commitment Statement (Supplier Code). Our Supplier Code specifically addresses our expectations regarding the elimination of modern slavery risks within our supply chain and includes obligations on suppliers and contractors to take steps to identify and manage modern slavery risks within their organisation and supply chain; ensure they do not use any form of forced, compulsory, child or slave labour; and provide each employee with an employment contract and terms that adhere to relevant employment laws.

Suppliers and contractors who do not comply with our Supplier Code are at risk of contract termination. To monitor this, we carry out audits and inspections of suppliers and building sites on an ongoing basis to ensure construction standards and occupational health and safety obligations are adhered to, and that the rights of workers are respected according to law. We use a detailed supplier due diligence questionnaire that deals specifically with modern slavery risks and forms a mandatory part of our supplier onboarding.

Governance

As an ASX listed company, Simonds Group has a robust governance framework. Our Modern Slavery Policy sets out our commitment to ensuring modern slavery does not occur in our business or supply chain. Our Whistleblower Policy specifically addresses the confidential reporting of modern slavery within our operations and our employees are required to undertake regular training on internal processes, procedures and changes to regulations in our industry.

Actions

We are committed to improving our approach to the elimination of modern slavery risks within our supply chain. Our actions to address modern slavery risks in previous years include:

- Requiring contractors and suppliers to complete a modern slavery risk questionnaire during onboarding.
- Undertaking a risk assessment of our electrical parts, bricks and timber supply chains to map and better understand the source of building materials we use to construct our quality homes.
- Presenting a seminar on modern slavery to each of our executive, senior management and procurement teams.

Focus on Concrete

In FY2025, Simonds Group undertook a modern slavery risk assessment of its concrete supply chain, with a focus on production and supply. Approximately \$16.9m of our annual expenditure on goods and services is directed towards concrete suppliers and associated service providers.

Based on this risk assessment, it has been determined that Simonds Group has a low risk of modern slavery within its concrete supply chain. In conducting this risk assessment, the Simonds Group concrete supply chain can be broken down into two layers and three categories, being:

- First Layer – contract directly with Simonds
 - » Producers and Suppliers; and
 - » Subcontracted concreters.
- Second layer – contract directly with Producers and Suppliers
 - » Suppliers of raw materials.

First Layer – Producers and Suppliers

The first layer in our concrete supply chain is Australian based concrete producers who also supply. In completing our assessment, we identified Barro Group, Boral, Hallett Concrete and Heidelberg Materials as key producers who also supply concrete to Simonds Group (Producers and Suppliers).

The main modern slavery risks identified in relation to these first-layer Producers and Suppliers are:

- engaging suppliers of cleaning and security services, which traditionally have a high percentage of migrant workers who are generally more vulnerable to labour exploitation; and
- sourcing raw materials, plant and equipment from countries which do not have a solid government framework to deter modern slavery.

The reported actions taken by Producers and Suppliers to mitigate risk include:

- Prequalification assessment and comprehensive pre-screening.
- Using a supplier risk profile tool, underpinned by internationally recognised data, which attributes an initial risk rating to each supplier based on location and industry sector.
- Sourcing overseas products from tier 1 suppliers who have comprehensive business ethic, whistle-blowing, and human right policies in place.
- Providing external independent whistleblower service to employees and external stakeholders to raise concerns on an anonymous basis.

In brief, our Producers and Suppliers are large well-reputed companies who are highly aware of their legal and ethical obligations in Australia, and therefore we have identified the first category as low risk.

Second layer – Subcontracted concreters

The second layer in our concrete supply chain is locally based concreters who provide the service of pouring concrete. These subcontractors do not supply concrete to Simonds and are solely engaged to pour concrete for our projects. These subcontractors are often sole traders or small businesses that are not required to provide a modern slavery statement, and therefore, it is difficult to verify the existence of modern slavery practices by these subcontractors. For resourcing reasons, Simonds often use various local subcontractors, and it is uncommon for us to use a large subcontractors across a large number of projects.

As part of our site induction process, new subcontractors are required to sign terms and conditions that include requirements to:

- not subcontract without the Group's consent (to avoid pyramid contracting);
- comply with the legislation applicable to the State and services being provided in respect of health and safety, wages and entitlements; and
- confirm that they (and their subcontractors or suppliers) do not, at any time, by act or omission, do anything which is a breach of or unlawful under foreign corrupt practices laws or otherwise engage in 'modern slavery'.

We have categorised the second layer as low to medium risk.

Third layer – Suppliers of raw materials

The third layer in our concrete supply chain is suppliers of raw materials to Producers and Suppliers. At this stage we are reliant on the established processes of our Producers and Suppliers to manage modern slavery risks within their supply chain, which include:

- Ensuring that a majority of their suppliers operate in Australia and are required to comply with Australian Modern Slavery legislation.
- Suppliers being rated as having a very high inherent risk of modern slavery require a positive outcome from an on-site supplier audit and senior management approval. If the audit identifies the need for corrective action, the action must be monitored and appropriate steps must be taken.
- Sourcing overseas products from tier 1 suppliers who have comprehensive business ethics, whistle-blowing, and human right policies aligning with their own business practices.
- Including key requirements in their supplier code of conduct requiring suppliers to not use child labour, ensure compensation and benefits comply with minimum wage principles and ensure workers have safe and healthy working conditions amongst other things.

Although the greatest potential risk of modern slavery was identified within this layer, the relative maturity of these Producers and Suppliers with their reporting obligations provides comfort that potential risks are effectively managed and for these reasons we have identified our third layer suppliers as low.



Assessing effectiveness & the future

As part of our Group risk program, the Chief Legal Officer and Chief Financial Officer are responsible for assessing and addressing modern slavery risks, with oversight from the Chief Executive Officer and the Board.

The modern slavery risk assessment and approach is reviewed annually and reported to the Audit and Risk Committee.

Recommendations will be actioned as part of our regular risk and compliance programs. The Chief Legal Officer and Chief Financial Officer report to the Audit and Risk Committee on a bi-annual basis on steps taken to address any identified gaps in our modern slavery risk management approach.

On an ongoing basis our procurement team:

- Ensure suppliers and contractors complete due diligence questionnaires and agree to the terms of our Supplier Code;
- Continue to engage with suppliers to greater understand the source of manufactured products;
- Where risk issues are identified with a supplier, ensure that corrective action plans are created and implemented; and
- Continue to engage with suppliers to identify points of improvement and track modern slavery risk awareness levels.

In FY25, modern slavery training sessions (which included an explanation of the Group's obligations, exposure to risk and identification of risks associated with modern slavery) were given by the Group Legal team to the Group's Senior Management team.

As part of our initiative to better identify and mitigate modern slavery risks within our supply chain, Simonds Group are looking to implement an interactive online employee modern slavery quiz to better educate our team on modern slavery risks.

THIS STATEMENT WAS APPROVED BY THE BOARD OF SIMONDS GROUP LIMITED ON 28 NOVEMBER 2025

Rhett Simonds
Chief Executive Officer and Executive Chair

