



JOINT MODERN SLAVERY STATEMENT

FINANCIAL YEAR ENDING 30 JUNE 2021



**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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This joint modern slavery statement for the year ending 30 June 2021 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.

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 110 employees, all of whom are based in Australia.

For our construction work, we also engage a number of sub-contractors. In 2020-2021, 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. All of these 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

135



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.

An aerial, black and white photograph of a city neighborhood. The central focus is a modern, multi-story residential building with a light-colored facade and dark window frames. It features a prominent gabled roof section with a series of skylights. The building is surrounded by other residential structures, including older houses with gabled roofs and a taller brick building with a tower-like structure on the right. In the background, a large body of water is visible, along with more city buildings and a bridge. The overall scene depicts a dense urban environment with a mix of architectural styles.

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 continue to be committed to ensuring that our sub-contractors adhere to appropriate standards and regulations through relevant policies and procedures.

We will also be implementing improved induction questionnaires in our Hammertech system to clarify engagement standards for all workers entering our sites



**REVIEWING OUR
SYSTEMS**

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. Further actions that we anticipate taking include:

- continue to engage 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;
- continue to review and amend supplier agreements to include terms relating to modern slavery;
- implementing a modern slavery policy and supplier code of conduct; and
- continue to train staff to increase awareness of modern slavery.

CONSULTATION

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.

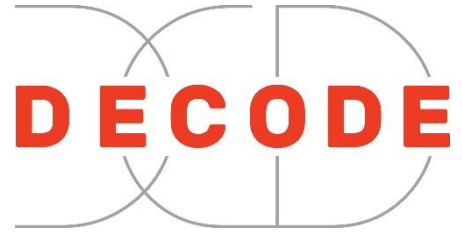
APPROVAL

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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 Limited (ACN 611 188 339), on 4 March 2022.



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



www.decodegroup.com.au