



JOINT MODERN SLAVERY STATEMENT

FINANCIAL YEAR ENDING 30/06/2023



DECODE

**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



AGENDA

1. ABOUT US
2. COMPANY VALUES
3. OUR STANCE AGAINST MODERN SLAVERY
4. RISK ASSESSMENT AND MITIGATION APPROACH
5. ASSESSING EFFECTIVENESS
6. CONSULTATION PROCESS WITH ENTITIES OWNED OR CONTROLLED BY DECODE
7. APPROVAL



01

ABOUT US

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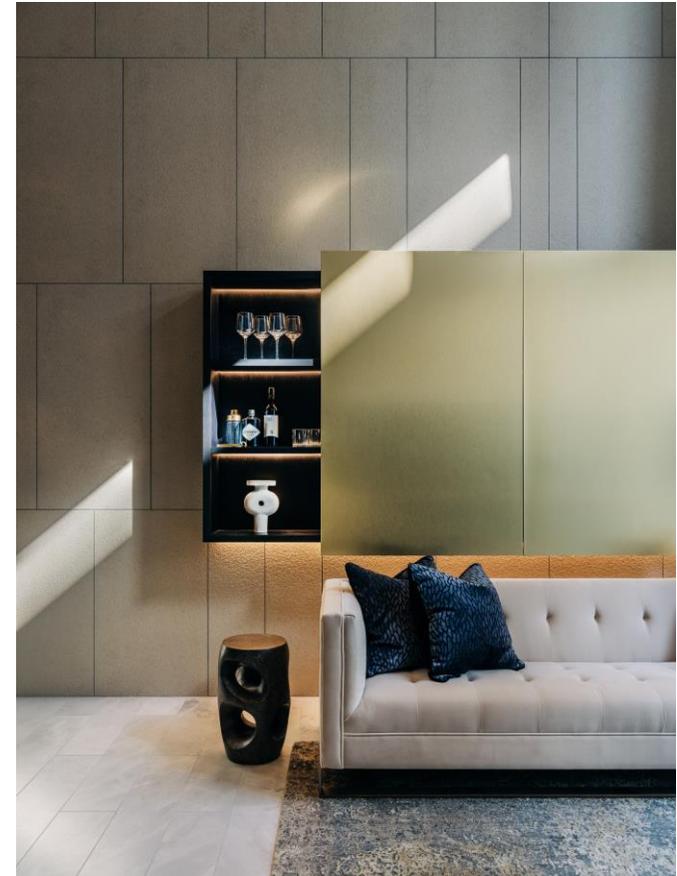
This joint modern slavery statement for the year ending 30 June 2023 has been prepared by Decode Corp Pty Ltd (ACN 629 285 534) (**DC**) and Decode Group Pty Limited (ACN 611 188 339) (**DG**), both of which are Australian proprietary companies. The registered office address for both DC and DG is Level 8, 52 Alfred Street, Milsons Point NSW 2061.

The sole director of both DC and DG is Hussein El Rihani.

DC and DG are associated entities forming a corporate group operating a construction business trading as 'Decode'.

Founded in 2008, Decode doesn't just build - we deliver our clients' vision. From commercial high-rises to educational institutions, we operate across the entire spectrum of the construction sector.

Building Relationships is our motto, and it underpins every aspect of our design, construction and delivery processes. We pride ourselves on our close partnerships and proactive communication with our clients and teams.



02

COMPANY
VALUES



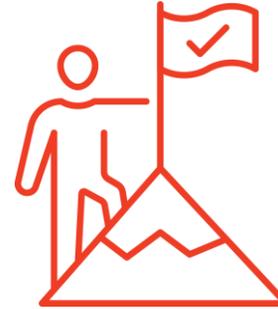
COMPANY VALUES

Our core values underpin everything we do. By living our values every day, our team is empowered to deliver optimal outcomes to our clients.



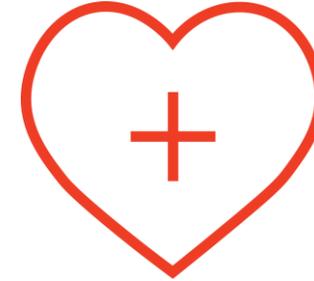
Lift as One

United under **one vision**, we work with our clients and partners to deliver excellence.



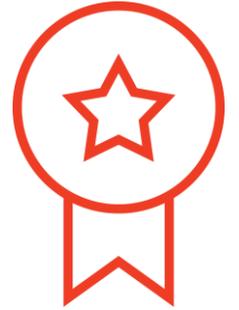
Go the Extra Mile

We challenge ourselves to **go above and beyond** in pursuit of quality and to achieve our client's vision.



Commit to Care

We are committed to sustainability & customer care and above all, the **safety and wellbeing** of our clients, partners and teams comes first.



Deliver Excellence

We promise, we deliver. We always strive to produce the best possible outcomes for our clients with no compromises.

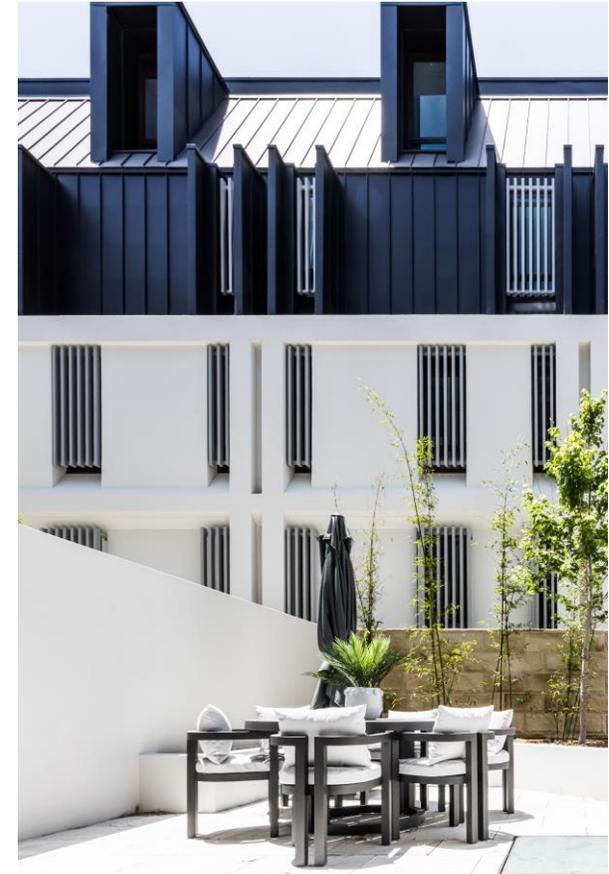
OUR OPERATIONS AND STRUCTURE

Our business is focused on projects located in the Sydney metropolitan area with expansion planned into the central coast region. DC and DG own and control eight wholly-owned subsidiary Australian entities, which also form part of the Decode corporate group.

The Decode corporate group employed approximately 110 employees in FY23, all of whom are based in Australia.

We engage a broad range of trade-contractors and suppliers totalling approximately 760 in FY23.

Products used in our construction projects are sourced from a variety of suppliers, all who operate in Australia. These products include reinforcing steel, concrete, windows, plumbing, tiles, appliances and flooring.



OUR SUPPLY CHAIN



OUR SUPPLY CHAIN

Our supply chain includes all relevant products used in construction work, as well as the use of labour, hired either directly through a labour hire firm, or indirectly contracted through trade contractor.

While our suppliers are predominantly based in Australia, this may not represent the country of origin of materials or products supplied to our operations. We are aware that they, in turn, source product and raw materials from overseas.



03

OUR STANCE
AGAINST
MODERN
SLAVERY

OUR APPROACH TO MODERN SLAVERY



OUR APPROACH TO MODERN SLAVERY

We are committed to continuing to develop and strengthen best practices that address Modern Slavery risks.

Decode firmly believes in the protection of human rights, including the absolute rights to freedom from slavery and forced labour, and to freedom from inhuman or degrading treatment or punishment.

With respect to our direct operations, we have considered and believe that our current practices assist in reducing the risk of Modern Slavery developing or occurring.

We have a dedicated human resources function, the responsibility of which is to seek compliance with applicable regulatory terms and conditions of employment.

We are committed to the implementation of effective systems and processes to continue to raise the awareness of Modern Slavery risks within our Business operations.



04

RISK
ASSESSMENT
& MITIGATION
APPROACH

RISKS ASSESSMENT

We have undertaken assessments of Modern Slavery risks in our operations and supply chains, over the reporting period, to consider the risk that we are causing, contributing, or directly linked to Modern Slavery practices.

Due to the nature of our industry, we could be indirectly exposed to the risk of Modern Slavery including human trafficking and forced labour through our suppliers and trade contractors.

Following the assessment of our industry, areas of vulnerability were found to include the risk of underpaid wages of migrant workers by subcontractors, and potential for debt bondage of workers in the supply chain with materials sourced from the Asian region.

We use several processes to assess the potential risk of Modern Slavery in operations, including site induction checks, employee training and prequalification questionnaires for suppliers and subcontractors.



ACTIONS TAKEN

ACTIONS TAKEN ✓

Action	FY23
Documentation	✓ Publish a Modern Slavery Policy
Due Diligence	✓ Set up a Modern Slavery questionnaire on our site induction software which is to be completed by all parties that enter our projects sites.
	✓ Provided a Modern Slavery Incident form so employees, suppliers or subcontractors can report incidents or risks identified in the construction supply chain
Training	✓ Train employees on Modern Slavery Policy and incorporate the policy in employee handbook
	✓ Train employees on how to identify, assess and respond to Modern Slavery risks
	✓ Train construction supply chain on how to identify, assess and respond to Modern Slavery risks (incorporated into induction software HammerTech)



MITIGATION APPROACH

Goals	FY24
Documentation	<p>Review our subcontract agreements and Insert a 'Modern Slavery clause' to ensure a legal requirement to report Modern Slavery incidents.</p> <p>Update internal project delivery procedures to provide that our construction supply chain must have completed a Modern Slavery questionnaire.</p>
KPI testing	<p>Set-up and test Key Performance Indicators, for example track # of responses from suppliers, subcontractors and labour hire firms with respect to questionnaires and prequalification checks.</p>
Awareness	<p>Raise awareness of Modern Slavery laws and risks through pre-qualification checks and site induction checks. Review effectiveness of questionnaires and compliance to our policy and procedures.</p>
Reporting	<p>Review incident reporting effectiveness to ensure any risks identified have followed the prescribed reporting process.</p>
Training	<p>100% completion rate for employee training on the Modern Slavery policy; including any new staff employed by the business</p>



05

ASSESSING
EFFECTIVENESS

ASSESSING EFFECTIVENESS & REVIEWING OUR SYSTEM

In FY23 we have focused on the establishment of the Modern Slavery policy and engaged our procurement and safety departments to assess, and address identified Modern Slavery risks in our industry.

We are satisfied that going forward we will be better positioned to more effectively assess and educate all suppliers and subcontractors in our construction supply chain.

For the next reporting period, we intend to assess the effectiveness of our noted actions and address Modern Slavery risks in our operations and supply chain by:

- Conducting an annual review of the effectiveness of Modern Slavery processes we have put in place and look at ways to improve them.
- Where Modern Slavery risks have been identified by employees or trades, ensuring that the correct reporting process has been followed as per our Modern Slavery policy.
- Ensure pre-qualification and site induction questionnaires are being done consistently and accurately.
- Run KPI reports on the number of employees vs the number trained; and the number of pre-qualification questionnaires sent to supplier's vs the number returned correctly.



ASSESSING EFFECTIVENESS & GOALS

Over this reporting period, we assessed the effectiveness of our actions across four key performance areas:

1. Governance & due diligence;
2. Procurement & supply chain;
3. HR practices, training & education;
4. Grievances and reporting.

With respect to each of these focus areas, we have taken proactive steps and will continue to develop KPIs and collect statistic data to assess the effectiveness of our actions in the next reporting period.

These include:

- The percentage of contracts with Modern Slavery clauses included;
- Number of suppliers completing our Modern Slavery questionnaire;
- Completion rates for modern slavery awareness training;
- The number of Modern Slavery cases identified and remediated.

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with our approach to continuous improvement and compliance as a business.



06

CONSULTATION
PROCESS WITH
ENTITIES
OWNED OR
CONTROLLED
BY DECODE

CONSULTATION PROCESS WITH ENTITIES OWNED OR CONTROLLED BY DECODE

DC and DG own or control eight wholly-owned subsidiary Australian entities, which also form part of the Decode corporate group.

- During the reporting period this statement covers, we have engaged and consulted with companies we own or control in the establishment of this statement.
- We have discussed details of the Modern Slavery Act 2018's reporting requirements; information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.
- Modern Slavery training was conducted, and the Modern Slavery Policy and incident form was provided to all staff from all of the entities controlled by Decode



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APPROVAL

APPROVAL

This statement was approved by Hussein El Rihani, sole director of Decode Corp Pty Ltd (ACN 629 285 534) and Decode Group Pty Limited (ACN 611 188 339), on 22/12/2023.



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





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