

Modern Slavery Statement

1. Introduction

Allam Property Group ("Allam", "we", "our", "the Group") is committed to conducting business ethically, responsibly, and in a manner that respects and promotes human rights. We recognise that Modern Slavery remains a global, systemic challenge, and we are committed to identifying, assessing, and addressing the risks of Modern Slavery across our operations and supply chains, consistent with our Modern Slavery Policy.

This Modern Slavery Statement outlines the actions we have taken during the reporting period to minimise the risk of Modern Slavery practices, in compliance with the *Modern Slavery Act 2018 (Cth)*.

2. Our Structure, Operations and Supply Chains

2.1 Structure and reporting entities

Allam Property Group's operating activities include residential property development, construction, land development and the operation of land lease communities across New South Wales and Victoria.

A listing of the Allam Property Group entities covered by this Modern Slavery Statement is set out in Appendix A.

The Board is responsible for overseeing the Group's response to modern slavery risks and the approval of this Modern Slavery Statement. The effective control and management of the Group's subsidiaries are exercised by the Board and Executive Management from the Group's Head office at Norwest. All subsidiaries operate under and are subject to the policies and procedures outlined in this Statement.

2.2 Workforce

The Group's workforce includes employees, directors, officers, contractors, labour hire personnel, consultants, and third-party representatives. All members of the workforce are required to comply with our Modern Slavery Policy (refer Appendix B).

2.3 Supply Chains

Our supply chains include primarily domestic suppliers of building materials, professional services, equipment, subcontracting services, and labour. As defined in our Modern Slavery Policy, supply chains encompass all products and services that contribute to our business operations, including those sourced internationally (if applicable).

We expect all suppliers and business partners to uphold ethical labour practices and comply with our Modern Slavery Policy prohibiting all forms of modern slavery, including forced labour, child labour, bonded labour, servitude, and any other form of worker exploitation.

3. Modern Slavery Risks in Our Operations and Supply Chains

3.1 Operational Risks

Given that our direct workforce is employed under Australian workplace laws, we consider the risk of Modern Slavery in our direct operations to be low.

Our workforce comprises approximately 110 FTE, all on employment contracts which are in line with relevant awards and minimum wage requirements, where relevant. We have a dedicated Whistleblower hotline and all employees have access to the CEO.

The Group's commitment to the ethical conduct of business and respect for human rights in the workplace is embedded in our Employee Handbook, including:

- a) Work Health and Safety (WHS) Policy
- b) Code of Conduct;
- c) Gift Receiving and Gift Giving Policy;
- d) Conflict of Interest
- e) EEO, Discrimination Bullying and Harassment Policy;
- f) Flexible Work Policy
- g) Mental Health and Wellbeing
- h) Modern Slavery Policy
- i) Whistleblower Policy.

The Employee Handbook is readily available on the Staff HR portal, and all staff attended mandatory training in February 2026 in relation to the above policies.

However, we recognise the potential vulnerabilities associated with:

- subcontracted labour,
- contract cleaning, security, and site services, and
- the use of temporary or migrant workers by our suppliers.

3.2 Supply Chain Risks

Our construction and development spend is predominantly sourced from Australian suppliers, subcontractors and consultants. In selecting and engaging suppliers, we consider a range of factors, including geographical location, industry and sector exposure, reputational risk and other indicators of potential modern slavery risk.

As a construction and property development business, we recognise that certain areas of our supply chain may present elevated risk of modern slavery, including:

- building materials sourced from high-risk regions,
- labour-intensive trades,
- imported products,

particularly where visibility over upstream suppliers may be limited.

Our Modern Slavery Policy requires suppliers to prohibit all forms of modern slavery, including forced labour, child labour, debt bondage, and other exploitative practices. Suppliers are also expected to comply with applicable workplace laws and standards, including requirements relating to minimum wage, working hours and working conditions.

4. Actions Taken to Assess and Address Modern Slavery Risks

4.1 Policy Framework

We maintain an organisation-wide Modern Slavery Policy that outlines our commitment to eliminating Modern Slavery practices and sets clear expectations for employees and suppliers.

4.2 Supplier Due Diligence

During the reporting period, we continued to strengthen our due diligence processes by:

- conducting initial assessments of new suppliers' risk profiles and ethical sourcing controls,
- requiring suppliers to notify us immediately of any Modern Slavery risks identified in their own operations or supply chains,
- undertaking audits or assessments where risk indicators are present.

Where remediation is not achieved, we reserve the right to terminate the relationship.

Our Top 20 Suppliers and subcontractors which were categorised as medium or higher risk were required to complete a modern slavery questionnaire. These questionnaires were analysed and those suppliers were then reassessed as lower risk.

In addition, from 1 July 2026, all suppliers are required to comply with the Group's modern slavery policy as a term and condition of doing business with us as explicitly stated in our Purchase Order terms.

4.3 Internal Due Diligence

We review our internal systems and processes on an ongoing basis to ensure they remain effective in identifying and eliminating Modern Slavery risks and aligned with industry standards and legislation. For example, a formal modern slavery working group was established during the year.

4.4 Training and Awareness

Managers ensure workers understand the purpose of the Modern Slavery Policy, and training was provided to all employees as part of our new HR system rollout.

4.5 Reporting and Grievance Mechanisms

We provide a reporting mechanism allowing employees and stakeholders to report concerns related to Modern Slavery. Reports can be made confidentially and anonymously and are investigated promptly. Workers are protected from any form of adverse action for raising concerns.

5. Effectiveness Assessment

We evaluate the effectiveness of our actions through:

- monitoring supplier compliance and remediation progress,
- reviewing audit findings where conducted,
- assessing the number and nature of reported concerns,
- reviewing training completion rates, and
- ongoing refinement of our due diligence processes.

As part of our continuous improvement commitment, we regularly update our Modern Slavery Policy to reflect changes in legislation and industry best practice.

6. Consultation Across the Group

Allam Property Group entities operate under a shared governance framework. In preparing this Modern Slavery Statement, a modern slavery working group was established, comprising representatives from relevant functions, including procurement, construction, development, finance and compliance. These stakeholders were consulted to identify and assess modern slavery risks within our operations and supply chains and to inform the development of this Statement. We continue to work collaboratively across the Group to improve identification, assessment and mitigation of Modern Slavery risks.

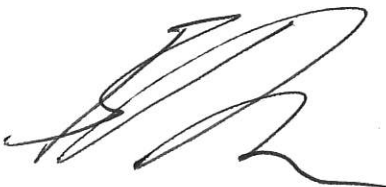
7. Future Commitments

Over the next reporting period, we intend to:

- enhance supplier mapping and risk-rating processes,
- expand worker training on Modern Slavery risk identification,
- further embed compliance controls into procurement processes, and
- strengthen monitoring of high-risk suppliers and categories.

8. Approval

This Modern Slavery Statement was approved by the Board of Directors of Allam Property Group on 30 June 2026.

A handwritten signature in black ink, appearing to read "Ben Javed Allam".

Ben Javed Allam
Director
Allam Property Group

Appendix A - Allam Property Group List of Entities

Appendix B – Modern Slavery Policy



Appendix A

ENTITY NAME	ABN
ALLAM (SALES) PTY LIMITED	17 138 096 321
ALLAM AVIATION PTY LIMITED	94 671 322 955
ALLAM BROS & ASSOCIATES PTY LTD	46 001 609 409
ALLAM BROS PTY LTD	18 001 439 130
ALLAM CONSOLIDATED PTY LIMITED	24 673 803 202
ALLAM DEVELOPMENT NO. 1 PTY LIMITED	15 617 513 005
ALLAM DEVELOPMENTS (VIC) PTY LIMITED	31 669 896 397
ALLAM FINANCE PTY LIMITED	53 654 921 918
ALLAM FORRESTER BEACH PTY LTD	11 607 355 662
ALLAM GABLES PTY LTD	15 607 815 323
ALLAM HOLDINGS PTY LTD	67 001 338 585
ALLAM HOMES (VIC) PTY LIMITED	88 669 897 447
ALLAM HOMES BUILDING (VIC) PTY LIMITED	87 669 897 821
ALLAM HOMES GROUP PTY LIMITED	19 669 895 032
ALLAM HOMES PTY. LIMITED	33 003 798 883
ALLAM LAND NO. 1 PTY LIMITED	69 617 511 681
ALLAM LAND NO. 2 PTY LIMITED	70 617 512 053
ALLAM LAND NO. 3 PTY LIMITED	15 617 512 259
ALLAM LAND NO. 4 PTY LIMITED	99 617 512 615
ALLAM LAND NO. 5 PTY LIMITED	71 636 478 736
ALLAM LAND NO. 6 PTY LIMITED	56 637 205 595
ALLAM LAND NO. 7 PTY LIMITED	91 637 206 109
ALLAM LAND NO. 8 PTY LIMITED	80 637 206 065
ALLAM LAND NO. 9 PTY LIMITED	99 637 206 145
ALLAM LAND NO.10 PTY LIMITED	41 644 750 630
ALLAM LAND NO.11 PTY LIMITED	17 646 466 113
ALLAM LAND NO.12 PTY LIMITED	59 646 466 355
ALLAM LAND NO.14 PTY LIMITED	54 646 466 711
ALLAM LAND NO.15 PTY LIMITED	79 646 466 882



ALLAM LAND NO.16 PTY LIMITED	40 646 467 021
ALLAM LAND NO.17 PTY LTD	64 653 954 833
ALLAM LAND NO.18 PTY LTD	56 653 955 170
ALLAM LAND NO.19 PTY LTD	37 653 955 527
ALLAM LAND NO.20 PTY LTD	70 653 955 670
ALLAM LAND NO.21 PTY LIMITED	15 679 161 392
ALLAM LAND NO.22 PTY LIMITED	75 679 162 013
ALLAM LAND NO.23 PTY LIMITED	57 679 163 627
ALLAM LAND NO.24 PTY LIMITED	75 685 693 118
ALLAM LAND NO.25 PTY LIMITED	76 685 693 501
ALLAM LAND NO.26 PTY LIMITED	71 685 693 985
ALLAM LEGAL PTY LTD	64 626 289 709
ALLAM MHE #1 PTY LTD	55 628 619 170
ALLAM MHE #2 PTY LTD	21 637 741 685
ALLAM MHE # 2 OPERATIONS PTY LTD	54 639 945 412
ALLAM MHE # 3 OPERATIONS PTY LTD	77 639 945 574
ALLAM MHE # 3 PTY LTD	67 638 578 686
ALLAM MHE # 4 PTY LTD	67 653 954 468
ALLAM MHE # 5 PTY LTD	98 653 949 369
ALLAM MHE # 6 PTY LTD	85 662 294 671
ALLAM MHE # 7 PTY LTD	28 662 295 678
ALLAM MHE DEVELOPMENTS PTY LTD	33 647 832 282
ALLAM MHE DEVELOPMENTS NO.2 PTY LTD	91 648 164 621
ALLAM PROPERTY INVESTMENTS PTY LIMITED	83 128 598 238
ALLAM PROPERTIES PTY LIMITED	15 128 601 918
ALLAM PROPERTY GROUP PTY LTD	74 614 339 365
ALLAM TREASURY PTY LIMITED	15 617 513 069
ALLAMPEEK PTY LIMITED	29 166 959 628
BROWN CLOSE PTY LIMITED	40 162 850 893
BALMORAL PARADE PTY LIMITED	57 602 674 484
BARSHINE PTY. LIMITED	94 088 266 773



BARSKY PTY LIMITED	22 146 699 498
BOUNDARY ROAD SCHOFIELDS PTY LTD	69 601 963 795
CAMDEN VALLEY WAY PTY LIMITED	53 145 130 927
CATTAI ROAD PITT TOWN PTY LTD	33 165 418 119
DANALLAM PARTNERSHIP	87 242 015 013
DANALLAM DEVELOPMENTS PTY. LIMITED	79 003 479 043
FOXALL ROAD PTY LTD	18 140 469 236
FAIRWAY DRIVE KELLYVILLE PTY LIMITED	18 145 990 218
HILLVIEW ROAD PTY LIMITED	61 164 971 573
KENSINGTON PARK ROAD PTY LIMITED	84 602 493 970
KILLARNEY PONDS PTY LTD	17 605 895 707
MEHRBAN ALLAM DISCRETIONARY TRUST	44 484 859 203
OKINAWA PTY LIMITED	88 601 963 811
REMEMBRANCE DRIVE PTY LIMITED	37 162 546 250
SIMBA DEVELOPMENTS PTY LTD	73 603 799 220
TERRY ROAD BOX HILL PTY LTD	19 602 918 070
THORNTON WATERS PTY LTD	62 606 351 400
ALLAM DISCRETIONARY TRUST	80 853 138 289
ALLAM FAMILY TRUST	23 654 647 334
BARSKY DISCRETIONARY TRUST	37 879 633 456
ALLAM MHE #2 UNIT TRUST	57 821 965 612
ALLAM MORTGAGE TRUST	64 189 182 816

Modern Slavery Policy

1 Introduction

- 1.1 Allam Homes Pty. Limited ("**the Company**") is committed to eliminating the risks of Modern Slavery and acting ethically and with integrity in all its business dealings. This policy outlines the Company's approach to reducing the risks of Modern Slavery practices within its Supply Chain and operations.
- 1.2 The Company does not use and does not condone, child or forced labour in any of its operations and is committed to ensuring that such practices are not present in its workforce or Supply Chain.
- 1.3 The Company will only do business with Suppliers who fully comply with this policy, or those who are taking verifiable steps towards compliance and will only engage independent contractors who do the same.
- 1.4 The Company does not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical or emotional punishment or abuse, or involuntary servitude.

2 Scope

- 2.1 This policy applies to all Workers of the Company, including persons working for or on behalf of, or providing services to, the Company in any capacity including consultants or third-party representatives.
- 2.2 Workers must comply with this policy at all times.

3 Definitions

- 3.1 **Modern Slavery** describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute Modern Slavery can include, but are not limited to:
 - human trafficking;
 - slavery;
 - servitude;
 - forced labour;
 - debt bondage; or
 - child labour

All forms of Modern Slavery involve the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain.

- 3.2 **Supplier** means a person who supplies goods or services to the Company (whether paid or unpaid) and any employees of the Supplier.
- 3.3 **Supply Chains** is defined as the products and services (including labour) that contribute to the Company's business. This includes products and services sourced in Australia or

overseas and extends beyond direct suppliers.

- 3.4 **Workers** refer to employees, directors, officers, agency workers, independent contractors and volunteers of the Company.

4 Supply Chains

- 4.1 The Company is committed to introducing anti-slavery obligations in all supplier contracts. As part of their contractual obligations, Suppliers will agree to undertake a process so the Company can understand the Supplier's ongoing commitment to eradicating Modern Slavery within its own business and those of its own suppliers.
- 4.2 In the event that Suppliers identify a risk of Modern Slavery within their own supply chains or operations, they are to notify the Company immediately and ensure they take practical steps to address the risk.
- 4.3 The Company expects that its Suppliers, at a minimum, shall:
- i. not use any type of forced labour, bonded labour (work which is not for compensation received by the worker, but to repay a debt), child labour (where the labour is performed by a person who is not at least the minimum legal working age in the country in question or, if no such minimum age exists in that country, in accordance with International Labour Organisation Convention 138), or indentured labour (in which an employer forbids workers from leaving employment at the worker's discretion);
 - ii. respect the freedom of their workers to leave employment at their own free will and not restrict their movement by controlling identity papers or holding money deposits;
 - iii. comply with the minimum legal working age in the jurisdiction in which they operate;
 - iv. comply with the National Employment Standards (**NES**) (if relates to employees in Australia) and minimum wage entitlements;
 - v. ensure working hours are as per the NES and overtime hours are not excessive and are compensated accordingly;
 - vi. provide a workplace for its workers free from harassment and discrimination;
 - vii. provide a safe and hygienic work environment; and
 - viii. treat migrant workers the same as local workers.

5 Company Due Diligence

- 5.1 The Company has a legal and morale obligation to eliminate Modern Slavery risks in its operations and Supply Chains.
- 5.2 The Company commits to:
- i. undertaking due diligence when engaging new Suppliers, independent contractors or any other third-party representatives by:
 - broadly assessing their supply chain to assess and evaluate risks of Modern Slavery and their control procedures in relation to ethical

sourcing;

- conducting audits or assessments where a general risk of Modern Slavery is identified; and
 - invoking sanctions when parties fail to remedy identified risks of Modern Slavery, including termination of the business relationship.
- ii. undertaking internal due diligence by continuously reviewing its internal systems and operations to ensure risks of Modern Slavery are eliminated. An important aspect of the Company's due diligence practice is to ensure this policy is kept up to date so that the policy is aligned with industry standards and legislative requirements regarding the eradication of Modern Slavery.

6 Management Responsibility

6.1 Managers are required to actively pursue the goals of this policy through the following approaches:

- i. ensure all Workers understand the purpose of this policy;
- ii. ensure adequate training in relation to this policy is provided to Workers; and
- iii. ensure Workers are trained to identify signs of Modern Slavery within the Company and throughout its Supply Chain.

7 Workers Responsibilities

7.1 All Workers have a responsibility to:

- i. comply with this policy;
- ii. monitor the working environment to ensure there are no risks of Modern Slavery;
- iii. immediately notify the Company if Modern Slavery risks are identified; and
- iv. seek further training to better understand the risks of Modern Slavery, if required.

8 Reporting Concerns

8.1 Workers who identify or suspect risks of Modern Slavery must report such concerns to Group Financial Controller on fredm@allam.com.au immediately.

8.2 The Company will then promptly review the concern and commence an investigation where necessary.

8.3 Workers who raise a complaint may choose to remain anonymous.

8.4 Workers who raise a complaint are protected from adverse action which includes actions which may cause a detriment or reprisal.

9 Continuous Improvement Approach

9.1 The Company is committed to applying a continuous improvement approach to how it reduces the risk of Modern Slavery practices within its Supply Chains and operations.

10 Breach of this policy

- 10.1 Any Worker who is found to have breached this policy may be subject to disciplinary action, up to and including termination of employment/services.
- 10.2 Where a Supplier is found to have breached this policy, the Company will cease its engagement with them until it is satisfied that the Supplier has become compliant with this policy.