



MODERN SLAVERY STATEMENT

FINANCIAL YEAR ENDING 30/06/2025



DECODE

Decode Group Pty Limited (ACN 611 188 339)

Level 8, 52 Alfred St, Milsons Point NSW 2061



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01

ABOUT US



This joint modern slavery statement for the year ending 30 June 2025 has been prepared by Decode Group Pty Limited (ACN 611 188 339) (DG) which is Australian proprietary company.

The registered office address for DG is Level 8, 52 Alfred Street, Milsons Point NSW 2061. The sole director of DG is Hussein El Rihani.

Since our founding in 2008, Decode has evolved into a leading tier 2 construction company in residential living NSW. With a diversified portfolio that covers the full spectrum of the construction industry, we are a team of passionate and innovative builders driven by a shared commitment to excellence.

At Decode we build partnerships. We understand that our clients' investments are more than just financial, they are a reflection of their dreams. Our unwavering commitment to our clients is why they come back to work with us time and time again.

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DECODE AT A
GLANCE

The Decode **Difference.**

Decode doesn't just build, we deliver our clients' vision. With a dynamic and diverse team based in Sydney, we're driven by innovation, commitment, and a mission to deliver excellence.

From commercial high-rises to educational institutions, we operate across the entire spectrum of the construction sector.

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

Excellence in construction is what we provide, but the experiences we create for communities are equally important.

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 Greater Sydney area and have expanded into the Newcastle region. DG own and control six wholly-owned subsidiary Australian entities, which also form part of the Decode corporate group.

During FY25, the Decode corporate group's workforce comprised approximately **170** employees, all situated in Australia.

Our operations in FY25 involved partnering with roughly **900** trade contractors and suppliers.

Our construction projects utilize materials supplied by a diverse group of Australian suppliers, such as reinforcing steel, concrete, windows, plumbing items, tiles, appliances, and flooring.



OUR SUPPLY CHAIN



During the FY25 reporting period, Decode engaged approx.900 subcontractors and suppliers across its construction projects.

Our supply chain consists of a diverse network of Australian-based suppliers and trade contractors who provide the materials, services, and labour required for our construction projects. We source materials and services through an extensive network of suppliers and subcontractors.

Despite our predominantly Australian supplier base, some materials used in our projects originate offshore. This includes indirect engagement with a manufacturer / supplier located in China, which may present additional modern slavery risks in the wider supply chain.



03

OUR STANCE
AGAINST
MODERN
SLAVERY

OUR APPROACH TO MODERN SLAVERY



OUR APPROACH TO MODERN SLAVERY

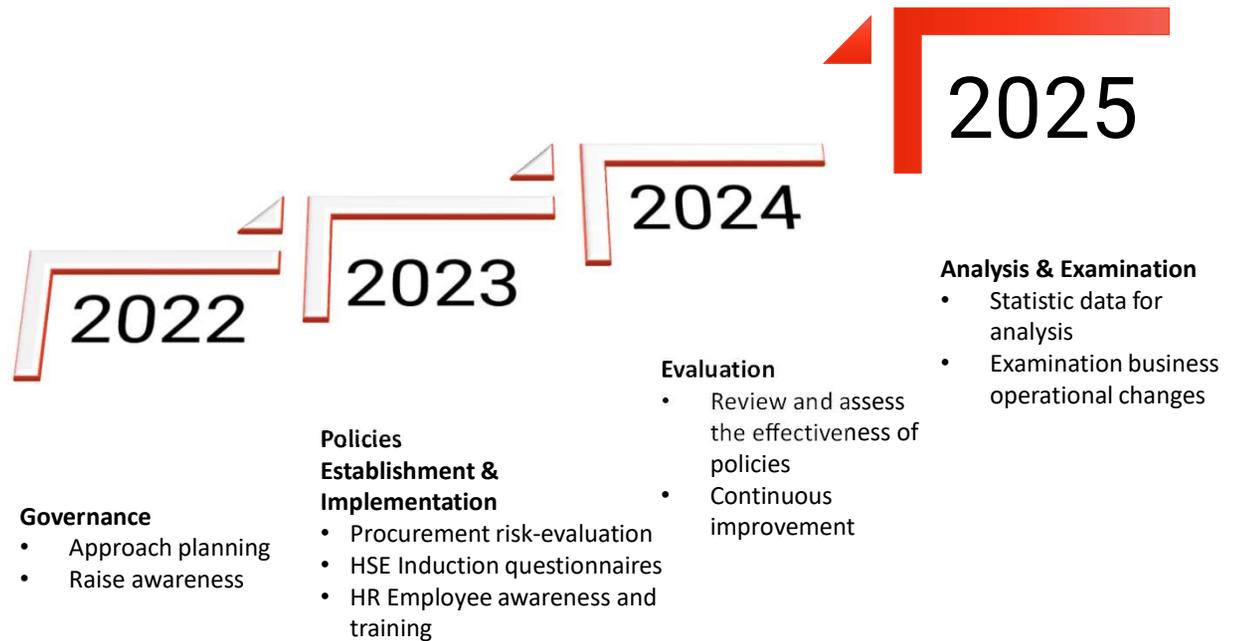
Decode remains committed to upholding human rights, including the absolute rights to freedom from forced labour, slavery and any form of degrading or inhuman treatment. In line with this commitment, we continue to review and strengthen our practices to minimise the risk of Modern Slavery across our operations and supply chain.

Our approach centres on embedding best practices across our operations, including continuous collaboration with suppliers and subcontractors to identify and address Modern Slavery risks. We maintain dedicated human resources function responsible for ensuring compliance with all relevant employment regulations and standards.

In addition, Decode is committed to implementing and maintaining robust systems and processes to raise awareness of Modern Slavery risks within our operations. Through ongoing engagement, training, and monitoring, we aim to ensure that all employees, suppliers, and subcontractors understand their obligations and actively support compliance with Australian and international Modern Slavery legislation.



OUR PROGRESS & COMMITMENT



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RISK
ASSESSMENT &
MITIGATION
APPROACH

RISK ASSESSMENT



We evaluate the potential risk of Modern Slavery within our business by identifying areas of concern and addressing them across both our direct operations and wider supply chain.

Although our internal operations present a lower level of risk, the nature of our industry means we may still face indirect exposure to Modern Slavery practices, such as human trafficking, forced labour, underpayment, or debt bondage, through our suppliers and subcontractors.

We continue to implement the following measures in order to mitigate the MS risk :

- Procure from licensed, established, and Australian suppliers.
- Short-listed qualified and preferred partners for suppliers / subcontractors.
- Limit direct engagement with overseas stakeholders lacking Modern Slavery transparency.
- Pre-qualification process and additional controls during contract awards.
- Conduct Modern Slavery checks and raise awareness during site inductions and business events
- Provide ongoing employee training to raise awareness of Modern Slavery risks.

Risk areas	Key risks
Labour Hire	Worker rights, fair pay, working conditions
Materials & Equipment	Health & safety, labour practices, supply chain governance
Overseas Procurement	Compliance, transparency, Modern Slavery risk exposure



ACTIONS TAKEN FOR THE REPORTING PERIOD

✓ ACTIONS TAKEN FOR THE REPORTING PERIOD

Goals	FY24 commitment
Documentation	Annual review of Modern Slavery documentation implemented to ensure alignment of our objectives and effectiveness of the measures we have implemented. Subsequently, we will provide further recommendations to “enhance” the awareness of Modern Slavery as part of subcontractor / supplier engagement.
KPI testing	Effectiveness of our measures <ul style="list-style-type: none"> Track and improve Supplier / Subcontractor questionnaires responsive rate analysis Track and measure site induction check-ins, to ensure all stakeholders attending our project sites are made aware of our Modern Slavery policy
Awareness & Training	Collaboration <ul style="list-style-type: none"> Engaging with staff, suppliers and subcontractors within our business to identify any stakeholders that may require training and support. Provide training to new employees coming into Decode and any staff members that marked NO in acknowledgement of MS policy
Reporting	New MS committee establishment: <ul style="list-style-type: none"> Quarterly meeting with head of procurement, HSE, HR to review compliance , review annual objectives. Follow up of action items and recommendations applicable.

Goals	FY25 completion
Documentation	<ul style="list-style-type: none"> MS clauses have been included in subcontractors / suppliers Pre-Qualification Questionnaires, Hammertech and Tender Minutes Integrated MS Policy in Employee Handbook Incorporated MS content in Site Induction Established a two-year review cycle for ongoing improvement of MS documentation review.
KPI testing	<ul style="list-style-type: none"> 94% of new subcontractors / suppliers gave a positive response on MS clauses in Prequalification Questionnaire Site induction have been recorded in Hammertech <ul style="list-style-type: none"> 91% are familiar with MS Legislation in Australia 92% understand compliance requirements and are aware of MS risks 94% understand their responsibilities to report any concerns related to MS risks
Awareness & Training	<ul style="list-style-type: none"> Subcontractors / suppliers are required to complete Hammertech questionnaire and site induction before commencing work on site. Site attendees who response with NO to questionnaires are being followed up by site PM/CA for education of MS policy implemented in business. MS Policy copies are available across site locations to reinforce awareness All new employees are required to read and acknowledge the MS Policy during induction Existing employees complete annual MS Policy acknowledgment. Unacknowledged are followed up and provided support of understanding the MS.
Reporting	<ul style="list-style-type: none"> Establishment of new MS committee is currently underway and will endeavour to form a committee in FY26



MITIGATION APPROACH

FY 26 Goals

- | | |
|----------------------|---|
| Documentation | <ul style="list-style-type: none">• To include the MS content in presentation materials used for networking events / boardroom lunches.• Introduce and expand a Modern Slavery due-diligence checklist for inspections / visits, applicable to international manufacturers and suppliers that are indirectly involved in our operations, where we have access to their sites or factories. |
| KPI testing | <ul style="list-style-type: none">• Track and improve the positive response rate for MS questionnaires to 100%.• Continuous education with any adverse responses by suppliers / subcontractors from MS questionnaires• Track and assess completion rate of MS due-diligence checklist for International site visits |
| Awareness & Training | <ul style="list-style-type: none">• Extend exposure : raise MS awareness at networking events for Trusted subcontractors / suppliers.• Extend exposure : Host on-site engagement events, such as BBQs, to strengthen understanding and encourage reporting of MS concerns.• Integrate MS interviews and observations into regular site inspections. |
| Reporting | <ul style="list-style-type: none">• Strengthen Governance and Accountability by establish a new MS Committee, including heads of Procurement, HSE, HR, and Finance.<ol style="list-style-type: none">I. To review annual goalsII. Timely updates to the MS Policy. (2 years review cycle)III. Periodically review feedback and discussion of potential areas of concernsIV. Brainstorming of other effective measures to implement within our business operations |



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ASSESSING
EFFECTIVENESS

ASSESSING EFFECTIVENESS & REVIEWING OUR SYSTEM

In FY25, we have focused on the examination the effectiveness and response to our implementation of the Modern Slavery policy. We are satisfied that we have provided great exposure of awareness of MS policy across the business improving our process & raising awareness in comparison to previous years. Moving forward, we are better equipped to more effectively assess and educate suppliers and subcontractors across our construction supply chain.

MS committee objectives

- Ensure 2 year cycle of reviewing the reporting and disclosure process to ensure Decode are following the prescribed process for capturing, reporting and disclosing identified MS risks as per our Modern Slavery policy.
- Review the effectiveness of the Pre-qualification and site induction questionnaires, to ensure they are being implemented consistently.
- Ensure follow ups are completed with the adverse responses from the questionnaires
- Ensure new and existing employees have read and acknowledged our MS Policy with ideally 100% completion at all times.



ASSESSING EFFECTIVENESS & GOALS

Over this reporting period, we evaluated 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 management and reporting.

With respect to each of these focus areas, we will continue to expand measures to areas within business operations and collect statistical data to assess the effectiveness of our actions in the next reporting period.

These include:

- Expand the MS awareness to international site visit / inspections
- Analyze the number of suppliers completing our Modern Slavery questionnaire and ensure timely follow up are applied to non-responsive suppliers and subcontractors ;
- The number of Modern Slavery cases identified and remediated. (if any)

Over future reporting periods, the MS Committee will continue to review and refine these KPIs and develop additional metrics to measure the effectiveness of our actions, supporting our commitment to continuous improvement and compliance as a business.



06

CONSULTATION
PROCESS WITH
ENTITIES OWNED
OR CONTROLLED
BY DECODE

CONSULTATION PROCESS

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

- During the current reporting period, relevant stakeholders (varies departments) are involved in our review and the establishment of this statement.
- Modern Slavery Policy and incident form was provided to all staff from all the entities controlled by Decode.
- We are confident that with MS committee's involvement, we will extend further engagement of the Modern Slavery Act 2018's reporting requirements with subsidiaries in the next reporting period. Such as information regarding the actions we intend to take to address these requirements and establishment of material during the process.
- Workshop with HR, procurement, legal, and project teams to discuss MS risks, current controls, and improvement opportunities will be introduced.
- The responsibility of the Modern Slavery objectives will rest with the MS committee who will engage, set expectations and ensure accountability of our KPI's across all entities of the group.



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APPROVAL

APPROVAL

This statement was approved by Hussein El Rihani,
sole director of Decode Group Pty Limited (ACN 611 188 339), on 11/12/2025.



Hussein El Rihani
Director of
Decode Group Pty Limited





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