



Modern Slavery Statement 2025

DCOH Pty Ltd

Reporting Period: 1 July 2024 to 30 June 2025

TABLE OF CONTENTS

Introduction	1
1. Reporting entity	1
2. Our structure, operations and supply chains.....	1
About DCOH.....	1
Our Mission	2
Our Values	2
Our People	3
Where We Operate.....	3
Our Supply Chain.....	4
Project examples.....	4
3. Modern Slavery Risk Assessment.....	5
Operational risk factors	5
Supply chain risk factors	5
Risk Heat Map	6
4. Due Diligence and Remediation	6
5. Measuring OUR Effectiveness	7
6. Future Commitments.....	7
7. Consultation & Approval.....	8

INTRODUCCION

This statement is made in accordance with section 16 of the **Modern Slavery Act 2018 (Cth)** and sets out the actions taken by **DCOH Pty Ltd** and its wholly owned subsidiaries to identify, assess and address modern slavery risks in our operations and supply chains for the financial year ending 30 June 2025.

1. REPORTING ENTITY

DCOH Pty Ltd is a privately owned Australian company incorporated on 23 May 2000 and headquartered in Darwin.

This statement covers DCOH Pty Ltd (ABN 95 092 987 463) and its wholly owned subsidiaries:

- ▀ DCOH Holdings Pty Ltd
- ▀ DCOH Land
- ▀ DCOH Services
- ▀ Textum Pty Ltd
- ▀ Thyme Hospitality including its wholly owned subsidiaries:
 - The Smith Hotel ABN 83 659 467 848
 - Frontier Hotel Pty Ltd ABN 45 659 406 863
 - Punters Bar Pty Ltd ABN 99 659 404 654
 - Atrium Hotel Darwin Pty Ltd ABN 59 659 405 231

2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

ABOUT DCOH

Founded in Darwin in 1987, DCOH Pty Ltd is a proudly Northern Territory owned company with more than three decades of local operation. Originating as a small roofing business, DCOH has evolved into a diversified, vertically integrated organisation operating across construction, development, hospitality and property services.

DCOH currently employs approximately 300 people, with more than 99 percent residing in the Northern Territory. Our workforce comprises permanent full time, part time and casual employees across project delivery, hospitality operations and corporate services.

Our success is founded on two core principles: our people and our integrity. We are deeply committed to supporting the Territory economy, developing local capability and maintaining strong, ethical relationships with our partners, suppliers and communities.

DCOH Pty Ltd and its wholly owned subsidiaries are committed to discussing issues that arise in relation to the Modern Slavery Statement and DCOH's compliance with the *Modern Slavery Act 2018* (Cth) at their board meetings.

DCOH operates across the following business streams:

- ▀ Property and land development
- ▀ Construction
- ▀ Roofing and cladding services
- ▀ Hospitality
- ▀ Real estate and property management

Our Mission

Building Better

For DCOH, building better means delivering beyond standards and expectations to create meaningful outcomes for our clients, our people and our communities. Through safe, disciplined and responsible action, we embrace innovation and new thinking, strengthen local capability, and contribute to the growth, resilience and future of the communities and regions in which we operate.

From the places we build to the services we deliver, every part of our business is an opportunity to strengthen communities and create lasting impact

Our Values

Ownership

We take ownership of our actions, decisions and outcomes, acting with integrity, authenticity and pride in the way we work and what we deliver.

Adaptability

We respond to change with agility, initiative and an open mind, continually evolving to improve how we build, operate and grow.

Diversity & Inclusion

As a diverse business by name and by nature, we value different people, perspectives, experiences and capabilities, and foster an inclusive culture that strengthens how we work, lead and deliver.

Guardianship

We protect what matters
— the safety of our people, our standards, our environment and our communities —
by meeting our responsibilities and continually lifting the standard of how we operate.

DCOH recognises the responsibility it has to affect change through its supply chain and procurement practices. Oversight of modern slavery risk sits with the Senior Management Team, led by Managing Director & CEO Shane Dignan. Accountability for implementation sits with senior operational leaders, procurement managers and project directors.

At DCOH, modern slavery risk management is embedded within our:

- Corporate governance frameworks
- Procurement and contracting processes
- Health, safety and wellbeing systems

OUR PEOPLE

People are central to DCOH's culture and performance. We strive to be an employer of choice in the Northern Territory by fostering a safe, inclusive and respectful workplace.

DCOH is an Equal Opportunity Employer. We value diversity and recognise the strength that different backgrounds, experiences and perspectives bring to our organisation.

We place strong emphasis on:

- Fair pay and lawful conditions
- Safe working environments
- Respectful workplace behaviour
- Career development and training

Strong relationships also extend to our subcontractors and consultants, many of whom are long term Territory businesses. Indigenous enterprises and employees are a key part of our workforce and project delivery model.

WHERE WE OPERATE

WE ARE THE NORTHERN TERRITORY'S MOST DIVERSE AND INTEGRATED BUSINESS, WITH A GROWING PRESENCE IN VICTORIA THAT STRENGTHENS OUR NATIONAL CAPABILITY AND BROADENS THE VALUE WE DELIVER ACROSS REGIONS.

OUR SUPPLY CHAIN

DCOH's supply chain comprises:

- ▀ Subcontract works
- ▀ Goods and services procurement
- ▀ Direct and indirect labour

Construction and development represent our largest procurement category. Subcontractors may supply both labour and materials, including prefabricated components manufactured interstate or internationally.

DCOH prioritises local procurement and has consistently achieved more than 92 percent local spend across major projects.

Project examples

Danala Education & Community Precinct

- ▀ More than 92 percent of subcontractors engaged were NT based
- ▀ Indigenous businesses engaged across civil works, landscaping and labour supply
- ▀ Regular site audits conducted by senior project staff

Robertson Barracks Defence Works

- ▀ Engagement of Defence compliant subcontractors
- ▀ Mandatory workforce right to work verification
- ▀ Strict compliance with Fair Work and Defence security requirements

Key procurement categories include:

- ▀ Construction materials
- ▀ Mechanical and electrical equipment
- ▀ Plant and equipment
- ▀ Hospitality supplies
- ▀ IT and professional services

3. MODERN SLAVERY RISK ASSESSMENT

DCOH has undertaken a risk assessment across its operations and supply chains using sector, product and geographic indicators. This process is critical to ensuring that our procurement and operational practices uphold the highest ethical standards.

Operational risk factors

Certain industries in which DCOH operates (such as construction, hospitality, cleaning and labour hire) present elevated risk due to:

- ▀ Subcontracted labour models which can create layers of employment relationships and reduce visibility over working conditions.
- ▀ Temporary and migrant workforce participation, where workers may face vulnerabilities such as limited rights awareness or dependency on employers for visas.
- ▀ Seasonal employment cycles which can lead to short-term contracts and increase risk of exploitation.
- ▀ Language and cultural barriers which may hinder workers' ability to report concerns or understand their rights.

Darwin's remote location and reliance on transient labour can further heighten these risks if robust controls are not in place. For example, workers sourced through interstate or overseas labour hire agencies may be at greater risk of underpayment or unsafe conditions without stringent verification processes.

Supply chain risk factors

Materials commonly used in construction and hospitality are potentially linked to higher risk regions include:

- ▀ Steel and metal products
- ▀ Solar panels
- ▀ Tiles, glass and ceramics
- ▀ Timber and stone
- ▀ Curtain wall façade

These categories have been associated with risks such as forced labour, child labour, excessive working hours and unsafe conditions. DCOH recognises exposure may occur through second and third tier suppliers where visibility and control are more challenging.

RISK HEAT MAP

To prioritise our mitigation efforts, we have assessed likelihood and impact across key risk areas:

Risk Area	Likelihood	Impact	Rating
Subcontract labour	Medium	High	High
Labour hire providers	Medium	High	High
Imported construction materials	Medium	Medium	Medium
Hospitality supply chain	Low	Medium	Low
Direct employment	Low	High	Low

DCOH will conduct a comprehensive review of modern slavery risks across its operations and supply chains each year to ensure responsible procurement and ethical sourcing practices. This process will include reassessing risk indicators, updating our risk heat map, and incorporating any changes in supplier profiles, geographic exposure, or industry trends. Results will be reported to the Board and used to refine mitigation strategies, strengthen contractual obligations, and enhance supplier engagement processes.

DCOH confirms that no incidents of modern slavery were identified or reported during the FY2025 period.

4. DUE DILIGENCE AND REMEDIATION

DCOH undertakes necessary due diligence when considering taking on new suppliers and completes reviews of its existing suppliers. Our controls include:

- Contract clauses mandating award compliance.
- Right to audit provisions within supplier contracts.
- Preference for Australian suppliers.
- Site based oversight by project teams.
- Anonymous reporting pathways for staff and stakeholders.

DCOH encourages employees, contractors and suppliers to report any concerns about modern slavery through our confidential reporting channels. Reports can be made anonymously and DCOH approaches these reports in a serious manner and investigates promptly.

Where DCOH identifies potential modern slavery risks, DCOH will engage with the relevant party to understand the issue and determine appropriate corrective actions proportionate to the risk.

In the event DCOH becomes aware of modern slavery risk in its operations, we expeditiously take all relevant steps to remove and/or reduce risk including:

- Supplier engagement and corrective action plans are implemented.
- Matters are escalated to senior management.
- Contracts are terminated where remediation fails.

DCOH's remediation processes demonstrates our commitment to managing any potential ethical issues in an appropriate manner and consistent with our values.

5. MEASURING OUR EFFECTIVENESS

DCOH recognises the importance of monitoring and assessing actions that have been implemented to uphold their strict ethical and integrity standards. Effectiveness is monitored through the following actions, consistent with the Attorney-General's Department guidance:

- Supplier compliance reviews, site audits.
- Tracking completion rates for modern slavery awareness training. DCOH is focused on internal training to improve awareness and knowledge amongst our team members.
- Monitoring and resolving reported concerns.
- Annual board review of risk assessment outcomes and improvement actions.

6. FUTURE COMMITMENTS

DCOH is committed to ongoing improvement and aims to implement the following future measures in the next financial year:

- Implementation of DCOH's Modern Slavery Policy, setting clear expectations for employees and suppliers.
- Delivered modern slavery awareness training to senior leadership to ensure consistent oversight across our business operations.
- Strengthened subcontractor onboarding checks to assess risk levels.
- Ongoing verification of labour hire compliance.
- Reinforced clear reporting pathways across all sites and encouraged anonymous reporting of concerns.
- Formal rollout of Supplier Code of Conduct to set out the ethical standards expected of our suppliers (and which will be aligned with modern slavery principals).
- Mandatory completion of modern slavery questionnaires for all new suppliers (which will allow DCOH to understand potential risks and what measures suppliers have implemented from a policy, process, structure and governance point of view).
- Targeted audits of suppliers in high-risk categories.
- Expanded training for procurement and site teams

- Review and improvement of modern slavery terms in subcontract contracts to strengthen compliance obligations.
- Undertake annual risk assessment reviews

DCOH requires all contractors, subcontractors and suppliers to comply with the *Modern Slavery Act 2018 (Cth)* and to take proactive steps to identify and address modern slavery risks within their own operations and supply chains.

As part of our procurement process, we will:

- include modern slavery compliance clauses in all new supply and subcontract agreements.
- require suppliers to confirm they have policies and procedures to assess and mitigate modern slavery risks.
- Reserve the right to audit suppliers and terminate engagement with suppliers who demonstrate non-compliance with modern slavery requirements.

7. CONSULTATION & APPROVAL

This statement is issued in accordance with the *Modern Slavery Act 2018 (Cth)*.

This statement was developed with the input of senior management and key employees of the entities listed under the "Governance & Structure" section. Subsidiaries were consulted to ensure alignment of policies and practices.

Approved by the Board of DCOH Pty Ltd on 4 February 2026.

A handwritten signature in black ink, appearing to read 'Shane Dignan', with a long horizontal stroke extending to the right.

Shane Dignan
Managing Director &
Chief Executive Officer

DCOH Pty Ltd | Modern Slavery Statement 2025