



**Modern Slavery
Statement | 2025**

Edgarange Pty Ltd



Modern Slavery Statement

FY2025

Introduction

Modern slavery is a term used to describe practices where coercion, forced labour, threats or deception, forced marriage, debt bondage, extreme forms of child labour and human trafficking are used to exploit victims, and undermine and deprive them of their freedom.

The United Nations (UN) have estimated that approximately 50 million people worldwide were victims of modern slavery in 2021, an increase of 10 million people since 2018. Modern slavery can occur in every industry and sector, with the property and construction industry identified as high risk.

Edgarange Pty Ltd is a reporting entity under the Modern Slavery Act 2018 (Cth) (**Modern Slavery Act**) and has prepared this Statement for the July 2024 – June 2025 reporting period. This Statement was prepared in consideration of the requirements of the Modern Slavery Act, utilising the Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities (May 2023), in addition to further guidance, information, and updates provided by the Attorney-General's Department.

Edgarange Pty Ltd is committed to operating lawfully, ethically and transparently, including respect for human rights, as we seek to continuously improve our processes for identifying and addressing modern slavery risks within our supply chains. We work with trusted contractors, partners and suppliers who are aligned with our core values.

Mandatory Reporting Criteria

1 Identify

Identify the reporting entity

2 Structure, Operations and Supply Chains

Describe the reporting entity's structure, operations and supply chains

3 Risk of Modern Slavery Practices

Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

4 Actions Taken

Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

5 Effectiveness

Describe how the reporting entity assesses the effectiveness of these actions

6 Process of Consultation

Describe the process of consultation with any entities the reporting entity owns or controls

7 Other Information

Provide any other relevant information

1 Identify the Entity

This statement is prepared for Edgarange Pty Ltd and its fully owned subsidiary WPVP Pty Ltd.

Edgarange Pty Ltd
ACN: 010 272 849

WPVP Pty Ltd
ACN: 676 019 604

Registered Office
'King George Central'
Level 18, 145 Ann Street
Brisbane QLD 4000

2 Structure, Operations and Supply Chains

Structure

Edgarange Pty Ltd is an Australian, privately owned family business. It is owned by a single shareholder and managed by two directors.

WPVP Pty Ltd is an Australian, fully owned subsidiary of Edgarange Pty Ltd.

They report as a 'single reporting entity'

Edgarange Pty Ltd shares ownership with several other companies, the most notable being Sutgold Pty Ltd whom Edgarange contracts to provide civil development and residential home construction. Sutgold Pty Ltd is not consolidated for reporting purposes, however, it shares common ownership and directors as Edgarange Pty Ltd. Where this statement refers to 'the Group', it refers to Edgarange Pty Ltd and WPVP Pty Ltd, while separately considering Sutgold Pty Ltd as a related-party supplier that materially contributes to the Group's supply chain risk profile.

Operations

Edgarange is a land-owning entity. It acquires and holds parcels of land for development into residential communities within the Redlands region of Southeast Queensland.

WPVP Pty Ltd holds 1 commercial property asset.

Edgarange directly employs 5 staff in permanent full-time capacity and engages a range of subcontractors, suppliers and consultants, generally through Sutgold Pty Ltd. These companies are best known in the local community as 'Fiteni' and have been in operation for over 45 years.

Supply Chains

Fiteni pride ourselves on establishing long term supplier and subcontractor relationships, primarily in the local area of Brisbane. In alignment with our standard engagement processes, all subcontractors and suppliers are required to provide Fiteni with site compliance and insurance documentation.

In the 2024/2025 reporting year the Group procured goods and services from Australian based suppliers and subcontractors, including:

- Civil construction works including demolition and earthworks
- Trade services including bricklayers, carpenters, electricians and tilers
- Construction materials including steel, concrete and timber
- Professional services including accounting and legal
- Office supplies, IT and maintenance

The commercial property owned by WPVP is managed by a well-respected commercial real estate agent at arm's length who coordinates tenant communications, maintenance, and repairs for the building.

Whilst the Group has no evidence to suggest that any products or services procured are subject to modern slavery, we identify that there is a risk. We will continue to educate, advocate and collaborate within our supply chains, with the intention of creating more transparency and responding appropriately to modern slavery risks.

Vision & Mission

Fiteni are here to enrich communities by creating beautiful places for people to live, grow and explore.

Our ambition is to build homes and communities that help our customers realise their dreams.

We are committed to delivering high quality experiences, peace of mind, and memories that endure.

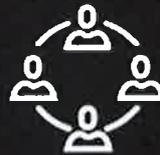
Fiteni Values



We deliver **QUALITY**



We **RESPECT** each other



We work as a **TEAM**



We **INNOVATE** and evolve



We are **LOYAL**



We act with **INTEGRITY**

3 Risk of Modern Slavery Practices

The risk of modern slavery practices within our group was evaluated based on the potential for our most utilised operations and supply chains to cause, contribute to, or be directly connected to modern slavery.

A summary of our findings is as follows.

Type of modern slavery risk	Risk level
<p>Direct employment of staff Our staff are all located within Australia with permanent rights to work All staff are paid at or above Industry Awards, with pay reviews completed at least annually. Employee onboarding process includes training on internal policies via hosted online platform No labour hire agencies are used</p>	<p>Nil</p>
<p>Tier 1 Goods and Services directly purchased are limited primarily to advertising and professional services, which are assessed as low risk. The largest overall proportion of expenditure is to related entity Sutgold Pty Ltd. Consequently, we have progressed to the next tier of the supply chain.</p>	<p>Very Low</p>
<p>Tier 2 Subcontractors – Over 34% of expenditure was to entities reporting on modern day slavery in their own right Suppliers – Over 38% of expenditure was to entities reporting on modern day slavery in their own right The majority of remaining suppliers and subcontractors are local businesses with known workforce.</p>	<p>Low</p>
<p>Tier 3 Materials and Products – Visibility at this level has presented a challenge and we acknowledge that there is an increased risk of modern slavery further down our supply chain particularly in sourcing materials such as timber, steel, plastic, glass, cement, hardware, metals, tiles, brick and sand.</p>	<p>Medium</p>

4 Actions Taken

Summary of our approach

Key staff and Director Awareness – Key staff undertook research and awareness training in relation to modern slavery and commenced investigation into our supply chains.

Whistleblower Policy - Fiteni Group is committed to always conducting its business with honest and integrity. The whistleblower policy has been implemented to foster a transparent whistleblower culture, and protecting eligible whistleblowers in making disclosures without suffering detriment. This policy is completed on induction of a new staff member, and annually for all staff via our online training hub.

Code of Conduct – Outlines the values, rules, standards and principles of the Group. This policy is completed on induction of a new staff member, and annually for all staff via our online training hub.

Diversity, Equity & Inclusion Policy – Fiteni Group is committed to developing a rich culture, a diverse workforce, and a healthy work environment in which every employee is treated fairly and is respected. This policy is completed on induction of a new staff member, and annually for all staff via our online training hub.

Work, Health, Safety and Wellbeing – Fiteni is committed to ensuring a safe working environment for all staff. Regular third party site audits are undertaken to ensure safe working practices and conditions, Safe Work Method Statements are produced and signed as well as regular tool box talks for site staff.

Employee Assistance Program (EAP) – Fiteni offers a confidential service for employees to access professional and confidential psychological support through an external psychologist with the goal of providing a safe, supportive space to navigate difficult situations, enhance wellbeing, and improve overall mental health.

Our Action Commitments

Training for all staff - Modern slavery policy and awareness training on induction of new staff, and ongoing annual training for all staff via our online training hub

Update Policies – Enhance the existing policy portfolio by incorporating information regarding modern slavery, and our zero tolerance position in relation to modern slavery within our supply chains.

Supplier Questionnaires – Roll out supplier questionnaires to our Tier 1 and Tier 2 suppliers with the largest contract values, and additionally, any other suppliers or subcontractors that have been identified as posing a higher risk of modern slavery practices within their supply chains.

5 Effectiveness

During this initial reporting period, our focus was to gain a better understanding of our modern slavery risks and how they may exist in our supply chains.

While we take steps to address modern slavery risks in our operations and supply chains, we will identify appropriate indicators to measure effectiveness at regular intervals and establish a measurement framework for future reporting periods.

Additionally, WPVP will look to manage the commercial asset within the next reporting period. As part of our work processes, a Supplier Code of Conduct will be issued to all suppliers / contractors.

The Supplier code of conduct will specifically note that the contractor must:

- Not engage in modern slavery
- Comply with all laws, codes and standards, regulations, legal requirements, and directions relating to modern slavery
- Notify the Group promptly upon becoming aware of any compliant or allegation that the contractor has engaged in modern slavery

6 Process of Consultation

During the preparation of this statement, we engaged with the appropriate personnel across each entity we own, control, or are related to, in order to ensure all areas of our business operations reflect our ongoing commitment to eliminating Modern Slavery.

The Group operates under the same policies and procedures and the same consistent approach applies to Modern Slavery.

7 Other Information

There is no further relevant information to report.

Approval

This Statement was approved and signed by David Killer in his role as Director of Edgarange Pty Ltd on 18 December 2025.



David Killer

Chief Executive Officer

18 December 2025