



Modern Slavery Report

Dennis Family Holdings Pty Ltd
ACN 097 641 855

Report for the period 1 July 2024 to 30 June 2025



Introduction

Dennis Family Holdings Pty Ltd (the “Company” or “DFH”) 2025 Modern Slavery Report (the “Report”) sets out the actions taken by the Company including its subsidiaries and relevant related/associated entities, to understand, mitigate, and address modern slavery risks related to its business for the financial year 1 July 2024 to 30 June 2025 (FY25). The Report is publicly available on the Company’s website at: www.denniscorp.com.au

The Modern Slavery Act 2018 (Cth) provides the following definition: 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 human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, and the worst forms of child labour. Modern slavery is a term used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers.

During FY25, the Company continued to focus on Modern Slavery through embedding of its Enterprise Risk Management Framework with updated risk management reviews and reporting across the group to the Audit and Risk Management Committee and the Company’s Board.

This Report has been approved by the Company’s Board and the process of consultation with subsidiary entities in preparing this Report has included the directors of those entities reviewing the Report and being consulted on its contents. Additionally, executives from each of the Company’s businesses were engaged in the development of this Report.



About the Company

The Company's operations changed significantly during FY25, with the sale of its home building business to an external party. The Company's operations are therefore significantly reduced in scale and scope with the remaining business comprising a far more limited supply chain and narrower contractor base.

Land Developments

The land development business is managed by a related party, Dennis Family Corporation, who project manage residential community developments across Melbourne, parts of regional Victoria and South-East Queensland.

The business aims to create inclusive residential community developments where residents can enjoy an active lifestyle. Our project management team have extensive industry knowledge, that combined with strong networks within the property development and housing industries, enables us to work effectively with government, authorities and the community to create state-of-the-art surroundings for residents.



Procurement

DFH procures from both direct and indirect suppliers. Direct suppliers include those from whom the Company engages to undertake civil construction, landscaping and other building works. Indirect suppliers include those from whom the Company buys services, including marketing, legal, corporate and consulting services. DFH has consulted with its major contractors and suppliers and made a modern slavery risk assessment through the procurement process. The Company typically has long-standing relationships with its key contractors and service providers and engages closely with senior management at these entities to ensure it remains closely informed on their operations.

Further details on the Company's trading names, operating structure and joint ventures are outlined in Appendix 1 to this Report.

Procurement Manual

The Company's "Policy for Contracting of Consultants and Contractors" sets out DFH's expectations for the procurement process and that suppliers engaged conduct their business with a high level of ethical and moral standards.

In FY25, there has been no supplier termination for breaching expectations of DFH's procurement manual.



Wellbeing Support Program

DFH employees have access to a complimentary Wellbeing Support Program which provides a range of services and support. It is voluntary, confidential and easy to access, with support available for personal and work-related issues including performance, dealing with grief, and stress management.

Human Resource Assistance

The Company's Human Resources (HR) shared service operation is the first point of contact for all general HR queries and support DFH has a centralised team assisting all business units.

Pay equity review

On an annual basis, a pay equity review is undertaken to ensure that remuneration decisions are fair, competitive, market-relative, and reflective of performance. This process is underpinned by DFH's remuneration policies.

Labour hire providers

DFH rarely uses contract labour hire, and when it does, it has practices and agreements in place to ensure that it only uses reputable employment agencies to source contract labour within Australia.

Due Diligence

The Company's commitment to the prevention of modern slavery is underpinned by its policies and programs, including risk assessment processes that are designed to identify impacts and adopt preventative measures.

These policies and programs are being continually reinforced within the Company and several have been enhanced to improve their effectiveness.



Code of Conduct

The Code of Conduct is a core policy that outlines the Company's expectation that employees conduct themselves and their business at the highest standards and behave in an ethical and responsible manner.

Failure to abide by DFH's Code of Conduct may constitute a disciplinary offence and can result in termination of employment.

No matters of non-compliance with the Code of Conduct relating to modern slavery or human trafficking have been reported during FY25.

Speak Up Policy (Whistleblower)

DFH's Whistleblower Policy has been adopted to ensure that people can raise concerns regarding actual or suspected contravention of DFH's standards or the law without fear of reprisal or feeling threatened by doing so. The Policy is supported by a confidential Whistleblower service and operates across DFH's operations.

Any matters raised under the Whistleblower Policy are also reported to the Company through the Audit and Risk Management Committee. The Company is informed of any material incidents raised for the purposes of maintaining good corporate governance and oversight of DFH's culture. Any issues are resolved by way of investigation and action as required.

The Company's Whistleblower Policy aligns with Australian Whistleblower legislation.

No matters of non-compliance with the Whistleblower policy have been reported during FY25.

Workplace Health, Safety and Wellbeing Policies

Various Workplace Health, Safety and Wellbeing policies set out DFH's commitment to achieving an incident and injury free workplace. The Board has established a dedicated Health and Safety Steering Group which meets monthly and oversees all aspects of the Company's health and safety practices, processes and governance.



Enterprise Risk Management Framework and Risk Management Policy

To oversee and manage risk, the Company and its Audit and Risk Management Committee have adopted an updated Risk Management Policy and an Enterprise Risk Management Framework in 2022, both of which are reviewed annually. The Risk Management Policy provides guidance and direction on the management of risk related to the Company and states our commitment to the effective management of risk to reduce uncertainty in the Company's business outcomes.

In 2025, updated Risk Profiles were prepared across the group and include relevant environmental, social and governance aspects. This focus includes risks relating to a range of Environmental and Social Governance topics, including health and safety, discrimination, diversity and inclusion, privacy, cybersecurity and modern slavery.

Assessing effectiveness

DFH will continue to develop and modify its approach as required to ensure that it meets its commitments and upholds the highest ethical standards.

The Board's responsibilities include actively promoting ethical and responsible decision-making within DFH.

The Audit & Risk Management Committee assists the Board in overseeing the processes to monitor and ensure compliance with laws, regulations, ethical guidelines and other requirements.

Training & Communication

Employees are one of DFH's most important assets. DFH ensures all senior leaders and employees are aware of and understand the policies which reflect the Company's commitment to promote ethical and responsible behaviour and prevent modern slavery and human rights breaches within its operations.

All new employees complete training covering the Company's Code of Conduct, Whistleblower policy and other relevant policies and programs within the first three months of their employment. Thereafter, all employees complete these modules every two years.



Looking ahead

DFH is committed to continuously improving the practices, procedures and relevant education related to modern slavery to support its prevention.

The Company will continue its focus on rolling out communication and awareness with respect to modern slavery legislative requirements.

During FY26, DFH will:

- Progress its work program on modern slavery including consideration of modern slavery risks in its supply chain; this includes working with major suppliers and contractors to develop the recommended actions for reducing their modern slavery risks.
- Continue to evolve its enterprise risk management framework and risk profiles including focus on modern slavery risk management.
- Introduce and educate its staff in a new Fraud and Corruption Framework to be implemented across the Company.



William J. Stevens, Chairman

Appendix 1

DFC (Services) Pty Ltd

Dennis Family Holdings Pty Ltd