

Modern Slavery Statement

Financial Year 2024

— Introduction

This Modern Slavery Statement has been published in accordance with the *Commonwealth Modern Slavery Act 2018* (**the Act**).

This statement outlines the measures undertaken by Star Group Holdings Pty Ltd ABN 93 000 452 924 (**Star Group**) during the Australian 2024 Financial Year to prevent modern slavery within its organisation and supply chains. Star Group, together with its subsidiaries, has a zero-tolerance approach towards all types of human rights violations, including modern slavery. Star Group is dedicated to playing a key role in creating a sustainable future for the industries and communities it serves.

Among the economic, environmental, and social aspects of our Code of Conduct, Environmental and Anti-Slavery Policies, we value Human Rights as an essential building block. Working with global supply chains presents a challenge, but we are committed to developing effective solutions.

In the Australian 2024 financial year, we thoroughly reviewed our management system and created a digital transformation roadmap, including improvements to our supply chain and ESG management processes. Star Group regularly reviews its policies and carries out necessary due diligence to ensure compliance with regulations.

— Governance Structure

Star Group Holdings Pty Ltd is the parent holding company, and it 100% owns the following five subsidiary entities:

- Star Electrical Co Pty Ltd
- Solar Electric and Engineering Supplies Pty Ltd
- Elect Energy Pty Ltd
- Q-Star Co Pty Ltd; and
- Star Electrical Lanka (Pvt) Ltd.

This Modern Slavery Statement covers all entities under the parent company's control.

— Our Business & Operations

Star Group is a privately owned electrical, communications, and maintenance contractor with over 400 employees specialising in electrical, data and communications, high voltage, audio-visual, engineering, and wholesale services. We provide services to various sectors such as commercial, health, transport, utilities, defence, digital infrastructure and education.

Star Group operates mainly in New South Wales and the Australian Capital Territory of Australia. It also has a registered company in Sri Lanka that provides professional and administrative support services to Star Group's Australian operations from an office in Colombo.

The following key information relates to our organisation's operations:



Operating in **2** countries globally, Australia & Sri Lanka



Employing **362** employees and **87** apprentices/trainees



Working with over **700** direct suppliers within the Australian operations



Serving over **500** clients within the Australian operations

— Supply Chain

Our supply chain includes a mix of major global brands and offshore suppliers, as well as Australian-based suppliers and sub-contractors. The main types of goods and services procured include:

- Electrical equipment and materials (switchboards, transformers, cables, conduit, switches etc.).
- Tools, plant and equipment.
- Uniforms and personal protective equipment (PPE), including safety devices and equipment.
- Audio visual, communications and data equipment and software
- Office stationery, consumables and equipment.
- Specialist subcontractors and supplementary labour hire companies who perform work for us on our projects.
- IT equipment, software and cloud-based data storage.

— Key Focus Areas

In 2024, Star Group did not identify any significant risks of modern slavery in its operations and supply chain. However, Star Group has commenced conversations with third-party ESG services partners to simplify our ESG risk management and lead our organisation's success through their intuitive platform to easily report on progress in line with

emerging standards. Exploring this partnership to ensure our monitoring of modern slavery risks continues.

Star Group's operations continue to be based mainly in Australia, where it follows Australian Human Rights legislation and the Commonwealth's guidance and recommendations.

Some employees continue working in our Sri Lanka office, which, given the current political climate, adds uncertainty and added responsibility to ensure their safety and well-being. Star Group continues to communicate regularly with the Sri Lanka office to provide guidance.

Star Group has transparent, best practice and legally compliant recruitment processes and sources supplementary labour from local licenced labour hire entities.

Direct suppliers and subcontractors must comply with all applicable laws, including Star Group's ethical and sustainability policies and applicable local legislation. This compliance is achieved through our continuously improving procurement process.

In 2024, Star Group reinforced the promotion of the Anti-Slavery Policy with its suppliers during the procurement process. We commenced re-designing a new procedure for the Qualification and Evaluation of suppliers to reinforce the adoption of ESG requirements in our supply chain. However, the implementation of this process is still in progress.

Star Group is also developing a new supplier code of conduct and seeks to publish the document in the Australian Financial Year 2025. This supplier code of conduct will promote ESG principles throughout our supply chain and reinforce the importance of eliminating modern slavery.

— Due Diligence Measures

As in the previous years, Star Group continues to incorporate measures to reduce the risk of Modern Slavery in its business, as follows:

- Social requirements are integrated into policies, supply chain pre-qualification process and existing contractual agreements.
- Our recruitment processes are designed to prohibit the occurrence of Modern Slavery.
- Modern Slavery legislation is part of the required commitments from all Star Group suppliers.

— Performance Indicators

Star Group continues to monitor human rights through pre-qualification and reporting processes covering issues such as discrimination, child labour, forced labour, freedom of association, safety, and diversity. Star Group is moving towards developing indicators related to social indicators to report in the Quarterly and Annual Reports. Collaboration and partnership with third-party ESG services partners are being considered to assist and strengthen this reporting through their advanced technology.

Since 2021, COVID-19 has caused significant global supply chain issues, which were still felt in 2024. Many of Star Group's projects and contracts were impacted in some form. These issues, such as product demands, inflated costs and shipping delays, caused compliance challenges with obligations such as construction programs, which inherently extended payment time frames with suppliers due to delayed deliveries, which Star Group recognised can constitute an added social risk. Most of these issues were

outside of the reasonable control of Star Group. However, these supply chain pressures significantly eased throughout the 2024 year.

— Training & Awareness

Star Group is implementing a new digital learning platform to provide many training opportunities. This implementation will continue in 2025.

Star Group seeks to offer more content regarding human rights for all employees and train new employees on topics related to its code of conduct and ESG principles outlined in its policies.

— FY25 Plans

For 2025, Star Group plans to:

- Fully implement the integration of social indicators for the qualification and evaluation of suppliers
- Develop a supplier code of conduct
- Implement the new procurement process to combat modern slavery and support human rights in project management risk assessment and safety processes
- Confirm the suitability of the Fair Supply partnership to support Star Group's Risk Framework concerning human rights and the mitigation measures to address the risk of modern slavery; and
- Offer all Star Group's workforce more training programs regarding human rights through a new digital learning platform.

— Consultation Process

The signatories to this statement form part of several consultative committees, including Star Group's

Diversity and Inclusion and Health and Safety Committees, where the risks and measures outlined in this statement are consulted.

— Approval

The Star Group Board approved this statement on 24 September 2024.

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