STAR group 65 years 1957-2022

Modern Slavery Statement

Financial Year 2025

— Introduction

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

This statement outlines the actions taken by Star Group Holdings Pty Ltd ABN 93 000 452 924 (**Star Group**) during the Australian 2025 financial year to identify, assess, and address modern slavery risks within its operations and supply chains. Star Group, together with its subsidiaries, has zero tolerance for all forms of human rights abuse, including modern slavery, and is committed to contributing to a more sustainable future for the industries and communities in which it operates.

Human rights are a core component of our Code of Conduct, Recruitment Policy, Environmental Policy, and Anti-Slavery Policy. We recognise that managing modern slavery risk across global supply chains can be complex, and we are committed to continuously strengthening our approach.

During the Australian 2025 financial year, we continued reviewing our management system and progressing our digital transformation roadmap, including improvements to supply chain oversight and ESG management processes. Star Group continues to review its policies regularly and undertake due diligence activities to support compliance with applicable laws and standards.

— Governance Structure

Star Group Holdings Pty Ltd is the parent company and wholly 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 applies to all entities under the control of the parent company.

— Our Business & Operations

Star Group is a privately owned electrical, communications, and maintenance contractor employing more than 500 people across electrical, data and communications, high voltage, audio-visual, engineering, and wholesale services.

We operate across a range of sectors, including commercial, health, transport, government, utilities, defence, digital infrastructure, and education.

Star Group operates primarily in New South Wales and the Australian Capital Territory. 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.

Key information about our operations is set out below:

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

Employing **462** employees and **152** apprentices/trainees

Working with over **1,324** direct suppliers within the Australian operations

Serving over **602** clients within the Australian operations

Supply Chain

Our supply chain includes major global brands and offshore suppliers, as well as Australian-based suppliers and subcontractors. The primary goods and services we procure 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 2025, Star Group did not identify any significant modern slavery risks within its operations or supply chain. However, we continued exploring third-party ESG service providers to strengthen ESG risk management and improve our ability to monitor, report on, and respond to emerging standards and risks, including modern slavery.

Star Group's operations remain primarily based in Australia, where we operate in accordance with Australian human rights legislation and relevant Commonwealth guidance and recommendations.

Several employees continue to work from our Sri Lanka office. Given the broader political and economic environment, this requires ongoing oversight and care to support their safety and wellbeing. Star Group continues to maintain regular communication with the Sri Lanka office and provide appropriate guidance and support.

Star Group maintains transparent, lawful, and best-practice recruitment processes and sources supplementary labour through local licensed labour hire providers.

Direct suppliers and subcontractors are expected to comply with all applicable laws, Star Group's ethical and sustainability policies, and relevant local legislation. These expectations are reinforced through our evolving procurement processes.

During 2025, Star Group continued to promote its Anti-Slavery Policy to suppliers as part of the procurement process. We also progressed the redesign of our supplier qualification and evaluation procedure to strengthen the integration of ESG requirements across the supply chain. Implementation of this updated process remains underway.

Star Group is also developing a Supplier Code of Conduct, with publication targeted for the Australian 2026 financial year. This document is intended to promote ESG principles throughout our supply chain and reinforce our expectations regarding the prevention of modern slavery.

Due Diligence Measures

As in previous years, Star Group continues to implement measures designed to reduce the risk of modern slavery across its business, including:

- Integrating social requirements into policies, supply chain pre-qualification processes, and existing contractual arrangements.
- Applying recruitment processes designed to prevent modern slavery and related labour exploitation risks.
- Requiring Star Group suppliers to acknowledge and meet commitments under modern slavery legislation.

Performance Indicators

Star Group continues to monitor human rights issues through pre-qualification and reporting processes that cover matters such as discrimination, child labour, forced labour, freedom of association, safety, and diversity. We are also working toward developing more defined social indicators for inclusion in quarterly and annual reporting. Engagement with third-party ESG service providers is being considered to help strengthen this reporting capability.

Global supply chain disruption arising from war in the middle east related delays continued to affect some projects and contracts during 2025, although conditions improved over the course of the year. Product shortages, increased costs, and shipping delays created operational and compliance challenges, including delays to construction programs and extended payment timeframes linked to late deliveries. Star Group recognises that these pressures can increase social risk within supply chains, even where the underlying causes are outside its reasonable control.

Training & Awareness

Star Group is implementing a new digital learning platform to expand access to training across the business, with implementation continuing throughout 2025.

Star Group intends to provide additional human rights content for employees and to strengthen induction and ongoing training on the Code of Conduct and ESG principles reflected in its policies.

FY26 Plans

In 2026, Star Group plans to:

- Fully implement the integration of social indicators into supplier qualification and evaluation processes.
- Continue to develop and publish a Supplier Code of Conduct.
- Implement the updated procurement process to strengthen controls addressing modern slavery and human rights risks within project management, risk assessment, and safety processes.
- Assess the suitability of technology to support Star Group's risk framework, including human rights risk monitoring and mitigation measures.
- Expand training opportunities for the Star Group workforce on human rights through the new digital learning platform.

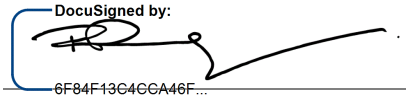
Consultation Process

The signatories to this statement participate in several consultative committees, including Star Group's Diversity and Inclusion Committee and Health and Safety Committee, through which the risks and measures described in this statement are considered and discussed.

Approval

The Star Group Board approved this statement.

John Andrews
Group CEO and Executive Director, Star Group Holdings



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