



Modern Slavery

Overview

This policy outlines how we intend to comply with our obligations and improve our awareness of our supply chains and in doing so, assess, address and report on the risks of modern slavery within our operations and supply chains.

Scope

This policy applies to St George Community Housing and its subsidiaries (we, our and us).

Purpose

This purpose of this policy is to:

- Make sure we comply with the *Modern Slavery Act 2018 (Cth) (MSA)*.
- Outline our commitment to continually look for, assess, address and report on the risks of modern slavery within our operations and supply chains.
- Support our compliance with relevant laws by having appropriate policies, procedures, and guidelines.

Modern slavery

The term modern slavery is used to describe serious exploitation.

While there is no globally agreed definition of 'modern slavery', the term is widely used to cover a range of practices that use coercion, threats, violence, or the abuse of power to exploit and deprive people of their freedom.

This includes human trafficking, slavery, and slavery-like practices such as servitude, forced marriage, forced labour and debt bondage, deceptive recruiting for labour or services and child labour.

Guiding Principles

- We are opposed to all forms of modern slavery.
- We are committed to being transparent about risks of modern slavery within our operations and supply chains, and the steps taken to address those risks.
- Employment must be freely chosen, and employees must be free to leave employment after reasonable notice.
- Wages, benefits, working hours and conditions, and employment records must comply with applicable local laws and must be able to be verified to ensure compliance.
- Workers must not be below the applicable local legal minimum working age and their age must be able to be verified to ensure compliance.
- Entitlements of migrant workers must comply with applicable local laws.
- Where subcontracting is permitted, there must be adequate controls in place to ensure that their subcontractors comply with this policy.

Our approach to Modern Slavery

As a leading not for profit community housing provider, we provide sustainable, safe and affordable housing as the foundation for our customers to connect to opportunities. Our values of innovation, support, accountability, respect and integrity are key to our operations.



We acknowledge that we have obligations to protect human rights, starting from the way we conduct our business now and into the future and are committed to ensuring transparency in our operations and approach to tackling modern slavery.

We have a Supplier Modern Slavery Protocol which meaningfully communicates our zero-tolerance approach to modern slavery to all suppliers, and the standards to which suppliers must adhere.

Our operations and supply chains

Our operations involve customer service, managing assets and development. The construction/building sector has been linked to having a high prevalence of modern slavery.

We want to partner with suppliers who are willing to join us in strengthening our response to modern slavery and understand that the modern slavery risks relating to suppliers will vary depending on their industry, geographic location, company size and various other factors.

Risk assessment and due diligence

We have practices and processes in place, to assist in identifying areas of concern so that we can take action to lessen those risks. These include:

- Inclusion of mandatory modern slavery clauses in procurement contracts.
- Due diligence processes before engaging new suppliers and ongoing assessment of awareness and compliance.
- Setting expectations with suppliers and educating them in relation to mitigating the risk of modern slavery in our supply chains.
- Our Whistleblower Policy which encourages reporting of modern slavery by providing protections for eligible whistleblowers.
- Training to increase awareness of modern slavery amongst our team members.

Reporting concerns

All team members, contractors and suppliers have a responsibility to report any concerns they may have in relation to modern slavery within our operations and supply chains.

Concerns about modern slavery can also be reported under our [Whistleblower Policy](#). Further details about reporting, confidentiality and protections for eligible whistleblowers are outlined in our [Whistleblower policy](#).

Compliance

If our team members are found to be involved in, or conspiring to be involved in modern slavery conduct, they may face disciplinary action in accordance with our Disciplinary Action policy.

We are committed to working with suppliers to resolve any breaches of this policy and/or their contractual obligations related to modern slavery, however, where we are unable to do this, we may take action to terminate our engagement with those suppliers.

Relevant laws, regulations or standards

- [Modern Slavery Act 2018 \(Cth\)](#)

Policy information

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