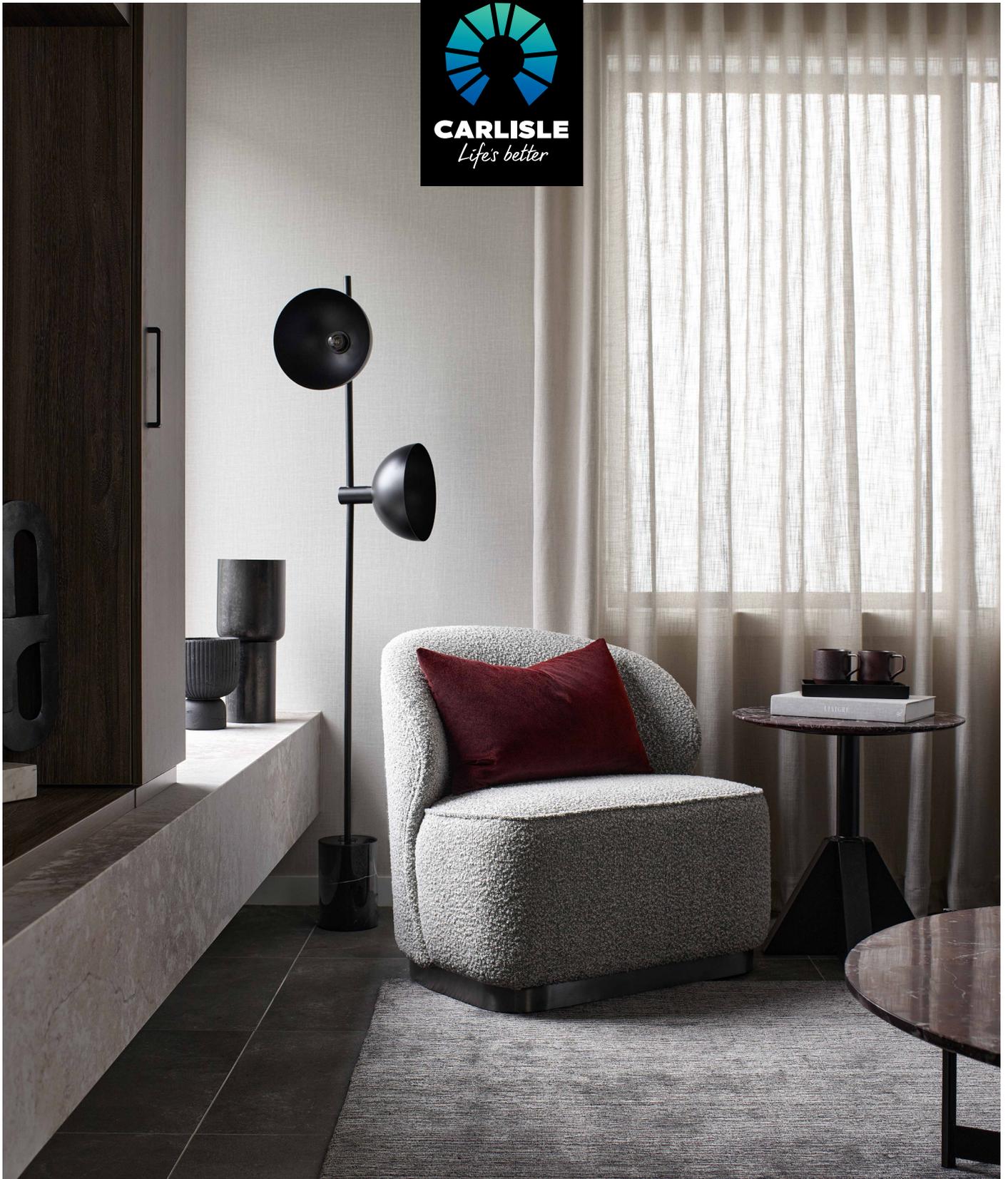




**CARLISLE**  
*Life's better*



# **CARLISLE HOMES**

MODERN SLAVERY STATEMENT 2021

Carlisle Homes submits this Modern Slavery Statement for the financial year ending 30 June 2021 and in accordance with the *Modern Slavery Act 2018* (Cth).

This Modern Slavery Statement for FY2021 is the second Statement prepared by Carlisle Homes. Since the submission of its first Statement, Carlisle Homes' Anti-Modern Slavery Working Group has taken steps to identify and address the risks of modern slavery within its operations and supply chains.

# ABOUT US

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**Established in 2004, Carlisle Homes has constructed over 15,000 homes across Victoria.**

In 2015, 2017 and 2020, Carlisle Homes was awarded the Victorian Professional Major Builder by the Housing Industry Association (HIA). We are incredibly proud to have won the HIA's Most Professional Builder in Australia for 2021. To win the award at a national level is a testament to the efforts of the entire Carlisle Homes' team as well as our valued suppliers and trades.

We acknowledge our wider corporate responsibility, and we are committed to continuously improving our practices to reduce the risk of modern slavery within our business.

# OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

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Carlisle Homes Pty Ltd is a privately owned, Victorian residential building company with approximately 500 employees.

Our supply chains involve products and services that contribute to the design, marketing, sale and construction of residential dwellings.

This includes:

- construction goods and materials;
- specialised trades and labour; and
- operational support services including finance, technology, human resources, sales, marketing, procurement, development and design.

Aside from drafting services in Vietnam and India, all of our direct suppliers are located in Australia.

# RISKS OF MODERN SLAVERY IN OUR OPERATIONS

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We consider that the risk of modern slavery within our direct operations is low. We have high visibility over our direct resources and we have a dedicated human resources team to ensure compliance with Australian workplace laws and best practice.

# RISKS OF MODERN SLAVERY IN OUR SUPPLY CHAINS

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Through direct consultation with our suppliers, we have identified several inherent risks of modern slavery within our complex supply chains. The following sectors, located both locally and abroad, have been deemed a moderate to high risk for modern slavery practices:

Sector	Description of Risk
Labour	<p>Careless or inadvertent contravention of workplace and human rights laws, including working conditions and pay, within labour hire companies and subcontractors.</p> <p>Carlisle Homes expects that its direct suppliers ensure compliance with Australian workplace laws however this risk may increase where labour is subcontracted, resulting in less visibility across the supply chain.</p>
Raw materials to manufactured, finished products	<p>Goods and materials are sourced from countries which are deemed moderate to high risk due to poor governance, child and/or forced labour, inequality and conflict.</p> <p>The risk depends on the product type and country of origin, which includes:</p> <ul style="list-style-type: none"> <li>• Polysilicon for solar panels from China;</li> <li>• Synthetic resins and fibre from Indonesia;</li> <li>• Glass wool and rockwool insulation from Malaysia;</li> <li>• Polyester fibre from Thailand; and</li> <li>• Structural and brick steel from China.</li> </ul> <p>Products sourced locally, including cement and clay products, are considered to be low risk.</p>

# ACTIONS TAKEN AND CURRENT INITIATIVES

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In 2020, we established an Anti-Modern Slavery Working Group consisting of representatives from our Procurement, Human Resources and Legal Teams.

The Working Group has met throughout FY21 on a quarterly basis, to progress several initiatives in order to identify, prevent and account for modern slavery risks. A summary of the initiatives is as follows:

- **Supplier Questionnaire**

We have issued a detailed questionnaire to each our suppliers to determine the visibility each organisation has over its supply chain and whether any risks had been identified and addressed.

- **Consultation with Stakeholders**

The information obtained from completed questionnaires and our supplier's own Modern Slavery Statements will inform further, more detailed consultation and training with stakeholders in FY2022.

- **Supplier Code of Conduct**

We have prepared a Supplier Code of Conduct, confirming our zero-tolerance approach to modern slavery.

- **Procurement Policy**

We will draft a Procurement Policy, for distribution in FY2022.

# ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

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The Anti-Modern Slavery Working Group has developed Key Performance Indicators (KPIs) in order to review and report on its progress.

Our KPIs for FY2022 are:

- **Supplier Engagement**

Increased completion rates for supplier questionnaire

- **Employee training and awareness**

Ensure all employees that have roles dealing with suppliers, such as the Procurement Team, receive ongoing updates and training.

Our progress in respect to the above initiatives will be reported on in our FY2022 Modern Slavery Statement.

# CONSULTATION WITH OTHER ENTITIES

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We do not own or control any other entities and therefore the criteria set out in Section 16(1)(f) of the Modern Slavery Act is not applicable.

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*This statement was approved by John Doulgeridis as the sole director of Carlisle Homes Pty Ltd,*





**CARLISLE**  
HOMES

