



HIA

Modern Slavery Statement

For the year ended 31 December 2024

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1. Overview

1.1 About HIA

The Housing Industry Association Limited ABN 99 004 631 752 (HIA) is Australia's peak national industry association for the residential construction and home building industry.

Our mission is to:

"promote policies and provide services which enhance our members' business practices, products and profitability, consistent with the highest standards of professional and commercial conduct."

Founded in 1945 against the backdrop of a substantial housing shortage caused by wartime restrictions and increased population growth, HIA's initial role was to help Victoria's home builders lobby for better access to building materials and supplies in the post-war period.

In the following decades, HIA consolidated its efforts to strengthen and improve the environment for home building, expanding from Victoria into the other states and territories to become the only national industry association for all building professionals, representing the residential building industry – from trade contractors, builders and suppliers to developers and product manufacturers.

HIA now has more than 20,000 financial members. We are celebrating our 80th year in 2025.

1.2 Reporting Period and Reporting Entity

This Modern Slavery Statement is made by HIA and its controlled entities in accordance with the requirements of section 16 of the Modern Slavery Act 2018 (Cth). It describes our modern slavery risks and responses to these risks across our corporate structure during the financial year ended 31 December 2024.

The reporting entity for the purposes of this Statement is Housing Industry Association Limited. While HIA and its controlled entities had consolidated revenue of more than \$100 million (AUD) for the reporting period, HIA's controlled entities do not meet the threshold for mandatory reporting on an individual basis and are not reporting entities in their own right.

This is the first reporting period in which HIA has met the definition of a "reporting entity" and is our initial Modern Slavery statement.

1.3 HIA's Position on Modern Slavery

What is Modern slavery?

In this Statement, "modern slavery practices" include trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour (situations where children are subjected to slavery or similar practices, or engaged in hazardous work) and deceptive recruiting for labour or services.

HIA is committed to ensuring Modern Slavery is not taking place in any part of our business operations, nor in any of our supply chains.

HIA understands the importance of understanding the modern slavery risks that we are exposed to, as well as the importance of developing appropriate measures to address them.

Our early assessment is that due to the nature of our operations there is a low risk of modern slavery, both in our supply chains and in our operations more generally.

However, our approach is iterative, and we are still undertaking scoping and due diligence of key contracts and suppliers to better understand the risks of modern slavery in our business operations and within our supply chains. This work will help inform our thinking about how we will more actively minimise any risk in the future.

1.4 Approval & Signature

This Statement has been approved by the HIA National Board in accordance with the requirements of the Act.

A handwritten signature in dark ink, appearing to read 'Jocelyn Martin', is positioned above the printed name and title.

Jocelyn Martin
HIA Managing Director

2. Our Structure, Operations & Supply Chains

2.1 Structure

HIA is a member based not for profit industry association and company limited by guarantee incorporated in Australia.

HIA is the parent company of the HIA corporate group (Group) which also comprises the following wholly owned entities:

- HIA Services Pty Ltd
- HIA Group Apprenticeship Scheme (SA) Limited
- HIA Tradebuild Pty Limited
- HIA Legal Services Pty Limited
- HIA Holdings Pty Limited
- HIA Properties Pty Limited
- Housing Industry Housing Pty Limited
- Buildingonline.com.au Pty Ltd
- Home Owners Warranty Limited
- Construction and Housing Association Australia Pty Ltd
- Apprentices Direct Pty Limited

HIA's structure also includes a registered charity, the HIA Charitable Foundation (ABN 37 685 982 657). The HIA Charitable Foundation is a public ancillary fund that raises funds from donations and fundraising activities, providing grants to support charitable causes and organisations connected to the residential building industry.

HIA conducts day to day operations for the Group and employs the majority of the Group's employees.¹

HIA is governed by a National Board of Directors elected and appointed in accordance with HIA's Constitution and By-Laws. HIA's Manager Director and its senior management team manage and coordinate the Group's operations.

2.2 Operations

HIA's operations, services and functions are directed to support its main purpose of "promoting the development of the building industry".

Our Workforce

HIA operates from 17 office locations across all states and territories, with our national office based in Canberra. All our workforce and operations are located within Australia.

HIA currently employs 300 permanent employees, the majority of whom undertake professional, office-based roles. HIA also employs approximately 500 to 600 apprentices and trainees (at any given time).

HIA's employees are engaged in accordance with applicable workplace laws.

¹ HIA Group Apprenticeship Scheme (SA) Ltd is the separate employer of HIA's South Australian group scheme apprentices. HIA Legal Services Pty Ltd is also the direct employer of staff involved in the operation of an incorporated legal practice in Queensland.

Our Services

- Operating a membership organisation that provides advice, support, products and services for its members and customers;
- Advocating for the interests of the residential building industry and HIA's members to government bodies, regulators and the general public through policy submissions, media campaigns, industry research and direct engagement;
- Providing business and technical support and advice to members. These services are provided through a range of channels, including our website and direct member contact;
- Delivering and hosting numerous events each year, including conferences, industry functions, webinars and HIA's annual Housing Awards programme;
- Trading as "HIA Apprentices", operating a group training organisation (GTO) business that directly employs construction apprentices and trainees who are placed with host employers (builders and trade contractors) for on-the-job training and work experience;
- Supporting the career development and professional growth of members and the industry at large by:
 - Being a registered training organisation (RTO ID:1091) delivering a range of nationally recognised training qualifications for the building and construction industry;
 - Providing access to ongoing professional development educational activities;
- Developing and publishing industry specific products and materials including HIA's national magazine "Housing", HIA's suite of standard form residential building contracts and specifications and templates that are available to members and non-members for purchase on a commercial basis;
- Managing the day-to-day activities of the HIA Charitable Foundation.

2.3 HIA's Supply Chains

HIA's supply chains reflect the services-based nature of our operations.

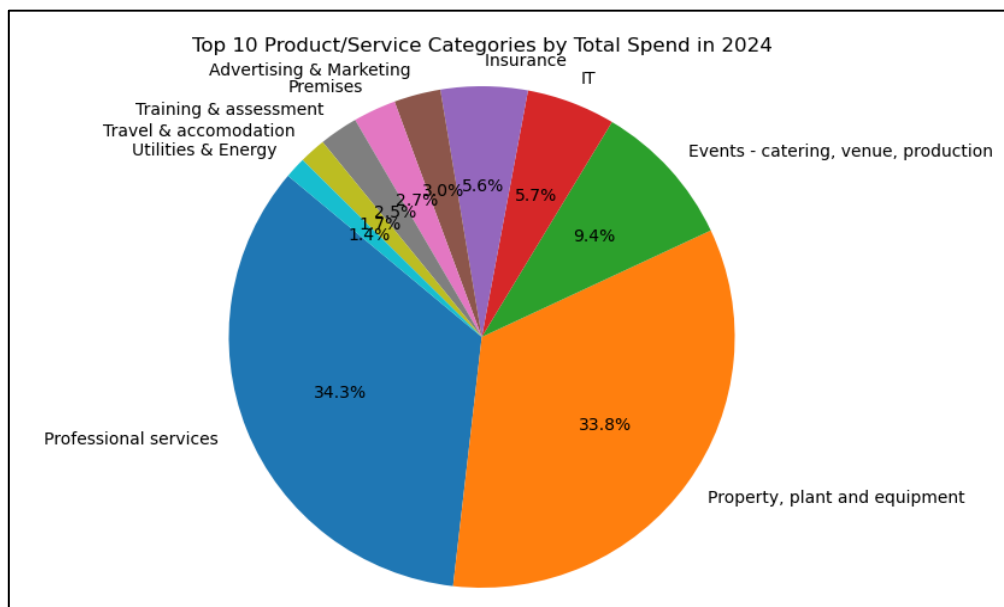
Local business units engage and manage the majority of HIA's suppliers, although procurement is overseen by a centralised process controlled by HIA's national finance team.

For the reporting period, HIA's procurement spend was spread across more than 1,000 direct (Tier One) suppliers of goods or services. Vendors were engaged across the following broad business activities, functions and categories:

- Insurance;
- Advertising and market;
- Training and education services, including contract trainers providing training and assessment services to HIA's RTO;
- Events management – catering, venue, production;
- Printing and stationery;
- Award prizes and framing;
- Property management including leasing costs, cleaning, utilities (water, electricity, rates), building construction, repairs and maintenance;

- Services to HIA's workforce, including staff training, meals and refreshments, recruitment, employee wellness, staff uniforms and PPE;
- Travel and accommodation;
- Professional/corporate subscriptions;
- Technology – software, hardware, consulting;
- Professional services – legal, audit and accounting.

Chart A: Top 10 Product/Service Categories by Total Spend in 2024



Notable features of HIA's supply chain:

- Given the nature of our operations and the services we provide to our members and customers, HIA has a large number of small suppliers, particularly suppliers of advertising and marketing, contract training services, events management (catering, venue, production), office cleaning, staff meals and refreshments, property repairs and maintenance and printing and stationery.
- Almost all of HIA's suppliers are based in Australia. A very small number of HIA's software vendors are based overseas. HIA's aggregate expenditure with these businesses was only \$25,000.
- A large number of small sole traders are engaged by HIA's registered training (RTO) operations to delivery training and assessment services to students.
- A significant proportion of HIA's procurement is sourced from lower value, one-off suppliers especially in the areas of venue hire, events management and catering, staff meals and refreshments, property repairs and maintenance and printing and stationery.

Chart B: Vendor Spend Analysis

Less than \$1,000	32.42%
Less than \$10,000	70.77%
Greater than \$50,000	7.74%

3. Risk of Modern Slavery at HIA

3.1 Summary

We have not identified any modern slavery incidents in our supply chains and operations.

- Although we have not previously included explicit modern slavery risk assessments in our due diligence processes, we have assessed our operational environment and do not consider that we operate in sectors that are considered high risk in relation to modern slavery and human trafficking.
- As an industry association, we do not construct, produce or manufacture products and do not have a retail supply chain.
- We also do not procure goods and services from sectors typically considered to contain high modern slavery. We directly engage very few overseas suppliers. Many of the vendors we engage do not have intricate supply chains or multiple levels of contracting.

Below summarises our approach to assessing and identifying risk for the reporting period and actions taken to address and mitigate these risks

3.2 Risk Assessment

For this initial reporting period we have adopted a risk based approach.

Firstly, we undertook a high level desktop audit of our vendors, using information collected in our financial and expense management systems, information from invoices and publicly available data.

Following this, the focus of our due diligence activities was on those aspects of our supply chain where there was a greater risk. A Supplier Assessment Questionnaire was developed and distributed to selected suppliers as follows:

- Annual expenditure greater than \$50,000, on the basis that these entities prima facie represent a greater material risk from both a financial and operational perspective.

The following were not included in this initial exercise:

- Government entities – on the basis that there is a lower inherent risk with regulatory and public bodies given they have pre-established procurement frameworks.
- Sole traders – these vendors operate on a smaller scale and are less likely to utilise complex supply chains. Additionally, we typically maintain a close, direct relationship with these providers.
- Entities that are already listed on the Australian Modern Slavery Register – these entities are already subject to mandatory modern slavery reporting and are expected to have implemented relevant due diligence processes.

Our decision to exclude certain suppliers from this early phase of assessment was based on practical considerations including data availability, timing constraints and resource

prioritisation. It does not reflect the view that these suppliers or sectors are free from modern slavery risks.

3.3 Evaluating the Effectiveness of our Actions and Future Commitments

We have not identified that modern slavery has occurred in our operations or supply chains.

In part, we will know whether our assessment was successful if no reports are subsequently received from employees, members, regulators or stakeholders that modern slavery practices exist within our supply network.

We, however, acknowledge that modern slavery can occur in any sector, regardless of the size of the supplier or the nature of the organisation and that the risks of modern slavery may be hidden in our supply chains.

We also recognise that this is HIA's first Modern Slavery Report and is the first reporting period that we have been required to undertake compliance activities or implement measures required by the Act, including due diligence assessments. As such, we are still in the early stage of developing our approach to these matters and have not been required to take any direct action in response to these risks.

As part of our iterative efforts of continuous improvement we plan on continuing and building on our initial measures during the next reporting period.

Below is an outline of the action we intend to take during the next report period:

- **Expanded assessment of tier one suppliers**

During the 2024 reporting period, we began the process of issuing modern slavery questionnaires to a selected group of suppliers. We envisage expanding the due diligence activities to further vendors in the supply chain, including suppliers of technology products and commercial cleaning services and if necessary, integrating and acting on any findings.

Any identified instances of modern slavery would need to be addressed.

- **Strengthening our policies and governance**

We intend to establish a Modern Slavery Policy to formally outline the policies, procedures and practices we use to identify, address and mitigate the risk of modern slavery.

- **Contract management**

Updating HIA's template procurement contracts to include standard clauses requiring compliance with the *Modern Slavery Act*.

- **Providing modern slavery training to relevant employees**

As part of our training compliance program, we will be introducing modules in our online learning environment relating to modern slavery, amongst other things.