

Home
in Place

MODERN SLAVERY STATEMENT

2021-2022



The Commonwealth Modern Slavery Act 2018 established Australia's national Modern Slavery Reporting Requirement. Under this reporting requirement entities with an annual consolidated revenue of at least AUD \$100 million must publish their annual Modern Slavery Statement describing their actions to assess and address modern slavery requirements.

This is the first statement submitted by Home in Place and covers our reporting period 1 July 2021 to 30 June 2022.

Target 8.7 under the 17 United Nations Sustainable Development Goals (SDGs) is the commitment from the international community to end modern slavery by 2030. Home in Place is committed to engaging in collaborative projects that advance the broader development goals of the SDGs and we continue to communicate this commitment to our stakeholders and the general public. We have aligned our Strategic Plan with the SDGs converting from a three-year plan to a 2030 plan in support of the Decade of Action.



WHO WE ARE

Compass Housing Services Co Limited trading as Home in Place (Home in Place) is an enterprising and socially committed international non-governmental organisation (NGO) that provides social and affordable housing for low to moderate income households. With more than 7,800 properties under management, Home in Place is one of the largest non-government providers of subsidised housing in Australia.

With a track record stretching back more than 35 years, Home in Place has extensive experience in all aspects of tenancy and property management and has successfully operated under a wide range of state and federal government initiatives and housing programs.

OUR VISION “THAT ALL PEOPLE HAVE APPROPRIATE AND AFFORDABLE SHELTER AND ARE ENGAGED IN SUSTAINABLE COMMUNITIES”.

In pursuit of this goal, Home in Place has developed an approach to service delivery which integrates tenancy and property management within a broader network of services and maximises opportunities for tenants to increase their economic and social participation, within our operating approach called P5: People, Place, Performance, Partnership and Planet.

Underpinning our company vision is a belief that safe and adequate housing is a basic human right.

At Home in Place, we act with uncompromising honesty and respect in everything we do. Our Values stem from a tradition of honesty and respect and shape our future. Our values are not contrived or imposed but a reflection of how we do things, how we think, what drives us and where we want to go. At Home in Place our values are both a reflection of who we are and a projection of who we want to be.



LIVING OUR VALUES

EMPOWERMENT

At Home in Place, we are building a better future by sharing responsibilities and the opportunities and respecting the individual and their community.

ASPIRATION

At Home in Place, we dare to think big and work to achieve our mission.

INNOVATION

At Home in Place, we achieve our mission by challenging the status quo and collectively always working for better.

LEADERSHIP

At Home in Place, we are all determined to achieve our mission and encourage and support results that are motivated by decisions and behaviours that reflect our values.





TRUST

At Home in Place we firstly rely on the integrity, honesty and goodwill of our staff, stakeholders and partners supported by our policies, processes and technology.

ACCOUNTABILITY

At Home in Place each of us is responsible for our words, our actions and our results and collectively focus on our values, mission and plan.

SUSTAINABILITY

At Home in Place, we contribute to sustainable operational and environmental solutions through responsible actions, respect, advocacy and a focus on the long term.

COLLABORATION

At Home in Place our best results are achieved when we work together with honesty and respect.

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

HOME IN PLACE GROUP STRUCTURE

Home in Place is a public company Limited by guarantee and is registered as a charity in Australia under the oversight of Australian Charities and Not-for-Profit Commission (ACNC). We are registered under the National Regulatory System for Community Housing (NRSCH) as a Tier 1 provider and hold a full certificate of accreditation under the National Community Housing Standards. Additionally, Home in Place is registered under the Quality and Safeguards Commission for providing Specialist Disability Accommodation, as well as the Australian Council for International Development (ACFID).

Home in Place provides tenancy and/or property management for over 7,800 social, affordable and disability housing properties in New South Wales, Queensland, Victoria and New Zealand. The Home in Place Specialist Disability Accommodation (SDA) team manages 1500 places for people with high support needs.

Compass Housing Services Co Limited trading as Home in Place is the parent company of the following wholly owned subsidiaries:

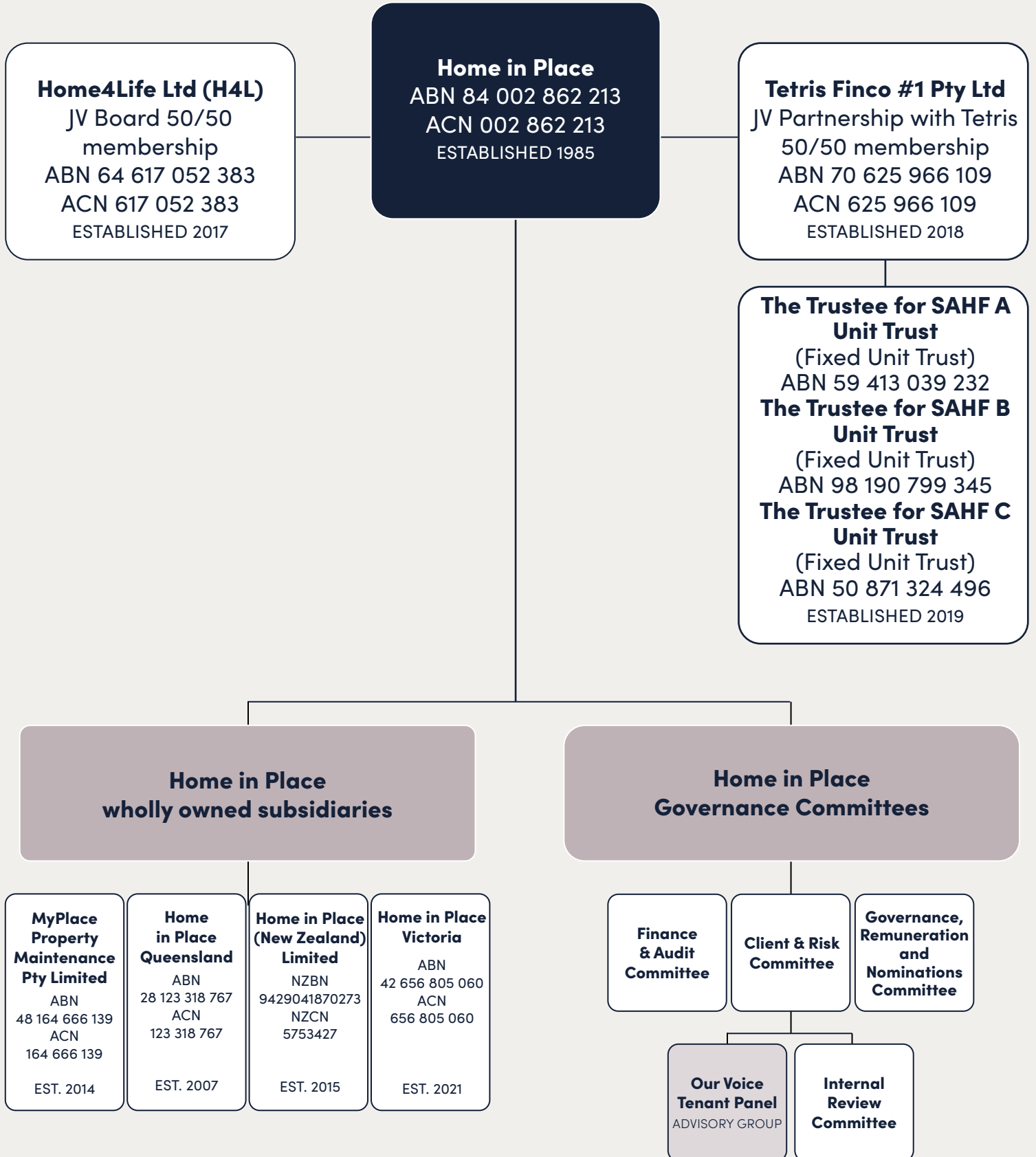
- Compass Housing Services Co (Queensland) Ltd trading as Home in Place Queensland (Home in Place Queensland) ABN 28 123 318 767
- Compass Housing Services (VIC) Ltd trading as Home in Place Victoria (Home in Place Victoria) ABN 42 656 805 060
- Home in Place (New Zealand) Limited NZBN 9429041870273
- MyPlace Property Maintenance Pty Limited ABN 48 164 666 139

This Statement covers Home in Place and each of the Australian entities it controls.

In addition to the above controlled entities, Home in Place is an equity investor in the following joint venture companies:

- Home4life Limited
- SAHF A Pty Ltd
- SAHF B Pty Ltd
- SAHF C Pty Ltd

HOME IN PLACE GROUP STRUCTURE



HOME IN PLACE OPERATIONS

The Home in Place Group is one of the largest regionally based community housing providers in Australia operating across 74 local government areas in NSW, Queensland, Victoria and New Zealand.

Our portfolio of properties includes a combination of heavily subsidised social housing for low-income households, discount-to-market affordable housing for workers, supported housing for people transitioning from homelessness, and specialist disability housing for people with physical and intellectual disabilities.

Furthermore, Home in Place provides tenancy and property management services for Aboriginal Housing Office properties in Brewarrina, Bourke, Broken Hill, Dubbo, Maitland, Menindee, Newcastle, Walgett, Lightning Ridge and Wilcannia as well as managing Employment Related Accommodation for Aboriginal people in Dubbo, Maitland and Newcastle.

We manage crisis and transitional accommodation for Aboriginal women and children fleeing domestic and family violence in several Western NSW towns.

We have partnerships with a number of support agencies to provide a wholistic and socially inclusive service to our residents aimed at enabling tenants and their families to enjoy safe and sustainable tenancies and participate actively in their local communities.

SNAPSHOT OF OUR ASSETS

PROPERTIES MANAGED IN AUSTRALIA AND NEW ZEALAND

7,846

TOTAL NUMBER OWNED

1,723

LOCAL GOVERNMENT AREAS

74

LOCATIONS

15



HOME IN PLACE SUPPLY CHAINS

We are committed to sustainable procurement that delivers fair value for money. Value for money is not just measured by lowest price but must also advance Home in Place’s group strategic, social, and environmental objectives and be procured from ethical organisations and individuals focused on ensuring sustainable practices throughout their supply chain.

Our supply chain is made up of approximately 1,400 suppliers located in the jurisdiction in which we operate. Of these suppliers 1,300 are based within Australia. We acknowledge that our supply chain extends beyond these direct suppliers.

The major categories of suppliers are as follows:

| | |
|------------------------------|--|
| Real Estate | Premises our Home in Place tenants live in, the premises our businesses operate in, and premises our staff work in. |
| Property/facility management | Cleaning, security, property maintenance, property repairs, builders, property refurbishments, furniture, and equipment. |
| Fleet Services | Vehicle leasing and maintenance. |
| Labour | Staff wages and labour hire, recruitment agencies. |
| Utilities and Rates | Electricity, gas, water and council rates. |
| Health and wellbeing | Personal Protective Equipment (PPE) (masks, hand sanitisers, gloves etc), children’s educational equipment. |
| ICT Hardware and Software | Laptops, screens, printers, cabling, software, support, and network/support services. |
| Travel | Airlines, accommodation. |
| Professional Services | Legal, financial, insurance, architectural and engineering services, planning, surveying and environmental services, IT service providers. |

MODERN SLAVERY RISKS

Corporate governance drives risk management and the Home in Place parent Board of Directors is committed to embedding risk management into our day-to-day operations and managing risks in ways that are consistent with the principles and guidelines of AS ISO 31000:2018, the Home in Place Group Charter, Home in Place Risk Policy and Risk Appetite Statement, subsidiary board charters and the terms of reference of committees and advisory groups.

Home in Place is committed to integrated risk management as an essential part of its operations and decision making. Risk management creates and protects value by improving performance, encouraging innovation and supporting achievement of our objectives.

Freedom from slavery is a fundamental human right and under the United Nations Guiding Principles on Business and human rights, entities have a responsibility to respect human rights in their operations and supply chains.

Home in Place values in its partners' organisational commitment to contributing to the achievement of the United Nations Sustainable Development Goals (SDGs), including objectives to end poverty, protect women and children and promote climate change mitigation.

HOW WE IDENTIFY OUR MODERN SLAVERY RISKS

Australia's Modern Slavery Act (Cth) 2018 defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour services; and the worst forms of child labour (situations where children are subjected to slavery or similar practices or engaged in hazardous work).

Home in Place's approach to the risk management process is to identify, analyse, evaluate risk, and implement appropriate measures to manage our risk to minimise losses and maximise opportunities for the organisation. Home in Place is opposed to any forms of modern slavery.

To identify any risks of modern slavery we have mapped our supply chain structure and the general sectors and industries in which they operate, the types of products and services they supply and their geographical locations.



OUR ACTIONS

HOW WE ASSESS AND ADDRESS MODERN SLAVERY RISKS

Home in Place has a group wide Procurement Policy that outlines the principles regarding the acquisition of all goods and services to ensure procurement is undertaken in accordance with the objectives and principles outlined in the policy. Specifically, the goals are to:

- Make procurement decisions based on fair value for money;
- Use all reasonable endeavours to ensure our suppliers and partners apply ethical and sustainable business practices;
- Use all reasonable endeavours to ensure investment decisions are sustainable;
- Embrace ethical and sustainable work practices and behaviours that improve social and environmental outcomes; and
- Comply with recognised standards and legal requirements of child safeguarding and modern slavery prevention.

This is Home in Place's first Modern Slavery Statement. Going forward our due diligence approach will be to engage with our key suppliers to understand how they are addressing their modern slavery risks having major suppliers confirm at least annually their compliance with our terms of trade and anti-slavery requirements.

We have a Code of Conduct policy that provides a framework for conducting business and interacting with clients, colleagues and stakeholders, this policy applies to all workers, directors and members of governance committees and advisory panels of the Home in Place Group.

Our Code of Conduct includes an additional code of conduct (Safeguarding of Children) Commitments. These commitments incorporate the DFAT Child Protection – Professional Behaviours and are in compliance with Commitment 1.4.2 (Safeguarding of Children) in ACFID Code of Conduct.

We have a Whistleblower Policy that allows officers and workers to raise concerns internally about suspicious activity, misconduct, or wrongdoing confidentially and without fear of recrimination, reprisal or disadvantage. This Policy also applies to contractors, suppliers and their employees, volunteers, Partners, and their staff. It is expected that Partners will have policies, procedures or similar in place covering Whistleblowing wrongdoing. In the absence of such policies and procedures they will be expected to adopt Home in Place policies and procedures.



ASSESSMENT OF THE EFFECTIVENESS OF OUR MODERN SLAVERY RISK REDUCTION ACTIONS

Home in Place is committed to continually improving our methods to identify risks in our operations and supply chains.

We will:

- engage with our key suppliers to understand how they are addressing their modern slavery risks and have them confirm at least annually their compliance with our terms of trade and anti-slavery requirements.
- continue to monitor and map our supply chain to identify which of our suppliers are of higher risk than others.
- continue to review our policies and procedures to ensure all relevant policies and procedures include specific references to modern slavery law compliance and ensure all staff have access to these.
- undertake random audits of our procurement processes to ensure compliance with modern slavery law.



CONSULTATION

This Statement is provided on behalf of the Home in Place Group which wholly owns four subsidiaries. Each subsidiary adopts the same policies and processes and shares the same supply chain. In preparing this Statement Home in Place engaged and collaborated with representatives of all business divisions.

GOVERNANCE AND ACCOUNTABILITY

Home in Place's Client and Risk Committee has responsibility for overseeing the Group's response to modern slavery risks as part of its overall risk management. The Home in Place Group Executive team reviews emerging risks and opportunities, leads stakeholder engagement and facilitates the sharing of best practice throughout the Group. The Board and Management teams have responsibility for identifying and managing any material risks in accordance with the Group's Risk Management Framework including Modern Slavery Risk.

ENDORSEMENT

Each Statement issued by Home in Place will be approved by the Board and signed by a Director.

This Statement was considered and approved by the Home in Place Board for the relevant entities of the Home in Place Group on 21 November 2022 and signed by:



Kwesi Addo
Chair of Home in Place

HOME IN PLACE HEAD OFFICE

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