



**CARLISLE**  
*Life's better*



# **CARLISLE HOMES**

MODERN SLAVERY STATEMENT 2022

Carlisle Homes Pty Ltd (ACN 106 263 209) submits this Modern Slavery Statement for the financial year ending 30 June 2022 and in accordance with the *Modern Slavery Act 2018* (Cth).

This Modern Slavery Statement for FY2022 is the third Statement prepared by Carlisle Homes. Through its Anti-Modern Slavery Working Group, Carlisle Homes has made significant progress in identifying and addressing the key areas of risk within its operations and supply chains.

# ABOUT US

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**With 17 years of experience, Carlisle Homes has constructed over 16,000 quality homes across Geelong and Melbourne.**

We have won several industry awards each year for the past 17 years in building, design, quality and innovation in customer service.

In 2015, 2017, 2020 and 2022, 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 improving our processes and partnering with our supply chain to reduce the risk of modern slavery within our business.

# OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

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

Our Head Office and Spectra Showroom is located in Mulgrave, which is home to just under 400 of our employees.

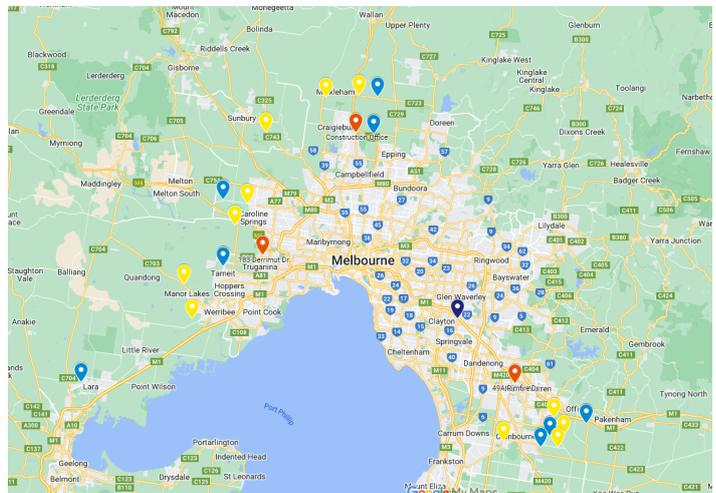
Additionally, our team works across 25 display home centres and 3 construction offices around Victoria.

Our direct business operations comprise of the following divisions:

- Construction
- Customer service
- Sales
- Procurement
- Development and Design
- Human Resources
- Marketing
- Finance
- Technology
- Legal

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

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



-  Head Office and Spectra Showroom
-  Display Home Centres
-  Construction Offices

# RISKS OF MODERN SLAVERY IN OUR OPERATIONS

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As outlined in our previous Modern Slavery Statements, we have determined 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.

We are aware that the risk of Modern Slavery lies within the complex supply chains that are evident within the construction industry. Accordingly, we have focused our efforts on consultation and collaboration with our suppliers.

# 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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Carlisle Homes' Anti-Modern Slavery Working Group continues to meet on a quarterly basis. The Working Group has progressed several initiatives in order to identify, prevent and account for modern slavery risks. A summary of achievements and initiatives in FY22 is as follows:

- **Supplier Questionnaire**

In FY21 we 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. Throughout FY22 we have continued to engage with our suppliers and have successfully increased the questionnaire completion rates.

- **Consultation with Stakeholders**

The information obtained from completed questionnaires and an analysis of our supplier's own Modern Slavery Statements has resulted in further, more detailed consultation with stakeholders.

In particular, we have engaged with a key supplier in respect to the steps taken to protect its large migrant workforce and labour hire workers.

- **Contract Clauses**

A clause has been inserted into newly negotiated supplier contracts, requiring the supplier to take reasonable steps to identify, assess and address the risks of Modern Slavery and to take action in the event of an actual or suspected occurrence.

- **Zero Harm Initiative**

In FY22 Carlisle Homes established a Zero Harm working group which, in consultation with industry bodies, aims to prioritise and improve the health and safety of its employees.

- **Supplier Code of Conduct and Procurement Policy**

We have prepared a Supplier Code of Conduct and Procurement Policy, confirming our zero-tolerance approach to modern slavery. In FY22 we have taken steps to determine best practice for distribution and acknowledgement, ensuring that all suppliers are captured. This will be implemented in FY23.

- **Covid-19 Response**

As residential construction was deemed an essential service, Carlisle Homes has continued to operate its business throughout the pandemic.

Employee and contractor safety has been a major focus, however our operations have been affected by labour and material shortages. Carlisle Homes acknowledges that the economic and social impacts of Covid-19 may increase modern slavery risks and will work to identify and address such risks.

# 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 FY2023 are:

- **Supplier Engagement**

Increased completion rates for supplier questionnaire.

This was included as a KPI in the previous reporting period and has been achieved. We will continue to focus on supplier engagement to increase completion rates moving forward.

- **Supplier Acknowledgment**

Supplier sign-off on the Code of Conduct and Procurement Policy.

Inclusion of the Anti-Modern Slavery Contract Clauses in all agreements.

- **Zero Harm Policy**

Establish a Zero Harm policy to improve the health and safety of employees.

Our progress in respect to the above initiatives will be reported on in our FY23 Modern Slavery Statement.

# CONSULTATION WITH OTHER ENTITIES

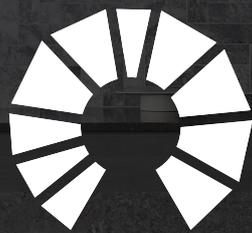
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Carlisle Homes does not own or control any other entities and therefore the criteria set out in Section 16(1)(f) of the Modern Slavery Act is not applicable.

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





**CARLISLE**  
HOMES

