

Housing Choices Australia Group Modern Slavery Statement

Reporting period: 1 July 2023 to 30 June 2024

Date of submission: 19 December 2024

This modern slavery statement sets out the actions taken by Housing Choices Australia Limited and affiliated entities (the HCA Group) to consider and address the risks of modern slavery and human trafficking in our business and supply chains for the financial year 1 July 2023 to 30 June 2024.

This statement was approved by Board of Housing Choices Australia Limited and its subsidiaries on 18 December 2024.

This modern slavery statement is signed by the Housing Choices Australia Limited Chief Executive Officer on behalf of the Board:



David Fisher, Chief Executive Officer

The HCA Group is committed to implementing, sustaining and improving systems, structures and practices to prevent modern slavery or human rights violations in relation to its operations, services or programs, procurement and supply chains.

We understand that modern slavery, where offenders use coercion, threats or deception to exploit victims and undermine their freedom, occurs in many forms, including human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour.

The HCA Group is committed to delivering its purpose and conducting its operations in a responsible and ethical manner and does not tolerate any form of modern slavery in our business and supply chain.

About the HCA Group

Housing Choices Australia Limited and its subsidiaries (the HCA Group) are an independent, national, not-for-profit housing provider. We deliver affordable, quality housing for people who struggle to find homes that meet their needs in the private rental market. It is our vision that all people in Australia have a safe, affordable home and the opportunity to thrive. We are one of the largest community housing providers in

Australia, with operations in Victoria, South Australia, Tasmania, New South Wales and Western Australia.

It is our purpose to provide safe, secure, affordable and accessible homes with connection to community and services that enable people to build their lives.

Housing Choices currently manages 7,505 social and affordable properties that are home to more than 13,000 residents across five Australian states. Our organisation manages assets worth \$1.5 billion, owns \$1.3 billion in assets, and operates with an annual turnover of \$110 million.

We place residents at the heart of our organisation, and work to improve services and sense of community. We offer responsive, increasingly proactive, and personalised services to help our residents sustain their tenancies. We seek to build trust, understand the needs of our residents who may need extra support and enable them to build their lives with connection to community. We support placemaking and building sustainable communities.

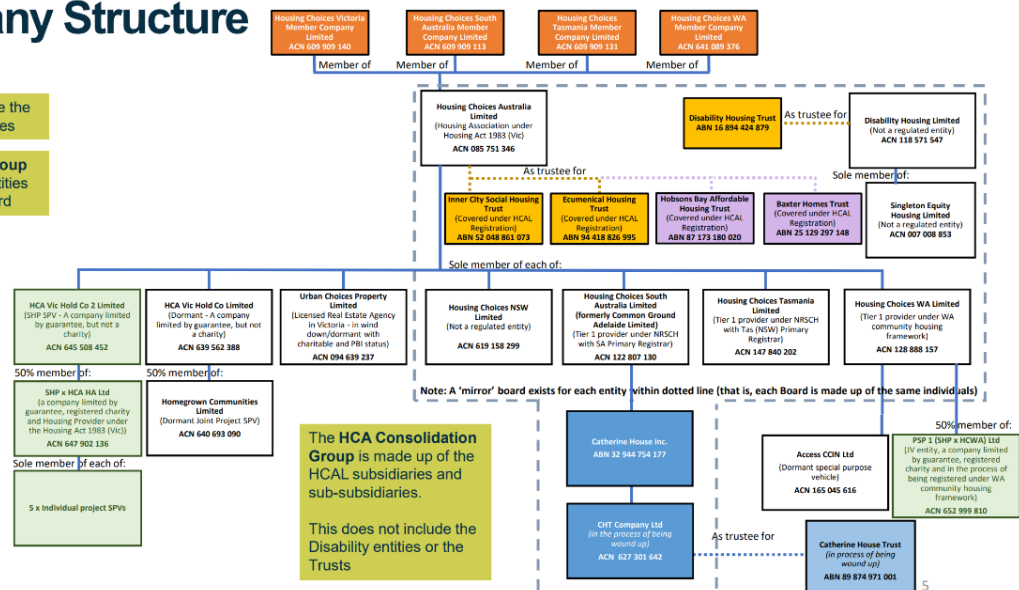
The organisation operates through a multi-layered entity structure, with Housing Choices Australia Limited serving as the parent entity overseeing several key subsidiaries, including Housing Choices Tasmania, Housing Choices South Australia, Housing Choices Western Australia, Housing Choices New South Wales, and Disability Housing Limited, and others. This structure allows for strong governance and oversight, positioning Housing Choices to address the housing needs of Australians on a national scale.

The HCA Group Structure at 30 June 2024

Company Structure

HCAL members are the 4 Member Companies

The overall HCA Group is made up of all entities with the 'mirror' board



Risks of Modern Slavery

For over 35 years, the HCA Group and its constituent organisations have been managing and developing community housing and housing services in partnership with governments, Not-for-Profit organisations and residents.

The HCA Group has a robust governance framework, with Board oversight augmented by delegated governance and risk subcommittees.

The HCA Group's governance practices are underpinned by key policies:

- Board; Audit Assurance and Risk Committee; and Governance, Appointment and Remuneration Committee Charters
- Code of Conduct
- Whistleblower Policy
- Fraud, Corruption and Misconduct Prevention Policy
- Risk Management Policy and Risk Management Framework
- Compliance Framework
- Procurement Policy
- Feedback and Complaints Policy

These policies support the HCA Group to operate with the highest standards of professional and ethical conduct within and by the group, to maintain full compliance with all legislative, regulatory and contractual requirements, including the prevention of modern slavery in relation to our business. A focus on positive compliance and on prevention and early identification of fraud, corruption or other forms of misconduct supports an environment in which staff, contractor and resident concerns can be safely raised and proactively addressed.

To provide additional assurance, the HCA Group maintains an internal audit program, run by the Risk Assurance and Regulatory Affairs team with the support of third-party auditors, which provides additional assurance on internal controls and compliance.

Whilst we consider the risk of participating in, supporting or enabling modern slavery to be very low, areas of vulnerability include contracted services such as cleaning and facility management, development activities and associated supply chains and procurement of whitegoods.

Group Values

Housing Choices is committed to meeting all our accreditation, community housing regulation and legal requirements. Driven by our compliance, risk management and quality practices, we work to achieve high levels of assurance.

Further, our corporate policies are written to ensure we are effective, compliant with our obligations and working to protect residents. We aim to run a robust, resilient and agile organisation, to help us best achieve our affordable housing mission.

The HCA Group is guided by our values:

- **We put people first.** People are central to everything we do. We listen and respond with open and honest communication and a flexible approach.
- **We work together.** We work collaboratively and in partnership to achieve our purpose.
- **We trust and are trusted.** We keep promises, are accountable and are transparent in our actions.
- **We learn and adapt.** We aim to inform the policy environment, support our actions with evidence, encourage innovation, and continually adapt to a changing environment.

Housing Operations and Support Services

Housing Choices Australia is committed to providing high quality, accessible and affordable housing for people who struggle to find a suitable home in Australia's challenging private rental market. We are one of Australia's largest developers of new social and affordable housing and provide ongoing professional tenancy management and asset management services for 7,505 properties and 13,166 residents to ensure everyone has a home which is well maintained, sustainable and suitable for a broad range of needs, now and into the future.

Homelessness programs, support services relating to disabilities and women's homelessness services are also central to our service offering to residents and clients.

All resident or client facing services are provided by staff employed by the HCA Group, with all staff employed under appropriate employment instruments, with payroll practices subject to an internal audit in 2023.

Business to whom we outsource services or with whom we partner are required to maintain full compliance with applicable laws, regulations and contractual obligations; are required to undertake inductions as appropriate (notably in relation to maintenance services); comply with relevant HCA Group policies and ensure the same is required of any subcontractors.

Property Development

Housing Choices is an experienced and award-winning social and affordable housing developer. Our organisation manages assets worth \$1.5 billion, owns \$1.3 billion in assets, and operates with an annual turnover of \$110 million. We have a highly successful collaborative approach working with a range of private and public stakeholders to realise our mission of increasing stock of good quality social housing for people on lower incomes, people with disability and key workers.

We offer full project management, design and construction, design management services including site assessments, planning assessments and housing yield analysis, cost planning and budget management, consultant engagement and preparation of contract documentation and tendering, building and construction management and project delivery.

As well as good homes, Housing Choices developments include vital community consultation and placemaking programs that enhance neighbourhood interaction and foster connection to place and between people established and new to neighbourhoods. We are committed to innovating new housing models and committed to exploring new ways of delivering more housing.

The HCA group's property development program is subject to Management, Board and Regulatory oversight, with the support of targeted internal audits. With the recent appointment of the General Manager Procurement, procurement controls are under review to further strengthen the HCA Group's control of its outsourcing and purchasing practices.

Supply Chains

The HCA Group procures goods and services to support its housing, support and development operations.

Development – related goods and services require the HCA Group's engagement with third party professionals, companies and governments. The HCA Group only engages with well-regarded businesses to minimize the risks of modern slavery within our supply chains.

The supply chain relating to community housing, Specialist Disability Accommodation and homeless and support services requires engagement with support providers (including Supported Independent Living Providers registered under the National

Disability Insurance Scheme), as well as significant outsourcing of responsive and planned maintenance required across the property portfolio.

The HCA Group aims to only engage with well-regarded and established suppliers and support organisations, spanning from local to international businesses, in line with internal procurement, delegations of authority and probity guidance and controls. While the risk of modern slavery associated with the management of these properties is generally considered low, the HCA Group is planning to undertake a more in-depth assessment of the risks in the supply chain in FY25, to support ongoing compliance with the Modern Slavery Act 2018 (Cth).

Supply chain risks have also been identified in relation to corporate procurement, which ranges from cleaning services to technology and solution purchases. Cleaning and facility management are the areas of greatest relative vulnerability, noting that the risk is mitigated by contracting only with well-regarded businesses.

Assessment of Modern Slavery Risks

The HCA Group is at the beginning of its Modern Slavery Journey. In FY25 the HCA Group will adopt a Modern Slavery Prevention Policy and undertake a full assessment of Modern Slavery risks throughout its supply chains and operations, with particular focus on areas of identified vulnerability.

Our role in combatting modern slavery

Housing Choices Australia (HCA) upholds the Australian Government's position on modern slavery. There is no place for modern slavery in the Australian community or in supply chains of Australian goods or services.

HCA can use its position to leverage over the conduct of suppliers and market practices to drive positive change to address modern slavery risks in the housing sector supply chains.

HCA is in early-stage establishment of a national Procurement function and framework including development of a Modern Slavery Risk Mitigation Program which aims to embed modern slavery risk considerations and mitigation actions in our end-to-end procurement cycle for our direct and indirect suppliers.

Consultation – current and future

The Modern Slavery Statement has been prepared by the Risk Assurance and Regulatory Affairs team, which works across all group entities and business units. This team manages risk, compliance, privacy, probity and regulation management with the support of all staff across the HCA Group. This body of work, which includes management of the internal audit program, ensures central oversight and engagement with all parts of the business.

Ahead of developing the FY25 Modern Slavery Statement, a Modern Slavery project group will be drawn together to support an in-depth assessment of the risks and the final FY25 Modern Slavery Statement. This will include engagement with management across the business, as well as staff engaged with specialist areas e.g. Procurement, Property Development and Maintenance and subsidiaries to support a grounded view of the Modern Slavery risks across the group.

Review of action effectiveness

While the risks of Modern Slavery are considered low across the HCA group's operations and supply chains, this will be assessed more formally in FY25, ahead of the next reporting deadline.

Approval

This statement was approved by the Board of Housing Choices Australia Limited and its entities.