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CARLISLE HOMES

MODERN SLAVERY STATEMENT 2020

Carlisle Homes submits this Modern Slavery Statement for the financial year ending 30 June 2020 and in accordance with the Modern Slavery Act 2018 (Cth).

This statement sets out the steps taken by Carlisle Homes to identify and address the risks of modern slavery within its operations and supply chains.

ABOUT US

Established in 2004, Carlisle Homes has constructed over 13,000 quality homes across Victoria and has evolved to become a market leader in new home building.

We are extremely proud to have been recognised as Victoria's Professional Major Builder for 2015, 2017 and 2020 at the HIA-CSR Victorian Housing and Kitchen & Bathroom Awards.

The HIA awards are rightfully regarded as the most prestigious awards in the home building industry and to have been recognised in the highest category is testament to our commitment to excellence in all that we do.

Our commitment to excellence extends beyond our customers and our product, to our wider corporate responsibility. We recognise the impact that our business has on other sectors and the importance of engaging in ethical business practices to reduce the risk of adverse impacts to human rights.

This Modern Slavery Statement sets out the steps taken by Carlisle Homes to identify and address the risks of modern slavery within its operations and supply chains in FY2020 and confirms our initiatives for FY2021.

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Carlisle Homes Pty Ltd is a privately owned, Victorian residential building company with approximately 480 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 and as such, we consider that the risk of modern slavery within our direct business operations to be low.

RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

Whilst we consider the risk of modern slavery within our direct operations to be low, we acknowledge that the construction industry is vulnerable to modern slavery practices and our risk lies within indirect and complex supply chains.

In particular, we note that building materials and products are often sourced from high-risk countries and therefore modern slavery may be evident in the manufacture and of such goods prior to importation into Australia.

Our initial scoping exercise has identified that we may be linked to modern slavery practices through the procurement of products and materials which include components sourced from countries vulnerable to forced labour.

ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

We have utilised the first reporting period as a foundation to establish and implement a roadmap for future reporting periods. In doing so, we have undertaken the following preliminary steps:

- **Established an Anti-Modern Slavery Working Group**

The Working Group consists of representatives from our Procurement, Human Resources and Legal Teams and will meet quarterly to monitor and report on all initiatives.

- **Engaged in high-level consultation with suppliers**

We have engaged with our largest suppliers to determine the actions those suppliers have taken, if any, to address the risks of modern slavery within their business. We are pleased to have identified that many suppliers were already aware of the issue and have their own Modern Slavery statements and policies in place.

FUTURE INITIATIVES AND ASSESSMENT

The Anti-Modern Slavery Working Group has identified the following future initiatives in order to identify, prevent and account for modern slavery risks:

- Engage in further consultation and collaboration with key suppliers:
 - Determine and prioritise 'high-risk' sectors
 - Implement a Supplier Code of Conduct
 - Review and update supplier and subcontractor contracts to require compliance with modern slavery legislation
 - Request information regarding sub-suppliers
 - Screen new suppliers for risks and track existing suppliers with internal audits
- Quarterly Working Group meetings to review and assess the actions taken
- Implement and share findings internally and with suppliers

Our progress in respect to the above initiatives will be reported on in our FY2021 Modern Slavery Statement.

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





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