

Modern Slavery Statement 2020

Our Business Operations

Creation Homes Victoria was founded in 2010 and operates in metropolitan Melbourne, specialising in building large scale full turn-key residential projects for external Teir 1 developers. Creation Homes is currently the largest residential builder of townhouses in Victoria. Our construction methodologies focus on quality, innovation, safety and on-time delivery.

For more information on Creation Homes Victoria visit www.creationhomes.com.au

Creation Homes supports the objective of eliminating modern slavery across Australia. It recognises that this term covers a number of practices including human trafficking, forced labour, child labour, force marriages, domestic servitude and other slavery-like practices. Creation Homes expects that its employees, suppliers and subcontractors support its initiatives and its commitment in ensuring that our business practices are free from modern slavery.

Our Supply Chain

Creation Homes Victoria operates solely in Victoria. Our supply chains include products and services utilised in the design, sale, construction and after-care of residential dwellings, including:

- our direct employees;
- specialised trades working under subcontractor agreements; and
- supply of goods and building materials utilised in the construction of residential dwellings.

Risk Assessment

Creation Homes has undertaken a risk assessment of its operations and supply chain to identify any risk of modern slavery. Based on this process, Creation Homes has assessed that it has a low risk of modern slavery within its operations.

Creation Homes adheres to all relevant fair work legislation to ensure the protection of its employees.

The business sub-contracts its building work to a large and diverse range of subcontractors. All these services are provided on our construction sites located in Victoria under Creation Homes' supervision. All these services are provided pursuant to Australia's industrial relations system and employment laws.

The business acquires all its building supplies domestically. We do not directly procure any products or materials from overseas, however a number of our suppliers have their own supply chains for raw materials and componentry which they may acquire from overseas. This extended supply chain is complex and is a potential risk area for modern slavery. When undertaking an assessment of our major suppliers who provide the majority of our goods, we were pleased to learn that these organisations have their own modern slavery statements in place and are undertaking their own assessments.

Due diligence and Remediation

To manage the risks of modern slavery in its supply chain, Creation Homes is implementing the following initiatives:

- Continuing to engage with our suppliers and subcontractors to further determine and refine 'high-risk' sectors;
- Updating our Procurement Policy within our Subcontractor Agreements to incorporate modern slavery requirements;
- Introducing a Supplier Code of Conduct;
- Further training of staff on the impacts and risks of modern slavery, through an internal training program. Creation Homes promotes its Whistleblower Policy and encourages staff to report any concerns of mistreatment without fear of retribution through their Managers or the Whistleblower Protection Officer;
- Introducing a questionnaire on Modern Slavery which is required for all new suppliers and existing suppliers; and
- Continuing to review our processes and explore ways to improve the identification of modern slavery within our supply chain.

Creation Homes is committed to raising the awareness of modern slavery. The business will continue to improve our monitoring and risk assessment procedures to prevent any contribution we may have to the issue of modern slavery.

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) and represents the Modern Slavery Statement for Creation Homes (Vic) Pty Ltd for the year ended 30 June 2020. This statement was approved by the Board of Creation Homes (Vic) Pty Ltd on 30 March 2021



Caroline Lamshed
COMPANY SECRETARY