

Modern Slavery Statement 2023



Our new artwork



“I’m a First Nations creative and proud descendant of the Samsep people from Erub Island in the Torres Strait,” says Alysha Menzel, who was commissioned by SGCH to produce the beautiful artwork *Connected Communities*, shown above.

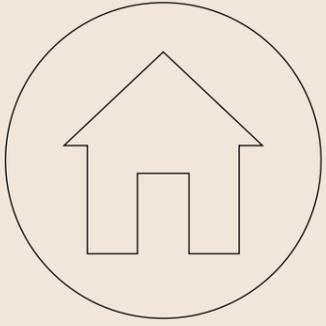
This design represents SGCH’s mission to provide sustainable, safe and affordable housing as a foundation for individuals to connect with opportunities and build their communities, says Alysha. “It also embodies SGCH’s vision, where every individual has the opportunity to flourish and contribute to the wider community’s growth and success.” In this design, the central circle feature element depicts our values. Its inner circle represents innovation and is shown as emanating out through everything we do. The various layers reflect our customer service approach and how we work together. The dotwork in the middle layer is a nod to accountability and SGCH’s responsibility to ensure our customers have the best opportunity to meet their needs and aspirations.

I think it speaks volumes about SGCH and its commitment to acknowledging and supporting First Nations culture and peoples.

— Alysha



Welcome



We acknowledge the traditional Aboriginal and Torres Strait Islander owners of the lands on which we operate and provide homes for people.

We acknowledge and pay our respects to past, present and future Aboriginal and Torres Strait Islander elders, peoples and nations. We recognise Aboriginal and Torres Strait Islander peoples as having the world’s oldest living, continuous culture with unique languages and spiritual relationships to the land and seas.

St George Community Housing (SGCH) is strongly committed to practical action aimed at building the physical, cultural, spiritual and family wellbeing of Aboriginal and Torres Strait Islander peoples through our role as a community housing provider.

We renew our determination to listen and to learn from Aboriginal and Torres Strait Islander peoples, to recognise the important contribution they make, and to offer a first-rate service that responds to the diversity of Aboriginal and Torres Strait Islander peoples and their communities.

Great places,
thriving people,
connected
communities.

Contents

Introduction	05
--------------	----

<u>01</u> Identification, structure, operations and supply chains	09
Our structure	10
Our operations	12
Our suppliers	13

<u>02</u> Risks	15
--------------------	----

<u>03</u> Actions and effectiveness	17
--	----

<u>04</u> Consultation	21
---------------------------	----

<u>05</u> From our governing body	23
--------------------------------------	----

Together we provide sustainable, safe and affordable housing as the foundation for our customers to connect to opportunities and build their communities.

Introduction

The Modern Slavery Act 2018 (Cth) (MSA) requires organisations with an annual consolidated revenue of more than \$AUD 100 million to identify and report on the risks of modern slavery in their operations and supply chains, and the steps taken to address, assess and manage these risks.

This Statement is submitted by St George Community Housing Limited (SGCH) under section 13 of the MSA to cover our third reporting period of 1 July 2022–30 June 2023.

Our commitment

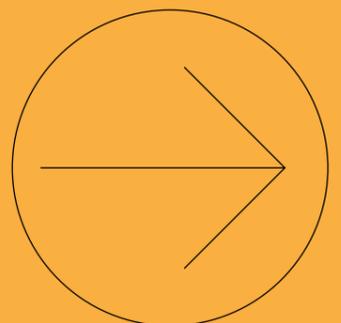
In all our actions we are intentional about making a positive impact. We are committed to understanding and fulfilling our responsibilities to our customers, staff, partners and the communities we operate in. This is our third Modern Slavery Statement.

The MSA includes within the definition of modern slavery activities such as trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour (situations where children are subjected to slavery or similar practices, or engaged in hazardous work).

We are opposed to all forms of modern slavery. We are committed to the principles outlined in the MSA, to being transparent about our operations and supply chains, and the steps taken to address risks. We recognise our responsibility as an organisation of scale and our ongoing role in educating our staff and working with our suppliers and partners to address modern slavery. We acknowledge the expectations of our customers and stakeholders to actively address risks. We acknowledge the diversity of our 11,400 customers and that past practices in Australia of slavery and forced labour have impacted Aboriginal and Torres Strait Islander peoples and Pacific Islander peoples in particular.

As part of our commitment to continuous improvement as an organisation, we welcome the opportunity to understand and develop our approach to addressing modern slavery risks with a focus on our governance, our impact and our culture.

We are proud to present our third Modern Slavery Statement, which outlines the steps we have taken this past financial year to develop our approach. We continue to build a framework that will assist us to adapt and progress our capabilities to more efficiently identify, assess and address these risks. We welcome feedback about this statement and expect to continually adapt our approach to demonstrate a growing awareness and improvement in our ability to address modern slavery risks.



Connected communities

- 1 Supported by SGCH, Bonnyrigg Youth Collective members took part in a two-day team-building camp at Lake Macquarie.
- 2 Bonnyrigg Under the Stars movie night was held in February. It's run by SGCH but the entire community is welcomed.
- 3 Our Metro North East region customers embraced art healing sessions.
- 4 SGCH staff were on hand to help Riverwood customers complete their 2023 Tenant Satisfaction Survey.
- 5 Our Greenway Wellbeing Expo was all about highlighting local services for customers—and offering them the chance to get to know each other in the process.
- 6 In conjunction with TAFE, SGCH currently offers customers in south-west Sydney the opportunity to undertake a Certificate IV in Horticulture.
- 7 The Marrabang Wagagee Aboriginal dance troupe from Bonnyrigg Public School performs at our 2023 Strive scholarships presentation ceremony.



Identification, structure, operations and supply chains



Our vision is great places, thriving people,
connected communities.

Together we provide sustainable, safe and affordable housing
as the foundation for our customers to connect to opportunities
and build their communities.

St George Community Housing Limited (SGCH) (ABN 32 565
549 842) is a Public Company limited by guarantee and a
charity registered with the Australian Charities and Not-for-
Profits Commission. The registered main office of SGCH is in
Hurstville, NSW.

SGCH was established for the public charitable object of
providing relief against poverty, distress and helplessness
in Australia by providing secure, affordable and sensitively
managed housing for people in need.

Our structure

SGCH Limited, the parent company, and its subsidiaries are registered with the Australian Charities and Not-for-profits Commission. These are SGCH Portfolio Limited, SGCH Sustainability Limited, SGCH DevCo Limited and SGCH Keys Limited.

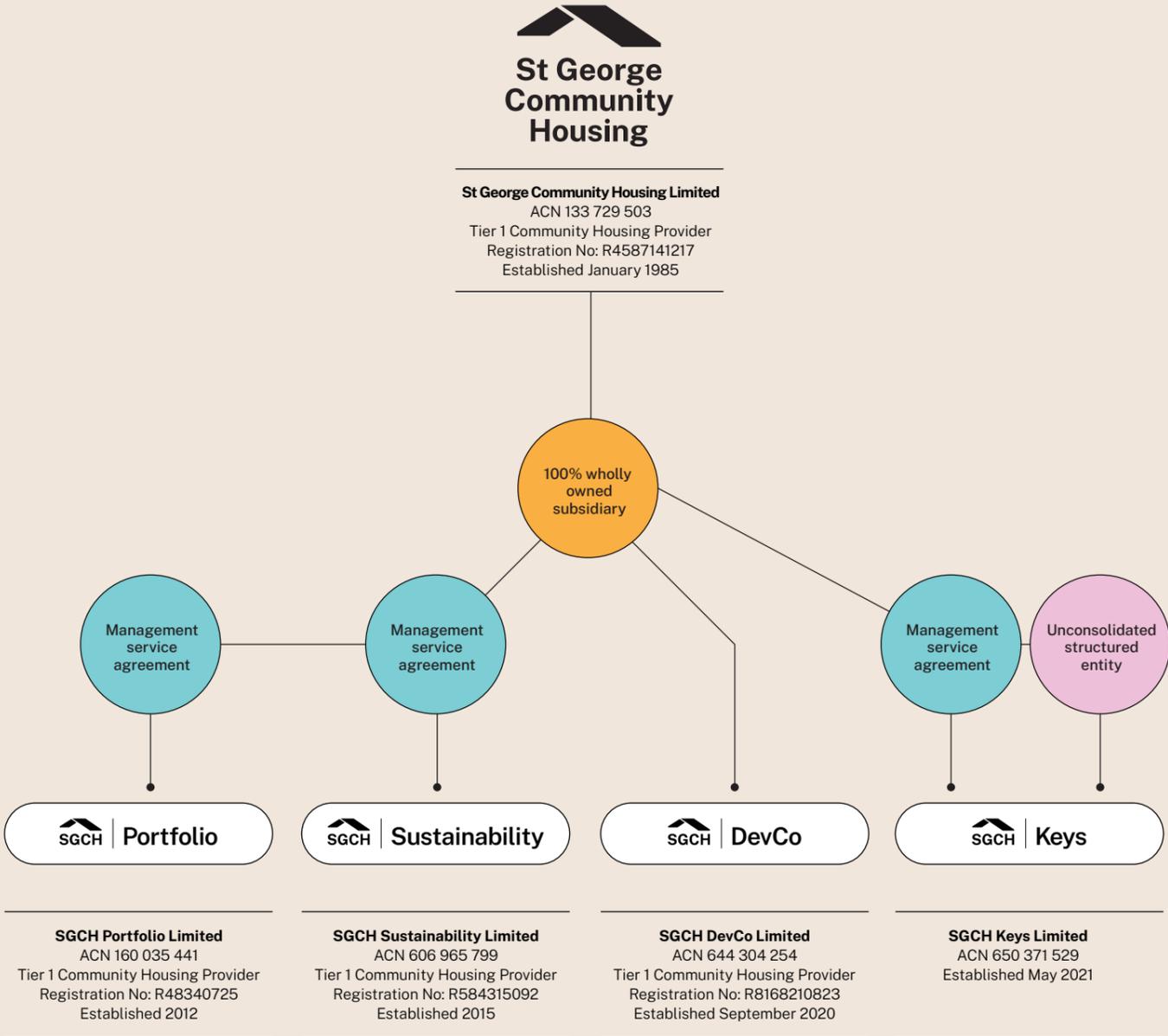
The four subsidiaries independently do not meet the reporting threshold under the Modern Slavery Act. However, each subsidiary adopts the same policies and processes, and shares the same supply chain. This Statement was created through collaboration between representatives of all business divisions.

The parent and subsidiaries SGCH Portfolio, SGCH Sustainability and SGCH DevCo are required to meet the governance standards and the performance outcomes mandated under the National Regulatory System for Community Housing, against which it reports annually to demonstrate compliance and maintain registration as a Tier 1 community housing provider. SGCH Keys is not registered in this system; it is an unconsolidated structured entity.

Our vision is great places, thriving people, connected communities.



Group structure diagram



Our operations

Founded in 1985, we now provide a place to call home for 11,400 people in 6,994 properties across the Sydney metropolitan region. We are recognised as a Tier 1 Community Housing Provider under the National Regulatory System for Community Housing. We bring capability and capital to work in partnership with governments, developers and builders, financiers and investors, community groups and individuals within the community.

Our team provides a range of corporate service functions including finance, human resources, information technology, communications, legal, governance and risk.

The majority of our assets are owned residential housing investment properties and rights of use assets in respect of residential leases. We also manage residential housing assets on behalf of the NSW Government, various local governments and other not-for-profit organisations. These property-based investments are all located in metropolitan Sydney and therefore we consider they pose a low risk in relation to modern slavery geographically. However, we are aware those same properties require management, repairs, maintenance, cleaning and associated activities and have discussed the risks these activities pose in relation to modern slavery (refer section 2. Risks).

We hold cash on deposit and short-term investments we use to fund our development pipeline, support our existing loans and working capital obligations. We invest strategically to grow our property portfolio and increase the impact we can have in the lives of our current and future customers. In future reporting periods we will look to assess whether we may have any exposure to modern slavery risks through our cash and short-term investments.

We own, manage and operate properties across 25 local government areas (LGAs) in the Sydney metropolitan area. Our operations consist of:

- Tenancy management
- Asset management
- Development and construction

Tenancy management

Our portfolio comprises a mix of social housing, transitional housing, affordable housing, key worker housing and specialist disability accommodation. We are recognised as industry leaders in tenancy management, with a practice that places tenant outcomes at the centre of our work.

We deliver tenancy management services through four functions:

- Allocations -new tenancies allocated in accordance with Housing Pathways
- Tenancy management -in accordance with the Residential Tenancies Act 2010 (NSW) and NSW Community Housing Policies
- Income management -all rent and income subsidy reviews in accordance with NSW Community Housing Rent Policy, and;
- Customer feedback -independent to ensure complaints and appeals are treated sensitively and fairly.

Asset management

For the purpose of facility operations and maintenance, our asset management portfolio is divided into two geographical regions and delivered in conjunction with third party multi-trade contractors.

Development

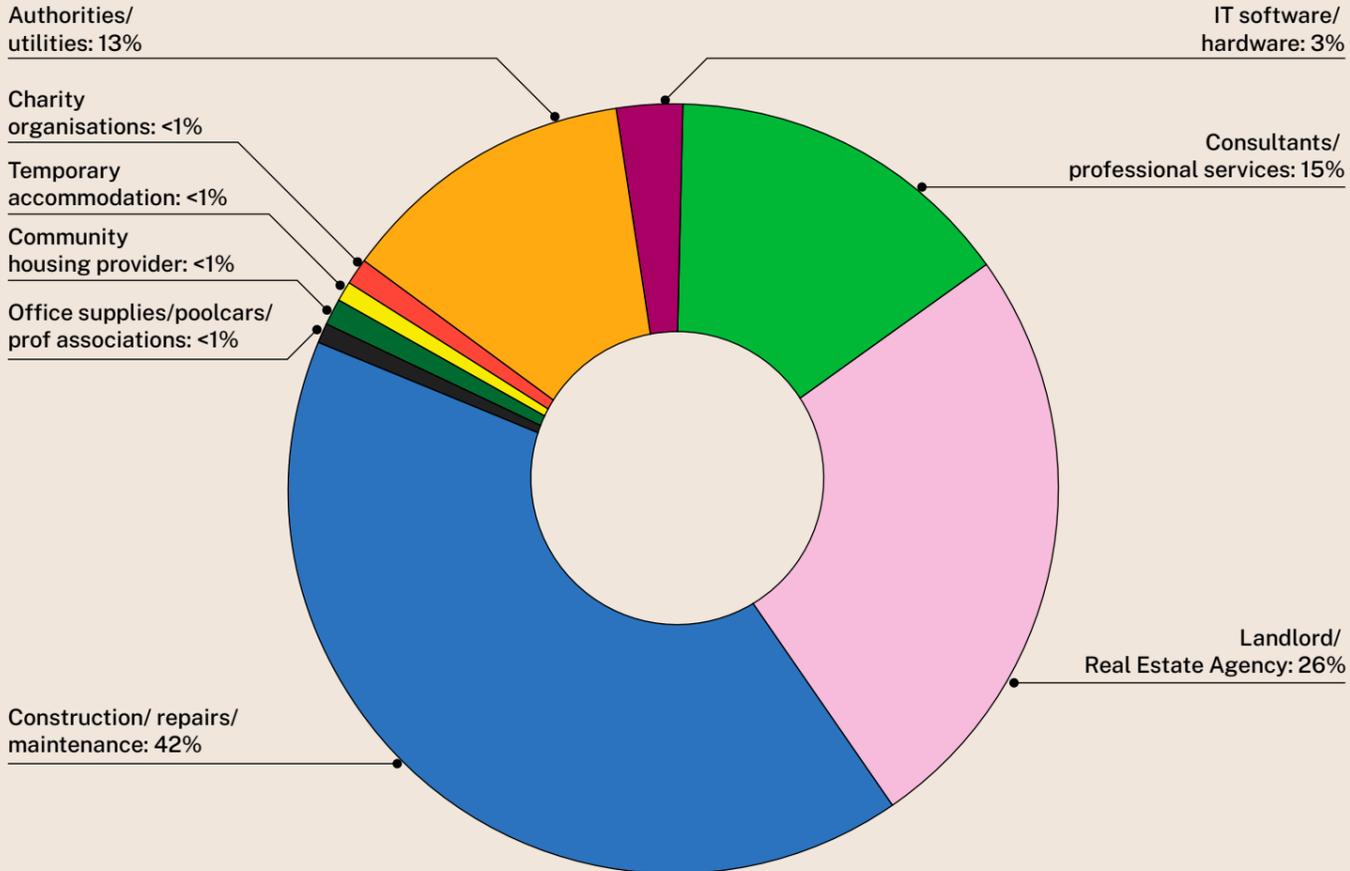
We have a dedicated in-house team experienced in development and project management, across residential and major urban regeneration projects. Our team works with a range of consultants, architects, builders and contractors to deliver our development pipeline.

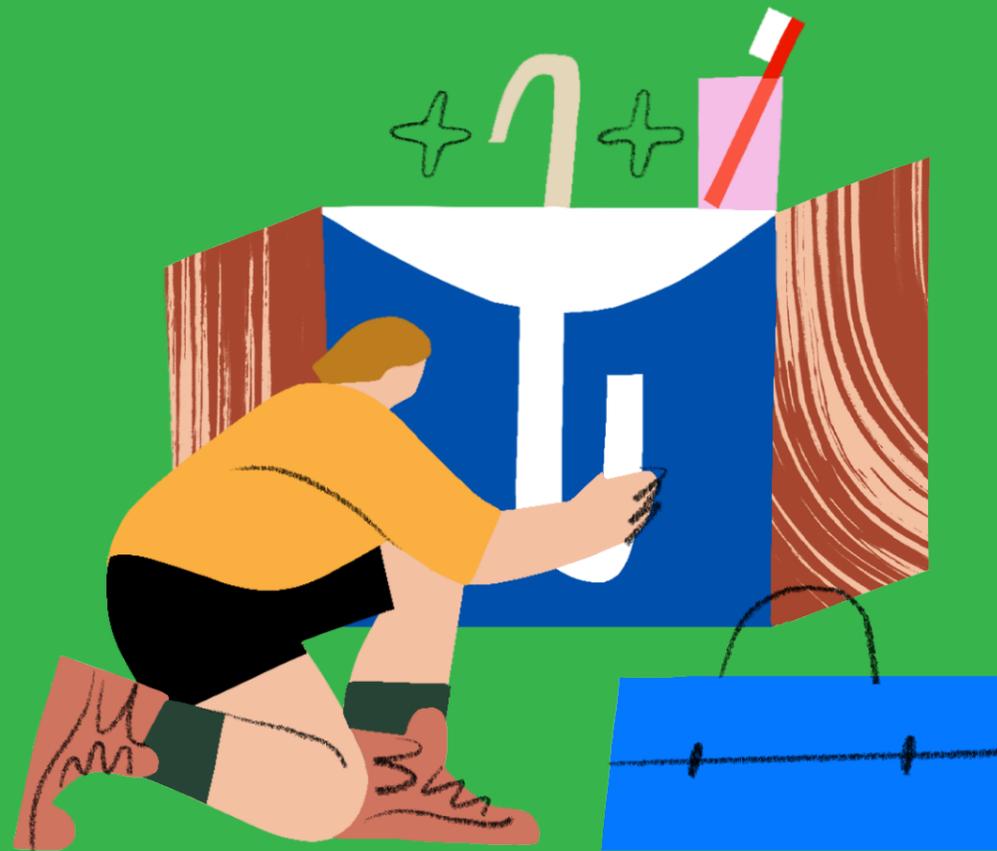
Our suppliers

Our Tier 1 supply chain is made up of approximately 800 suppliers. Tier 1 suppliers are those with whom SGCH directly contracts for the provision of goods and/or services. We acknowledge our supply chain extends beyond the first tier to include companies with which we do not have direct contractual relationships.

Due to operational constraints, such additional tiers of suppliers have not been considered in the preparation of this statement. Our Tier 1 suppliers are almost entirely based in Australia, with only a few of suppliers being based overseas in locations including the United States and Singapore.

Our Tier 1 suppliers include providers in the following categories (based on \$value):





We understand modern slavery is complex and exists in many forms. We know modern slavery exists in every country, including our own. We understand that the prevalence of modern slavery means that every entity has risks of modern slavery occurring within its operations and supply chains. We continually review our modern slavery risks in our supply chain. This review focuses on our higher risk Tier 1 operations and supply chains.

Operations

We understand modern slavery can impact many different individuals but there are some cohorts in our society that are more vulnerable to exploitation than others, and migrants and individuals with cultural and language barriers, children and women, less-skilled workers and those with financial difficulties are particularly vulnerable to modern slavery. A large cohort of our customer base are these same individuals and therefore may be particularly vulnerable to modern slavery. We note under the MSA we are not required to report on modern slavery risks associated with how our customers use our products and services. However, we recognise our interactions with this customer base as part of our operations may increase the risk we are linked to modern slavery.

Our Homes team works to build, renovate and repair houses, and we understand globally that a large proportion of modern slavery victims are found in the construction industry. We are also aware building materials are often sourced from high-risk geographic locations. The construction industry can involve high demand for less-skilled labour as well as long and complex supply chains with a high degree of subcontracting. Our participation in this industry is an area of higher risk for us.

Supply chains

We acknowledge 800 suppliers is a significant number of suppliers for an entity of our size and therefore requires increased diligence to maintain visibility over those suppliers to reduce the risk of modern slavery posed by each. It should be noted that approximately half of these suppliers are private lessors and real estate agents engaged by SGCH as part of the Community Housing Leasing Program.

On the Tier 1 supply chain mapping we have completed, we have identified overseas-based suppliers in locations including the United States and Singapore. We note neither of these locations are high-risk according to the literature and the Global Slavery Index, however given the Singaporean suppliers are in a higher risk location than Australia we will continue to review those suppliers further in future reporting periods. The remaining suppliers are based in Australia, which is a low-risk location.

We also have some suppliers that operate in higher-risk industries, or with higher-risk goods and services, including suppliers of information technology software and hardware; building and construction; repairs and maintenance; security and cleaning services; stationery and furniture; embroidery and uniforms; and groceries and catering. We recognise use of recruitment agencies may lead to reduced visibility over our own workforce and the different conditions and circumstances attached to our workers' employment.

We will continue to learn more about our supply chain, in particular secondary tiers of suppliers, in order to assist in increasing accuracy in risk identification in future reporting periods.

Actions and effectiveness



We continue to make a concerted effort to address and assess the modern slavery risks we identify in our operations and supply chains, and to assess the effectiveness of the actions we take in this space. We have adopted a continuous improvement approach and aim to build on our capabilities each year.

Operations

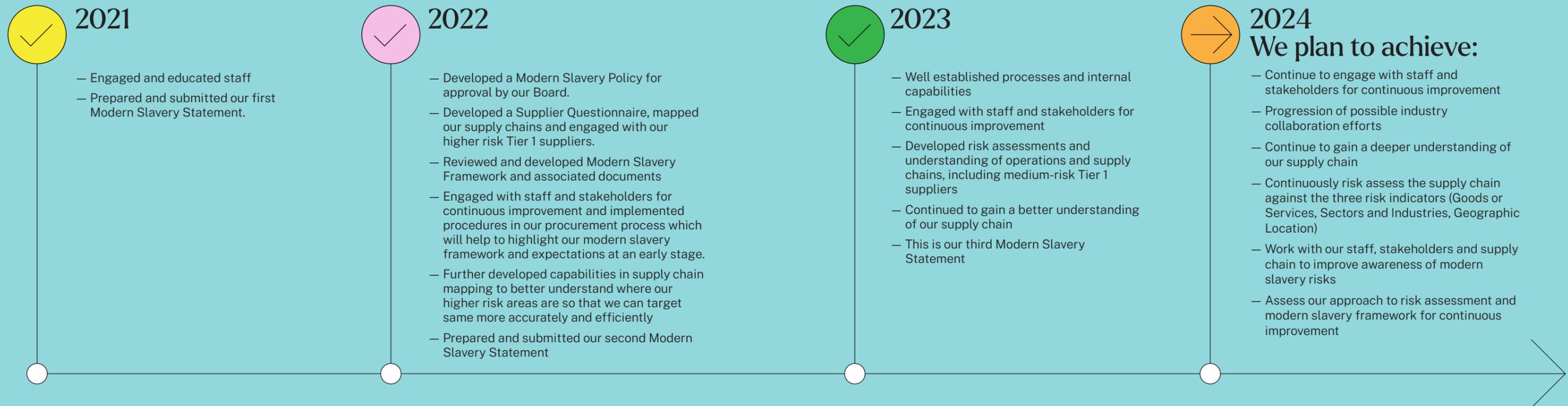
We are committed to complying with all Australian workplace laws including the Fair Work Act 2009 (Cth). Our employees are provided with employment contracts detailing the conditions of their employment and their various rights and obligations.

We will continue to develop modern slavery workshops with key staff members, guided by external experts, in which we educated staff about the MSA and modern slavery and we developed plans and strategies in this space. The Board approved a three-year initial strategy to address modern slavery risks in our operations and supply chain and to meet our annual reporting obligations.

Our strategy involves various targets which we will continually review for effectiveness. The Board is kept regularly updated on progress of our modern slavery initiatives.

Our approach to managing the risk of modern slavery in our procurement processes is based on the principles of our Risk Management Framework. This Framework applies a consistent approach to assessing and treating risks once they are identified and is aligned with AS ISO 31000:2018 Risk Management -Guidelines.

What we have achieved to date



Policies and procedures

We have drafted a Modern Slavery Policy, developing our modern slavery framework and associated documentation and tools. We have included modern slavery clauses in our multi-trade contractor contracts.

We also have multiple other current policies that inform our approach to our culture and the protection of our workforce, suppliers and customer base including:

- Care and Protection of Children and Young People Policy
- Contractor Management -Workplace Health and Safety Responsibilities Policy
- Directors Code of Conduct
- Drug and Alcohol Policy
- Notifiable Incidents Policy
- Procurement Policy
- Responsive Maintenance Policy
- Risk Policy
- Sharing Information with Police Policy
- Violence and Abuse Prevention Policy
- Volunteers Policy
- Vulnerable Tenants and Occupants Policy

- Whistleblower Policy
- Workplace Behaviour Policy, and;
- Work Health, Safety and Wellbeing Policy.

We also have a Code of Conduct and Ethics which explains the minimum standards of behaviour that we expect from our staff including the use of our corporate values to make decisions that align to our purpose.

We understand that the nature of modern slavery is such that many victims are unable to draw attention to their circumstances for fear of retribution and hence it is often hidden. We have a Whistleblower Policy which sets out the circumstances around protected disclosures in our business and encourages the reporting of particular matters including corrupt conduct, criminal or illegal conduct and unethical or other serious improper conduct. We have a number of Whistleblower Protection Officers, an independent external whistleblower reporting service to receive reports, and we encourage people to report actual or suspected misconduct.

Supplier Modern Slavery Protocol

We continue to engage with our suppliers about modern slavery.

In the 2024 period, we will progress development of a Supplier Modern Slavery Protocol (the Protocol) which we will aim to roll out over the coming reporting period.

We will, wherever possible, choose to partner with suppliers who support and strengthen our response to modern slavery. The Protocol refers suppliers to a number of relevant laws and guiding materials including:

- Fair Work Act 2009 (Cth)
- Modern Slavery Act 2018 (Cth)
- Modern Slavery Act 2018 (NSW) –for NSW Government Authorities
- Australian Criminal Code Act 1995 (Cth)
- Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy’ Framework
- Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, and;
- ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.

The Protocol seeks to also educate suppliers on the definition of modern slavery and requires that they comply with various laws and instruments, as well as our expectations in relation to their own risk assessments and due diligence processes.

The Protocol allows us to audit our suppliers and requires that suppliers provide for safe reporting mechanisms in this space. Suppliers are informed that referral action to proper authorities will be taken in cases involving breaches of the criminal law.

Supplier Contracts

In the 2023 period, we have reviewed our current contract templates to ensure our suppliers meet our expectations in the space of modern slavery including providing us with the information we require to ensure our own compliance with the MSA.

Supplier Questionnaire

We continued our review of higher-risk Tier 1 suppliers to either complete our supplier questionnaire or we reviewed their statement, which allowed us to further identify and assess the risks of modern slavery within our supply chain. After our review, we confirmed we were happy with the response or statements of approximately 90% of our higher risk Tier 1 supply chain. We are working with the final 10% to either clarify their response to our questions or assist them with awareness of and compliance with modern slavery legislation.



This third Statement is provided on behalf of SGCH Group, which wholly owns four subsidiaries. The four subsidiaries share the same directors, executive teams and employees as SGCH.

Each subsidiary adopts the same policies and processes and shares the same supply chain. This Statement was created through collaboration between representatives of all business divisions.

From our governing body



SGCH makes this Statement in accordance with section 13 of the Modern Slavery Act 2018 (Cth). SGCH's Board of Directors is its principal governing body for the purpose of the Modern Slavery Act 2018 (Cth). This Modern Slavery Statement was considered and approved of by the Governing Board of SGCH on 25 August 2023.

A handwritten signature in black ink, appearing to read 'K Orvad'.

Karen Orvad

Chair of the Board of Directors of SGCH
Responsible Member of SGCH's Principal
Governing Body



Modern Slavery Statement 2023

Published 08/12/2023

SGCH

Level 5, 38 Humphreys Lane
Hurstville NSW 2220

PO Box 348
Hurstville BC NSW 1481

1800 573 370

communications@sgch.com.au
sgch.com.au

Great places,
thriving people,
connected
communities.

