

Modern Slavery Statement – Financial Year 2024

About us

Rivergum was established in 1994 by founder and Managing Director, Victor Said, the award-winning company is an industry leader renowned for innovative design, exceptional quality, affordability and a commitment to excellence.

Today, Rivergum is arguably South Australia's most progressive builder, offering a range of homes specifically designed for metropolitan and recreational needs constructed in timber or steel frame, lightweight clad or brick veneer construction.

Its expertise extends to volume construction of medium-density and master-planned housing, while our track record as a preferred builder partner for Tier 1 developers, Government and public housing providers is something of great pride.

Structure, Operations and Supply Chain

This statement is in relation to entity Rivergum Homes Group (Aust.) Pty Ltd and its controlled entities (ABN 62 074 736 762) (Rivergum). Registered head office is 387-391 South Road Mile End South, South Australia 5031. The group employs approximately 100 staff.

Our operations

Rivergum is based in Adelaide, South Australia, with its core operations focused on the metropolitan Adelaide area. The company consists of two main divisions. The first division serves retail customers, specialising in the construction of detached homes, primarily single story dwellings. The second division, Rivergum Projects, is the largest projects builder in South Australia by volume, providing a range of building services as a builder, builder/developer, and developer for both single and double story detached and semi-detached homes.

Rivergum operates exclusively within Australia, utilising local suppliers, contractors, tradespeople, and employees to deliver high-quality residential homes.

Supply chain

The supply chains involved in the construction of single and double story detached and semi-detached housing encompass a diverse range of subcontractors, including, but not limited to, concreters, carpenters, bricklayers, roofers, plumbers, electricians, plasterers, and painters. In terms of direct and indirect procurement of materials, this includes items such as concrete, bricks, timber, cladding, windows, plasterboard, flooring, household appliances, and fixtures and fittings. Additionally, professional service firms are engaged throughout this process, including those specialising in planning, drafting, and engineering.

To support the head office and operational staff, the supply chain also includes office consumables, uniforms, promotional and marketing materials, technology (hardware and software providers), and other professional services firms.

All our subcontractors are based in Australia, and the majority of our suppliers are also headquartered in Australia, with no goods or raw materials being sourced directly by Rivergum from overseas suppliers.

Risk assessment of operations and supply chains

Rivergum's primary supply chain and operational components consist of subcontractors, suppliers, and professional service firms. Risk assessments have been conducted across these categories to evaluate any potential risk of modern slavery practices

- Subcontractors: A broad range of subcontractors and trades are engaged both directly and indirectly to perform the required work at market rates. All these vendors are locally based in Australia.
- Suppliers: All materials are sourced from suppliers based in Australia, with no direct procurement from offshore companies. This applies to building materials, office supplies, and other resources essential for the business's operations. Some of our direct suppliers operate their own complex and diverse supply chains, which may extend beyond Australia's borders, these extended supply chains could pose potential risks related to modern slavery, for example timber products.
- Professional Services Firms: A variety of professional services are engaged during both the pre-construction and construction phases, the majority of which are locally based. A small portion of work is outsourced to offshore vendors and performed by professional services firms.

Rivergum has thoroughly assessed the risks that could potentially cause, contribute to, or be directly linked to modern slavery practices. Based on our evaluations, we have determined that the risk of modern slavery within our supply chains is no to low risk.

Risk Mitigation

Our objective is to ensure that our employees, suppliers, agents, subcontractors, and partners prioritise human rights and are committed to sourcing labour, materials, and products in a sustainable, ethical, and responsible manner. We maintain a zero-tolerance policy toward any form of behavior or actions associated with modern slavery.

Rivergum's policies and practices emphasize the procurement of goods and services primarily from local sources, which effectively mitigates the risk of modern slavery within our operations and supply chains. For suppliers with more complex supply chains, we seek to engage large national companies who have their own modern slavery statements, ensuring they are actively assessing and addressing potential risks of modern slavery within their operations and supply chains.

Our actions

Rivergum has undertaken a number of initiatives throughout the year to ensure that there is a no to low risk of modern slavery practices occurring in our operations and supply chain, which include:

- Increasing awareness of modern slavery risks amongst the management team;
- Assessing the risks of modern slavery throughout our operations and supply chains;
- Engaging with key suppliers, particularly those with overseas operations and greater than \$100m turnover to understand how they are addressing modern slavery risks;
- Following our procurement model of sourcing goods and services from local companies in the majority of circumstances. This allows Rivergum to maintain its most effective response to ensure modern slavery practices are adhered to and that the appropriate resources are selected;
- Reviewing our subcontractor induction pack which includes code of conduct, work health and safety policy, site specific WHS management plan, health and safety induction, to understand if modern slavery requirements are appropriately covered; and
- Continuing to ensure that subcontractors, consultants and staff are paid market rates of pay

Future actions

Rivergum has identified the following key future actions which it will focus on in the coming reporting period:

- Continue to improve staff and management awareness of modern slavery risks through awareness-raising and training;
- Introduction of an online platform that manages all our subcontractors, making it easier for subcontractors to formally acknowledge their induction pack and answer questions in relation to modern slavery;

- Through our procurement processes communicating our expectations to suppliers around modern slavery and understanding how they are addressing modern slavery in their supply chains;
- Including modern slavery considerations in our supply agreements going forward.

Assessing effectiveness of actions

In order to assess the effectiveness of our actions Rivergum will:

- Establish an annual senior management review of Rivergum's response to modern slavery and progress achieved;
- Ensure that modern slavery is assessed regularly by the senior management team to understand if the risk profile has changed;
- Tracking the progress of actions planned and actions taken; and
- Working with higher risk suppliers to understand how they are progressing any actions they have put in place to address modern slavery risks

Consultation process with group entities

The Rivergum group entities consulted with one another to develop this Modern Slavery Statement. This involved review and feedback from the Managing Director, Chairman of the Board, Chief Financial Officer, General Managers and Head of People, Culture and Safety which represents all entities in the Rivergum group.

Any other relevant information

No other information to disclose.

This statement was approved by the board of Rivergum Homes Group (Aust.) Pty Ltd on Thursday 19th December 2024.

Signed



Victor Said
Managing Director