



METRICON

Modern Slavery Statement - Financial Year 2022

Revised 11th Jan 23 (page 13 "Consultation process with owned entities" paragraph, to better clarify the process undertaken)



*This statement covers the activities of
Metricon Homes Pty Ltd (ACN 005 108 752)
ATF Metricon Homes Unit Trust (ABN 55 201
276 124) and Metricon Homes Queensland
Pty Ltd (ACN 005 149 137) ATF Metricon
Homes Queensland Unit Trust (ABN 94 858
933 773) and their controlled entities.*

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MODERN SLAVERY STATEMENT

Introduction

Introduction

Modern slavery is a significant global concern and in the broadest sense, incorporates any circumstance of exploitation, including, but not limited to, slavery, servitude, forced labour, child labour, human trafficking, abuse of power, threats, withholding of wages and deprivation of freedom.

This statement is made pursuant to the requirements of the Australian Modern Slavery Act 2018, for financial year ending 30 June 2022.

Metricon prides itself on steady corporate governance and supports the objectives of the Act. Metricon believes that issues of modern slavery must be addressed, and doing so aligns with our mission, vision, purpose and values.



MODERN SLAVERY STATEMENT

Our Business

“To be the best home building company in Australia, ever.”

Our Business

We have a proud history of building quality homes for Australians since 1976. Our unwavering dedication to excellence has helped us become Australia’s market leader.

Our vision is “to be the best home builder in Australia, ever!” which drives everything we do; from a friendly greeting at our display centres, our volunteering and social responsibility programs that give back to our communities, providing a workplace free from discrimination and harassment, right through to our supportive and transparent supplier relationships.

Metricon was awarded Australia’s number one residential builder in 2022 for the seventh consecutive year by the Housing Industry Association (HIA), with a total of 5,969 new home starts across Victoria, New South Wales, Queensland and South Australia.



MODERN SLAVERY STATEMENT

Our structure, operations and supply chain.

Our structure, operations and supply chain

This statement covers the activities of Metricon Homes Pty Ltd, ATF for Metricon Homes Unit Trust, Metricon Homes Qld Pty Ltd ATF Metricon Homes Queensland Unit Trust, and their controlled entities. Metricon Homes Unit Trust owns Building College Australia Pty Ltd; Newfield Real Estate Pty Ltd and Australian Building Company Pty Ltd. Metricon Homes Queensland Unit Trust owns Australian Building Company Queensland Pty Ltd.

As at 30 June 2022, Metricon had approximately 2,100 employees, 3,400 trade contractors and 3,000 suppliers (both direct and indirect) across Australia.

For the purposes of this statement, our key operating entities and operations and the associated supply chains are as follows: *(next page)*



MODERN SLAVERY STATEMENT

Our structure, operations and supply chain.

Entity	Main Operations	Supply Chain
Metricon Homes Pty Ltd	<ul style="list-style-type: none"> • Designs, markets and constructs low-rise residential dwellings on customers' land, or as part of a house and land package, in VIC, NSW and SA. • Owns display homes, and land for future display homes in VIC, NSW and SA. • Purchases lots in VIC, NSW and SA for on-sale to house-and-land package customers. • Assists customers with the provision of finance via brokers 	<ul style="list-style-type: none"> • Office consumables and uniforms. • Promotional and marketing materials. • Technology (hardware, software, cloud services). • Utilities • Professional services consultants/organisations/contractors, including recruitment firms, law firms, agents, engineers, building surveyors, designers, and IT and HR professionals. • Labour hire firms in Australia, Vietnam, Philippines, Malaysia and India (including drafting, estimating and IT professionals)
Metricon Homes Qld Pty Ltd	Same as above, but in QLD and northern NSW	<ul style="list-style-type: none"> • Sub-contractors who work on home construction, including arborists plumbers, electricians, gasfitters, drainers, tilers, carpenters, cleaners, excavators, painters, concreters, traffic management, bricklayers, plasterers, caulkers, levellers, sanders, renderers)
Australian Building Company Pty Ltd	Same as above, but in VIC, NSW and SA, under the ABC brand	<ul style="list-style-type: none"> • Home construction goods and materials (including soil reports, land surveys, energy assessments, CCTV, power pits, bins, tanks, pumps, paint, concrete, rock, steel, timber, joists, roof trusses, beams, lintels, bricks, hebel, cranes, waterproofing, windows, door frames, doors, bricks, brick sand, eaves material, fascia gutter, flashings, tiles, roofing, floor material, cladding, lock up material, mouldings, screens, insulation, sisilation, plaster, fixing material, basins, sinks, cabinetry, benchtops, cooking and kitchen appliances, dishwashers, heating, cooling, vacuum systems, plumbing units, hot water units, rangehoods, stairs, lights, stone, wallpaper, mirrors, shelves, electronic systems, baths, showers, sanitaryware, electrical fittings, antennas, fit off materials, carpets, balustrades, caulking, clotheslines, decks, letterboxes, fencing, flyscreens, window furnishings, scaffold, guard rails, generators, retaining walls).
Australian Building Company QLD Pty Ltd	Same as above, but in QLD, under the ABC brand	
Newfield Real Estate Pty Ltd	Licensed Real Estate Agent, for the purpose of selling house-and-land packages to customers	
Building College Australia Pty Ltd	Registered training organisation. Designs and delivers onsite and classroom-based building training in the residential building industry	

MODERN SLAVERY STATEMENT

Potential risks in our operations and supply chains.

Potential risks in our operations and supply chains

In 2022, Our Modern Slavery Working Group undertook a review of potential modern slavery risks across our operations, supply chains and vendor categories.

We considered risks that may possibly cause, contribute and/or be directly linked to modern slavery practices, in accordance with the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities.

Resultantly, Metricon has deemed the following as having no or low risk:

- Direct employee activities and internal processes
- Our engagement with professional labour hire firms in Australia, Vietnam, Philippines, Malaysia and India due to being larger, skilled, professional services firms.
- Our site-based sub-contractors, e.g., where our sub-contractors further sub-contract out, workers are working on Metricon sites, and any potentially underpayment of those third parties does not constitute modern slavery.

Some of Metricon's materials suppliers have been identified as potential risks, e.g., where Metricon's local suppliers source products and components from overseas sources, who in turn have modern slavery issues. The next section below details the measures taken to address these risks.



MODERN SLAVERY STATEMENT

Assessing and addressing risks, due diligence, remediation, and assessing effectiveness of actions.

Assessing and addressing risks, due diligence, remediation, and assessing effectiveness of actions

Our objective is to ensure our employees, suppliers, agents, sub-contractors and other associates place significance on human rights and sourcing labour, materials and products in a sustainable, ethical and responsible manner. Any behaviour or actions under the broad sense of modern slavery will not be tolerated.

To facilitate this, we have:

1. Risk & Compliance Centre of Excellence

Led by our Head of Audit, Risk & Process Improvement, this committee is responsible for managing enterprise risk and compliance and prepares Metricon's annual Modern Slavery statement, and reports through to the Board of Directors.

Assessing effectiveness: metrics are tracked of enterprise risks opened versus closed, risks not actioned, in progress or mitigated, as well as the action being taken to address each risk.

2. Modern Slavery Working Group

Cross functional working group led by Head of Audit, Risk & Process Improvement, involving Legal, Finance, Procurement, OHS, People & Culture. This group meets as required to identify and assess any potential modern slavery risks, and resolve, escalate and monitor any such risks.

Assessing effectiveness – audits are performed ensuring all measures required to be implemented by the working group have been completed, as well as the success of those measures.

MODERN SLAVERY STATEMENT

Assessing and addressing risks, due diligence, remediation, and assessing effectiveness of actions.

3. Code of Conduct

Promotes ethical and legal business conduct.

Assessing effectiveness – metrics are tracked of completion rates of mandatory staff sign off on the Code.

4. Metricon Integrity (Whistleblower) Policy and Program

Supported by a third-party disclosure services provider, allowing disclosures to be made anonymously, with a fair, objective and confidential investigation process by qualified personnel. Also published via Metricon's external website.

Assessing effectiveness – metrics are tracked of volume of disclosures made and closed, as well as completion rates for mandatory staff training on the program.

5. Procurement and Building Centre of Excellence

Led by our General Manager of Building and Operations, this national committee administers our National Procurement Policy and vendor selection, and governs direct and indirect supplier agreements, all of which mandate compliance with laws, regulations, safety, ethics and environment. The committee also conducts regular category reviews and manage vendor/sub-contractor key performance indicators (KPIs), including adherence to laws and ethics.

Assessing effectiveness: metrics are tracked of successful execution of each required action item of the Centre of Excellence.

MODERN SLAVERY STATEMENT

Assessing and addressing risks, due diligence, remediation, and assessing effectiveness of actions.

6. Subcontractor and Independent Contractor Working Group

Led by Head of Audit, Risk & Process Improvement, involving Legal, Finance and People & Culture, this group ensures all contractors have completed a prequalifying as well as annual questionnaire, and have agreements requiring compliance with laws and ethics.

Assessing effectiveness: 100% of contractors are reviewed annually, ensuring all have completed a questionnaire and have an agreement in place.

7. Vendor selection

Modern slavery has been specifically built into national vendor selection criteria, for direct and indirect spend categories, and a modern slavery questionnaire is required to be completed by all new vendors prior to onboarding.

Assessing effectiveness: audits are conducted of whether modern slavery has been considered for all new vendors onboarded.

8. Vendor agreements

Modern slavery clauses have been built into our direct, indirect, sub-contractor and independent contractor agreements.

Assessing effectiveness: agreement templates are audited to ensure clauses exist across all templates.

9. Vendor questionnaires

An annual modern slavery questionnaire is sent out to all suppliers and higher risk sub-contractors, requiring vendors to describe their modern slavery risks, and how they assess and mitigate any such risks, amongst other questions.

Assessing effectiveness: responses are tracked with a target of a 100% vendors response rate. An internal assessment is made as to the quality and content of responses provided, as well as any risks that have been identified within vendor responses.

MODERN SLAVERY STATEMENT

Consultation process with owned entities & Impact of COVID-19.

Consultation process with owned entities

All of Metricon's related entities are 100% held within the group under common directorship, therefore, the implementation of all modern slavery processes and governance, as well as the preparation of this statement, has been done in conjunction with all owned entities.

Impact of COVID-19

In April 2020, the Australian Border Force issued an information notice asking businesses to consider the impacts of COVID-19 on modern slavery risk mitigation and to provide comment in the Modern Slavery Statement.

Generally, our operations and supply chains remained resilient and strong during the reporting period. We implemented comprehensive COVID-19 safe procedures and guidelines on worksites and in our offices, Studios and Display Homes, comprising of social distancing, personal screening, hygiene measures and shutdowns where required.

MODERN SLAVERY STATEMENT

Future commitments and continuous improvement.

Future commitments and continuous improvement

Over the next year, we will continue reviewing whether any improvements are required to the measures described in 'addressing risks' section above, as well as continuously looking for new ways to mitigate modern slavery risks.

Metricon's Modern Slavery statement was approved by its Board on behalf of the Metricon Group on 1st December 2022.



Peter Langfelder
Chief Executive Officer - Metricon Group

