



BUILD WITH CONFIDENCE

MODERN SLAVERY STATEMENT

PERIOD ENDED 31 DECEMBER 2024







REPORTING

This statement was approved by the board of Eden Brae Holdings Pty Ltd (“Eden Brae”), the ‘Reporting Entity’ pursuant to Section 16(1a) of the Modern Slavery Act 2018.



Todd Symons
Company Director

May 2025

Date

BUSINESS FRAMEWORK

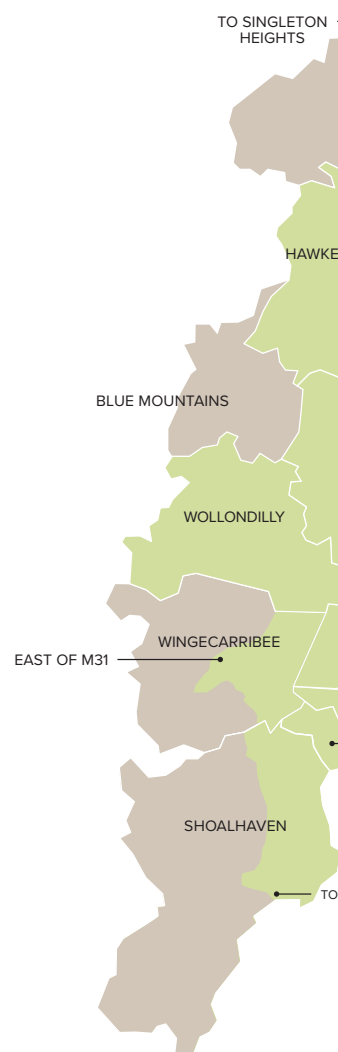
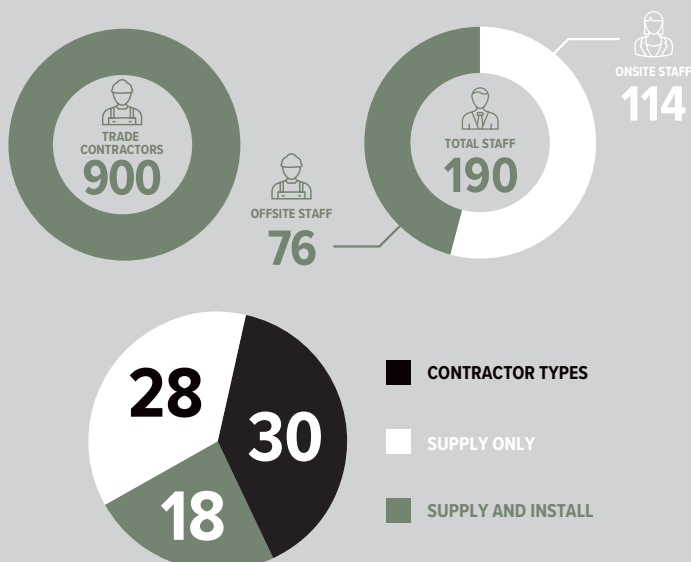
Eden Brae is a privately owned Australian residential builder operating in NSW. We undertake construction in an area including Sydney metro and expanding to the Central Coast, Newcastle and Hunter regions in the north, and to the Illawarra in the south.

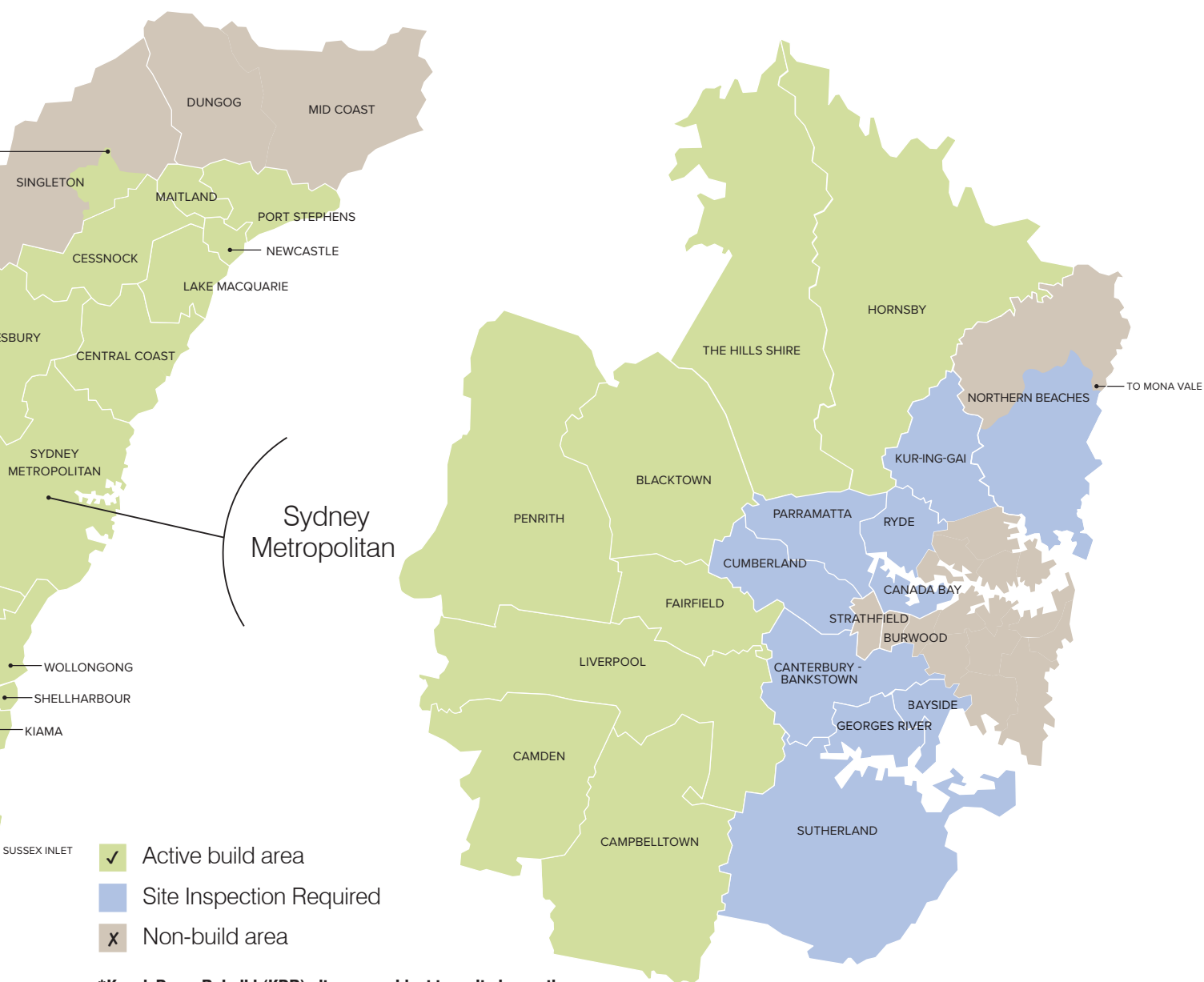
Eden Brae has two administrative bases: the head office in Sydney, and satellite office in the Hunter Region of NSW. Eden Brae is comprised of a number of specific teams, including marketing, sales, construction management, and support services. Eden Brae is supported by a strong network of sub-contractors, who perform direct works on site. Construction is overseen by a team of Eden Brae site supervisors, and contractor/material procurement managed through an online management system. Contractors are allowed to subcontract works further, but only when specifically approved by Eden Brae. This ensures that all workers and suppliers are overseen directly by Eden Brae Homes.

Eden Brae Homes has no ownership or direct involvement with any other party in its supply chain.

All suppliers and contractors engaged are sourced within Australia, where Australia has a low prevalence index rank (PIR). Where possible, materials are sourced within Australia.

PERSONNEL OVERVIEW







RISK OF MODERN SLAVERY

Eden Brae's core modern slavery risks include the potential of sourcing materials which have been manufactured or sourced from groups, countries, or regions where unethical labour standards or other unconscionable practices occur, and modern slavery in terms of work conditions for local workers/subcontractors.

In particular, products supplied by third parties could be sourced externally to Australia, which increases the risk of modern slavery occurring in these supply chains which makes these the ongoing focus/consultation with suppliers.

As our business engagement profile is primarily local contracting businesses (with a labour focus) who are based in Australia, our prevalence rating is low. Our existing contractor selection and ongoing performance processes mitigate the risk of modern slavery occurring within these business inputs.

FY2024 HIGHLIGHTS



Further developed internal risk assessment to map and assess modern slavery risk across our supply chain.



Continued Internal education for internal staff and external contractors and suppliers, especially those who are identified as having higher potential risk.



Continued assessment of our suppliers who are identified as higher risk

RISK MITIGATION

We manage the risks of modern slavery through our supplier and contractor management system. This is supported through supplier and contractor audits, and is supported by our Modern Slavery/Ethical sourcing policies and procedures, which are embedded in our general HSEQ Management System.

Our contractor/supplier management processes also support how we manage modern slavery, including:

1. Our entire supply chain will be considered, specifically our contractor and supplier/install base.
2. Our existing onboarding and contractor management processes (Contractor Management Manual) minimises the risks of modern slavery through:
 - a. Business compliance assessments
 - b. Licencing reviews
 - c. ABN checks
 - d. Onsite audits
 - e. Terms and Conditions to reflect requirements
 - f. Receipt of sub-contractor statements
3. Supply (and install) activities have been identified as our highest risk
4. A risk matrix of our suppliers/contractors is being implemented to prioritise reviews
5. The consecutive Top GSI businesses will be reviewed annually over a 3 - 4 year cycle
6. Risk factors considered include industry types, GSI, volumes of material, whether they import material

Priority group	Supplier definition	No. of businesses	Risk definition
Category A	Supplies, sources Internationally	16	Supplier, external
Category B	Supplies, sources in Australia only	24	Supplier, internal
Category C	Contractor based	174	Installation only*

* These organisations are contracted on an order by order basis and no labour hire organisations are engaged









REMEDIATION

If Eden Brae becomes aware of slavery or human trafficking within our supply chain, Eden Brae's policy is to address these issues directly with the relevant supplier. Our first response is to immediately cease work with that party and remediate the activity by working with the supplier as they take the appropriate action to cease the identified activity. Remediation will focus on collaboration with our suppliers, however, if there are instances of severe non-cooperative behaviour, these may require Australian Federal Police involvement.

The same applies for instances where contractors/workers are identified as being engaged in an unfair/modern slavery situation. Eden Brae's policy is to investigate (using an external consultant who specialises in Fair Work/Industrial relations, JOPL Pty Ltd), and determine the most appropriate cause of action. This will involve reporting of our concerns to the relevant authority, and, where possible, using our influence to support the workers affected to have their rights re-instated.

EFFECTIVENESS

Effectiveness of our actions will be measured through annual audits conducted by JOPL Pty Ltd, who specialise in HR/ethical sourcing/safety and compliance auditing. This is supported through consultation, assessment of practices and whether practices of contractors/suppliers have changed as a result. The initial milestones of this program are largely complete.

Ongoing efforts continue to evaluate individual suppliers and these have been prioritised by the risk of modern slavery being present in their supply chains as assessed by us using the methodology outlined above.

CONSULTATION

General and direct consultation will be guided by the risk mapping of our suppliers/contractors. Consultation will aim to increase awareness across our supply chain by working directly with suppliers/contractors whose operational contexts are linked to higher PIRs.



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