



WISDOM HOMES

THE WISE CHOICE

**MODERN SLAVERY
STATEMENT**

2024



Reporting Entity

This statement covers the activities of Wisdom Properties Group Pty Ltd
(ABN 82 089 425 829) (**Wisdom**)

Wisdom submits this Modern Slavery Statement in accordance with the Modern
Slavery Act 2018 (Cth) (**Act**).

The statement outlines Wisdom's approach and actions taken to identify and
address the risk of modern slavery and human trafficking within its operations
and supply chain for the calendar year, 1 January 2023 to 31 December 2023.

Wisdom is committed to operating with integrity, strong corporate governance
and to the highest ethical standards. Any behaviour or actions of modern slavery
will not be tolerated.

ABOUT US

Established in 1999, Wisdom Properties Group Pty Ltd (Wisdom) has been constructing homes across New South Wales. Wisdom is a market, award winning professional builder of beautiful and modern homes, pools and landscaping that exceed customer expectations in design and quality. By providing a home, pool and landscaping services, Wisdom offers a full turn-key solution to homebuyers.

With the backing of a global building leader that ensures its financial stability and industry expertise, Wisdom guides the customer through the building process.

Wisdom is a privately owned incorporated, NSW residential building company. The company began as a family owned, new building business based in South West Sydney. Wisdom has grown over the years and is now owned by Japan's Sumitomo Forestry Group.

Wisdom believe the homebuilding journey is just as important as the home. It is one of the biggest life decisions its customers will make, which is why Customer Experience, is at the forefront of everything it does.

Wisdom is made up of a team of dedicated and focused professionals, who strive to exceed our customers' expectations by supporting, nurturing and providing specialised advice giving them the home they have always dreamed of.



ORGANISATION STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Wisdom operates in the residential construction industry in New South Wales, predominantly in the Sydney, Illawarra, Hunter Valley and South Coast.

Wisdom's head office is located in Gregory Hills, New South Wales and it operates display centres across Sydney and the Illawarra at HomeWorld Box Hill, HomeWorld Marsden Park, Cobbitty, Leppington and Calderwood. Its operations are resourced by a team of approximately 127 employees and over 2759 workers within contractors, subcontractors and tradesperson.

Wisdom's subsidiary companies and brands, all of which operate within Australia only, include:

Wisdom Homes;
Wisdom Landscapes Pty Ltd;
Wisdom Pools and Landscapes;
Wisdom Constructions Pty Ltd;
Wisdom Real Estate Sales Pty Ltd
Inspire Group Pty Ltd; and
Canvas Quarter Design Studio.

While only Wisdom meets the criteria of a reporting entity under section 5 of the Act, all steps take to mitigate and assess any risk of modern slavery were taken across all of Wisdoms subsidiaries companies.

Wisdom's principal operations are to design, sell and oversee the construction of project homes, pools and/or landscaping on land owned by customers and on land purchased by the company for the sale of completed homes, or home and land packages. The display homes provide the homebuyer the opportunity to browse the company's range of homes, pool and landscaping services, designs, speak to expert consultants and to experience the quality of finishes and inclusions.



ORGANISATION STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Wisdom's supply chain involves products and services that contribute to the design, marketing, sale and construction of residential dwellings, pools and landscapes, including:

- Office supplies;
- Utilities;
- Promotional and marketing materials;
- Technology (hardware, software, cloud services);
- Home construction goods and materials;
- Specialised trades and labour;
- Labour hire firms in Australia;
- Professional services consultants, organisations and contractors; and
- Operational support services including finance, technology, human resources, sales, marketing, procurement, development and design.

Wisdom's organizational structure and process involves:

1. Sales - made by an internal sales team, with completed 'spec' homes also sold by external agents;
2. Pre-construction – includes drafting, tender/contracts, estimating and pre-construction lodgments, all completed internally, but with scope to use external drafting/estimating resources if demand exceeds our internal capacity;
3. Construction – each home is managed by a site supervisor who engages with the contractors and tradespersons who complete the building works.
4. Maintenance / Warranty – post handover of the home, any warranty or maintenance work is managed by a dedicated internal team, using external tradespersons and contractors.



RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

While Wisdom recognises that modern slavery and human trafficking risk may occur in the organisation and extended supply chain, aside from drafting services performed in China and the Philippines, Wisdom's supply chain involves products and services sourced from local and Australian suppliers. For this reason, Wisdom considers the risk of modern slavery to be very low.

To the extent of our communications and interactions with employees, contractors and suppliers, Wisdom has not been made aware of the existence of any forms of modern slavery in its operations during the reporting period.

Wisdom sources building materials from local and national Australian suppliers, which may source materials/components from overseas suppliers. Wisdom is not aware how they may procure labour during the manufacturing processes, but has made reasonable enquiries with its suppliers to confirm that there are no instances of slavery throughout the network.

To ensure that Wisdom minimises the risk of modern slavery and the potential exposure of human rights more broadly, Wisdom has introduced a range of initiatives to assess contractor and supplier risk, ensuring the organisation has robust and effective processes that are embedded in how it conducts its business.

RISKS IDENTIFIED

Having completed a comprehensive analysis, Wisdom does not consider there is any risk of modern slavery within its internal operations. However, where external resources are used, there is risk of modern slavery practices:

1. Overseas based drafting and estimating resources;
2. The manufacture of material – particularly where the material is manufactured overseas;
3. Mining of materials; and
4. Labor within the supply chain – particularly the use of migrant labor by some contractor companies.

RISK MANAGEMENT

Wisdom has formal policies and procedures in place that are intended to promote ethical and legally compliant business conduct. The policies contribute to their commitment to prevent violations of human rights such as modern forms of slavery in the business, including Code of Conduct, Grievance and Complaint Policy, Whistleblower Policy and Modern Slavery Policy.

Wisdom's Procurement team have a number of risk mitigation and procurement processes in place, including Contractor/Supplier Engagement Agreements and contractor/supplier on-boarding requirements. On each of the Purchase Order, contractors/suppliers are reminded of their obligations to look out for and report any risk of modern slavery.

The external drafting and estimating resources are based in the Philippines and are owned by a related entity of Wisdom. The overseas office are held to the same standards as Australians and provided the equivalent working conditions. This is audited regularly by the Australian based management.

As the construction and maintenance supervisors have the most interaction with the suppliers and tradesmen, a specialized training session is held with them to help them understand the risk and reporting requirements around Modern Slavery and Wisdoms policies on the issue.

All of the above procedural controls will be reviewed to ensure that Wisdom's processes minimise the risk of modern slavery in its operations and supply chains.



RISK MITIGATION ACTIONS



In order to identify and potential instances of modern slavery, Wisdom undertakes the following actions:

Policy

All staff are required to read the Modern Slavery Policy and acknowledge their requirements in ensuring Wisdom comply with its obligations under the Act.

Training

Delivered mandatory modern slavery training to staff to increase capability and awareness. The training includes a requirement that all staff have read and understood the Modern Slavery Policy, then correctly answer 10 questions on the Policy. The training was reviewed and updated this year.

Reporting

A modern slavery email address allows easy, available and open reporting of anything that may constitute modern slavery. It is provided within the Policy and on Purchase Orders issued to contractors and suppliers. No reports were made.

Assessment

Wisdom's procurement team analyzed all supplier and contractor types to assess the potential of modern slavery to exist. Considerations included: whether any products were manufactured overseas, or more specifically, whether the opportunity for modern slavery exists within Wisdom's supply chain. Where a supplier/contractor had multiple risk factors, they were contacted directly to ask what they were doing to avoid modern slavery in their company and supply chain.

A Modern Slavery Committee was formed comprising of a range of Wisdom staff, including the Procurement Manager, WHS Manager, General Counsel and People & Culture Manager. The Committee met regularly (usually every 2nd month) to discuss any potential risks associated with modern slavery and any other actions that may be taken mitigate the risk.

Consultation

Engaged with all suppliers by:

- Issuing a notification to all suppliers and contractors via SkyTrust that (amongst other things) notifies them of :
 - our Modern Slavery Policy and provides them a copy;
 - their obligation to be aware and on the lookout for any potential instances of modern slavery;
 - the email address to report any concerns or potential instances of modern slavery; and
 - the Modern Slavery Policy and a requirement to read and acknowledge the policy in the onboarding of all new suppliers and contractors.

The above steps also assist Wisdom in mitigating the risk of modern slavery occurring within its business and/or its suppliers/contractors.

Planned Actions & Next Steps

- Continue to raise awareness of modern slavery across our supply chain, through regular dialogue and clear guidelines and policies;
- Continue the use of Modern Slavery clauses in all new and renewed supplier and sub-contractor agreements and Purchase Orders, stating they must assess their manufacturing supply chain/s to ensure compliance with all Anti-Slavery Laws and provide training and education to their officers and workers.
- Map supply chain and undertake a detailed risk assessment of higher risk suppliers.
- Include information on Modern Slavery in regular all-team updates.

Effectiveness of Actions

Continue to evaluate the effectiveness of actions taken to prevent Modern Slavery. This includes a comprehensive assessment of our policy reviews and annually when preparing our Modern Slavery Statement. These evaluations contribute to our developing approach to combat modern slavery are effective and aligned with our commitment to ethical practices.



*This statement was approved by the Board
of Wisdom Properties Group Pty Ltd.*

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Yasuhiro Odagane
Director





Wisdom

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