

# Chief Foundation Limited

## Voluntary Modern Slavery Statement

(This is a voluntary modern slavery statement made under Section 6 of the *Modern Slavery Act 2018* (Cth))

Statement Date: 26 July 2024

### Our Unwavering Commitment to Human Rights and Ethical Practices

*Chief Foundation Limited stands firmly against all forms of slavery, inequality, and harm. We are committed to upholding human dignity, ensuring justice, and fostering a safe and inclusive environment for all. We believe in the power of ethical practices and strive to make a positive impact on our communities and supply chains. Our dedication to combating modern slavery is unwavering, and we will continue to take bold steps to eradicate such practices from our operations.*

**Reporting Entity** Chief Foundation Limited  
ABN 76 665 058 793  
(trading as 'Chief Housing')

### Structure & Operations

Chief Foundation Limited operates as a single entity in Australia and is registered:

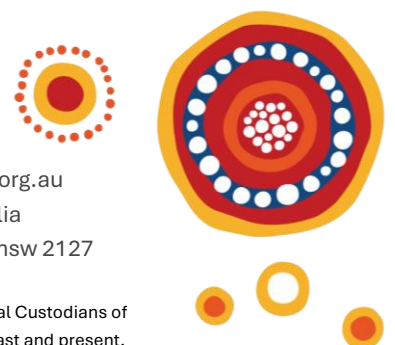
- As a Charity with the public charitable purpose of providing relief for people suffering from poverty with the Australian Charities and Not-for-Profits Commission (ACNC) and is endorsed as a Public Benevolent Institution with the Australian Taxation Office (ATO); and
- As a Community Housing Provider under the National Regulatory System for Community Housing (NRSCH).

We are an affordable housing provider with operations focussed in NSW, where we manage and deliver affordable housing throughout the State.

**Chief Foundation  
Limited**  
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**Acknowledgement of Country.** Chief Foundation would like to acknowledge the Wangal people, Traditional Custodians of the land on which we do business. We pay respect to all First Nations People and our community Elders past and present.



## Supply Chains & Ethical Procurement

We are committed to ethical procurement meaning that we seek to ensure that products and services we source are ethically produced, including in ways that:

- improve the quality of the environmental or reduces harm to the environment;
  - do not involve practices that are socially adverse and are in breach of human rights (including modern slavery<sup>1</sup> and other human rights harms); and
  - comply with legal and corporate governance requirements that are generally accepted or expected,
- (together “**ESG outcomes**”).

Our commitment supports and is aligned with our work with the underprivileged and people suffering the effects of poverty.

Our supply chains encompass a variety of industries, with a focus on the following areas:

### Contractors

We engage contractors for maintenance and cleaning services to ensure our properties are safe and habitable. These contractors are vetted for compliance with our ethical standards and practices, especially regarding ethical sourcing of personnel and treatment of sub-contractors.

### Construction and Maintenance Supplies

We purchase materials and supplies necessary for construction and maintenance activities. This includes sourcing building materials, fixtures, and fittings from suppliers who demonstrate a commitment to ethical practices and can demonstrate to us the ethical sourcing of materials and supplies.

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<sup>1</sup> As defined in the *Modern Slavery Act 2018* (Cth) and *Modern Slavery Act 2018* (NSW). See also the NSW Office of the Anti-slavery Commissioner’s Guidance on Reasonable Steps to manage modern slavery risks in operations and supply chains (<https://dcj.nsw.gov.au/documents/legal-and-justice/anti-slavery-commissioner/ue-diligence-and-reporting/guidance-on-reasonable-steps.pdf>).



## Local and International Suppliers

Our supply chains include both local and international suppliers, all of whom are expected to maintain high ethical standards and comply with relevant labour laws, ethical treatment of sub-contractors and ethical sourcing of materials and supplies.

## Risks of Modern Slavery Practices

We have identified several risks in our operations and supply chains.

### Supply Chain Risks

Risks associated with materials sourced indirectly from regions with weaker labour laws, including construction materials and IT hardware.

### Worker Exploitation

Risks related to the exploitation of casual and migrant workers, particularly in construction and cleaning sectors.

## Actions to Assess and Address Risks

Our requirements in relation to any supplier of goods or services to us are as follows:

- The supplier must be a reputable organisation operating legitimately in their jurisdiction and within governance standards that are generally accepted as good. For example:
  - They must be registered to carry on business (if required under relevant laws).
  - They must be compliant with all legal requirements and generally accepted principles, in particular those relating to:
    - their business and operations, including unethical and illegal behaviours and practices such as bribery and corruption and the environmental impact of their business and operations.
    - their personnel, including recruitment practices, how they remunerate and manage their personnel (for example, adherence to global labour and human rights standards, workplace safety requirements, modern slavery prohibitions).



- They must have taken reasonable steps to achieve the ESG outcomes (described above); for example:
  - They must have visibility (preferably a high level) over their own operations and supply chain (that is, have substantively mapped the supply chain for the goods or services they supply and have identified key suppliers in their supply chain).
  - They must have appropriate policies in place, actions (for example, training of personnel and due diligence activities) and systems to monitor and review compliance with these policies.
- We will do the following as we seek to source products and services which are ethically produced:
  - We will conduct due diligence into each prospective supplier of goods or services, in particular to understand the extent to which there may be modern slavery risks in relation to them as an organisation and in their supply chain and whether they meet our ESG outcomes.<sup>2</sup>
  - We will not procure goods or services from any prospective supplier who, upon due diligence, is found to be unable or unlikely to be able to meet our ESG outcomes.
- We will insert relevant provisions into contracts with suppliers which set out their commitments:
  - in relation to ESG outcomes;<sup>3</sup> and
  - providing timely disclosures to us of material risks.
- We will monitor each supply contract we have entered into to ensure that the supplier we have engaged continue to meet our ESG outcomes and terminate such contract where the supplier fails to meet, or is likely to fail to meet, those requirements.

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<sup>2</sup> For example, using the Commonwealth of Australia’s Supplier Questionnaire in relation to modern slavery ([https://modernslaveryregister.gov.au/resources/Supplier\\_Questionnaire\\_-\\_Modern\\_Slavery\\_Procurement\\_Toolkit.docx](https://modernslaveryregister.gov.au/resources/Supplier_Questionnaire_-_Modern_Slavery_Procurement_Toolkit.docx)).

<sup>3</sup> For example, the Commonwealth of Australia’s model clauses on modern slavery, available from [https://modernslaveryregister.gov.au/resources/Model\\_Modern\\_Slavery\\_Contract\\_Clauses.pdf](https://modernslaveryregister.gov.au/resources/Model_Modern_Slavery_Contract_Clauses.pdf).



Our actions will focus on the following focus areas:

- **Learning and Development** - Continuously educating our staff about modern slavery risks.
- **Ethical Practices** - Implementing high ethical standards and clear actions to mitigate risks.
- **Capacity Building** - Enhancing awareness within our organisation and among our suppliers.
- **Contractors** - Ensuring all our contractors adhere to our ethical standards, especially as regards labour hire and sub-contracting.
- **Construction and Development** - Partnering with reputable contractors who comply with our ethical sourcing and anti-fraud policies.
- **Employee Practices** - Ensuring fair and equitable employment practices consistent with our Code of Conduct and ensuring access to our Whistleblower policy and procedures.

### Effectiveness of Actions

For the current reporting period, we have:

- Developed a supplier checklist addressing modern slavery risks (based upon the Commonwealth's Supplier Questionnaire in relation to modern slavery).
- Updated procurement policies and strengthened supply chain control.
- Integrated ESG outcomes into our practices and business planning, consistent with our charitable purpose of providing relief for people suffering from poverty.

At the end of each reporting period, we will conduct a Board review of our operations, policies and procedures to assess the effectiveness of our actions and where improvements can be made.

### Consultation

We consult with any associated entities to ensure compliance with our modern slavery risk mitigation policies and practices.

### Future Commitments



Looking ahead to the next period, we will continue to review and improve in the following areas:

- **Enhanced Due Diligence** - Review and improve procurement and due diligence processes.
- **Supply Chain Investigation** - Continuously review and update our supplier checklist.
- **Risk Management** - Incorporate lessons learned into our annual risk reviews.
- **Supplier Engagement** - Build stronger collaborations with suppliers.
- **Worker Education** - Raise awareness about modern slavery risks and our mitigation efforts.

### Supporting Overseas Charities

We are currently exploring supporting overseas charities that are providing affordable housing and shelter, to expand our reach to the most vulnerable people. We understand that this support will require a thorough risk analysis and understanding of overseas supply chains and practices.

As part of our commitment, we will ensure that any overseas supported projects have appropriate measures and controls in place to achieve our ESG outcomes, including with respect to combatting all forms of slavery.

### Statement Approval

This Voluntary Modern Slavery Statement was approved by the Board of Chief Foundation Limited on 26 July 2024. Our Board will review this statement annually.



Mark Abraham  
Director

