

Modern Slavery Statement 2025

UNITY HOUSING COMPANY

Reporting Period
1 July 2024 to 30 June 2025

Acknowledgement

We acknowledge and pay our respects to past, present and future Aboriginal and Torres Strait Islander Elders, peoples and nations.

We recognise Aboriginal and Torres Strait Islander peoples as having the world's oldest living, continuous culture with unique languages and spiritual relationships to the land and seas.

Unity Housing Company Ltd (Unity Housing) is strongly committed to practical action aimed at building the physical, cultural, spiritual and family wellbeing of Aboriginal and Torres Strait Islander peoples through our role as a community housing provider.

We renew our determination to listen and to learn from Aboriginal and Torres Strait Islander peoples, to recognise the important contribution they make, and to offer a first-rate service that responds to the diversity of Aboriginal and Torres Strait Islander peoples and their communities.

We acknowledge the traditional Aboriginal and Torres Strait Islander owners of the lands on which we operate and provide homes for people.



"Togetherness" created by Narungga artist Tanaya Antony



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01 Introduction



The Modern Slavery Act 2018 (Cth) (MSA) requires organisations with an annual consolidated revenue of more than $100m to identify and report on the risks of modern slavery in their operations and supply chains, and the steps taken to address, assess and manage these risks.

This Statement is submitted by Unity Housing under section 13 of the MSA to cover our reporting period of 1 July 2024 to 30 June 2025.

Our commitment

In all our actions we are intentional about making a positive impact. We are committed to understanding and fulfilling our responsibilities to our tenants, workers, partners, and the communities we operate in.

The MSA includes within the definition of modern slavery activities such as trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour (situations where children are subjected to slavery or similar practices, or engaged in hazardous work).

We are opposed to all forms of modern slavery. We are committed to the principles outlined in the MSA, to being transparent about our operations and supply chains, and the steps taken to address risks. We recognise our responsibility as an organisation of scale and our ongoing role in educating our staff and working with our suppliers and partners to address modern slavery. We acknowledge the expectations of our tenants and stakeholders to actively address risks.

As part of our commitment to continuous improvement as an organisation, we welcome the opportunity to understand and develop our approach to addressing modern slavery risks with a focus on our governance, our impact and our culture.

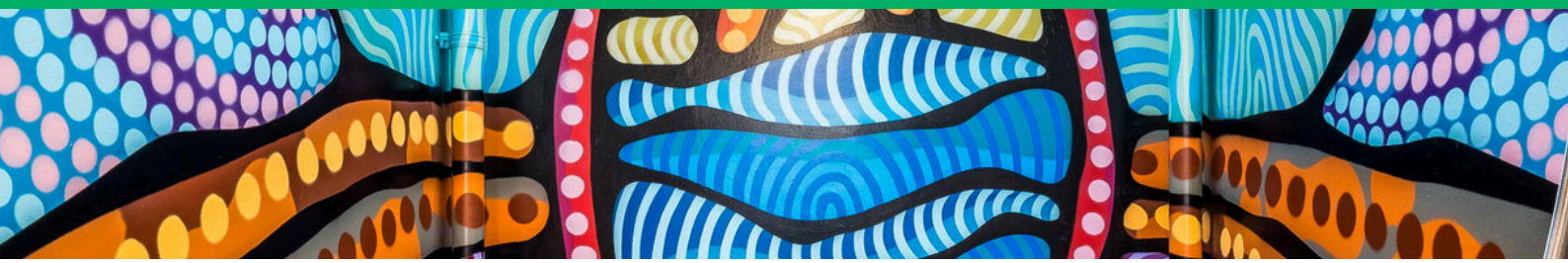
We continue to build a framework that will assist us in adapting and advancing our capabilities to more efficiently identify, assess, and address these risks.

We welcome feedback about this Statement and expect to continually adapt our approach to demonstrate a growing awareness and improvement in our ability to address modern slavery risks.



We are committed to understanding and fulfilling our responsibilities to our tenants, workers, partners, and the communities we operate in.

02
Reporting entity, structure, operations and supply chains



Reporting entity

This statement is submitted by Unity Housing Company Ltd and applies to the following entity:

- ABN: 12 130 704 648
- ACN: 130 704 648
- Registered address: 10 Gibson Street, Bowden SA 5007
- Charitable status: registered with the Australian Charities and Not-forProfits Commission (ACNC)

Unity Housing provides affordable, safe and secure homes for South Australians on low incomes. We build partnerships to create tenancies that promote independence and viable and sustainable communities.

This is Unity Housing's first Modern Slavery Statement. As a first-time reporting entity, the preparation of this Statement has provided an important opportunity to establish the foundations of our modern slavery compliance framework and to better understand the modern slavery risks that may exist within our operations and supply chains. While we recognise that our approach will continue to mature over time, this Statement reflects our commitment to building a structured and sustainable framework for identifying, assessing and addressing modern slavery risks, and for embedding these considerations into our governance, procurement and operational practices.

We view this first Statement as the beginning of a continuous improvement journey. It establishes a baseline from which we will strengthen our systems, processes and capabilities in future reporting periods, while increasing transparency and accountability in our approach to modern slavery risk management.

Legal structure

Unity Housing Company Ltd is a public company limited by guarantee and is registered with the Australian Charities and Not-for-profits Commission as a charitable entity. Unity Housing operates as a not-for-profit community housing provider in South Australia and does not have any owned or controlled entities.

Unity Housing is governed by an independent Board of Directors and supported by an Executive Leadership Team responsible for strategic oversight and operational management. The Board oversees governance, risk management, compliance and organisational performance, including the management of modern slavery risks.

Unity Housing is regulated as a registered community housing provider and is committed to maintaining high standards of governance, compliance and service delivery.



Operations

We are recognised as a community housing provider and work in partnership with governments, developers, builders, financiers, investors, community groups and individuals. Our operations rely on employees, contractors and service providers across a range of operational and professional disciplines.

In the reporting period, Unity Housing:

provided 3,264 units of accommodation

housed 5,701 people

housed 428 new tenants

housed more than 600 occupants who identify as Aboriginal and/or Torres Strait Islander

housed 270 occupants who are from a non-English speaking background

housed more than 1,100 people with disability

conducted 5,231 inspections

had more than $900m assets under management

had $35m annual operating budget

had more than $186m development delivered to date

employed 107 people

The majority of our assets are residential housing properties and related housing assets. We also manage housing assets on behalf of government and other organisations. We consider our operations to pose a relatively low geographic risk in relation to modern slavery. However, we recognise that property management, repairs, maintenance, cleaning and construction-related activities can present elevated modern slavery risks.

Unity Housing provides housing and related services including:

- tenancy and housing management
- property and asset management
- responsive and cyclical maintenance
- housing development and construction
- boarding house and homelessness support services
- community development and tenant engagement programs
- sustainability and energy efficiency initiatives



Tenancy management

Our portfolio includes:

- social housing
- affordable housing
- specialist disability housing
- community housing programs

Asset management

For the purpose of facility operations and maintenance, our asset management activities are delivered in conjunction with third-party contractors and suppliers.

Development

We work with consultants, architects, builders and contractors to deliver housing development and renewal projects.



Unity Housing housed 600 occupants who identify as Aboriginal and/or Torres Strait Islander in the reporting period.

03
Risks of Modern Slavery practices



Unity Housing acknowledges that modern slavery risks may exist beyond our direct suppliers and into extended supply chains. Unity Housing understands that modern slavery risks can arise both within operations and throughout supply chains.

As a community housing provider, our staff interact regularly with tenants who may be experiencing or at risk of exploitation. We recognise that these interactions present both a responsibility and an opportunity; a responsibility to ensure our own service delivery does not contribute to harm, and an opportunity to play a role in identifying and responding to indicators of modern slavery within the communities we serve.

Operational risks

Unity Housing considers the risk of modern slavery within our direct workforce to be relatively low due to:

- compliance with Australian workplace laws
- established recruitment and employment practices
- internal governance and oversight arrangements
- employee policies and procedures

However, we acknowledge that some workers may be more vulnerable to exploitation, including:

- migrant workers
- temporary visa holders
- low-income workers
- workers engaged through labour hire arrangements
- workers with language or cultural barriers



We consider the risk of modern slavery within our direct workforce to be relatively low; however, we acknowledge that some workers may be more vulnerable to exploitation.

Risk assessment approach

Unity Housing has undertaken an initial assessment of modern slavery risks within its operations and supply chains having regard to the nature of services procured, the industry sectors in which suppliers operate, workforce characteristics and, where relevant, geographic considerations.

The majority of Unity Housing's direct suppliers are based in Australia. While Australia has a strong legislative and regulatory framework that generally reduces the likelihood of modern slavery occurring in direct operations, Unity Housing recognises that modern slavery risks can still arise within Australian labour markets and through extended domestic and international supply chains.

Consistent with modern slavery risk assessment frameworks, Unity Housing considers both the likelihood that modern slavery may occur and the potential severity of impact on affected individuals. In assessing risk, Unity Housing has considered recognised indicators of modern slavery, including:

- excessive overtime or unreasonable working hours
- recruitment fees or worker-paid employment costs
- labour hire and subcontracting arrangements;
- restrictions on worker movement or documentation;
- underpayment or withholding of wages;
- vulnerable migrant or temporary visa workforces, and
- limited visibility of lower-tier suppliers.



Unity Housing recognises that modern slavery risks can still arise within Australian labour markets and through extended domestic and international supply chains.

Supply chain and geographic risks

Unity Housing recognises that modern slavery risks may arise through both the industries in which suppliers operate and the geographic locations in which goods are produced or services are delivered. As part of its initial risk assessment, Unity Housing considered both of these factors when assessing inherent modern slavery risks within its supply chain.

The majority of Unity Housing's direct suppliers are based in Australia and provide services within Australia. Australia's regulatory framework, workplace protections and employment laws reduce the likelihood of modern slavery occurring within direct supplier operations when compared with some higher-risk jurisdictions.

However, Unity Housing recognises that modern slavery risks can still occur within Australian industries and labour markets, particularly where workers may be vulnerable to exploitation or where subcontracting and labour hire arrangements are common.

Unity Housing also recognises that some goods procured through Australian suppliers may originate from international supply chains. As a result, geographic risks may exist beyond Tier 1 suppliers where raw materials, manufactured products or components are sourced from countries with weaker labour protections, lower regulatory oversight or known human rights concerns.

In assessing modern slavery risk, Unity Housing considered both:

- the likelihood that modern slavery practices could occur within a particular industry or location, and
- the severity of potential impacts on affected workers should exploitation occur.

Indicators considered as part of this assessment included:

- extensive subcontracting arrangements
- labour hire or temporary workforce arrangements
- recruitment fees charged to workers
- excessive overtime or unreasonable working hours
- underpayment or withholding of wages
- vulnerable migrant or visa-holder workforces
- restrictions on worker freedom of movement or possession of identity documents, and
- limited visibility of lower-tier supply chains.



Supply chain and geographic risks

Based on this assessment, Unity Housing identified the following higher inherent risk areas:

Construction, repairs and maintenance

These sectors commonly involve labour-intensive work, multiple subcontracting tiers and the engagement of temporary or migrant labour. In addition, construction materials may be sourced through complex international supply chains, limiting visibility of labour practices beyond direct suppliers.

Cleaning and security services

These industries have historically been recognised as presenting elevated modern slavery risks due to their reliance on contracted and subcontracted labour, high workforce turnover, low-paid work and the potential engagement of vulnerable workers.

Textiles and IT hardware

While generally purchased from Australian suppliers, these products may be manufactured overseas. Accordingly, risks may arise in extended supply chains where production occurs in jurisdictions or industries known to present increased risks of worker exploitation and poor labour conditions.

Catering, consumables and other outsourced services

Labour-intensive supply chains associated with food production, manufacturing and outsourced services may present heightened risks where there is limited transparency over workforce practices or sourcing arrangements.

Based on its current assessment, Unity Housing considers the most significant modern slavery risks to arise through contractor and supplier relationships operating within higher-risk industries and through extended supply chains where geographic visibility is limited, rather than within its direct workforce. Established recruitment, employment and governance controls reduce the likelihood of modern slavery occurring within Unity Housing's direct operations.



04
Actions taken to assess and address risks



As this is Unity Housing's first Modern Slavery Statement, the reporting period has provided an opportunity to establish the foundations of an ongoing modern slavery compliance framework. Unity Housing recognises that effective management of modern slavery risks is an evolving process requiring the development of governance, policy, procurement and risk management practices that are proportionate to the nature and scale of its operations.

The preparation of this inaugural Statement has enabled Unity Housing to undertake an initial assessment of modern slavery risks that may arise within its operations and supply chains and to identify priority areas for future development and improvement.

As part of this process, Unity Housing has identified opportunities to:

- develop a formal policy framework supporting the identification, assessment and management of modern slavery risks
- incorporate modern slavery considerations into procurement, contract management and supplier engagement practices
- establish a risk-based supplier due diligence approach focused on higher-risk industries and supply chain arrangements
- strengthen governance and oversight mechanisms relating to modern slavery risk
- improve supply chain visibility, and
- develop training and awareness initiatives for employees with procurement, contract management and governance responsibilities.

These activities will support the continued maturation of Unity Housing's approach to identifying, assessing and addressing modern slavery risks and will inform future reporting periods.

Governance and policies

Unity Housing maintains policies and procedures that support ethical conduct, workplace rights and risk management, including:

- procurement, asset management and property development policies
- whistleblower, fraud and corruption policies
- workplace health and safety policies
- equal employment opportunity policies
- Code of Conduct
- Risk Management Framework

These policies support our broader commitment to lawful, ethical and responsible business practices.

Supplier engagement and procurement

Unity Housing seeks to work with suppliers who share our commitment to ethical business conduct and human rights.

Actions undertaken during the reporting period include incorporating modern slavery considerations into procurement processes and reviewing supplier compliance documentation where appropriate. Unity Housing has continued to strengthen procurement and supplier due diligence processes by reviewing procurement practices.

Reporting mechanisms

Unity Housing maintains reporting mechanisms that support the identification and escalation of unethical or unlawful conduct.

Employees and stakeholders may raise concerns through internal reporting channels and whistleblower protections.

05
Assessing effectiveness



As this is Unity Housing's first Modern Slavery Statement, the reporting period has focused on identifying potential modern slavery risks and establishing the foundations of a framework for managing and assessing those risks over time. Unity Housing recognises that meaningful assessment of effectiveness requires the implementation of governance, procurement, supplier due diligence and training initiatives that can be measured and monitored on an ongoing basis.

The preparation of this Statement has enabled Unity Housing to identify opportunities to develop an effectiveness framework that will support future assessment of actions taken to address modern slavery risks within its operations and supply chains.

Future measures to assess effectiveness may include:

- monitoring the implementation of modern slavery policies, procedures and governance controls
- tracking completion rates for modern slavery awareness and training programs
- monitoring the incorporation of modern slavery requirements into procurement processes and supplier contracts
- monitoring the use and effectiveness of grievance, whistleblower and reporting mechanisms
- recording and assessing any indicators or reports of actual or suspected modern slavery risks identified through operations or supplier relationships, and
- developing key performance indicators and reporting measures to support ongoing oversight and continuous improvement.

Unity Housing intends to further develop and refine these measures as its modern slavery compliance framework matures, with future reporting periods focused on assessing the effectiveness of actions implemented and identifying opportunities for ongoing improvement.

06
Consultation



This Statement has been prepared in consultation with relevant internal stakeholders across Unity Housing, including representatives from governance, procurement, operations, asset management and executive leadership functions.

Unity Housing does not control or own any other entities.

07
Approval



This Modern Slavery Statement was approved by the Board of Directors of Unity Housing Company Ltd on 31 July 2026

Signed:

Leigh Garrett
Chair / Director
Unity Housing Company Ltd

UNITY
HOUSING COMPANY



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