

# Modern Slavery Statement

Year Ending June 30, 2023

## About Todd Devine Homes, its Structure, Operations and Supply Chain

Todd Devine Homes (hereafter referred to as TDH) is a privately owned Pty Ltd company, our core business is building dwellings for over 50's residential villages, transportable cabins, country homes and dependant persons units throughout Victoria. We have approximately 53 employees.

Our suppliers can be broken down into two categories.

- Category 1. Local contractors and suppliers within Victoria, supplying minor hardware to perform their tasks.
- Category 2. Major Companies supplying materials such as Dulux, Harvey Norman, Bowens, Elegance tiles, Dahlsens, Boral plaster, James Hardie.

## Risk Assessment and Management of Compliance

TDH have undertaken an internal audit of risks of modern slavery practices existing in our organisation and our supply chain.

All TDH employee contracts comply with the national Australian employment standards and are regularly reviewed for compliance.

Category 1. We see the risk of modern slavery in this category to be compliance around remuneration and working conditions.

Category 2. We see the risk of modern slavery in this category to be materials made overseas depending on its region such as light weight cladding, paint, tiles, carpets and floor coverings.

## How Todd Devine Homes Aims to Comply

- Mapping of existing supply chains to identify ethical sourcing and modern slavery concerns as appropriate.
- Request copies of modern slavery statements from companies that meet the criteria of compliance namely more than \$100 million turnover in any one financial year.
- Perform due diligence on new suppliers to determine their risk level and control procedures in relation to ethical sourcing and modern slavery as appropriate.
- Ensuring employment is freely chosen with remuneration compliant to Fair Work Standards
- Suppliers shall comply with relevant local and national environmental protection laws.
- Work with our major business partners in Lifestyle communities to gain support and consultation throughout this journey.

## Assessing Effectiveness

TDH will assess the effectiveness of the above measures by judging the engagement and compliance of all suppliers, and if any corrective or remedial actions are identified seek consultation with that business to remedy the potential breach.

## 2024 Improvement Program

- Add our modern slavery statement and supplier code of conduct to the TDH occupational health and safety digital platform to allow for regular commitment and compliance to all TDH trades and suppliers.
- Continue to discuss with Lifestyle Communities both companies desire to maximise our efforts in keeping modern slavery away from our businesses and ensuring our combined voice on this subject is heard.
- Learning programs and awareness to senior management within TDH about modern slavery.
- Review TDH modern slavery statement.
- Review TDH supplier code of conduct.

## Statement Approval

This statement has been approved by the principal governing body of TDH, being the director, Todd Cameron Devine on the 9th day of October 2023.



Todd Cameron Devine

## Further information

Any questions or concerns regarding modern slavery at Todd Devine Homes can be directed to 03 9720 1686.