



**CARLISLE**  
*Life's better*



# **CARLISLE HOMES**

MODERN SLAVERY STATEMENT 2025

Carlisle Homes Pty Ltd (ACN 106 263 209) submits this Modern Slavery Statement for the financial year ending 30 June 2025 and in accordance with the *Modern Slavery Act 2018* (Cth).

# ABOUT US

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## **In 2025, Carlisle Homes celebrated 21 years of building quality homes across Melbourne and Geelong.**

In 2025, Carlisle Homes proudly celebrated 21 years of delivering high-quality homes across Melbourne and Geelong, building a strong reputation for craftsmanship, innovation and customer focus.

Over more than two decades, we have consistently received industry recognition across building, design, quality and customer service, reflecting our ongoing commitment to excellence and continuous improvement.

We are honoured to have been recognised as Large Residential Business of the Year by Master Builders Australia (MBA) in 2024, and to have won HIA Victoria's Most Professional Major Builder in 2025. We have also been awarded Australia's Most Professional Major Builder by the Housing Industry Association (HIA) in 2023 and 2021, along with Victoria's Most Professional Major Builder titles in 2015, 2017, 2020, 2022 and 2023 at the HIA-CSR Victorian Housing and Kitchen & Bathroom Awards. In addition, Product Review has recognised Carlisle Homes for exceptional customer service in 2017, 2018, 2023 and 2024.

These achievements reflect our position as one of Australia's highest-rated builders, based on independent customer feedback and reviews.

Our commitment to excellence extends beyond construction and customer service to our broader corporate responsibility. Carlisle Homes is dedicated to identifying, addressing and mitigating risks of modern slavery within our operations and supply chains.

This Modern Slavery Statement outlines the actions taken by Carlisle Homes during FY25 to identify and manage modern slavery risks and sets out our planned initiatives for FY26.

# OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

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Carlisle Homes operates as a privately owned residential building company in Victoria, with a workforce of approximately 500 employees.

The company's Head Office and Spectra Showroom are located in Mulgrave and serve as the primary base for around 400 team members. Our broader operations are supported by staff working across more than 80 display homes and three construction offices throughout Victoria.

Carlisle Homes delivers its services through a range of dedicated business functions, including:

- Construction
- Customer service
- Sales
- Procurement
- Development and Design
- Human Resources
- Marketing
- Finance
- Technology
- Legal

Our supply chains play a key role in supporting the design, promotion, sale and construction of residential homes. While we engage offshore providers for drafting services, all other direct suppliers engaged by Carlisle Homes are located within Australia.

# RISKS OF MODERN SLAVERY IN OUR OPERATIONS

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Carlisle Homes has assessed the likelihood of modern slavery occurring within its own operations and considers this risk to be low. This assessment is based on the fact that our workforce is predominantly located in Victoria, allowing for strong oversight and direct management.

Our employment practices are supported by established internal processes and a dedicated Human Resources function, which monitors compliance with Australian employment legislation and promotes adherence to accepted workplace standards.

We acknowledge that the nature of the construction industry involves layered and complex supply arrangements, where risks associated with modern slavery are more likely to exist. In response, Carlisle Homes has prioritised active engagement with its suppliers, focusing on communication and collaboration to better identify and address potential risks.

# RISKS OF MODERN SLAVERY IN OUR SUPPLY CHAINS

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Through ongoing engagement and direct consultation with suppliers, Carlisle Homes has identified that certain inherent risks of modern slavery may exist within its supply chains. These supply chains primarily involve trades, construction materials, and service providers that support our building activities.

While our direct suppliers are expected to comply with Australian workplace laws, we recognise that risks can increase where labour is further subcontracted, which may limit visibility beyond the first tier of the supply chain. This layered structure can make it more difficult to monitor labour practices in full.

To address these challenges, Carlisle Homes has focused its efforts on working closely with suppliers whose goods may be sourced from jurisdictions considered to present a moderate to high risk, including those associated with weak governance frameworks, child or forced labour, inequality or conflict.

In addition, Carlisle Homes has commenced a review of suppliers engaged to provide offshore drafting services, with the aim of better understanding and managing potential modern slavery risks associated with those arrangements.

# ACTIONS TAKEN AND CURRENT INITIATIVES

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Carlisle Homes' Anti-Modern Slavery Working Group continues to meet on a quarterly basis and provides oversight of our modern slavery governance framework. During FY25, the Working Group progressed a range of initiatives aimed at strengthening our approach to identifying, mitigating and responding to modern slavery risks across our operations and supply chains.

Key actions and initiatives undertaken during FY25 include:

- **Governance and Industry Benchmarking**

Carlisle Homes has undertaken a review of contemporary industry guidance and peer Modern Slavery Statements published on the Commonwealth Register, including those of other builders.

This benchmarking exercise confirmed that Carlisle's governance framework, including a dedicated Anti-Modern Slavery Working Group, regular policy review and defined ownership of modern slavery risks, is aligned with industry practice and comparable to leading peers.

- **Worker-Focused Initiatives – Psychosocial Safety**

During FY25, Carlisle Homes ran several training sessions for its leaders in respect to psychosocial safety. This training program focussed on understanding and controlling risks, strengthening culture and promoting wellbeing.

- **Supplier Contracts and Due Diligence**

With a particular focus on offshore drafting services, Carlisle Homes has continued to strengthen supplier contract terms by incorporating modern slavery compliance obligations, including mandatory reporting of potential risks. Supplier questionnaires form part of our due-diligence processes and support early identification of potential areas of concern.

- **Application of Industry Guidance**

Carlisle Homes has reviewed guidance published by the Property Council of Australia, including Indicators of Vulnerability to Modern Slavery in Property and Construction and Impact Metrics for Addressing Modern Slavery in Property and Construction.

These resources are being used to inform our understanding of worker vulnerability within the construction context and will support the ongoing refinement of our risk assessment and effectiveness measures.

# ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

During FY25, the Anti-Modern Slavery Working Group progressed a number of initiatives aligned with the commitments outlined in our previous statement. We have achieved three of the Key Performance Indicators (KPIs) outlined in that statement, namely:

- ✓ update of key policies and an assessment of policy responses;
- ✓ delivery of targeted training and post-training evaluations; and
- ✓ regular benchmarking of industry standards.

Together, these actions provide a foundation for ongoing monitoring and continuous improvement in our approach to identifying and addressing modern slavery risks.

Our KPIs for FY26 are as follows:

- **Enhanced Supplier Due Diligence**  
Undertake a targeted review of higher-risk suppliers, including those providing offshore drafting services. This will involve the collection of updated supplier questionnaires and supporting compliance documentation. The quality of supplier engagement and responsiveness will be used to assess the effectiveness of our due diligence processes.
- **Contractor and Trades Engagement**  
Develop and distribute a short-form modern slavery awareness resource for contractors and trades. Completion or acknowledgement rates will be monitored to measure the reach and effectiveness of our communication across the supply chain.
- **Internal Capability Building**  
Deliver updated refresher training to key teams, including Procurement, Construction and Customer Service. Training completion rates and post-training confidence assessments will be used as indicators of increased internal capability and awareness.
- **Incident Response Monitoring**  
Monitor and review any concerns raised through the Modern Slavery or Whistleblower policies. The number, nature and timeliness of responses to reports will be used to evaluate the accessibility and effectiveness of our reporting mechanisms.
- **Continuous Policy Review**  
Conduct an annual review of modern slavery governance documents, including policies, supplier contract provisions and training materials, to ensure ongoing alignment with legislative requirements and industry expectations. Any updates made will evidence continuous improvement.
- **Industry Collaboration**  
Participate in at least one relevant industry forum or working group, such as those facilitated by the MBA, HIA or MBV, to benchmark Carlisle Homes' practices against industry standards and maintain current insights into sector-wide risks and best practice.

# CONSULTATION WITH OTHER ENTITIES

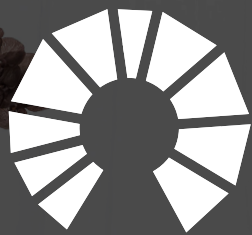
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We do not own or control any other entities and therefore the criteria set out in Section 16(1)(f) of the Modern Slavery Act is not applicable.

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*This statement was approved by John Doulgeridis as the sole director of Carlisle Homes Pty Ltd,*





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HOMES

