

### **CARLISLE HOMES**

**MODERN SLAVERY STATEMENT 2024** 



Carlisle Homes Pty Ltd (ACN 106 263 209) submits this Modern Slavery Statement for the financial year ending 30 June 2024 and in accordance with the *Modern Slavery Act 2018* (Cth).



### **ABOUT US**

### In 2024, Carlisle Homes celebrated 20 years of building quality homes across Melbourne and Geelong.

We have won several industry awards each year in building, design, quality and innovation in customer service.

We are proud to be recognised as the Large Residential Business of the Year by Master Builders Australia (MBA) in 2024, and Australia's Most Professional Major Builder for 2023 and 2021 by the Housing Industry Association (HIA), as well as Victoria's Most Professional Major Builder for 2015, 2017, 2020, 2022 & 2023 at the HIA-CSR Victorian Housing and Kitchen & Bathroom Awards. Additionally, we have been awarded by Product Review for our exceptional customer service in 2017, 2018, 2023 and 2024. These awards recognise us as one of the highest rated builders across Australia based on consumer reviews.

Our commitment to excellence extends to our wider corporate responsibility, and we are committed to taking steps to identify and mitigate the risk of modern slavery.

This Modern Slavery Statement sets out the steps taken by Carlisle Homes to identify and address the risks of modern slavery in FY24 and confirms the initiatives for FY25.

### OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Carlisle Homes is a privately owned, Victorian residential building company with approximately 500 employees.

Our Head Office and Spectra Showroom is located in Mulgrave, which is home to around 400 of our employees.

Additionally, our team works across over 80 display homes and 3 construction offices around Victoria.

Our direct business operations comprise of the following divisions:

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

Our supply chains provide the products and services that contribute to the design, marketing, sale and construction of residential dwellings.

Aside from offshore drafting services, all of our direct suppliers are located in Australia.



## RISKS OF MODERN SLAVERY IN OUR OPERATIONS

As outlined in our previous Modern Slavery Statements, we have determined that the risk of modern slavery within our direct operations is low as our direct workforce is based almost exclusively in Victoria. We have high visibility over those resources and we have a dedicated human resources team to ensure compliance with Australian workplace laws and best practice.

We are aware that the risk of Modern Slavery lies within the complex supply chains that are evident within the construction industry. Accordingly, we have focused our efforts on consultation and collaboration with our suppliers.



## RISKS OF MODERN SLAVERY IN OUR SUPPLY CHAINS

Through direct consultation with our suppliers, we have identified several inherent risks of modern slavery within our complex supply chains. Those supply chains largely consist of tradespeople and the suppliers of construction materials and services. We understand that our direct suppliers ensure compliance with Australian workplace laws, however this risk may increase where labour is subcontracted, resulting in less visibility across the supply chain. We have focused our efforts on consultation and collaboration with those entities that supply goods sourced from countries that are deemed moderate to high risk due to poor governance, child and/or forced labour, inequality and conflict.

Additionally, we have commenced a review of those suppliers that we engage direct to provide offshore drafting services.



### ACTIONS TAKEN AND CURRENT INITIATIVES

Carlisle Homes' Anti-Modern Slavery Working Group continues to meet on a quarterly basis. The Working Group has progressed several initiatives in order to identify, prevent and account for modern slavery risks. A summary of achievements and initiatives in FY24 is as follows:

#### Supplier Contracts

With a key focus on offshore drafting services, Carlisle Homes has continued to amend supplier contracts to include clauses on modern slavery compliance, with mandatory reporting of potential risks. The adherence to these clauses will act as a gauge of supplier engagement and policy success.

#### Zero Harm initiative

In previous statements, we identified that one of our Key Performance Indicators for FY24 would be to establish a Zero Harm program which is dedicated to working towards eliminating physical and psychological harm.

In partnership with Master Builders Victoria (MBV), Carlisle Homes has now launched a bespoke simulation training program focusing on providing our team with greater confidence in emotional regulation, managing challenging encounters, and the essential practice of self-care and compassion.

With over 280 Carlisle Team members now having completed the training, it is now being offered to the public, with a view to providing a positive impact on the wider industry.

#### Team Training

A training session with our Procurement Team has been carried out, to ensure risks are identified and mitigated prior to the engagement of trades and suppliers.

#### Updated Policies

We have updated our Modern Slavery and Whistleblower policies, to specifically confirm that stakeholders may raise concerns relating to actual or suspected risks of modern slavery and associated corrupt or unethical conduct.





### ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

The Anti-Modern Slavery Working Group has achieved three of the Key Performance Indicators (KPIs) outlined in the FY23 Statement, being the updating of policies, continued training and the official launch of the Zero Harm training.

#### Our KPIs for FY25 are:

- Policy Response: Review any matters raised in the amended Modern Slavery and Whistle policies, which will serve as an indicator of the effectiveness of our modern slavery response
- Post-training evaluations: Measure employees' understanding of Modern Slavery risks and their ability to recognise and address concerns. These evaluations will guide improvements in our awareness efforts
- Benchmarking with Industry Standards: Regularly benchmark our modern slavery
  policies and practices against industry best practices. Comparative assessments will
  highlight areas of improvement and validate the effectiveness of our measures.
  Connect with industry bodies such as the Property Council of Australia in order to
  obtain resources and data which will better inform its assessment of modern slavery
  risks and the effectiveness of action taken by Carlisle Homes.
- Policy Awareness Surveys: Conduct regular surveys among employees and suppliers
  to measure awareness and understanding of our modern slavery policies. Improved
  awareness levels over time will reflect the success of our training and
  communication efforts.



# CONSULTATION WITH OTHER ENTITIES

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.

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

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