



CARLISLE HOMES

MODERN SLAVERY STATEMENT 2023

Carlisle Homes Pty Ltd (ACN 106 263 209) submits this Modern Slavery Statement for the financial year ending 30 June 2023 and in accordance with the *Modern Slavery Act 2018* (Cth).

This Modern Slavery Statement is the fourth Statement prepared by Carlisle Homes. Through its Anti-Modern Slavery Working Group, Carlisle Homes remains committed to actively identifying and addressing the risks of modern slavery within its operations and supply chains.

ABOUT US

In 2023, Carlisle Homes celebrated 19 years of building quality homes across Melbourne and Geelong. Having completed over 16,000 homes, Carlisle Homes has evolved to become a market leader in new home building

We are proud to be recognised as 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 and 2023. These awards recognise us as one of the highest rated builders across Australia based on consumer reviews.

We take great pride in the development and continuous improvement of our customer-focused solutions, as well as our wider corporate responsibility. We are committed to improving our procurement and due diligence processes in order to 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 FY23 and confirms the initiatives for FY24.

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 employees.

Additionally, our team works across 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 and display homes. Aside from drafting services in Vietnam and India, all of our direct suppliers are located in Australia.

RISKS OF MODERN SLAVERY IN OUR OPERATIONS

Carlisle Homes' mission is to make lives better – for our people, our trades, suppliers and customers. As our direct workforce is based almost exclusively in Australia, we have determined that the risk of modern slavery within our direct operations is low.

We have a dedicated human resources team to ensure compliance with all workplace laws and best practice. We are proud of the culture that has been established within our business, which has seen us officially listed as a Great Place to Work® and one of the top 10 Best Workplaces™ in Australia.

We offer a comprehensive range of wellbeing initiatives to keep our team healthy, happy, and productive. We are committed to programs that enhance our team members' physical, mental, and financial health, and place a focus on work-life balance. In addition to our state-of-the-art green office and annual wellbeing initiatives, Carlisle is leading the way in educating and raising awareness with programs on Mental Health, Family & Domestic Violence, and Zero Harm.

RISKS OF MODERN SLAVERY IN OUR SUPPLY CHAINS

We are aware that the risk of Modern Slavery lies within the complex supply chains that are evident within the construction industry. Our supply chain is largely made up 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.

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 in FY23 is as follows:

- **Supplier Consultation**

In FY21 we issued a detailed questionnaire to each of our suppliers to determine the visibility each organisation has over its supply chain and whether any risks had been identified and addressed. Since the inception of the questionnaire, we have continued to engage with our suppliers and have successfully increased the questionnaire completion rates.

The information obtained from completed questionnaires and an analysis of our supplier's own Modern Slavery Statements has resulted in further, more detailed consultation with stakeholders.

- **Zero Harm Initiative**

In our FY22 statement, we identified that one of our Key Performance Indicators (KPIs) for FY23 would be to establish a Zero Harm policy which is dedicated to minimising, with the goal of eliminating any mental, emotional and physical harm towards our team – from sales, to office, through to our on-site construction teams.

In 2023, we successfully launched the Zero Harm program.

To ensure its success, a working group of thirteen passionate Carlisle Homes' team members led the design and implementation of the Zero Harm program, including a policy which sets out standards for our visitors, customers, trades, suppliers and team members.

The Zero Harm program also includes training in Mental Health First Aid and multicultural training programs to enhance understanding of cultural sensitivities and expectations.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

The Anti-Modern Slavery Working Group has achieved two of the Key Performance Indicators (KPIs) outlined in the FY22 Statement, being the establishment of a Zero Harm Policy and increased supplier engagement. The Working Group will continue to progress supplier sign-off on the Code of Conduct and Procurement Policy, with a view to achieving sign off from all suppliers in FY24.

In addition to the supplier sign-off on the Code of Conduct and Procurement Policy, our KPIs for FY24 are:

- **Whistleblower Policy**

Update the existing Whistleblower Policy to specifically confirm that stakeholders may raise concerns relating to actual or suspected risks of modern slavery and associated corrupt or unethical conduct. Any matters raised through this policy will serve as an indicator of the effectiveness of our modern slavery response.

- **Staff Training**

Develop and implement new training modules for those employees that engage with our subcontractors and suppliers, such as the Procurement and Construction Teams. We will monitor the completion rates of such training to determine the effectiveness of our actions.

- **Industry Collaboration**

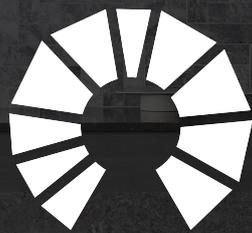
The Anti-Modern Slavery Working Group intends to connect with industry bodies such as the Property Council of Australia in order to obtain resources and data which will better inform its assessment of modern slavery risks and the effectiveness of action taken by Carlisle Homes.

CONSULTATION WITH OTHER ENTITIES

Carlisle Homes does 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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