

24 December 2024

## **National Affordable Housing Consortium Limited Modern Slavery Statement and Human Trafficking Statement**

This Modern Slavery and Human Trafficking Statement is issued pursuant to s14-16 of the *Modern Slavery Act 2018 (Cth)* and sets out our policies and actions taken by National Affordable Housing Consortium “NAH” in our domestic operations and supply chains to address the risks of modern slavery and human trafficking for the financial year ending 30 June 2024.

NAH is committed to improving community awareness of modern slavery practices and aims to contribute to a better world for everyone. NAH aims to review and refine policies and actions that identify and remove any complicity in modern slavery practices.

### **ABOUT US**

NAH is a not-for-profit company limited by guarantee established in 2008 and:

- provides stable housing for social and affordable eligible people and families;
- manages affordable housing rentals for the National Rental Affordability Scheme;
- Facilitates entry into home ownership through the BuyAssist shared Equity program for eligible homeowners;

NAH aims to provide high quality, stable and affordable housing for social and affordable housing eligible people and helps develop pathways towards home ownership for eligible households. Our focus is on providing a safe place for families in need and continually aims to improve our service delivery and community engagement.

NAH has strong relationships with Queensland and Victorian Governments to provide eligible persons access to safe, secure and high-quality housing in metropolitan and major regional centres to assist at-risk and unhoused peoples access to stable medium to long term housing.

NAH has strongly expanded in Queensland and Victoria with numerous approved projects bringing 835 dwellings into the NAH portfolio from 2023 to 2027 as well as currently managing over 1,800 external rentals through select community owners and partners.

## **Risk of modern slavery**

### *Operational risks*

In transitioning from a service provider of the National Affordability Scheme from 2014 to 2023 into a hybrid owner and operator of social and affordable Housing, NAH has been developing community relationships with local, federal and state governments, communities and funding bodies. NAH has developed a strong governance framework and undertakes continuous monitoring of activities through the delegated Audit and Risk and Governance, Compliance Remuneration and Risk committees. NAH has a number of policies that are applicable in assessing the risk of modern slavery and human Trafficking:

- Employee Code of Conduct;
- Whistleblower Policy;
- Risk Management Policy;
- Modern Slavery Policy;
- Compliance Policy.

Such policies provide NAH with a focus on modern policies to adequately reduce risk to an acceptably low level and focus on enforcing strong ethical and lawful behaviour.

At the time of writing and to the best of our knowledge, NAH complies with all workplace, labour and whistleblower policies at both a federal and state level. NAH espouses fairness and compassion to all and endeavours to provide an environment free of bullying, harassment, discrimination and actively promotes equity, diversity and inclusion.

NAH is focused on providing high quality housing for social and affordable renters who are not able to access the rental market. NAH services provided are mainly domestic and sourced from Australian based companies. These domestic businesses are expected to comply with all Australian labour laws and adhere to NAH's terms and conditions with respect to modern slavery practices.

Some of our regional domestic services are contracted to other domestically based organisations, each contractor is assessed individually and held to the same standard as required under Australian labour and trade practices laws.

### *Supply Chain Risks*

Whilst the Domestic operations possess a very low amount of risk, some risk remains to the supply chain for external suppliers who could potentially obtain construction materials from Uyghur provinces in China constructed from resources shipped from Africa. Such risks in the supply chain are mitigated by requiring warrants or evidence of documented compliance with the *Modern Slavery Act*. NAH also has an internal risk and compliance audit process that reviews and assesses the effectiveness of internal controls and policies.

During the year, NAH reviewed the suppliers considered to be exposed to higher levels of risk due to offshore resourcing, warranties have been obtained from them that they do not procure supplies from suppliers that engage in manufacturing these supplies from countries with forced or youth labour. Whilst the number of suppliers considered at risk of exposure to modern slavery occurrences in related supply chains is low and cannot be reduced to zero risk, NAH aims to reduce the risk to an acceptably low level and aims to foster ongoing relationships with only compliant suppliers.

## **Actions taken to assess and address modern slavery risks, including due diligence and remediation processes**

NAH has adopted the following policies to address operational modern slavery risks:

- **Whistleblower policy.** NAH aims to ensure a safe and protected environment for all related entities, employees and their families so that whistleblowers are supported and protected to express concerns, guarantees anonymity and provides that whistleblowers will be free of victimisation or retaliatory action.
- **Employee Code of Conduct.** NAH aims for its staff to be aware of NAH's commitment to providing a safe and inclusive workspace for all people and have codified the expected behaviours and act socially responsibly during their employ.

## **RISK ASSESSMENT**

NAH's management and focus as a first-time adopter of the Modern Slavery Policy in 2023-24 and associated statement was to understand and educate key staff on identifying key modern slavery risks in both operations and the downstream supply chain. The Audit and Risk Committee will review an assessment performed by the Governance, Risk and Compliance manager annually and will require input from Business Development, compliance, Tenancy Management and Finance departments to form a Modern Slavery Committee. The function of the Committee is to:

- Notify the executive leadership team (ELT) of any Modern Slavery matters;
- Contribute to refining the Environment, Social and Governance policies and procedures;
- Advise on changes to existing policies and procedures that require refinement;
- Prevent and reduce risk of modern slavery occurring in operations and identify potential risks to our downstream supply chains;


## **ASSESSING THE EFFECTIVENESS OF OUR ACTIONS**

NAH will document outcomes in relation to the meetings and will perform internal audits on our major suppliers to review their own submitted Modern Slavery Statements or warranties as provided.

NAH will continually monitor and refine the modern slavery policy including compliance trends and levels of voluntary submissions of our suppliers.

## **BOARD APPROVAL**

This statement has been endorsed by the Board of National Affordable Housing Consortium Limited at its meeting held 3 December 2024.



**Brad Hosking**

**Chief Executive Officer**

**NAH Group**