



METRICON

Modern Slavery Statement - Financial Year 2024



*This statement covers the activities of
Met Group Holdings Pty Ltd ABN 55 668 768 974,
ACN 668 768 974.*

m
metricon

Contents

Introduction	4
Our business	5
Our structure, operations and supply chain	6
Potential risks in our operations and supply chains	8
Assessing and addressing risks, due diligence, remediation, and assessing effectiveness of actions	10
Consultation process with owned entities	13
Impact of COVID-19	13
Future commitments and continuous improvement	14

MODERN SLAVERY STATEMENT

Introduction

Introduction

Modern slavery is a significant global concern and in the broadest sense, incorporates any circumstance of exploitation, including, but not limited to, slavery, servitude, forced labour, child labour, human trafficking, abuse of power, threats, withholding of wages and deprivation of freedom.

This statement is made pursuant to the requirements of the Australian Modern Slavery Act 2018, for financial year ending 30 June 2024.

Metricon prides itself on steady corporate governance and supports the objectives of the Act. Metricon believes that issues of modern slavery must be addressed, and doing so aligns with our mission, vision, purpose and values.



MODERN SLAVERY STATEMENT

Our Business

"To be Australia's leading homebuilder...trusted to always deliver"

Our Business

We have a proud history of building quality homes for Australians since 1976. Our unwavering dedication to excellence has helped us become Australia's market leader.

Our vision is "to be Australia's leading homebuilder...trusted to always deliver" which drives everything we do; from a friendly greeting at our display centres, our volunteering and social responsibility programs that give back to our communities, providing a workplace free from discrimination and harassment, right through to our supportive and transparent supplier relationships.

Metricon was awarded Australia's number one residential builder in 2024 for the ninth consecutive year by the Housing Industry Association (HIA), with a total of 3,894 new home starts across Victoria, New South Wales, Queensland and South Australia.



MODERN SLAVERY STATEMENT

Our structure, operations and supply chain.

Our structure, operations and supply chain

This statement covers the activities of Met Group Holdings Pty Ltd, which owns:

- **Metricon Homes Pty Ltd, ATF for Metricon Homes Unit Trust, which then owns:**
 - ~ **Building College Australia Pty Ltd;**
 - ~ **Newfield Real Estate Pty Ltd**
 - ~ **Australian Building Company Pty Ltd**
- **Metricon Homes Qld Pty Ltd ATF Metricon Homes Queensland Unit Trust, which then owns:**
 - ~ **Australian Building Company Queensland Pty Ltd.**

Met Group Holdings' major shareholder is Sumitomo Forestry Australia Pty Ltd, which is wholly owned by a Japanese listed company, Sumitomo Forestry Co., Ltd (Sumitomo Forestry).

Sumitomo Forestry is an advocate of Human Rights and a signatory of the 10 principles of the United Nations Global Compact. As a controlled subsidiary of Sumitomo Forestry, Metricon shares the same beliefs regarding the importance and protection of Human Rights.

As at 30 June 2024, Metricon had approximately 1,700 employees, 3,800 trade contractors and 3,000 suppliers (both direct and indirect) across Australia.

For the purposes of this statement, our key operating entities and operations and the associated supply chains are as follows: *(next page)*



MODERN SLAVERY STATEMENT

Our structure, operations and supply chain.

Entity	Main Operations	Supply Chain
Metricon Homes Pty Ltd	<ul style="list-style-type: none"> • Designs, markets and constructs low-rise residential dwellings on customers' land, or as part of a house and land package, in VIC, NSW and SA. • Owns display homes, and land for future display homes in VIC, NSW and SA. • Purchases lots in VIC, NSW and SA for on-sale to house-and-land package customers. • Assists customers with the provision of finance via brokers. 	<ul style="list-style-type: none"> • Office consumables and uniforms. • Promotional and marketing materials. • Technology (hardware, software, cloud services). • Utilities • Professional services consultants/organisations/contractors, including recruitment firms, law firms, agents, engineers, building surveyors, designers, and IT and HR professionals. • Labour hire firms in Australia, Vietnam, Philippines and Singapore (including drafting, estimating and IT professionals) • Sub-contractors who work on home construction, including arborists plumbers, electricians, gasfitters, drainers, tilers, carpenters, cleaners, excavators, painters, concreters, traffic management, bricklayers, plasterers, caulkers, levellers, sanders, renderers). • Home construction goods and materials (including soil reports, land surveys, energy assessments, CCTV, power pits, bins, tanks, pumps, paint, concrete, rock, steel, timber, joists, roof trusses, beams, lintels, bricks, hebel, cranes, waterproofing, windows, door frames, doors, bricks, brick sand, eaves material, fascia gutter, flashings, tiles, roofing, floor material, cladding, lock up material, mouldings, screens, insulation, sisilation, plaster, fixing material, basins, sinks, cabinetry, benchtops, cooking and kitchen appliances, dishwashers, heating, cooling, vacuum systems, plumbing units, hot water units, rangehoods, stairs, lights, stone, wallpaper, mirrors, shelves, electronic systems, baths, showers, sanitaryware, electrical fittings, antennas, fit off materials, carpets, balustrades, caulking, clotheslines, decks, letterboxes, fencing, flyscreens, window furnishings, scaffold, guard rails, generators, retaining walls).
Metricon Homes Qld Pty Ltd	Same as above, but in QLD and northern NSW.	
Australian Building Company Pty Ltd	Same as above, but in VIC, NSW and SA, under the ABC brand.	
Australian Building Company QLD Pty Ltd	Same as above, but in QLD, under the ABC brand.	
Newfield Real Estate Pty Ltd	Licensed Real Estate Agent, for the purpose of selling house-and-land packages to customers	
Building College Australia Pty Ltd	Registered training organisation. Designs and delivers onsite and classroom-based building training in the residential building industry.	

MODERN SLAVERY STATEMENT

Potential risks in our operations and supply chains.

Potential risks in our operations and supply chains

In 2024, Our Modern Slavery Working Group undertook a review of potential modern slavery risks across our operations, supply chains and vendor categories.

We considered risks that may possibly cause, contribute and/or be directly linked to modern slavery practices, in accordance with the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities.

Resultantly, Metricon has deemed the following as having no or low risk:

- Direct employee activities and internal processes
- Our engagement with professional labour hire firms in Australia, Vietnam, Philippines, and Singapore due to being larger, skilled, professional services firms
- Our site-based sub-contractors, e.g., where our sub-contractors undertake sub-contracting to other parties who are working on Metricon sites, and any potential underpayment of those third parties does not constitute modern slavery.

Some of Metricon's materials suppliers have been identified as potential risks, e.g., where Metricon's local suppliers source products and components from overseas sources, who in turn have modern slavery issues. The next section below details the measures taken to address these risks.



MODERN SLAVERY STATEMENT

Assessing and addressing risks, due diligence, remediation, and assessing effectiveness of actions.

Assessing and addressing risks, due diligence, remediation, and assessing effectiveness of actions

Our objective is to ensure our employees, suppliers, agents, sub-contractors and other associates place significance on human rights and sourcing labour, materials and products in a sustainable, ethical and responsible manner. Any behaviour or actions under the broad sense of modern slavery will not be tolerated.

To facilitate this, we have:

1. Risk & Compliance Committee

Led by our Chief Information & Risk Officer, this committee is responsible for managing enterprise risk and compliance and prepares Metricon's annual Modern Slavery statement, and reports through to the Board of Directors.

Assessing effectiveness: metrics are tracked of enterprise risks opened versus closed, risks not actioned, in progress or mitigated, as well as the action being taken to address each risk.

2. Modern Slavery Working Group

Cross functional working group led by Chief Information & Risk Officer, involving Legal, Finance, Procurement, OHS, People & Culture. This group meets as required to identify and assess any potential modern slavery risks, and resolve, escalate and monitor any such risks.

Assessing effectiveness – audits are performed ensuring all measures required to be implemented by the working group have been completed, as well as the success of those measures.

MODERN SLAVERY STATEMENT

Assessing and addressing risks, due diligence, remediation, and assessing effectiveness of actions.

3. Code of Conduct

Promotes ethical and legal business conduct..

Assessing effectiveness – metrics are tracked of completion rates of mandatory staff sign off on the Code.

4. Metricon Integrity (Whistleblower) Policy and Program

Supported by a third-party disclosure services provider, allowing disclosures to be made anonymously, with a fair, objective and confidential investigation process by qualified personnel. Also published via Metricon's external website.

Assessing effectiveness – metrics are tracked of volume of disclosures made and closed, as well as completion rates for mandatory staff training on the program.

5. Procurement and Building Committee

Led by our General Manager of Building and Operations, this national committee administers our National Procurement Policy and vendor selection, and governs direct and indirect supplier agreements, all of which mandate compliance with laws, regulations, safety, ethics and environment. The committee also conducts regular category reviews and manage vendor/sub-contractor key performance indicators (KPIs), including adherence to laws and ethics.

Assessing effectiveness: metrics are tracked of successful execution of each required action item of the Committee.

MODERN SLAVERY STATEMENT

Assessing and addressing risks, due diligence, remediation, and assessing effectiveness of actions.

6. Subcontractor and Independent Contractor Working Group

Led by Chief Information & Risk Officer, involving Legal, Finance and People & Culture, this group ensures all contractors have completed a prequalifying as well as annual questionnaire, and have agreements requiring compliance with laws and ethics.

Assessing effectiveness: 100% of contractors are reviewed annually, ensuring all have completed a questionnaire and have an agreement in place.

7. Vendor selection

Modern slavery has been specifically built into national vendor selection criteria, for direct and indirect spend categories, and a modern slavery questionnaire is required to be completed by all new vendors prior to onboarding.

Assessing effectiveness: audits are conducted of whether modern slavery has been considered for all new vendors onboarded.

8. Vendor agreements

Modern slavery clauses have been built into our direct, indirect, sub-contractor and independent contractor agreements.

Assessing effectiveness: agreement templates are audited to ensure clauses exist across all templates.

9. Vendor questionnaires

An annual modern slavery questionnaire is sent out to all suppliers and higher risk sub-contractors, requiring vendors to describe their modern slavery risks, and how they assess and mitigate any such risks, amongst other questions.

Assessing effectiveness: responses are tracked with a target of a 100% vendors response rate. An internal assessment is made as to the quality and content of responses provided, as well as any risks that have been identified within vendor responses.

MODERN SLAVERY STATEMENT

Consultation process with owned entities & Impact of COVID-19.

Consultation process with owned entities

All of Metricon's related entities are 100% held within the group under common directorship, therefore, the implementation of all modern slavery processes and governance, as well as the preparation of this statement, has been done in conjunction with all owned entities.

Furthermore, Metricon is governed by a Board which includes employees of Sumitomo Forestry and therefore consultation is also achieved in that way.

Impact of COVID-19

In April 2020, the Australian Border Force issued an information notice asking businesses to consider the impacts of COVID-19 on modern slavery risk mitigation and to provide comment in the Modern Slavery Statement.

Generally, our operations and supply chains remained resilient and strong during the reporting period. We implemented comprehensive COVID-19 safe procedures and guidelines on worksites and in our offices, Studios and Display Homes, comprising of social distancing, personal screening, hygiene measures and shutdowns where required.

MODERN SLAVERY STATEMENT

Future commitments and continuous improvement.

Future commitments and continuous improvement

Over the next year, we will continue reviewing whether any improvements are required to the measures described in 'addressing risks' section above, as well as continuously looking for new ways to mitigate modern slavery risks.

Metricon's Modern Slavery statement was approved by its Board on behalf of the Metricon Group on 18th December 2024.



Brad Duggan
Chief Executive Officer - Metricon Group

