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MODERN SLAVERY STATEMENT

FINANCIAL YEAR 2020



REPORTING

This statement was approved by the board of Eden Brae Holdings Pty Ltd (“Eden Brae”) pursuant to Section 16 of the Modern Slavery Act 2018.



Todd Symons
Company Director

12 May 2021

Date



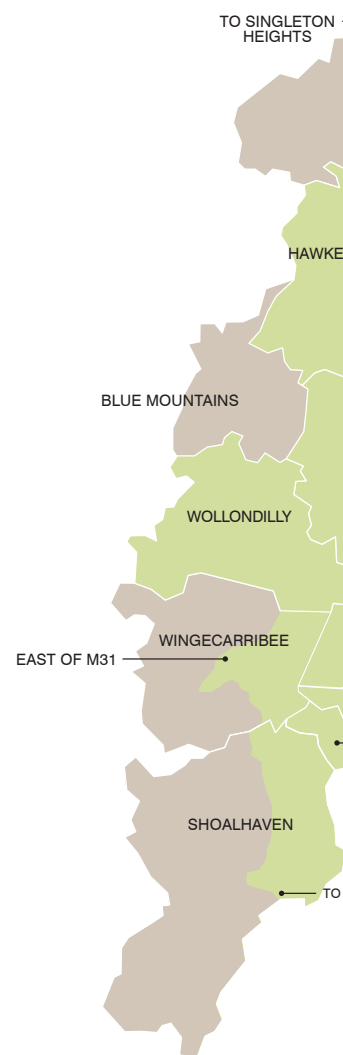
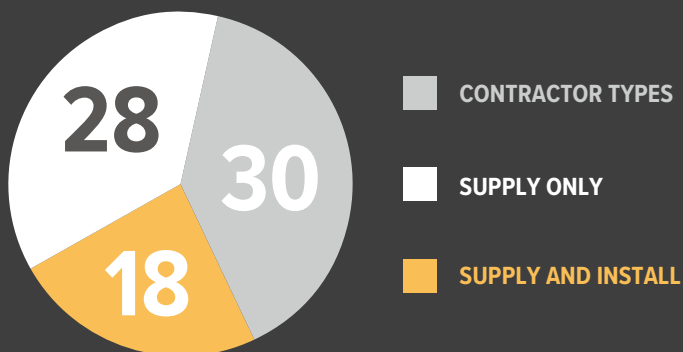
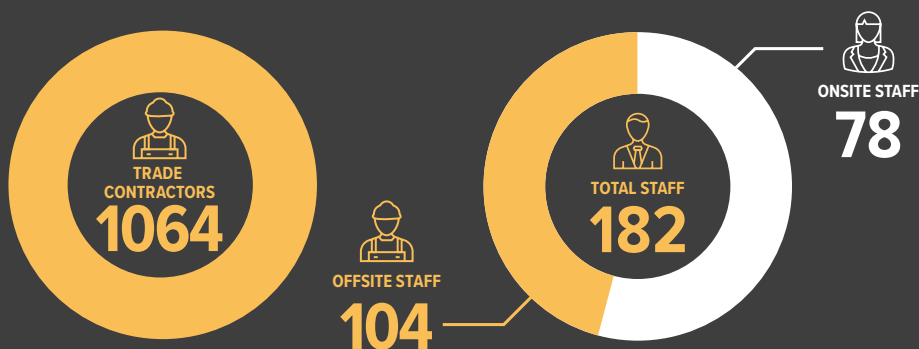
BUSINESS FRAMEWORK

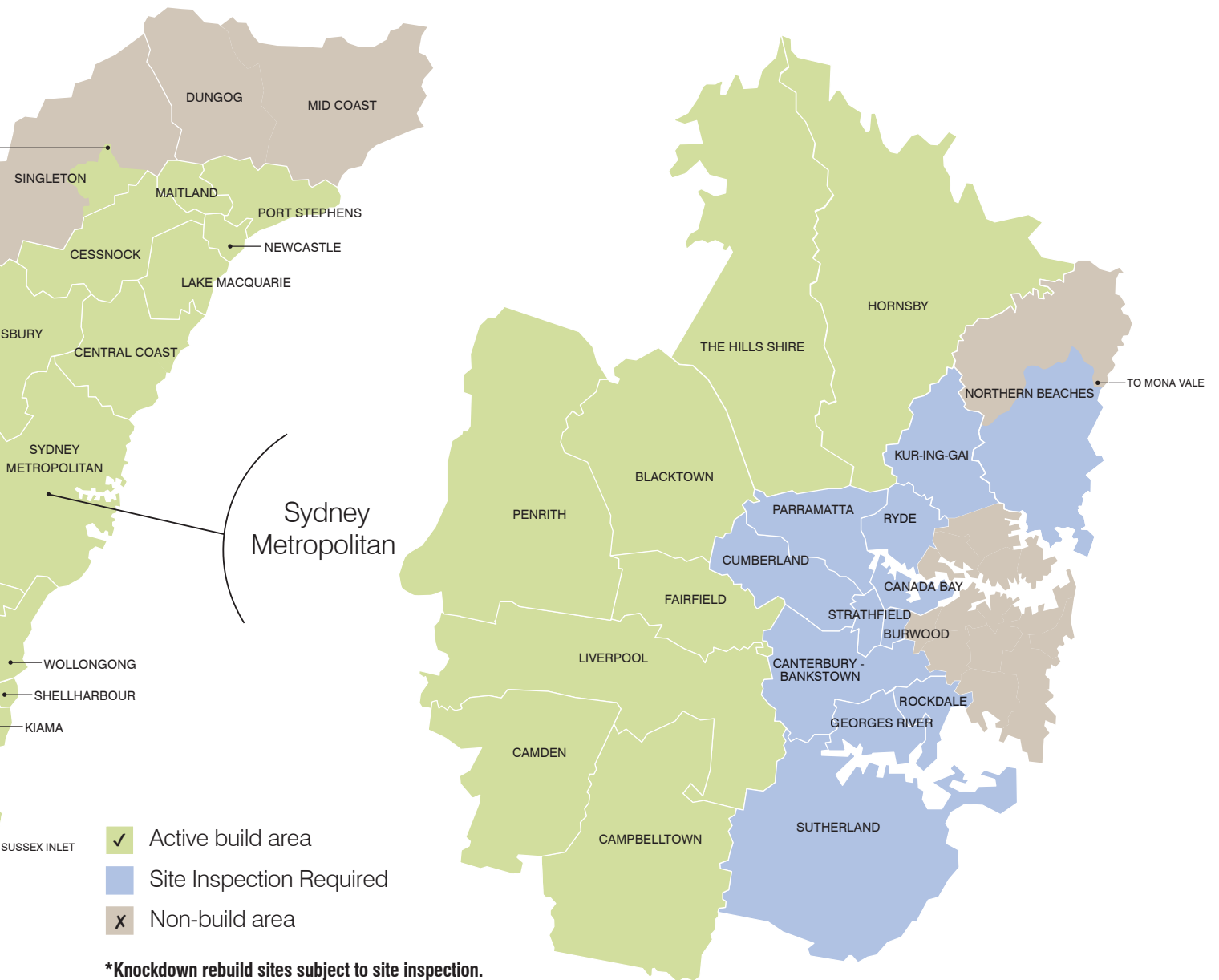
Eden Brae is a privately owned Australian residential builder operating in NSW. We undertake construction in an area including Sydney metro and expanding to the Central Coast, Newcastle and Hunter regions in the north, and to the Illawarra in the south.

Our business engagement profile is primarily a labour force comprising local contracting businesses e.g. concreters, carpenters, bricklayers, electricians.

All suppliers and contractors engaged are sourced within Australia, where Australia has a low prevalence index rank (PIR). Where possible, materials are sourced within Australia.

PERSONNEL OVERVIEW







RISK OF MODERN SLAVERY

Global Slavery Index (GSI) ratings are available [here](#) which provide an indication of the risk levels across countries/regions.

As our business engagement profile is primarily local contracting businesses (with a labour focus) and based in Australia, our prevalence rating is low. Our existing contractor selection and ongoing performance processes mitigate the risk of modern slavery occurring in these business inputs.

Products supplied by third parties could be sourced externally to Australia, which increases the risk of modern slavery occurring in these supply chains and these are the ongoing focus/consultation with suppliers.

FY20 HIGHLIGHTS



Formalised our modern slavery procedure and assessment tools.



Conducted a risk assessment to map and assess modern slavery risk across our supply chain.



Internal education commenced.



Assessment of our identified higher risk suppliers commenced.

RISK MITIGATION

Eden Brae applies a risk management approach when assessing the risk of modern slavery within our operations. As the enactment of the Modern Slavery Act 2018 is a relatively new concept within Australia, our initial steps have been to increase corporate knowledge, map out the milestones of key activities and the mapping/risk assessment of suppliers and their sourcing of (raw) materials including labour.

Concurrently, our contractor management processes support how we manage modern slavery, including:

1. Our entire supply chain will be considered, specifically our contractor and supplier/install base.
2. Our existing onboarding and contractor management processes (Contractor Management Manual) minimises the risks of modern slavery through stepping including:
 - a. Business compliance assessments
 - b. Licencing review
 - c. ABN checks
 - d. Onsite audits
 - e. Terms and Conditions to reflect requirements
 - f. Receipt of sub-contractor statements
3. Supply (and install) activities have been identified as our highest risk
4. A risk matrix of our suppliers/contractors is being implemented to prioritise reviews
5. The consecutive Top GSI businesses will be reviewed annually over a defined cycle
6. Risk factors considered include industry types, GSI, volumes of material, whether they import material

Priority group	Supplier definition	No. of businesses	Risk definition
Category A	Supplies, sources Internationally	16	Supplier, external
Category B	Supplies, sources in Australia only	24	Supplier, internal
Category C	Contractor based	103	Installation only*

* These organisations are contracted on an order by order basis and no labour hire organisations are engaged









REMEDIATION

If Eden Brae becomes aware of slavery or human trafficking within our supply chain, Eden Brae's policy is to address these issues directly with the relevant supplier. Our first position is to cease work with that party and remediate the activity by working with the supplier as they take the appropriate action to cease the activity. Remediation will be focused on working with our suppliers, however, there may be instances of severity or non-cooperative behaviour that may require Australian Federal Police involvement.

EFFECTIVENESS

Effectiveness of actions will be carried out through consultation, assessment of practices and whether practices of contractors/suppliers have changed as a result. The initial milestones of this program are complete.

The subsequent steps will involve more detailed evaluation of individual suppliers selected by reference to the assessed risk of modern slavery being present in their supply chains.

CONSULTATION

General and direct consultation will be guided by the risk mapping of our suppliers/contractors. Consultation will aim to increase awareness across our supply chain by working directly with suppliers/contractors whose working contexts are in higher PIRs.



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