



# Modern Slavery Statement

FY2025



Housing Choices Australia  
Limited

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Approved by: Housing Choices Australia Limited Board of Directors

This Modern Slavery Statement is prepared by Housing Choices Australia Limited (HCAL) in accordance with s16 of the Modern Slavery Act 2018 (Cth). It sets out the actions taken by HCAL and its affiliated entities (HCA Group) to consider and address the risks of modern slavery and human trafficking in our business and supply chains.

This Modern Slavery Statement was approved by the Board of HCAL in their capacity as principal governing body of HCAL on 25 November 2025.

A handwritten signature in blue ink, appearing to read 'Simeon Goldenberg', is positioned above the printed name.

Simeon Goldenberg

Chair of the Board of Directors of Housing Choices Australia Limited

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# Introduction

## Our Commitment

At HCAL, we believe that everyone deserves access to safe, secure, and affordable housing. As an award-winning developer and housing provider, we recognise the responsibility that comes with our role. Not only to deliver quality homes but also to ensure that our operations and supply chains uphold the highest ethical standards.

Modern slavery is a serious and complex global issue, and while we have not identified any confirmed instances within our operations or supply chains, we acknowledge the risks that may exist, particularly across multi-tiered global supply chains where visibility can be limited.

We acknowledge the diversity of our customers and that past practices in Australia of slavery and forced labour have impacted Aboriginal and Torres Strait Islander peoples and Pacific Islander peoples.

Over the past year, we have focused on establishing the foundations of our modern slavery framework. This has included strengthening procurement practices, developing policies, and embedding awareness across HCA Group.

Our commitment to continuous improvement means that we will continue to build capability, work collaboratively with suppliers and stakeholders, and integrate responsible business practices.

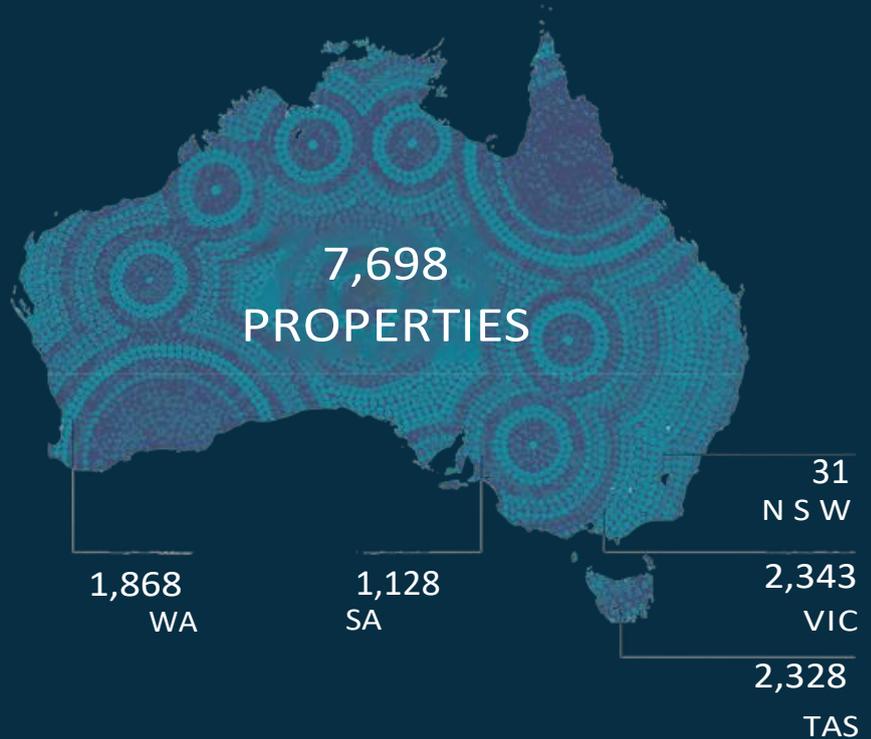
This statement reflects the steps we have taken and our plans to enhance our approach over time.

We remain committed to transparency, accountability, and contributing to the identification, mitigation, and eradication of modern slavery in all its forms.

# Organisation Overview

HCA Group is an independent, national, not-for-profit housing provider. HCAL is the reporting entity of the consolidated group and is a registered charity.

We deliver high-quality property and tenancy management and manage social housing contracts on behalf of state governments. As a registered Specialist Disability Accommodation (SDA) provider under the National Disability Insurance Scheme (NDIS), we also create safe, accessible homes designed to support people with disability to live independently and with dignity.



We are one of the largest community housing providers in Australia, with operations in Victoria, South Australia, Tasmania, New South Wales and Western Australia.

It is our purpose to provide affordable, accessible homes with connection to community and services that enable people to build their lives.

We currently manage 7,754 social and affordable properties that are home to more than 13,000 residents.

# Our Structure

The organisation operates through a multi-layered entity structure, with HCAL serving as the parent entity overseeing several key subsidiaries and other associated companies, including Housing Choices Tasmania Ltd, Housing Choices South Australia Ltd, Housing Choices Western Australia Ltd, Housing Choices New South Wales Ltd, and Disability Housing Ltd.

This structure allows for strong governance and oversight, positioning HCA Group to address the housing needs of Australians on a national scale.

The HCA Group has a robust governance framework, with Board oversight augmented by delegated governance and risk subcommittees.

HCA Group has a governance framework, with practices underpinned by key policies:

- Code of Conduct
- Procurement
- Privacy
- Risk Management and Framework
- Whistleblower
- Fraud, Corruption, Misconduct Prevention
- Feedback & Complaints

# Operations

## Customer Services

HCA Group employs 300+ staff across locations in Victoria, South Australia, Tasmania, New South Wales and Western Australia.

HCA Group owns and manages long-term properties, ranging from apartments and units to single dwelling homes. We offer long-term rental housing to residents on low to moderate incomes and provide ongoing professional tenancy and asset management services and maintain major social housing contracts on behalf of various state governments. Additionally, we provide supportive services for people in specialised programs such as crisis accommodation and are a registered Specialist Disability Accommodation (SDA) provider with the National Disability Insurance Agency, managing over 570 SDA tenancies.

All customer facing services are provided by staff employed by HCA Group, with all staff employed under appropriate employment instruments.



# Operations

## Property Development

HCA Group is an award-winning social and affordable housing developer working collaboratively with government, community partners, and private sector stakeholders to increase the supply of housing. Through our integrated approach to project management, design, and delivery, we are committed to embedding responsible and ethical practices across our development activities.

As well as well-designed homes, our developments include important community consultation and placemaking programs that enhance neighbourhood interaction and foster connection to place and between people.

We recognise that the construction industry can involve demand for less-skilled labour as well as complex supply chains with a high degree of subcontracting. We are also aware that materials used in construction may be sourced from geographic locations that are high-risk.

HCA's property development program is subject to Management, Board and Regulatory oversight.



# Supply Chains

HCA Group engages a diverse range of suppliers to procure goods, works and services that support our operations across Australia. Our key procurement categories include:

- Property and facilities management including cleaning, maintenance, gardening and security services
- Information Communications Technology (ICT) including hardware, software and support services
- Vehicle fleet management including leasing, maintenance and fuel services
- Construction and building services including new developments, fit outs and upgrades
- Professional services including legal, financial, consultancy, and recruitment services
- Corporate travel including transport and hotel accommodation

While many of our suppliers are based in Australia, we acknowledge that some goods and services in these key categories may be sourced through multi-tiered supply chains that extend overseas.

HCA Group recognises that certain categories may present a higher inherent risk of modern slavery, particularly where:

- Labour intensive services are provided, such as cleaning, security and construction
- Finished products, or components such as ICT hardware, are sourced internationally from countries with less developed labour protections
- Temporary or subcontracted labour is used in the delivery of services

To strengthen our procurement governance and improve visibility over our supply chains, HCA Group has recently established a procurement function and framework. This will enable us to embed stronger due diligence processes within our sourcing activities.

In FY25, a detailed review of our procurement spend profiles improved our visibility of key categories and suppliers. In FY26 we plan to identify Tier 1 suppliers and develop a program to map key supply chains to assess potential areas of risk.

# Risks



HCA Group recognises that modern slavery can take many forms, including forced labour, debt bondage, and human trafficking. While we have not identified any confirmed cases, we acknowledge potential risks across our multi-tiered supply chains, particularly offshore where visibility is limited.

We have a Whistleblower policy that outlines the circumstances under which disclosures are protected and encourages reporting of matters including corrupt conduct, criminal or illegal conduct, and unethical or other serious improper conduct. HCA Group has dedicated Whistleblower Protection Officers, an independent external reporting service, to receive reports, and we encourage people to report actual or suspected misconduct.

# Risks

## Operations Risk

We consider the risk of modern slavery within our direct operations to be low. Our employees are engaged under Australian workplace laws and covered by industrial instruments that provide strong protections.

However, we acknowledge heightened risks where HCA Group outsources services or engages contractors and third-party providers. These include:

- Security, cleaning, and maintenance services
- Labour hire practices used by some subcontractors

These risks are managed through controls in our procurement processes, including supplier due diligence checks, supplier code of conduct and contractual clauses.

We also recognise that vulnerabilities can arise within our own workforce. HCA Group employs a small number of staff on sponsored visas in senior leadership roles where specialist expertise is not available locally. Our People and Culture team understands and manages its sponsorship obligations to ensure compliance.

Some of our staff speak English as a second language. To reduce risks of exploitation linked to communication barriers, our recruitment process asks candidates if they require special accommodation, a translating and interpreting service can be made available where needed. Whilst it is not practical to translate all documents, we ensure staff have adequate support to understand their rights and obligations.

Our People and Culture team is strengthening our onboarding process to ensure employee awareness of workplace rights. In addition, our Workplace Grievance and Complaints and Procedure provide a formal mechanism for raising concerns.

Together, these measures assist to reduce the risk of vulnerable workers being exploited within HCA Group's direct operations.

# Risks

## Geographical Risk

We acknowledge that the risks of modern slavery may be heightened in some of our supply chains especially offshore where visibility is limited. To manage these risks, we undertake proportionate due diligence, including reviewing supplier practices, assessing geographic risk profiles, and engaging directly with key suppliers where possible.

## Supply Chain Risk

Most of HCA Group's direct suppliers are Australian based, however many goods and services are sourced through complex global supply chains. Modern slavery risks may arise in:

- Products and services: uniforms, electronics and cleaning supplies
- Sectors: construction, facilities management
- Geographies: regions with weaker labour protections or limited enforcement

As part of our FY26 – FY28 procurement strategy, we will develop and implement a supplier segmentation model to:

- Map our Tier 1 suppliers
- Clarify supplier locations
- Understand spend by category and geography

These insights will support future targeted risk assessments across higher-risk categories.

# Actions and Effectiveness

During this reporting period, HCA Group focused on building the foundations of our modern slavery risk management framework and establishing a national procurement policy and related procedures.

## Achievements this year

- Establishing a procurement function supported by a procurement strategy, policy and procedures
- Introducing governance and internal controls across sourcing activities, supplier engagement and contract management
- Integrating modern slavery considerations into procurement by requiring suppliers to provide position statements during tender and quotation processes
- Publishing our Supplier Code of Conduct, embedding compliance expectations into all new contracts
- Creating a mandatory staff awareness module on modern slavery risks and reporting pathways



# Actions and Effectiveness

## Our Focus Areas

We will continue our phased approach, initiating work on several key actions as detailed in our three-year procurement roadmap:

- Mapping and confirming Tier 1 suppliers to improve supply chain visibility
- Conducting supplier risk assessments and prioritising higher risk categories
- Reviewing supplier contracts and developing standardised templates with modern slavery clauses
- Rolling out a supplier due diligence questionnaire targeting high-risk suppliers
- Piloting a supplier engagement program to discuss expectations and assess readiness.
- Launching HCA Group's modern slavery awareness program to build staff capability

We will take a staged approach to these initiatives to ensure actions are practical, sustainable and embedded effectively.

## Effectiveness of Our Actions

This reporting period focused on designing and implementing the policies, procedures and governance structure required to manage modern slavery risks. We have also worked to gain a deeper understanding of where and how modern slavery risks may be present in our operations and supply chains.

While it is too early to undertake a detailed assessment of effectiveness of our actions to date, we are establishing a baseline for future measurement and are continually improving our methods to identify risks in our operations and supply chains.

# Actions and Effectiveness

## Emerging Metrics for FY2026

- Completion rates for HCA's modern slavery awareness module
- Staff feedback on knowledge and confidence in identifying potential risks
- Percentage of suppliers completing risk assessments or providing position statements
- Number and proportion of new tenders and supplier contracts that include new modern slavery clauses

As part of our FY26 – FY28 procurement roadmap we will refine our measures and assess progress across four key performance areas:

- Governance and due diligence
- Procurement and supply chain
- People and Culture practices, training and awareness
- Grievances and reporting and remediation

## Future Focus

HCA recognises that addressing modern slavery risks requires continuous improvement, collaboration, and transparency. We are committed to strengthening our framework and embedding risk management and responsible sourcing into our operations and supply chains through a staged and measured approach.

Our approach will be guided by:

- Our three-year procurement roadmap
- Collaboration with industry networks and external partners to share learnings and improve practices
- Capability building, educating staff, contractors, and suppliers to better identify and manage risks

## Consultation

This modern slavery statement was prepared collaboratively by Procurement and Risk & Compliance and then reviewed with our Executive Leadership Team. Input from operational leaders across the HCA Group was sought through consultation and circulation of drafts.

This process ensured that the perspectives of each owned and controlled entity were incorporated and the actions and commitments described in this Modern Slavery Statement apply consistently across the HCA Group.