



BUILD WITH CONFIDENCE

# MODERN SLAVERY STATEMENT

PERIOD ENDED 31 DECEMBER 2025





## REPORTING

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This statement was approved by the board of Eden Brae Holdings Pty Ltd (“Eden Brae”), the ‘Reporting Entity’ pursuant to Section 16(1a) of the Modern Slavery Act 2018.

  
\_\_\_\_\_  
Todd Symons  
Company Director

\_\_\_\_\_  
May 2026

Date

# EDEN BRAE'S STRUCTURE, OPERATIONS AND SUPPLY (16(1)(b))

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.

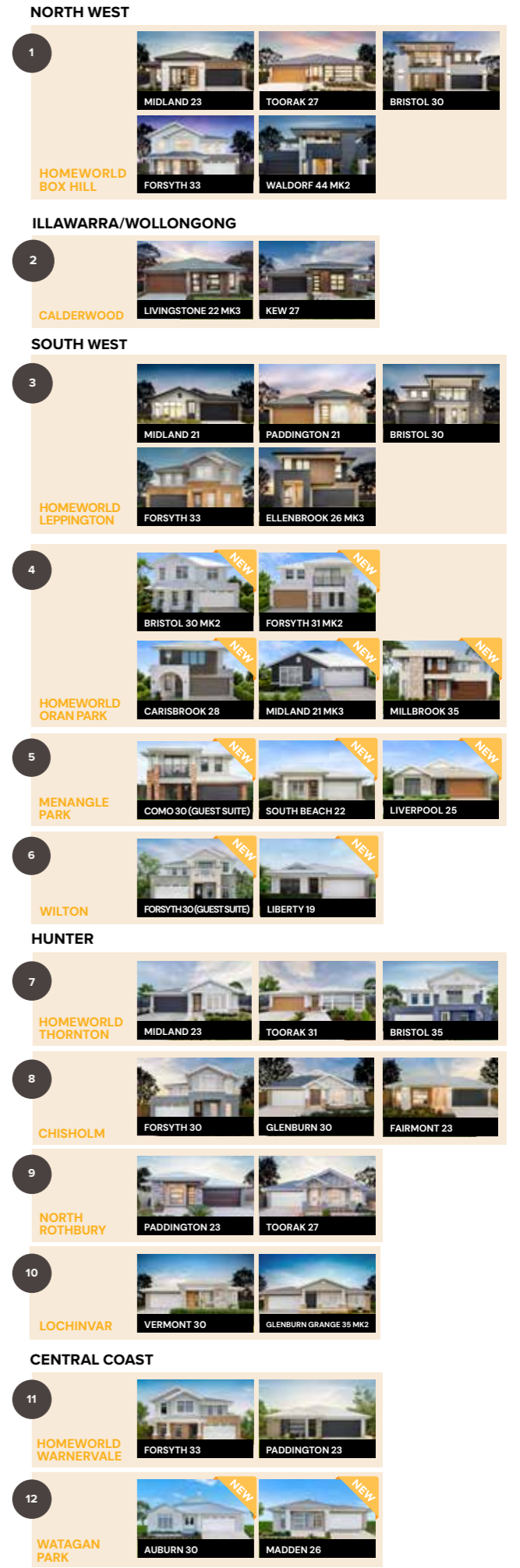
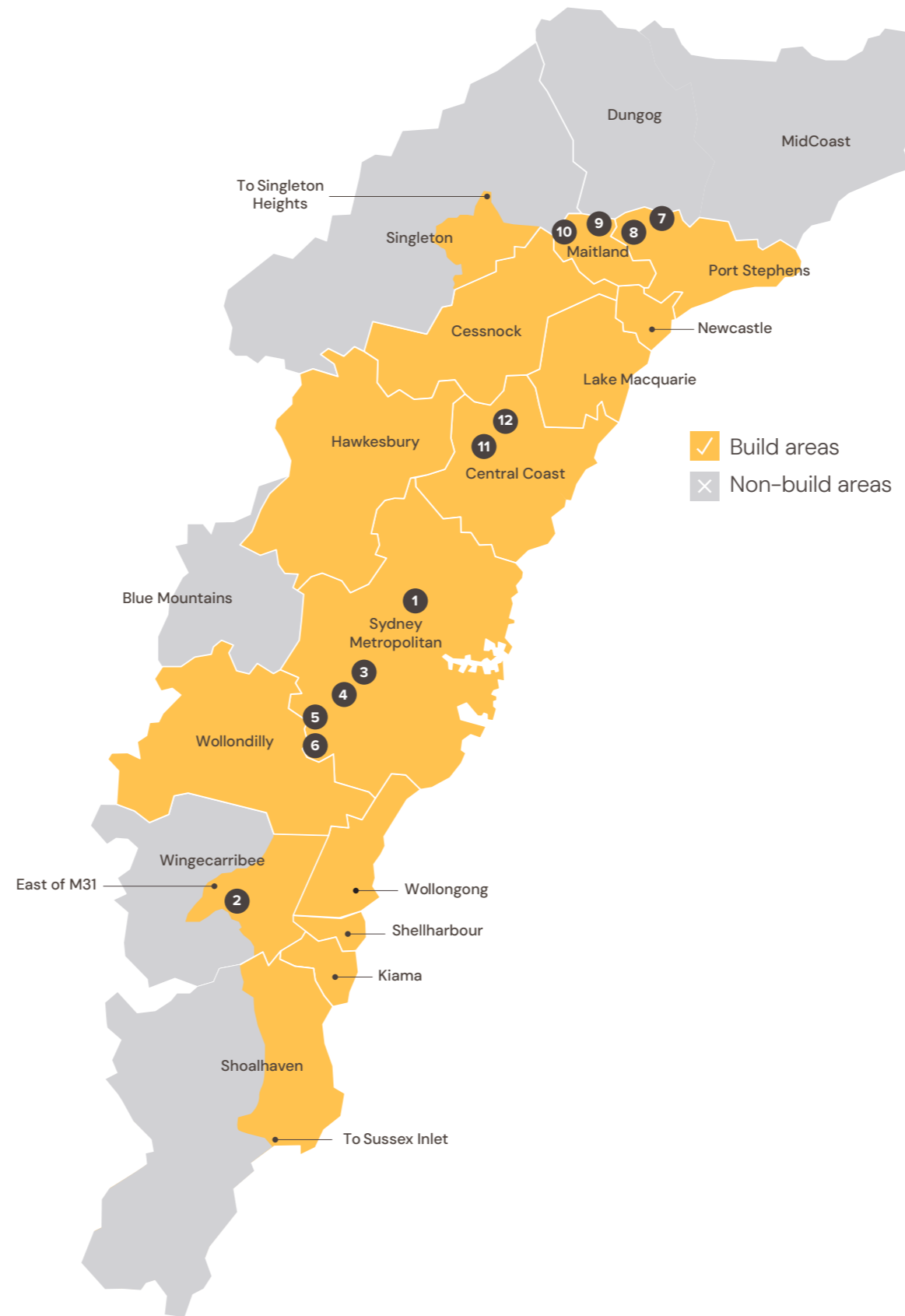
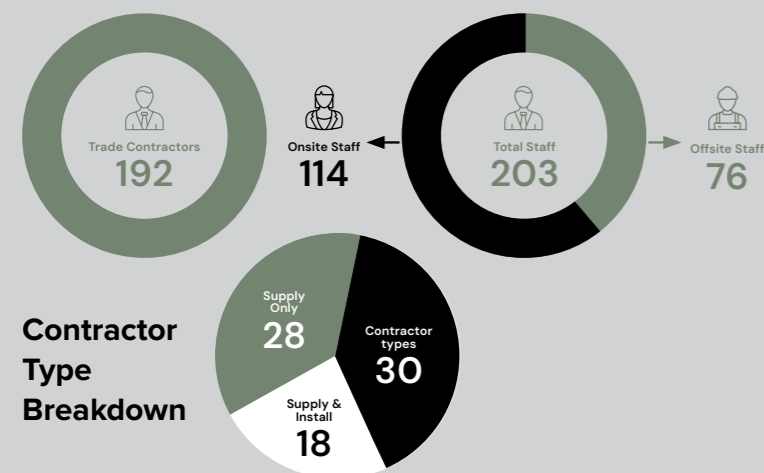
In terms of operations, Eden Brae has two administrative bases: the head office in Sydney, and satellite office in the Hunter Region of NSW. Eden Brae is comprised of a number of specific teams, including marketing, sales, construction management, and support services. Eden Brae is supported by a strong network of sub-contractors, who perform direct works on site. Subcontractors are only able to further subcontract works with Eden Brae's approval. Construction is overseen by a team of Eden Brae site supervisors.

In terms of Eden Brae's supply chain, material procurement is managed by an internal team of experienced and dedicated construction estimators. Our online management system allows a robust approach to supply integrity and contractor/supplier approval. Eden Brae organises material through suppliers, which means Eden Brae maintains control over the procurement program.

Eden Brae has no ownership in, or direct involvement with, any other party in its supply chain.

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 (16(1)(c))

Eden Brae's core modern slavery risks include the potential of sourcing materials which have been manufactured or sourced from groups, countries, or regions where unethical labour standards or other unconscionable practices occur, and modern slavery in terms of work conditions for local workers/ subcontractors.

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

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

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

### FY2025 HIGHLIGHTS



**Further developed internal risk assessment to map and assess modern slavery risk across our supply chain.**



**Continued Internal education for internal staff and external contractors and suppliers, especially those who are identified as having higher potential risk.**



**Continued assessment of our suppliers who are identified as higher risk**

# RISK MITIGATION (16(1)(d))

We manage the risks of modern slavery through our supplier and contractor management system. This is supported through supplier and contractor audits and is supported by our Modern Slavery/Ethical sourcing policies and procedures, which are embedded in our general HSEQ Management System.

Our contractor/supplier management processes also 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:
  - a. Business compliance assessments
  - b. Licencing reviews
  - 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 3 - 4 year cycle
6. Risk factors considered include industry types, GSI, volumes of material, whether they import material.
7. Our internal audit program, based on ISO 45001, 9001 and 14001, has been expanded in 2025-2026 to address the SMETA 4 Pillar program of WHS, HR, Ethics, and Environmental commitment.

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	174	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 response is to immediately cease work with that party and remediate the activity by working with the supplier as they take the appropriate action to cease the identified activity. Remediation will focus on collaboration with our suppliers, however, if there are instances of severe non-cooperative behaviour, these may require Australian Federal Police involvement

The same applies for instances where contractors/workers are identified as being engaged in an unfair/modern slavery situation. Eden Brae's policy is to investigate (using an external consultant who specialises in Fair Work/Industrial relations, JOPL Pty Ltd) and determine the most appropriate cause of action. This will involve reporting of our concerns to the relevant authority, and, where possible, using our influence to support the workers affected to have their rights re-instated.

## EFFECTIVENESS (16(1)(e))

Effectiveness of our actions will be measured through annual audits conducted by JOPL Pty Ltd, who specialise in HR/ethical sourcing/safety and compliance auditing. This is supported through consultation, assessment of practices and whether practices of contractors/suppliers have changed as a result. The initial milestones of this program are largely complete.

The effectiveness of the Eden Brae modern slavery prevention program is measured through the formalised internal audit program, which addresses the SMETA four pillars, as outlined above.

Ongoing efforts continue to evaluate individual suppliers, and these have been prioritised by the risk of modern slavery being present in their supply chains as assessed by us using the methodology outlined above.



## CONSULTATION (16(1)(f))

As Eden Brae has no ownership in, or direct involvement with, other engaged entities, this consultation is focused on direct workers, contractors, and suppliers. These groups are defined as those entities/groups who require consultation regarding Eden Brae's modern slavery program.

**Direct workers:** We aim to provide full training/consultation coverage of our direct employees every twelve months, with training/consultation led by our external consultants, JOPL. The focus of these sessions is on educating workers about modern slavery and seeking their input on our practical approach to modern slavery prevention. For example, seeking their view on ways we could better assess/evaluate our compliance.

**Subcontractors:** Avenues of consultation for our subcontractors include our newsletter and direct supervisor interactions. We encourage the reporting of issues or concerns and maintain a constant feedback loop of information and communication. We audit our suppliers based on their risk level and our internal ISO and SMETA-influence auditing program, as outlined in our Internal Audit Program.

**Suppliers:** We consult directly with suppliers, asking them questions about their modern slavery prevention programs, and maintain a constant feedback loop focused on adapting Eden Brae's approach to meet our suppliers' needs and expectations. A supplier evaluation form which focuses on the supplier providing feedback to Eden Brae on its modern slavery prevention policies and framework is being trialled during 2026. This supplier consultation is led by our procurement/estimation team, and includes planned overseas factory and local factory/manufacturing visits where practical.



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