



# ABN Group Modern Slavery Statement





# Introduction

Reporting entity ABN Group Pty Ltd ('ABN Group' or 'the Group') is Australia's leading construction, property and finance company headquartered in Perth, Western Australia with substantial operations in Perth, Western Australia and Melbourne, Victoria.

The content of this statement was guided by the Modern Slavery Act 2018 (Cth) ('the Act') and Guidance for Reporting Entities (May 2023). It outlines the actions taken by ABN Group during FY24, along with the framework used to assess the effectiveness of measures for identifying the risk of modern slavery in its operations and supply chains.

The Group consulted the relevant entities within its ownership or control in the development of this statement.



## An Australian success story

**For over 45 years ABN Group has delivered the dream of home ownership to tens of thousands of homeowners across Australia.**

ABN Group operates over 17 businesses across Western Australia and Victoria, covering new home design and construction, commercial construction,

property development, property financial planning and mortgage broking, plumbing, concreting, roofing, ceiling and wall fixing, and kitchen design and installation.

Behind our success lies our purpose: delivering the dream of home ownership. It's the reason we exist and it guides everything we do. We've earned a reputation for passion, authenticity and excellence. We've become innovators in home design and a leader in our markets. We've won countless awards but, more importantly, we've won the trust and hearts of thousands of people.

# ABN Group Snapshot

Peace of mind with a financially secure  
and market leading group of companies.



### Market leaders

We're the second largest residential  
builder in WA and second largest in  
Australia, completing over  
4,000 homes a year



### Delivering the dream

We've built over 94,000 homes  
since 1978, including first homes,  
apartments, units & luxury homes



### Invested in the future

We've trained over 1,600  
new tradespeople through  
ABN Training since 2004



### Making finance simple

40,000+ people helped to  
access finance solutions  
through Resolve Finance



### Trusted by our people

1 in 4 customers currently  
building with ABN Group  
were referred by someone  
who trusts us



### Employer of choice

We work with over  
1,900 employees and 3,000+  
subcontractors across WA  
and Victoria



### Creating lasting value

Our current commercial,  
residential and property  
development projects are  
over \$2 billion in value



### Community-minded

We've donated more than  
\$10 million to worthy charities  
through the Alcock Family  
Foundation since 2006

# Residential Construction



### Boutique Homes

Following its acquisition in 2008, Boutique Homes has earned its  
reputation for exceptional quality, premium value and innovative design.  
Our attention to detail and care for our customers has helped us become a  
leader in the Victorian housing market.



### Celebration Homes

Since 2002, Celebration Homes has continued to build its reputation  
on quality, spaciousness, and affordable prices. We place quality and  
customer service at the forefront of everything we do.



### Dale Alcock Homes

As one of Western Australia's most trusted and well-known home builders,  
Dale Alcock Homes makes everyone feel at home. Established in 1987,  
we've become a leader in residential construction, delivering on our  
promise of excellence time and time again.



### Dale Alcock Homes South West

Since 1995, we've become the South West's leading residential home  
builder, delivering the dream from Harvey to Margaret River. Our  
reputation is built on outstanding local knowledge, quality workmanship  
and superior service.



### Homebuyers Centre

Specialising in the Victorian and Western Australian first home markets,  
Homebuyers Centre is well known for its reliability and innovation. We  
believe that an affordable home should always be a quality home.



### Webb & Brown-Neaves

Since 1978, WB has designed and built luxury homes across Perth,  
collecting countless awards along the way. We pride ourselves on how we  
meet client needs with intuitive designs and bring unique visions to life.



# Financial Services

Resolve Finance is one of Australia's undisputed leaders in the field, offering a range of financial services to support the home ownership journey.

Since launching in 1997, Resolve has financed more than 40,000 homes, helping hundreds of homebuyers into new homes each month. When you choose Resolve Finance, rest assured you're in safe hands every step of the way.

Supporting our building companies and customers in Western Australia, Victoria, Queensland and New South Wales, the team at Resolve Finance are here to provide a complete financial service that includes mortgage broking, home loans, and personal finance.

**Resolve services include:**

**Mortgage broking** Our brokers have access to home loans from a panel of more than 30 lenders.

**Home loans** Through our company Bluebay Home Loans, we offer unique and niche home loan options to suit our customers' specific needs.

**Personal finance** We offer personal loans which cover many different purposes to support the needs of our customers.



# Land Development

With a focus on creating close-knit, sought after places to live, the Parcel Property team is driven by a genuine desire to find customers a home they love.

Parcel is a leader in the Perth property development industry with a solid and diverse understanding of the market and of its customers' needs.

They strive to empower their customers by sharing expert knowledge and tools to help home purchasers make the right land choice with confidence.

Parcel continues to expand and diversify with a growing portfolio of residential land estates that extends across the Perth metropolitan area. From Yanchep in the north through to Baldivis and Port Kennedy in the south, Parcel has an impressive portfolio of developments.





# Commercial Construction



## PACT Construction pursues excellence with its relationship-first approach.

As a Tier 2 commercial builder, PACT Construction leverages the responsiveness and agility of a small firm with the large-scale efficiencies, strength, and financial security of a major builder. Since launching in 2004, PACT has delivered projects across multiple sectors including commercial, education, retail, aged care, multi-residential, industrial, and health.

We're always looking for ways to build potential in our projects, people, processes, and business to ensure we continue to deliver exceptional service for our clients. In every project, we challenge the status quo to achieve industry best practice outcomes.



## Dale Alcock Projects skillfully caters for Perth's growing 'missing middle'.

Our team of medium-density builders provide clients across Perth with award-winning knowledge and expertise when bringing their projects to life.

From group housing projects, mixed-use developments, medium-density infill projects, retirement villages and childcare centres, we ensure projects are delivered on time, in budget and to the highest quality.

Our unique hybrid model combines the efficiencies and acumen of a commercial firm with the trade base, processes and IP of WA's leading residential volume builder.

We pride ourselves on offering a flexible model that can be tailored to our clients' unique requirements.



# Home Collective

Access inspiration, home, land, finance and design experts and our WA building companies all under the one roof.

Offering an incredible showroom space, where you can explore every kitchen drawer, turn on fully functional taps and showers, and test a range of products and brands unmatched in WA, Home Collective makes designing a dream home easy.

**Perth** 301 Vincent Street, Leederville

**Bunbury** Homemaker Centre, Strickland Street

In Victoria, Boutique Home customers are invited to the Abode Inspiration Studio—an immersive showroom where expert Interior Designers help bring the vision for your new home to life.

**North Geelong** Glass House, Mackey Street

# Integrated Support Services

Our tailored construction resource services in Western Australia guarantee the highest standards in all areas of operation.



## Boeing Plumbing

Performs a broad range of expert commercial and residential plumbing services expert for our companies in WA.



## Ceiling Solutions

Provides some of the best wall and ceiling fixers in the state to deliver fixing and home insulation services to our residential building companies in WA.



## Concretus

Services the diverse concreting needs of our WA operations, from the initial concrete slabs to high-end decorative concrete product.



## Hi-Point Roofing WA

Manages our metal roofing functions, providing the best possible service and outcomes at the most competitive price for our customers.



## The Maker Designer Kitchens

Designers and manufacturers of award-winning kitchens and bathrooms; supplying cabinetry, stone, aluminium and glazing products to the WA market.



# Home Assist

Smoothly extending the home building journey.

The building journey does not finish once the keys are handed over. Home Assist plays the next part in our customer's journey, supporting them while their new home settles through the seasons.

Home Assist offers a dedicated team of experts to manage the after-care service and maintenance for every residential building customer in Western Australia, delivering the ultimate peace of mind that their dream home is in the best hands.

Along with after-care and maintenance support, Home Assist provides a wide range of resources to help our customers in taking care of their new home.





# Modern Slavery Risk Assessment

The Group operates wholly in Australia, using Australian-based building and construction suppliers, contractors and employees that are protected by Australia’s industrial relations systems.

We procure products and raw materials from Australian-based suppliers and do not directly import from overseas suppliers.

ABN Group does engage professional labour hire firms in Australia who are subject to Australian requirements to report and track modern slavery obligations. These firms engage professional staff in Vietnam, Philippines and India to complete operational and office-based administrative tasks.

In higher-risk jurisdictions, we engage only larger skilled professional service firms to perform these services. These firms are fully aware of their modern slavery obligations and are responsible for identifying and highlighting potential risk areas to the Group. Additionally, they are subject to comprehensive risk assessments.

The Group acknowledges that the large supplier base we engage with have their own complex and diverse supply chain for products and raw materials that extend beyond Australian borders. This extended supply chain can carry the potential risk of modern slavery.

The Global Slavery Index has identified the top five imported products at risk of modern slavery in Australia and ABN Group has potential ‘Moderate’

exposure to four of the top five, including electronics, garments, solar panels and textiles.

The Group responds to this potential risk by:

- Using Australian-based suppliers and internationally recognised brands.
- Completing regular risk assessments of Tier 1 suppliers, including reviews of their modern slavery frameworks (if applicable).
- Collaborating with suppliers identified as ‘high risk’ to understand their risks and the strategies they have in place to mitigate them.

While the risk in the Australian workforce is low, the Group is aware that constant pressure to maintain competitive pricing can be a driver for modern slavery. The ongoing impacts of pressures on the residential housing market in Australia continues to result in cost increases for goods and services, and labour shortages.

These ongoing industry pressures are recognised as a risk factor for an increased demand for goods and services directly or indirectly from countries where modern slavery risk may be more prevalent. Through our framework we work closely with suppliers to assess and manage this risk.

## Organisational Structure, Operations and Supply Chain

### Structure and Operations

ABN Group is a privately owned Western Australian incorporated company and Ultimate Holding Company of 57 subsidiary companies. All but three subsidiary companies are wholly owned, with three Victorian companies having a minority ownership held by an additional shareholder.

ABN Group was recently named Australia’s second largest builder in the 2024 HIA Housing 100 Report, with 3,881 build starts. The Group’s businesses operate predominantly in the Perth metropolitan region, Bunbury and neighbouring regions, and Melbourne and surrounding regions. ABN Group employs over 1,900 people across Australia and has the largest apprentice training program in the country with approximately 120 participants currently engaged.

### Supply Chain

The Group’s direct suppliers are located in Australia. We have over 1,000 registered suppliers across 130 sector classifications. Our procurement expenditure in FY24 was AUD \$1.25b (FY23 AUD\$1.08b), with 99 per cent of expenditure paid to Australian-based suppliers. The majority of overseas products and services were IT and marketing subscriptions.

Our supply chain includes the following services and products:

- Construction services | Residential and commercial building services.
- Financial services | Mortgage management and mortgage broking.
- Property development services | Land development.
- Manufacturing | Kitchen and glazing component manufacturing.
- Support services | Executive management services, accounting & finance services, marketing, IT services, consultants, training providers, procurement services, human resources support.



# Governance and Management



As ABN Group has grown, we've recognised the value of external insight and expertise. The ABN Group Advisory Board ('the Board'), which includes our Managing Directors and CEO and several independent advisors, is ultimately responsible for the Group's governance, strategy, performance and management of risks and opportunities.

## Modern Slavery Act Committee & Action Plan

As part of its broader governance framework, in 2020, ABN Group established a Modern Slavery Act Committee ('the Committee') and developed an Action Plan to further the Group's capacity to effectively manage modern slavery risk and ensure compliance with the Act. The Committee comprises members of Procurement, Commercial Construction, Residential Construction, People/Human Resources and Group Finance across all major spend categories and meets regularly to update and track progress against the Action Plan.

The Committee comprises members with sufficient seniority to represent the entire Group and all its entities. The Action Plan covers tasks to be undertaken across policy and governance, risk, supplier remediation, training and communication, and reporting.

# Policies and Procedures

Our approach to modern slavery risk is supported by a Modern Slavery Policy, established in January 2020, alongside a broader framework of policies and procedures that are regularly reviewed. Our Group policies include the following:

1. Code of Conduct
2. Recruitment processes and General Terms & Conditions of Employment
3. Prevention of Bullying, Harassment and Discrimination Policy
4. Open Talk Policy (whistle blower protection)
5. Grievance Resolution Policy and Guidelines, and
6. Employee Assistance Program.

## Our Modern Slavery Policy Purpose

The Group is committed to limiting the risk of modern slavery occurring within its businesses, infiltrating its supply chains or through any other business relationship.

ABN Group expects all who have, or seek to have, a business relationship with any of our entities to familiarise themselves with our policy and to act in a way that is consistent with its principles.

We believe this policy in conjunction with our broader framework of policies provides clear direction that is accessible and understood by all stakeholders. This policy will be used to underpin and inform any statement on modern slavery that the Group or any of its entities is required to produce in accordance with the Act.

The Group's procurement, contractor and supplier procedures provide internal governance relating to the contracting of goods and/or services from external parties. The procedures outline ABN Group's procurement, tendering, engagement, authorisations, execution, and management of contracts. Suppliers and vendors that have formal contracts/agreements in place are made aware of the Act, and agree to represent, warrant, and undertake that it conducts its business in a manner that is consistent with the principles of the Act.





# Supply Chain Impacts



ABN Group's supply chains remain strong and resilient. However, we do acknowledge that the construction industry challenges, in particular the pressure on the residential construction sectors, continues to have an ongoing impact on global and domestic supply chains which could have an ongoing effect on our suppliers.

While these pressures have eased significantly in FY24, they will continue to impact the construction industry into FY25. To date, these pressures on the residential construction sector have not negatively impacted the Group's ability to implement its roadmap or capacity to include relevant information in ABN's Modern Slavery Statement.

The Group continues to maintain strong supplier relationships and foster open communication with suppliers about these risks. Evolving supply chains are considered in ABN Group's overall risk assessments of suppliers and we will work directly with suppliers should additional risks emerge with any individual suppliers.

ABN Group will continue to work closely with all Australian-based suppliers who source their products domestically or internationally.

To date, the pressures on the residential construction sector have not negatively impacted the Group's ability to implement its roadmap or capacity to include relevant information in ABN Group's Modern Slavery Statement.

# Modern Slavery Roadmap and Measures of Effectiveness

In FY2024, the Group has continued to focus on understanding the risks in our supply chain and the initiatives in our Action Plan to continue to strengthen management controls, improve the transparency of the Group's risk profile, and collaboration with suppliers where appropriate to further address modern slavery risk.

In particular, we have continued to focus on the following tasks:

1. Complete regular supplier risk assessments to address modern slavery risks.
2. Regularly review risk assessments to continue to ensure that a high standard of assessment is consistent across our supplier base.
3. Ensure relevant modern slavery clauses are included in agreements across all procurement categories.
4. Being vigilant to any changes to Modern Slavery requirements to ensure ABN Group policies and procedures are updated promptly if required.
5. Continually enhance awareness of modern slavery risks via training for all relevant staff.
6. Escalate and mediate any issues identified via the above measures.

## Risk detection

We will continuously review and assess risks within our supply chain to prioritise high-risk suppliers. We will do this by:

- Requiring moderate and high-risk suppliers to provide their modern slavery statements or modern slavery commitments to the Group.
- Conducting and documenting a comprehensive risk assessment of our supply chain annually, at minimum.
- Mandating all suppliers with an annual turnover exceeding AUD \$100 million to submit their Modern Slavery Statements to the Group. To the extent they

exist we will collect Modern Slavery Statements for suppliers under the threshold and strongly encourage key suppliers under the threshold to consider adopting this as a standard.

- Ensure all new and existing suppliers are incorporated into the Group's Risk Assessment process.

## Supplier screening

ABN Group will continue to monitor high risk suppliers according to sector classification, location and spend.

## Awareness training

ABN Group will continue training to equip our staff, suppliers and contract managers with the knowledge and skills to identify high risk suppliers and engage with them where appropriate.

## Supplier engagement

ABN Group will engage with high risk suppliers to determine the extent to which modern slavery risks are managed to ensure compliance with the Act and meet the Group's expectations on suppliers.

## Policy review

ABN Group will review and update policies and procedures based on the outcomes of our actions.

The Group is confident that the measures outlined above for tracking effectiveness are sufficient to identify and address modern slavery risks. ABN Group is committed to reporting our progress through annual Modern Slavery statements, and we look forward to collaborating with suppliers, sub-contractors, and industry partners as we work together to combat this global issue.



# Future Commitments and Continuous Improvement

In the upcoming reporting period, the Group's key focus will involve:

- Focusing on continuous improvement around our evaluation of supply chain risks.
- Engaging with suppliers and subcontractors to identify high-risk parties and work collaboratively to address potential risks.
- Establishing a clear internal process to address any instances of modern slavery identified within our supply chain.
- Expanding and enhancing modern slavery training for employees.
- The ABN Group Directors and all members of the Modern Slavery Committee have reviewed and approved this statement ahead of this submission on 20 December 2024.

Signed,

  
Dale Alcock  
Managing Director

Date

7/04/2025

  
Aidan Hooper  
Managing Director, Victoria

Date

07/04/2025

  
Andrew Roberts  
Chief Executive Officer

Date

07/04/2025







**ABN Group -  
Western Australia**

301 Vincent Street,  
Leederville WA  
**T** 08 9200 4500

**ABN Group -  
Victoria**

81 Lorimer Street,  
Docklands VIC  
**T** 03 9674 4580

[abngroup.com.au](http://abngroup.com.au)