



Modern Slavery
Statement
of the Masterton Group 2020

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A dark, moody photograph of a table with a vase of olive branches, a bust, and books. The scene is dimly lit, with a strong light source from the left creating highlights on the table and the objects. The background is a dark, textured wall.

INTRODUCTION

Introduction

INTRODUCTION

This Modern Slavery Statement is issued by the Masterton Group of Companies, being one of the most renowned and established privately owned and operated family businesses in the residential building sector in New South Wales. The Masterton Group of Companies is wholly owned by Masterton Corporation Holding Company Pty Ltd (ABN 055 692 825) and operates the related and subsidiary trading companies, Masterton Homes Pty Ltd, (ABN 002 873 047), New Living Homes Pty Ltd (ABN 152 611 713) and New Edge Homes (NSW) Pty Ltd (ABN 058 035 984). Each of these companies operate as separate and distinct companies in the residential building sector in NSW.

The Masterton Group recognizes the issues brought to light under the Modern Slavery Act 2018 (Cth) and that modern slavery practices in the supply chain of businesses can occur. The Masterton Group holds values that are contrary to any form of slavery in the supply chain of businesses whether that be in the form of slavery, servitude or any form of forced labour particularly which may involve children.

This Statement has been prepared in accordance with the reporting requirements of the Modern Slavery Act and outlines the steps taken by the Group to address the issue in its business operations and supply chains.



OVERVIEW OF THE MASTERTON GROUP

Established in 1962, as a pioneer of the residential home building industry in New South Wales the Masterton Group regards itself as an industry leader in all aspects of the building process. The Masterton Group of companies has a dominant presence in the residential building sector in NSW.

The three main building companies offer three complimentary models that address prospective buyers at various price points in the market. Masterton Homes Pty Ltd is the core business model and whilst it is a project builder also allows customers the flexibility to modify the design and essentially personalize the build. The company builds single storey dwellings, double storey dwellings and duplexes. New Living Homes Pty Ltd offers customers modern, affordable designs for construction mostly on greenfield sites with an emphasis on single storey project homes designs. New Edge Homes (NSW) Pty Ltd is aimed at new home buyers looking to build double storey homes on greenfield sites.

The Masterton Group has a presence throughout both the regional and metropolitan areas of NSW with its head office based at the Central Display Village at Warwick Farm, NSW. The Group also has a presence in all major Display Village operations including Homeworld and Housing World.

As active members of the leading residential builder associations and recipients of multiple awards for both home designs as well as work health and safety awards, the Group prides itself on its strong record of awards. The Group received no less than 32 awards from the Master Builders Association in the past 7 years, awarded predominantly for recognition as leaders in design. The Group has been awarded 64 awards from the Housing Industry Association in the past 4 years regarding a range of designs including best display homes, best residential building designer and best custom-built home across different categories of values.



STRUCTURE OF THE MASTERTON GROUP

The Masterton Group of Companies is wholly owned by Masterton Corporation Holding Company Pty Ltd (ABN 055 692 825) which owns and operates the related and subsidiary trading companies, Masterton Homes Pty Ltd, (ABN 002 873 047), New Living Homes Pty Ltd (ABN 152 611 713) and New Edge Homes (NSW) Pty Ltd (ABN 058 035 984).

Each of these companies operate as separate and distinct building companies in the residential building sector in NSW.

The Masterton Group completed construction on more than 800 homes in 2019 and more than 700 in 2020 comprising the following:

Masterton Company	2019 Completed dwellings	2020 completed dwellings
Masterton Homes Pty Ltd	531	471
New Living Homes Pty Ltd	301	206
New Edge Homes Pty Ltd	61	51
Total Group	893	728

The Group currently has in construction more than 550 jobs across the Sydney metropolitan area and the central coast and south coast regional areas.





SUPPLY CHAIN

RELEVANT SUPPLY CHAINS WITHIN THE BUILDING PROCESS

The business operations focus on the design and construction of residential dwellings from concept through to completion and as such the business structure spans the entire realm of the design and construction of a residential dwelling. The business relies upon services which include the skilled design services of architects and draftspersons through to the construction phase of the dwelling.

The construction process relies upon a supply chain of the provisions of labour and services and supply of materials for the construction of the dwelling. The Masterton Group engages suppliers comprising more than 1200 contractors spanning all aspects of the design and build process and employs more than 240 staff.

Design Phase

The design process of a project entails the engagement of qualified personnel. The Masterton Group focuses on sourcing personnel from local labour markets wherever possible. Masterton predominantly employs its staff and otherwise engages external service providers who are local and familiar with the design regulations and laws. This allows the Masterton Group to engage Australian workers wherever possible.

Building Phase

The building process however, is more complex as this process depends upon a supply chain whose focus is two pronged, namely, a supply chain comprising the following:

Labour - to be provided for the purpose of carrying out the physical building works; and

Supply of materials - required for the construction of the dwelling.

The building process spans the engagement of labour and materials including but not limited to site inspections and geotechnical testing, surveyors, engineers, construction supervisors, supply of all materials required to construct a dwelling from slab pour, construction of frames and trusses, brickwork, roofwork through to lockup of the dwelling. Fit out of the home requires labour and materials for painting, installation of all flooring materials, kitchen and bathroom, window furnishings and completion of all finishes to the dwelling.

Supply chains in the building phase

Wherever possible Masterton procures its labour and materials from suppliers who are locally based and with whom Masterton has established a solid business relationship founded upon solid common best business practices.



RELEVANT SUPPLY CHAINS WITHIN THE BUILDING PROCESS



Wherever a supplier sources material from overseas sources, Masterton has in place contractual requirements that include the requirement that the supplier acknowledge and comply with the Modern Slavery legislative requirements.

Contractor Management

It is a requirement that any contractor engaged by Masterton to carry out residential construction work must have in place a written agreement. Masterton therefore observes contractor management as follows:

Major Building Contractors and Suppliers

Masterton has in place supply agreements with large suppliers for the supply and installation of materials. This group of suppliers typically provide materials and provide the contractors who are skilled and experienced in the installation of the product. When major suppliers are engaged by Masterton it is a requirement that the following are provided to Masterton prior to any labour and materials supplied and carried out:

- i. Supply agreement - These agreements are mandatory and require contractors to observe all requirements as to safety in accordance with the Work Health and Safety legislation and regulations;
- ii. A copy of all Work Health and Safety documentation as required under the legislation and regulations;
- iii. A copy of the relevant Safety Management System, Risk Assessment forms, Site Safety Plan and any other relevant information as required under the Work Health and Safety legislation and regulations;
- iv. Copies of relevant current insurance policies as required pursuant to the terms of the Supply Agreement.

All contractors engaged to carry out building works are required to provide evidence of being fully qualified and licensed. This is a mandatory and fundamental requirement and is closely monitored to ensure that during the build process only skilled and qualified contractors carry out building works in accordance with relevant building laws.

Medium/Small Building Contractors

It is a requirement that where Masterton engages a supplier that operates as a medium to small business, including companies, partnerships and sole traders, that they are required to sign an agreement prior to the commencement of any residential building work with similar terms and conditions to the major suppliers as outlined above.

ASSESSMENT OF MODERN SLAVERY RISK IN THE SUPPLY CHAIN

In 2019 Masterton formed an internal “Modern Slavery Working Group” comprising key members of the senior management team. The Group has undertaken an internal assessment of its business practices with reference to the information referred to in the Commonwealth Modern Slavery Act and Guidance for Reporting Entities.

The *Modern Slavery Working Group* conducted a review to determine if the Masterton Group supply chain and business structure may expose the Group to potential modern slavery risks in its operations and the supply chain and identified the following key areas of risk based on the Masterton Group business model.

Assessment	Risk	Action to remediate and assess effectiveness of actions
Risk Assessment of supply of labour	Review engagement of contractors to ensure compliance with modern slavery requirements and guidelines and to act on potential risks when identified; Increase awareness of contractors to comply with modern slavery requirements and guidelines.	To ensure contractors are made aware of their obligations and to ensure that they implement practice and procedure to confirm that they acknowledge the modern slavery requirements. Subcontractor Agreements and Supplier Agreements to be updated to include mandatory observation of modern slavery provisions
Risk Assessment of supply of labour and materials	Review engagement of suppliers for supply of labour and materials to ensure compliance with modern slavery requirements and guidelines and to act on potential risks when identified; Increase awareness of suppliers of labour and materials to comply with modern slavery requirements and guidelines.	To ensure suppliers of labour and materials are made aware of their obligations and to ensure that they implement practice and procedure to confirm that they acknowledge the modern slavery requirements. Supplier Agreements to be updated to include mandatory observation of modern slavery provisions

EVALUATION ASSESSMENT OF MODERN SLAVERY RISK IN THE SUPPLY CHAIN

Following upon the identification of the key risk areas the Group has worked on addressing the risks, due diligence, remediation and assessing effectiveness of actions in Masterton's business operations with the following expected targets:

- To maintain pro-active steps to ensure that Modern slavery risks are avoided and monitored.
- To ensure that the Masterton Group complies with and actively ensures that its suppliers comply with the modern slavery requirements.
- To improve modern slavery issues and awareness with all contractors and suppliers.
- Ensure suppliers and sub-contractor trades sign an acknowledgment of their obligations regarding modern slavery requirements.
- To ensure that all suppliers and sub-contractors comply with legislative requirements as reflected in contractor agreements.
- To develop, document and measure key benchmarks for this action.



EVALUATION ASSESSMENT OF MODERN SLAVERY RISK IN THE SUPPLY CHAIN

The aforementioned targets will be achieved by the following matters being observed:

Embedding Due Diligence	Method	Action to remediate and assess effectiveness of actions
Embedding Due Diligence in supplier requirements	<p>Requiring suppliers to adopt a Code of Conduct containing requirements for compliance with modern slavery and to make this part of the terms of engagement.</p> <p>Integrating modern slavery due diligence, remediation and training processes within the agreements entered into with suppliers of labour and materials.</p> <p>Implementing a formal Policy regarding recognition of modern slavery provisions to ensure compliance with the Act and Guidelines;</p>	Implementation of remediation action as outlined in Method
Information instruction and training of employees and supplier awareness	<p>Ensure that suppliers, contractors and employees are aware of the modern slavery principles, guidelines and policy.</p> <p>Ensuring that suppliers adopt a Code of Conduct containing requirements for compliance with modern slavery and to make this part of the terms of engagement;</p> <p>Monitor contractor responses to adopting the Code of Conduct and Policy regarding recognition of modern slavery provisions and follow-up outstanding documentation from the contractors;</p>	Implementation of remediation action as outlined in Method
Monitoring and Reporting and Record keeping	Maintaining an accurate contractor's database; ensure documentation and compliance requirements.	To ensure that modern slavery provisions are observed and to confirm compliance measures.
Reviewing Audits and Compliance	Requesting contractors and suppliers to provide updated statements and information confirming the supplier's commitment and compliance with modern slavery provisions generally.	To ensure compliance with modern slavery requirements.

CONSULTATION PROCESS WITH SUPPLIERS

Masterton is committed to ensuring, where reasonably practicable, that consultation happens at all stages of the building process with its suppliers and contractors. Consultation has commenced via the Procurement Manager and updating the supply agreements to include the modern slavery provisions and acknowledgments on the part of the suppliers.



Suppliers have been updated in the Consultation process by ensuring that:

- (a) relevant modern slavery information and policy is disseminated to the supplier via Masterton's written agreements; and by
- (b) suppliers being given a reasonable opportunity to address the issues commensurate to their size of business and business practices.

Suppliers will also be required to acknowledge their obligations as part of the terms of engagement with the Masterton Group.



IMPACT OF COVID-19

THE IMPACT OF COVID 19

Covid 19 (Covid) has coincided with the reporting requirements of this Statement. As such Masterton considers it appropriate to address the impact of Covid and how it as a Group has addressed the issue. Masterton has taken steps to ensure that its suppliers, contractors, and employees abide by the relevant government rulings regarding Covid in the course of providing goods and services. Similarly, it introduced a requirement that its customers provide confirmation to Masterton that they too are Covid compliant insofar as the Covid regulations require individual citizens to be Covid compliant.

The Masterton Group has complied with relevant guidelines and government regulations regarding its operations. This has included Head Office, all sales centres and display homes being registered as CovidSafe with NSW Health requirements, the implementation of Covid Safety Plans and registration of "QR codes". The company also implemented the Masterton Group Action Plan and the Masterton Group Safe Workplace Guide, copies of which appear below. Notwithstanding the impact of Covid, the Masterton Group has remained in close communication with its suppliers and contractors with a view to meeting its building obligations with its customers. The Group continues to work with the challenges imposed by Covid.



MASTERTON GROUP CORONA VIRUS/COVID-19 ACTION PLAN

Further to the recent Groupwide email on 3 March 2020 addressing the Corona Virus/COVID-19, in light of the current warnings issued by the Department of Health and government bodies, the Masterton Group is invoking the following processes in order to meet its obligations as to the work health and safety of its staff, customers, contractors and suppliers. To this end the Masterton Group is taking steps in order to ensure that it complies with the Health Department warnings and guidelines which can be found at the following link: www.health.gov.au/health-topics/novel-coronavirus-2019-ncov.

Staff Travel

1. Staff who intend traveling interstate or overseas for work commitments are to ensure that such travel is essential or otherwise seek to make alternative arrangements or defer such travel. Where travel is essential there must be a sign off obtained from The Group Chief Executive Officer;
2. Staff who intend traveling overseas will need to advise their immediate Manager and the Human Resources Manager at least 14 days prior to travel dates and include details of destinations including transit stopovers. Such notice is to be given in writing. This is to enable appropriate measures to be put in place regarding any relevant "isolation period" upon your return.
3. Where staff are traveling overseas they should check the Australian Government "Smart Traveller" website at <https://www.smarttraveller.gov.au/news-and-updates/coronavirus-covid-19> for information concerning travel destinations and any applicable warning namely, "Do not travel" (which currently include China, Iran, South Korea and Italy), "reconsider your travel" (which currently include Japan and Mongolia); and "exercise a high degree of caution" (which may include countries not yet susceptible to the Corona Virus/ COVID-19 outbreak).
4. Where staff have travelled overseas the Health Department has published "Isolation Guidance" at https://www.health.gov.au/sites/default/files/documents/2020/03/coronavirus-covid-19-isolation-guidance_1.pdf. Staff are required to follow the procedures outlined therein where they undertake overseas travel. The Isolation Guidance information should be read in conjunction with information regarding the Corona Virus/ Covid-19 published on the World Health Organisation website at <https://www.who.int/>.
5. Any staff member who may have recently travelled overseas is required to advise the Human Resources Manager of their itinerary and confirm any transit stopovers where they may have stopped for short periods of time. This will be so that a determination can be made as to whether or not that staff member will be required to undergo the mandatory 14 day isolation period or whether it will be a voluntary isolation period in keeping with the Government Guidelines. If they have any signs of being unwell they should follow the procedures recommended by the Department of Health concerning medical advice and what they need to do to ensure that they comply with the Department of Health recommendations.
6. Where a staff member is required to undergo a 14 day isolation period Management will address each staff member on a confidential basis regarding leave arrangements.
7. Where staff members are either in mandatory or voluntary isolation, conditional upon Management's approval, arrangements can, if practicable, be put in place in order to facilitate staff members to work from home.

MASTERTON GROUP CORONA VIRUS/ COVID-19 ACTION PLAN

Staff Dealing with Customers

8. Staff dealing with customers at any time, where a meeting is proposed, will be required to ask customers:

- (i) whether the customer has recently travelled overseas; and
- (ii) whether the customer has recently been unwell; and
- (iii) whether they may have been in contact with any person who may have the Corona Virus.

Depending upon the response received staff will then need to make their own assessment as to whether they can proceed with the proposed meeting or whether it may need to be deferred. Where a staff member determines that the meeting needs to be deferred then attempts should be made to conduct the meeting using electronic means and if this is not possible, then the meeting should be rescheduled. If a staff member is unsure as to how to proceed they should speak to their Manager or Human Resources Manager or the Work Health and Safety Manager for guidance.

Staff will be required to make a recorded entry into Framework of the above. This will ensure that there is a contemporaneous recording that the above questions have been asked and provide an explanation for any delay in the proposed meeting. It will also provide confirmation to all Masterton staff that their health and safety will not be placed at risk in the carrying out of their day to day work duties.

Trades contractors and suppliers

9. It will be the sole responsibility of trades, contractors and suppliers to ensure that they take their own steps to comply with the Department of Health guidelines in response to the COVID-19. A letter will be sent to trades, contractors and suppliers to this effect. Supervisors have the right to ask any trades persons or suppliers at sites the same questions that staff is required to ask customers as referred to above. Subject to any response received, supervisors have the right to request that a tradesperson or supplier leave the site.

General

10. If any staff have concerns about their own safety and well being in relation to the COVID-19 they should contact their Manager who will then liaise with the Human Resources Manager and/or the Work Health and Safety Manager to advise of any concerns so that any necessary steps may be implemented if so required.

11. The information referred to above has referenced Australian Department of Health Guidelines as at today's date. In light of the current health concerns in the community staff members are reminded that they too have an obligation towards their workplace colleagues to ensure that the workplace remains a safe and healthy environment. Staff are expected to keep themselves abreast of the recommended procedures that are required to be put in place.

12. Senior Management wishes to assure all staff that appropriate steps are being put in place to ensure that the health and safety of all staff is not placed at risk. This Action Plan has been put in place in order to address the current concerns that are prevalent in the community. In the event that there are any significant changes to procedures and processes that the Department of Health may make at any time after the date of this Action Plan, Management will reassess the situation and may update the Action Plan so that is fully compliant with any changes that may be implemented and required to be actioned by business.

We thank you in anticipation of your co-operation.

Bob Heymel

Group Chief Executive Officer

12 March 2020

MASTERTON GROUP CORONA VIRUS/ COVID-19 SAFE WORKPLACE GUIDE

As part of the Masterton Group Action Plan for Corona Virus/COVID-19, the Masterton Group (Masterton) is providing the following update to staff, customers, contractors and suppliers. In keeping with the government and Department of Health Guidelines this document sets out the manner in which Masterton will be complying with the **National COVID-19 Safe Workplace Principles**. It also serves as an update to the requirements to be observed by everyone in the workplace which includes working in the office, at a construction site, one of the display villages and/or in the home environment.

National COVID-19 Safe Workplace Principles

Masterton acknowledges the Workplace Principles by instilling business and worker confidence in its commitment to communicating what constitutes best practice in prevention, mitigation and response to the risks presented by COVID-19. To the extent that the National COVID-19 Safe Workplace Principles impact on the operation of business, Masterton expressly invokes the following:

1. All workers, regardless of their occupation or how they are engaged, have the right to a healthy and safe working environment.
2. The COVID-19 pandemic requires a uniquely focused approach to work health and safety (WHS) as it applies to businesses, workers and others in the workplace.
3. To keep our workplaces healthy and safe, businesses must, in consultation with workers, and their representatives, assess the way they work to identify, understand and quantify risks and to implement and review control measures to address those risks.
4. As COVID-19 restrictions are gradually relaxed, businesses, workers and other duty holders must work together to adapt and promote safe work practices, consistent with advice from health authorities, to ensure their workplaces are ready for the social distancing and exemplary hygiene measures that will be an important part of the transition.
5. Businesses and workers must actively control against the transmission of COVID-19 while at work, consistent with the latest advice from the Australian Health Protection Principal Committee (AHPPC), including considering the application of a hierarchy of appropriate controls where relevant.
6. Businesses and workers must prepare for the possibility that there will be cases of COVID-19 in the workplace and be ready to respond immediately, appropriately, effectively and efficiently, and consistent with advice from health authorities

The National SafeWork Principles can be found at the following link:

<https://www.safeworkaustralia.gov.au/covid-19-information-workplaces/other-resources/national-covid-19-safe-workplace-principles>

MASTERTON GROUP CORONA VIRUS/ COVID-19 SAFE WORKPLACE GUIDE

General

Masterton acknowledges the Workplace Principles by instilling business and worker confidence in its commitment to communicating what constitutes best practice in prevention, mitigation and response to the risks presented by COVID-19. To the extent that the National COVID-19 Safe Workplace Principles impact on the operation of business, Masterton expressly invokes the following:

- All persons are expected to practice social distancing as per the Health Department Guidelines which can be found at the following link: <https://www.health.gov.au/news/health-alerts/novel-coronavirus-2019-ncov-health-alert/how-to-protect-yourself-and-others-from-coronavirus-covid-19/physical-distancing-for-coronavirus-covid-19>
- Allowing staff to work from home, where possible and practicable, subject to the requirements of the specific job.
- Being aware of how to spot symptoms which include (fever, cough, sore throat and shortness of breath) and make sure workers do not come to work if they are unwell. The following link has further information: <https://www.health.gov.au/news/health-alerts/novel-coronavirus-2019-ncov-health-alert/what-you-need-to-know-about-coronavirus-covid-19#symptoms>
- Ensuring the workplace is regularly cleaned and disinfected and displaying signs and posters around the workplace to remind workers and others of the risks of COVID-19 and the measures that are necessary to stop its spread.
- In implementing the above practices Masterton relies upon the information and guidance published by
- SafeWork Australia at the link described as "COVID-19 Resources Kit" at:

<https://www.safeworkaustralia.gov.au/collection/covid-19-resource-kit>

- A plethora of information is available from various authorities including the NSW government and federal government. For any staff members who require any further information, we suggest various others links including the following:

<https://www.nsw.gov.au/covid-19>;

<https://www.australia.gov.au>; and

Masterton acknowledges that Government Authorities are still in the process of formulating further guidance on COVID-19 and to the extent practicable, Masterton refers to the outline of recommendations currently made by SafeWork Australia.

To keep workers safe and in keeping with the recommendations made by SafeWork Australia, Masterton is continuing to do the following:

- All persons are expected to observe basic hygiene practices including washing of hands and using alcohol based hand sanitizer as per the Health Department and Guidelines which can be found at the following link: <https://www.health.gov.au/news/health-alerts/novel-coronavirus-2019-ncov-health-alert/how-to-protect-yourself-and-others-from-coronavirus-covid-19/good-hygiene-for-coronavirus-covid-19>

MASTERTON GROUP CORONA VIRUS/ COVID-19 SAFE WORKPLACE GUIDE

Return to Work in the Office Environment

In addition to the National SafeWork Principles as outlined above, Masterton refers to the specific publication of SafeWork Australia for those workers who work in an office environment which can be found at the following link:

<https://www.safeworkaustralia.gov.au/covid-19-information-workplaces/industry-information/office>

Working on a Construction Site

In addition to the National SafeWork Principles as outlined above, Masterton refers to the specific publication of SafeWork Australia for those workers who work in an office environment which can be found at the following link:

<https://www.safeworkaustralia.gov.au/covid-19-information-workplaces/industry-information/office>

For those workers whose workplace is a residential construction site Masterton invokes the publications of the HIA, which have been circulated in previous emails. In this regard we refer to the following link for the relevant requirements to be observed at a construction site as published by the HIA: <https://hia.com.au/covid-19/managing-workplace-safety-and-employees-mental-health/making-space-on-site?cldee=bGVnYWxAbWFzdGVydG9uLmNvbS5hdQ%3d%3d&recipientid=-contact-f96b86e10883e811bf6e00155d01d603-f6746db7a8c748319377350dfdfdbd1f&esid=73a66083-f58f-ea11-b069-000d3acb9628>

It will be the sole responsibility of trades, contractors and suppliers to ensure that they take their own steps to comply with the Department of Health guidelines in response to the COVID-19. Further information as to safety practices can be accessed at the SafeWork Australia at the following link:

<https://www.safeworkaustralia.gov.au/covid-19-information-workplaces/industry-information/building-and-construction>

Working From Display Homes

Masterton will continue to follow the HIA Guide to "NSW Display Homes during COVID-19", which was recently also circulated and can be accessed at the following link:

<https://hia.com.au/-/media/HIA-Website/Files/covid19/nsw-making-space-on-site-display-home-covid19-A3.ashx?la=en&hash=E7348188ADE0F74104EA119A918A3DD8C820BB6F>

General

If any staff have concerns about their own safety and well being in relation to the COVID-19 they should contact their Manager who will then liaise with the Human Resources Manager and/or the Work Health and Safety Manager to advise of any concerns so that any necessary steps may be implemented if so required.

The information referred to above has referenced current Australian Department of Health and SafeWork Australia Guidelines. In light of the current health concerns in the community staff members are reminded that they too have an obligation towards their workplace colleagues to ensure that the workplace remains a safe and healthy environment. Staff are expected to keep themselves abreast of the recommended procedures that are required to be put in place.

Senior Management wishes to assure all staff that appropriate steps are being put in place to ensure that the health and safety of all staff is not placed at risk. By following the basic principles outlined above this will ensure that the Masterton work environment will be as compliant safe as it can be for any worker, regardless of their location whilst undertaking work duties.

We thank you in anticipation of your co-operation.

Bob Heymel
Group Chief Executive Officer
July 2020



CONTINUING COMMITMENTS

The Masterton Group continues to remain committed to ensuring that all of its suppliers within the supply chain detailed above remain committed to the continuing improvement and observation of all issues outlined in the Modern Slavery legislation and guidelines.

Masterton will implement the following additional measures;

1. Continue to have its Modern slavery Working Group monitor and assess continued commitment and compliance with modern slavery requirements.
2. Introduction of a code of conduct to be part of the terms and conditions of engagement of contractors and suppliers within the supply chain to ensure compliance with modern slavery requirements.
3. Ensure that all agreements entered into by the Masterton group with all suppliers include modern slavery obligations.
4. Continue to review any suppliers considered to be at risk.

CONTINUING COMMITMENTS

This statement has been approved by the Board of Directors of Masterton Corporation Holding Company Pty Ltd on 24 June 2021.



Signed by

David Masterton

Chairman and Director

