

# Modern Slavery Statement 2021





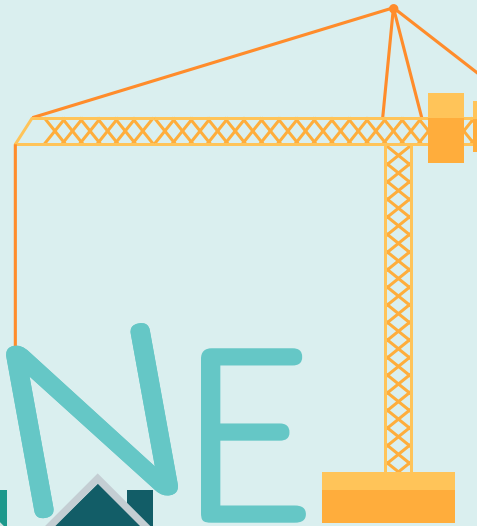
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PLACES



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EVERYONE



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## Introduction

**The Modern Slavery Act 2018 (Cth) (MSA) requires organisations with an annual consolidated revenue of more than AUD100 million to identify and report on the risks of modern slavery in their operations and supply chains, and the steps taken to address, assess and manage these risks.**

This Statement is submitted by St George Community Housing Limited (SGCH) under section 13 of the MSA to cover our first reporting period of 1 July 2020 – 30 June 2021. SGCH did not meet the reporting threshold in the prior financial year spanning 1 July 2019 – 30 June 2020.

### **Our Commitment**

In all our actions we are intentional about making a positive impact. We are committed to understanding and fulfilling our responsibilities to our customers, staff, partners and the communities we operate in. This is our first Modern Slavery Statement.

The MSA includes within the definition of modern slavery activities such as trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour (situations where children are subjected to slavery or similar practices, or engaged in hazardous work).

We are opposed to all forms of modern slavery. We are committed to the principles outlined in the MSA, to being transparent about our operations and supply chains, and the steps taken to address risks. We recognise our responsibility as an organisation of scale and our ongoing role in educating our Board, our staff and working with our suppliers and partners to address modern slavery. We acknowledge the expectations of our customers and stakeholders to actively address risks. We particularly acknowledge the diversity of our 11,500 customers and that past practices in Australia of slavery and

forced labour have impacted Aboriginal and Torres Strait Islander peoples and Pacific Islander peoples in particular.

As part of our commitment to continuous improvement as an organisation, we welcome the opportunity to understand and develop our approach to addressing modern slavery risks with a focus on our governance, our impact and our culture.

We are proud to present our first modern slavery statement which outlines the steps we have taken this last financial year to develop our approach. We will continue to build a framework that assists us to adapt and progress our capabilities to identify, assess and address these risks. We welcome feedback about this statement and expect to adapt our approach over time to demonstrate a growing awareness and improvement in our ability to address modern slavery risks.



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# 1

## Identification, Structure, Operations and Supply Chains

**Our vision is great places for everyone. Our business is people and places. We develop and manage sustainable, safe and affordable homes and work in partnership to create vibrant, inclusive communities.**

St George Community Housing Limited (SGCH) (ABN 32 565 549 842) is a Public Company limited by guarantee and a charity registered with the Australian Charities and Not-for-Profits Commission. Our registered office of SGCH is situated at Hurstville in NSW.

SGCH was established for the public charitable object of providing relief against poverty, distress and helplessness in Australia by providing secure, affordable and sensitively managed housing for people in need.

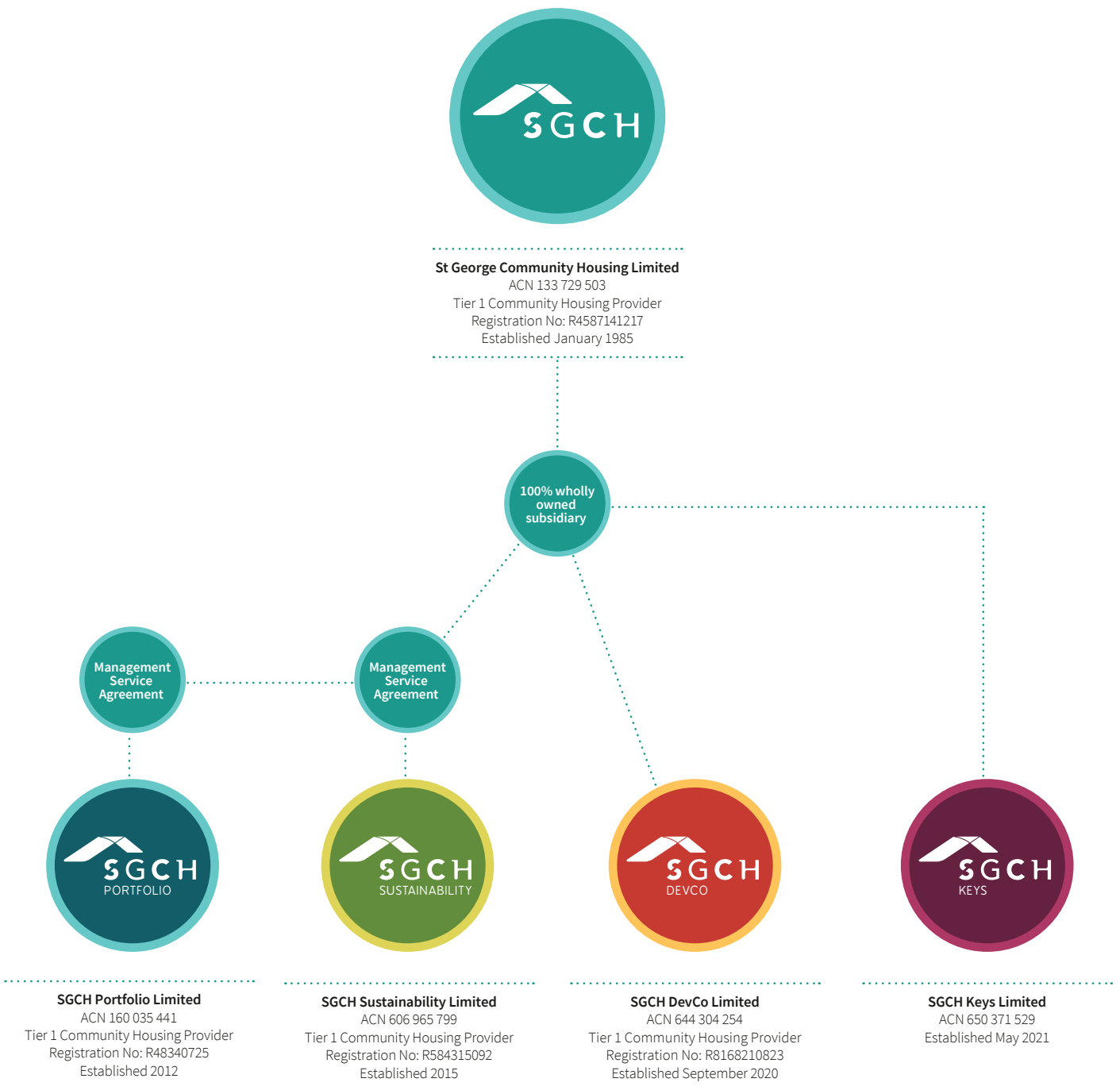


## Our Structure

SGCH, the parent company, wholly owns and controls four subsidiary companies: SGCH Portfolio Limited, SGCH Sustainability Limited, SGCH DevCo Limited and SGCH Keys Limited. A diagram of our corporate structure is included below. The four subsidiaries do not meet the reporting threshold under the MSA.

SGCH Portfolio Limited has been operational since November 2014 and SGCH Sustainability since July 2015. Both subsidiaries were established to hold a selection of assets against which we secured finance deals to create more homes and increase our impact.

In the past financial year, we established two new subsidiaries; SGCH DevCo Limited in September 2020, and SGCH Keys Limited in May 2021. Our strategic intent for these subsidiaries is to deliver future projects as part of our capital strategy.



## Our Operations

Founded in 1985, we now provide a place to call home for almost 11,500 people in 7,000 properties across the Sydney metropolitan region. We are recognised as a Tier 1 provider under the National Regulatory System for Community Housing. We bring capability and capital to work in partnership with governments, developers and builders, financiers and investors, community groups and individuals within the community.

Our team provides a range of corporate service functions including finance, human resources, information technology, communications, legal, governance and risk.

We have 228 employees including 200 permanent employees, 1 casual employee and 27 contractors. Approximately 4 employees are on visas, although these visas do not tie specifically to SGCH. We use recruitment agencies in circumstances

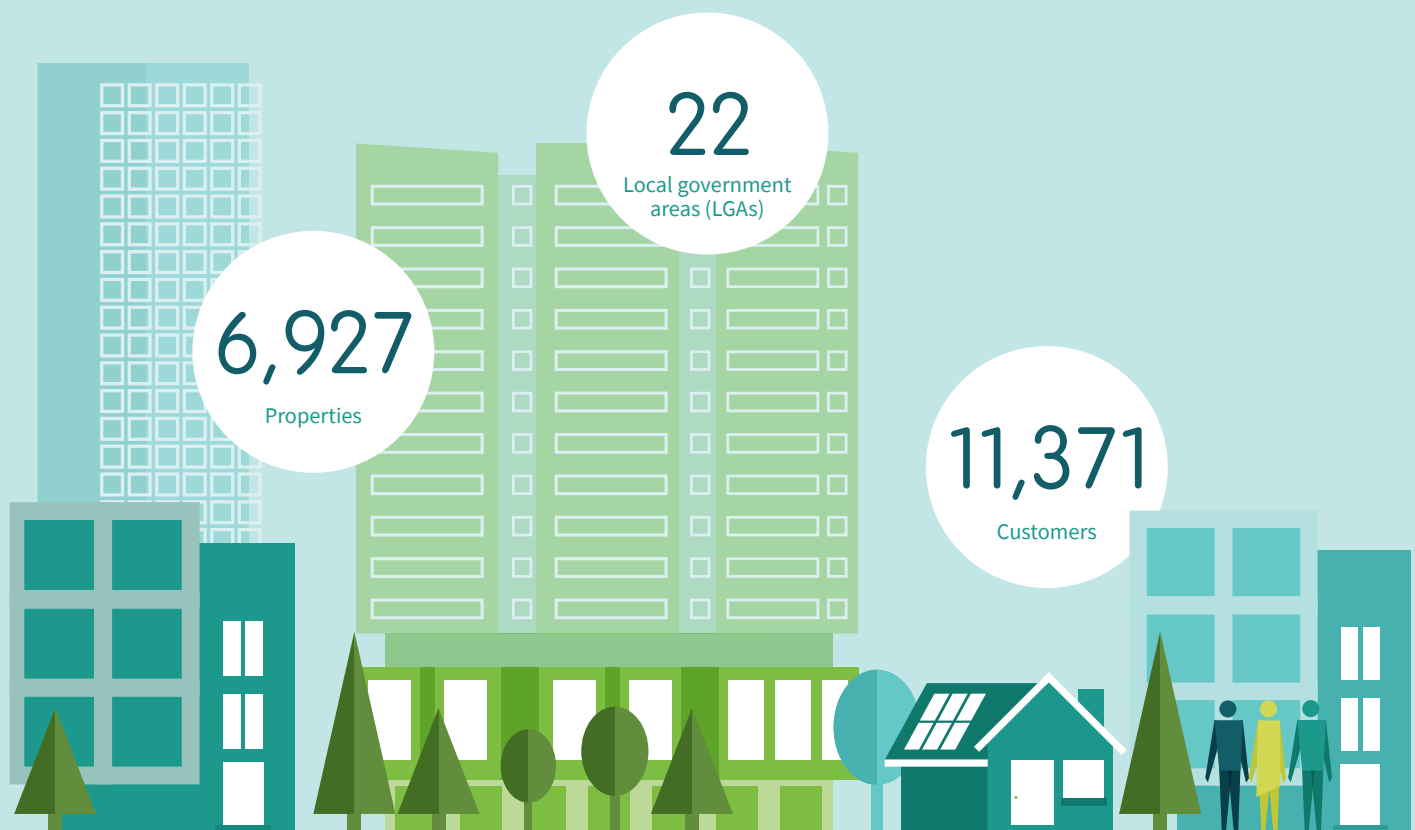
where we need short-term resourcing solutions, have low impact from internal recruitment solutions, or require assistance sourcing a specialised role.

The majority of our assets are owned residential housing investment properties and rights of use assets in respect of residential leases. We also manage residential housing assets on behalf of the NSW state government, various local governments and other not for profit organisations, including Aboriginal Land Councils. These property based investments are all located in metropolitan Sydney and therefore we consider they pose a low risk in relation to modern slavery geographically. However, we are aware that those same properties require management, repairs, maintenance, cleaning and associated activities and have discussed the risks that these activities pose in relation to modern slavery (refer section 2. Risks).

We hold cash on deposit and short term investments that we use to fund our development pipeline, support our existing loans and working capital obligations. We invest strategically to grow our property portfolio and increase the impact we can have in the lives of our current and future customers. In future reporting periods we will look to assess whether we may have any exposure to modern slavery risks through our cash and short-term investments.

We own, manage and operate properties across 22 local government areas (LGAs) in the Sydney metropolitan area. Our operations consist of:

- Tenancy management;
- Asset management;
- Development and construction.



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### Tenancy management

Our portfolio comprises a mix of social housing, Aboriginal social housing, transitional housing, affordable housing, key worker housing and specialist disability accommodation. We are recognised as industry leaders in tenancy management, with a practice that places tenant outcomes at the centre of our work.

We deliver tenancy management services through four functions:

- Allocations - new tenancies allocated in accordance with Housing Pathways
- Tenancy management - in accordance with the Residential Tenancies Act 2010 (NSW) and NSW Community Housing Policies
- Income management - all rent and income subsidy reviews in accordance with NSW Community Housing Rent Policy, and;
- Customer feedback - independent to ensure complaints and appeals are treated sensitively and fairly.

### Asset management

Our Property Management team manages over \$3.46 billion of assets - including those we own and those we manage on behalf of others.

For the purpose of facility operations and maintenance, our asset management portfolio is divided into two geographical regions and delivered by Multi-Trade Contractors.

### Development

We have a dedicated in-house team experienced in development and project management, across residential and major urban regeneration projects. Our team works with a range of consultants, architects, builders and contractors to deliver our development pipeline.





## Our Suppliers

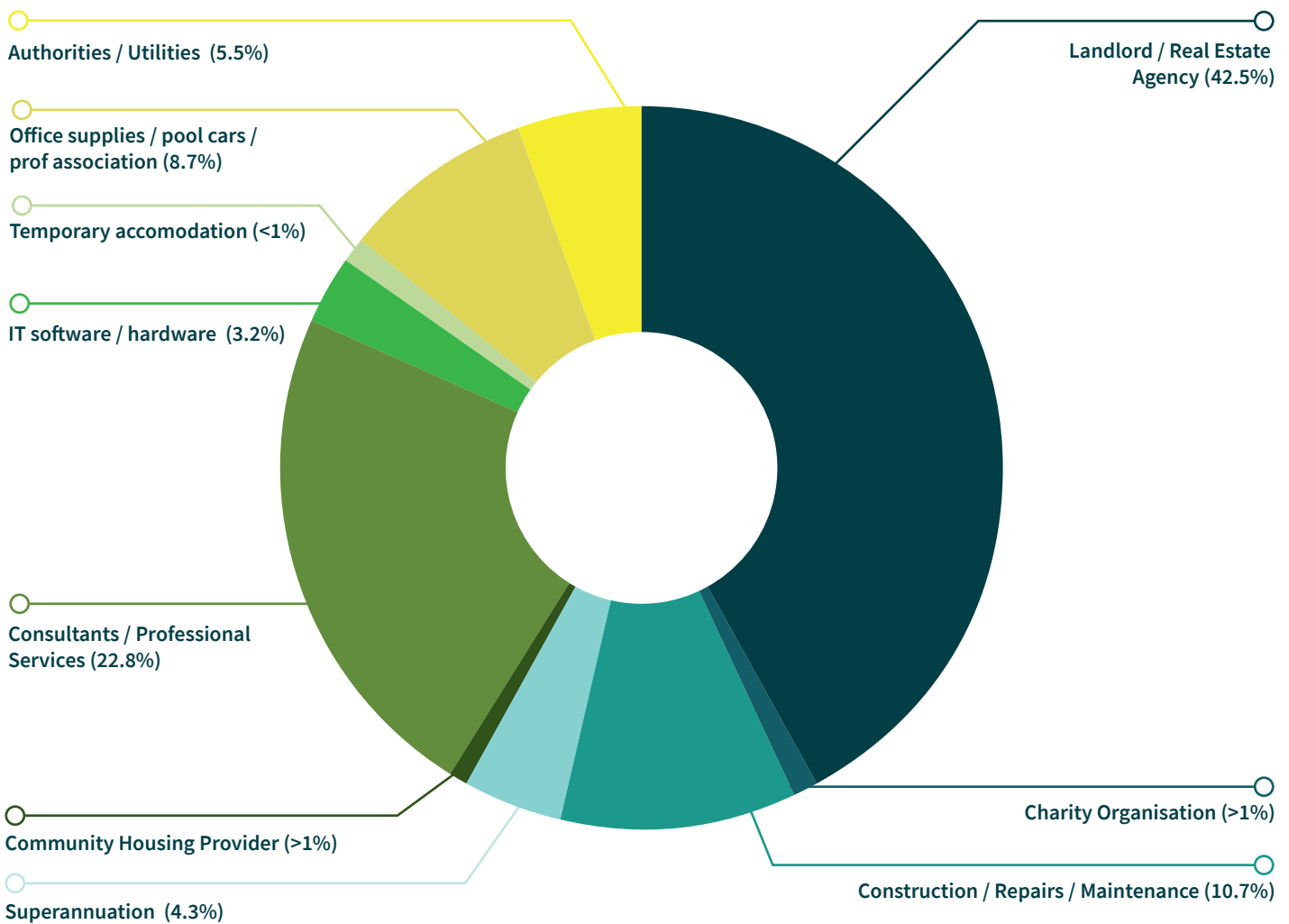
Tier 1 of our supply chain is made up of approximately 750 suppliers. Tier 1 suppliers are those with whom SGCH directly contracts for the provision of goods and/or services. We acknowledge that our supply chain extends beyond the first tier to include companies with which we do not have direct contractual relationships. Due to operational constraints, such additional tiers of suppliers have not been considered in the preparation of this statement. Our tier 1 suppliers are almost

entirely based in Australia, with only around 0.9% of suppliers being based overseas in locations including the United States and Singapore.

Our tier 1 suppliers include providers of information and technology software and hardware; utilities; postage; building and construction; repairs and maintenance; legal and financial services; security services; architectural and engineering services; urban

planning, surveyance and environmental services; recruitment agencies; insurance; real estate agents; transport; stationery and furniture; cleaning services and products; embroidery and uniforms; signage; and groceries and catering.

### Our suppliers in 2021



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# 2

## Risks

**We understand modern slavery is complex and exists in many forms. We know modern slavery exists in every country, including our own. We understand that the prevalence of modern slavery means that every entity has risks of modern slavery occurring within its operations and supply chains.**

We have commenced the process of identifying the risks that we may cause, contribute to, or be directly linked to modern slavery through our operations and supply chains.

### Operations

We understand that modern slavery can impact many different individuals but that there are some cohorts in our society that are more vulnerable to exploitation than others, and that migrants and individuals with cultural and language barriers, children and women, less-skilled workers and those with financial difficulties are particularly vulnerable to modern slavery. A large cohort of our customer base are these same individuals and therefore may be particularly vulnerable to modern slavery. We note under the MSA we are not required to report on modern slavery risks associated with how our customers use our products and services. However, we recognise that our interactions with this customer base as part of our operations may increase the risk that we are linked to modern slavery.

Our Homes team works to build, renovate and repair houses, and we understand that global estimates are that around 18% of modern slavery victims are found in the construction industry. We are also aware that building materials are often sourced from high-risk geographic locations. The construction industry can involve high demand for less-skilled labour as well as long and complex supply chains with a high degree of subcontracting. Our participation in this industry is an area of higher risk for us.

### Supply Chains

We acknowledge that 750 suppliers is a significant number of suppliers for an entity of our size and therefore requires increased diligence to maintain visibility over those suppliers to reduce the risk of modern slavery posed by each.

On the supply chain mapping we have completed so far we have identified overseas based suppliers in locations including the United States and Singapore. We note that neither of these locations are particularly high-risk according to the literature and the Global Slavery Index, however given the Singaporean suppliers are in a higher risk location than Australia we will endeavour to review those suppliers further in future reporting periods. The remaining suppliers are based in Australia, which is a low-risk location.

We also have some suppliers that operate in higher risk industries, or with higher risk goods and services according to the literature, including suppliers of: information and technology software and hardware; building and construction; repairs and maintenance; security and cleaning services; stationery and furniture; embroidery and uniforms; and groceries and catering. We recognise use of recruitment agencies may lead to reduced visibility over our own workforce and the different conditions and circumstances attached to our workers' employment.

We will continue to learn more about our supply chain, in particular secondary tiers of suppliers, in order to assist in increasing accuracy in risk identification in future reporting periods.

### COVID-19

We understand that COVID-19 has caused unprecedented pressures on societies, world economies and businesses. These pressures have led to business closures, increasing unemployment, decreased job stability, budgetary tightening, changes in demand and supply, wage-cuts, order cancellations, increased transportation costs, port congestion and general uncertainty. We know that a consequence of this is the increase in vulnerability of many workers worldwide, including potentially in our operations and supply chains, so that the risk of exploitation of those workers through modern slavery is considered an increased risk.

# 3

## Actions and Effectiveness

**We are making a concerted effort to address and assess the modern slavery risks we identify in our operations and supply chains, and to assess the effectiveness of the actions we take in this space. We have adopted a continuous improvement approach and aim to build on our capabilities each year.**

### Operations

We are committed to complying with all Australian workplace laws including the *Fair Work Act 2009 (Cth)*. All of our employees are provided with employment contracts detailing the conditions of their employment and their various rights and obligations.

We have held a modern slavery workshop with key staff members, guided by external experts, in which we educated staff about the MSA

and modern slavery and we developed plans and strategies in this space. We have briefed our Board on the MSA and discussed modern slavery with our Board. Our Board approved a three year initial strategy to address modern slavery risks in our operations and supply chain and to meet our annual reporting obligations.

Our strategy involves various targets laid out for the next three years and which we will continually review for effectiveness. We have formed a modern slavery working group, sponsored and steered by group executives and with representatives from all our functions and operations. The working group was established to coordinate effort in delivering on our Board approved strategy and associated work plans. The working group meets regularly as required, initially and

currently meeting fortnightly to progress and review our approach in this space. The Board is kept regularly updated on progress of the working group.

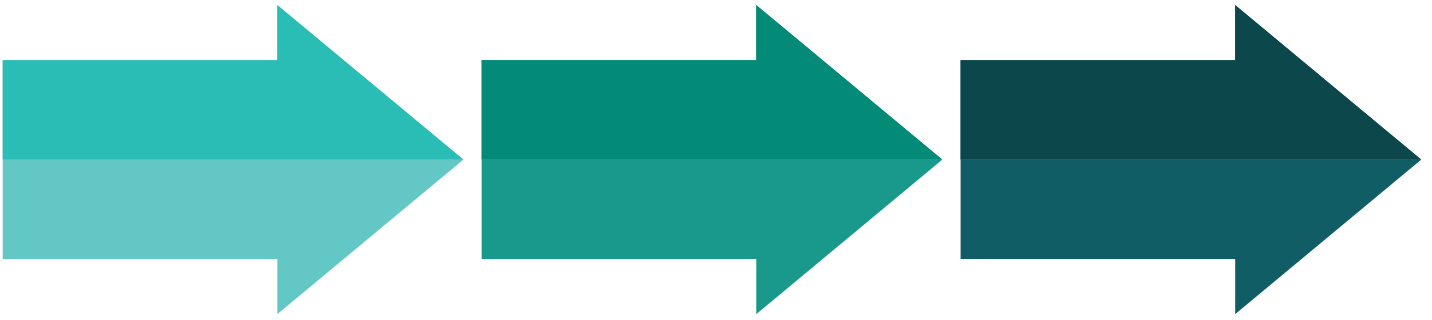
Our modern slavery working group is set to complete a further workshop and training session to equip the group to progress risk identification processes and implement further due diligence actions throughout our business.

Our approach to managing the risk of modern slavery in its procurement processes is based on the principles of its Risk Management Framework. This Framework applies a consistent approach to assessing and treating risks once they are identified and is compliant with AS ISO 31000:2018 Risk Management - Guidelines.



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## Our strategy to address modern slavery



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### 2021

- Develop Modern Slavery Policy
- Engage and educate staff
- Develop Modern Slavery Protocol
- Develop Supplier Questionnaire and map supply chains.

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### 2022

- Review and develop Modern Slavery Framework and associated documents
- Engage with staff and stakeholders for continuous improvement
- Further develop capabilities in supply chain mapping to better understand where our high-risk areas are so that we can target same more accurately and efficiently
- Consider opportunities to leverage industry collaboration in this area, both to establish efficiencies and to strengthen our approach as a more effective force for change
- Engage with suppliers.

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### 2023

- Well established processes and internal capabilities
- Engage with staff and stakeholders for continuous improvement
- Highly developed risk assessments and understanding of operations and supply chains, including tier 2 suppliers
- Progression of possible industry collaboration efforts.

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## Policies and Procedures

We are in the process, with the assistance of external modern slavery experts, of drafting for approval a specific Modern Slavery Policy, developing its modern slavery framework and associated documentation and tools. We already have included modern slavery clauses in our Multi-Trade Contractor contracts. The framework will need to be further considered, reviewed and then rolled out into the company with the necessary training and awareness amongst staff.

We also have multiple other current policies that inform our approach to our culture and the protection of our workforce, suppliers and customer base including:

- Care and Protection of Children and Young People Policy
- Contractor Management Workplace Health and Safety Responsibilities Policy
- Directors Code of Conduct
- Drug and Alcohol Policy

- Employee Health and Wellbeing Policy
- Notifiable Incidents Policy
- Procurement Policy
- Responsive Maintenance Policy
- Risk Policy
- Sharing Information with Police Policy
- Violence and Abuse Prevention Policy
- Volunteers Policy
- Vulnerable Tenants and Occupants Policy
- Whistleblower Policy
- Workplace Behaviour Policy, and;
- Workplace Health and Safety Policy.

We also have a Code of Conduct and Ethics which explains the minimum standards of behaviour that we expect from our staff including the use of our corporate values to make decisions that align to our purpose.

We understand that the nature of modern slavery is such that many victims are unable to draw attention to their circumstances for fear of retribution and hence it is often hidden. We have a Whistleblower Policy which clearly

sets out the circumstances around protected disclosures in our business and encourages the reporting of particular matters including corrupt conduct, criminal or illegal conduct and unethical or other serious improper conduct. We have appointed a number of Whistleblower Protection Officers, engaged an independent external whistleblower reporting service to receive reports, and encourage people to report actual or suspected misconduct.

## Supply Chain Mapping

We have commenced mapping of our supply chain and examining the risks to people within same. We have sought expert advice on how to undertake this exercise in a meaningful way and have broken down our tier 1 suppliers by geographic location, category of goods and services and spend. Using resources such as the Global Slavery Index, we have begun to identify which of our suppliers are higher risk than others.

### Supplier Modern Slavery Protocol

We have a planned approach to engage with our suppliers about modern slavery. We have also drafted a Supplier Modern Slavery Protocol (the Protocol) to advise suppliers of our expectations in this area and mandate their compliance. The Protocol includes various remedial mechanisms in the event of non-compliance. We will aim to roll out this Protocol over the coming reporting period.

We will, wherever possible, choose to partner with suppliers who support and strengthen our response to modern slavery. The Protocol refers suppliers to a number of relevant laws and guiding materials including:

- *Fair Work Act 2009 (Cth)*
- *Modern Slavery Act 2018 (Cth)*
- *Australian Criminal Code Act 1995 (Cth)*

- Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework
- Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, and;
- ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.

The Protocol seeks to also educate suppliers on the definition of modern slavery and requires that they comply with various laws and instruments, as well as our expectations in relation to their own risk assessments and due diligence processes. The Protocol allows us to audit our suppliers and requires that suppliers provide for safe reporting mechanisms in this

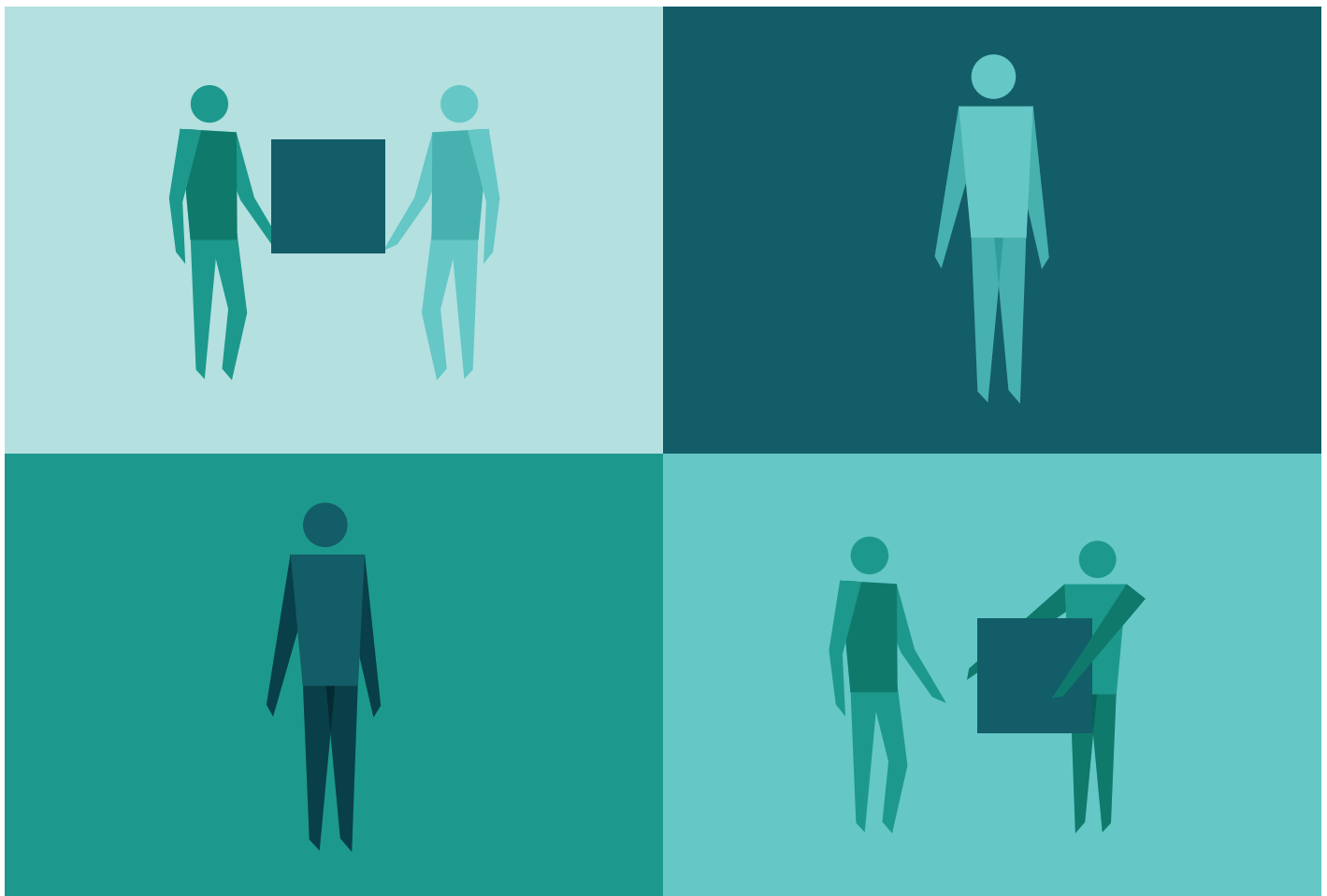
space. Suppliers are informed that referral action to proper authorities will be taken in cases involving breaches of the criminal law.

### Supplier Contracts

We are in the process of reviewing our current contract templates to understand whether amendments are required to ensure our suppliers meet our expectations in the space of modern slavery including providing us with the information we require to ensure our own compliance with the MSA.

### Supplier Questionnaire

We have drafted a detailed supplier questionnaire to support us to identify and assess the risks of modern slavery within our supply chain. We will develop and review this to ensure it is fit for purpose and apply in a targeted way.

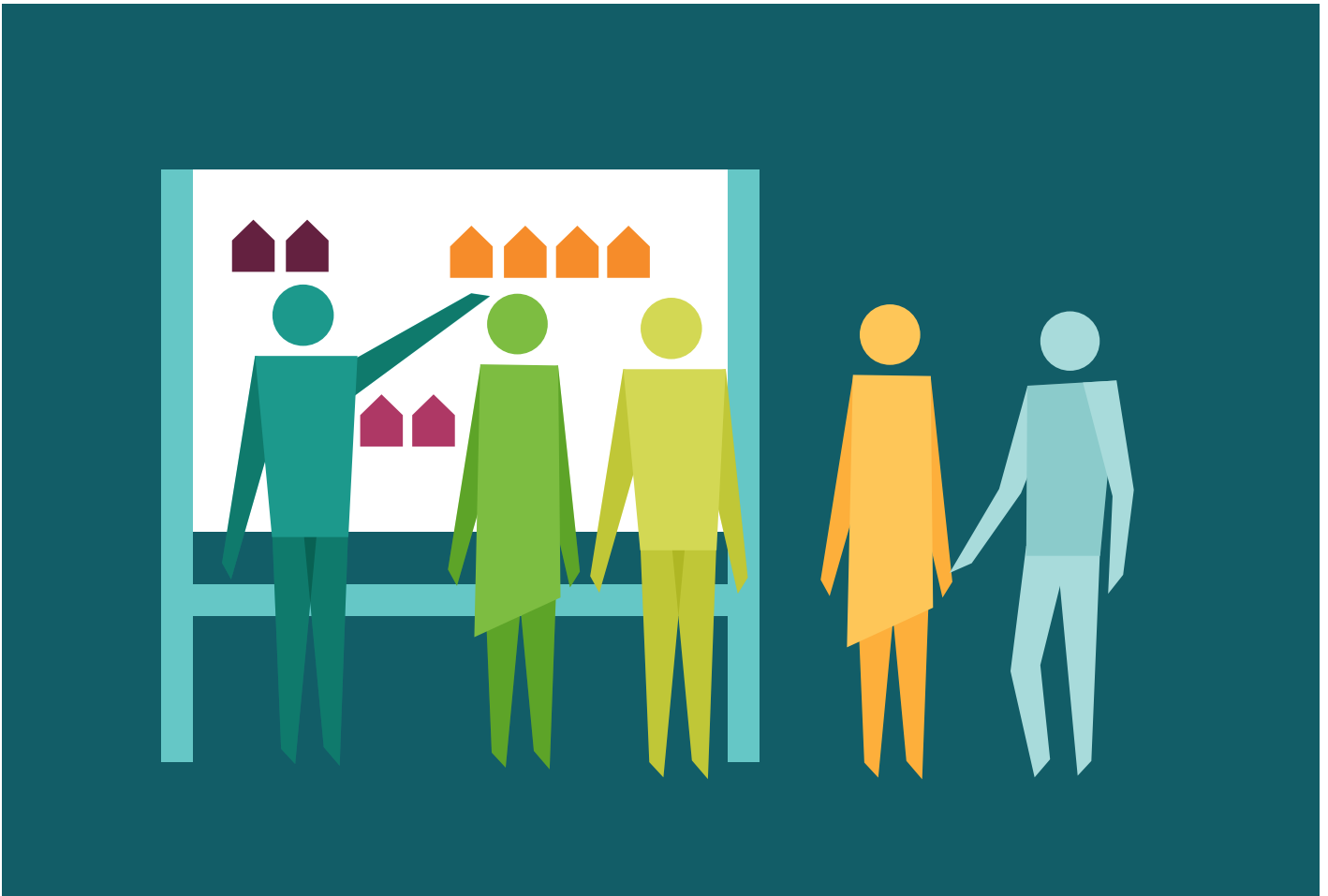


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# 4

## Consultation

This Statement is provided on behalf of SGCH Group which wholly owns four subsidiaries. The four subsidiaries share the same directors, executive teams and employees as SGCH. Each subsidiary adopts the same policies and processes and shares the same supply chain. This Statement was created through collaboration between representatives of all business divisions.



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# 5

## From our Governing Body

SGCH makes this Statement in accordance with section 13 of the Modern Slavery Act 2018 (Cth). SGCH's Board of Directors is its principal governing body for the purpose of the Modern Slavery Act 2018 (Cth). This Modern Slavery Statement was considered and approved of by the Governing Board of SGCH on 2 December 2021.



Annette Gallard  
Chair of the Board of Directors of SGCH  
Responsible Member of SGCH's Principal  
Governing Body

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# Modern Slavery Statement 2021



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