

 eden brae  
homes  
*It's where you want to live.*



# MODERN SLAVERY STATEMENT

PERIOD ENDED 31 DECEMBER 2022



# REPORTING

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This statement was approved by the board of Eden Brae Holdings Pty Ltd (“Eden Brae”) pursuant to Section 16 of the Modern Slavery Act 2018.



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Todd Symons  
**Company Director**

May 2023

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Date



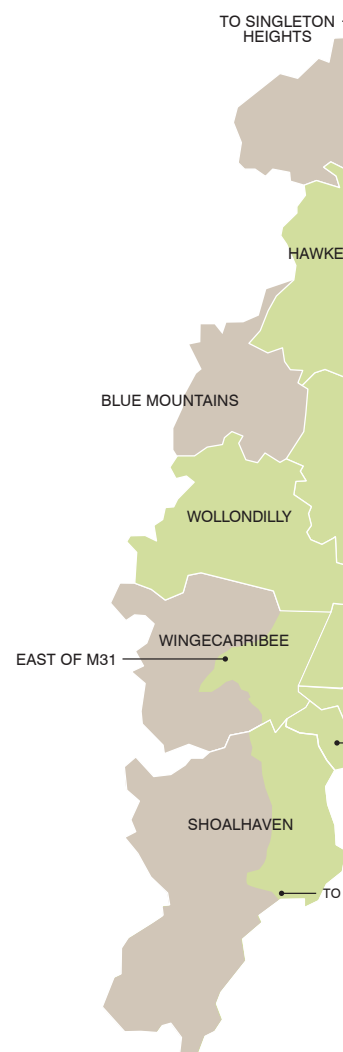
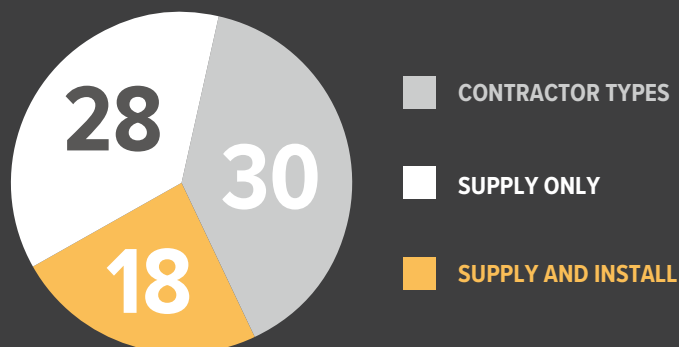
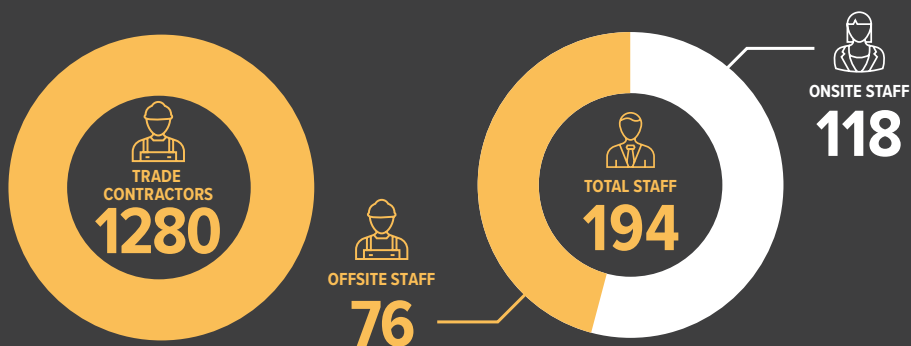
# BUSINESS FRAMEWORK

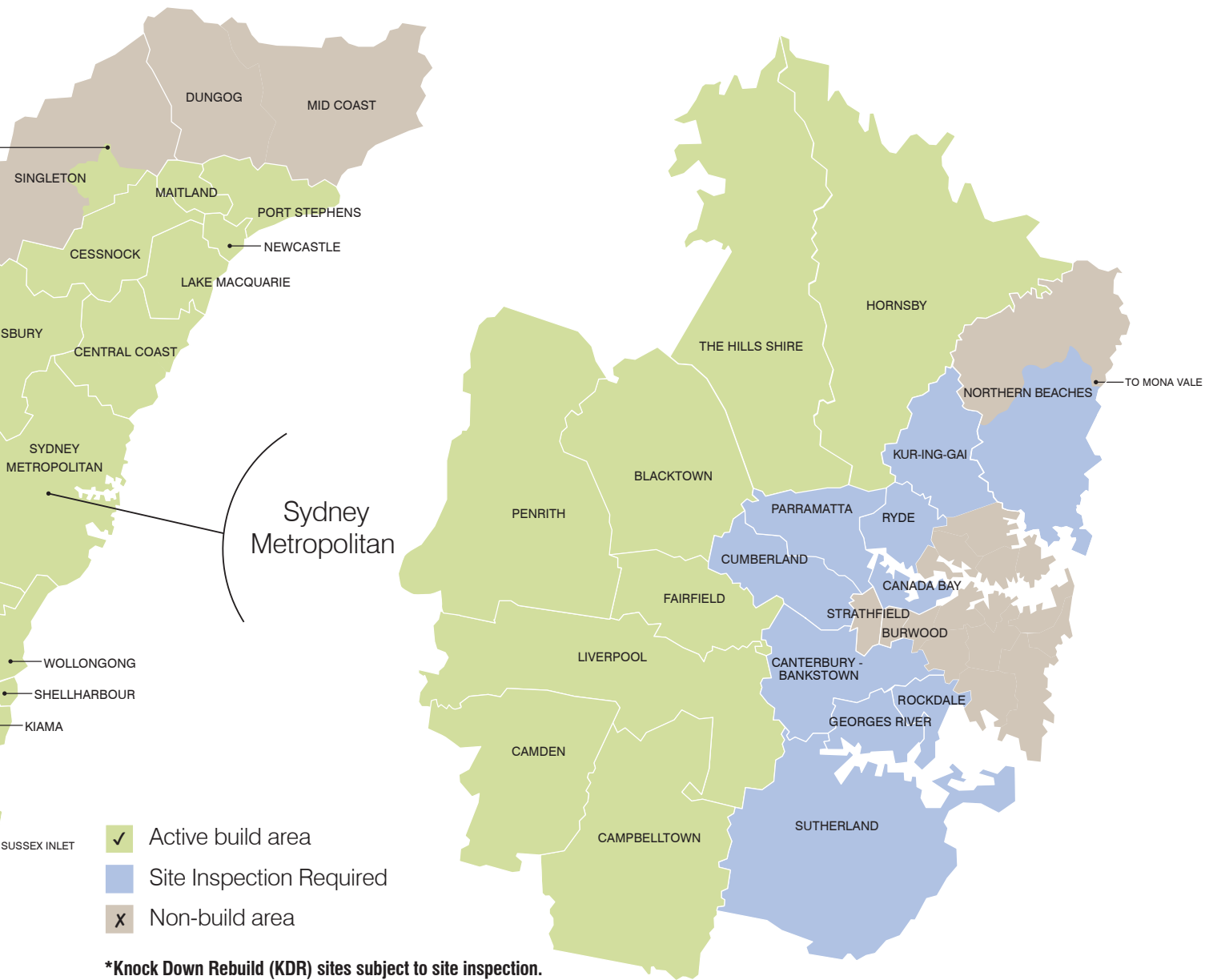
Eden Brae is a privately owned Australian residential builder operating in NSW. We undertake construction in an area including Sydney metro and expanding to the Central Coast, Newcastle and Hunter regions in the north, and to the Illawarra in the south.

Our business engagement profile is primarily a labour force comprising local contracting businesses e.g. concreters, carpenters, bricklayers, electricians.

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

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

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.

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.

## FY2022 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

Eden Brae applies a risk management approach when assessing the risk of modern slavery within our operations. Our initial stages focussed on increasing corporate knowledge, mapping out the milestones of key activities and the mapping/risk assessment of suppliers and their sourcing of (raw) materials including labour.

Our contractor 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

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	165	Installation only*

\* These organisations are contracted on an order by order basis and no labour hire organisations are engaged











# REMEDIATION

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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.

## EFFECTIVENESS

Effectiveness of our actions will be measured 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.

There was significant disruptions to undertaking subsequent steps during 2021 and 2022 due to COVID restrictions and supply chain challenges. 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

General and direct consultation will be guided by the risk mapping of our suppliers/contractors. Consultation will aim to increase awareness across our supply chain by working directly with suppliers/contractors whose operational contexts are linked to higher PIRs.



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