



Modern Slavery Policy (Version 2.0)

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1. Introduction

Community Housing Limited Group of Companies (CHL) is committed to the protection of workers' human rights and vulnerable individuals from exploitation and all forms of slavery. This policy is aimed at ensuring all employees are socially responsible through an awareness of modern slavery, the risks of slavery and the appropriate action to take in such circumstances. CHL aims to limit the risk of modern slavery occurring within its activities, existing within its supply chains, or other activities or relationships.

2. Policy Application

This policy and related procedures are applicable to Community Housing Limited Group of Companies (CHL) in Australia and includes the operating entities of; Community Housing Ltd (CHL), Community Housing (Vic.) Ltd (CHVL), Community Housing (TAS) Ltd (CHTL), and Community Housing (QLD) Ltd (CHQL) and any other entities within the CHL group which adopt this policy.

3. Aim

This policy is intended to ensure compliance with the *Modern Slavery Act 2018* (Commonwealth) ('*Act*'), as amended from time to time. The policy will be used as the basis for making modern slavery statements under the *Act*.

4. Principles

CHL promotes the wellbeing and livelihood of each individual and as such, will address any concerns of slavery both within the organisation, suppliers and third-party relations. CHL will commit to the following:

- Ensure that our approach to dealing with modern slavery concerns are transparent and in accordance with our obligations under the *Act*;
- Seek to create a working environment free from any forms, or threats of, slavery;
- Enact reasonable controls and risk management procedures to ensure modern slavery is not occurring in our business or supply chains;
- Encourage and communicate with staff to ensure they are aware of the complaints procedure and reporting requirements; and
- Respond in a timely and appropriate manner to any complaints of slavery.

4.1. SLAVERY

The modern concept of "slavery" is not limited to traditional notions of slavery involving physical restraints but rather an umbrella term designed to encapsulate the deprivation of freedom and violation of human rights.

'Slavery' includes:

- all forms of human trafficking (including, but not limited to, human and organ trafficking); forced labour or services;
- forced or servile marriages;
- deceptive recruiting for labour or services;
- debt bondage;
- slave-like practices;
- sexual servitude;
- the worst forms of child labour as defined in the *Act*; and
- conduct that would constitute an offence under existing human trafficking, slavery and slavery-like offence provisions set out in Divisions 270 and 271 of the *Commonwealth Criminal Code Act 1995* (Cth).

Slavery and slave-like practices are operationalised through governmental, legislative and/or judicial guidance and are consistent with Australia's international obligations. Slavery and slave-like practices are criminalised in Australia and may extend to beyond jurisdictional requirements.

CHL has a zero-tolerance to modern slavery within its operations and supply chains.

4.2. EXAMPLES

Key indicators of modern slavery in the course of business may include typically harsh working conditions, harsh and or excessive working hours, low or no payment and workers being isolated. Minority groups are likely to be disproportionately impacted by modern slavery due to structural and institutional disadvantages.

Relevant examples of slavery include, but are not limited to:

- Employees of a construction company working 12-hour days for a basic minimum wage without access to any legally-entitled employment benefits;
- A company which provides building materials employing children (generally under the age of 12) to produce the goods;
- Employees of a construction company engaging in 'debt bondage': forcing individuals to work as repayment of a loan;
- An employer withholding an individual's identity and travel documents until they complete a certain number of manual labour hours.

CHL is under a legal obligation to address the risk of slavery in scenarios such as the above. CHL should either ensure working conditions are improved before engaging with such companies, or refrain altogether from engagement.

Modern slavery does not include, for example:

- Genuine volunteers of CHL, who are engaged in accordance with the Volunteers Policy; or
- Harsh employment, either generally or at a particular time or place.¹

4.3. WHO THIS POLICY APPLIES TO

This policy applies:

- to all persons who work for the CHL group, including employees, volunteers, agents ("Staff"); and
- in consideration of relationships formed with contractors, agencies, consultants and other third parties. ("Suppliers").

4.4. RISK MANAGEMENT

Effective risk management and internal control procedures are the key to dealing with actual and potential instances of modern slavery. Risk management and control procedures apply to overseas operations and international supply chains which are established.

CHL commits to enacting internal control procedures and undertaking risk assessments of its operations in Australia and overseas.

Managers have delegated responsibility for ensuring risks of slavery are adequately addressed. To the extent that it affects their respective area and department, management must assess modern slavery within their sphere of operations.

Upon notification, suspicion or identification of a risk of slavery, managers are to be proactive in reducing the threat of actual slavery occurring. For example, if a company has a history of human rights abuses, an alternative company should be sought to engage.

The risk assessment process aims to result in an understanding of operations and supply chains at global and local levels. The objective of this assessment is to identify high risk areas, such as geographical and sector risks, in Australia and the overseas countries we operate in or obtain supplies from. Details of the risk assessment process will be recorded in the risk management system.

¹ *R v Tang* [2008] HCA 39, [42].

Furthermore, the Modern Slavery Statement under the *Act* must include a description of the risks of modern slavery practices in CHL's operations and supply chains, and subsidiaries that CHL owns or controls. In addition, the Modern Slavery Statement will include the steps taken to assess and manage the risk.

5. Reporting

Under the *Act*, any Australian entity with a consolidated annual revenue of \$100 million or above is a reporting entity, including government and private corporate and non-corporate entities. Information will be made publicly available regarding modern slavery risks and mitigation strategies within supply chains. The *Act* also provides for voluntary compliance for an entity with less annual revenue if it is an Australian entity or carries on business in Australia.

5.1. RISK MINIMISATION

- Once an individual becomes aware of slavery or a risk of slavery, they are required to act within the scope of their position to minimise this risk as soon as possible. Furthermore, CHL Staff are under an obligation to report on all suspicions and incidents of modern slavery to the Group Company Secretary.

5.2. SUBMISSION OF MODERN SLAVERY STATEMENT

CHL, as a reporting entity, is required to submit a Modern Slavery Statement to the Minister for Home Affairs (or their authorised delegate) for each financial year, which will require information regarding:

- the entity's structure, operations and supply chains;
- the risks of modern slavery;
- any actions taken to minimise those risks; and
- the processes that have been undertaken to assess and minimise risks, including any consultations with other entities within their ownership or control.

It is anticipated that the statements will be required to be submitted within six months of the completion of each financial year. It is expected this statement will be publicly-available and published by the Department of Home Affairs (Cth). The statements must be approved by the CHL Board and signed by a responsible member.

5.3. RESPONSIBILITY FOR MODERN SLAVERY STATEMENT

Responsibility for developing and coordinating the annual modern slavery statement is placed with Head of Risk and Compliance.

6. Related legislation, industry frameworks and standards, CHL policy and procedures

6.1. EXTERNAL LEGISLATION AND FRAMEWORKS

Modern Slavery Act 2018 (Commonwealth)
Migration Act 1958 (Commonwealth)
Modern Slavery Act 2018 (NSW)
Criminal Code Act 1995 (Commonwealth)
Universal Declaration of Human Rights (UDHR)
Convention on the Rights of the Child (CRC)
UN Guidelines for the Alternative Care of Children

6.2. CHL RELATED POLICIES AND PROCESSES

International Operations Policy
Compliance Concern Form
Procurement Policy
Volunteers Policy

7. Monitoring and review

This document should be reviewed and revised periodically and/or as required. The period between reviews must not exceed three years. This document remains valid until such time that a new version is published.

Review history

Document reference	Date and version	Reason for review	Review frequency	Owner	Approver
POLHOUAUSNATMDS202302	Version 2.0, May 2023	Scheduled review	Every three years	Governance	Managing Director
POLHOUAUSNATMDS201901	Version 1.0, July 2019	New document	Every two years	National Manager Operations	Managing Director

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