

This policy and related procedures are applicable to the CHL group of companies (CHL) in Australia, including: Community Housing Limited, Community Housing (Vic) Ltd, Community Housing (Tas) Ltd, Community Housing (Qld) Ltd, Community Housing Investment (WA) Limited, Horizon Housing Realty Limited, Australian Affordable Housing Securities Limited, Community Housing Investment (QLD) Limited, Community Housing Investment (NSW) Limited, Community Housing (NT) Limited, Community Housing (Subi East) Limited, Community Housing (Homes For Regions) Limited, Building Communities Housing Limited and any other entities within CHL which adopt this policy.

Purpose and scope

This policy defines Community Housing Limited's (the organisation) commitment to the protection of workers' human rights and vulnerable individuals from exploitation and all forms of slavery, while promoting corporate sustainability and good governance. It ensures employees act responsibly through awareness of modern slavery, its risks, and appropriate responses.

Definitions

Modern 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. It 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.

Policy statements

1. The organisation 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.
2. The organisation will commit to the following:
 - 2.1. Ensure that our approach to dealing with modern slavery concerns are transparent and in accordance with our obligations under the Act.
 - 2.2. Seek to create a working environment free from any forms, or threats of, slavery.
 - 2.3. Enact reasonable controls and risk management procedures to ensure modern slavery is not occurring in our business or supply chains.
 - 2.4. Encourage and communicate with staff to ensure they are aware of the Feedback, Complaints and Appeals process and reporting requirements.
 - 2.5. Respond in a timely and appropriate manner to any complaints of slavery.
3. Managers will ensure they are continually assessing that no area of their delegated responsibility is engaged in modern slavery including contractors and suppliers.
4. Employees and Managers that become aware of slavery or a risk of slavery are required to act within the scope of their position to minimise this risk as soon as possible and report all suspicions and incidents of modern slavery to the Group Company Secretary.
5. The organisation, as a reporting entity, will submit a *Modern Slavery Statement* to the Attorney-General's Department (or their authorised delegate) for each financial year on:
 - 5.1. the entity's structure, operations and supply chains,

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- 5.2. the risks of modern slavery,
 - 5.3. any actions taken to minimise those risks,
 - 5.4. the processes that have been undertaken to assess and minimise risks, including any consultations with other entities within their ownership or control.
6. The Modern Slavery Statement will be submitted within six months of the completion of each financial year and must be approved by the organisation's Board and signed by a responsible member.

Accountability

Chief Governance Officer – accountable for authorising submission to the Executive Team for final policy endorsement by the Chief Executive Officer.

Senior Manager, Compliance and Reporting – responsible for reviewing and maintaining the policy, overseeing its effective implementation and providing advice.

All Employees – responsible for complying with the policy, actively supporting its implementation, and contributing to the achievement of its objectives. Failure to adhere to this policy may result in disciplinary action, up to and including termination of employment.

Related documents

- [Modern Slavery Information Sheet](#)
- [Modern Slavery Procedure](#)
- [Procurement Policy](#)
- [Safeguarding Policy](#)
- [Code of Conduct Policy](#)
- [Risk Management Policy](#)

Legislation

- Modern Slavery Act 2018 (Cth)
- Migration Act 1958 (Cth)
- Modern Slavery Act 2018 (NSW)
- Fair Work Act 2009 (Cth)
- Criminal Code Act 1995
- Universal Declaration of Human Rights (UDHR)
- Convention of the Rights of the Child (CRC)
- UN Guidelines for the Alternative Care of Children

Approved by

Approved by Danny Dracic, Chief Executive Officer on 27/10/2025.