

Modern Slavery Statement 2024



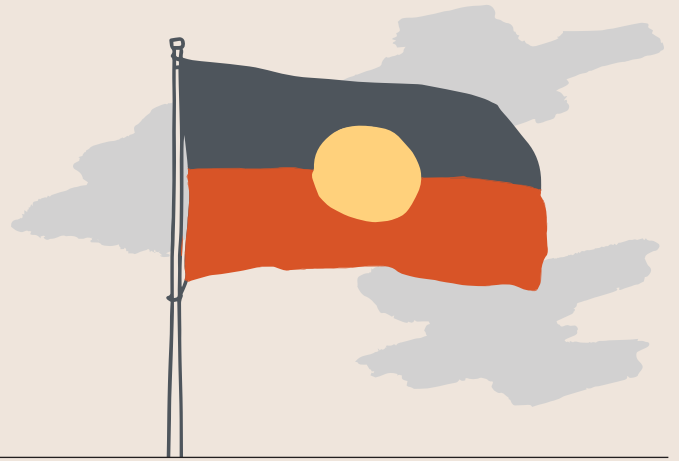
St George
Community
Housing





The beautiful work of First Nations creative Alysha Menzel adorns St George Community Housing's new offices in Liverpool and Redfern. An amalgamation of her two previously commissioned artworks – *Thriving Together* and *Connected Communities* – Alysha's newest design represents our mission to provide sustainable, safe and affordable housing as a foundation for individuals to connect with opportunities and build their communities.

Welcome



We acknowledge the traditional Aboriginal and Torres Strait Islander owners of the lands on which we operate and provide homes for people.

We acknowledge and pay our respects to past, present and future Aboriginal and Torres Strait Islander Elders, peoples and nations. We recognise Aboriginal and Torres Strait Islander peoples as having the world's oldest living, continuous culture with unique languages and spiritual relationships to the land and seas.

St George Community Housing (SGCH) is strongly committed to practical action aimed at building the physical, cultural, spiritual and family wellbeing of Aboriginal and Torres Strait Islander peoples through our role as a community housing provider.

We renew our determination to listen and to learn from Aboriginal and Torres Strait Islander peoples, to recognise the important contribution they make, and to offer a first-rate service that responds to the diversity of Aboriginal and Torres Strait Islander peoples and their communities.

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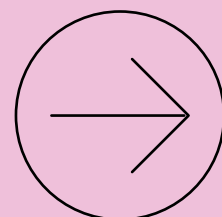
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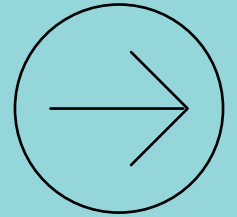
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From our governing body



Together we provide sustainable, safe and affordable housing as the foundation for our customers to connect to opportunities and build their communities.

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 reporting period of 1 July 2023–30 June 2024.

Our Commitment

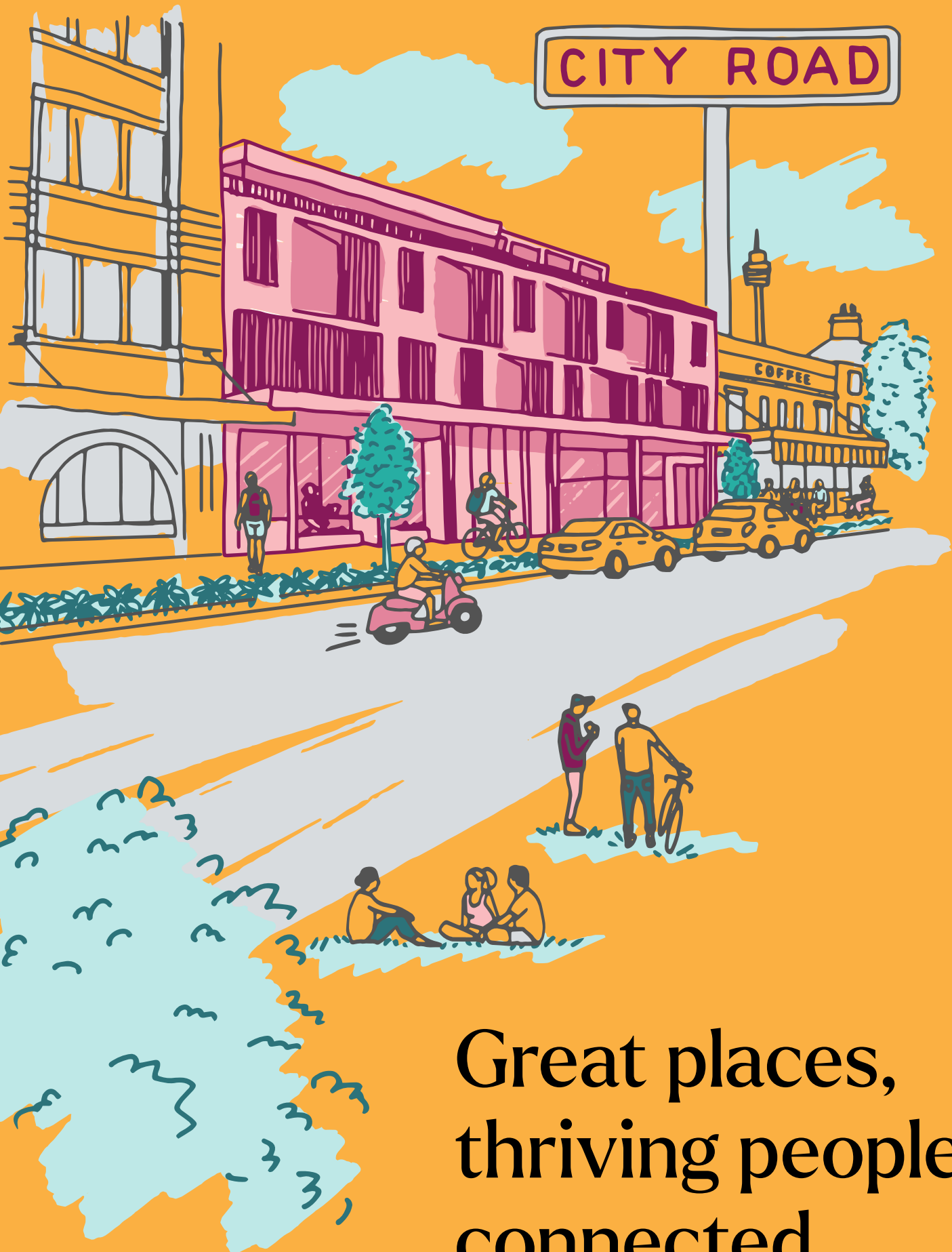
In all our actions we are intentional about making a positive impact. We are committed to understanding and fulfilling our responsibilities to our customers, staff, partners, and the communities we operate in.

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 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 acknowledge the diversity of our 11,435 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 FY23/24 Modern Slavery Statement, which outlines the steps we have taken this past financial year to develop our approach. We continue to build a framework that will assist us to adapt and progress our capabilities to more efficiently identify, assess and address these risks. We welcome feedback about this Statement and expect to continually adapt our approach to demonstrate a growing awareness and improvement in our ability to address modern slavery risks.



**Great places,
thriving people,
connected
communities.**

01 Identification, structure, operations and supply chains

Our vision is great places, thriving people, connected communities.

Together we provide sustainable, safe and affordable housing as the foundation for our customers to connect to opportunities and build their 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. The registered main office of SGCH is in Liverpool, 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 Limited, the parent company, its subsidiaries and an affiliated entity are registered with the Australian Charities and Not-for-profits Commission (ACNC). Its subsidiaries and affiliated entity are: SGCH Portfolio Limited, SGCH Sustainability Limited, SGCH DevCo Limited, SGCH Keys Limited, SGCH Homes NSW Limited, SGCH Homes Victoria Limited, SGCH Homes Queensland Limited, SGCH Homes Box Hill Limited, SGCH Homes Brunswick Limited, SGCH Homes WSP Limited and SGCH Keys Trust.

All subsidiaries and SGCH Keys Trust do not independently meet the reporting threshold under the MSA. However, each operating entity adopts the same policies and processes and shares the same supply chain. This Statement was created through collaboration between representatives of all business divisions.

The parent company and the subsidiaries SGCH Portfolio, SGCH Sustainability, and SGCH DevCo are required to meet the governance standards, and the performance outcomes mandated under the National Regulatory System Community Housing, against which they report annually to demonstrate compliance and maintain registration as a Tier 1 community housing provider. SGCH Homes Victoria Limited is registered as a Housing Provider in Victoria and is required to meet performance standards under the Housing Act 1983 (Vic) and to comply with annual reporting requirements of the Victorian Housing Registrar. Other subsidiaries in the SGCH Group are in the process of obtaining Community Housing Provider registration with the relevant State government agency. SGCH Keys Limited and SGCH Keys Trust are not registered in this system. SGCH Keys Trust is an unconsolidated structured entity.



St George Community Housing Limited
ACN 133 729 503
ABN 32 565 549 842
Tier 1 Community Housing Provider
Registration No: R4587141217
Established January 1985
ACNC Registered

SGCH | Portfolio

SGCH Portfolio Limited
ACN 160 035 441
ABN 88 160 035 441
Tier 1 Community Housing Provider
Registration No: R48340725
Established 2012
ACNC Registered

SGCH | Sustainability

SGCH Sustainability Limited
ACN 606 965 799
ABN 21 606 965 799
Tier 1 Community Housing Provider
Registration No: R584315092
Established 2015
ACNC Registered

SGCH | DevCo

SGCH DevCo Limited
ACN 644 304 254
ABN 30 644 304 254
Tier 1 Community Housing Provider
Registration No: R8168210823
Established September 2020
ACNC Registered

SGCH | Keys

SGCH Keys Limited
ACN 650 371 529
ABN 15 650 371 529
Established May 2021
ACNC Registered

SGCH | Homes
NSW

SGCH Homes NSW Limited
ACN 674 979 812
ABN 13 674 979 812
Established February 2024
ACNC Registered

SGCH | Homes
Victoria

SGCH Homes Victoria Limited
ACN 674 979 821
ABN 15 674 979 821
Established February 2024
Registered Housing Provider in Victoria
Registration No: 60
ACNC Registered

SGCH | Homes
Queensland

SGCH Homes Queensland Limited
ACN 674 979 830
ABN 17 674 979 830
Established February 2024
ACNC Registered

SGCH Keys Trust

SGCH Keys Trust
ABN 83 838 322 534
Established December 2023
ACNC Registered

SGCH Homes Box Hill

SGCH Homes Box Hill Limited
ACN 676 320 255
ABN 12 676 320 255
Established April 2024
ACNC Registered

SGCH Homes Brunswick

SGCH Homes Brunswick Limited
ACN 676 320 264
ABN 14 676 320 264
Established April 2024
ACNC Registered

SGCH Homes WSP

SGCH Homes WSP Limited
ACN 676 320 273
ABN 16 676 320 273
Established April 2024
ACNC Registered

Non-operating
Entities

Our operations

Founded in 1985, we now employ 267 staff and provide a place to call home for 11,435 people in 6,973 properties across the Sydney metropolitan region. We are recognised as a Tier 1 Community Housing 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.

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

The majority of our assets are owned residential housing investment properties and right-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. 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 those same properties require management, repairs, maintenance, cleaning and associated activities and have discussed the risks these activities pose in relation to modern slavery (refer Section 2. Risks).

We hold cash on deposit and short-term investments we use to fund our development pipeline and to 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 24 local government areas (LGAs) in the Sydney metropolitan area. Our operations consist of:

- Tenancy management
- Asset management
- Development and construction

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.

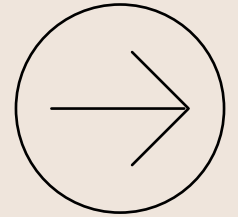
Asset management

For the purpose of facility operations and maintenance, our asset management portfolio is divided into two geographical regions and delivered in conjunction with third party multi-trade contractors.

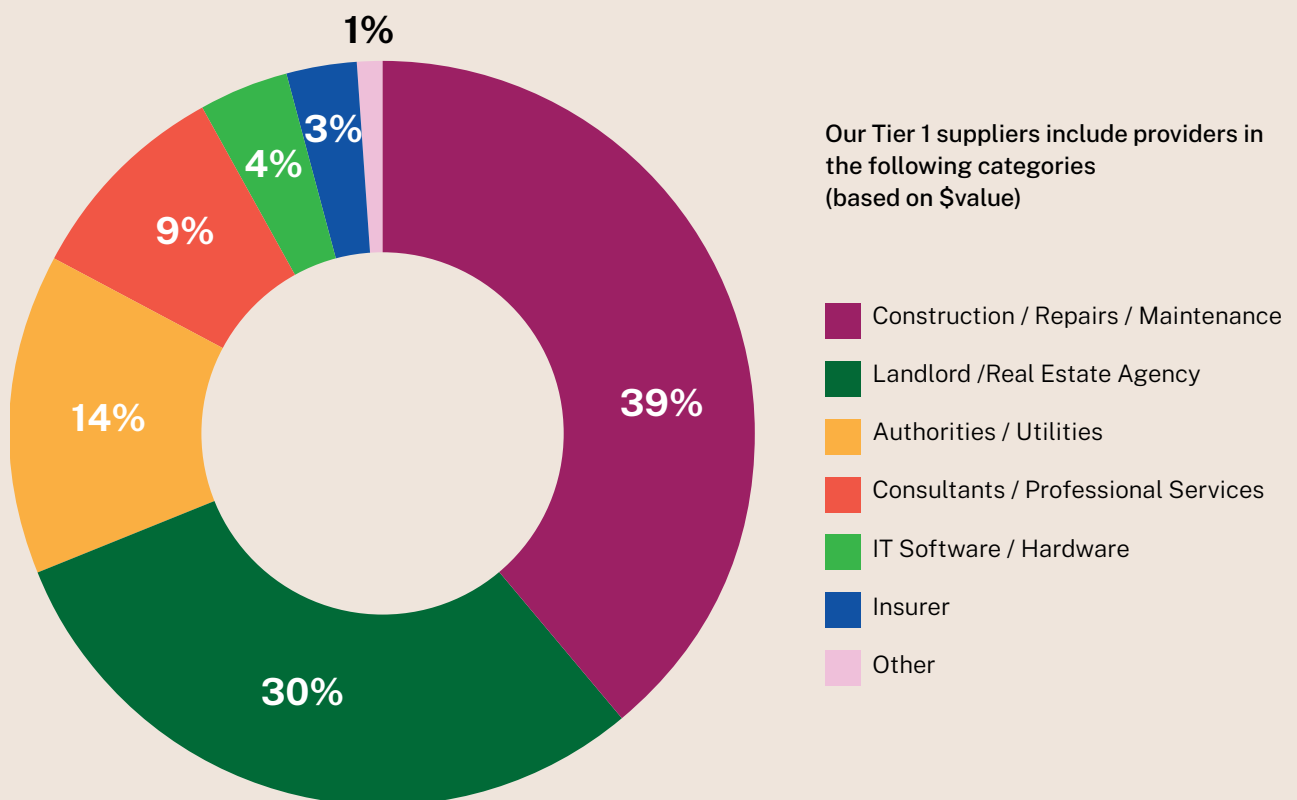
Development

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



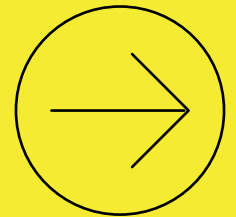
Our Tier 1 supply chain is made up of approximately 900 suppliers. Tier 1 suppliers are those with whom SGCH directly contracts for the provision of goods and/or services. We acknowledge our supply chain extends beyond the first tier to include companies with which we do not have direct contractual relationships. 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 a few of those suppliers being based overseas in locations including the United States, Singapore and Ireland.





02

Risks



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

We continually review our modern slavery risks in our supply chain. This review focuses on our higher-risk Tier 1 operations and supply chains.

Operations

We understand modern slavery can impact many different individuals but there are some cohorts in our society who are more vulnerable to exploitation than others. 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 our interactions with this customer base as part of our operations may increase the risk we are linked to modern slavery.

Our Homes team works to build, renovate and repair houses, and we understand globally that a large proportion of modern slavery victims are found in the construction industry. We are also aware 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 900 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. It should be noted that approximately half of these suppliers are private lessors and real estate agents engaged by SGCH as part of the Community Housing Leasing Program.

On the Tier 1 supply-chain mapping we have completed, we have identified overseas-based suppliers in locations including the United States, Singapore and Ireland. We note none of these locations are high risk according to the latest Global Slavery Index. 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, including suppliers of information 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 the use of recruitment agencies may lead to reduced visibility over our own workforce and the different conditions and circumstances attached to our workers' employment.

In future reporting periods, we will continue to learn more about our supply chain, in particular secondary tiers of suppliers, in order to assist us in improving risk identification.

03

Actions and effectiveness

We continue to make 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). Our employees are provided with employment contracts detailing the conditions of their employment and their various rights and obligations.

We will continue to develop modern slavery workshops with key staff members, guided by external experts. In these sessions we will educate staff about the MSA and modern slavery, and we will develop plans and strategies in this space.

Our current strategy involves various targets we will continually review for effectiveness. The Board is kept regularly updated on progress of our modern slavery initiatives.

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

Plans and achievements

2025

What we plan to achieve

- Create a mandatory e-training module for staff
- Enhance Modern Slavery Framework and processes
- Refine supplier surveys and questionnaires
- Further embed modern slavery considerations and requirements in procurement processes
- Pursue further dialogues on modern slavery within our industry
- Continuously risk assess the supply chain against the three risk indicators (Goods or Services, Sectors and Industries, Geographic Location)
- Assess our Risk Assessment Framework and Modern Slavery Framework and the effectivity of our actions for continuous improvement

2024

What we have achieved to date

- Continued assessment of our Tier 1 supply chain and engagement with suppliers
- Rolled out our Supplier Code of Conduct, which outlines our expectations on our suppliers with regards to modern slavery
- Encouraged awareness of modern slavery amongst staff through informative newsletters
- Examined our internal modern slavery processes and toolkits with a view to making improvements
- Planted the seeds of collaboration within our sector
- Kept abreast with modern slavery developments
- Prepared and submitted our fourth Modern Slavery Statement

2023

- Well established processes and internal capabilities
- Engaged with staff and stakeholders for continuous improvement
- Developed risk assessments and understanding of operations and supply chains, including medium risk Tier 1 suppliers
- Continued to gain a better understanding of our supply chain
- Prepared and submitted our third Modern Slavery Statement

2022

- Developed a Modern Slavery Policy for approval by our Board
- Developed a supplier questionnaire, mapped our supply chains and engaged with our higher risk Tier 1 suppliers
- Reviewed and developed Modern Slavery Framework and associated documents
- Engaged with staff and stakeholders for continuous improvement and implemented procedures in our procurement process which will help to highlight our Modern Slavery Framework and expectations at an early stage
- Further developed capabilities in supply chain mapping to better understand where our higher-risk areas are so that we can target same more accurately and efficiently
- Prepared and submitted our second Modern Slavery Statement

Policies and Procedures

We have a Modern Slavery Policy and are further developing our Modern Slavery Framework and associated documentation and tools. We have included modern slavery clauses in our multi-trade contractor contracts.

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:

- Contractor Management -Workplace Health and Safety Responsibilities Policy
- Directors Code of Conduct
- Drug and Alcohol Policy
- Hours of Work and Flexibility 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
- Work Health Safety and Wellbeing Policy, and;
- Workplace Behaviour 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.

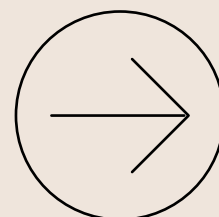
We understand that the nature of modern slavery is such that many victims are unable to draw attention to their circumstances for fear of retribution and hence it is often hidden. We have a Whistleblower Policy that sets out the circumstances around protected disclosures in our business and encourages the reporting of particular matters, including corrupt conduct, criminal or illegal conduct and unethical or other serious improper conduct. We have a number of Whistleblower Protection Officers, an independent external whistleblower reporting service to receive reports, and we encourage people to report actual or suspected misconduct.

Supplier Code of Conduct

We continue to engage with our suppliers about modern slavery.

In the 2024 period, we completed rollout of our Supplier Code of Conduct (Supplier Code) to all our suppliers. We will, wherever possible, choose to partner with suppliers who support and strengthen our response to modern slavery. The Supplier Code requires suppliers to comply with a number of relevant laws including:

- Fair Work Act 2009 (Cth)
- Modern Slavery Act 2018 (Cth)
- Modern Slavery Act 2018 (NSW) –for NSW Government Authorities
- 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 Supplier Code seeks to also educate suppliers on the definition of modern slavery and sets out SGCH's expectations on their compliance with various laws and instruments, and on their own risk assessments and due-diligence processes.

The Supplier Code requires cooperation from our suppliers to our reasonable requests in relation to assessing their compliance with the Supplier Code. Suppliers are informed that referral action to proper authorities will be taken in cases involving breaches of criminal law.

Supplier Contracts

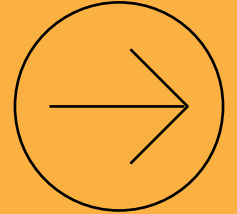
In the 2024 period, we continued to make certain that new contracts contained our required modern slavery clauses to ensure our suppliers meet our expectations, including providing us with the information we require to ensure our own compliance with the MSA. We also required suppliers we engaged with in tender processes to include their modern slavery policies and programs in their submissions. These were factored into our determination of the winning tenders.

Supplier Questionnaire

We continued our review of selected higher-risk Tier 1 suppliers and requested that they complete our supplier questionnaire and provide us their Modern Slavery Statement where available. This allowed us to further identify and assess the risks of modern slavery within our supply chain. After our review and after offering some guidance to some suppliers in identifying, assessing and addressing modern slavery risks that may be present in their operations or industry, we confirmed we were satisfied with the responses or statements of all of the respondents. Our doors remain open to our suppliers to assist and support them with awareness and compliance with modern slavery legislation.

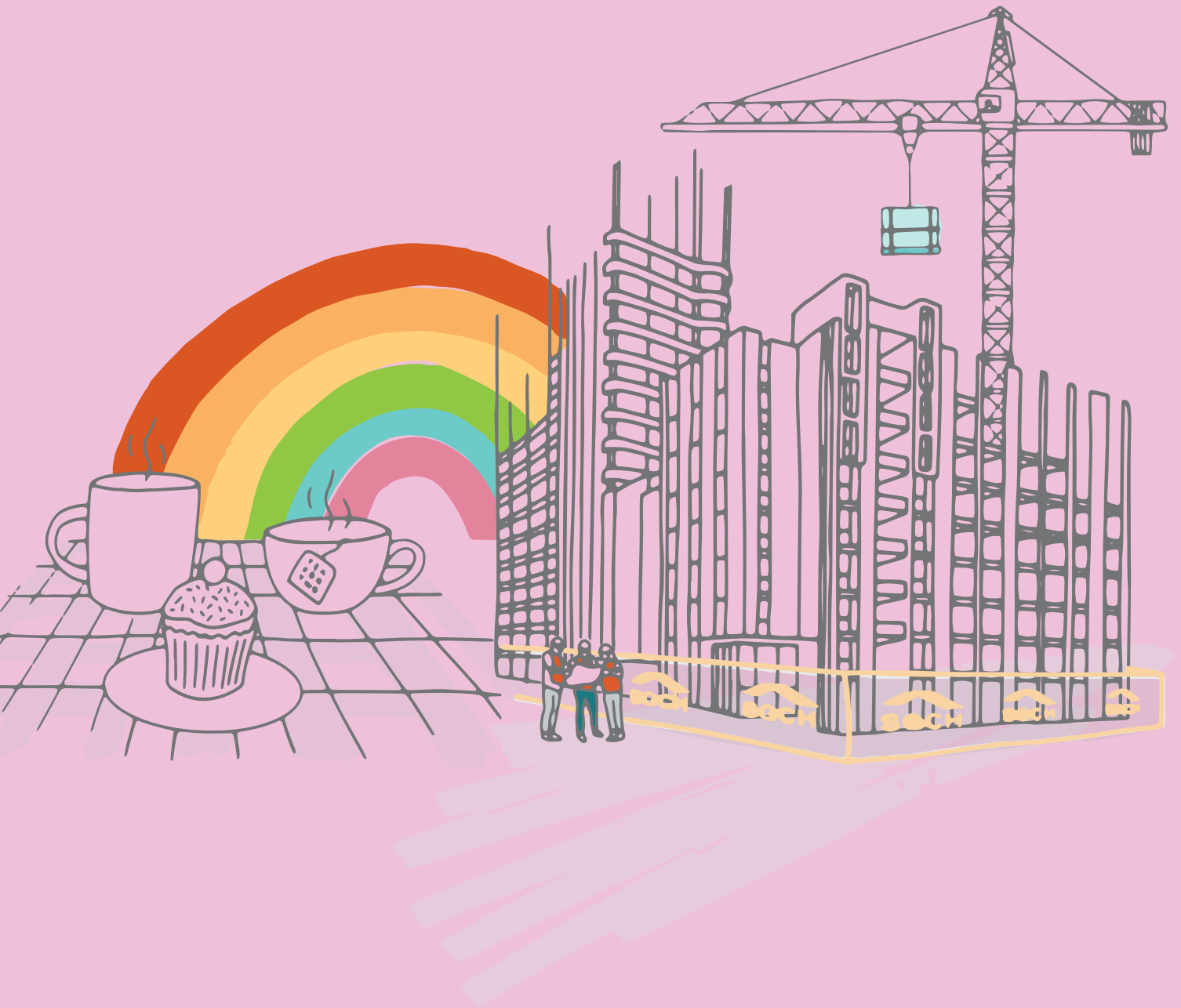


04 Consultation



This fourth Modern Slavery Statement is provided on behalf of the SGCH Group comprised of SGCH, the parent, and all wholly owned subsidiaries. The subsidiaries share the same non-executive directors, executive leadership team and employees as SGCH.

Each subsidiary adopts the same policies and processes and shares the same supply chain. This Modern Slavery Statement was created through collaboration between representatives of all business divisions.



05

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 by the Governing Body of SGCH on 30 August 2024.

Karen Orvad

Chair of the Board of Directors of SGCH

Responsible Member of SGCH's Principal Governing Body



St George
Community
Housing

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