



Modern Slavery Statement

Financial Year 2022 – 2023



Housing Australia

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Housing Australia

1. Introduction

Modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery involves serious exploitation of people and includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

We recognise that modern slavery can be linked to other crimes and activities that adversely impact human rights, including bribery, corruption and environmental damage. We have a responsibility to respect human rights in our operations and activities as part of our responsible business conduct.

Modern Slavery Statement

This modern slavery statement is made in respect of Housing Australia (ABN 22 498 714 570) for the financial year ended 30 June 2023 (FY 2022–2023). It has been prepared to comply with the reporting requirements under the *Modern Slavery Act 2018* (**Modern Slavery Act**).

Housing Australia is committed to continuously improving the way we identify and mitigate the risk of modern slavery occurring within our business operations, supply chain and customer relationships. This statement sets out our approach to modern slavery and how we identify and mitigate this risk.

Housing Australia's Audit and Risk Committee and Board have had the opportunity to consider and provide input into this statement.

Approval of principal governing body

This statement was approved by the Housing Australia Board in their capacity as the principal governing body of Housing Australia (as defined by the Modern Slavery Act) on 30 November 2023. It will be reviewed and updated annually.

Signature of responsible member

This statement was signed by the Chair of the Housing Australia Board, a responsible member of Housing Australia (as defined by the Modern Slavery Act), on 30 November 2023.



Carol Austin
Chair, Housing Australia Board



Housing Australia

2. About Housing Australia

Housing Australia (formerly named National Housing Finance and Investment Corporation (NHVIC)), was established by the Australian Government to improve housing outcomes by helping more Australians to access affordable, safe and secure housing.

The entity was renamed Housing Australia on 14 September 2023 following the passage of the Federal Government's Housing Legislative Package. While the renaming occurred after the FY 2022-2023 reporting period, this statement has been prepared using the new name Housing Australia and associated branding.

What we do

Housing Australia brings together all levels of government, institutional investors, lenders, community housing providers (**CHPs**), faith-based organisations, private sector developers and construction companies to facilitate and deliver more social and affordable housing. We also work with over thirty participating lenders to enable eligible home buyers to purchase a home with a very small deposit and without the need for Lenders Mortgage Insurance.

In FY 2022-2023, Housing Australia provided long-term and low-cost loans and capacity building assistance to registered CHPs to support the provision of more social and affordable housing. Housing Australia finance is funded primarily by the issue of social and sustainability bonds (via the Affordable Housing Bond Aggregator).

Through the National Housing Infrastructure Facility (**NHIF**), Housing Australia provided loans and grants to help finance critical infrastructure projects to unlock and accelerate new housing supply and to support new social and affordable housing projects.

Housing Australia also administered the Home Guarantee Scheme to support eligible home buyers to purchase a home sooner and undertook independent research into housing supply, demand and affordability in Australia.

In FY 2023-2024, Housing Australia's role has expanded to include primary responsibility for co-investment finance to support delivery of 40,000 social and affordable homes through the Housing Australia Future Fund (**HAFF**) and National Housing Accord.

In addition, we will continue to support initiatives that seek to increase the supply of social and affordable housing by providing low-cost, long-term loans to registered CHPs; facilitating investment in Australia's social and affordable housing sector; providing capacity building grants to upskill the community housing sector; delivering data-driven analytics into the housing sector; and assisting eligible home buyers to purchase a home.



Housing Australia

3. Our structure, operations and supply chains

Our structure

We are a corporate Commonwealth entity with an independent Board that is responsible for managing our affairs. This includes determining our strategy, defining our risk appetite and making financing decisions, and ensuring the proper, efficient and effective performance of Housing Australia’s functions. The Chief Executive Officer reports to the Board and is responsible for the daily administration of Housing Australia.

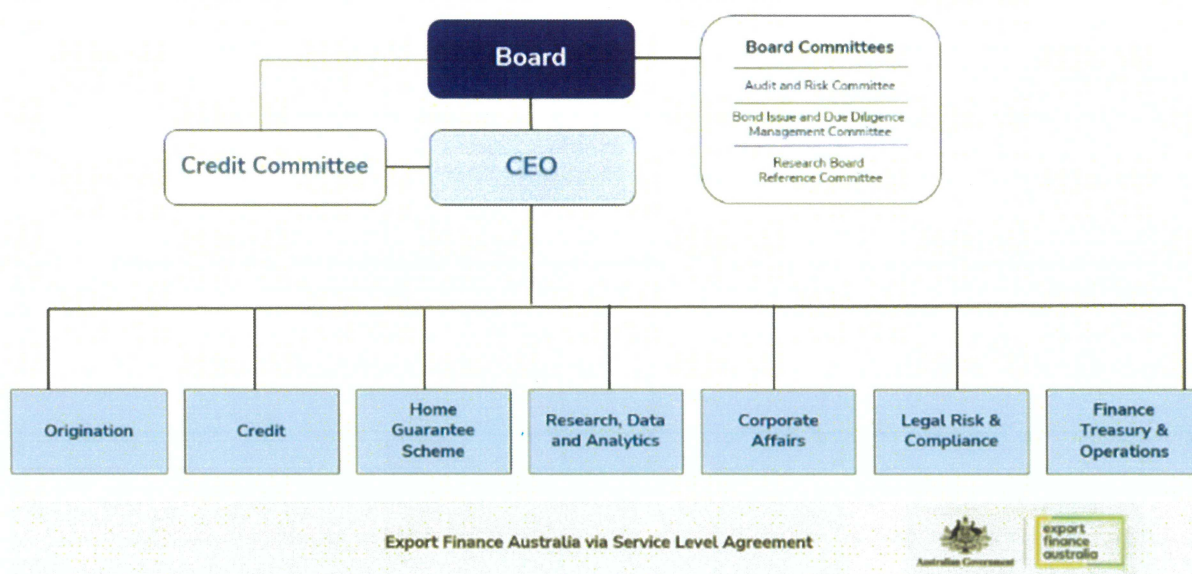
In performing its functions, Housing Australia is governed by the requirements and constraints of the *Housing Australia Act 2018 (Housing Australia Act)* and the *Housing Australia Direction 2018 (Investment Mandate)*. As a corporate Commonwealth entity, Housing Australia is also subject to the requirements of the *Public Governance, Performance and Accountability Act 2013 (PGPA Act)*.

Although we form part of the Department of Treasury portfolio of agencies, we do not form part of any corporate group, nor do we own or control any other entities. Our responsible Minister is the Minister for Housing, Minister for Homelessness and Minister for Small Business, the Hon Julie Collins MP (**Minister**).

Our legal corporation name under our legislation is Housing Australia..

A breakdown of our corporate governance structure, which is current as of 30 June 2023, is set out in *Figure 1* below.

Figure 1: Corporate governance structure





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Our remuneration strategy, structure and governance arrangements are detailed in our 2022–2023 Annual Report.

Our people

As at 30 June 2023, we had 78.7 full-time equivalent employees (FTEs) including 72.7 permanent FTEs and six short-term contract FTEs. Our workforce profile and employee breakdown based on equal employment opportunity designated groups are set out in *Figures 2A and 2B* below.

Figure 2A: Workforce profile

Classification	30 June 2023	30 June 2022
Permanent employees	72.7	47.8
Short-term contract employees	6	2.8
Total	78.7¹	50.6²

1. Two permanent employees were part-time in 2022–23.

2. One permanent and one fixed-term employee were part-time in 2022–23.

Figure 2B: Employee breakdown

Equal employment opportunities – designated group	30 June 2023		30 June 2022	
	Employees	%	Employees	%
Woman/Female	35	44	19	37
Man/Male	44	56	32	63
Non-binary, prefers not to answer, or uses a different term	0	0	0	0
Total	79	100	51	100
Non-English speaking background ¹	39	49	26	51
Aboriginal or Torres Strait Islander background	1	<1	1	2
People with disability	-	-	-	-

1. Non-English speaking background (or with parents who are from a non-English speaking background).

We operate in a regulated environment, including under the *Fair Work Act 2009*, and have policies and procedures around employment screening, employment conditions and appropriate workplace behaviour. Our employees are encouraged to reflect on our culture and values (see *Figure 3* below) when considering the spirit and letter of these policies and procedures. Housing Australia's values underpin our culture, the way we go about our work, how we interact with our stakeholders and how we deliver on our mission.



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Figure 3: Our values



Our location

Our registered office is located at Level 8 Export Finance House, 22 Pitt Street, Sydney NSW 2000.

The majority of Housing Australia's employees are based in Sydney, with a small number based in Canberra (serviced office space).

Our operations, supply chains and projects we support

We take a risk-based approach to modern slavery risk in our business operations, supply chain and customer relationships.

As we are an Australian-based entity and our primary operations are office-based, we consider the risk of modern slavery occurring directly within our business operations to be low. However, we recognise that our operations may indirectly support modern slavery occurring in our supply chain or via our customers and the transactions and projects we support.



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In accordance with the *United Nations Guiding Principles on Business and Human Rights*, we have prioritised our focus and actions on areas where we consider the potential impact of modern slavery to be the greatest and where we might have a greater opportunity to influence outcomes.

As such, at this stage our identification and assessment of modern slavery risk centres primarily on the financial transactions and projects we support, rather than on our Key Supplier Contracts¹ where certain procurement exposures still exist but to a lesser extent.

In making the statements above, we considered and contrasted the overall modern slavery risk profile of our customers and transactions with that of our supply chain.

We also considered our direct supply chain across two data sets: dollar value per category and percentage of total cost per category (see *Figure 4* below). Our Key Supplier Contracts are representative of the direct supply chain categories set out below.

Figure 4: Direct supply chain categories – by dollar value and percentage

Direct Supply Chain Category	FY 2022-23 Cost \$	% of Total Cost \$
Consultants	\$4,031,907	30%
Contractors	\$3,298,071	25%
Information and communication technology	\$2,157,965	16%
Services provided by Export Finance Australia	\$1,155,723	9%
Legal services	\$508,524	4%
Insurances	\$504,486	4%
Professional services	\$286,681	2%
Travel and incidentals	\$250,340	2%
Credit information	\$232,624	2%
Recruitment services	\$221,683	2%
Marketing and media	\$178,229	1%
Staff training and development	\$172,941	1%
External auditor services	\$85,000	1%
Other - office administration	\$346,344	3%
Total Cost	\$13,430,518	100%

¹ **Key Supplier Contract** means our third-party contracts with suppliers valued at \$100,000 or more (GST inclusive), which were still being performed during 2022–2023 or were entered into during 2022–2023. It does not include lease arrangements and Australian Commonwealth entity contracts.



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During FY 2022–2023, we continued to provide transparency on our Key Supplier Contracts by publishing key reporting details about them on our website in accordance with the Senate Order for Entity Contracts (or ‘Murray Motion’ listing). We update this listing every six months.

In FY 2022–2023 there were 27 Key Supplier Contracts still being performed or entered into. They are all Australian-based suppliers.

As a general observation, the nature of our Key Supplier Contracts tends to be more medium to long term engagements rather than many high turnover engagements. Approximately 81% of our Key Supplier Contracts were entered into in FY 2022–2023, with the remainder being ongoing contracts entered into in prior financial years.

In addition to our Key Supplier Contracts, we have other arrangements in place under which we receive services. In FY 2022–2023, these arrangements were relatively small in value compared to our Key Supplier Contracts. They were largely entered into with Australian-based suppliers, including Australian Commonwealth entities. For these reasons, we consider these arrangements generally as lower risk, therefore we have not included them in our Key Supplier Contract analysis.

The types of industries and nature of our FY 2022–2023 transaction exposures reflect our role as a provider of financing solutions to improve housing outcomes for Australians. They also reflect the assistance we provide to other government entities.

As noted above, we have identified our customer relationships and the transactions and projects we support as a continued priority for our focus and actions in the modern slavery space, together with the key risk areas identified in section 4.

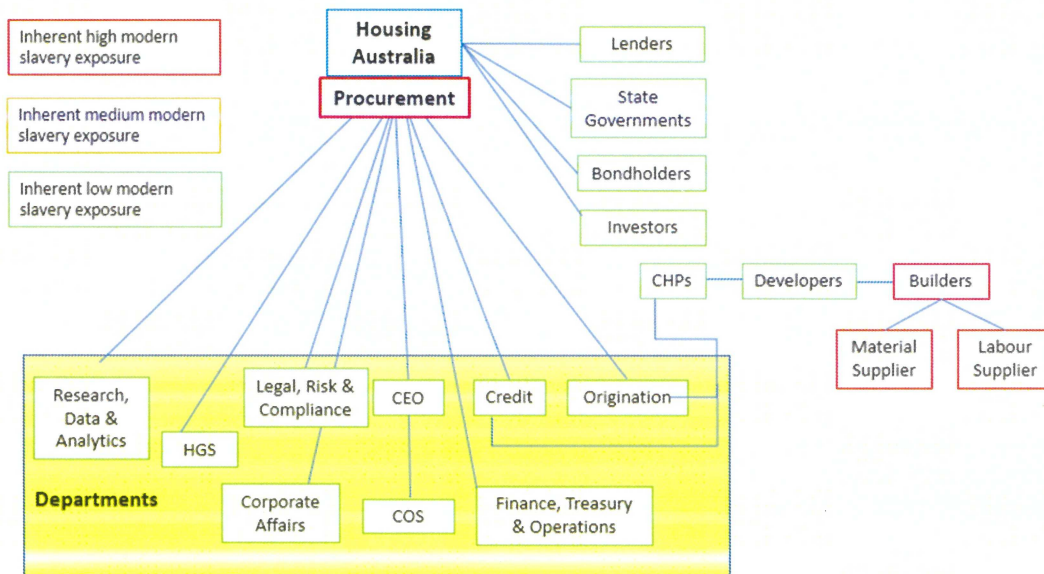


4. Our risks of modern slavery practices

Risk assessment

Housing Australia has a generally low exposure to direct business activities that may give rise to modern slavery risk. The diagram in *Figure 5* below provides a simplified view of Housing Australia’s inherent exposure to modern slavery. The inherent exposure is mitigated by operational and contractual controls.

Figure 5: Modern slavery exposures – Simplified stakeholder map



Key risk areas

The key risk areas which have the potential to expose Housing Australia to modern slavery practices are:

Construction

Housing Australia is increasingly engaged as a financier and grant provider in construction activities via its support of the CHP sector, as well as State, Territory and local government. These entities will engage a reputable developer to design an affordable housing project. The developer will subsequently engage a builder to deliver the project. The builder will engage material and labour suppliers to provide resources for the project.

There is a risk within the labour supply chain that contractors and/or subcontractors may be exposed to modern slavery practices, such as:



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- forced or unpaid work
- unsafe conditions
- bonded and child labour
- inadequate accommodation
- passport confiscation
- human trafficking

In addition to construction labour, sourcing raw materials from high-risk geographies often compounds the risk. Australian companies commonly source raw building materials from Asia, a region considered as high risk for modern slavery. Common product categories have been found to be produced by child and forced labour, including bricks, tiles, cement, granite, rubber and timber. The sourcing and use of manufactured products, such as HVAC and electrical products, introduces an additional layer of complexity and risk. The need for multiple components means there are cascading and inter-related supply chains implicated in the procurement of construction materials.

Housing Australia will manage any potential indirect risk of modern slavery via the construction supply chain by including appropriate anti-slavery provisions in its documentation generally for its loan and grant facilities. These provisions will require CHPs and their developers to represent that they do not engage in modern slavery practices.

Procurement

Housing Australia could also be exposed to modern slavery risk through its procurement process.

Housing Australia's procurement procedures require the procuring officer to consider and document any modern slavery exposures when making a procurement. Housing Australia does not make a significant amount of procurements and the majority are with reliable, Australian-based, commercial vendors for purchases that have a low modern slavery exposure.

Procurements for security, cleaning and maintenance, facilities management, office supplies, ICT goods/services, merchandising and travel are more exposed to the risk of modern slavery than procurements for professional services provided by major accounting and law firms, for example.

We note that Housing Australia has a service level agreement in place with another government agency, Export Finance Australia (EFA). Under that agreement, EFA supports Housing Australia with the provision of certain services such as security, cleaning and maintenance, and facilities management. We note that EFA has in place a number of policies, procedures and practices to identify, address and mitigate the risk of modern slavery occurring, as well as a program of continuous improvement (see EFA's FY 2021-22 Modern Slavery Statement).

Housing Australia manages the risk of modern slavery within the procurement process on a case-by-case assessment of the exposure. In particular, Housing Australia has identified its procurement of ICT goods/services as an area for focus in the coming year.



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Information and Communication Technology (ICT)

During 2022–2023 we engaged with 22 ICT suppliers for the goods and/or services listed in *Figure 6* below. There were six key suppliers which provided the majority of our ICT services over the period (being 75% of our ICT expenditure). The services for those six key suppliers were predominantly IT support, hardware maintenance, IT development, cyber security uplift implementation, and website redesign and maintenance. The goods were predominantly software licenses.

Figure 6: FY 2022-23 ICT Suppliers

Supplier *	Goods/Services	FY23 actual cost \$
Operations & Technology Group Pty Limited	Microsoft Azure/ Microsoft Online/ IT support	\$491,397.82
EFA (IT cost recharge)	Software license/ Hardware maintenance/ IT support	\$444,757.77
Accenture Australia Pty Ltd	CHP online application preparation	\$248,785.63
TheSOCO Pty Ltd	CRM/ Claims platform development	\$212,754.55
CyberCX Pty Ltd	Cyber security uplift/ Airlock implementation	\$143,812.50
Digital Garden Pty Ltd	Website redesign and maintenance	\$115,901.00
Supplier 7	IT hardware	\$69,668.73
Supplier 8	IT hardware	\$47,484.20
Supplier 9	Enterprise web security solution	\$45,601.20
Supplier 10	Board platform annual fee	\$40,689.77
Supplier 11	Software license service	\$39,002.99
Supplier 12	HR system implementation and annual fee	\$38,478.00
Supplier 13	IT hardware	\$37,128.30
Supplier 14	Subscription service	\$35,855.29
Supplier 15	Power Apps development	\$31,689.60
Supplier 16	Software license	\$28,981.10
Supplier 17	Software development	\$21,297.43
Supplier 18	e-mail security license renewal	\$21,103.70
Supplier 19	Website update	\$10,648.00
Supplier 20	Other license and equipment	\$27,891.46
Supplier 21	e-signature license	\$4,147.18
Supplier 22	Annual subscription	\$1,098.90
Total		\$2,158,175.12

* We have not reported the supplier name where consideration is less than A\$100,000 (GST inclusive) and disclosure would reveal commercially sensitive information and pricing, which accords with our reporting requirements under the Senate Order for Entity Contracts Listing.



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For the following period FY 2023–2024, it is forecasted that the same top six key suppliers will be used for similar goods and services, with a slight increase in expenditure.

We have no current modern slavery concerns with our ICT suppliers nor have any been raised independently. They are well established and reputable ICT suppliers and we have maintained a long-standing relationship with the majority of them.

Investment of liquid assets

Housing Australia's investment of liquid assets is currently restricted to investments in Australian Government Securities, Australian State and Territory Government securities, and certain APRA-regulated Australian Authorised Deposit-taking Institutions. Housing Australia has no offshore investments in liquid assets. Consequently, Housing Australia assesses the modern slavery risk in respect of its investment of liquid assets to be low.

Funding program

Housing Australia's social and sustainability bonds are purchased by over 60 institutional investors. These investors are subject to 'Know Your Customer' anti-money laundering screening via our joint lead managers. The majority of Housing Australia's investors are Australian domiciled fund managers, superannuation funds, insurers and banks. However, several international investors have also purchased Housing Australia bonds including fund managers, central banks and insurers.

Housing Australia's bonds are distributed via the five joint lead managers (**JLMs**) on our banking panel. These banks are Australia and New Zealand Banking Corporation, Commonwealth Bank of Australia, Deutsche Bank, UBS and Westpac Banking Corporation. Housing Australia pays fees to these banks at the time of bond issuance. Since inception, Housing Australia has paid approximately \$4.2 million to the JLMs.

Housing Australia also engages external advisors in connection with its funding program. These advisors include legal and assurance services from major professional services firms.

Consequently, Housing Australia assesses the modern slavery risk in respect of its funding program to be low.



5. Addressing our risks of modern slavery practices

Our governance framework

We have policies, procedures and practices that help us identify, address and mitigate the risk of modern slavery occurring within our business operations, supply chain and customer relationships (including the transactions and projects we support). These are outlined in *Figure 7* below.

The Housing Australia Board regularly reviews and approves our policies to ensure the ongoing effectiveness of our governance framework.

Figure 7: Policies and Procedures

Policy / Procedure	Description
Staff Code of Conduct	Our Staff Code of Conduct outlines the obligations and responsibilities of our employees, including in relation to standards of personal behaviour.
Anti-Corruption Policy	This policy sets out the key obligations of our employees in deterring and preventing bribery and corruption.
Procurement Policy	This policy sets out how we procure goods/services and manage relationships with third parties across the supply lifecycle, including in accordance with the core principles of the Commonwealth Procurement Rules, as applicable.
Procurement Risk Assessment	<p>This is a risk assessment tool for new supplier engagements and includes questions that allow us to assess risks with a new supplier, including any human rights or modern slavery issues potentially involved with its supply of goods/services to us.</p> <p>This assessment involves a two-step inherent risk and residual risk assessment (the latter based on 'risk domains', which may be triggered depending on the engagement).</p> <p>The risk domains include physical security, anti-bribery and corruption, work health and safety, environmental and sustainability, human rights, and subcontractor risks. A risk rating is allocated to each engagement to inform procurement decisions, allowing us to adopt a risk-based approach.</p>
Contracts Register	We have a centralised register of all third-party contracts.
Standard form supply contracts	We use our standard form supply agreements where appropriate. These agreements include certain modern slavery representations from suppliers, which apply during the term of the contract.
Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) Program and Transaction Risk Assessment	<p>We have in place an AML/CTF Program.</p> <p>As part of the program, we use our Transaction Risk Assessment tool to assess the risk of our transactions. It encompasses:</p>



	<ul style="list-style-type: none"> • Anti-money laundering and counter-terrorism financing due diligence on our customers as applicable. ‘Know Your Customer’ checks are completed, with certain information collected and verified; • A broader risk assessment of the transaction is completed, including in relation to bribery, corruption, sanctions and adverse media on our customers and other key parties involved in the transaction, as applicable. <p>In some circumstances, enhanced due diligence will be required.</p>
Incident Reporting Policy	This policy establishes an internal reporting process for employees to report incidents that are not public interest disclosures, and it provides a framework for the investigation and resolution of these incidents.
Work Health and Safety	We have a policy and associated procedures in place to ensure the health and safety of our employees are considered and managed.
Public Interest Disclosure (“Whistleblower”) Policy	This policy and associated procedures provide mechanisms for ‘public officials’ (as defined under the <i>Public Interest Disclosure Act 2013</i> (Cth)) to report conduct engaged in by an agency, public official or contracted service provider in connection with a Commonwealth contract that involves alleged wrongdoing or illegal or improper conduct.
Complaints Policy	This policy provides an avenue for our customers, suppliers, third parties or any member of the public to lodge a complaint with us. It also sets out how a complaint can be referred to the Commonwealth Ombudsman by a complainant.
Internal audit program	We have an agreement with a professional services provider for internal audit services, under which relevant audits and reviews are completed against an ARC-endorsed and Board-approved audit plan.
Compliance training	We have a mandatory ongoing compliance training program that our employees must complete annually, which incorporates training modules in accordance with our Compliance Plan for the relevant year. In 2022–2023, this included an anti-money laundering and counter-terrorism financing module and anti-bribery and corruption module. In 2023-2024, it will also include a specific module on modern slavery risk.
Law enforcement and regulator relationships	We share information with AUSTRAC, the Australian Federal Police and other relevant agencies and regulators in accordance with applicable laws and our policies and procedures, including where we suspect criminal activity has occurred or may occur.



6. Assessing the effectiveness of our actions

We are continuously seeking to improve our policies, procedures and actions in relation to modern slavery. The measures that we have monitored for 2022–2023 include:

Focus Area	Measure	% or No.
Human rights training	% of permanent FTE employees completing the following training:	
	• whistleblower awareness	new starters
	• fraud awareness	95%
	• anti-bribery and corruption	new starters
	• First Nations cultural awareness – Reconciliation Week	100%
Supply chain transparency	% of contracts entered into with a value of \$100,000 (incl. GST) or more - details published on our website.	100%
Reports – modern slavery	No. of public interest disclosure (whistleblower) reports received about modern slavery.	0
Reports – other environmental, social and corruption	No. of public interest disclosure (whistleblower) reports received about other environmental, social and corruption matters.	0
Incidents raised – modern slavery	No. of incidents raised under our Incident Reporting Policy in relation to potential transaction supply chains.	0
Complaints – modern slavery	No. of public complaints received about modern slavery.	0
Complaints – other environmental, social and corruption	No. of public complaints received about other environmental, social and corruption matters.	0

Continuous Improvement – FY 2022-2023

In addition to the policies and measures outlined above, we took the following actions in 2022–2023 to further identify, mitigate and combat modern slavery risk:

Focus Area	Measure FY 2021-2022	Action Taken
Our Supply Chain		
Modern Slavery Policy	Introduce a Modern Slavery Policy (or consider including relevant sections in our existing	A Modern Slavery Policy has been drafted and will be



Focus Area	Measure FY 2021-2022	Action Taken
	Anti-Corruption Policy) to ensure our risk-based approach remains up to date, reasonable and proportionate.	approved by the Board in FY 2023-2024.
Procurement Risk Assessment	Continue to assess new suppliers through our Procurement Risk Assessment process and monitor the effectiveness of this process.	Ongoing
Supplier Code of Conduct	Introduce a Supplier Code of Conduct as a statement of values that we expect our suppliers to comply with, to help guide them in their responsibilities to combat modern slavery, which will be referenced in our standard supply agreements and published on Housing Australia's website.	A Supplier Code of Conduct has been drafted and referenced in our standard supply agreements and published on Housing Australia's website.
Supply contracts	<ul style="list-style-type: none"> Assess % of contracts which include modern slavery clauses. Negotiate inclusion of relevant modern slavery clauses in third party contracts, as appropriate. 	<ul style="list-style-type: none"> We assessed our Key Supplier Contracts of which approximately 40% included modern slavery clauses, noting that engagements with sole suppliers are less likely to include exploitation or modern slavery clauses. Ongoing
Our Transactions		
Transaction Risk Assessment	Evaluate any enhancements required to our Transaction Risk Assessment.	<p>The Transaction Risk Assessment form includes enhanced definitions for:</p> <ul style="list-style-type: none"> medium / high risk jurisdictions moderately high / very high risk business activities <p>noting there is an indirect risk of modern slavery due to our</p>



Focus Area	Measure FY 2021-2022	Action Taken
		transactions being connected with the construction industry.
Other		
Training	We will provide new modern slavery training to supplement current training on anti-money laundering and counter-terrorism financing and anti-bribery and corruption.	Training has been developed and was delivered in early FY 2023-2024 to provide general awareness on modern slavery, including awareness of our policy and this statement.
Complaints Mechanism	<ul style="list-style-type: none"> Review and update our Complaints Mechanism with the overarching aim of ensuring it is accessible to all our stakeholders, including members of the public who have an interest in our affairs and transactions. Communicate to employees any updates to the policy and our complaint handling procedures and practices. Consider whether our website feedback channel remains easy to access and utilise, understanding that feedback has the potential to help us grow as an organisation. 	<ul style="list-style-type: none"> Review and update of the Complaints Mechanism (now called the Complaints Policy) has been completed. Training will be completed in FY 2023-2024. An online complaints form has been drafted to supplement the current email channel.

Continuous Improvement – FY 2023-2024

We plan to introduce the following actions in 2023–2024 to further identify, mitigate and combat modern slavery risk:

Focus Area	Measure
Our Supply Chain	
Modern Slavery Risk Assessment	Request CHPs and other funding recipients to undertake modern slavery risk assessments as part of scoping the project prior to financial support being provided by Housing Australia.



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Focus Area	Measure
	We have had discussions with the Community Housing Industry Association (CHIA) which suggest that this should not impose an undue burden on CHPs, particularly as modern slavery is an issue that needs to be addressed under the environmental, social and governance (ESG) standards recently adopted in the sector. CHIA will be providing CHPs with best practice guidance to meet these new ESG standards.



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Appendix 1 - Mandatory reporting criteria

This statement complies with the mandatory reporting criteria of the Modern Slavery Act. The following table references the content in this statement which complies with those criteria:

Mandatory Criterion	Page Reference
Identify the reporting entity	4
Describe the reporting entity's structure, operations and supply chains	5
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	10
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	14
Describe how the reporting entity assesses the effectiveness of these actions	16
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Do not own or control any entities
Any other relevant information	Not applicable