



# Voluntary Modern Slavery Statement

## About Bridge Housing Limited

Bridge Housing Limited (**Bridge Housing**) is not required by The Modern Slavery Act 2018 (Cth) (**Act**) to report on the risks of modern slavery in its operations and supply chains. As a socially responsible and people-focused organisation which takes pride in its ethical, values-based operations, Bridge Housing has chosen to report voluntarily.

Bridge Housing is a community housing provider delivering long-term accommodation and housing services for people on low to moderate incomes through our property portfolio across metropolitan Sydney.

Our services include end to end property and tenancy management, development and construction, a for-purpose real estate agency as well as community development and tenant participation services.

## Structure, operations, and supply chains

Bridge Housing's operational entity is a registered tier one New South Wales community housing provider.

Name	ACN	Charity	Community Housing Provider
Bridge Housing Limited	135 570 955	Yes	Yes

Bridge Housing also has a number of subsidiaries which have been formed for the purpose of attracting investment, including through the Housing Australia Future Fund. These subsidiaries, which are not currently operational, are listed below. Some subsidiaries may become active in the next reporting period. When operational, the subsidiaries will enter into service agreements with Bridge Housing to out-source operations, staffing, property and asset management to Bridge

Housing, meaning that the supply chain for goods and services will be consistent across the group.

<b>Name</b>	<b>ACN</b>	<b>Charity</b>	<b>Community Housing Provider</b>
Bridge Living Limited	628 122 038	Yes	Yes
Bridge Communities Limited	673 784 846	Yes, as trustee of Bridge Communities Trust	No
Bridge Neighbourhoods Limited	675 577 821	Future registration sought	Future registration sought
Bridge Places Sydney Limited	675 577 849	Future registration sought	Future registration sought
Bridge Homes Sydney Limited	675 577 812	Future registration sought	Future registration sought
Bridge Doorways Limited	675 577 787	Future registration sought	Registration not sought at current time

## Risks in Bridge Housing's operations and supply chains

We have considered Bridge Housing's supply chain and the types of goods and services it purchases and identified the following material risks of modern slavery within its operations and supply chain:

**Supply chain risk:** Construction materials required for development, repairs and maintenance work are generally sourced indirectly by a supplier for Bridge Housing. Construction materials supplied from geographical areas outside Australia have a higher risk of including modern slavery in the supply chain. Complex global supply chains are more difficult to monitor. As development and acquisition of new property increases across the group, this increases in significance as a risk.

Other items sourced by us from time to time may have a greater risk due to modern slavery practices within a particular industry, for example IT hardware.

**Worker exploitation:** Casual workers, construction workers and cleaners are often from migrant, low socio-economic or culturally or linguistically diverse backgrounds and are more vulnerable to modern slavery risks. This includes a higher risk of undocumented workers and poor conditions, including the risk of industrial accidents. Complex employment relationships present heightened risks of exploitative practices and are harder to monitor.

## Our commitment

### **We are committed to:**

- Taking a learning and development-based approach to better identify the modern slavery risks in our business and supply chains;
- Taking an integrity based, ethical approach to risks we identify and creating clear, measurable actions, which we will report on and update annually;
- Building our own capacity and raising awareness within our own business and with our external suppliers.

**Our property maintenance:** We are committed to implementing industry leading rates of tenant satisfaction underpinned by well-maintained homes. We undertake

a comprehensive assessment of each property standard every three years.

Our primary supplier for maintenance services, Assett Group Services (AGS), was appointed following a transparent procurement process. AGS has clear KPI management including ethical employment standards embedded in the contract and innovative requirements to deliver social outcomes. AGS has a contractual requirement to comply with Bridge Housing's Code of Conduct to guide the delivery of repairs and maintenance services in an ethical and transparent manner.

**Our construction and development:**

Bridge Housing undertakes construction and development to provide more homes for people in need. We partner with reputable builders and sub-contractors to deliver projects within a strong contractual framework. Our selected partners must abide by our requirements in key areas including:

- Ethical sourcing and procurement;
- Code of conduct for suppliers;
- Compliance with our anti-fraud and corruption policy; and
- Compliance with all laws relating to wages, benefits and transparent record keeping, working hours and conditions of employment.

We target direct suppliers to reduce complexity in our supply chain.

When procuring new developments, we ensure that the supply chain is mapped so that we understand the risks involved.

**Our people:**

We believe in our strong and inclusive organisation, backed by engaged and skilled people.

We strive to be an engaged, safe and culturally appropriate employer for people of diverse backgrounds.

We treat people with dignity and respect by:

- Employing our staff directly and avoiding complex labour relationships in our direct team;
- Locating all direct supply of labour in Australia so we can rely on the legal and political framework of regulation to prohibit forced labour and protect workers' rights, including worker health and safety;
- Exceeding our legislative obligations to be an employer of choice;
- Preventing our contractors from subcontracting without our consent;
- Ensuring we have contractual rights to audit our contractors' compliance with their legal requirements;
- Ensuring our workers are given access to our policies, including our Code of Conduct and our Whistleblowing policy; and
- A diversity, equity and inclusion strategy and internal staff committee to guide implementation.

**Our ESG focus and culture:**

The development and implementation of the ESG Framework is a key strategic priority for Bridge Housing as a way of focusing our effort on delivering positive social, environmental and governance outcomes. We take a learning and development approach to building our capacity to manage ESG risks through all aspects of our operations and prioritise actions to address those risks with the greatest material impact on the business. This is evidenced by:

- An ESG Framework with clear reporting targets establishing an environmental baseline for our business with clear reporting lines to the Board;
- Impact-based reporting;
- Strategic leadership by our independent skills-based board which conducts regular external board reviews to ensure

governance best practice, including cyclical review of internal policies;

- A robust internal audit program to maintain external independent oversight of key risk areas;
- Employment of two defined roles monitoring compliance within the organisation;
- Clear corporate policies as well as a Board and organisational training program to support our governance;
- Consistently meeting and exceeding regulatory benchmarks as evidenced through our annual compliance returns under the National Regulatory Scheme for Community Housing; and
- The Difference We Make, our outcomes evaluation methodology, which guides the measurement of resident and community outcomes of our service delivery.

## Our effectiveness

### How effective were our actions in 2023-2024?

Our sector experienced an influx of growth opportunities in 2023-2024, largely related to the Housing Australia Future Fund, at the same time as our business experienced organisational change at Board, CEO and executive level, as well as changes to our organisational group structure. As a group, we revisited our priorities to ensure we continued to align with our strategic direction.

In the last year, we:

- Developed a supplier modern slavery and ESG checklist and issued it to our largest suppliers, but deferred a full roll out of this checklist for future years;
- Updated our procurement policy and the related delegations;
- Created an organisational structure to ensure the parent would retain control of the supply chain as we grow;
- Delivered ESG outcomes including impact reporting;
- Embedded ESG into our board reporting; and

- Continued to deliver excellent results as an employer of choice, including by updating our leave and well-being policies.

## Our future commitments

Our focus in 2024-2025 is to:

- Develop our procurement and due diligence processes to ensure we are capturing data about our supply chain;
- Further investigate our supply chain, updating our supplier checklist following feedback and expanding this as risks arise in Bridge Housing's development supply chain, as that aspect of the organisation grows in complexity;
- Take lessons learned from our supplier review into our annual risk management review and identify areas of improvement;
- Build engagement and collaborate with direct suppliers to deliver improvement; and
- Educate workers about the risk of modern slavery and the steps taken to address it at Bridge Housing.

## Statement

Bridge Housing makes this Statement in accordance with section 13 of the Act. Bridge Housing's Board of Directors is its principal governing body for the purpose of the Act. This voluntary Modern Slavery Statement was considered and approved by the Board of Bridge Housing Limited on 26 June 2024 for adoption on 1 July 2024 and will next be reviewed in June 2025.



Stephen Bull

Executive Chair

## Related documents

### Legislation

- *Modern Slavery Act 2018 (Cth)*

### Documents supporting this policy

- *Procurement Policy*
- *Contractor Code of Conduct*
- *WHS Framework (including policies and procedures)*
- *ESG Framework*
- *Bridge Housing Values*
- *Statement of Business Ethics*
- *Equal Opportunity, Discrimination, Harassment and Bullying Prevention*
- *Conflict of interest policy*
- *Director & Officer conflict of interest policy*
- *Fraud Control Policy*
- *Whistleblower Policy*