

PURPOSE

The Evolve Housing Group is opposed to all forms of Modern Slavery. This policy outlines the approach the Evolve Housing Group will take to:

1. detect, prevent and respond to the risk of Modern Slavery;
2. demonstrate its commitment to following processes and practices to manage Modern Slavery risk in its business;
3. promote awareness of concerns surrounding Modern Slavery to its Employees, Directors, Contractors and Suppliers; and
4. comply with its legislative obligations under the Acts.

POLICY NUMBER	GRC054
POLICY OWNER	Group General Manager Growth, Governance, Legal & CoSec
APPROVED BY	Evolve Housing Ltd Board of Directors
APPROVAL DATE	October 2023
REVIEW DATE	October 2025

1. INTRODUCTION

The Evolve Housing Group acts ethically, which is critical to realising its vision, mission, values and strategic objectives.

This Modern Slavery Policy (the **Policy**) has been developed to ensure Modern Slavery is not occurring in the Evolve Housing Group business or its supply chains.

2. SCOPE

The Policy applies to Employees, Contractors and Directors of the Evolve Housing Group. The Policy should be read in conjunction with other relevant policies of the Evolve Housing Group.

3. DEFINITIONS

Acts means the Modern Slavery Act 2018 (Cth) and Modern Slavery Act 2018 (NSW) and regulations and guidelines made under those Acts.

Contractor(s) means people contracted to provide services within the business to the Evolve Housing Group.

Directors means a director of the Evolve Housing Group.

Employee(s) means any person who is employed by, engaged on a contract basis or volunteers for the Evolve Housing Group, and includes cadets, interns and persons undertaking work experience.

Evolve Housing Group means Evolve Housing Limited ACN 127 713 731 and its controlled entities as listed in clause 10 of this policy.

GET means the Group Executive Team for the Evolve Housing Group.

Manager means any Employee of the Evolve Housing Group employed in a manager role.

Material Supplier means the Supplier noted in a Material Supplier Contract.

Material Supplier Contract means a Supplier Contract that:

1. has a total contract value exceeding \$50,000 (AUD) plus GST for any one contract;
2. has a cumulative contract value/ spend in any financial year exceeding \$200,000 (AUD) plus GST; or
3. is for the supply of goods or services that have a high risk of Modern Slavery, in the reasonable opinion of a member of the GET.

Modern Slavery has the meaning given to the term in the Acts.

Supplier(s) means any person or organisation who provides goods or services to the Evolve Housing Group.

Supplier Questionnaire means the due diligence questionnaire issued by the Evolve Housing Group to a Supplier before engagement, seeking information on a Supplier's business practices including their supply chains and third party/ customer relations.

Supplier Contract means any agreement, contract, licence, lease or other arrangement between a Supplier and an Evolve Housing Group entity.

4. GUIDING PRINCIPLES

This Policy is designed to comply with the legal obligations of the Evolve Housing Group. If anything in this Policy is inconsistent with any law, that legal obligation will prevail over this Policy.

5. MANAGEMENT OF MODERN SLAVERY RISK

A. Contract management

Material Supplier Contracts coming into existence after the date of this Policy will require Suppliers to:

- I. not engage, and take all reasonable steps to ensure that its personnel, agents and subcontractors, do not engage in any activity that is Modern Slavery or would constitute an offence under the Acts;
- II. promptly disclose the existence of Modern Slavery practices in their business or supply chains as soon as it becomes aware ; and
- III. in consultation with Evolve Housing, develop and implement an appropriate response if there is any Modern Slavery in its operations or supply chains, taking into account this

Policy and any Evolve Housing Group processes on how to respond to an actual or suspected case of Modern Slavery.

The Material Supplier Contract must contain a right of termination for the Evolve Housing Group if there is non-compliance by the supplier with any of the above.

All Material Supplier Contracts to be entered into by an Evolve Housing Group entity must first be provided to Governance and Legal, for review prior to execution, so that the above contractual provisions can be included. Any Supplier Contracts created by Governance and Legal will include the above contractual provisions. Exceptions to this requirement can only be agreed by the Group General Manager, Governance and Legal.

B. Monitoring of Suppliers – “know your supplier”

Due diligence will be undertaken on Suppliers to assess the risk of modern slavery practices existing within the Supplier’s business or supply chains.

- I. *New Suppliers:* Prior to entering into a contract with the Evolve Housing Group, Suppliers will be asked to complete a Supplier Questionnaire to enable the assessment of the risk profile of the Supplier. The Supplier Questionnaire is issued to the Supplier by Finance and the results are reviewed by Finance. This will be implemented within 24 months of the Approval Date.
- II. *Existing Suppliers:* Existing Suppliers will be asked to complete a Supplier Questionnaire to enable the assessment of the risk profile of the Supplier within the first 30 months of the Policy Approval Date.

A Supplier may provide to Evolve Housing Group, a copy of its current Annual Modern Slavery Statement. It is at Evolve Housing Group’s discretion whether to accept the Supplier’s Annual Modern Slavery Statement in satisfaction of the requirement to provide a Supplier Questionnaire.

- III. *Material Suppliers:* In addition to the Supplier Questionnaire, on an annual basis, Finance will conduct independent due diligence checks (through Dow Jones or similar) of Material Suppliers to verify the integrity of the Evolve Housing Group’s supply chain and business partners by assessing risks, such as bribery, corruption, dealings with sanctioned parties, adverse media coverage etc.

Any areas of concern will be raised by Finance with Governance and Legal for further advice.

Evolve Housing Group will participate openly and transparently in any questionnaire issued by a Supplier or other contracting party to the Evolve Housing Group.

C. Increasing awareness of modern slavery risk in the business

The Evolve Housing Group will develop and implement training for Employees to assist with the detection of Modern Slavery practices in the Evolve Housing Group’s business and its Suppliers’ businesses. This will include information on the types of conduct that is Modern Slavery, how to

identify incidents that present a risk of Modern Slavery and how Employees can contribute to the protection of human rights.

D. Recruitment Practices

The Evolve Housing Group will maintain leading practices to enable detection of Modern Slavery risk when engaging consultants and agencies in the recruitment of workers, consultants, interns and others. This will involve making detailed enquiries with consultants and agencies as to their policies and systems to ensure any such workers are aware of their rights and are paid in accordance with legislation and applicable Awards.

E. Annual Attestation

Each GET member will be asked to provide an annual attestation to the Group Chief Executive Officer, to the compliance by their respective division with this Policy (to the best of their knowledge and belief).

F. Periodic Audit

Governance and Legal will undertake periodic audits of Evolve Housing Group's compliance with the requirements of this Policy. All assistance will be provided to Governance and Legal to enable any such audit to take place.

G. Detection of Modern Slavery Risk in the Evolve Housing Group business or Suppliers

If Modern Slavery risk is suspected or detected in the Evolve Housing Group or a Supplier, it is to be referred to a member of the GET at the earliest possible stage. Alternatively, a report may be made under Evolve Housing's Whistleblower Policy, which applies to certain disclosures.

The GET will investigate and make a decision as to the next steps, for implementation by the Evolve Housing Group. In the case of suspected Modern Slavery in a Supplier, this may involve requesting the Supplier provide additional information, an undertaking and/or termination of the use of the Supplier.

6. RESPONSIBILITIES

A. Governance and Legal

The Governance and Legal division is responsible for:

- I. Implementing the Policy.
- II. Developing the content for the Employee training related to the Policy.
- III. Implementation of anti-Modern Slavery clauses in Supplier Contracts.
- IV. Undertaking the periodic audit of compliance by the Evolve Housing Group with the Policy.
- V. Providing legal advice to the business on suspected or actual cases of Modern Slavery or questions regarding the applicability of the Policy.

The Governance and Legal team will be responsible for preparing the annual Modern Slavery Statement (when the Evolve Housing Group becomes a reporting entity under the Act), with assistance to be provided by all areas of the business.

B. People and Culture

People and Culture is responsible for:

- I. Addressing Modern Slavery risks in the recruitment process, particularly when dealing with consultants and agencies in the recruitment of workers.
- II. enabling the Employee training on Modern Slavery in the online training platform and monitoring its completion by Employees.
- III. Investigating suspected breaches of this Policy by Employees, which may result in disciplinary action and/or dismissal for misconduct.

C. Corporate Services (Finance)

Corporate Services is responsible for conducting due diligence checks on new and existing Suppliers as outlined in this Policy. This includes the issuing of Supplier Questionnaires, the review, logging, tracking and management of due diligence checks and annual independent due diligence checks of Material Suppliers.

D. GET

The GET is responsible for Policy compliance including:

- I. Overseeing all sourcing activity, ensuring that an assessment of Suppliers is conducted in accordance with this Policy and Material Supplier Contracts are referred to Governance and Legal.
- II. Provide an annual attestation to the Group Chief Executive Officer of compliance with this Policy.
supporting Employees who raise genuine concerns in good faith under this policy.

E. Employees and Managers

- I. Manager's must ensure that Employees read, understand, and comply with this Policy.
- II. All Employees are responsible for ensuring the prevention, detection and reporting of Modern Slavery within the business and within Supplier organisations.
- III. All Employees and Managers must ensure that any Material Supplier Contract is provided to Governance and Legal for review, prior to execution.
- IV. All Employees are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- V. Employees must report any breaches or suspected breaches of this Policy by notifying their Manager, the GET or through Evolve Housing's Whistleblower Policy.
- VI. Employees are encouraged to raise concerns about any suspicion of Modern Slavery within the business or with its Suppliers.

7. MONITORING AND ASSURANCE

This Policy will be made available electronically, and on request for those that do not have electronic access.

To ensure adequate monitoring and assurance of the Policy, the Policy Owner will monitor and review this Policy every two years, unless an alternative timeframe is required by law, under contract or a risk assessment or system improvement requires an earlier review date.

8. POLICY BREACH

A breach of this Policy by an Employee, Contractor or Director may result in disciplinary action and/or dismissal/contract termination for misconduct.

9. VERSION CONTROL

The Policy, Governance and Compliance Officer will ensure that following a review of the Policy, version numbers are updated and obsolete versions are archived.

10. APPLICABILITY

This policy applies to :

Company
Evolve Housing Limited
EchoRealty NSW & ACT Limited
EchoRealty Vic Limited
Evolve Arncliffe Limited
Evolve Blacktown Limited
Evolve Penrith Limited
Evolve Melrose Park Limited
Evolve Merrylands Limited
Evolve Granville Limited
Evolve Edgecliff Limited
Evolve Carinya Limited
Evolve Housing Vic Limited
Evolve Playford Limited
Evolve Rosanna Limited
Evolve Sunshine Limited

11. RELATED DOCUMENTS

- Whistleblowing Policy
- Fraud Policy
- Code of Conduct
- Procurement Policy
- Equal Employment Opportunity Policy

- Recruitment Policy
- <https://www.acnc.gov.au/for-charities/manage-your-charity/governance-hub/acnc-external-conduct-standards>

12. REVISIONS

The following revisions have been made to this Policy:

Date Reviewed	Policy Reviewer	Key Changes
24/10/2023	Melissa Scardino (GM GAL	Policy adopted
15/09/2025	Andrea Jeffrey (Commercial & Contracts Legal Manager)	Updated having regard to implementation of the Management Initiatives at section 5.