

Voluntary Modern Slavery Statement

1. Purpose & Scope

The purpose of this statement is to:

- ensure that the goods and services purchased through Unison’s supply chains and also in connection with our property development and social and capital works projects are ethical and minimise or eradicate modern slavery risks.
- set out the responsibilities of Unison, its staff, suppliers, business partners and development partners in observing and upholding Unison’s position on modern slavery.

This statement applies to all:

- Unison staff (including those of Unison Property Corporation), contractors and volunteers engaged and undertaking work on behalf of Unison.
- Unison operations, activities and all dealings with third parties whether they be with public sector entities, private organisations, individuals or any representatives of such parties.
- Suppliers, business partners and development partners when supplying goods and services, working on projects or otherwise engaging with Unison.

2. Key responsibilities

Executive:

- Management is responsible for establishing a culture of zero tolerance towards modern slavery and human trafficking within the organisation.
- Ensure that appropriate policies, procedures, and training programs are in place to identify, prevent, and address instances of modern slavery.
- Provide leadership and resources to support the implementation of this Statement and promote transparency and accountability throughout the organisation.
- Incorporate contractual provisions and supplier codes of conduct that prohibit modern slavery and require suppliers to uphold ethical labour practices.
- work collaboratively with suppliers to address any instances of modern slavery identified within the supply chain and support remediation efforts.
- Conduct due diligence on suppliers and business partners to assess their compliance with anti-slavery and human trafficking laws and standards.

Employees:

- Familiarising themselves with this Statement and understanding their role in preventing modern slavery within the organisation and its supply chains.
- Report any concerns or suspicions of modern slavery to Unison management promptly.

Suppliers: Report any concerns or suspicions of modern slavery to Unison management promptly.

3. Statement

3.1 Background

Although slavery and servitude have been against the law across the world for many decades, contemporary forms of slavery and servitude still happen every day. Slavery is when someone exercises ownership rights over another person, as if the person were a piece of property. Someone in servitude may be directed where to live, may have freedoms curtailed, and may be unable to leave.

Modern slavery can occur in many forms such as forced labour, child labour, debt bondage, domestic servitude, sex trafficking, workplace abuse and human trafficking. We do not tolerate any forms of modern slavery and human rights violations in our organisation and supply chains.

Forced labour is when someone is compelled to do work – there may be a physical or mental constraint in this type of work, and it may involve the threat of punishment if the person does not perform the work.

The [2022 Global Estimates of Modern Slavery](#) revealed that 15,000 people in Australia are enslaved.

Section 11 of the [Charter of Human Rights and Responsibilities Act 2006](#) states that Victorians must not be held in slavery or servitude and they cannot be made to perform forced or compulsory labour. The Charter applies to agencies delivering services on behalf of the government.

3.2 Unison's approach

Unison upholds the highest standards of corporate governance. Our Board and Executive Team play an essential role in providing guidance and leadership to ensure alignment with organisational values and objectives.

Unison's vision to create 'Communities That Thrive' and our core values of People, Respect, Positivity and Accountability are at the heart of what we do.

Unison is proud to support the eradication of all forms of modern slavery under the Modern Slavery Act 2018.

We respect the dignity of persons and recognise each person's rights to freedom, justice and fair work conditions. Unison believes that all workers deserve to be treated with dignity and respect. We are committed to operating responsibly and establishing and adhering to the highest ethical standards. Unison is committed to ensuring that any form of Modern Slavery does not take place in its business or supply chain.

Unison has a zero-tolerance approach towards modern slavery and human trafficking in all its forms. We do not knowingly engage in or support any activities that involve modern slavery, forced labour, or human trafficking.

Although Unison is exempt from reporting under the Modern Slavery Act 2018, we endeavour to ensure that we comply with modern slavery legislation within our operations and supply chains, aiming to ensure that:

- employment is freely chosen.
- child labour is not used.
- a living wage is paid to all individuals.
- individuals are not required to work excessive hours.
- any actions taken in response to any instances of modern slavery are in the best interests of the suspected victim or victims.

We are committed to continuously improving our policies, procedures, and practices to prevent modern slavery. We regularly review and update this Statement to ensure its effectiveness and alignment with Australian legislative requirements.

3.3 Recruitment

Unison is an engaged, safe and culturally appropriate employer for people of diverse backgrounds.

We treat people with dignity and respect by:

- Avoiding complex labour relationships.
- 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 staff are given access to our policies, including the Unison Code of Conduct and Whistleblowing Policy & Procedure.

3.4 Procurement

As a socially responsible and person-centred organisation Unison commits to working with our suppliers, contractors, business partners and development partners to implement this statement and raise awareness of the risks of modern slavery

We maintain and improve our policies and procedures to identify risks and avoid complicity in modern slavery or human rights violations relating to our operations, our supply chain and service delivery.

Knowledge of the geographical distribution of our suppliers/contractors enables us to assess and mitigate any potential risks to human rights and modern slavery, while continuing to improve our ethical and responsible sourcing practices throughout our supply chain.

Unison 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
- *Supplier Code of Conduct*
- *Procurement Policy*
- 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.

3.5 Risks

Unison takes a risk-based approach to modern slavery.

3.5.1 Supply chain risk

Construction materials required for development, repairs and maintenance work are generally sourced indirectly by a contractor for Unison.

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. Development and acquisition of new property increases our risk.

Other items sourced by Unison may have a greater risk due to modern slavery practices within a particular industry, for example IT hardware, tools and consumables.

Effective supplier monitoring is crucial for determining our exposure to risk. Unison reviews our supply chain risk monitoring capabilities, where relevant, to determine that exposure.

3.5.2 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.

3.6 Reporting modern slavery

Employees are encouraged to report any breaches or issues relating to modern slavery in accordance with the Unison Code of Conduct.

Staff who have concerns that conduct by a supplier, business partner or development partner may constitute modern slavery, or a breach of laws related to modern slavery or prohibited business practices, must contact the Deputy CEO or Director People immediately.

Unison can report suspected cases of modern slavery to one of the following organisations. **In an emergency, or if a child is concerned, dial 000** to get emergency assistance.

- [Australian Federal Police – Human trafficking and slavery](#)
- Attorney General's Modern Slavery Business Engagement Unit:
slavery.consultations@ag.gov.au
- [Anti-Slavery Australia - What to do if you suspect slavery](#)
- [Australian Anti-Slavery Commissioner – Report suspected modern slavery](#)

3.7 Our future commitments

Unison will:

FY 2025/26:

- Revise our Procurement Policy and Contractor Code of Conduct to set out expected supplier responsibilities in relation to modern slavery.
- Strengthening our understanding and capabilities related to how we manage modern slavery, including education and awareness training and working with our suppliers to gain better insights into our supply chains.
- Provide a copy of this Voluntary Modern Slavery Statement to key suppliers/contractors.
- Invite key suppliers/contractors to complete a modern slavery self-assessment survey to confirm what actions they are taking to prevent slavery in their own organisations and supply chains.
- Build engagement and collaborate with direct suppliers to deliver improvement.
- Educate employees about the risks of modern slavery and the steps taken to address it at Unison.

FY 2026/27:

- Map our supply chain and the types of goods and services we purchase to assess potential risks of modern slavery.
- Further develop our procurement and due diligence processes to ensure we are capturing data about our supply chain.
- Add lessons learned from our supplier/contractor survey to our risk management reviews and identify areas of improvement.
- Monitor and assess our effectiveness.

4. Definitions

Modern slavery: is defined in accordance with the definitions provided in the *Modern Slavery Act 2018 (Cth)*, including:

- slavery (the condition of a victim over whom any or all of the powers attaching to the right of ownership are exercised, including where such a condition results from a debt or contract made by the victim)
- servitude (the condition of a victim who provides labour or services including sexual services and because of the use of coercion, threat or deception, they are not free to stop working or leave their place of work and are significantly deprived of personal freedom)
- forced labour (the condition of a victim who provides labour or services and because of the use of coercion, threat or deception, they are not free to stop working or leave their place of work)
- deceptive recruiting (the condition of a victim being deceived about whether they will be exploited through a form of modern slavery)
- forced marriage (where coercion, threats or deception are used or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony which causes the victim to marry without their free or full consent)
- debt bondage (the condition of a victim's services being pledged as security for a debt, the debt is manifestly excessive, the reasonable value of the victim's services are not used to liquidate the debt, or the length and nature of the victim's services are not limited and defined)
- trafficking in persons (the recruitment, transportation, transfer, harbouring or receipt of persons, by means of coercion, threat or deception, for exploitation through modern slavery)
- the worst forms of child labour including:
 - where children are exploited through slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage, serfdom and forced or compulsory labour
 - the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances
 - the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs
 - children are engaged in work which is likely to harm their "health, safety or morals"
 - offences relating to use of children for production of child abuse material and to the production, dissemination or possession of child abuse material.

5. Document owner

The CEO is responsible for the review of this document. Refer to them to suggest any revision.

6. Related Information

6.1 Internal documents and links

- *Contractor Code of Conduct*
- *Procurement Policy*
- *Unison Code of Conduct*
- *Unison Values*
- *Whistleblower Policy & Procedure*

6.2 External documents and links

- [2022 Global Estimates of Modern Slavery](#)
- [Charter of Human Rights and Responsibilities Act 2006](#): Section 11
- [Modern Slavery Act 2018](#)
- Norton Rose Fulbright – [Modern Slavery Act: What Businesses in Australia Need To Know](#)
- [Australian Federal Police – Human trafficking and slavery](#)
- Attorney General's Modern Slavery Business Engagement Unit:
slavery.consultations@ag.gov.au
- [Anti-Slavery Australia - What to do if you suspect slavery](#)
- [Australian Anti-Slavery Commissioner – Report suspected modern slavery](#)

7. Statement

Unison makes this Statement in accordance with section 13 of the Act. Unison'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 Unison Housing Limited on 16/10/2025.



James King
CEO