



# MODERN SLAVERY STATEMENT

December 2020

Reimagine Urban Life





# FOREWORD<sup>1</sup>

**40 MILLION**  
PEOPLE TRAPPED IN SLAVERY

APPROXIMATELY

**25 MILLION**  
IN FORCED LABOUR



**18%**  
CONSTRUCTION



**22%**  
MANUFACTURING,  
FORESTRY, MINING  
AND QUARRYING

**Modern slavery is a significant global issue, and one of the worst forms of human rights violations. Globally, it's estimated that there are over 40 million people trapped in slavery, and approximately 25 million in forced labour.**

An estimated 18 per cent of those in forced labour work in the construction industry, and another 22 per cent within manufacturing, forestry, mining and quarrying, all of which supply raw materials and components for construction. Australia's construction industry is also considered higher risk because of the complexity of its supply chains and links to the Asia Pacific region, which is reported to have 66 per cent of the world's forced labour.

We recognise that we have a responsibility to affect change through the choices we make in our supply chain and procurement practices. By establishing good governance, systems, processes and capability to identify and manage modern slavery in our supply chain, as well as working collaboratively across property and other industries to share knowledge, we are helping to shine a light on this form of abuse.

Our approach is iterative and risk-based, with an overarching aim to create positive, sustainable change. We collaborate with other leading Australian businesses, as well as within our own industry, to align our work with best practice and ensure that what we learn contributes to the broader goal of eliminating slavery.

We are committed to help take slavery from the shadows. Our contribution is to implement mechanisms which ask the right questions to scan for and diagnose risk, develop appropriate responses and work constructively with our suppliers. To progress this approach, we undertook a traceability study into our cleaning supply chain in FY20 - a key risk area for Mirvac - which you can read about on page 9.

We are also committed to working transparently with our peers and sharing what we learn widely, and we are pleased to share this statement with you.

*Susan Lloyd-Hurwitz*

Regards,

**Susan Lloyd-Hurwitz**  
CEO & Managing Director

*This statement has been approved by the Mirvac Board on 14 December 2020.*



## OUR 2020 HIGHLIGHTS

> **STARTED IMPLEMENTING OUR TWO-YEAR, BOARD-APPROVED STRATEGY TO ADDRESS MODERN SLAVERY AND HUMAN RIGHTS RISKS IN OUR SUPPLY CHAIN**



ESTABLISHED  
**MIRVAC'S  
ANTI-SLAVERY  
COMMITTEE**



COMMENCED OUR  
FIRST TRACEABILITY  
STUDY INTO A KEY  
RISK AREA:  
**CLEANING**



COMMENCED  
**AN INTERNAL  
EDUCATION  
PROGRAM**

> **SHARED OUR EXPECTATIONS WITH OUR SUPPLY CHAIN BY UPDATING OUR VENDOR CODE OF CONDUCT AND STANDARD CONTRACT TERMS**

> **ACTIVELY PARTICIPATED IN MULTI-SECTOR KNOWLEDGE SHARING, INCLUDING THROUGH THE UN GLOBAL COMPACT NETWORK OF AUSTRALIA**

### ABOUT THIS REPORT

This is a joint statement to cover Mirvac Limited (ABN: 92 003 280 699) which includes Mirvac Property Trust and other entities over which Mirvac Limited has control for accounting purposes during year ending 30 June 2020 (FY20) (together for the report, references to 'Mircac', 'Group', 'we', 'us' and 'our' refer to Mirvac Limited and its controlled entities as a whole). This Modern Slavery Statement has been published in accordance with the Modern Slavery Act 2018 (Cth) (Act). This is Mirvac's FY20 Modern Slavery Statement and references in this report to a 'year' relate to the financial year ended 30 June 2020.



# OUR OPERATIONS AND ACTIVITIES

Mirvac is an integrated urban property group listed on the Australian Securities Exchange, with an integrated development and asset management capability.

We own and manage assets across office, retail, industrial and build-to-rent in our investment portfolio, and currently have over \$24 billion of assets under management.

We also have an \$8.2 billion committed and future commercial development pipeline, and \$15.6 billion in residential development, allowing us to deliver innovative and high-quality property for our customers, while driving long-term value for our stapled securityholders. For over 48 years we've been creating sustainable, connected and vibrant urban environments for people to work, shop, live and play.

We have a workforce of approximately 1,400 employees and operate primarily in Australia's four key cities of Sydney, Melbourne, Brisbane and Perth.



## Our Supply Chain

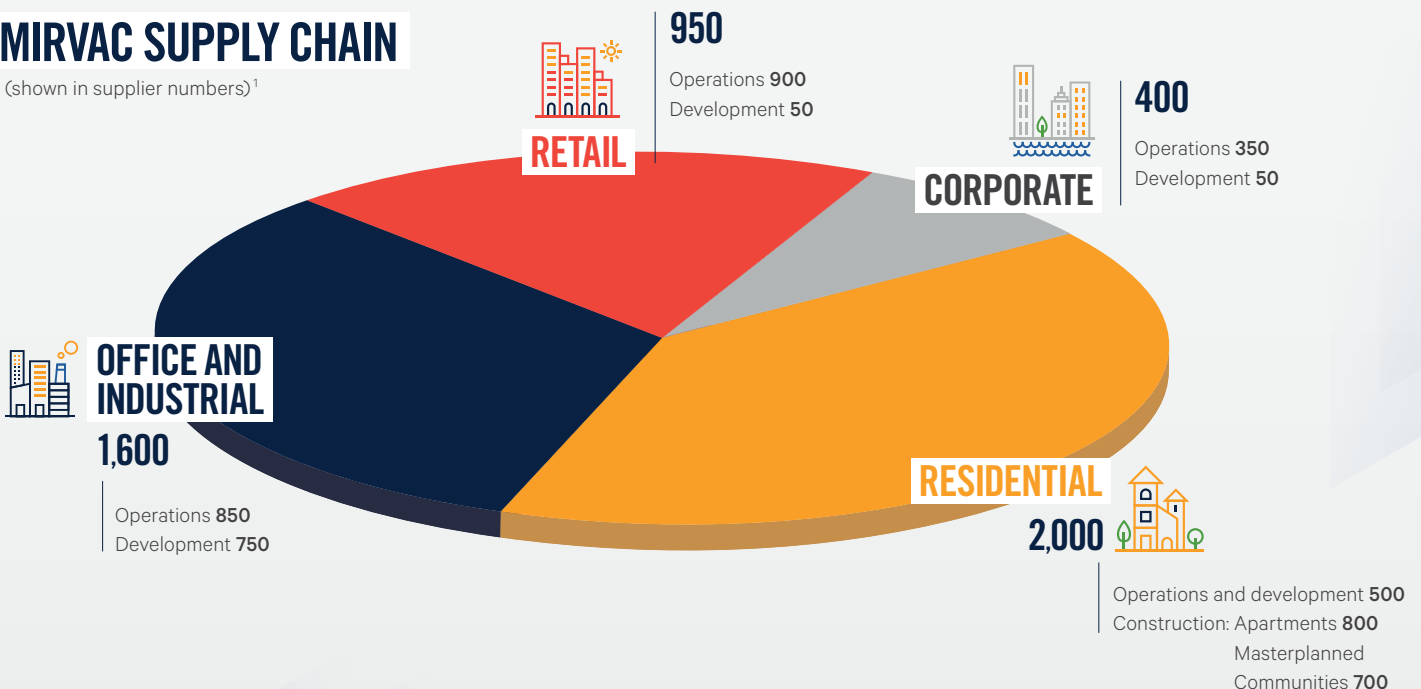
In FY20, Mirvac spent \$1.6 billion with over 4,000 unique suppliers across corporate, operations and development. This included:

- > **Corporate** – 400 suppliers provided services, such as professional services, information technology and communications, human resources, marketing, office suppliers, travel and insurance.
- > **Office & Industrial** – 1,600 suppliers across building maintenance, mechanical operations, security, plumbing, electrical works, fire safety and cleaning services, as well as temporary personnel services. Suppliers also provided services across civil works and infrastructure, floor finishes, joinery and carpentry, form work, structural steel, concrete, metal work, equipment hire, scaffolding and landscaping.
- > **Retail** – 950 suppliers including asset management services such as: cleaning, parking management, and security, along with those who help us deliver our upgrades and maintenance works.
- > **Residential** – over 2,000 suppliers used to deliver 1,600 apartments and 120 masterplanned communities homes in FY20. This included 700 suppliers in the operational and sales and marketing teams.

In FY20, 99 per cent of Mirvac's procurement spend (by value) was with Australian entities. We recognise that these suppliers may procure materials from outside of Australia, and as such, we completed further assessments of our supply chain as described in the Risk Assessment section of this statement.

## MIRVAC SUPPLY CHAIN

(shown in supplier numbers)<sup>1</sup>



1. Note that some suppliers are used across multiple sectors.

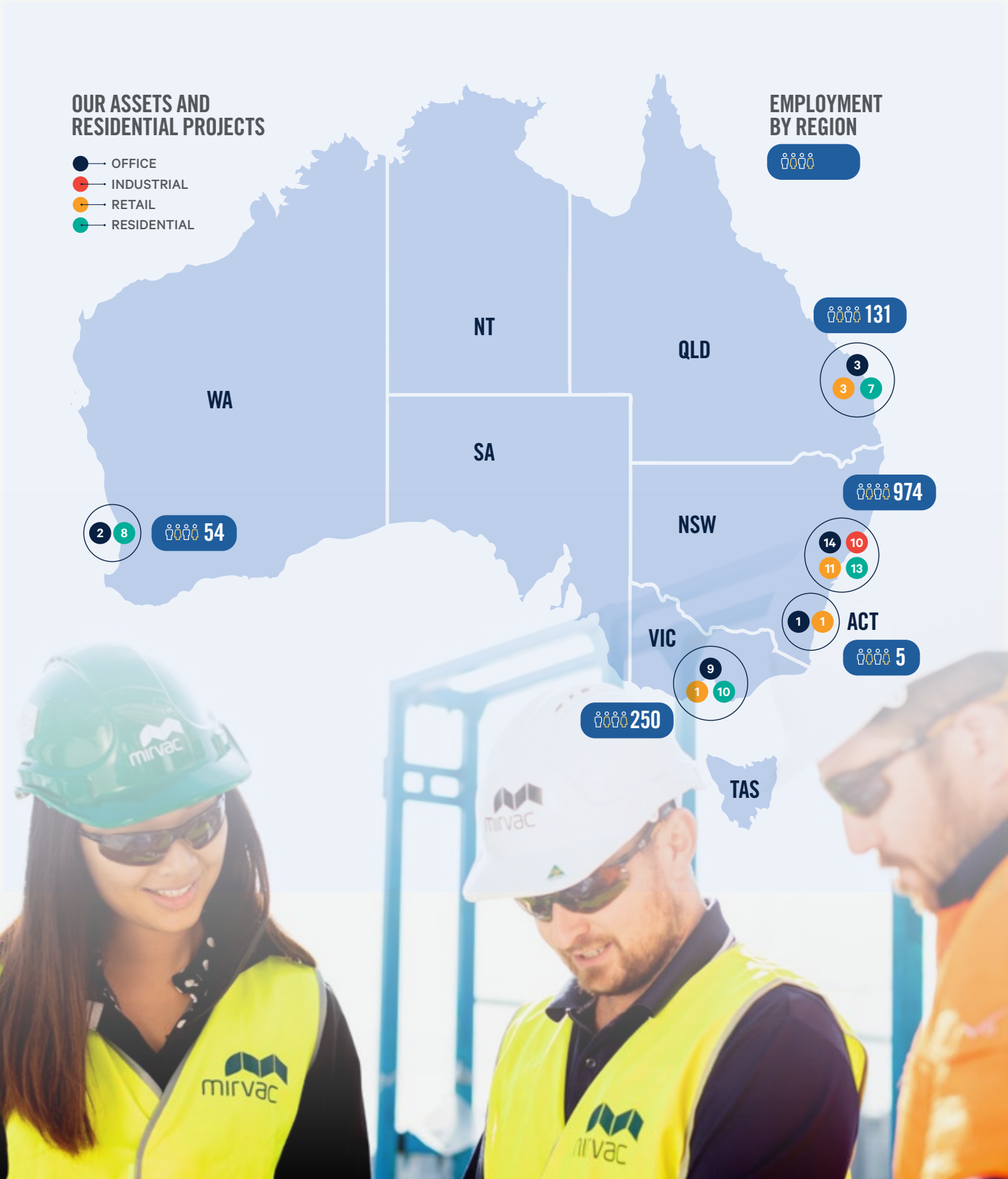


# OUR OPERATIONS AND ACTIVITIES (CONTINUED)

Mirvac is committed to respecting and promoting the human rights of our employees, customers, suppliers and business partners, consistent with the International Bill of Rights (which includes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights) and the United Nations Guiding Principles on Business and Human Rights.

We are a signatory of the UN Global Compact, and we participate actively in the Australian network. We are mindful of the UN Sustainable Development Goals (SDGs) and we report our progress on the SDGs relevant to Mirvac's sustainability strategy, *This Changes Everything*, through our integrated annual reporting. Our sustainability reporting is prepared in accordance with the Global Reporting Initiative (GRI) G4 Core Sustainability Reporting Guidelines.

We recognise modern slavery as conduct involving the use of any form of slavery and situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Modern slavery can include human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, and the worst forms of child labour.







# RISK ASSESSMENT (CONTINUED)

In addition, we developed a risk matrix through which we can assess our suppliers by materials, location and known risk areas, helping us to identify the appropriate responses to these risks. This risk matrix is an enhancement to our current risk mitigation measures and will be deployed in stages in FY21 with a focus on high value, high risk contracts.

The risk management assessment incorporates a two-step due diligence process to guide our teams on the base-level assurance measures we expect from our suppliers.

## Modern Slavery supply chain due diligence

(This risk methodology is based on risk to human life and people's welfare)

### STEP 1: RISK RATING

Identify the level of risk by selecting:

1. the type of entity
2. where operations occur
3. the vendor type

|                           | Australia entity with overseas operations / supply chain |           |      |                |           |      | Non-Australian entity |           |      |  |
|---------------------------|--|-----------|------|----------------|-----------|------|-----------------------|-----------|------|--|
|                           | Country Rating   |           |      | Country Rating |           |      | Country Rating        |           |      |  |
|                           | Low  | Mid-range | High | Low            | Mid-range | High | Low                   | Mid-range | High |  |
| Labour hire               | 3  | 4         | 6    | 6              | 2         | 5    | 6                     |           |      |  |
| Contractor / Manufacturer | 3  | 3         | 4    | 6              | 2         | 5    | 6                     |           |      |  |
| Consultant                | 1  | 3         | 4    | 6              | 2         | 2    | 6                     |           |      |  |
| Supplier                  | 1  | 1         | 2    | 6              | 1         | 5    | 6                     |           |      |  |

#### Country rating examples

| Australian entity  | Country rating  | Low  | Mid-range  | High   |
|--|---|--|--|--|
| Australian entity is where the contracting entity is with an ABN / ACN | Country rating based on the Walkfree analysis 2018 overall (normalised, weighted) vulnerability score <sup>1</sup> and prevalence of modern slavery (high to low) | United States<br>France<br>Japan<br>Singapore<br>United Kingdom<br>Germany<br>Canada<br>Norway<br>Sweden<br>Austria<br>New Zealand | China<br>Vietnam<br>Malaysia<br>Italy<br>Slovakia<br>Hong Kong<br>Taiwan<br>Czech Republic | South Sudan<br>Afghanistan<br>Syria<br>Congo<br>Somalia<br>Sudan<br>Yemen<br>Iraq<br>Pakistan<br>Nigeria<br>Korea<br>Papua New Guinea<br>India<br>Russian Federation<br>Turkey<br>Bangladesh |

1. <https://www.globallslaveryindex.org/2018/methodology/vulnerability/>

**Step 1:** an assurance level is derived by inputting the type of service provided and the geographical location<sup>2</sup> (see below). Assurance levels range from 1-6, with 6 representing the highest risk.

**Step 2:** from this, the corresponding actions required to be completed by the supplier are outlined. For example, a high-risk supplier would need to undertake a Mirvac risk assessment, in addition to having a contract. The assurance actions are matched to Mirvac's existing legal and governance procedures, and utilise the Property Council of Australia (PCA)'s self-assessment questionnaire and the Supply Chain Sustainability School for education resources.

The process identified areas which are categorised as highest risk for Mirvac, which includes labour hire and cleaning. As a result we undertook a detailed traceability study into cleaning in our supply chain, which you can read about on page 9.

### STEP 2: ASSURANCE ACTIONS

Complete the following Action(s), based on the Risk Rating number

| Risk Rating | Contract | Vendor assurance | Vendor self-assessment | Vendor training | Independent audit | Escalate to Anti-Slavery Committee (ASC) |
|-------------|----------|------------------|------------------------|-----------------|-------------------|--|
| 1           | ✓        |                  |                        |                 |                   |  |
| 2           | ✓        | ✓                |                        |                 |                   |  |
| 3           | ✓        | ✓                | ✓                      |                 |                   |  |
| 4           | ✓        | ✓                | ✓                      | ✓               |                   |  |
| 5           | ✓        |                  |                        |                 | ✓                 |  |
| 6           | ✓        |                  |                        |                 |                   | ✓  |

We are working in partnership with our supply chain and taking a constructive and supportive approach to understanding risks and requirements, working wherever possible to be pragmatic about what we expect from them so that we can work together where we find risk.

We are part of a knowledge sharing partnership coordinated by the PCA, which features 14 Australian property companies (see page 13). This partnership has contributed funds and capability to develop a risk assessment questionnaire and all partners are committed to full transparency about their progress.



## ASSESSING OUR HIGH-RISK OFFSHORE MANUFACTURERS

In FY20 we conducted independent audits on all our direct offshore manufacturers with a risk rating of 5 or more (based on our risk matrix).

The manufacturers we assessed provided joinery on an apartment project in Sydney and steel to office developments in Sydney and Melbourne.

As per our risk matrix requirements, these manufacturers completed a third-party audit during the tender process. The audit covered the following and included personnel interviews:

|                             |                        |                    |
|-----------------------------|------------------------|--------------------|
| child labour                | disciplinary practices | safety             |
| forced or compulsory labour | labour contract        | health and hygiene |
| association                 | working time           | environment        |
| discrimination              | wages and benefits     |                    |

We also reviewed parts of their supply chains, which resulted in a further 10 audits being completed across six provinces in China, as well as in Thailand. Following the independent audits, all suppliers progressed to selection based on their positive audit results.







CASE STUDY

# OUR TRACEABILITY STUDY INTO CLEANING IN OUR SUPPLY CHAIN

As a sector, cleaning is considered to be a high-risk area for modern slavery and exploitation because of the complexity of the industry, the nature of the workforce, and the often-opaque nature of operations.

On any given day across Mirvac’s office and retail businesses, our suppliers have approximately 450 cleaners at 63 locations, and to better understand the risks of modern slavery to our business, we undertook a traceability study into our cleaning operations.

**Purpose**

The purpose of this study was to focus on one high-risk area, and work with our suppliers to conduct an extensive risk exploration. Our objective was to document the process, have it peer-reviewed, and use it as an opportunity to learn about how best to satisfy ourselves that we have conducted effective due diligence in the highest risk categories, so that we can systematically apply a similar process to other risk areas.

**Process**

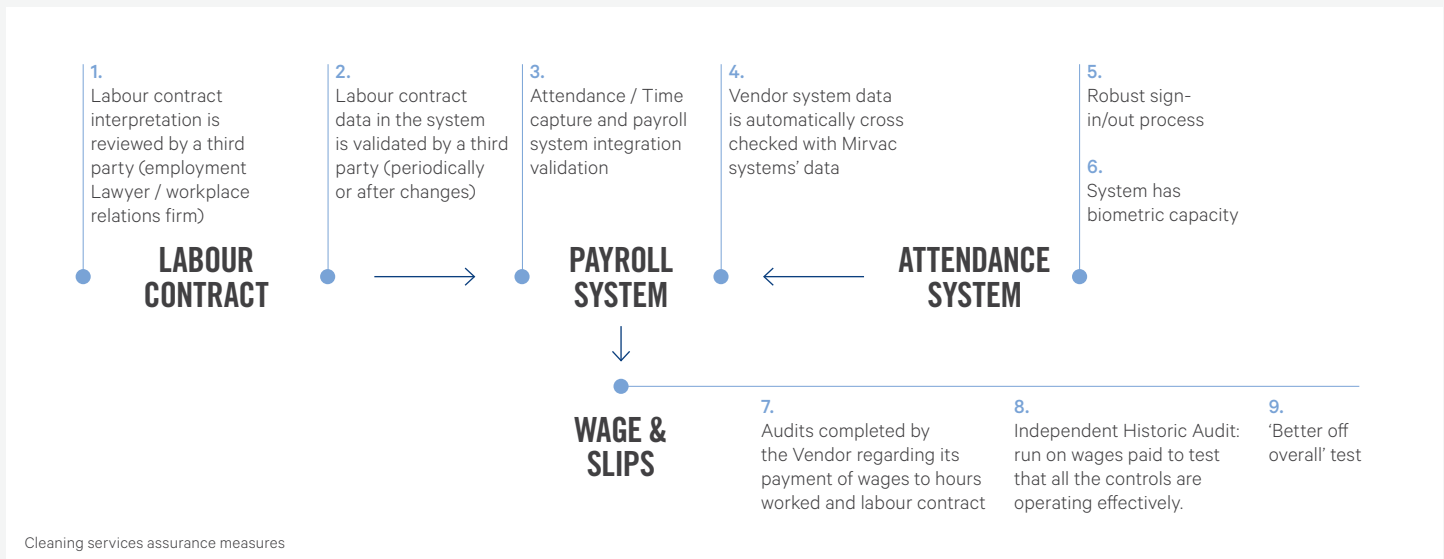
Three service providers were chosen based on their scope and size, including a supplier that has been certified by the Cleaning Accountability Framework (CAF). As part of the process, the vendors were asked to undertake:

1. the PCA’s modern slavery self-assessment questionnaire (with a focus on recruitment and subcontracting practices);
2. a third-party audit of their statutory compliance;
3. an assurance review of their systems, as per the below diagram; and
4. a face-to-face interview between one of the business leaders and Mirvac’s responsible sourcing leader to explore their understanding of modern slavery.

This process was independently peer-reviewed by a responsible sourcing specialist with over 20 years of experience across multiple industries.

The review unveiled strengths in our process, including the identification of a high-risk supply chain through industry, the use of the industry checklist followed by a Mirvac-specific risk assessment, as well as our choice to engage an independent auditor to undertake the financial and statutory audit.

However, a gap in our process was highlighted: due to COVID-19, we had not continued the process to undertake interviews directly with cleaning personnel, which would have provided us with a better-informed assessment of risk in the supply chain. It’s a lesson we will apply to any future traceability studies. Following up on the identified non-conformances to develop and oversee a detailed remediation plan and timeline was also recommended.



## OUR TRACEABILITY STUDY INTO CLEANING IN OUR SUPPLY CHAIN (CONTINUED)

### What we found:

1. All three suppliers undertook the PCA self-assessment questionnaire, which showed they were aware of the Modern Slavery Act and had a mechanism to provide employees with an opportunity for their voice to be heard; however, they were yet to have a clear way to provide or manage remediation.
2. Feedback from the auditors highlighted a few areas that required further investigation and remediation. This included instances where our suppliers' timesheets did not match employee payslips or where part-time rates (according to the award) were not processed correctly, which meant that annual leave and superannuation payment amendments needed to be made.
3. The purpose of the systems assurance review was to provide assurance that our suppliers are paying their workers correctly. What we found was that by ensuring the relevant systems (such as payroll and time capture) were integrated correctly, and by using biometric attendance systems, suppliers would minimise the need for retrospective audits, decrease the risk of wage payment issues and provide assurance to property owners of who is working at each location.
4. The face-to-face interviews helped us to determine each supplier's understanding of modern slavery risk. This provided excellent insight into how aware our supply chain currently is about their obligations and how effective Mirvac's communications with them around this topic have been so far. This set of insights has led us to develop plans to collaborate further with our suppliers and industry to reduce modern slavery further down supply chains.

Undertaking a deep dive into this high-risk category has shown us that selecting our cleaning supply chain to assess was a good opportunity to both identify non-conformances and begin to establish a practice around responding to these risks.

The deep dive also gave us an insight into other factors that may reduce the likelihood of modern slavery occurring, such as the existence of employee welfare programs, robust employee communication platforms, and effective systems in place (such as biometric time capture).

### Application of learning

Following this study, Mirvac created a set of labour contracting guidelines that provide checklists and procedures for employees. These guidelines provide assistance to our employees to:

- > assess the risk of a vendor;
- > communicate to our vendors our expectations on modern slavery risk mitigation; and
- > help suppliers to be aware and identify the possibility of modern slavery occurring in their contracting networks, and advise on what to do if they discover the problem.

As a result of the peer review, we are also considering how we can:

- > establish a documented process to support the audit program that clearly outlines what the expectations on non-conformance close out, agreement of time-specific action plans, remediation and timeframes are;
- > add these audit requirements to our Vendor Code of Conduct; and
- > establish a regular audit program for all high-risk suppliers based on an established and widely recognised audit protocol, such as SMETA<sup>3</sup> or BSCI<sup>4</sup>.

In time, we will also consider how we can:

- > improve our processes around identifying high-risk Tier 2 supply chains and requiring Tier 1 suppliers to demonstrate how these risks are being identified and managed;
- > separate the oversight and governance of these requirements from their implementation in the commercial/procurement functions; for example, delegating the oversight to our legal, risk or sustainability functions; and
- > empower our Anti-Slavery Committee to mediate with our suppliers, and suspend or end a supplier relationship where non-conformance action plans have not been satisfactorily met.

### COVID-19

During the pandemic, we worked with our suppliers to try and help maintain supply chain governance and levels of employee welfare. This included:

- > providing ample notice periods so suppliers were able to meet the award requirements in relation to shift changes;
- > encouraging our suppliers to explore all opportunities for government income support programs and providing support where possible;
- > working to redeploy cleaning staff to other tasks as a result of reduced cleaning service requirements; and
- > ensuring all pricing included ongoing statutory obligations for cleaning staff who have been stood down as a result of COVID-19.

Where possible, we will continue to work with our suppliers to offer their employees the same roles they had before the COVID-19 pandemic.

### Next steps

We are committed to sharing knowledge about our processes and the findings of our first traceability study, which we are currently undertaking. As well as sharing through this statement, we will also provide information to our property colleagues through the PCA and to wider industries through the UN Global Compact Network of Australia.

In addition, we have been contacted by multiple Australian companies requesting more detailed information of this study, and we are proactively sharing this knowledge in the hope it advances our overall Australian capability.

We will now refer back to our detailed risk mapping and consult with other organisations to see which spending category we should analyse next. Some of the categories we are considering include glaziers (for building facades), joinery and carpentry, structural steel and fixtures and fittings.

3. Sedex Members Ethical Trade Audit.

4. Business Social Compliance Initiative.







# GOVERNANCE AND REMEDIATION

## Governance

It is vital to ensure that the way we scan for and address human rights violations and modern slavery in our operations and our supply chains is continually improving at Mirvac. To this aim, we have established an Anti-Slavery Committee (ASC), which is chaired by our Chief Financial Officer and includes senior representatives from across the business.

The ASC reports to the Executive Leadership Team (ELT) and has developed a set of priorities for the next two years, which are aligned with our Board-endorsed plan, and aim to further strengthen Mirvac's approach to modern slavery and human rights. These priorities are to:

- > understand what modern slavery is, why it is important, and how it can have significant impacts on people in our supply chains, as well as those working on our projects and in our operations;
- > design and connect our policies and processes to make it difficult for modern slavery to occur, as well as respond if and when we find instances;

- > generate changes in employee behaviour by sharing awareness, education and training about modern slavery, how to spot it, using our tools and processes, and what to do if you suspect modern slavery is occurring; and
- > take a collaborative approach to share our findings transparently across Mirvac, as well as externally.

Members of the Committee are in key leadership positions in our corporate, development, and operational teams, with the authority to oversee policy compliance and work on remediation plans where necessary. We consider it vital that our capability building starts at this leadership level, and have worked this year to build a deep understanding and connection to this issue and its potential for serious human harm.

As a group, we have developed new tools and will continue to develop our processes that align to our existing risk systems, to empower our leaders to react to any non-compliance and reports of modern slavery. Our priority in this work is to achieve a positive outcome and remediation for victims.

In FY20, the Committee met four times and has participated in training provided by Better Sydney and the Supply Chain Sustainability School. The training responded to requirements set out in the Modern Slavery Act and covered topics such as grievance mechanisms, remediation and assessing effectiveness.

## ASC Governance Framework



# GOVERNANCE & REMEDIATION (CONTINUED)

## Policies

Within our internal governance framework, we have a number of policies that set out our expectations for employees and suppliers to act ethically and honestly, comply with all applicable laws, rules, regulations, and to not discriminate unlawfully or engage in any behaviour that is harassing or bullying, or act in any way that puts the health or safety of any Workplace Participant at risk.

These policies, which can be found on our website include our:

- > Code of Conduct
- > Inclusion Policy
- > Procurement Policy
- > Fraud Bribery and Corruption Policy
- > Whistleblower Policy
- > Health Safety Environment Policy.

Our aim is to ensure that human rights issues are understood, respected and upheld by all our employees and suppliers.

We define our expectations with potential and existing suppliers through Mirvac's Vendor Code of Conduct, which includes requirements relating to modern slavery and human rights. Suppliers must agree to adopt these supply chain engagement principles and practices and share them with their sub-contractors.

In addition, the Mirvac due diligence process with suppliers includes pre-qualification checks, contractual arrangements, and ongoing monitoring, including independent third-party corporate social responsibility audits for potential offshore suppliers of key construction materials.

## Remediation

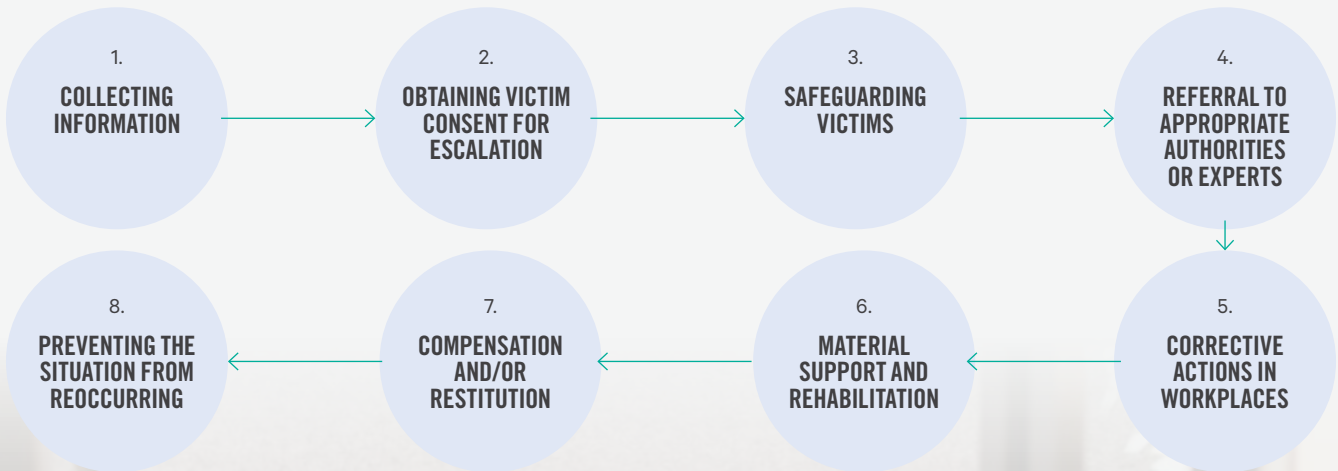
Our ASC is responsible for undertaking the remediation process at Mirvac. We aim to address modern slavery by requiring that our suppliers have modern slavery governance capability, train their workforces, promptly notify us as soon as they become aware of potential or suspected instances, and act in good faith with Mirvac in investigating the circumstances.

Vendors must, to the fullest extent possible, require their suppliers to implement their own binding guidelines for ethical behaviour and compliance with modern slavery laws.

We are in the process of developing and embedding a modern slavery remediation framework (high level process shown below) and plan to incorporate it within our existing incident management, whistleblowing and investigation procedures.

We are also developing an education and training program for our employees and suppliers to highlight our remediation process and ensure our people are equipped to respond to instances of modern slavery appropriately.

### Remediation process includes:





## CASE STUDY

# COLLABORATING WITH OUR PEERS THROUGH THE PROPERTY COUNCIL OF AUSTRALIA

The objective of this partnership is to create resources for our industry that reduce the burden on both companies and our suppliers in scanning for modern slavery risk. We are very pleased to be part of an industry with the capability and commitment to collaborate, and appreciate the PCA's leadership in driving this collaboration.

The shared supplier portal, developed in collaboration with the PCA and 14 other members, enables suppliers to answer a set of questions, outlining their knowledge and the actions they are taking to assess and address human rights and modern slavery. The objective is that each supplier answers these questions just once, and results are then available to be shared across property companies.

Subject matter expertise was, and continues to be, provided by Better Sydney, The Supply Chain Sustainability School and sustainability risk assessment experts, Edge Environment. The online portal is hosted and managed by a corporate social responsibility technology firm, Inform 365.

So far, over 370 questionnaires have been sent to our supply chain with over 270 responses received.

The response of each supplier is made available to other PCA members, which helps to establish consistency and reduce the reporting burden for suppliers in the industry. The platform's intelligent analytics and dashboards also enable better visibility for members, helping them to evaluate potential risks. Importantly, the supplier questionnaire developed for this platform is available for anyone to complete at no cost.

Addressing modern slavery risks can be a complex and challenging process and suppliers' responses and collaboration with other organisations will evolve over time. As suppliers go through this assessment, it will be important that they focus on how they can continue to improve their supply chains and refine their responses in future years. For example, the information they have provided this year may help them to identify new areas of modern slavery risk that they will need to address over the next 12 months. It is our hope that this iterative improvement will lead to our suppliers having an increased understanding of what modern slavery means and where it might be occurring in their supply chains, and be encouraged to communicate to others to show what they're doing to address it.

In addition, we are mindful that we can support our suppliers by connecting them with education and training on human rights and modern slavery. As a founding member of the Supply Chain Sustainability School, we value the resources and knowledge available on these topics, and we share their range of resources with our suppliers.





# EFFECTIVENESS

We recognise the importance of continuous improvement in our approach to combating modern slavery risks. We have set measures to do this, such as establishing performance indicators, as well as establishing working groups and consultation processes with the business. In addition, we have collaborated widely and openly with a number of external experts to ensure that our approach is appropriately scrutinised for effectiveness.

Our actions this year have been focused on raising awareness of the issue of modern slavery within our operations and supply chain. We've also sought to provide our senior leaders with a good understanding of how victims of modern slavery are exploited, and to start the discussion on what appropriate actions need to be taken when problems are found. We are in a phase of implementing procedures with the hope that the true impact of our actions will be felt in the coming years.

The following actions were completed during FY20 as part of a two-year plan that sets our foundation and leads to a pathway of good risk practice in Mirvac:



## ACTIONS TAKEN IN FY20

### Governance

- > Board endorsement of a two-year plan, developed with input and collaboration with our peers, and from across industries, to ensure it is robust.
- > Establishment of the ASC, comprised of key leaders across Mirvac's business.
- > Begun the process of linking modern slavery risk with our existing policies and procedures.

### Capability

- > Focusing Mirvac leadership on what modern slavery is and why it's important.
- > Delivering two sets of training by independent third parties to all members of the ASC.
- > Awareness-raising programs. Over the past two years, we have delivered to over 180 Mirvac employees, including our Board, ELT, the ASC, the Health, Safety, Environment & Sustainability management committee, Mirvac's leadership teams, facilities management, site managers, design teams, and cost planners.
- > Training for all employees is currently under development.

### Risk

- > Independent input into an initial risk scan and feedback from its publication.
- > Testing the key questions to ask of our supply chain by working in collaboration with the PCA.
- > Testing our approach with the UN Global Compact membership, Procurement and Supply Australia, Supply Chain Sustainability School, Be Slavery Free & Clients.
- > Consultation across Mirvac to incorporate all learning into existing processes and systems to manage modern slavery risk.

## PERFORMANCE INDICATORS

### Governance:

- > Entities' attendance to the ASC.
- > Active governance framework being delivered.
- > Number of precedent contracts with modern slavery expectations included.
- > Internal audit of controls (planned for FY21).
- > Continuous improvement of the governance model.

### Capability

- > Number of employees completing training, content of which has been created by experts in the field.
- > Number of awareness-raising programs delivered within Mirvac and externally by Mirvac.
- > Policies and processes reviewed published and communicated.
- > Number of engagement with external experts and victim support groups.

### Risk

- > Number of cases brought to the ASC.
- > Number of cases remediated.
- > Risk assessment deployment.
- > Number of collaborations.





# COLLABORATION

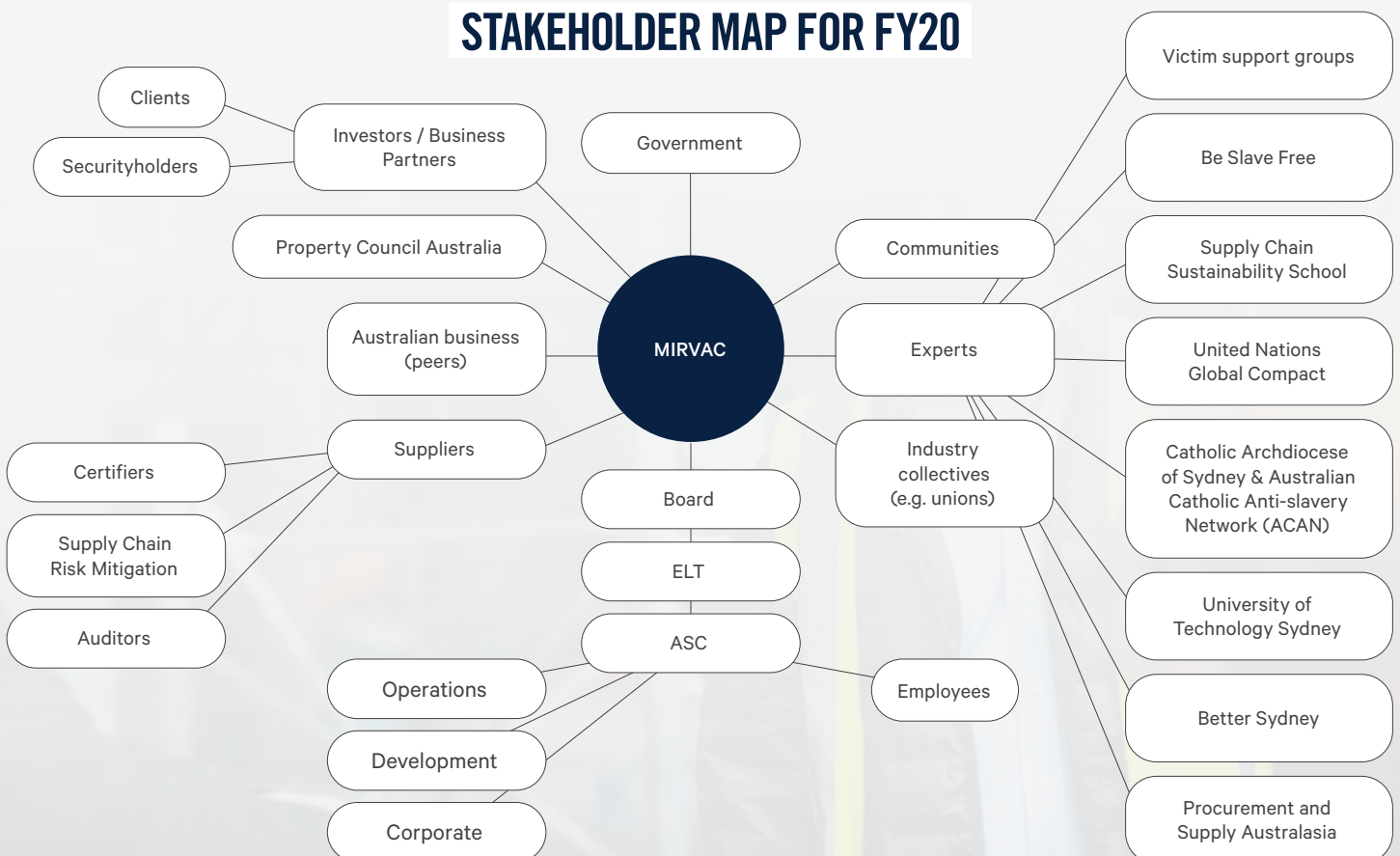
Collaboration and knowledge sharing with our peers, industry groups, governments, not-for-profits and our suppliers is essential in creating change. We have prioritised this set of connections to learn from others, ensure that what we are doing has an orientation beyond compliance, bring our suppliers with us in this direction, and openly share what we're learning for the benefit of others. Our approach to collaborating on modern slavery is outlined as follows:

> We are committed to collaborating in our industry through the PCA, and value the opportunity it affords us to share knowledge and reduce the reporting burden on our supply chain.

- > We are signatories to the UN Global Compact and participate actively in the Australian network.
- > We are founding members of the Supply Chain Sustainability School and share its free resources widely. We also work with other NGOs, such as the Catholic Archdiocese of Sydney, and have taken advice from Be Slavery Free.
- > We were active contributors to consultation on legislation led by the Australian Government Department of Homes Affairs, and have used the opportunity to work with our joint venture partners and peers to share our experience on minimising the risk of modern slavery.
- > We work constructively with our supply chain to focus on collaboration and remediation with an objective of helping to eliminate slavery altogether, rather than just our own supply chain.

- > We have an opportunity to collaborate with some of our top tenants, who are leading Australian businesses. For example, we are partnering on shared experiences with our tenants to incorporate each other's advice and learnings into our approach to eradicating modern slavery.
- > We have had our traceability study peer reviewed by an independent expert, and have shared it in detail with Transurban's procurement, facilities management, and sustainability teams.
- > We participate in a number of external forums on modern slavery to help improve awareness in the business and investment communities.

## STAKEHOLDER MAP FOR FY20



## WHAT'S NEXT?

Mirvac will continue to focus on robust governance, risk management and capability.



### Governance

- > We will take our learnings from our cleaning traceability study to scan our systems for the protective factors which build robustness and make it more difficult for exploitation to occur.
- > We will focus on continuous improvement in monitoring, measuring, and reporting systems by embedding knowledge into decision making processes so that we can better understand our effectiveness.



### Capability

- > Having focused on capability across Mirvac leadership, we will now grow that capability across the organisation with several levels of training, by role and spend authority.
- > We will be progressively supporting our key suppliers with training and capability building by working with the Supply Chain Sustainability School to create resources aimed at small medium enterprises and expanding our awareness program.



### Risk

- > We will revisit our detailed risk mapping study and consult with our stakeholders to decide the next area for a traceability study, building on feedback from our first experience and conducting a deep examination for risks.
- > Building upon our risk matrix and response criteria, we will develop a process for risk management.
- > We will improve our risk identification processes by scanning our supply chain for related indicators; labour exploitation or human rights violations in other areas can often be indicators of conditions for slavery.

Importantly, we will continue to work transparently and collaboratively on this subject with our peers, industry, certification bodies, research groups and victim support organisations so that we can continue to contribute to the abolishment of modern slavery.

### Consultation with controlled entities:

This document was prepared by the ASC that includes senior managers from Office and Industrial, Retail, Residential, Design, Marketing & Sales, Construction and Group functions, including HSE, HR, Risk, Procurement and Sustainability. When preparing this document, senior managers were required to consult with their relevant business units, including where such business units are responsible for controlled entities.