



MODERN SLAVERY STATEMENT FY21

Leakes Road Rockbank Pty Ltd ABN 93 122 773 924¹

Introduction

Leakes Road Rockbank Pty Ltd (“Woodlea”) acknowledges that slavery still exists in the world today, and that businesses have a role to play in supporting its eradication.

Woodlea does not support or condone acts of modern slavery in any form.

This is Woodlea’s first Modern Slavery Statement reporting under the requirements of the Modern Slavery Act 2018 (the “Act”).

1 – Reporting Entity and any other owned or controlled entities

The reporting entity is Leakes Road Rockbank Pty Ltd (“Woodlea”) in its capacity as trustee for the Leakes Road Rockbank Unit Trust. Woodlea does not act as a trustee of any other trusts and does not own or control any other entities.

2 - Description of reporting entity’s structure, operations, and supply chains

Reporting entity and structure

Employing approximately 20 people, Woodlea manages the sales & delivery of a project of the same name in Aintree VIC, encompassing 7,000 residential dwelling lots.

Mirvac Rockbank Pty Ltd & Jayaland Corporation Pty Ltd are each 50% Unitholders in the Leakes Road Rockbank Unit Trust. The Trust business is operated by Woodlea as Trustee through the management committee which comprises of an equal number of Directors from both Mirvac & Jayaland (“Management Committee”).

The Management Committee (currently one Director from each Unitholder) have appointed a Manager (Woodlea Project Director – Matthew Dean) to manage the project on its behalf. The Management Committee is appointed by the Board of directors of Woodlea (“Board”) to manage the Trust Business and the affairs of the Trust on a day-to-day basis in accordance with the

¹ This is the statement to cover Leakes Road Rockbank Pty Ltd as trustee for the Leakes Road Rockbank Unit Trust in which Mirvac Rockbank Pty Ltd and Jayaland Corporation Pty Ltd each own 50% of the Units. It relates to the financial year ended 30 June 2021. This Modern Slavery Statement has been published in accordance with the Modern Slavery Act 2018 (Cth).



Unitholders Agreement and the Woodlea Policies and Procedures Manual, which includes approval of the forms of contracts respect of the development activities on the project.

Woodlea funds its development through a stand-alone construction loan with one of Australia's largest banks, Bank of Melbourne.

Operations

Woodlea operates one development project, which it acquired in the year 2000 and subsequently develops, and markets residential land in Aintree, Victoria.

Woodlea's strategy is to meet market demand for a mix of products in Melbourne's Western Growth Corridor.

Woodlea is primarily developed for residential purposes however certain aspects of the land holding are set aside for non-residential purposes such as retail, education, commercial and sporting facilities.

Supply chains

Woodlea's supply chain across various stages of planning, approval, development, construction, marketing, and sales processes amounted to a direct spend of approximately \$80 million in FY21 comprising the following main categories listed in descending order of magnitude:

Spend Category	
1	Subcontracted services
2	Head Contractor - external
3	Professional services
4	Marketing
5	Materials supply / supply & install
6	Real estate agents
7	Insurance
8	Office supplies, PPE & postage
9	Information technology & communications
10	Premises
11	Human resources
12	Subscriptions
13	Equipment purchase & rental



Impact of Covid-19

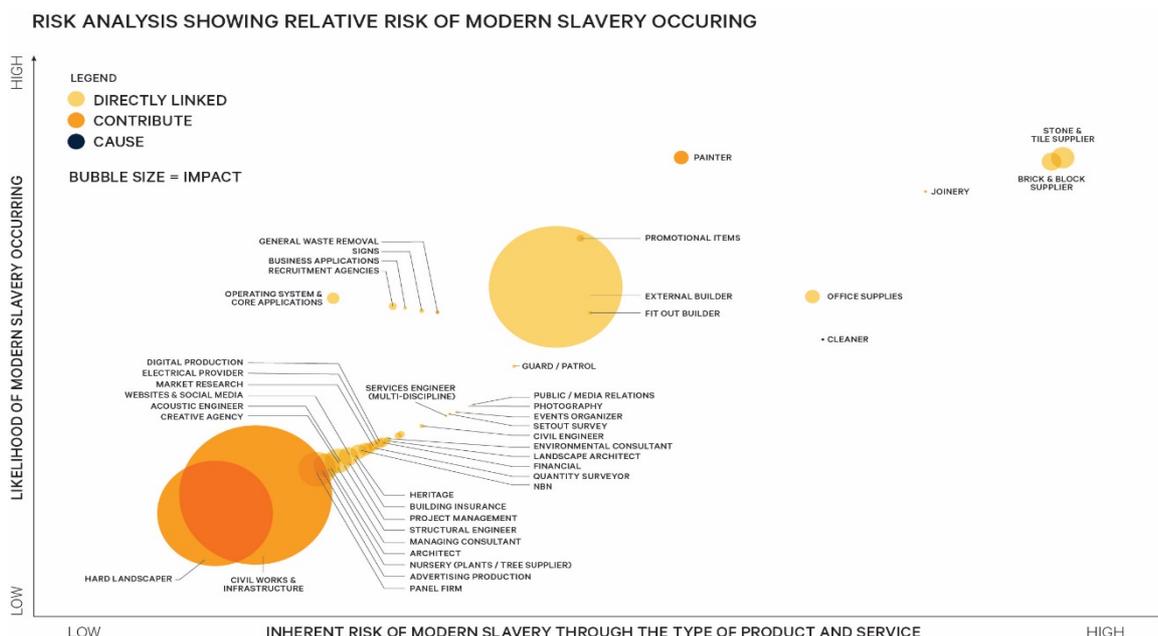
Over the past eighteen months, Woodlea’s major tier one suppliers were heavily affected by the Covid-19 pandemic. The impact of restrictions on business activity, compulsory business lockdowns in Victoria, and restrictions on both interstate and intrastate travel affected Woodlea’s ability to engage with suppliers face to face.

During the Pandemic, Woodlea focused on supporting staff and ensuring the business remained operational. In relation to its tier one suppliers, its initial assessments indicated that there were no heightened modern slavery risks requiring immediate urgent attention. Woodlea’s planned follow up enquiries have been deferred to FY22.

3 - Risks of modern slavery practices in the operations and supply chains of the reporting entity

We acknowledge that no sector or country is immune from modern slavery and we understand that entities operating in the Australian residential development sector may be exposed to modern slavery risks through their operations and supply chains. That said, we consider modern slavery risk in our direct operations to be relatively low on account of the workforce being entirely located in Australia and employed in accordance with Australia’s well-developed workplace laws.

In FY21, we used the United Nations Guiding Principles on Business and Human Rights (UNGPs) three-part continuum to map our supply chain in order to understand where the highest level of potential risk exposure sits based on geographic origin and spend category. The resultant risk map is displayed below:





Details of the UNGPs three-part continuum of involvement are outlined below;

- **CAUSE:** a business can cause an adverse human rights impact where its actions or omissions directly result in the impact occurring. For example, a construction company could cause modern slavery by exploiting its workers.
- **CONTRIBUTE:** a business can contribute to an adverse human rights impact where its actions or omissions substantially contribute to the impact occurring. This includes acts or omissions that may incentivise or facilitate the impact. For example, a cleaning company could contribute to modern slavery by placing unrealistic cost requirements or timeframes on its subcontractors, which could likely only be met using exploited labour.
- **DIRECTLY LINKED:** a business can be directly linked to modern slavery where it is directly connected to modern slavery through the activities of another entity that it has a business relationship with, such as a sub-supplier. For example, a security company may purchase uniforms for its staff made by a supplier with textiles produced by a third supplier using modern slavery.

We use this continuum to understand how we may be at risk of involvement in modern slavery, as shown in our risk map above. Importantly, we also use this continuum to help us identify how we should respond to potential modern slavery risks, based on our involvement in the risk.

The horizontal axis of the graph above looks at the inherent risks of the industry and product, while the vertical axis shows the likelihood (including geography) of the potential risk. The size of the bubble indicates our relative spend, while the colours indicate whether Woodlea's actions could cause, contribute to, or be directly linked to modern slavery in line with the UN Guiding Principles on Business and Human Rights (UNGPs).

We have identified the top right quartile (comprising "stone & tile supplier" and "brick and block supplier") to form the subject matter of a deep dive in FY22.

4 -Actions taken to assess and address these risks, including due diligence and remediation processes

FY21 Actions

The Board through the Management Committee is responsible for overseeing the management of Woodlea's modern slavery risk. Woodlea's employees regularly undertake risk management activities which assists the Board and Management Committee with governance matters for Woodlea, including the active identification of risks and implementation of mitigation measures.

There are a number of policies which support the development and retention of a fair and safe workplace and the objectives or eradication of modern slavery including:



- Woodlea’s Policy and Procedures Manual which outlines procurement procedures (including the requirement to tender and evaluate based on considerations outside of price including quality and record of safety);
- Woodlea’s Ethics & Conflict of Interest Policy; and
- Woodlea’s Customer Complaints Policy.

As noted in section 3 Woodlea’s primary action in relation to modern slavery has been risk mapping its supply chain to understand where risk likely resides.

Next Steps

During the year ending 30 June 2022, Woodlea will establish a Modern Slavery Working Group, reporting to the Management Committee in order to:

- Gain a detailed understanding of the risk of modern slavery occurring within Woodlea, including its operations and supply chains.
- Have dialogue with its major suppliers in respect to their modern slavery risks.
- Commence the development of a plan to implement systems and processes to mitigate against the risks of modern slavery within Woodlea, including its operations and supply chains.

Actions to be completed during the year ended 30 June 2022 include:

- Preparation of a Modern Slavery Policy.
- Investigation and consideration into adopting a supplier code of conduct
- Creation of a Modern Slavery Working Group.
- Training provided to operational Modern Slavery Working Group members. Continuation of mapping and dissecting operation processes and tier one supply chains.
- Continuation of assessment of supply chain risks.
- Initial consultation with several major tier one operational suppliers in particular in the “stone & tile supplier” and “brick and block supplier categories.
- Discussions held with other industry peers to determine if any other modern slavery risks should be investigated.

Actions to be developed beyond FY22:

- Formal Supplier Code to be created, adopted and implemented. Adherence by suppliers can initially be monitored through the use of questionnaires.
- Formal consultation with all tier one suppliers.
- Formal contracts to be reviewed for compliance with Woodlea’s Modern Slavery Policy and Supplier Code.
- Training provided to staff in the form of reporting suspected breaches of Woodlea’s Modern



Slavery Policy through Woodlea's existing risk reporting mechanism.

Where a risk of modern slavery is identified, Woodlea will strive to work with suppliers in both understanding and educating them in Woodlea's stance in relation to modern slavery.

5 - Assessing the effectiveness of actions

Woodlea's processes and procedures in response to modern slavery risks are in the early stages of implementation. Woodlea will seek to continue to develop its processes and procedures to better understand and further mitigate against the risks of modern slavery.

Woodlea measures the effectiveness of its actions through:

- Regular reviews of its response to modern slavery, including reviews of its risk assessment procedures, via the Modern Slavery Working Group.
- Being mindful of and managing risks in its supply chain.
- Discussions with peers and suppliers.
- Corporate policy reviews conducted periodically, as required, and overseen by the Board.

6 - Describe the process of consultation with any entities the reporting entity owns or controls

There are no entities owned or controlled by Woodlea requiring consultation on the content of this Statement, however Woodlea has consulted with the Mirvac Group (being one of its Unitholders) which has a well-resourced Modern Slavery Working Group.

7 - Any other relevant information

Nil.

This statement was approved by the Woodlea Management Committee in its capacity as principal governing body on 23rd December 2021.

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Peng Hong Wong
Management Committee Member
Leakes Road Rockbank Pty Ltd

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Sarah Elysa Elizabeth Anderson
Management Committee Member
Leakes Road Rockbank Pty Ltd