



# *Modern Slavery Statement*

Land Services WA Holdings Pty Ltd as trustee for the Land Services  
WA Holdings Trust (Land Services WA)

1 July 2023 to 30 June 2024

## 1. ABOUT OUR MODERN SLAVERY STATEMENT

Our Modern Slavery Statement for the Financial Year 2023-24 was prepared under the *Modern Slavery Act 2018* (Cth) (the **Modern Slavery Act**). This Statement sets out our actions to assess and minimise risks of Modern Slavery in our operations and supply chains.

Land Services WA Holdings Pty Ltd (ACN 635 079 873) as trustee for the Land Services WA Holdings Trust (ABN 90 684 886 625) (**Land Services WA** or **LSWA**), is a private Australian-domiciled trust, in its own right and on behalf of its controlled entities. Our statement is a joint statement on behalf of Land Services WA for entities which are reporting entities under the Modern Slavery Act and other controlled entities which are not reporting entities under the Modern Slavery Act but are included for transparency purposes (together the **LSWA Group**). Appendix 1 to this Statement sets out the location in this Statement of the mandatory disclosure topics required by section 16 of the Modern Slavery Act. A list of the reporting entities, and other controlled entities that do not meet the threshold for reporting entities under the Modern Slavery Act but have been included is at Appendix 2 to provide an accurate description of the LSWA Group's activities in assessing and addressing Modern Slavery.

Unless explicitly provided otherwise, the information in this Statement provides a consolidated depiction of the LSWA Group's actions. This Statement applies for the following Reporting Period of 1 July 2023 to 30 June 2024 (the **Reporting Period**). Unless stated otherwise, all figures are for the financial year ending 30 June 2024.

Prior to Board approval, this Statement was reviewed and endorsed by the LSWA Chief Executive and Company Secretary. Consultation with controlled entities is set out in section 6. This Statement will be reviewed and updated annually or more frequently if needed to meet regulatory requirements.

This Statement for the financial year ending 30 June 2024 was approved by the Board of Land Services WA Holdings Pty Ltd (ACN 635 079 873) as trustee for the Land Services WA Holdings Trust (ABN 90 684 886 625) on 4 December 2024, which acting as a higher entity under section 14(2)(d)(ii) of the Modern Slavery Act, approved the Statement for other LSWA Group entities. The Board have delegated authority to the Chairperson and Chief Executive Officer to sign and submit this Statement for and on behalf of the LSWA Group.



**Christopher Mark Butcher**  
Chairperson



**Eugene Soares**  
Chief Executive Officer

**Dated: 9 December 2024**



## 2. INTRODUCTION

### Purpose

Land Services WA was appointed in October 2019 as the Service Provider to Landgate, the Western Australian Land Information Authority to provide, improve and maintain the systems that facilitate Landgate's automated titling services, including document and plan processing, searches and associated products and services.

LSWA is committed to the prevention of all forms of Modern Slavery including servitude, forced and compulsory labour and human trafficking in our business and supply chains. LSWA supports the goals of the Modern Slavery Act and prides itself on acting ethically and responsibly, and we expect our people and suppliers to share our commitment to ensuring Modern Slavery practices do not exist in any area of our business and supply chain.

LSWA acknowledges that freedom from slavery is a fundamental human right. LSWA also recognises that slavery can take many forms. The Modern Slavery Act defines modern slavery as including eight types of serious exploitation (collectively **Modern Slavery**). Below is the summary of the eight types of serious exploitation that LSWA provided its employees in its 2024 Modern Slavery Training.

<b>Human Trafficking</b> <ul style="list-style-type: none"> <li>Physical movement of people across or within borders through coercion, threat or deception with the purpose of exploiting them when they reach their destination.</li> </ul>	<b>Slavery</b> <ul style="list-style-type: none"> <li>Situations where people are owned by others.</li> </ul>	<b>Servitude</b> <ul style="list-style-type: none"> <li>When a person does not consider themselves free to leave or stop working because of coercion, threat or deception.</li> </ul>
<b>Forced Labour</b> <ul style="list-style-type: none"> <li>When a person is not free to stop working or leave their place of work</li> </ul>	<b>Debt Bondage</b> <ul style="list-style-type: none"> <li>When a person works to repay a real or perceived excessive debt that they may never be able to pay off.</li> </ul>	<b>Deceptive Recruitment</b> <ul style="list-style-type: none"> <li>When a person is deceived about their work and their work involves exploitation through a type of modern slavery.</li> </ul>
<b>Forced Marriage</b> <ul style="list-style-type: none"> <li>When a person has been forced to marry without giving their full and free consent.</li> </ul>	<b>Worst Forms of Child Labour</b> <ul style="list-style-type: none"> <li>The worst forms of child labour, is when a child is working under threat of penalty, menace or significant harm</li> </ul>	

The purpose of this Statement is to outline the policies, standards, processes, and approach of the LSWA Group in minimising and protecting against the risk of Modern Slavery within our business operations and supply chains.

LSWA looks to continually improve our reporting under the Modern Slavery Act and our approach to managing and mitigating our Modern Slavery risks. In 2023-24 we have taken proactive steps to build on what we previously committed to and expand upon it with new training delivered to more than 100% of employees. We have also taken a more comprehensive review of our suppliers including undertaking targeted supplier questionnaires. This Modern Slavery Statement expands on what we delivered compared to our objectives for this period and our future objectives.

### 3. OUR STRUCTURE, OUR OPERATIONS AND OUR SUPPLY CHAIN

#### Our Structure

Our appointment was the result of the Landgate Partial Commercialisation Program, and we were entrusted with the provision, improvement, and maintenance of Landgate's automated Titling, Plan, Search, and various Commercial Services.

Our exclusive concession operates for a 40-year term with Landgate and the State of Western Australia. At our core, Land Services WA is a technology solution provider, working collaboratively with the State of Western Australia as well as clients and partners. We are committed to delivering products and services that support growth, efficiency, and risk management imperatives. In conjunction with Landgate and the State of Western Australia, Land Services WA can leverage access to land and property data to develop product or service solutions for the community. This has culminated in several approved products.

Since inception we have grown into a trusted partner for Landgate and the State of Western Australia, delivering high value, reliable services, while transforming and moving our services into the digital environment. We have also invested for improved customer outcomes and enhanced security of the register. This has culminated with the Land Services WA Group having an annual turnover over \$100 Million in the fiscal year ending 30 June 2024.

All of this helps us work towards our vision of delivering highly valued and trusted services to the community, and being recognised for the creation of innovative solutions. Backed by our values of **One Team, Respect, Integrity, Innovation, and Excellence**, we make this Statement by continuing to improve our management of Modern Slavery risks and complying with our regulatory obligations under the Modern Slavery Act.

We operate under the business name, "Land Services WA" and we have our registered offices at Level 1, 3 Craig Street, Burswood WA 6100. This Statement is being made by Land Services WA Holdings Pty Ltd as trustee for the Land Services WA Holdings Trust. LSWA has a range of wholly-owned entities that support the LSWA Group, these entities are listed in Appendix 2.

LSWA is a privately owned entity operating a trust structure and operating entities, these are listed in Appendix 2. The ultimate owner of Land Services WA are institutional investors who either directly or indirectly through wholly owned subsidiaries own shares and units in Land Services WA. The institutional investors are:

- Australian Retirement Trust, one of Australia's largest superannuation funds formed through the merger of Sunsuper and Qsuper with 2.3 million members and are an industry superannuation fund. Further information about Australian Retirement Trust is available at: [www.australianretirementtrust.com.au](http://www.australianretirementtrust.com.au).
- Macquarie Group Limited is a global financial services group operating in 34 markets and listed on the Australian Securities Exchange (ASX: MQG). Macquarie Group, through its subsidiary, Macquarie Asset Management has invested into Land Services WA. Further information about Macquarie Group Limited is available at: [www.macquarie.com](http://www.macquarie.com).
- PSP Investments are one of Canada's largest pension investment managers for members of the public sector pension plans of the federal public service, the Canadian Forces, the Royal Canadian Mounted Police and, the Canadian Reserve Force. Further information about PSP Investments is available at: [www.investpsp.com/en](http://www.investpsp.com/en).
- HESTA are a specialist industry superannuation fund with deep connections to health and community services, having earned some of the super industry's highest accolades. Further information about HESTA is available at: [www.hesta.com.au/members](http://www.hesta.com.au/members)

The wholly-owned entities within the LSWA Group are within the control of the LSWA Group and the LSWA Group is a closely held group with a common Board of Directors and officers appointed to Land Services WA. Each controlled entity within the LSWA Group operates under the direction and governance of LSWA and all share the same executive management team.

All LSWA entities are governed by the parent company's process and policies. The LSWA procurement policies and process apply across all LSWA entities, employees, contractors and third-parties engaged to act on behalf of LSWA. Additionally, LSWA's Code of Conduct which applies across the LSWA Group specifically calls out zero tolerance towards Modern Slavery.

## Our Operations

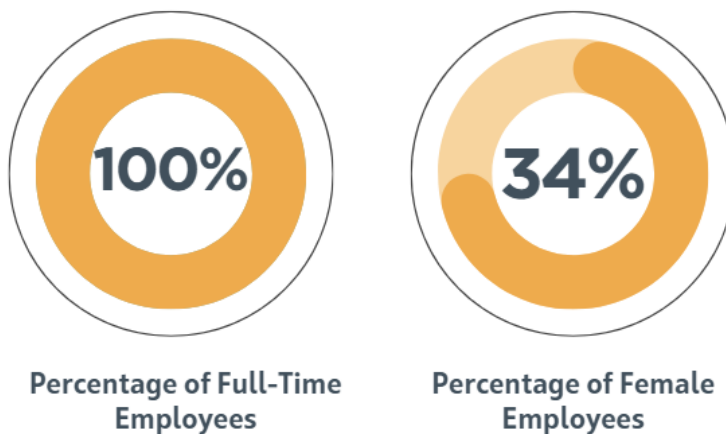
The LSWA Group primarily provides **Information Communication and Technology (ICT) Services**. These divisions are supported by an overall corporate division which includes Human Resources, Finance, Shared Services and Customer Services. Our team supports our core business which is to provide, improve and maintain the systems that facilitate Landgate's automated titling services, including document and plan processing, searches and associated products and services.

Our main services include:

- provision of property data and information services; and
- ICT software development and support.

LSWA trades under the business names "Land Services WA".

Our core LSWA employees work in Perth out of our registered office. All of our LSWA employees are full time. LSWA's business is predominately focussed on managing the key concession with Landgate and our trusted service providers that support us in our delivery of ICT services to Landgate. Our employees are largely management and finance professional.



LSWA recognises that while our workforce is comparatively small, we are primarily an ICT business that operates in a typically male dominated environment. However, LSWA is working to ensure, as much as practically possible, that we employ from a diverse background including gender, ethnically and culturally diverse backgrounds.

For more information on LSWA's business, please refer to our website at: <https://www.landservices-wa.com.au/>.

## Our Supply Chain

Given LSWA's primary operations relate to the supply of ICT related services, our cost base is primarily comprised of people related costs and ICT expenses. LSWA is a moderate purchaser of goods and services required for our business ranging from single occasion purchases to longstanding contractual relationships. In the Reporting Period, the LSWA Group had a total annual spend of approximately **\$26,000,000** on goods and services procured from approximately **92** suppliers.

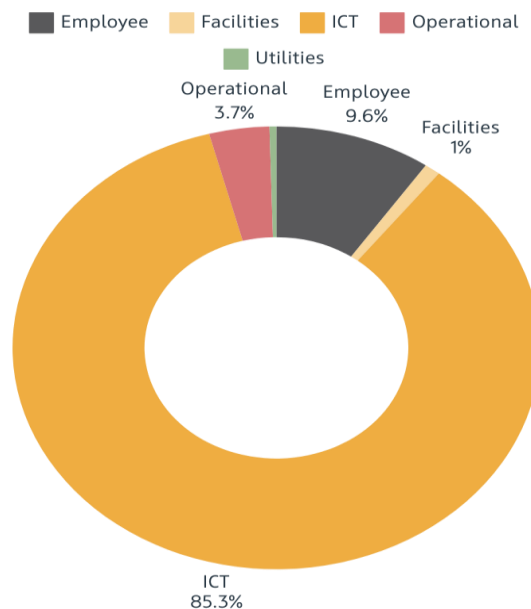
Our major suppliers are generally engaged on a fixed term basis typically ranging from project specific timeframes (e.g., 3-12 months) to longer master services agreements for 3 years or on an ongoing basis. While we

predominantly use Australian suppliers, we also use global suppliers in six other countries. Regardless of location, the LSWA Group partners closely with our direct suppliers to understand and evaluate their supply chain practices and we actively seek to engage with suppliers and other third parties who share similar values, ethics, and sustainable business practices.

During the Reporting Period vendors and suppliers located overseas comprised approximately **4%** of all third-party vendor spend. In the Reporting Period, LSWA expenditure on overseas suppliers represented a decrease from the previous period of 2.06%.

Country	Percentage of Spend	Estimated prevalence of Modern Slavery (per 1,000 population) <sup>1</sup>	Estimated number of people in Modern Slavery	Risk Rating <sup>2</sup>
Australia	95.86%	1.6	41,000	Low
Canada	0.04%	1.8	69,000	Low
Ireland	0.02%	1.1	5,000	Low
United Kingdom	0.16%	1.8	122,000	Low
United States of America	3.91%	3.3	1,091,000	Medium
High Risk Countries <sup>3</sup>	0.00%	-		N/A

Breakdown of spend across all supplier categories



<sup>1</sup> Walk Free Foundation, The Global Slavery Index 2023, Appendix 2, Table 26.

<sup>2</sup> Based on the estimate prevalence of Modern Slavery (per 1,000 population) assessed as Low (less than 3 victims per 1,000 people); Medium (less than 7 but more than 3 victims per 1,000 people); and, High (greater than 7 victims per 1,000 people).

<sup>3</sup> The 10 countries with highest prevalence of Modern Slavery globally, along with North Korea and Eritrea, are Mauritania, Saudi Arabia, Turkiye, Tajikistan. United Arab Emirates. Russia, Afghanistan and Kuwait. Source: Global Slavery Index – 2023.

## RISKS OF MODERN SLAVERY PRACTICES

LSWA understands that the nature and extent of Modern Slavery globally means that Australia is not immune from Modern Slavery and that there is a risk that it may be present in its operations and supply chains.<sup>4</sup> The United Nations and Walk Free Foundation have estimated that there are approximately 50 million victims of Modern Slavery around the world.<sup>5</sup> Preventing our own involvement in Modern Slavery forms part of our own commitment to operate a responsible and safe business and understanding the critical South Australian economic infrastructure of which we are custodians.



We have assessed the risks of Modern Slavery in our **operations** and also in our **supply chain**.

### Modern Slavery Risks in Our Operations

LSWA takes a risk based approach to the managing the risk of Modern Slavery within our operations and our supply chains. This is largely based on the types of goods and services we procure as well as the geographic region.

LSWA directly employs eight people, all of which are full-time employees with all employed under individual employment contracts that meet or exceed the minimum legal entitlements in Australia. Given the small number of employees within our workforce, plus the fact that all of our workforce is based in Perth and have some level of further education, this does not typically lend itself to a situation where there is a prevalence of Modern Slavery.

We take the wellbeing of our employees seriously, with all employees having access to an Employee Assistance Program and a Whistleblower service. Additionally, all employees annually are required to complete a Code of Conduct sign-off which, as part of our Code of Conduct highlights the risks of Modern Slavery. Our Code of Conduct sets the broad standards expected of all employees, one of which is to not engage in Modern Slavery. Our employees also undertook Modern Slavery training which highlights what Modern Slavery is, risk factors that may lead to Modern Slavery, and how to escalate suspicions of Modern Slavery.

As part of our employee onboard, we confirm that all employees have a right to legal work in Australia and confirm their visa or permanent residency.

At LSWA we continually aim to create a welcoming and inclusive environment. We have a number of policies, including our Flexible Work Policy, and Right to Disconnect Policy collectively work to support our staff to feel empowered and to be their authentic self to speak up. Our Workplace Discrimination, Harassment and Bullying Policy and Employee Grievance Policy address inappropriate workplace behaviour support employees affected by improper conduct.

Given this, the risks of Modern Slavery in our operations is, in our assessment, **very low**.

<sup>4</sup> Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities - (8-12), available at URL: <https://www.homeaffairs.gov.au/criminaljustice/files/modern-slavery-reporting-entities.pdf>.

<sup>5</sup> Ibid.



## Operational Risks

The key risk to our operations is in the acquisition of office IT hardware. As a digitally enabled business all our staff have company issued laptops and other hardware that goes through a standard asset lifecycle, resulting in cyclical end of life replacements.



## Supplier Industry Risks

The risk is in our procurement of goods and services from the following industries, that while low risk are worthy of our attention:

- Office Services
- Software Services
- Professional Consulting Services



## Supplier Location Risks

The risk of our suppliers having a registered Australian business, but a global corporate footprint creates greater risk of modern slavery exposure.

## Operational Risk - Controls

The supply chain process for production of IT hardware has been highlighted as one of the key industries of concern for Modern Slavery practices, and Land Services WA will remain vigilant in our procurement practices to maintain our standard of providers.

## Supplier Industry - Controls

The key focus area for Land Services WA is that while our suppliers are domestic with domestic staff providing our services, software as a service poses a higher risk exposure extra territorially and will face greater scrutiny as part of our procurement process.

## Supplier Location - Controls

The key focus area for Land Services WA will be to undertake regular review of our new providers, and any global operations they may have to ensure any risk is known and reviewed to ensure our standards are met.

## Modern Slavery Risks in Our Supply Chain

While the professional services sector is not typically associated with Modern Slavery practices, we are conscious that risks can also arise in certain industries connected to the professional services sector – in particular in the supply of goods and services in relation to:

- IT and electronic equipment where such goods may have been manufactured by another entity using minerals sourced or mined using forced labour; and
- labour hire.

As our operations are based and occur solely in Western Australia, and considering the relevant sector and products and services risks to LSWA, we are at comparatively lower risk than other reporting entities within our industry. In addition, having regard to our purchases from our sole medium risk country (being technical ICT software from the United States), there is holistically little risk that the goods and services directly form part of the products at risk of forced labour.<sup>6</sup> We recognise that we have undertaken limited due diligence on our major suppliers with no due diligence undertaken on the suppliers to our suppliers.

However, and while we predominantly use Australian suppliers, we recognise that several of our suppliers have global operations and therefore we must remain vigilant of the potential risk for the LSWA Group to be directly or indirectly linked to Modern Slavery practices. Accordingly, as assessed through the LSWA Group's risk management framework, LSWA Group's Modern Slavery risk in our supply chains has been assessed as a **low** risk.

We acknowledge, and are working to understand, the vulnerabilities and potential risks with those suppliers whose global operations pose as an increased susceptibility to Modern Slavery supply chain issues.

## 4. OUR APPROACH TO TACKLING MODERN SLAVERY PRACTICES

We adopt a multi-layered approach to managing Modern Slavery risks within our business focussing on our corporate governance framework and our systems, processes, policies, and procedures (including group-wide policies, management/operating procedures, our enterprise risk appetite, and Risk Management Framework).

<sup>6</sup> Walk Free Foundation, The Global Slavery Index 2023, Appendix 3, Table 40.



## Corporate Governance Framework

Board	Executive	Employees
<p>The Board is responsible for setting the strategic direction and risk appetite for the LSWA Group (now through the Risk Committee) and ensuring general oversight and monitoring of the risk culture through Reports provided to the Board and, now, Risk Committee by the Executive.</p> <p>In respect to Modern Slavery risks this includes the ongoing assessment of Modern Slavery risks as raised by the Executive and approving this Statement annually.</p>	<p>LSWA has an enterprise risk management framework which provides a consistent approach for identifying, analysing, evaluating, treating, monitoring, and reporting risks at all levels of the organisation. The Chief Executive with support from the Executive, is accountable for:</p> <ul style="list-style-type: none"> <li>• monitoring, reviewing, and improving the effectiveness of our approach to risks of Modern Slavery practices within our business; and</li> <li>• ensuring that there are systems in place so that such risks are appropriately controlled.</li> </ul> <p>The operationalised systems, processes, policies, and procedures adopted by us are discussed further below.</p>	<p>Our Code of Conduct applies to all our Employees and requires each person to be treated with respect and dignity. It makes clear our commitment to complying with all laws and acting ethically and with integrity in our relationships in rejecting any form of Modern Slavery practices. As part of their onboarding and their ongoing employment, all Employees are required to familiarise themselves with our Code of Conduct and Whistleblower Protection Policy.</p> <p>Our Whistleblower Policy sets out our commitment to ensuring people are free to question things and raise anything they are concerned about, including practices of our suppliers, service providers or contractors.</p>

## Our systems, processes, policies, and procedures

We have established policies relevant to identifying, assessing, and mitigating the risks of Modern Slavery practices in our business as listed below. Our policies ensures that we meet our ethical business objectives and comply with our legal obligations. These policies are approved in accordance with our internal Delegations of Authority Policy and apply to all the entities we own and control.

Our key systems, processes, policies, and procedures which currently relate to the control of Modern Slavery risks include:

- **Code of Conduct:** LSWA Code of Conduct reinforces LSWA's position on human rights and Modern Slavery. All employees are expected to abide by the spirit, as well as the strict requirements, of the Code of Conduct and applicable policies and procedures – employees are expected to ask not just “can we” but “should we”. Each year employees are required to confirm they have read and understood, and confirm their commitment to the Code of Conduct (including, where appropriate, reporting non-compliances). This is also a compulsory component of new employee inductions. The Code of Conduct is reviewed at least annually.
- **General Policies:** We have implemented several policies to ensure we act ethically and with integrity and observe fundamental aspects of human rights in all our business and employee relationships. These include our Code of Conduct and our work health safety policies (including our Workplace Discrimination, Harassment and Bullying Policy, which encompasses diversity and inclusion).






- **Our template agreements:** Our material consultancy agreements have modern slavery clauses which align with accepted practice. These are reviewed annually for appropriateness having regard to any evolving Modern Slavery risks within our supply chain.
- **Pre-employment screening and employment terms:** LSWA operates in a highly regulated environment and has robust policies and procedures concerning employment screening (including work eligibility checks), employment conditions (including fair pay and hours) and appropriate workplace behaviour. For example, all employees undertake extensive pre-employment background checks as part of our recruitment process and work terms and conditions are clearly outlined in an employee's contract.
- **Safe workplace:** LSWA is committed to maintaining a safe workplace that values equal opportunity and is free from discrimination, harassment, and victimisation. LSWA is also committed to maintaining an environment where staff feel comfortable raising issues or concerns and do not experience detriment because of speaking up. This is reinforced through various avenues for raising concerns including those embedded in our Code of Conduct and Whistleblower Policy.
- **ESG Reporting:** LSWA participates in annual global ESG benchmarking to measure LSWA's performance across all material social, governance and environmental issues including aspects of Modern Slavery.
- **Modern Slavery Training:** In 2024, LSWA implemented a new modern slavery training designed just for LSWA. We are proud that in this current reporting period, all available employees completed this training. This training aimed to help ensure our people understood what Modern Slavery is, how to identify risks of Modern Slavery, and how to appropriately escalate suspicions of Modern Slavery.
- **Procurement Practices:** As part of onboarding of new major (over \$200,000) consultancy and procurement agreements, all suppliers in this category are reviewed to see whether they have a modern slavery statement. In select cases, this check may occur for other suppliers.

LSWA recognises that continuous improvement is a key element of creating an effective compliance and risk management system. Accordingly, the above systems, processes, policies, and procedures will be continually reviewed to ensure they remain effective and appropriate to control Modern Slavery risks within LSWA operations and supply chains. In this regard, see further at "*Modern Slavery risk management tasks undertaken in the Reporting Period*" and "*Looking Ahead*" for future activities planned for the next Reporting Period. In 2024 LSWA began working on our template Grievance Mechanism to address any Modern Slavery matter that arises within our operations or supply chains. Our template Grievance Mechanism is based off a simplified version of the template modern slavery grievance mechanism provided by UN Global Compact Australia<sup>7</sup> and is set out on the next page.

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<sup>7</sup> See: [https://unglobalcompact.org.au/wp-content/uploads/2021/03/4261-UNGC-Grievance-Mechanisms-GUIDANCE-DOC\\_28pp-9-FA.pdf](https://unglobalcompact.org.au/wp-content/uploads/2021/03/4261-UNGC-Grievance-Mechanisms-GUIDANCE-DOC_28pp-9-FA.pdf)

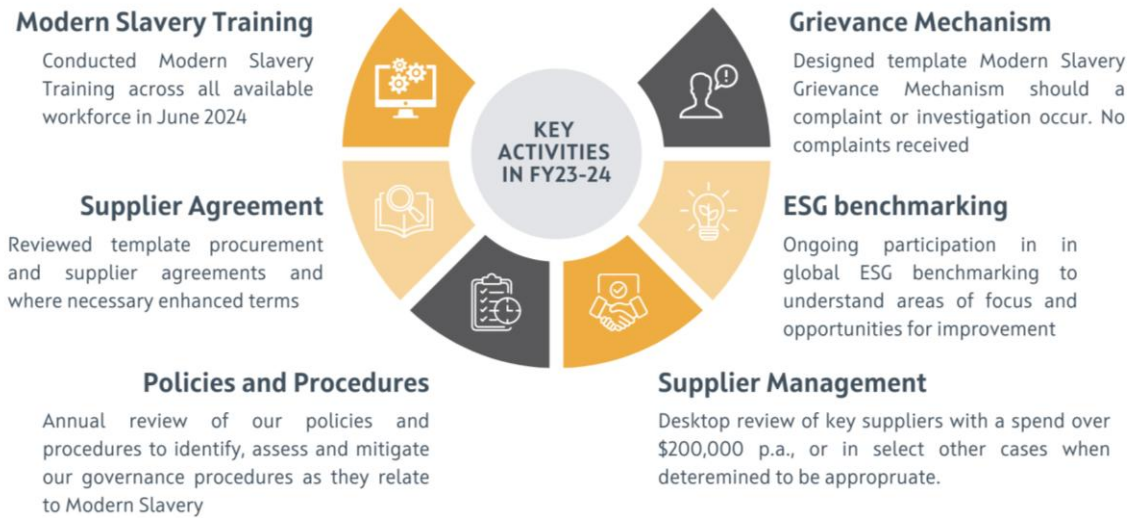
## Template Modern Slavery Grievance Mechanism

 <b>LSWA Modern Slavery / Compliance Team</b>	 <b>Initiator of Grievance</b>	 <b>Subject matter Experts and other Business Units</b>	 <b>Executive Leadership Team</b>	 <b>Third Party</b>
1. Receive the grievance.	✓			
2. Grievance is acknowledged and communicated with Initiator.	✓	✓	✓	✓
3. Investigation of grievance and determine whether Modern Slavery grievance, and if not determine appropriate business unit for support relaying to the Initiator inform next steps.	✓	✓	✓	✓
4. If a Modern Slavery investigation, consult, where appropriate, across the business to investigate allegations.		✓	✓	✓
5. Where possible, propose resolution and agree with Initiator, and implement resolution.	✓	✓	✓	✓
6. Monitor resolution and evaluate learnings.		✓	✓	

 Engagement to occur
  Possible engagement

## Modern Slavery risk management tasks undertaken in the Reporting Period

LSWA during the Reporting Period successfully met our committed tasks for 2023-24 and, in some cases, exceeded those tasks. These were in addition to Modern Slavery risks being considered as part of our enterprise risk management framework (including regular review of risks and controls and reporting to LSWA Risk Committee).



## Assessing and reporting on effectiveness

During the reporting period LSWA has not identified any actual or potential cases of Modern Slavery practices within its operations and supply chains.

LSWA undertook a desktop review of 100% of key suppliers (i.e. where spend was over \$200,000 per annum), and we identified that during this period that over 55% of those suppliers had a Modern Slavery Statement. This demonstrates a significant proportion of our key suppliers are required by law, and are otherwise actively managing, Modern Slavery risks in their supply chain. LSWA will continue to evolve how we measure our effectiveness of mitigating Modern Slavery in our supply chains and operations. Even though LSWA increased training across the organisation, there were no reports of Modern Slavery across our organisation. LSWA will continue to report on the progress we have made and review the effectiveness of the measures we have put in place during the next (and subsequent) Reporting Periods. Ongoing reporting will form part of LSWA's standard reporting of enterprise risks to the LSWA's Board and Risk Committee.





## Modern Slavery risk, the impact of COVID-19, the Ukraine and Middle East conflict

Modern Slavery risks are constantly evolving. Throughout the year LSWA continues to see effects on people and business globally as the world faces increasing armed conflicts, assaults on democracy and the reduction in women's rights with the continued economic and changing social impacts of the COVID-19 pandemic.<sup>8</sup> While at the same time there has been further disruption to the global economy as the conflict in the Ukraine heightens and subsequently impacts the rest of Europe and the world, and the conflict in the Middle East.

The health and safety of our employees and customers remains our key focus. While COVID-19 is far from the challenge it posed in previous years, LSWA is cognisant that it has led to changes in global supply chains. LSWA is extremely proud of how it and its people responded to the pandemic and post pandemic world, maintaining high quality services for industry. LSWA has not been subject to supply chain disruptions as a result of the conflict in the Ukraine, and the Middle East. However, we recognise that these events put pressure on global supply chains as factories are shutdown, orders are cancelled, and people are killed and displaced.

## 5. LOOKING AHEAD

### Our Progress

LSWA is committed to mitigating the risk of Modern Slavery in our operations and supply chains. Additionally, we look to continually review, update and enhance our policies and procedures. While we must look ahead, we must also recognise our achievements. In the 2023-24 Modern Slavery Statement, LSWA set ambitious tasks to further mitigate the risk of Modern Slavery in our operations and supply chains. LSWA is pleased that it has successfully achieved the outcomes it set itself in the 2023-24 Reporting Period.



### Our Future Commitments

LSWA recognises that we must continue to build on our previous achievements and look to continually mitigate the risk of Modern Slavery within our supply chains. Broadly, our higher-level objectives are divided into more training, more supplier questionnaires and enhanced compliance. We discuss these in more detail in the table below.

<sup>8</sup> Walk Free Foundation, The Global Slavery Index 2023, page 2.



## More training

Boost our modern slavery training to be included as part of new employees induction process



## Develop questionnaires

Develop modern slavery questionnaires for high-value suppliers



## Continue Ongoing Compliance

Continue our ongoing compliance including updating policies, and reviewing agreement

Given our commitment to taking proactive steps to mitigate the risk of Modern Slavery within our supplier chains and operations, we set the following goals.

Goal	Description	Status	Future Goal
<b>Modern Slavery Training</b>	Expand annual Modern Slavery training to ensure that all new employees complete the Modern Slavery training as part of their induction.	New	For reporting in FY25 Reporting Period.
<b>Questionnaires</b>	Develop and use Modern Slavery questionnaires, and ensure that they are mandatory for: <ul style="list-style-type: none"> <li>suppliers in high-risk countries; and</li> <li>for suppliers where LSWA has an annual spend of over \$200,000 and who do not have a Modern Slavery statement.</li> </ul>	New	For reporting in FY25 Reporting Period.
<b>Code of Conduct</b>	Update our Code of Conduct to ensure it remained relevant and up to date.	New	For reporting in FY25 Reporting Period.
<b>Supplier Management</b>	Continue to undertake desktop reviews of our suppliers where spend is over \$200,000, or in high-risk countries both current suppliers and when on-boarding. Continue to where appropriate review suppliers prior to onboarding. Confirm that our contracts with key supplier address modern slavery.	Ongoing	For reporting in FY25 Reporting Period.

Goal	Description	Status	Future Goal
<b>Template Supplier Agreements</b>	Annual review of our material consultancy agreement agreements and where necessary expand use to other supplier agreements.	Ongoing and New	For reporting in FY25 Reporting Period.
<b>Policies and Procedures</b>	Annual review of our policies and procedures (including enhancing where necessary), to enable our key people to identify, assess and mitigate the risks of Modern Slavery practices in our enterprise and supply chains.	Ongoing	For reporting in FY25 Reporting Period.
<b>ESG Benchmarking</b>	Continuing to participate in global ESG benchmarking, and work to increase our overall score, to measure performance across all material social issues including aspects of Modern Slavery.	Ongoing	For reporting in FY25 Reporting Period.
<b>Modern Slavery Complaints</b>	Monitor and respond to any complaints received by employees, customers, suppliers, contractors or third parties, including through the Whistleblower Protection Policy.	Ongoing	For reporting in FY25 Reporting Period.

## 6. CONSULTATION WITH OTHER ENTITIES

Each of the entities that we own or control, were engaged in the development of this Statement through the following:

- The LSWA Group is a closely held group with a common Board of Directors and officers appointed to Land Services WA. Each controlled entity within the LSWA Group operates under the direction and governance of LSWA and all share the same executive management. Each LSWA Group entity has the same Company Secretary.
- LSWA has embedded an extensive compliance and risk framework across its entire operations and operates as a single business unit. Modern Slavery risks, as with all enterprise risks, were discussed as part of our regular monthly LSWA Executive Risk Working Group.
- Each entity within the LSWA Group is covered by LSWA's policies, procedures, and systems, including those relating to contracting, purchasing and human resources.
- Our Board, Executive and senior leadership are aware of, and have directly participated in, those activities relevant to our Modern Slavery risk management efforts including our reporting obligations under the Modern Slavery Act.

Additionally, in preparing this Modern Slavery Statement, LSWA consulted across the LSWA Group through the Legal Team, as well as this through our executive management and senior leaders who operate in a centralised process.

Each Director within the LSWA Group has reviewed this Modern Slavery Statement as part of our consultation process.

Accordingly, all entities within the LSWA Group, including entities which are Reporting Entities, were engaged in the development of this statement, are aware of their obligations under the Modern Slavery Act and have been consulted as part of the preparation and submission of this Statement.





## APPENDIX 1: MANDATORY REPORTING CRITERIA

This Statement was prepared to meet the mandatory reporting criteria set out at section 16 of the Modern Slavery Act. The below table identifies where each criterion is addressed within the Statement.

Mandatory Criteria		LSWA Modern Slavery Statement	Page Reference
1.	Identify reporting entity.	About our Modern Slavery Statement Appendix 2	1 16
2.	Describe the reporting entity's structure, operations, and supply chains.	Introduction Our Structure, Our Operations and Our Supply Chains	2 to 3 3 to 5
3.	Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Risks of Modern Slavery Practices	7 to 8
4.	Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes.	Our Approach to tackling Modern Slavery Practices	9 to 13
5.	Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address Modern Slavery risks.	Our approach to tackling Modern Slavery Practices Looking Ahead: Our Progress	9 to 13 13
6.	Describe the process of consultation with any entities the reporting entity owns or controls.	About our Modern Slavery Statement Consultation with other entities	1 15 to 16
7.	Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Looking Ahead: Our future commitments	14 to 15

## APPENDIX 2: LAND SERVICES ENTITIES

### Reporting Entities:

Land Services WA Holdings Pty Ltd (ACN 635 079 873) as trustee for the Land Services WA Holdings Trust (ABN 90 684 886 625)

Land Services WA Operating Pty Ltd (ACN 635 080 232) as trustee for the Land Services WA Operating Trust (ABN 91 750 349 819)

### Other Entities (Non-reporting):

Land Services WA Employee Pty Ltd ACN 635 080 581

Summer Finance Company Pty Ltd ACN 634 670 296