



Modern Slavery Statement

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 SA Holding Pty Ltd (ACN 618 228 096) as trustee for the Land Services SA Holding Trust (ABN 14 477 089 305) (**Land Services SA** or **LSSA**), 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 SA 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 **LSSA 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 LSSA Group's activities in assessing and addressing Modern Slavery.

Unless explicitly provided otherwise, the information in this Statement provides a consolidated depiction of the LSSA 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 LSSA Executive. Consultation with controlled entities is set out in section 7. 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 SA Holding Pty Ltd (ACN 618 228 096) as trustee for the Land Services SA Holding Trust (ABN 14 477 089 305) on 16 October 2024, which acting as a higher entity under section 14(2)(d)(ii) of the Modern Slavery Act, approved the Statement for other LSSA 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 LSSA Group.



Christopher Mark Butcher
Chairperson



Brenton Pike
Chief Executive Officer

Dated: 29 October 2024

2. INTRODUCTION

Purpose

Land Services SA was appointed as the exclusive service provider to the South Australian Government (the **State**) for a range of transactional land services and property valuation services previously delivered through the Lands Titles Office and State Valuation Office in October 2017. Since then, we have grown to provide important land and property services in South Australia and across Australia. This includes continuing to help our clients with their property information data and system needs. Additionally, through our acquisition of the Sum Insured business (discussed below), we also now deliver a home-contents insurance calculator to most of Australia and New Zealand’s insurers. 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.

LSSA 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. LSSA 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.

LSSA acknowledges that freedom from slavery is a fundamental human right. LSSA 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 LSSA provided its employees in its 2024 Modern Slavery Training.

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

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

LSSA 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 99% 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

In October 2017, the LSSA Group was appointed as the exclusive service provider to the State of the South Australia in respect of certain land transaction processing, registry and customer services and State valuation services previously administered through the Offices of the Registrar-General and Valuer-General respectively. Our exclusive concession operates for 47 years. Land Services SA has a range of wholly-owned entities that support the LSSA Group, these entities are listed in Appendix 2. While the LSSA Group has employees across Australia, Land Services SA's registered office is Level 9, 101 Grenfell Street, Adelaide, South Australia. The LSSA Group trades under the business names of "*Land Services SA*", "*Relational Data Systems*" and "*Sum Insured*".

LSSA is a privately owned entity operating via a number of trusts and operating entities, these are listed in Appendix 2. The ultimate owner of Land Services SA are institutional investors who either directly or indirectly through wholly owned subsidiaries own shares and units in Land Services SA. 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.
- 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 SA. Further information about Macquarie Group Limited is available at: 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.
- 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

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

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

Who we are and what we do

Land Services SA is a privately held company appointed as the exclusive Service Provider to the South Australian Government for a range of transactional land services and property valuation services in October 2017. These services were previously delivered through the Lands Titles Office and State Valuation Office.

Today we operate in several areas:



Land Registration and Division

Management of the Land Registry – processing over 200,000 property dealings each year.



Property Valuation

Responsibility for the State’s Valuation Roll – valuing over 900,000 properties each year.



Innovation

Building data driven products and services to help industry increase efficiency and accuracy.



Our Operations

The LSSA Group primarily consists of four key divisions: **Lands Titling; Valuations; Commercial; and Information Communication and Technology (ICT) Services**. These divisions are supported by an overall corporate division which includes Human Resources, Legal, Finance, Shared Services and Customer Services. Our diverse team supports our core business which is to provide a range of property transaction and valuation services, property information products, custom data sets and reliable market insights.

Our main services include:

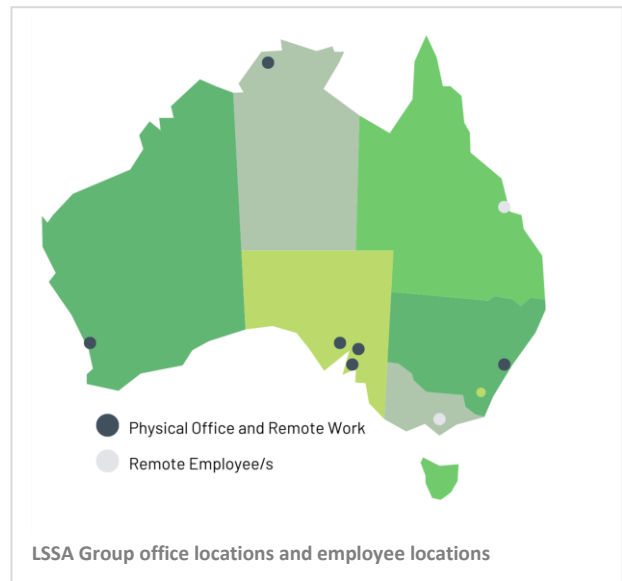
- provision of property data and information including sales information, ownership information, property valuation details, building information and full disclosure on any easements or encumbrance;
- provision of custom data solutions;
- registration of property transactions;
- processing of land divisions;
- property valuations in support of the South Australian Office of the Valuer-General; and
- ICT software development and consultancy services through our controlled entity Relational Data Systems Pty Ltd (**RDS**) which we acquired in January 2020.

In February 2024, LSSA completed its acquisition of the Sum Insured business, a provider of a home contents calculator to the insurance industry in Australia and New Zealand. LSSA trades under the business names “Land Services SA”, and “Sum Insured”, and RDS trades as its own entity. The logos of these three brands are below.



As at 30 June 2024, LSSA had 228 employees. LSSA’s ICT division, comprising of ICT support and development is our largest division with more than 130 employees within the LSSA Group.

Our LSSA employees work across Australia, with the majority of employees based out of our Registered Office. LSSA Group offices and where our employees are based is displayed on the map below.



LSSA’s diverse business is highlighted through the varying roles that our employees undertake within our operations. These include Java Analyst, Software Engineer, Business Analyst within our ICT division, Valuer and Senior Valuer within our Valuations division, Property Examiner and Division Officer within our Land Titling team and within the Commercial division we have roles such as Product Owner and Product Manager, and Marketing Manager.

LSSA recognises that our largest division, ICT, operates in a typically male dominated environment. However, LSSA 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 LSSA’s business, please refer to our website at: www.landservices.com.au.

Our Supply Chain

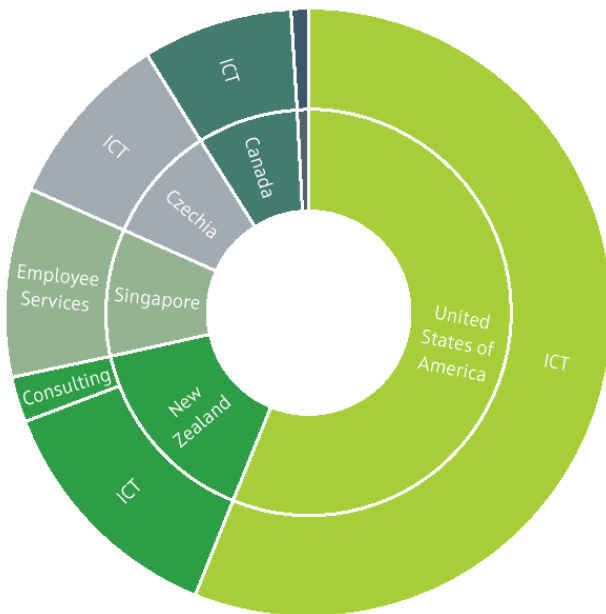
Given LSSA’s primary operations relate to the operation of a land registry system, supporting the Office of the Valuer-General in the valuation of properties within South Australia, and ICT consultancy work, our cost base is primarily comprised of people related costs and ICT expenses. LSSA is a moderate purchaser of goods and services required for our business ranging from single occasion purchases to longstanding contractual relationships. In the Reporting Period, the LSSA Group had a total annual spend of approximately **\$17,000,000** on goods and services procured from approximately **700** 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 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 LSSA 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.

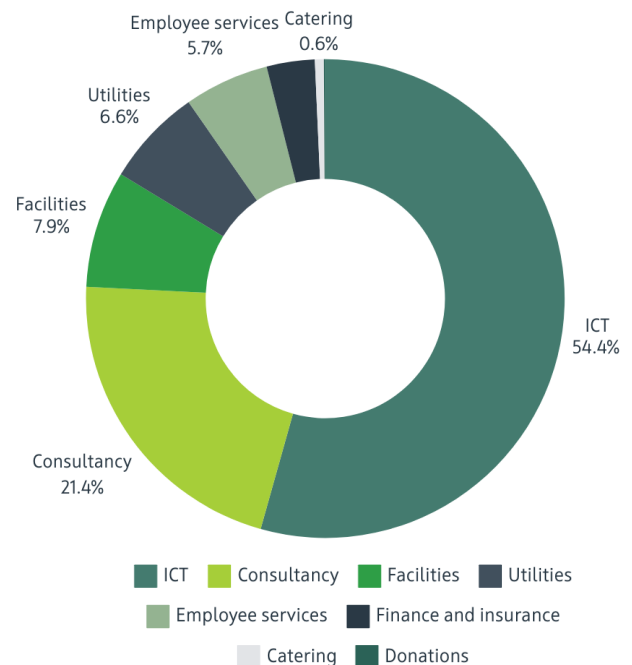
During the Reporting Period those vendors and suppliers located overseas comprised approximately **1.5%** of all third-party vendor spend representing a decrease from the previous period.

Country	Percentage of Spend	Estimated prevalence of Modern Slavery (per 1,000 population) ¹	Estimated number of people in Modern Slavery	Risk Rating ²
Australia	98.43%	1.6	41,000	Low
Canada	0.12%	1.8	69,000	Low
Czechia	0.15%	4.2	45,000	Medium
New Zealand	0.24%	1.6	8,000	Low
Norway	0.01%	0.5	3,000	Low
Singapore	0.16%	2.1	12,000	Low
United States of America	0.87%	3.3	1,091,000	Medium
High Risk Countries ³	0.00%	-		N/A

Overseas Expenditure by Country and Category



Breakdown of spend across supplier categories



¹ Walk Free Foundation, The Global Slavery Index 2023, Appendix 2, Table 26.

² 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).

³ 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.

4. RISKS OF MODERN SLAVERY PRACTICES

LSSA 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.⁴ The United Nations and Walk Free Foundation have estimated that there are approximately 50 million victims of Modern Slavery around the world.⁵ 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

LSSA 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.

LSSA directly employs 228 people, the majority, as noted above, are full-time employees with most employed under individual employment contracts that meet or exceed the minimum legal entitlements in Australia. LSSA proudly recognises that we have a number of employees from diverse backgrounds, and that, in some instances, this could give rise to an increased prevalence of Modern Slavery within our operations. However, all our workforce is based in Australia, with the majority of our employees having some level of higher education. As our employees are based in Australia, with most having some level of higher 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 LSSA we continually aim to create a welcoming and inclusive environment. We have a number of policies, including our Flexible Work Policy, Additional Hours Policy, Reward and Recognition Policy, and Tenure Recognition Policy that collectively work to support our staff to feel empowered and to be their authentic self to speak up. Our

⁴ 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>.

⁵ Ibid.

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**.

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;
- labour hire; and
- catering services.

As our operations are based and occur solely in Australia, and considering the relevant sector and products and services risks to LSSA, we are at comparatively lower risk than other reporting entities within our industry. In addition, having regard to our purchases from medium risk countries (being software licences from USA and Czechia), these countries and goods do not form part of the highest value products at risk of forced labour.⁶

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 LSSA Group to be directly or indirectly linked to Modern Slavery practices. Accordingly, as assessed through the LSSA Group's risk management framework, LSSA 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.

As we increasingly expand and acquire new businesses, including the recent Sum Insured acquisition, we are cognisant that LSSA will need to remain vigilant around the risks of Modern Slavery in newly acquired or expanded business opportunities.

⁶ Walk Free Foundation, The Global Slavery Index 2023, Appendix 3, Table 40.

5. 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).

Corporate Governance Framework

Board

The Board is responsible for setting the strategic direction and risk appetite for the LSSA Group through the Risk Committee and ensuring general oversight and monitoring of the risk culture through Reports provided to the Board and Risk Committee by the Executive.

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.

Executive

LSSA 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 Executive, under the leadership of the Chief Executive Officer, is accountable for:

- monitoring, reviewing, and improving the effectiveness of our approach to risks of Modern Slavery practices within our business; and
- ensuring that there are systems in place so that such risks are appropriately controlled.

The operationalised systems, processes, policies, and procedures adopted by us are discussed further below.

Employees

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 and complete training on the Code of Conduct. All Employees must confirm their commitment to our Code of Conduct and undertake training annually. In FY24, all staff undertook Code of Conduct training.

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.

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:** LSSA’s Code of Conduct reinforces LSSA’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 and was updated in the first half of 2024. In 2023-2024, LSSA expanded our Code of Conduct training with a bespoke interactive module, and a new 10 question Code of Conduct quiz which employees are expected to satisfactorily complete to confirm understanding.

- **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 Diversity and Inclusion Policy and Workplace Discrimination, Harassment and Bullying Policy).
- **Our template agreements:** Our template 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:** LSSA 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:** LSSA is committed to maintaining a safe workplace that values equal opportunity and is free from discrimination, harassment, and victimisation. LSSA 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 Protection Policy.
- **ESG Reporting:** LSSA participates in annual global ESG benchmarking to measure LSSA's performance across all material social, governance and environmental issues including aspects of Modern Slavery.
- **Modern Slavery Training:** In 2024, LSSA implemented a new modern slavery training designed just for LSSA. 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.

LSSA 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 LSSA's 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 LSSA 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 Australia⁷ and is set out on the next page.

⁷ See: https://unglobalcompact.org.au/wp-content/uploads/2021/03/4261-UNGC-Grievance-Mechanisms-GUIDANCE-DOC_28pp-9-FA.pdf

Template Modern Slavery Grievance Mechanism

 LSSA Modern Slavery / Legal Team	 Initiator of Grievance	 Subject matter Experts and other Business Units	 Executive Leadership Team	 Third Party
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

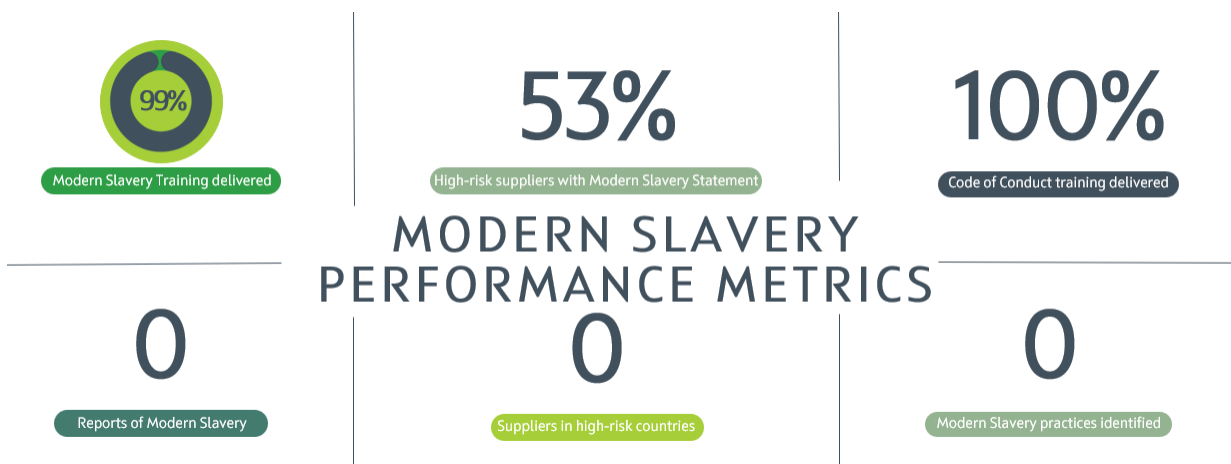
LSSA during the Reporting Period successfully met our committed tasks for 2023-24 and, in some cases, exceeded those tasks. These were in addition to Modern Slavery risks being considered as part of our enterprise risk management framework (including regular review of risks and controls and reporting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



Assessing and reporting on effectiveness

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

During this period over 50% of suppliers, where spend was over \$200,000 per annum, were identified to have had a modern slavery statement. LSSA will continue to evolve how we measure our effectiveness of mitigating Modern Slavery in our supply chains and operations. Even though LSSA has implemented a new Whistleblower page and increased training across the organisation, there were no reports of Modern Slavery across our organisation. LSSA 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 LSSA’s standard reporting of enterprise risks to the LSSA 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 LSSA 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.⁸ 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, LSSA is cognisant that it has led to changes in global supply chains. LSSA is extremely proud of how it and its people responded to the pandemic and post pandemic world, maintaining high quality services for industry. LSSA 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.

6. LOOKING AHEAD

Our Progress

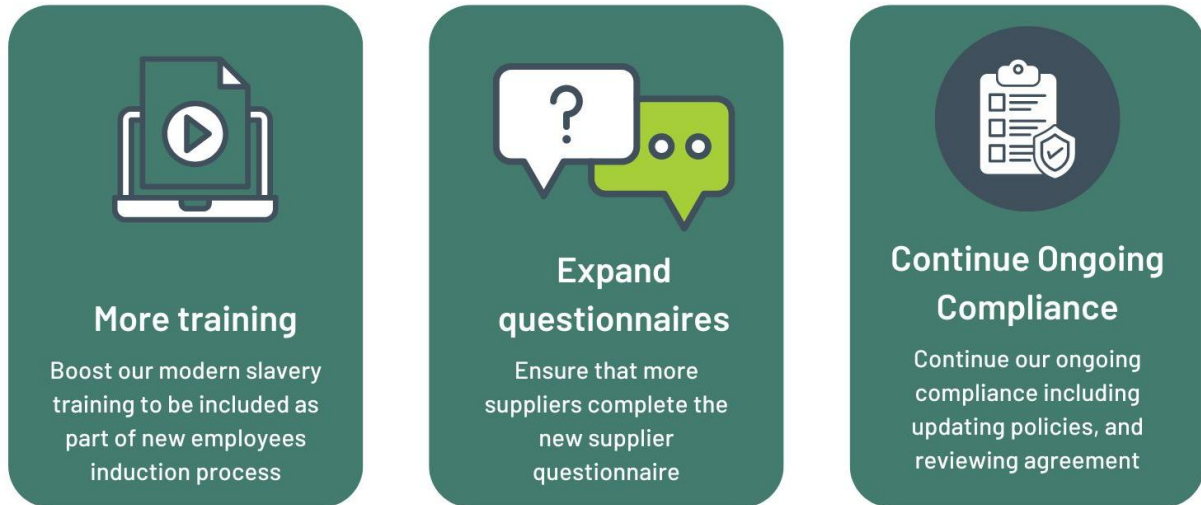
LSSA is committed to mitigating the risk of Modern Slavery in our operations and supply chains. Additionally, we look to continually review, update and enhance our policies and procedures. While we must look ahead, we must also recognise our achievements. In the 2023-24 Modern Slavery Statement, LSSA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



⁸ Walk Free Foundation, The Global Slavery Index 2023, page 2.

Our Future Commitments

LSSA 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.



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
Modern Slavery Training	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.
Questionnaires	Expand the use of Modern Slavery questionnaires to be mandatory for: <ul style="list-style-type: none"> suppliers in high-risk countries; and for suppliers where LSSA has an annual spend of over \$200,000 and who do not have a Modern Slavery statement. 	New	For reporting in FY25 Reporting Period.
Supplier Management	Continue to undertake desktop reviews of our suppliers (in high-risk categories) both current suppliers and when on-boarding. Ensure that the Key Supplier Management Policy is reviewed. Confirm that our contracts with key supplier address modern slavery.	Ongoing	For reporting in FY25 Reporting Period.

Goal	Description	Status	Future Goal
Template Supplier Agreements	Annual review of our template procurement and supplier agreements and where necessary enhance terms (including, where relevant from a risk perspective, require suppliers to maintain records in relation to their supply chains and provide any information relating to any developed supplier questionnaires so that we are comforted that there are no Modern Slavery practices present in their business or supply chain).	Ongoing	For reporting in FY25 Reporting Period.
Policies and Procedures	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.
ESG Benchmarking	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.
Modern Slavery Complaints	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.

7. 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 LSSA Group is a closely held group with a common Board of Directors and officers appointed to Land Services SA. Each controlled entity within the LSSA Group operates under the direction and governance of LSSA and all share the same executive management. Each LSSA Group entity has the same Company Secretary.
- LSSA 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 LSSA Executive Risk Working Group.
- Each entity within the LSSA Group is covered by LSSA's policies, procedures, and systems, including those relating to contracting, purchasing and human resources.
- Our Board, Executive and senior leadership team 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, LSSA consulted across the LSSA 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 LSSA Group has reviewed this Modern Slavery Statement as part of our consultation process.

Accordingly, all entities within the LSSA 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.



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Empowering South Australia's Property Industry



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		LSSA 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 SA Holding Pty Ltd ACN 618 228 096, as trustee for the Land Services SA Holding Trust (ABN 14 477 089 305)

Land Services SA Operating Pty Ltd ACN 618 229 815, as trustee for the Land Services SA Operating Trust (ABN 86 836 650 939)

Other Entities (Non-reporting):

Land Services SA Employee Pty Ltd ACN 618 252 538

Land Services SA Employee 2 Pty Ltd ACN 618 252 592

Autumn Finance Company Pty Limited ACN 616 548 031

Relational Data Systems Pty Ltd ACN 114 514 037