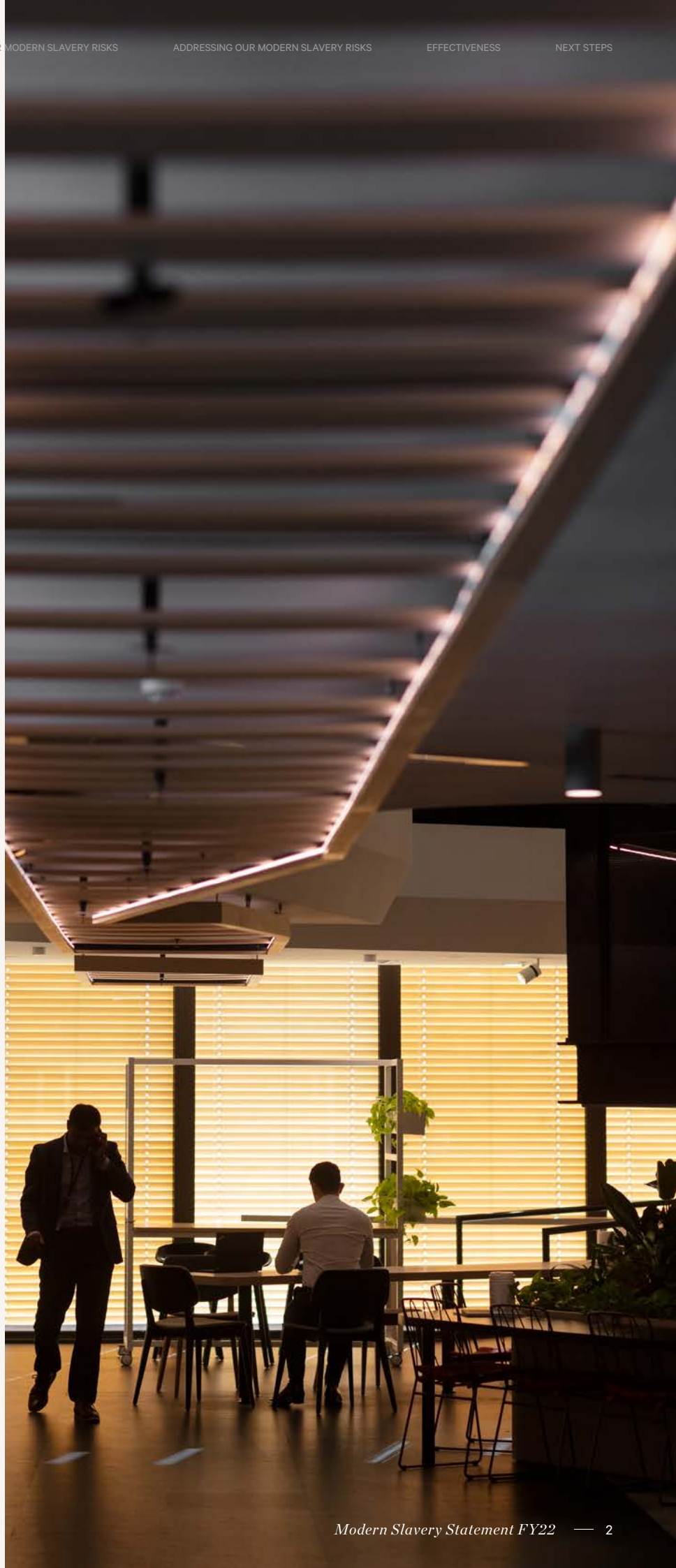




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### ACKNOWLEDGEMENT OF COUNTRY

LAT acknowledges Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of the lands and waters of Australia. We recognise that we all live, work and play on the traditional lands of Aboriginal and Torres Strait Islander peoples and we pay our respects to Elders past and present.

Artwork created by Riki Salam  
(Mualgal, Kaurareg, Kuku Yalanji) of We are 27 Creative.

## ABOUT THIS STATEMENT

This is a statement to cover The Trust Company (Australia) Limited ABN 21 000 000 993 as trustee for Leader Auta I Trust (ABN 40 115 425 906) (LATI). The Trust Company Limited as Trustee for Leader Auta II Trust (ABN 60 834 163 237) and other entities over which LATI has control for accounting purposes for the year ending 30 June 2022 (FY22) (together for the report, references to 'LAT', 'Group', 'we', 'us' and 'our' refer to LATI and its controlled entities as a whole). LATI is a sub-trust that is controlled by China Investment Corporation. This Modern Slavery Statement has been published in accordance with the Modern Slavery Act 2018 (Cth) (Act). This is an FY22 Modern Slavery Statement and references in this report to a 'year' relate to the financial year ended 30 June 2022.

This statement has been approved by the board of the Trust Company (Australia) Limited.

**RODNEY GARTH ELLWOOD**

Director 

Date: **22/12/2022**

## CONSULTATION TO PREPARE THE STATEMENT

This statement was prepared by the Anti-Slavery Committee (ASC), which includes senior managers from across Office and Industrial, Retail, Residential, Design, Marketing & Sales, Construction and Group functions, including HSE, HR, Risk, Procurement and Sustainability who are tasked with representing their divisions and areas of expertise. When preparing this document, senior managers were required to consult with their relevant business units.

# OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN



## ABOUT LAT

LAT owns office assets in Sydney, Melbourne and Brisbane. LAT’s supply chain relates to property management, property development and investment management of these assets. Mirvac Limited and its related bodies provide these services.

Mirvac has, for 50 years, focused on creating sustainable, connected and vibrant urban environments for people to work, shop, live and play. Mirvac has a workforce of approximately 1,550 employees and operates primarily in Australia’s four key cities of Sydney, Melbourne, Brisbane and Perth. Mirvac will also publish its FY22 Modern Slavery statement.

Mirvac’s key activities consist of construction, development, investment management, funds management and asset – project management. Mirvac own and manage assets across the office, industrial, retail and build to rent sectors.

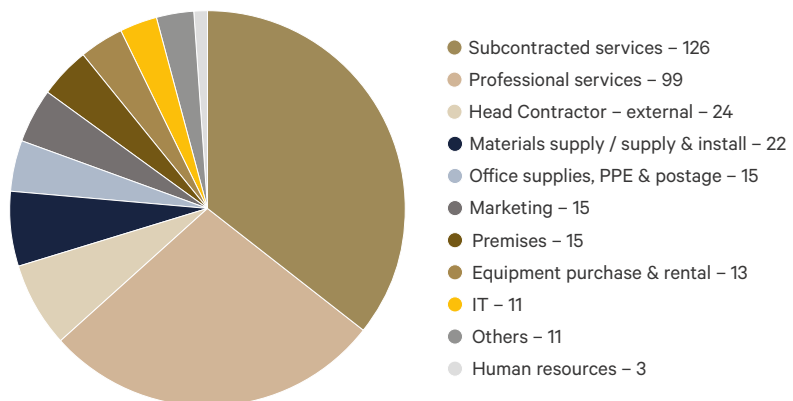
## OUR SUPPLY CHAIN

In FY22, LAT’s supply chain consisted of approximately 354 suppliers across development, management and construction.

In FY22, 100 per cent of LAT’s procurement spend was with Australian entities.

LAT recognises that these suppliers may procure materials from outside of Australia, and as such, Mirvac (on behalf of LAT) completed further assessments of the supply chain as described in the Understanding our Modern Slavery Risks section of this statement.

### LAT’S SUPPLY CHAIN – NUMBER OF SUPPLIERS PER CATEGORY



# UNDERSTANDING OUR MODERN SLAVERY RISKS



In this section we will describe how we have developed our understanding of modern slavery risks in our operations and supply chain. We start with our understanding of risks in the property and construction industry and then risks specific to LAT. We outline how we have mapped our risks, including the use of the UNGPs. We then take a closer look at two of our outsourced products and services as well as exploring the area of emerging and evolving risks.

## RISKS IN THE PROPERTY AND CONSTRUCTION INDUSTRY

Globally, the property and construction sectors are considered to be high-risk sectors for modern slavery, due to the risk factors outlined to the right<sup>2</sup>. We acknowledge that this means we may be exposed to a range of modern slavery risks through our operations and supply chain.

The property and construction sectors in Australia are particularly susceptible to these risks given their links to the Asia-Pacific region which the International Labour Organization (ILO) estimates has the greatest number of forced labourers (approximately 11 million), accounting for well over half of the global estimated total<sup>3</sup>.

*We recognise modern slavery as conduct where offenders use coercion, threats or deception to exploit victims and undermine or take away their freedom<sup>1</sup>. It can include human trafficking, slavery, servitude, forced labour, debt bondage, deceptive recruiting for labour or services, forced marriage, and the worst forms of child labour.*



1. This is consistent with the definition of modern slavery used in the Australian Government's Official Guidance about the Modern Slavery Act.

2. Listening and Responding to Modern Slavery in Property and Construction: A Practical Guide for Effective Human Rights Grievance Mechanisms, KPMG and the Property Council of Australia, 2022.

3. Forced Labour in Asia and the Pacific (ilo.org).

# UNDERSTANDING OUR MODERN SLAVERY RISKS CONTINUED

## RISKS IN OUR OPERATIONS

In FY22, the modern slavery risks in Mirvac's direct operations remained comparatively low. Mirvac's (LAT's key service provider) workforce is located in Australia, primarily provides professional, office-based services, and is employed in accordance with Australian workplace law. Mirvac's employees have the right to join a union and 32 per cent of their workforce is covered by an award or is employed under an Enterprise Bargaining Agreement.

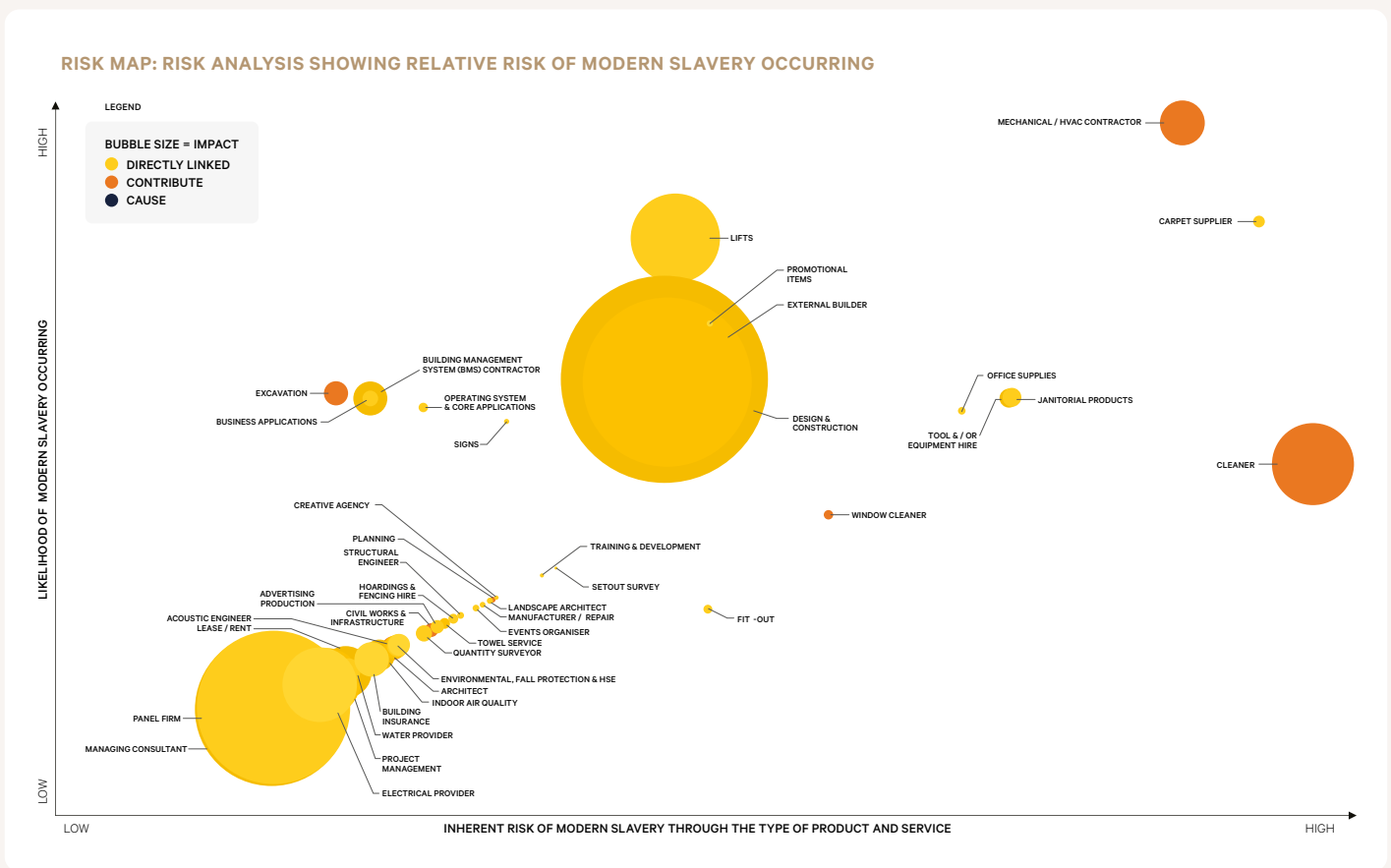
Mirvac have a comprehensive suite of policies that contribute to a safe and fair working environment. Mirvac's policy framework, outlined on page 10, details who the policies apply to, with the majority relevant to all Workplace Participants.<sup>1</sup>

## RISKS IN OUR SUPPLY CHAIN

### FY22 RISK MAPPING

Understanding of our modern slavery risks across our supply chain remains a priority for LAT.

The risk map below summarises potential risks across our activities and spend over FY22. Included in this assessment is information from external sources such as the Social Hotspot Database, and literature evidence. As we cannot address all potential risks at once, the map below helps us to prioritise and create a staged approach. Considerations included are inherent product/service risk, geographical risk, spend and our potential involvement.



1. Workplace Participants are defined as Mirvac employees, directors (both executive and non-executive), contractors, labour hire employees, suppliers, apprentices and work experience students.

## UNDERSTANDING OUR MODERN SLAVERY RISKS CONTINUED

### THE UNGPS ON BUSINESS AND HUMAN RIGHTS

Mirvac's approach to assessing its modern slavery risks is consistent with the UNGPs, the recognised global standard for preventing and addressing business-related human rights harm.

As can be seen from the risk map above, the UNGPs three-part continuum of involvement is included in Mirvac's high-level risk assessment. The continuum outlines how businesses can be involved in adverse human rights impacts, including modern slavery and can guide the risk management response. This continuum will also be leveraged in the approach to remediation.

In line with the UNGPs, Mirvac seeks to understand and prioritise modern slavery risks through the lens of risk to people. Understanding where the greatest risks lie is a continued learning process.

#### CAUSE

A business can cause modern slavery 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 modern slavery 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 maintenance provider in the construction sector could contribute to modern slavery by placing unrealistic cost requirements on a subcontractor, which could likely only be met using exploited labour.

#### DIRECTLY LINKED TO

A business can be directly linked to modern slavery through its products, services or operations by a business relationship, such as a sub-supplier. For example, a security company may purchase uniforms for its employees made by a supplier with textiles produced by a third supplier using modern slavery.

### COLLABORATING TO UNDERSTAND RISKS

Mirvac works collaboratively with industry peers to engage suppliers through the PCA supplier self-assessment platform. Data from these assessments provide an indication of specific supplier risk and offer an opportunity to address high risk areas within their operations. Due to the number of shared suppliers across the property sector, this collaborative approach to risk assessment helps Mirvac to maximise their impact and facilitate a consistent approach across the sector.

More information about Mirvac's continued collaboration with the PCA, and the process by which data from the self-assessments has been verified, is outlined on page 12.

Another way Mirvac have sought to verify the risk map's high level risk assessment is through participation in research conducted by the University of Melbourne. This included interviews with key Mirvac employees involved in the procurement of landscaping services.

Supplier interviews are scheduled for FY23, after which we expect the results of the study to be available. Mirvac will incorporate learnings into how they address modern slavery in these areas.



## UNDERSTANDING OUR MODERN SLAVERY RISKS CONTINUED

### A CLOSER LOOK AT SUPPLY CHAIN RISK

In FY22, Mirvac focused on gaining a deeper understanding of risks across two different areas identified as carrying a greater risk of being directly linked to modern slavery.



**Labour hire in landscaping:** While landscaping for Mirvac's properties occurs in Australia using Australian companies, they may be directly linked to modern slavery through the contractors engaged to provide landscaping services if Mirvac or their subcontractors exploit their workers. Labour hire for landscaping typically uses a high level of unskilled and temporary labour (often recruited through labour hire agencies), which may increase vulnerabilities to modern slavery.

In FY22, Mirvac undertook a tender for landscaping services in their Industrial portfolio, which provided an opportunity to learn more about modern slavery risks in this area. Amongst the suppliers, there was a scale in the maturity of response to modern slavery risk which varied proportionate to the company's size. The larger companies had more resources available to invest in the reduction of risk to people.

By partnering with the University of Melbourne, Better Sydney and the PCA, Mirvac were able to exchange theoretical and practical examples of assessing and addressing risk, and feed into broader guidelines of effective responses to modern slavery in this space. The learnings from exploring landscaping in the Industrial portfolio will be leveraged for other portfolios.



**Cleaning:** Mirvac's facility management teams procure cleaning services for our properties. Sub-contracted cleaning services in Australia can carry high risks of modern slavery due to the reliance on unskilled, temporary and migrant labour and low barriers to entry. These workers can have a greater vulnerability to exploitation and sub-contracting arrangements in the cleaning sector can also limit visibility over working conditions.

Mirvac recognise that they could be directly linked to modern slavery in this area if suppliers or sub-contractors exploited their workers on our sites. Due to the nature of Mirvac's engagement with cleaners, which can include managing their activities on sites, they could potentially also contribute to modern slavery in this area if their engagement with these workers incentivised or facilitated modern slavery.

In FY22, Mirvac carried out a review of their cleaning contractors with a view to extend contracts until FY23 when a tender will be conducted. Effective due diligence measures were in place, however, Mirvac saw an opportunity to enhance awareness of modern slavery amongst Mirvac employees, particularly around worker engagement. For further information on Mirvac's efforts to address these risks in FY22, see page 13.

### EMERGING AND EVOLVING RISKS

We understand that our modern slavery risk profile is dynamic due to a range of internal and external factors.

FY22 saw significant global developments that have demonstrated the evolving nature of modern slavery risks and the importance of integrating respect for human rights into procurement activities. For example, the unfolding humanitarian crisis in Ukraine has presented a number of human rights concerns, including potentially exacerbating vulnerabilities of local populations to modern slavery. While we have not identified any supply chain links to Russia or Ukraine, this situation is a reminder of how structural factors can impact businesses' modern slavery risk profiles.

During the reporting period, COVID-19 continued to increase the vulnerability of workers to modern slavery and limited the ability to monitor our suppliers' modern slavery risk management. As the economic pressures on suppliers carry into 2022 and beyond, we continue to be mindful of the impacts of the pandemic on our modern slavery risks and take appropriate action to manage these risks as required.

We are aware of the ongoing concern of state-sponsored forced labour camps. In response to this Mirvac are working with the PCA and experts from Anti-Slavery Australia, the Australian Human Rights Institute and UNSW, Monash Business School, the Clean Energy Council, the University of Nottingham, and leading private sector organisations.





# ADDRESSING OUR MODERN SLAVERY RISKS

This section will look to how Mirvac are addressing the potential risk of modern slavery in their operations and supply chain. Below we have outlined the evolution of Mirvac’s Strategy and its six pillars. In the following pages we will talk to action undertaken in FY22 relevant to each of the six pillars in detail.

## OUR ACTIONS TO ADDRESS OUR MODERN SLAVERY RISKS

### STRATEGY DEVELOPMENT

In FY22 Mirvac embarked on an extensive process to develop the Strategy with the aim to be ‘a force for good in supply chain transparency and workers rights’. The creation of the Strategy enabled Mirvac to identify opportunities to improve their approach, key strengths that they can share with industry partners, and areas for collaboration.

The Strategy: A force for good in supply chain transparency and workers rights.

The Pillars: Mirvac will monitor, measure and report against the six pillars detailed below.



**Governance:** to ensure that the systems, processes, policies and strategies are in place to enable Mirvac’s modern slavery response, including oversight and monitoring by the cross-functional ASC.



**Capability and Awareness:** to raise awareness of modern slavery and to help equip employees with the relevant knowledge to identify and manage the risks of modern slavery related to the work that they do.



**Risk Assessment and Supply Chain Risk Management:** to further identify and understand Mirvac’s risks, have meaningful engagement with suppliers, and implement appropriate due diligence processes.



**Grievance and Remediation Management:** to seek to ensure that Mirvac’s grievance mechanisms and incident management processes are able to effectively address modern slavery related incidents or allegations and facilitate remediation where required.



**Operational Risk Management:** to further identify and understand risks within Mirvac’s operations, separate to their supply chains, and implement appropriate due diligence processes to manage these risks.



**Collaboration:** to further identify and leverage opportunities to collaborate with suppliers, external stakeholders and industry peers to strengthen Mirvac’s modern slavery risk management response.

## GOVERNANCE

Mirvac’s response to modern slavery is championed from the top down and seeks to leverage expertise across the business through a cross-functional approach.

### ANTI-SLAVERY COMMITTEE (ASC)

In 2019, Mirvac established a cross-functional ASC to oversee modern slavery risk management activities in the Group’s operations and its supply chain.

To help ensure Mirvac’s response to modern slavery is inclusive and comprehensive, members have been selected to represent their divisions, as well as provide subject matter expertise in their field.

In FY22, Mirvac formalised the ASC’s Charter to better clarify its role, purpose and responsibilities:

#### PURPOSE

- > Govern and lead all anti-slavery activities in the Group’s operations and supply chain.

#### OBJECTIVES

- > Oversees the implementation of Strategy
- > Deliver Mirvac’s annual Modern Slavery Statement
- > Advise ELT and Board on Modern Slavery risks and response
- > Provide oversight of relevant risk and incident management including grievance mechanisms and remediation.

#### RESPONSIBILITIES

- > Internal leadership in the mitigation of modern slavery
- > Drive progress against Strategy goals
- > Understand risks in respective business units

## ADDRESSING OUR MODERN SLAVERY RISKS CONTINUED

### MIRVAC'S POLICY FRAMEWORK

Mirvac have a comprehensive policy framework to support the commitment to respect human rights, including the human right to freedom from modern slavery. Mirvac's policies aim to support a safe and fair working environment, as well as setting clear expectations for their employees and suppliers. The key policies relevant to modern slavery are set out in the table below. In addition to the framework below, Mirvac's Whistleblower Policy is outlined in detail on page 15.

POLICY	RELEVANCE TO MODERN SLAVERY	COMMUNICATION OF POLICY
<b><u>CODE OF CONDUCT</u></b>	Mirvac's Code of Conduct articulates the standards of behaviour that Mirvac expects of all Workplace Participants. Any materially adverse conduct that is inconsistent with their Values, the Code, or desired culture of the Group is reported to the Board. This includes any conduct where human rights violations, including modern slavery, have been identified.	Mirvac's Code of Conduct is published on their website.  Training on the Code of Conduct is completed by all Mirvac employees annually.
<b><u>HUMAN RIGHTS COMMITMENT</u></b>	Mirvac's Human Rights Commitment describes the steps that Mirvac is taking to address human rights risks, such as those relating to modern slavery, across the organisation and global supply chain, and sets out their plans for future improvements.	Mirvac's Human Rights Commitment has been shared with employees and is available on their Intranet and the Group's website.
<b><u>RISK MANAGEMENT POLICY &amp; FRAMEWORK</u></b>	Mirvac's Risk Management Policy & Framework outlines the processes Mirvac have in place for the systematic identification, assessment, management, monitoring and communication of all material risks associated with the Group's business operations. Modern slavery risks are assessed within this framework.	Mirvac's Risk Management Policy & Framework is available on their website.  Regular updates on matters relating to modern slavery are provided to the ASC.
<b><u>GROUP PROCUREMENT POLICY AND GUIDELINES</u></b>	The Group Procurement Policy and Guidelines outline Mirvac's standards for all procurement activity and ensures consistent practices across the Group. Together, the Procurement Policy and Guidelines outline Mirvac's procurement philosophy, in which they support the Ten Principles of the United Nations Global Compact (including ILO relevant responsible sourcing requirements), as well as incorporating the assessment of potential modern slavery risks and the actions taken to assess and address this risk.	The Group Procurement Policy and Guidelines are available on Mirvac's intranet.
<b><u>VENDOR CODE OF CONDUCT</u></b>	Mirvac's Vendor Code of Conduct (VCoC) defines their commitment to, and expectations of, their suppliers and the way they conduct business together. It includes requirements relating to human rights, including modern slavery. It specifically requires their suppliers to comply with relevant labour and employment laws (including developing written labour policies), and to provide a formal complaints management process for their workers, the local communities in which they operate, and workers in their supply chain.	The Vendor Code of Conduct is available on Mirvac's website and Intranet.
<b><u>HEALTH SAFETY ENVIRONMENT POLICY</u></b>	Mirvac's Health Safety Environment Policy sets out the guiding principles and Mirvac's commitment to protect and improve the health, safety and wellbeing of their employees, suppliers and communities and provide healthy, safe and productive places.	Training on Mirvac's Health Safety Environment Policy is completed annually by all Mirvac employees and is available online.
<b><u>RESPONSIBLE INVESTMENT POLICY</u></b>	Mirvac's Responsible Investment Policy takes account of environmental, social and governance risks and opportunities in the investment decision making process, which can include consideration of modern slavery risks.	This is available on Mirvac's intranet.



## ADDRESSING OUR MODERN SLAVERY RISKS CONTINUED

### RISK ASSESSMENT AND SUPPLY CHAIN RISK MANAGEMENT

A key challenge in implementing our response to modern slavery is assessing and addressing risk in our supply chain, including where modern slavery risks may be present in our extended supply chain below our tier one suppliers.

#### DUE DILIGENCE TOOLS

Mirvac's due diligence process includes a range of pre-qualifications checks, contractual arrangements, and ongoing monitoring as appropriate. For example, Mirvac's contracts require suppliers to adopt the Vendor Code of Conduct (VCoC) or have equivalent standards in place and to share these standards with sub-suppliers. Acknowledging that not all suppliers will have their own Whistleblower service, Mirvac's Whistleblower Hotline is available to all suppliers. The VCoC also requires suppliers to not knowingly use modern slavery of any form.

The approach taken is dependent on category of spend, source country and other risk factors. This process can help us to identify potential areas of concern relating to suppliers, which could include issues relating to modern slavery.

Mirvac's aim is to partner where possible with suppliers, however, if necessary, Mirvac can choose not to work, or cease work, with suppliers who do not act to meet these expectations.

Additional due diligence tools include:

	
<b>SUSTAINABILITY QUESTIONNAIRE</b>	<b>PCA SUPPLIER SELF-ASSESSMENT</b>
	
<b>VENDOR DUE DILIGENCE PROCESSES</b>	<b>SANCTIONS CHECKS</b>
	
<b>AUDITS</b>	<b>SITE/FACTORY VISITS</b>
	
<b>TRAINING RESOURCES</b>	<b>CONTRACTS</b>



## ADDRESSING OUR MODERN SLAVERY RISKS CONTINUED

### PCA AND SUPPLIER SELF-ASSESSMENTS

Mirvac continued to leverage opportunities for collaboration on due diligence activities with industry peers through the PCA Modern Slavery Working Group (Working Group). Over the reporting period, the Working Group continued to evolve the PCA online supplier platform that hosts the supplier self-assessment. The self-assessment 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 the Working Group, with the supplier's permission. Each Working Group member determines which suppliers they require to complete the assessment. This enables Mirvac and the Working Group to identify higher risk areas of which we can partner with suppliers on finding ways to mitigate risk.

The group is supported by Better Sydney for subject matter expertise and project management, and the Supply Chain Sustainability School for educational resources. Informed 365

provide the technical expertise on the supplier platform and a follow up service to assist with supplier self-assessment completion.

Verification of responses to the assessment questions is key to the supplier engagement process. A pilot verification process was conducted in FY21 with the assistance of Informed 365 and Bureau Veritas. More than 10 per cent of Mirvac's supplier spend was captured in the pilot verification process, with checks performed on 100 per cent of Mirvac's lift providers, 73 per cent of their cleaners, 71 per cent of their mechanical/HVAC contractors, 42 per cent of their guards/patrols, and 40 per cent of their electricians.

In FY22, the results of this verification process were assessed with the help of Bureau Veritas. The review identified five key risks in Mirvac's supply chain, based on the supplier self-assessments, which related to workers' understanding of their rights and employment conditions, accessibility of adequate grievance mechanisms, and risk management controls for contractors/sub-contractors.

Mirvac will continue to work with the Working Group and Informed 365 to consider how we may strengthen the supplier assessment process, as well as Mirvac's own due diligence processes, to address these risks.

*“With so many shared and international suppliers, multi-year projects and varied levels of knowledge, it makes sense to partner with peers, clients, staff and suppliers to raise awareness, champion grievance mechanisms, fill knowledge gaps, encourage remediation and improve procurement. The shared message is that there is no place for modern slavery in property and construction supply chains; partnership is the new leadership when it comes to continuous improvement.”*

**Robin Mellon**, Project Manager, Property Council of Australia Modern Slavery Working Group & Supplier Platform

From the supplier spend represented on the platform, we have gained the following insights.

# 96%

of suppliers understand the basic facts around modern slavery, with a general awareness of where it may exist in Australian and international supply chain<sup>1</sup>.

# 90%

of Mirvac suppliers do not manufacture products overseas or maintain foreign operations that contribute to their delivery<sup>1</sup>.

# 45%

of Mirvac suppliers source manufactured products or services from overseas that contribute to their delivery<sup>1</sup>.

# 62%

of Mirvac suppliers have done some assessment of modern slavery risks in their operations and supply chain or plan to in the next twelve months.<sup>1</sup>

# 77%

of Mirvac's supplier organisations have a grievance mechanism or process in place (or plan to in the next twelve months) that provides an opportunity for employees, suppliers and the worker voice to be heard.<sup>1</sup>

# 69%

of Mirvac suppliers provide training to employees or suppliers around the topic of human rights and modern slavery or plan to in the next twelve months<sup>1</sup>

Data below obtained through Givvable:

# 23%

of supplier spend in FY22 was with suppliers who have submitted a Modern Slavery Statement.<sup>2</sup>

Mirvac have been incorporating this data into their approach to supplier engagement.

1. PCA Supplier self-assessment.
2. Givvable, based on 100 per cent of suppliers

## ADDRESSING OUR MODERN SLAVERY RISKS CONTINUED

### CASE STUDY:

#### BOLSTERING MODERN SLAVERY DUE DILIGENCE IN CLEANING AND LANDSCAPING TENDERS

In FY22, Mirvac extended cleaning contracts at 20 Mirvac properties and undertook a tender for landscaping maintenance across 10 industrial sites in Sydney. Specific questions on modern slavery were added as part of the tender documentation. This included questions relating to any processes the suppliers had in place to understand, assess and mitigate modern slavery risks, any mechanisms through which the voice of the worker can be heard anonymously (for example through Whistleblower hotlines) and whether the organisation outsourced any labour hire arrangements.

Shortlisted suppliers were asked to complete the PCA supplier self-assessment, including providing an annual update and agreeing to a continuous improvement plan. Suppliers were also asked to provide evidence of their responses to selected questions. Additions were also made to the contract where appropriate such as permitting Mirvac the right to conduct management and employee interviews, as well as statutory and social audits.

Although the due diligence carried out in this instance was not directly related to LAT buildings, the learnings will be transferred at the appropriate time.

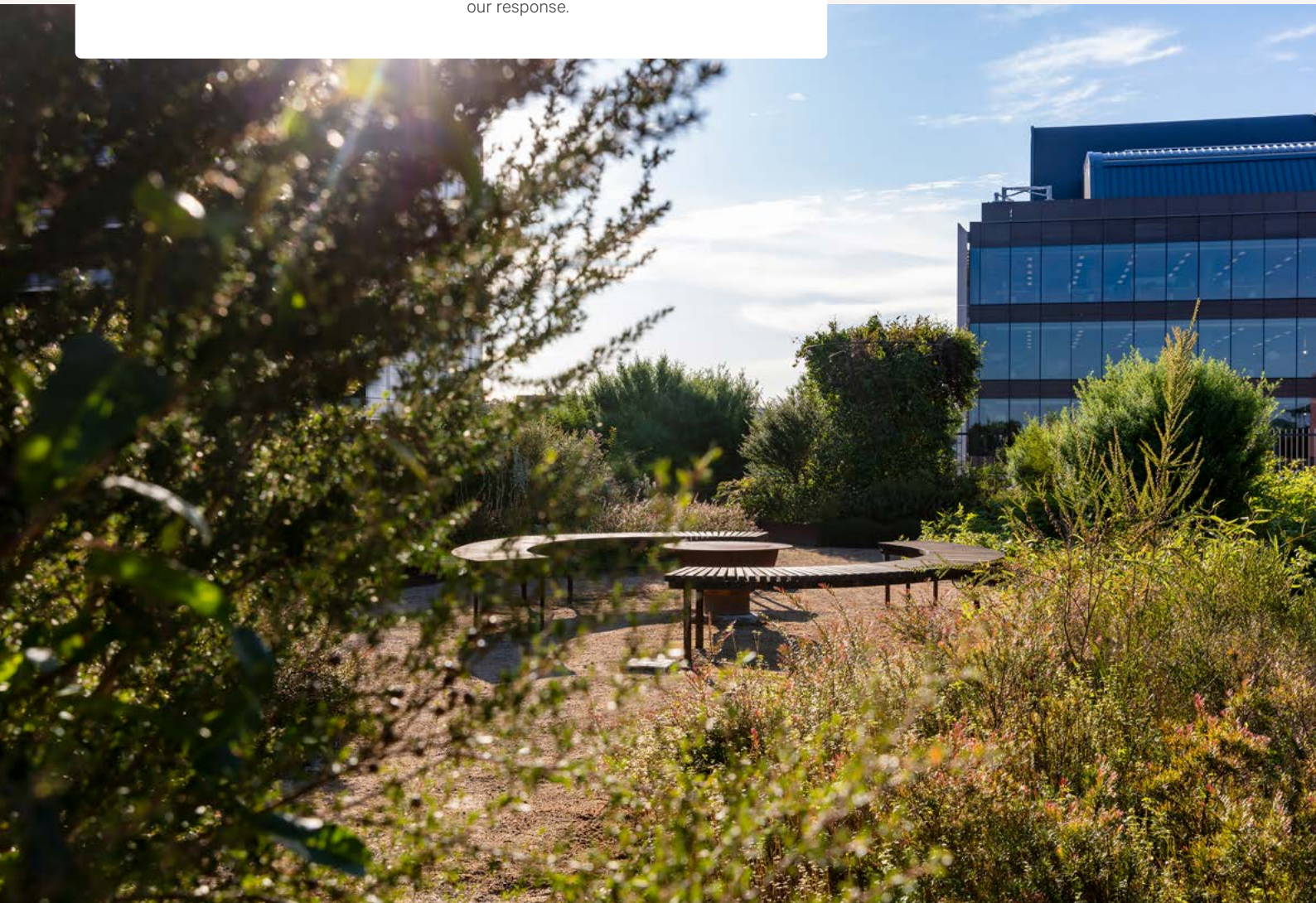
Mirvac will continue to keep an open dialogue with the Cleaning Accountability Framework (CAF), noting that worker engagement and consultation is a keystone of their model and an area where we may be able to expand our response.

### OPERATIONAL RISK MANAGEMENT

Mirvac recognise that there may also be modern slavery risks in their operations, although risks are considered to be comparatively low.

In FY22, Mirvac's recruitment team expanded from two to five employees so that they could bring the majority of their recruitment in-house and reduce the need for labour hire through recruitment agencies. This allows Mirvac to have a standardised approach to recruitment, which ensures Mirvac values are embedded in the process and provides greater protection for the people hired.

Mirvac are taking initial steps to address modern slavery risks with their tenants and joint venture partners.



## ADDRESSING OUR MODERN SLAVERY RISKS CONTINUED

### CAPABILITY AND AWARENESS

Mirvac have focused on raising awareness along with specific functional training for roles identified with a higher likelihood of encountering modern slavery.

#### TRAINING FOR TECHNICAL OPERATIONS MANAGEMENT TEAM

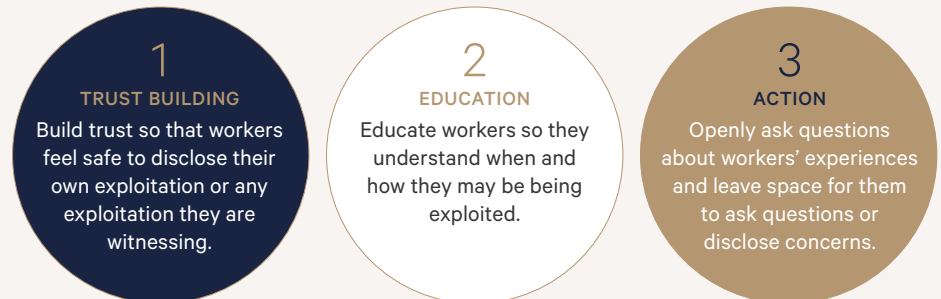
The level of potential exposure to modern slavery risks varies throughout Mirvac's business activities. Employees responsible for the management of our tenancies were identified as a key cohort for targeted training on modern slavery during the reporting period.

Mirvac worked with the United Workers Union to provide training on best practice in managing modern slavery risks in the cleaning and security sectors through effective worker engagement. Training included real case studies of exploitation in Australia, which resonated with employees and highlighted the importance of continuing to make this topic tangible, and outlined the roles that various actors can play in the exploitation of workers in the cleaning and security sector. The training also equipped participants with an overview of a Worker Engagement Framework to help build trust and educate workers on their rights.

Feedback from participants also highlighted that even where members of the Technical Operations Management Team have good relationships with the cleaners onsite, the power dynamics and other vulnerabilities of these workers can still mean they feel unable to report concerns.

This training was a pilot and Mirvac plans to expand delivery to facility managers and employees responsible for labour hire in FY23. Mirvac assessed the effectiveness of this training through a survey, with all participants agreeing with the statement: 'The training provided a better understanding of modern slavery'.

#### KEY STEPS OF THE WORKER ENGAGEMENT FRAMEWORK



#### TARGETED TRAINING FOR PROCUREMENT

Mirvac also provided training for procurement employees providing participants with an understanding of what modern slavery is and what modern slavery risks might look like in Mirvac's supply chains. This included information on high-risk areas like cleaning, security, labour hire, catering, and building materials. The training also provided information on how procurement practices can affect our modern slavery risks and practical steps procurement team members can take to help manage these risks.

#### TRAINING FOR ANTI-SLAVERY COMMITTEE

The ASC undertook further training on modern slavery in collaboration with Better Sydney to ensure a common understanding, noting new members had joined the ASC in FY22. Feedback indicated a significant increase in participants' understanding of modern slavery, what these risks look like in Mirvac's operations and supply chain, and how to mitigate these risks.

#### ALL-EMPLOYEE TRAINING AND AWARENESS

Mirvac developed a group-wide training module which covered topics such as what modern slavery is, how modern slavery is relevant to Mirvac's business activities, and how to report any suspected modern slavery incidents. It included a short video from the Supply Chain Sustainability School to highlight modern slavery risks in the construction sector specifically. The training was reviewed by an external party. Mirvac incorporated it into their mandatory training suite allowed them to monitor completion rates and assess impact.



# ADDRESSING OUR MODERN SLAVERY RISKS CONTINUED

## GRIEVANCE AND REMEDIATION MANAGEMENT

We understand the importance of having processes in place to identify and, where appropriate, remediate or cooperate in the remediation of modern slavery incidents which we identify we have caused or contributed to through our own activities or business relationships. We also understand we may play a role in remediation where we identify we are directly linked to modern slavery in line with the UNGPs.

Grievance mechanisms play a vital role in enabling the identification and remediation of potential modern slavery and other human rights-related issues.

Over the course of FY22, an ASC sub-group began reviewing whether Mirvac's existing grievance mechanisms were suitable in the modern slavery context. Their initial review concluded that Mirvac's existing Whistleblower program should be leveraged to address modern slavery. Mirvac reached out to their third-party provider of the Whistleblower service to confirm employees were trained in the management of calls relating to modern slavery. The decision to leverage the Whistleblower program was then communicated to all employees through Mirvac's mandatory all-employee training on modern slavery. This was supported by a training module for all employees that outlines how Mirvac's Whistleblower protection regime works and how disclosures can be made within Mirvac.

## MIRVAC'S WHISTLEBLOWER PROGRAM

Mirvac's Audit, Risk and Compliance Committee (ARCC) is responsible for overseeing the policy. An outline of how the Whistleblower program operates in practice is below. Of the three disclosures received, no disclosures relating to modern slavery were made through the Whistleblower Hotline in FY22. The overall effectiveness of the Whistleblower Policy and related programs is assessed every two years.

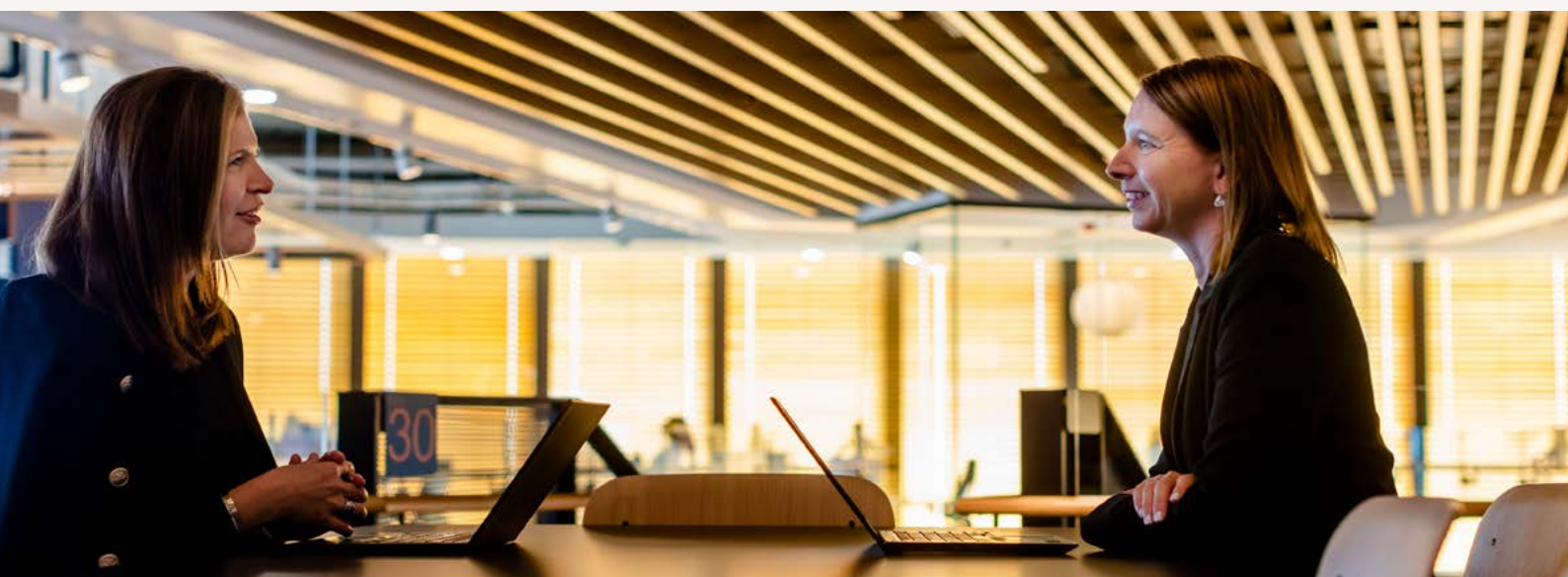


## COLLABORATING ON REMEDIATION

Different or a variety of grievance mechanisms may be required depending on the specifics of the environment. To better understand our development opportunities and inform future action, collaboration was and will continue to be vital.

In FY22, Mirvac attended the United Nations Global Compact Network Australia (UN GCNA) Modern Slavery Community of Practice workshop on remediation. This workshop explored some key elements of effective grievance mechanisms and had open dialogue on how Mirvac can collaborate with non-government and civil society partners. As previously mentioned in FY22, Mirvac also contributed to the development of a practical guide for effective human rights grievances mechanisms in the property and construction sector.

The guide, *Listening and Responding to Modern Slavery in Property and Construction*, was led by the PCA and KPMG, and aims to provide practical tools and advice for businesses to effectively listen and respond to modern slavery using human rights grievance mechanisms. It outlines what modern slavery looks like in the property and construction sector, and includes case studies. Importantly, it incorporates the eight effectiveness criteria in the UNGPs. The PCA is planning the development of another practical guide on remediation in FY23.



# ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

## ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

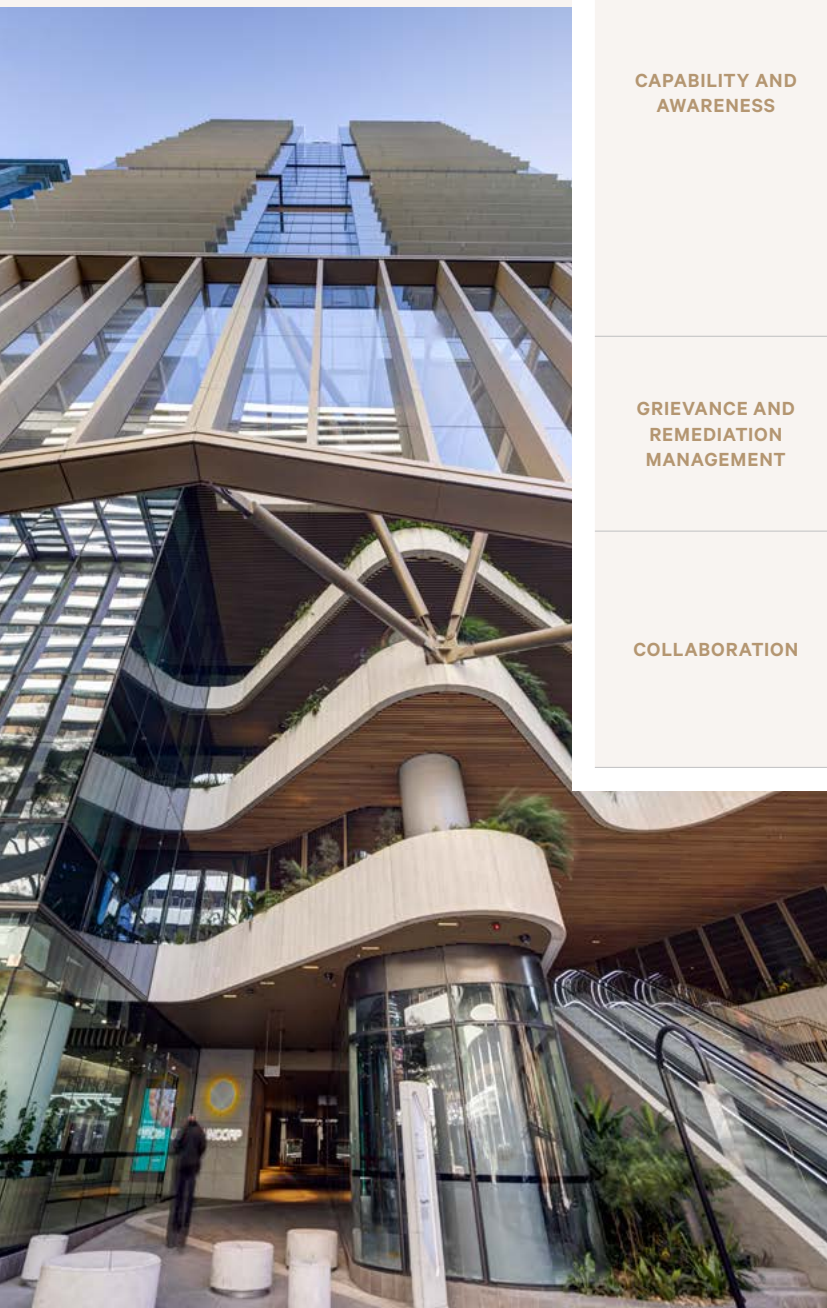
Mirvac assessed the effectiveness of their actions through a variety of means:

- > measurement against KPIs;
- > measurement of training effectiveness through surveys;
- > continuation of Mirvac's response to the modern slavery internal audit;
- > verification of data from the supplier self-assessment by Bureau Veritas; and
- > feedback from experts.

Assessing effectiveness is complex and Mirvac are continuing to explore opportunities to strengthen their approach. The KPIs on the right reflect data that Mirvac have captured in FY22, although no formal target existed. In FY23 Mirvac will determine the KPI's that will best allow us to drive and measure progress against the Strategy.

### KEY PERFORMANCE INDICATORS

AREA	KPI
GOVERNANCE	Members' attendance at the ASC, which helps to show that ASC members are actively engaged in this forum.
	Number of ASC meetings held, which helps to show that the ASC is proactively managing Mirvac's response, which helps Mirvac to verify that employees governing their response are appropriately informed.
RISK ASSESSMENT AND SUPPLY CHAIN RISK MANAGEMENT	Number of category deep-dives carried out, which helps Mirvac to verify their understanding of modern slavery risks below Tier 1.
	Number of suppliers assessed for modern slavery risk through the PCA supplier self-assessment, which helps Mirvac understand whether their risk assessments accurately reflect the risk profile.
OPERATIONAL RISK MANAGEMENT	No quantitative data was gathered in the area of Operational Risk Management.
	Number of employees completing general awareness modern slavery training, which helps Mirvac track internal awareness levels of modern slavery.
CAPABILITY AND AWARENESS	Number of procurement employees completing procurement specific modern slavery training, which helps Mirvac track internal awareness levels of modern slavery within the procurement function.
	Number of ASC members completing bespoke ASC modern slavery training, this ensures those governing Mirvac's approach are appropriately informed.
	Number of Technical Operations Management Team trained on modern slavery through pilot training, which helps Mirvac track internal awareness levels of modern slavery within this function.
	Number of employees reporting improved understanding of modern slavery from the ASC post training.
GRIEVANCE AND REMEDIATION MANAGEMENT	Number of forums attended relating to grievance mechanisms and remediation, which helps us to identify good practice and opportunities to further enhance our response.
	Number of allegations or cases received through our grievance mechanism, which helps Mirvac understand how the mechanism is being used.
COLLABORATION	Number of Working Group meetings attended.
	Number of collaborators/partners engaged including NGO's, experts and businesses, which helps Mirvac to track their external collaboration and engagement.
	Number of UNGC Modern Slavery Working Group workshops attended, which helps Mirvac understand peer and good practice and opportunities to further refine our own response.





## ASSESSING THE EFFECTIVENESS OF OUR ACTIONS CONTINUED



### CASE STUDY:

#### ASSESSING THE EFFECTIVENESS OF MIRVAC'S TRAINING

Mirvac provided ASC members with additional training on modern slavery as noted on page 8. To assess the impact of the training Mirvac conducted surveys of participants before and after the training.

These surveys asked participants to rate their understanding of:

- > Modern slavery generally;
- > The risks of modern slavery within Mirvac's operations and supply chains;
- > How to mitigate modern slavery in our operations and supply chains; and
- > Their individual role in mitigating modern slavery risks.

Participants were asked to rate their understanding of these issues on a scale of 1-5 (with 5 being excellent). Across the five categories, Mirvac saw the biggest improvement in understanding of the part the ASC can play in mitigating modern slavery in our operations and supply chain. However, the surveys identified that further training could be provided to assist ASC members to understand the risks specific to Mirvac's operations and supply chains.

#### SEEKING EXPERT EXTERNAL FEEDBACK ON OUR MODERN SLAVERY RESPONSE

Mirvac actively seek external feedback and input on their modern slavery strategy and response. Mirvac participated in a Modern Slavery Statements Feedback Session organised by the PCA, where subject matter experts analysed the most recent Modern Slavery Statements of 15 leading participant organisations from across the property and construction sectors, and offered insights on the strengths and weaknesses of these approaches, as well as gaps and opportunities for improvement. This session provided Mirvac with valuable external feedback on how their response measures up against their peers, as well as assisting us to identify areas where we can improve. For example, over FY22 Mirvac focused on more critically analysing modern slavery risks through the deep dives outlined on page 8.

Mirvac reviewed the findings of separate analyses of modern slavery statements undertaken by the Australian Council of Superannuation Investors (ACSI Report) and the Monash Centre for Financial Studies (Monash Report). These reports were extremely beneficial, as they provided a framework to compare Mirvac's response to.

Mirvac also sought feedback on their response through the Domus 8.7 Index, a research and benchmarking partnership between the Australian Catholic Anti-Slavery Network, the Australian Catholic University and Macquarie University. The Domus 8.7 Index reviewed over 1,800 Modern Slavery Statements on the Government's Online Register of Modern Slavery Statements to benchmark modern slavery responses. The feedback spoke to limited details in describing actual actions beyond policy development and risk assessment, and very vague action plans for moving forward.

Mirvac will incorporate this feedback into their approach going forward; with progress made in this statement with more information on FY22 actions and future strategy.

#### WHAT WAS DELIVERED AGAINST AUDIT RECOMMENDATIONS

- > Refreshed the ASC Charter
- > Refreshed Strategy
- > Improved grievance mechanisms, including collaboration with PCA
- > Rolled out all-employee mandatory training and bespoke training for select groups
- > Built knowledge of NGOs and other experts in the space
- > Improved approach to supply chain due diligence.

## NEXT STEPS

In FY22, Mirvac focused on building capability and setting foundations. In FY23, Mirvac will look to build on and further integrate their response in line with the six pillars of their modern slavery response, as set out in their Strategy. Mirvac's Strategy also sets out Mirvac's actions over the next three years in three key phases:



### GOVERNANCE

One of the ASC's key focus areas over FY23 will be to implement the Strategy in line with emerging risks and developments and assign clear accountability through measurable KPI's.

### RISK ASSESSMENT AND SUPPLY CHAIN RISK MANAGEMENT

Mirvac will undertake a supply chain segmentation and prioritisation process over FY23 to better understand modern slavery risks across their supply chain. This process will also enable them to prioritise their response to the risks of greatest harm to the victim, in line with the UNGPs.

Mirvac will continue to expand their current supplier engagement to focus on a partnership approach. Over FY23, Mirvac will look to increase supplier awareness and engagement amongst their highest-risk suppliers.

Mirvac will continue to integrate modern slavery and human rights into supplier due diligence processes and supplier agreements, applying learnings from previous activities as appropriate.

### OPERATIONAL RISK MANAGEMENT

Mirvac will continue to educate themselves on relevant operational risks over FY23 and look for ways to better manage these risks.

### CAPABILITY AND AWARENESS

Over FY23 Mirvac will continue to develop their internal training strategy to enhance general awareness across Mirvac, and roll out further modern slavery supply chain risk management training to key functional areas.

### GRIEVANCE AND REMEDIATION MANAGEMENT

Mirvac will work to understand the most effective means of implementing recommendations provided in the PCA's practical guide on grievance mechanisms.

### COLLABORATION

Collaboration underpins Mirvac's approach and they will continue to proactively participate in collaborative forums including the PCA. Mirvac recognise that managing modern slavery risk is not a solo journey and will look to work more collaboratively with their suppliers to better understand their risks and build the capability of their suppliers to address them.

