



**MODERN SLAVERY STATEMENT
FOR YEAR ENDING 31 DECEMBER 2025**

MODERN SLAVERY STATEMENT

ENTITY: Land Bank of Taiwan Co., Ltd.
LEGISLATION: *Modern Slavery Act 2018 (Cth)*
CLASSIFICATION: Reporting Entity
REPORTING PERIOD: 1 January 2025 – 31 December 2025

This Modern Slavery Statement has been prepared by the Land Bank of Taiwan Co., Ltd. Brisbane Branch (**the Branch**) (ARBN 664 630 497) in accordance with the *Modern Slavery Act 2018 (Cth)* (**the Act**), and covers the reporting period from 1 January 2025 to 31 December 2025.

This statement is structured to address the seven(7) mandatory criteria set forth under the Act. It has been formally approved by the Senior Officer Outside Australia (**SOOA**), who exercises delegated authority from the Land Bank of Taiwan's Board of Directors, in accordance with APRA's *Prudential Standard CPS 510 Governance*, to oversee the Australian Branch. Operating in this capacity, the SOOA serves as the principal governing body responsible for the endorsement of this statement.


Wang-Ping Shih

Senior Officer Outside of Australia

Date: 2026.3.13

1 IDENTIFICATION OF REPORTING ENTITY

This Modern Slavery Statement is made by Land Bank of Taiwan Co., Ltd. (ARBN 664 630 497) (**the Branch**), an Australia branch of the Land Bank of Taiwan (**LBOT, the Bank**) incorporated in Taiwan, for the reporting period ending 31 December 2025.

The Branch is a “reporting entity” for the purposes of the *Modern Slavery Act 2018 (Cth)* (**the Act**) because it:

- carries on business in Australia through its physical premise in Brisbane (i.e., Brisbane Branch) at:

Suite A, Level 7, 300 George Street, Brisbane, QLD 4000

- has a consolidated revenue of at least AUD 100 million for the reporting period.

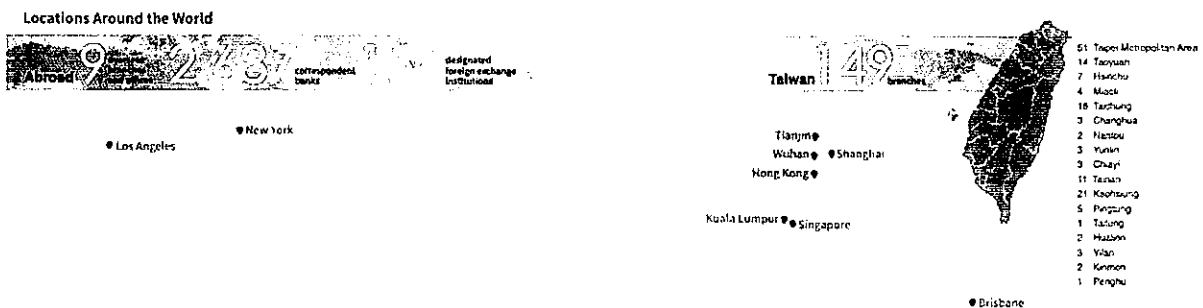
This statement sets out the actions taken by the Branch, specifically in relation to the Australian operations and supply chains, to identify, assess, and address modern slavery risks. Where applicable, it also references the group policies and frameworks that apply to the Branch’s operations.

2 STRUCTURE, OPERATIONS & SUPPLY CHAINS

2.1 Structure and Operations

LBOT is a 100% state-owned financial institution established in 1945 and wholly owned by the Taiwan Ministry of Finance (MOF). Specialising in real estate finance and agricultural development, the Bank plays a pivotal role in Taiwan’s socio-economic landscape.

The Bank’s global footprint is supported by an extensive domestic network of over 100 branches and international operations across 9 overseas locations, including Mainland China, Hong Kong, Malaysia, Singapore, the United States, and Australia (Brisbane Branch)¹.



Picture 1: LBOT locations around the world, 2024 Sustainability Report

In early-2025, the Branch was granted the authority to carry on banking business in Australia as a foreign Authorised Deposit-taking Institution (ADI) by the Australian Prudential Regulation Authority (APRA), and subsequently holds an Australian Financial Services Licence (AFSL) issued by the Australian Securities and Investments Commission (ASIC), authorising it to provide financial services exclusively to wholesale clients.

¹ As of 31 December 2025

The Branch's core operational activities focused on corporate and institutional banking, including:

- **Corporate Lending:** Provision of commercial funding through syndicated and bilateral loan facilities;
- **Deposit-Taking:** Acceptance of deposits from wholesale clients; and
- **Correspondent Banking:** Facilitation of a very low volume cross-border payments for the Head Office.

As at 31 December 2025, the Branch employed 15 staff members in total. This composition represents a mixture of expatriate staff members from the Head Office and local hired talents:

- **Expatriate Staff:** Five(5) employees seconded directly from Head Office to ensure strategic alignment and oversight; and
- **Local Staff:** Ten(10) locally engaged employees subject to Australian employment laws and the Branch's local HR policies.

2.2 Supply Chains

LBOT operates its global business spanning across three continents – Asia, North America and Oceania. The Bank's supply chains across these overseas jurisdictions are primarily involved in the procurement of goods and services necessary to support office operations and staffing needs.

In particular, the Branch's supply chains are mostly service-based, supporting the operational needs of an office-based financial institution. Procurement activities are managed locally in the Branch with significant reliance on Head Office technologies and service agreements.

During the reporting period, the supply chain comprised of reputable Tier 1 suppliers from the following sectors:

- **Information technology and communications:** This category comprises large-scale, established global or national service providers that support our core banking infrastructure. Given their size and public disclosure requirements, these entities typically maintain robust internal controls regarding modern slavery;
- **Legal and professional services (including taxation and audit):** The Branch engages Tier 1 and specialist firms for legal, taxation, and audit services. These suppliers are predominantly based in Australia, employ highly skilled professionals, and are subject to strict professional codes of conduct and regulatory oversight, representing a low risk of modern slavery;
- **Property services:** This category includes lease management, utilities, and facility services. For our physical office presence, labour-intensive services - specifically cleaning and waste management - are provided as integrated components of our commercial lease arrangements. While these services are managed indirectly through our property managers and landlords rather than via direct contracts, we recognise the relatively higher inherent risk profile of the cleaning industry;
- **Office consumables and supplies:** This involves the procurement of generic office supplies and sundries sourced on an as-needed basis. These transactions are managed through established commercial retail chains and national distributors. These suppliers are typically large-scale, reputable organisations with their own independent reporting obligations under the Act.

LBOT enforces a strict zero-tolerance policy on exploitation. All suppliers are required to ensure that their workforce, including employees and sub-contractors, is legally authorised to work and engaged on a voluntary basis. The use of bonded, forced, or involuntary labour, child labour, or human trafficking in the provision of goods or services to the Bank is strictly prohibited.

3 RISK OF MODERN SLAVERY PRACTICES

3.1 Group Risk Exposures

LBOT recognises that the inherent risk of exposure to modern slavery practices increases in correlation with its expanding operational footprint. While the Branch is domiciled in a jurisdiction supported by a strong rule of law, the Bank acknowledges that its global network inevitably exposes the institution to geographies with elevated risk profiles.

The Bank has utilised external benchmarks, including the *2023 Global Slavery Index*, to map these jurisdictional risks which provides insight into the prevalence and risk indicators of modern slavery in each relevant jurisdiction. In this assessment, the Bank has assessed its inherent risk exposure to modern slavery practice as Low to Medium, primarily driven by the higher-risk geographies that the Bank has a presence in.

Beyond inherent geographic considerations, the Bank also evaluates the specific nature of its procured goods and services to holistically measure modern slavery risks. Due to the nature of the industry that the Bank operates in, majority of the suppliers provide professional, financial, administrative, and support services. Since these sectors are typically characterised by highly skilled labour and stringent regulatory oversight, the Bank concludes there is a limited likelihood that its operations or supply chains will cause, contribute to, or be directly linked to modern slavery practices.

3.2 Australian Branch Risk Exposures

The Branch has undertaken a further targeted risk assessment of its local operations and Tier 1 suppliers, and concluded the following:

3.2.1 Operational Risk

The Branch assesses the risk of modern slavery within its direct operations as Low.

- **Direct Employees:** The Branch's workforce consists of professional banking staff and expatriates in management level. These roles are highly skilled, subject to rigorous background checks, and governed by Australian employment legislation, award, and both the Bank and the Branch's HR policies;
- **Service Providers on Premises:** The Branch recognise a concentrated area of risk regarding base-skill workers who typically access the Branch's premises, specifically cleaning and security personnel. While these individuals are not direct employees, they work within our operations. The cleaning and security sectors are historically high-risk for underpayment and deceptive recruitment practices.

3.2.2 Supply Chain Risk

The Branch has mapped its Tier 1 suppliers and identified specific hotspots where the Bank may be directly linked to modern slavery practices through its business relationships:

- **High Risk – IT hardware and infrastructure**

While the software providers may be lower risk, the physical hardware the Branch rely on (e.g., laptops, monitors, servers) is predominantly manufactured in Southeast Asia which is known of forced labour. The Bank is exposed to this risk deeply within its supply chain (Tier 2 and beyond).

- **Medium Risk – Property services**

As noted above, the procurement of cleaning, waste management, and security services involves labour-intensive workforces. The risk here is often hidden in subcontracting arrangements.

- **Low Risk – Professional Services**

The majority of our procurement spend is with legal, audit and tax advisory firms. These suppliers employ qualified professional staff in regulated environments, representing minimal modern slavery risk.

3.3 Assessment of Causation

The Branch assesses its connection to the abovementioned risks as follows:

- **Cause:** The Branch do not believe our operations cause modern slavery (e.g., the Bank/Branch do not use forced labour);
- **Contribute:** The Branch is vigilant not to contribute to harm (e.g., by demanding cost reductions that force suppliers to cut costs); and
- **Direct Linkage:** The Branch acknowledge that it may directly linked to modern slavery risks through our procurement of IT hardware and building services. To mitigate this exposure, the Branch's strategy prioritises active engagement with these Tier 1 suppliers, leveraging contractual terms and conditions to mandate compliance and effectively manage supply chain risk.

Based on the nature of the Branch's banking activities and the controls, the residual risk of modern slavery in Australia operations is assessed as Low. Notwithstanding this assessment, the Branch will continue to be vigilant of this risk, acknowledging the persistent underlying potential for modern slavery to materialise.

4 ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

The Branch's approach to preventing modern slavery is deeply embedded within the Bank's overarching Environmental, Social and Governance (ESG) framework, ensuring consistent compliance with the binding obligations mandated by Head Office. This is further enhanced by prudential and regulatory controls executed at the local level.

4.1 Statutory Procurement Controls Under Taiwanese Laws

As a 100% state-owned financial institution, LBOT's global procurement strategy is strictly governed by Taiwan's *Government Procurement Act (the GPA)*². This statutory framework serves as the primary control mechanism to combat modern slavery risks at the Tier 1 supplier level:

- **Centralised Supplier Debarment**

The Bank is strictly prohibited from engaging with any entity listed on the Government e-Procurement System (政府電子採購網). This mandatory blacklist automatically excludes known offenders of labour or ethical standards from the global supply chain.

- **Labour Standards Compliance**

Procurement contracts governed by the GPA mandate compliance with the Taiwan *Labour Standard Act*³. This embeds critical safeguards against forced labour, the illegal retention of identity documents, and wage theft.

Collectively, these statutory requirements provide a strong baseline for transparency and risk mitigation across LBOT's core procurement activities.

4.2 Head Office Governance and Oversight

The Sustainability Development Committee (**the Committee**) was established in 2021 with Board approval to provide central governance and strategic oversight of the Bank's ESG agenda and its long-term sustainable development. The Committee is responsible for setting sustainability priorities, overseeing implementation of ESG initiatives, and monitoring performance across the organisation. In January 2025, the Committee was restructured as a formal functional committee, comprising the Chairman, President and all Independent Directors, thereby strengthening Board-level accountability for sustainability outcomes⁴.

- **Supplier CSR Integration:** Under the Committee's direction, mandatory supplier corporate social responsibility (CSR) indicators (廠商企業社會責任(CSR)各面向指標) have been integrated into all tender documentation, forcing suppliers to demonstrate responsible business practices prior to engagement;
- **Supplier Capability Uplift:** The Committee drives external engagement, including co-hosting industry conferences, to elevate supplier awareness and align our vendor ecosystem with evolving global responsible sourcing standards.

² <https://law.moj.gov.tw/ENG/LawClass/LawAll.aspx?pcode=A0030057>

³ <https://law.moj.gov.tw/ENG/LawClass/LawAll.aspx?pcode=N0030001>

⁴

<https://www.landbank.com.tw/Category/Items/%E6%B0%B8%E7%BA%8C%E7%99%BC%E5%B1%95%E5%A7%94%E5%93%A1%E6%9C%83>

4.3 Branch Operational Control and Due Diligence

While the Head Office framework provides a robust legal foundation, the Branch deploys a more localised operational control to assess and address risks specifically within the Australian regulatory landscape.

4.3.1 Supplier Due Diligence

The Branch categorises third parties as either 'service providers' or 'vendors'. Service providers engaged for ongoing, material functions are subject to comprehensive due diligence, fully integrated with the Branch's *Service Provider Policy* and the operational risk management requirements under the APRA *Prudential Standard CPS 230 Operational Risk Management (CPS 230)*. During the reporting period, the Branch undertook the following actions to assess the associated risks:

- Conducted risk-based due diligence screening prior to onboarding any new service provider; and
- Systematically obtained and reviewed the annual Modern Slavery Statements of our Tier 1 suppliers (where they are reporting entities under the Act) to confirm the adequacy of their own downstream controls.

4.3.2 Supporting Policies

Our control environment is supported by a comprehensive suite of localised policies:

- **Service Provider Policy:** Ensures all procurement aligns with prudential expectations for supply chain transparency and operational resilience;
- **Personnel Policy:** Guarantees strict compliance with Australian employment standards, awards, and workplace protections under the *Fair Work Act 2009*.
- **Compliance Policy:** Formalises the obligations under the *Modern Slavery Act 2018 (Cth)*, establishing clear accountabilities for the preparation, review, and lodgement of this annual statement.

4.3.3 Remediation

The Branch is committed to address any identified risks through structured remediation rather than immediate divestment, which can often exacerbate harm to vulnerable workers.

- **Corrective Actions:** The Branch is committed to actively engage with the suppliers to discuss and resolve any identified risks during due diligence or ongoing monitoring, to ensure the effective development and implementation of necessary corrective action plans;
- **Whistleblower Framework:** The Branch maintains an accessible, confidential grievance mechanism supported by the *Whistleblower Policy*. This framework is compliant with the whistleblower protections under the *Corporations Act 2001*, enabling applicable parties to report suspicions of modern slavery or ethical breaches without fear of retaliation or detriment.

4.4 Training and Awareness

All Branch staff members are required to complete mandatory annual modern slavery training. This targeted training equips participants, particularly those in procurement, risk, and compliance roles, with the practical tools to identify modern slavery red flags, understand reporting escalation paths, and respond proportionately to risks identified within the Branch's supply chains.

5 ASSESSING THE EFFECTIVENESS OF ACTIONS TAKEN

The Branch evaluates the efficacy of its modern slavery risk management through a continuous improvement feedback loop, which is deeply integrated into its broader risk and compliance frameworks. These frameworks provide the foundation for identifying, monitoring and responding to modern slavery risks across the Branch's operations and supply chains.

Effectiveness is evaluated through ongoing performance assessment against key performance indicators, including the timely completion of supplier review and the implementation of remediation measures where risks are identified. Satisfactory outcomes against these indicators provide assurance that controls are operating as intended.

Internal effectiveness is further validated through continuous capability assessments. During the reporting period, the Branch utilised targeted online training and post-training assessment to confirm that employees can accurately identify modern slavery risk and risk indicators, and understand the specific protocols for escalation.

Furthermore, the Branch actively monitors the efficacy of its grievance mechanisms. This includes periodic reviews of the whistleblower framework to ensure reporting channels remain highly visible, easily accessible, and free from any impediments, guaranteeing that staff members can raise concerns safely and anonymously.

The outcomes of these effectiveness assessments are reported annually to the SOOA and relevant committees. This ensures that any identified gaps in the Branch's supply chain or due diligence processes directly inform targeted enhancements for the subsequent reporting period.

6 CONSULTATION PROCESS

As the Australian Branch operates within the Bank's global corporate structure, it maintains a formal and continuous consultation process with the Head Office. This structural dialogue ensures a unified, enterprise-wide approach to modern slavery risk management, guaranteeing that the Branch remain aligned with the Bank's ESG commitments while strictly adhering to local legislative requirements under the Act.

During the reporting period, the consultation process between the Branch and Head Office was executed through several key mechanisms:

- **Governance and Policy Alignment:** Through the annual policy review cycle and each individual procurement exercises, the Branch actively engage with the Head Office Department of Compliance to ensure that group procurement policies and practices are effectively localised and deemed fit-for-purpose within the Australian prudential and regulatory context.
- **Statement Preparation:** The preparation of this Modern Slavery Statement was a collaborative exercise. The Branch conducts local supply chain risk assessments and drafted the initial disclosures. This was subsequently submitted to the Head Office for review before finally approved by SOOA.

7 OTHER RELEVANT INFORMATION

The Bank recognises that the suppression of modern slavery is a fundamental component of our overarching ESG strategy. The Bank is committed to fostering a culture of transparency, ethical conduct, and respect for universal human rights across our global operations and extended supply chains.

To provide stakeholders and regulatory bodies with a comprehensive view of our sustainable development initiatives, detailed Sustainability Reports can be accessed and downloaded through the company's official website portal using the following pathway:

Home > Sustainability > Sustainability Report Download (永續發展 - ESG 總覽 - 下載專區)