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Modern Slavery Statement

1 Jul 24 – 30 Jun 25 (FY25)

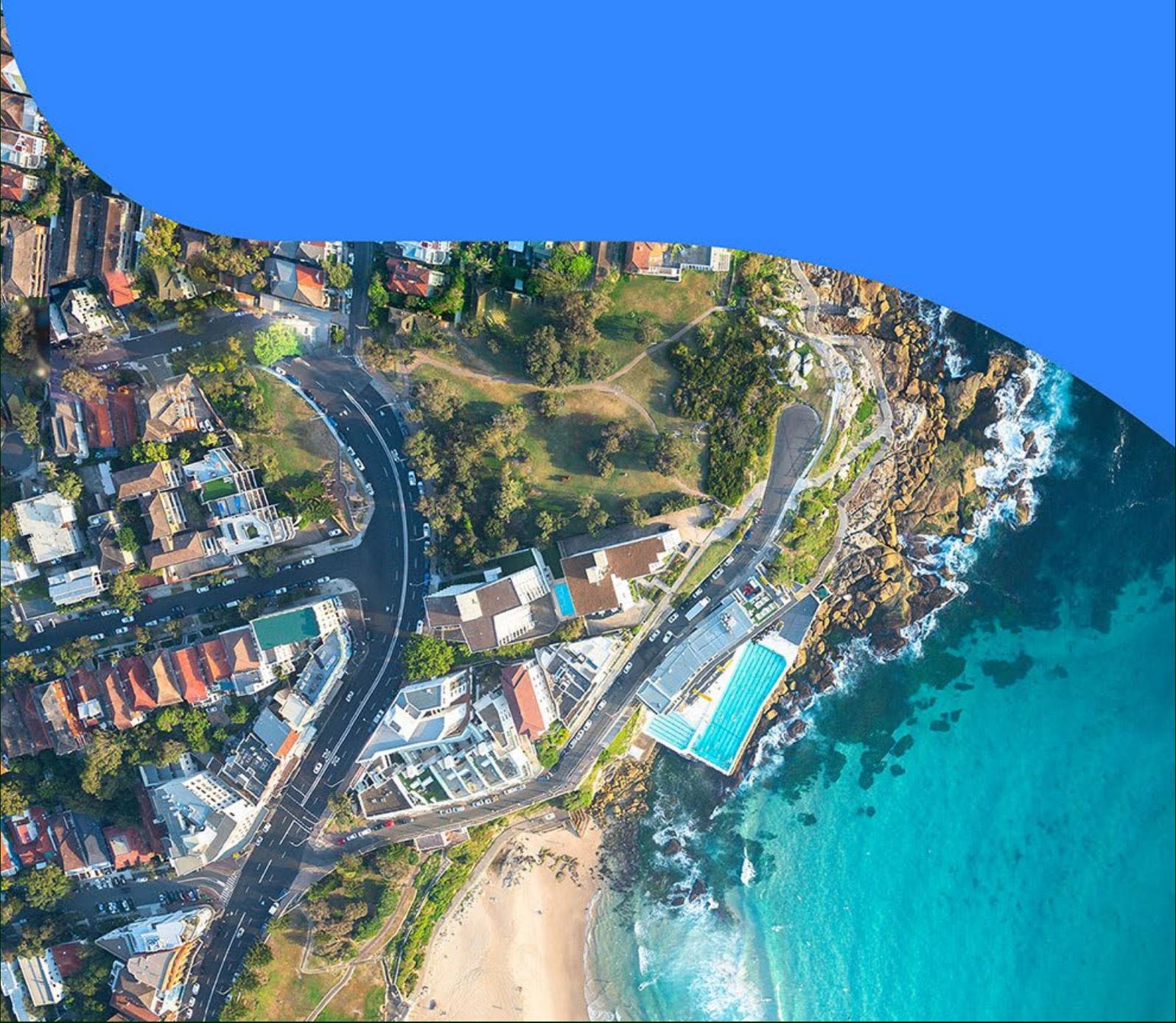


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FY25 Modern Slavery Statement

1. Introduction

This is the sixth Modern Slavery Statement (“Statement”) for NSW Land Registry Services (“NSW LRS”) made under the Modern Slavery Act 2018 (Cth).

The purpose of this statement is to outline our approach to ensuring that NSW LRS has robust frameworks and processes in place to minimise the risk of modern slavery in our business operations and supply chain.

At NSW LRS, we recognise that slavery and human trafficking can occur in many forms, as considered in the Act. NSW LRS is fully committed to operating responsibly and establishing and adhering to the highest ethical standards across our group. We will not tolerate any forms of slavery in our business.

2. Our structure

This Statement is made by the reporting entity, Australian Registry Holdings Pty Ltd (ABN: 44 617 925 943) as trustee for the Australian Registry Holdings Trust (ARH) (ABN: 80 728 447 273) and its controlled entities¹. NSW LRS is the trading name of Australian Registry Investments Trust (ARI), a private trading trust that is a controlled entity of ARH.

3. Our business

NSW LRS is the private operator of the NSW land titles registry on behalf of the NSW Government under a 35-year concession that took effect on 1 July 2017. Since the concession took effect, NSW LRS has improved service outcomes for customers, invested to enhance the security of the register and enabled digital innovation in the conveyancing and surveying sectors.

We operate under the business name NSW Land Registry Services. For more information on our business, please refer to our website at www.nswlrs.com.au

¹ ARH is the holding entity for a group of entities that include Australian Registry Investments Pty Ltd (ABN 79 617 926 020) as trustee for the Australian Registry Investments Trust (ABN 23 519 493 925); Australian Registry Services Pty Ltd (ABN 75 617 926 066) as trustee for the Australian Registry Services Trust (ABN 60 488 993 202) and Australian Registry Finance Pty Ltd (ABN 38 617 925 916). The matters reported on in this statement apply equally to the above entities.

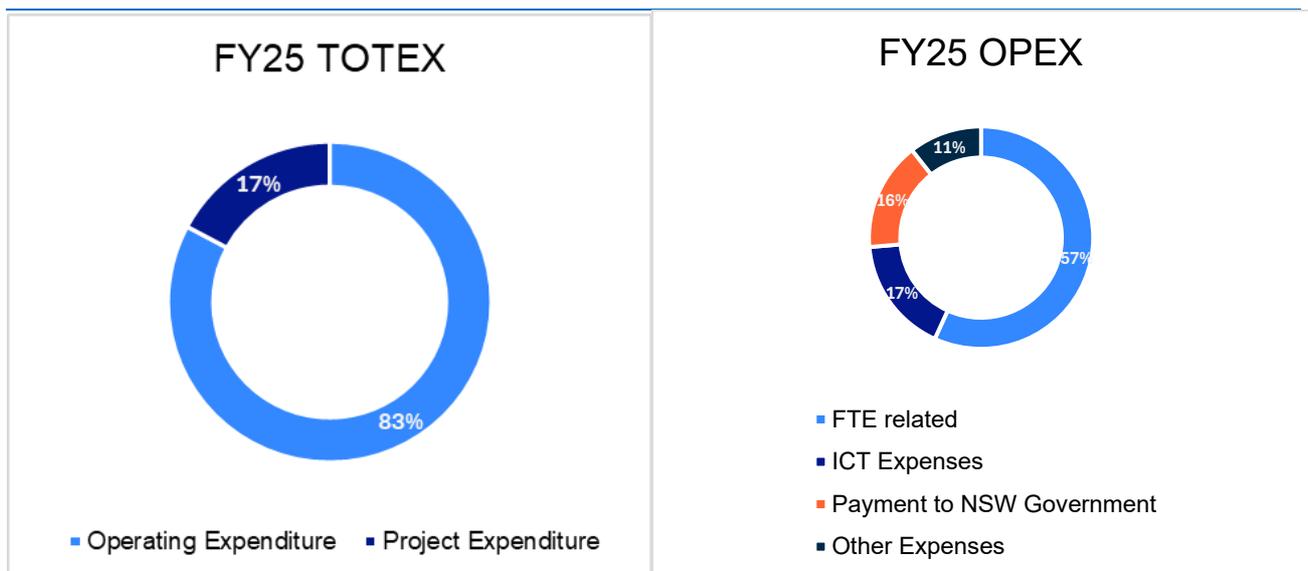
3.1 Operations and supply chain

NSW LRS is the operator of the NSW land registry system and is headquartered in the Sydney CBD. Our customers include individuals, governments, businesses, the financial sector, Electronic Lodgment Network Operators (“ELNOs”), information brokers, conveyancers and other professional firms that use NSW LRS services for property related transactions and services.

To provide our services and support our functions, we employed approximately 226 staff members during the reporting period. This number consisted of both direct employees and subcontractors, all of whom were based in NSW.

Under our 35-year Concession Deed, and being an exclusively, state-based service provider, we are afforded the protections and obligations under various Acts such as the Fair Work Act 2009 (Cth) and The Industrial Relations Act 1996. The acts cover several workplace rights around safety, remuneration, discrimination, and exploitation.

As the NSW land registry system is principally hosted in an electronic form, our costs are primarily comprised of people related costs, information and communication technology (ICT) expenses (both software and hardware), professional services/consultancy fees and fees paid to the NSW State Government. In addition to services for our customers, there is a small footprint of spend related to our employees such as office supplies, hospitality (food and beverages) and facility operations such as maintenance and cleaning.



Source: Management accounts for FY25

4. Risk assessment

4.1 Overview

The following illustrates the corporate governance which governs the response to the Modern Slavery Act at NSW LRS:



For FY25, NSW LRS undertook risk assessments of modern slavery risks in our operations and supply chains over the reporting period, in accordance with our Risk Management Policy. Our risk management processes undertaken for FY25 are consistent with the current international standard *ISO 31000:2018 Risk Management – Guidelines*. Following these risk assessments in FY25, we have concluded that risks of Modern Slavery in NSW LRS operations and its supply chain are **low**, with risks principally in ICT procurement and building services.

Further to this, our analysis did not reveal any actual or potential cases of Modern Slavery practices within our operations or supply chain. This assessment was noted by the Audit and Risk Committee

(ARC) and the Board. This **low** risk assessment informs us of our compliance activities where we focus on tracking vendor payments to suppliers with a Modern Slavery position and supplier diligence through Self-Assessment questionnaires.

4.2 Operations and workplace risk assessment

Overall, we have not identified or had any evidence of modern slavery practices within our operations or workplace. We deem the modern slavery risk within our operations and workplace as low but will continue to monitor and amend this rating when necessary.

NSW LRS has a NSW based workforce and with this, we note that Transparency International rates Australia with a corruption perceptions index (CPI) score of 77/100 (Low)² and The Walk Free Foundation classifies Australia's Slavery index as 7/100 in terms of vulnerability³. All employees are provided with a written contract prior to commencing at NSW LRS. This contract outlines key details such as working hours and remuneration which is signed by both parties to signify acceptance. NSW LRS has a strong and deep-working relationship with the NSW Government on whose behalf we provide land titling services for the people of NSW and our stakeholders and as such, hold ourselves accountable in ensuring we comply with all relevant Acts such as, but not exclusively, the Fair Work Act 2009 (Cth) and Industrial Relations Act 1996 (NSW).

Whilst the majority of our workforce is directly employed through NSW LRS, approximately 12% are contractors engaged through third-party solution providers or companies specialising in staff augmentation. We engage contractors based on business and specific project needs where we don't have the expertise in house. Engagements with these third-party suppliers are governed by our third-party engagement guidelines as well as Master Service Agreements (MSA) and Statements of Work (SOW).

4.3 Supply chain risk assessment

The most notable labour risk we have within our supply chain relates to third party vendors we engage for ICT products and services. These include, but are not limited to, software, hardware, and consulting services. Whilst this sector alone does not present a high-risk, we are acutely aware that heavy reliance on electronics, software development and various other components can expose NSW LRS to an indirect risk of modern slavery. We have identified that the raw materials and labour required to build some, or all these components, can come from middle-third world countries where modern slavery is more prevalent. In order to mitigate this risk, NSW LRS ensures

² <https://www.transparency.org/en/cpi/2024/index/aus>

³ <https://www.walkfree.org/global-slavery-index/map/#mode=map:country=AUS:region=1:map=prevalence:year=2023:view=recommendations>

that all suppliers onboarded either fill out our self-assessment modern slavery questionnaire or provide us with their own Modern Slavery Statement.

Overall, we have not identified or had any evidence of modern slavery practices within our direct supply chain. We deem the modern slavery risk within our direct supply chain as low but will continue to monitor and amend this rating if/when we onboard additional vendors, purchase new goods or have a change in our procurement policies and/or procedures. We also intend to continuously engage our suppliers as part of our continuous improvement initiatives to ensure that they are also mitigating the risk of modern slavery within their operations.

5. Actions

NSW LRS understands the inherent risk of in-action and that Modern Slavery cannot be nullified without the voluntary commitment and collaborative efforts across our operations as well as all points across the value chain. As such, NSW LRS has undertaken several actions to address the risks of modern slavery, including:

- Implementing specific staff training on the risks of Modern Slavery to all staff directly involved in procurement related functions;
- Raising awareness of Modern Slavery for relevant NSW LRS staff;
- Participating in global ESG benchmarking to measure the performance across all material social issues including aspects of Modern Slavery;
- Implemented a dedicated Diversity, Inclusion, Belonging & Equity policy and ESG policy, serving to strengthen corporate governance around Modern Slavery issues;
- Conducting due diligence on all vendors where payments totalled \$20,000 or more in FY25; and
- Continuously improving our “Self-Assessment Questionnaire” which is sent to all new suppliers as part of their on-boarding process.

Given our culture of continuous improvement, NSW LRS plans to expand the actions taken in relation to Modern Slavery. This is discussed further in section 7.

6. Measuring effectiveness

To date, NSW LRS has not identified any actual or potential cases of modern slavery within its operations.

In the event that an actual or potential incident of modern slavery is identified with NSW LRS’ supply chain, it would be treated in a similar manner to any material health or safety incident, namely, key stakeholders would be notified, remedial measures implemented, and the incident response is tracked until closure.

NSW LRS monitors a range of indicators, as outlined in the table below, to assess the effectiveness of its approach, seeking to review and enhance measurement indicators in line with continuous improvement.

Focus area	Indicator	FY25
Payments diligence	# of vendor Modern Slavery policies reviewed	85
Payments diligence	% of total vendor payments tracked to a reviewed Modern Slavery position	84%
New Supplier diligence	# of Self-Assessment Questionnaires completed in FY25	34
Reports	# of reports of slavery or trafficking through Whistleblower or other reporting channels	0

7. Continuous improvement

NSW LRS understands and acknowledges that modern slavery is a problem we face globally and regardless of the fact that we operate only within Australia, we can still be exposed to the risks of modern slavery. Due to this risk, NSW LRS is committed to continuously improving our internal processes, policies, practices, and controls in order to assess and mitigate the risk or contribution to modern slavery practices through our business operations and supply chain.

NSW LRS will continue to review and enhance its approach to addressing modern slavery risks within its supply chain and parts of its business operations by:

- Reviewing all Modern Slavery Self-Assessment Questionnaire's received as part of the procurement process;
- Continuing to conduct line by line reviews of current and proposed vendors;
- Continuing to train all staff on NSW LRS' Code of Conduct and key staff on ESG and supplier governance requirements, including further modern slavery training where relevant; and
- Continuing to participate in global ESG benchmarking in order to measure performance across all material social issues including aspects of Modern Slavery.

8. Consultation

The contents of this Statement were reviewed both by NSW LRS' executive team and the Audit and Risk Committee in November 2025. We note that a common Board of Directors applies to ARH and its controlled entities. Therefore, each entity is aware that ARH is preparing this statement that equally applies to its controlled entities.

In addition, NSW LRS continues to engage external experts, where required, to assist in our understanding of the obligations under the Modern Slavery legislation and support our modern slavery risk assessment.

9. Endorsement

This FY25 Modern Slavery Statement was approved by the Board of Australian Registry Holdings Pty Ltd as trustee for the Australian Registry Holdings Trust and will be updated annually. As set out above, the Board is ultimately responsible for NSW LRS' risk management framework.

The Board has delegated the authority to the Chairman and CEO to sign the statement on behalf of NSW LRS.



Michael Cameron

Chairman

27 November 2025



Clark Butler

Interim CEO

27 November 2025

10. Appendix

Item no.	Mandatory criteria	NSW LRS Modern Slavery Statement Heading	Page no.
16(1)(a)	Identify the reporting entity	2 – Our Structure	2
16(1)(b)	Describe the structure, operations, and supply chains of the reporting entity	2. Our Structure 3.1. Operations and supply chain	2 - 3
16(1)(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	4. Risk assessment 4.1. Overview 4.2. Operations and workplace risk assessment 4.3. Supply chain risk assessment	4 - 6
16(1)(d)	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	5. Actions 6. Measuring effectiveness	6 - 7
16(1)(e)	Describe how the reporting entity assesses the effectiveness of such actions	6. Measuring effectiveness 7. Continuous improvement	6 - 7
16(1)(f)	Describe the process of consultation with <ul style="list-style-type: none"> - Any entities that the reporting entity owns or controls; and - In the case of a reporting entity covered by a statement under section 14—the entity giving the statement; 	8. Consultation	7
16(1)(g)	Include any other information that the reporting entity, or the entity giving the statement, considers relevant	8. Consultation	7
16(2)	Provide the details of approval by the principal governing body of the reporting entity	9. Endorsement	8



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Australian Registry Investments Pty Ltd (ACN 617 926 020) as trustee for the Australian Registry Investments Trust trading as NSW Land Registry Services.