



# Modern Slavery Statement

## 2024

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This Modern Slavery Statement has been prepared in line with the requirements of the Australian Modern Slavery Act 2018 (Cth) (the MSA). This Statement is made by Secure Electronic Registries Victoria Pty Ltd (ACN 627 986 396) as trustee for the Secure Electronic Registries Victoria Trust (ABN 83 206 746 897) (SERV) and its related entities as described in footnote 1. The Statement explains the actions that SERV has taken to assess and address potential modern slavery risks related to its operations and supply chain during the financial year ended 30 June 2024 (FY2024).

## Executive Summary



Modern slavery is a term used to describe situations where coercion and threats of deception are used to exploit victims and undermine or deprive them of freedom. Modern slavery rarely occurs in isolation. It forms part of other complex challenges and systems, including gender and racial discrimination, weak rule of law and low wages. SERV recognises modern slavery is a global issue, which takes many forms of serious exploitation such as human trafficking, slavery, servitude, forced labour, forced marriage, debt bondage and child labour.

The 'Global Slavery Index', an authoritative global study of modern slavery published by leading non-government organisation Walk Free, the Minderoo Foundation (the Global Slavery Index), reports that an estimated 50 million people were living in modern slavery on any given day in 2021, an increase of 10 million people since 2016.

As the custodian of one of the largest registries in Australia, we administer more than one million property transactions every year and are a vital part of the Victorian economy. We work in partnership with the Government for the people of Victoria. Consistent with our core values and environmental, social, and governance (ESG) strategic objectives of sustainability, we believe as a member of the business community we play an important role in addressing modern slavery by ensuring the goods and services purchased through our mostly Australian-based supply and value chains are ethical and minimise or eradicate modern slavery risks.

SERV respects the human rights of our people, our partners, our customers, suppliers and the community we operate in. Our intentions are to identify and manage the risks related to human rights across our business and through our supply chain management. SERV seeks to engage fairly with suppliers to source ethically and sustainably. When engaging new suppliers, we conduct due diligence to assess diverse supplier risks including the risk of modern slavery.

SERV's analysis shows its risk of modern slavery remains low, however we continue to monitor our exposure by making our supply chains and procurement process more transparent which enables responsible decision-making.

This is our fifth modern slavery statement. In addition to this statement meeting specific legal reporting requirements under the Modern Slavery Act 2018 (Cth), it also outlines our risk methodology and rating, actions taken plus our future-plans to strengthen our modern slavery compliance program year on year. This modern slavery statement for FY24 was approved by SERV's Board of Directors on 4 December 2024.

*Cheryl Batagol*

Cheryl Batagol (Dec 10, 2024 12:20 GMT+11)

Cheryl Batagol  
**Chair, SERV**

# About Us

## Identification and structure

For the purpose of this statement, Secure Electronic Registries Victoria Pty Ltd (ACN 627 986 396) as trustee for the Secure Electronic Registries Victoria Trust (ABN 83 206 746 897) (SERV) is the reporting entity under the Modern Slavery Act 2018 (Cth) ("**Act**").<sup>1</sup> Since the commencement of our operations in August 2018, the principal activity of SERV has been to provide land registry related products and services pursuant to the terms of a 40-year Operating Concession Deed (Concession Deed) granted by the State of Victoria.

Our sole shareholder is Aware Super, an Australian-owned superannuation fund with more than 1.1 million members, consisting mainly of public service professionals.

We're an independent company with our own board and executive team. We work in partnership with the Victorian Government and are regulated by the Victorian Registrar of Titles. We have approximately 150 employees. SERV operates exclusively in Australia. The registered office and principal place of business of SERV is in Docklands, Victoria, 3008.

## Our Vision

To be the preferred provider of trusted registry services in Victoria.

## Values and Behaviours

The SERV values, define our actions, unite our employees and define our brand:

### *SERV's values*



Authentic



Bold



Pioneering



Pragmatic



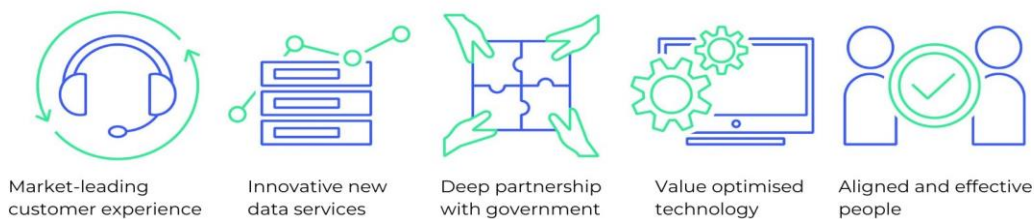
Exceptional

<sup>1</sup> SERV is the sole shareholder in SERV Finco Pty Ltd (ACN 627 986 476) (SLFPL) and the matters reported in this statement also cover SLFPL's activities.

## Our SERVices

Our five strategic enablers underpin our daily operations. Working closely with our government partners, we invest in our people and technology to deliver the best possible experience for our customers. We are committed to the highest standards of integrity and ethical conduct, and we expect all individuals and entities who supply goods or services to SERV to comply with the laws of the State of Victoria and the Commonwealth of Australia. This includes expectations related to integrity and ethical conduct, labour, human rights and safe workplaces, information privacy and data security, environmental impact and compliance and governance.

*SERV's strategic enablers:*



## Operations and Supply Chain

SERV is a people-focused technology, data services and insights business, providing transaction processing and information delivery services to Victorian businesses and consumers. SERV has an Australian-based workforce. Less than 25% are contractors engaged through a third-party vendor or labour hire company. We have a strong commitment to information privacy and data security, including the prevention of unauthorised transborder data flows, which means that the breadth of our international supply chain is reduced.

*SERV's Customers:*



Our operations include: (1) provision of registry and LANDATA® services; (2) development and provision of new data insights and services; and (3) administration of technology and IT systems on behalf of the State of Victoria. SERV has privileged access to single source registry data, and operates LANDATA®, an online delivery service that delivers a range of property certificates to industry and the people of Victoria. As a result, SERV inherited public sector data sharing arrangements with other State Government Agencies, including local authorities and councils ("**counterparties**"), who we engage with directly in connection with the conditions and requirements of our 40-year concession. For the purposes of this statement, we have considered these State Government Agencies to be recipients of SERV's services, not suppliers that are part of SERV's supply chain.

# Our Modern Slavery Risk

## Risk Assessment Summary

### Methodology

SERV remains committed to taking a proactive, whole-of-company approach to eradicating modern slavery risks across its supply chain and workforce.

In 2024, we used data provided by an external ESG technology and data business, FairSupply Pty Ltd (**FairSupply**) to support our risk assessment process.

We continued to use FairSupply's proprietary technology, which includes company spend through global markets, to trace the economic inputs required to produce products and services and maps supply chains to ten tiers, representing the suppliers of suppliers up to the tenth supplier. Tiers 1 to 3 of supply chains are representative of supply chain labour that is "caused" or "contributed" to by a company. Tiers 4 to 10 represent supply chain labour that is "directly linked" to a company's spend.

This process provided SERV with a theoretical modern slavery risk across its supply chain incorporating the following:

- Industry;
- Geography; and
- Relative spend

### Supply Chain Risk Assessment, using FairSupply

0.1611	The number of theoretical people in forced labour in SERV's supply chain
0.0074	The number of theoretical people in forced labour in SERV's supply chain <b>per million dollars spent</b>
0.1067	The number of theoretical people in forced labour in SERV's supply chain <b>mapped from tier 1 to tier 3</b>
Low	SERV's potential to cause, contribute or be directly linked to modern slavery, including in its supply chain.

SERV has an overall theoretical modern slavery risk across its supply chain of low, with 88% of its suppliers theoretically categorised as "low risk" and the remaining 12% theoretically categorised as "low-moderate" risk. Our analysis has not indicated a requirement for immediate supplier risk-based actions to understand or further mitigate any instances of heightened Modern Slavery risk across our supply chain.

The estimated number of people in forced labour in SERV's supply chain per \$M spent up to tier 10 is **0.0074**. This reduced by 0.0002 from SERV's FY2023 analysis. Based on SERV's FY24 supplier spend there are an estimated **0.1611** people in forced labour across the entirety of our supply chain.

SERV's focus in financial year 2024 was specifically on tiers 1 to 3 of its supply chain, representing supply chain labour that is "caused" or "contributed" to by a company. Across these tiers SERV has an estimated number of people in forced labour of **0.1067**.

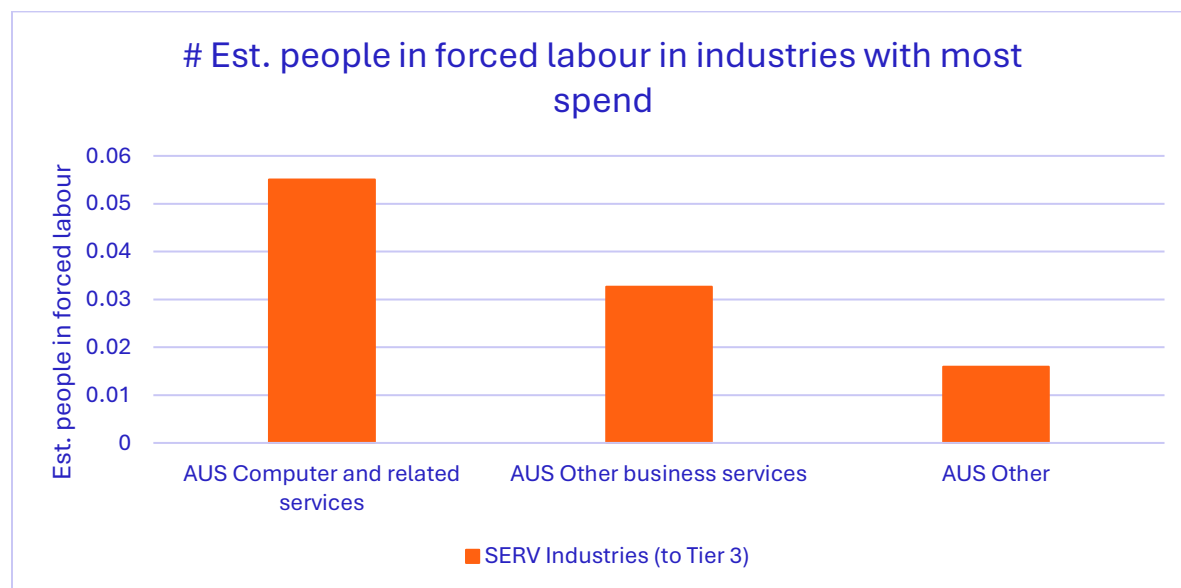
SERV's current assessment determined that our potential to cause, contribute to or be directly linked to modern slavery, including in our supply chain, is low.

## Industry

SERV's supply chain analysis confirms almost 100%<sup>2</sup> of SERV's direct spend occurs within Australia<sup>3</sup>. SERV's highest tier 1 to 3 supply chain spend occurs across the following industries:

- 1) **Computer and related services** – services which support computing such as provision of cloud computing, artificial intelligence, IT consulting and disaster recovery services.
- 2) **Other business services** – services which support businesses to deliver their output. This encompasses a broad range of services such as accounting, legal advice, provision of outsourced labour, market research, cleaning, advertising, and consulting services.
- 3) **Other (miscellaneous)** – Expenditure directed to all other types of services such as hotels and restaurants, retail trade sector etc.

Figure 1 (below) shows the 'computer and related services' industry, with 0.055 estimated number people in forced labour was the highest industry in SERV's supply chain mapped to tier 3.



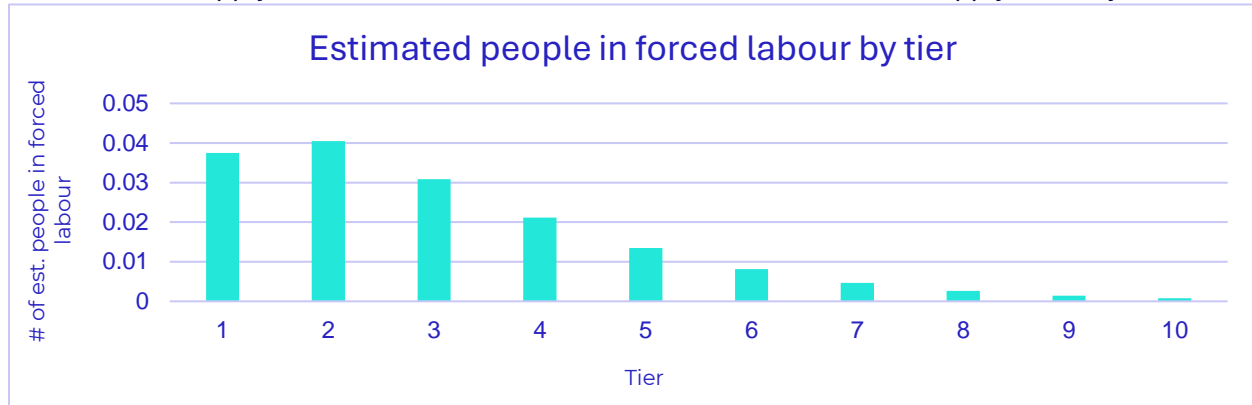
**Figure 1:** SERV tier 1 to 3 spend, industry by estimated people in forced labour per \$M.

<sup>2</sup> 98.5%

<sup>3</sup> Supply chain analysis provided by FairSupply Analytics Pty Ltd, based on SERV's FY24 supplier data.

## Supply Chain Tiers

Figure 2 (below) represents SERV's estimated people in forced labour, mapped to tier 10, across SERV's entire supply chain. The total number of theoretical slaves in our supply chain by tier is low.



**Figure 2:** Estimated people in forced labour by tier

## Geography

SERV engages suppliers from within and outside Australia, and some of our suppliers deliver support services outside the country in which they are incorporated, including in higher-risk geographies. SERV's occasional engagement of certain suppliers located outside Australia reflects the reality of our digital operating environment and our exposure to the technology industry. According to SERV's supplier spend records, 98.5% of supply chain spend in FY2024 occurred within Australia<sup>4</sup>.

Table 1 (below) represents the estimated number of people in forced labour in SERV's supply chain by geography, mapped to tier 3. The majority (40%) of the estimated number of people in forced labour is in Australia, which has been identified as having low prevalence of modern slavery risk.<sup>5</sup>

**Table 1:** Top 5 countries based on total # of estimated people in forced labour and supplier geography up to tier 3.

#	Country	Estimated people in forced labour (total) to tier 3	% of total
1	Australia	0.0109	40%
2	India	0.0043	16%
3	China	0.0020	7%
4	United States of America	0.0012	4%
5	Indonesia	0.0008	3%

<sup>4</sup> Supply chain analysis provided by FairSupply Analytics Pty Ltd, based on SERV's FY24 supplier data. 11 of 149 suppliers located outside of Australia.

<sup>5</sup> The country-level data on prevalence of modern slavery (Global Slavery Index 2023) estimates the prevalence of modern slavery in Australia is low. See: Minderoo Foundation (2023). [The 2023 Global Slavery Index](#).



# SERVing Ethically

## Addressing our modern slavery risks

SERV recognises that following the review of Australia's Modern Slavery Act in March 2023, we can expect a stronger and more robust Act. Our focus remains, year on year, to apply a continuous improvement approach to monitoring our supply chain, maintaining our supplier risk profile and implementing recommendations for uplift, with a view to prioritising higher risk operational and supply chain risks. The key activities in place for this reporting period, including those that assist us with continuous oversight of our supply chain, and our future mitigation plans are highlighted below.



### Due Diligence Process

#### △ New Supplier Procurement and Onboarding Checks

Whilst we have existing practices in place in relation to supplier selection and due diligence, we continue to further strengthen and streamline these processes, as appropriate, to try to determine if suppliers present with any factors that increase their modern slavery risk. We have also standardised modern slavery questions / identification into our Vendor due diligence checklist. We seek to try to identify relevant triggers of potential modern slavery risk prior to engagement of new material suppliers (those with a high projected annual spend), and thereby try to further minimise having caused or contributed to estimated people in forced labour or being directly linked to supply chain labour in countries with high prevalence of modern slavery risk.

#### △ Supplier monitoring

We have established partnerships with our material suppliers and have a strong supplier monitoring program in place. We continue to monitor factors of existing material suppliers based on industry, geography, and relative spend, that may change over time, potentially contributing to modern slavery risk within in our supply chain.



### Compliance

#### △ Reporting & Remediation

The modern slavery reporting requirements are overseen by SERV's Risk and Compliance team, who provide second line risk oversight. During this reporting period, our Risk and Compliance team undertook a more detailed analysis of SERV's supply chain risk. SERV management periodically reports on supplier risk (which includes modern slavery) to SERV's Audit and Risk Committee. We monitor and respond to any complaints received by customers, suppliers, contractors or third parties, including through SERV's formally established Whistleblower platform. We record findings and remedial actions in our governance, risk and compliance reporting systems.

### △ Policy Framework

SERV maintains its suite of policies and procedures that assist us with the continuous oversight of our supply chain. Key policies include:

- Whistleblower Policy and a hotline;
- Conflict of Interest Policy;
- Anti-bribery Policy;
- Code of Conduct for employees;
- Supplier Code of Conduct; and
- Vendor Due Diligence Checklist.

The policies are included in onboarding for new employees and covered through SERV's on-going training and awareness programs. We also ask that our suppliers comply with our Supplier Code of Conduct. In addition, we seek to incorporate specific modern slavery (and anti-bribery) contractual clauses in our contracting terms, taking a risk-based approach.

### △ Education and Training

SERV's Legal team has provided education to key employees associated with procurement and contracts management on identification of modern slavery risks and appropriate mitigation measures to put in place. We rolled out a specific Modern Slavery training module for our Executive and for all employees involved in procurement and / or supplier relationship management. The module includes the essentials of Modern Slavery and SERV's approach towards eradicating this.

### △ Environmental, Social, and Corporate Governance (ESG) Framework

As SERV advances its ESG framework, we will continue to consider how to enhance our human rights policies and procurement processes, and how best to deliver targeted and impactful communications to our personnel about the measures we have implemented to mitigate our modern slavery risks, in the context of our values-based approach to business.

## Assessing Effectiveness

Using industry data, we have a tangible and quantifiable way to assess our theoretical supply chain risk, and this provides an indicator of the effectiveness of our modern slavery program. This and our procurement Vendor Due Diligence checklist helps us to assess the effectiveness of our controls in managing our modern slavery risk exposure.

## Consultation

This Statement covers SERV and relevant group entities, including SERV Finco Pty Ltd (ACN 627 986 476) which is wholly owned by SERV. SERV is the only operating entity within the group and the only entity that has engaged suppliers. In preparing this statement, SERV has consulted with SERV Finco Pty Ltd.









# SERV Modern Slavery Statement December 2024

Final Audit Report

2024-12-10

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