



# Modern Slavery Statement FY2020



This Modern Slavery Statement has been prepared in line with the requirements of the Australian *Modern Slavery Act 2018* (Cth) (the MSA). The Statement covers the reporting entity Victorian Land Registry Services Pty Ltd (ABN 86 627 986 396) as trustee for the Victorian Land Registry Services Trust (ABN 83 206 746 897) (VLRS) and the related entities noted at footnote 1. The Statement explains the actions that VLRS has taken to assess and address potential modern slavery risks related to its operations and supply chain during the financial year ended 30 June 2020 (FY2020).

## Purpose

In this statement, we outline the policies, standards and processes that contribute to our control framework to protect against the risk of modern slavery practices, as well as our commitment to assessing, measuring and mitigating such risks.

This is the inaugural statement submitted by our organisation under the MSA, based on our assessment of the risk of modern slavery in both our operations and supply chains. Based on our business model and geographical footprint, VLRS believes that our potential to cause, contribute to or be directly linked to modern slavery, including in our supply chain, is overall low.

We will continue to report under the MSA regime from this time through impactful and transparent reporting.

## About Victorian Land Registry Services (VLRS)

The entity that makes this submission is Victorian Land Registry Services Pty Ltd (ABN 86 627 986 396) as trustee for the Victorian Land Registry Services Trust (ABN 83 206 746 897 (together, **VLRS**)).<sup>1</sup> Since the commencement of our operations in August 2018, the principal activity of VLRS 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.

VLRS operates exclusively in Australia. The registered office and principal place of business of VLRS is Melbourne, Victoria, 3000. The sole shareholder of VLRS is Aware Super, an industry superannuation fund.<sup>2</sup>

## Structure and Operations

VLRS is a people-focused technology, data services and insights business, providing transaction processing and information delivery services to Victorian businesses and consumers. Our customers, who include individuals, governments, businesses, the financial sector, Electronic Lodgment Network Operators (**ELNOs**), Information Brokers, conveyancers and other firms, transact on property with the most innovative and trusted data and registry service in Australia. We have a deep and strong working relationship with the Victorian Government as our partner in providing services to our end customers

Our operations include the provision of registry and LANDATA® services, the development and provision of new data insights and services and the administration of technology and IT systems on behalf of the State of Victoria.

## VLRS' Modern Slavery Risk

VLRS recognises that modern slavery is an important issue. Preventing our own involvement in modern slavery is part of our commitment to operate a responsible and safe business. The 'Global Slavery Index' 2018, an authoritative global study of modern slavery published by leading non-government organization Walk Free, the Minderoo Foundation (the **Global Slavery Index**),<sup>3</sup> reports that over 40 million people are living in modern slavery across the globe.

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<sup>1</sup> VLRS is one of a group of companies which includes Victorian Land Registry Services Holdings Pty Ltd (ACN 627 986 270) as trustee of Victorian Land Registry Services Holdings Trust (ABN 91 458 812 703); and Victorian Liberty Finco Pty Ltd (ACN 627 986 476) (VLFPL). The VLRS Trust holds a 100% interest in VLFPL which was established in Australia under a Constitution dated 14 August 2018 (as amended). VLFPL is a company limited by shares incorporated in Australia. The principal activity of VLFPL during the year was to provide finance to its parent entity, the VLRS Trust. The matters reported on in this statement apply equally to those entities.

<sup>2</sup> Upon commencement, VLRS' shareholder was First State Super (FSS). Since 1 July 2020, FSS became 'Aware Super' following the merger of FSS and VicSuper.

<sup>3</sup> We note that the Global Slavery Index is referred to in the *Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities*, available at URL: <https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf>.

**Based on our business model and geographical footprint, VLRS believes that our potential to cause, contribute to or be directly linked to modern slavery, including in our supply chain, is overall low.**

We are committed to working with our personnel and supply chain to take active steps to prevent the possibility of our involvement in modern slavery.

## Methodology

VLRS has developed and applied a conventional risk methodology to assess where the inherent modern slavery risks in our operational services and supply chain may potentially exist.

In relation to our operations, we collated data on the various employment arrangements which VLRS has in place to identify any practices within our operations which may be indicative of a heightened risk of modern slavery.

In assessing our supply chain, three categories were applied: quantum of spend, product/service provided and geographic origin. VLRS recognises that the risk of modern slavery practices exists irrespective of VLRS' contractual spend with a supplier. However, consistently with the principle of prioritisation set out in the Commonwealth guidance<sup>4</sup>, VLRS focused on contracts with a value threshold in excess of \$10,000. Using the authoritative guide, Global Slavery Index 2018 prepared by the Walk Free Institute, our remaining vendors were assigned a country risk rating based on the geographical location of their operation. The country risk rating was based on the estimated prevalence of population in modern slavery (victims per 1,000 population) as follows:

Low Risk	Moderate Risk	High Risk
<3 victims per 1,000 people	>3 but <7 victims per 1,000 people	>7 victims per 1,000 people

Each supplier was considered against the sectors in which they operate which we measured against accepted indicia of modern slavery risk.<sup>5</sup> Our tier one supply chain footprint is largely limited to government and government agencies (Australian), technology companies providing hardware, software, data centre and equipment, electronics and electrical products, and services provided by professional services firms, in addition to services for our employees such as office supplies and furniture, promotional materials, hospitality (food and beverages) and facilities operations including security, maintenance and cleaning.

In assessing our supply chain, we engaged external experts to provide support in designing and implementing the risk assessment methodology. Desktop searches to identify any published allegations relating to modern slavery were also undertaken and no allegations of modern slavery in respect of any of VLRS' suppliers were identified.

<sup>4</sup> Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities, available at URL: <https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf>.

<sup>5</sup> Sectors we consider to be high risk are Agriculture, Construction, Electronics and Electrical Products Manufacture, Extractives/Mining and Basic Metal Production, Fishing and Aquaculture, Forestry, Healthcare, Hospitality, Housekeeping/Facilities Operation (including cleaning, pest control and landscaping), Textile and Apparel Manufacturing, Transportation and Warehousing, Security, Cleaning, and Traffic Control. See: Commonwealth of Australia, Hidden in Plain Sight, Final Report of the Inquiry into Establishing a Modern Slavery Act in Australia; US Department of Labor's 2018 List of Goods Produced by Child Labor or Forced Labor; Verite, Strengthening Protections against Trafficking in Persons in Federal and Corporate Supply Chains.

## Direct Operations and Workplace: assessment of risk

**No evidence of modern slavery practices has been identified in our direct operations and in applying our risk methodology to our operations, we concluded that there is a very low risk that our operations have the potential to cause, contribute to or be directly linked to modern slavery.**

VLRS promotes ethical and responsible business practices. VLRS has an Australian-based workforce and the majority of our workers are educated and professional employees. All employees are provided with a written contract clearly outlining pay and hours of work. VLRS has a deep working and reporting relationship with the Victorian government on whose behalf we provide services to the people of Victoria and other stakeholders.

While most (71 per cent) of our workforce are employed directly through VLRS, almost a third (28 per cent) are contractors. These contractors are on long or short-term arrangements. Approximately one per cent of our workforce are casual employees. VLRS has contractual arrangements in place to ensure any contractors undertaking work for VLRS have eligibility to work in Australia.

## Supply Chain: assessment of risk

**In assessing our overall supply chain within the definition of modern slavery and within our direct operations, the analysis concluded that our supply chain risk, overall, is low.**

### Sector analysis

Very few of our suppliers analysed operate in a high-risk sector.<sup>6</sup>

A notable portion of our key suppliers operate in the software and IT consultancy sectors. These sectors are not high-risk by themselves. However, they rely heavily on the usage of electronics which exposes VLRS indirectly to the electrical manufacturing sector.

We have identified that the electrical manufacturing sector requires raw materials including a wide array of metals and minerals, such as copper, aluminium, titanium, gold and other rare earths, giving it an exposure to the higher-risk metals sector. VLRS acknowledges that these natural resources may be extracted in developing and middle-income countries. We have also identified that, as a trend within both the electrical manufacturing sector and metals sector, there is a higher risk of low-skilled work and the work may be hazardous to the health of workers. For these reasons, and others, these sectors which are connected to our supply chain, in an indirect way, are higher risk.

We will monitor the vendors in our supply chain relating to high-risk sectors as we commence more targeted supply chain assurance activities.

<sup>6</sup> For the purposes of risk assessments, we excluded certain other stakeholders associated with our supply chain, notably the various local governments and other agencies with whom we partner to deliver certificates via LANDATA®. These third parties were not analysed as part of the supply chain assessment methodology because VLRS considers that they do not qualify as suppliers. However, given that they are all based in Australia and operate in the public/government sector, VLRS considers them to be low-risk regardless.

## **Geography analysis**

VLRS engages suppliers from within and outside Australia. The majority of VLRS' suppliers are located in Australia. VLRS' engagement of certain suppliers located outside Australia reflects the reality of our digital operating environment and our exposure to the technology industry.

Some of our suppliers do deliver support services outside of the country in which they are incorporated, including in higher-risk geographies.

Unless a supplier was known to operate in a geography presenting a higher risk, we have assumed that they were low risk.

## **Addressing our modern slavery risks**

### **Summary**

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

Over the past year, our focus has been on conducting a modern slavery risk “baselining exercise”, involving the completion of a controls and gaps analysis. We have formulated, and commenced implementing recommendations for uplift, with a view to prioritising higher risk operational and supply chain risks.

Additionally, we have undertaken a controls and gaps analysis exercise in respect of bribery/corruption, recognising that bribery and modern slavery risk are proxy indicators of each other.

VLRS also commenced raising awareness. In the reporting period, VLRS established a Modern Slavery Working Group to undertake preliminary work. The Working Group representatives - a core group from legal, risk, compliance and IT contracts teams - were provided with training around the content and intent of the Modern Slavery Act.

### **Our workplace**

VLRS has a number of internal controls already in place which contribute to the mitigation of risks associated with modern slavery. Below are some of the key activities carried out by VLRS, some directed at our personnel, aimed at addressing the risk of modern slavery in our business.

#### **Recruitment processes**

We undertake extensive pre-employment background checks, including Australian and international criminal history checks, for prospective employees as part of our recruitment process.

#### **Work terms and conditions**

These are clearly outlined in an employee's contract, with some employees having entitlements under the 2016 Victorian Public Service Enterprise Agreement or the Clerk's Award (Private Sector 2010).

#### **Central teams and oversight**

Our risk management, legal, compliance, and people and culture functions are centralised in our business. This structure helps us to apply uniform governance practices across our organisation.

#### **Data Use**

We value and are committed to maintaining high standards of data security and using data in ethical and responsible ways. Our commitment to information privacy and data security, including the prevention of unauthorised transborder data flows, means that the breadth of our international supply chain and potential associated risks is reduced.

## **Related Policies**

Workplace behaviour expectations are outlined in the Code of Conduct for employees, the Appropriate Behaviour in the Workplace, Work Health and Safety, Whistleblower, Gifts Policy, Conflicts of Interest Policy, and Fraud and Corruption policies. These policies underpin all of VLRS' business operations and promote expectations and ethical business practices that mitigate the risk of contributing to modern slavery as well as any other human rights violations in our workplace. These are available on the website and intranet for current employees. These policies are also included in onboarding for new employees and covered through VLRS' on-going training and awareness programs.

## **Our suppliers**

To improve our controls and oversight of our supply chain, key improvement activities over the last year have included the matters set out below. During FY2020, Covid-19 impacted our ability to conduct supplier assurance activities.

### **Whistleblower framework**

VLRS implemented a Whistleblower Policy and a hotline reporting mechanism to enable anonymous reporting. This process facilitates protection for our employees, suppliers, contractors and third parties to report misconduct (as defined in the policy), relating to suspected or actual modern slavery practices or human rights issues.

VLRS' whistleblower framework is crucial to the transparency of our business dealings.

### **Contracting with Third Parties**

We have developed specific modern slavery (and anti-bribery) contractual clauses in our contracting terms. We have developed a risk-based methodology for application of these controls which we will look to continuously refine following implementation.

### **Anti-Bribery Policy**

We recognise that, without corrupt activity (including the acceptance of bribes), many of the conditions which influence or contribute to the spread of modern slavery may be eliminated. We have developed a bespoke anti-bribery policy for our business informed by the anti-bribery risk assessment which we undertook in consultation with independent expert advisers. On implementation, we will seek to engage with key stakeholders to maximise the effect of the policy.

## **Future Mitigation Plans**

### **Supplier assurance**

To support our ongoing relationship with suppliers to improve mutual understanding of modern slavery risk within VLRS operations, VLRS will seek to ensure the enhancement of its assurance processes by:

- establishing/strengthening partnerships with suppliers;
- engaging with higher risk suppliers to ensure there are not factors present which require risk mitigation;
- verifying, where appropriate, the workplace practices among our higher risk vendors by carrying out vendor surveys/questionnaires to identify other relevant triggers of modern slavery risk in our supply chain and/or any risks or breaches;
- recording any findings and remedial actions in the complaints and audit databases; and
- monitoring and responding to any complaints received by customers, suppliers, contractors or third parties, including through the Whistleblower platform.

## **Supplier Code of Conduct**

We have commenced development of a Supplier Code of Conduct and Supplier Declaration which outlines VLRS' expectations relating to ethical, socially responsible and sustainable practices. Once implemented, this Code will support our commitment to developing relationships with business partners, suppliers and contractors whose practices align with our values and responsibilities. We will engage with our suppliers to support the acceptance and understanding of this Code.

## **Supplier Declaration**

VLRS expects suppliers to influence their own supply chain to adopt a fair and ethical approach in their operations.

We believe that a Supplier Declaration would enforce our proposed Supplier Code of Conduct by placing obligations on suppliers to monitor their compliance with our Code, notify of any breaches and take reasonable steps to address, resolve and prevent further breaches of the Code.

## **New Supplier Onboarding Checks**

Whilst we have existing practices in place in relation to supplier selection and due diligence, we will further strengthen and streamline this process by utilising a more structured risk assessment process to determine if suppliers present with any factors that increase their modern slavery risk.

## **Training Program**

One of the most effective controls against modern slavery risks in both our business and supply chain is to raise the awareness of modern slavery across all levels of our business and integrate the practices and learnings into core employee activities. As part of our existing online training program, we have plans to:

- roll out a modern slavery online training course in 2021 to our Modern Slavery Working Committee and other key employees associated with procurement and contracts management, and
- provide training to our employees over the year to educate our broader personnel on the causes and impacts of modern slavery, and how to report suspected abuses.

## **Policy and Procedure Uplift**

As VLRS advances its Environmental, Social, and Corporate Governance (**ESG**) framework, we will continue to apply scrutiny to relevant policies and procedures, and methods of communication of those instruments, to our personnel. We will consider, in particular:

- how to enhance the documentation of 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.

## **Measuring the effectiveness of our actions**

This is VLRS' first modern slavery statement. In the years ahead, we will look at what we have done and assess our progress, developing appropriate metrics which will assess the performance of our modern slavery program. The metrics developed will focus on assisting us to understand our modern slavery risk profile and the effectiveness of our controls in managing our modern slavery risk exposure.

## **Consultation**

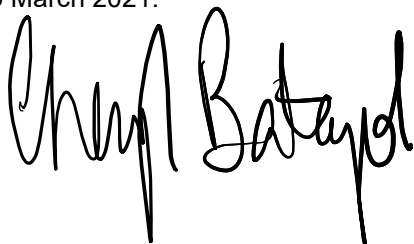
The contents of this Statement were reviewed and approved by VLRS' Senior Leadership Team and Board of Directors in March 2021.

In addition, VLRS engaged external experts to assist in our understanding of the obligations under the MSA legislation and support our modern slavery risk assessment. In future years, we will consider ways

of partnering with our suppliers, commencing with our material suppliers, to assist with reporting and potential case studies.

## **Approval**

This Statement was reviewed and approved by the Board of the VLRS group of companies on 29 March 2021.

A handwritten signature in black ink, appearing to read "Cheryl Batagol". The signature is written in a cursive, flowing style with some loops and a long tail on the final letter.

**Signed by Cheryl Batagol**

Chair of VLRS

30 March 2021