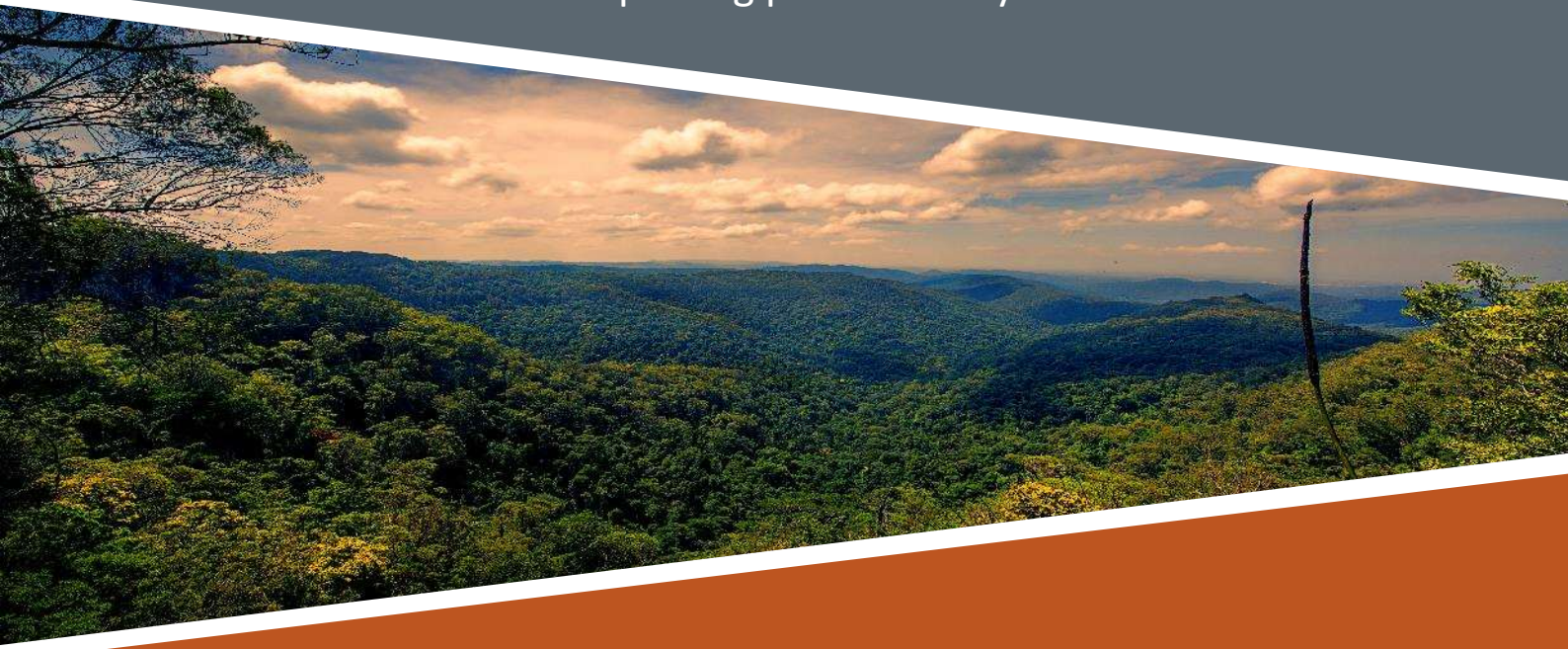




Modern Slavery Statement

Under the Modern Slavery Act 2018 (CTH)
Reporting period: 1 July 2021 to 30 June 2022



This Modern Slavery Statement was approved by the Board of Queensland Titles Registry Pty Limited in their capacity as the principal governing body of Queensland Titles Registry Pty Limited on 20 December 2022.

Pursuant to the requirements of the *Modern Slavery Act 2018* (Cth), the contents of this Statement have been reviewed and confirmed as accurate by a duly authorised person.

The Board has delegated the authority to the Acting Chief Executive Officer to sign this Modern Slavery Statement on behalf of Queensland Titles Registry Pty Limited

A handwritten signature in blue ink, appearing to read 'C. Hall', with a horizontal line underneath.

Cameron Hall
Acting Chief Executive Officer
December 2022

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Part 1: Mandatory reporting requirements – General entity information

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (the **Act**) for the reporting period ending 30 June 2022.

This is the inaugural Modern Slavery Statement lodged on behalf of the recently formed Titles Queensland corporation and reports on our initial steps to assess and address modern slavery in our operations and supply chains.

Identification of Reporting Entity and Structure

The reporting entity, for the purposes of the Act is **Queensland Titles Registry Pty Ltd (t/a Titles Queensland)** - ABN 23 648 568 101 (“**Titles Queensland**”).

On 18 June 2021, pursuant to the *Queensland Future Fund (Titles Registry) Act 2021* and the Transfer Notice issued by the Treasurer and Minister of Trade and Investment published in the Queensland Government Gazette on 8 June 2021, all of the State's rights, title and interest in and to, and obligations and liabilities (including contingent rights, obligations and liabilities) howsoever arising in relation to, the land titles registry were transferred from the State to the new established Titles Queensland corporation.

Titles Queensland is 100% owned by the Registry Hold Trust ABN 49 294 162 680 (“**Registry Hold Trust**”). Registry Hold Trust is a non-operational investment vehicle that does not record a consolidated revenue and does not have any form of operations, supply contracts or employees. The Registry Hold Trust is not required to prepare financial statements under the *Corporations Act 2001* (Cth).

Operations

Titles Queensland is the operator of land and water registry services in Queensland. Services are provided to a range of customers including individuals, corporations, and state bodies.

To facilitate the provision of registry services, Titles Queensland collects lodgement and search fees.

To support our functions, during the reporting period we employed a total of 185 staff. Approximately three quarters of our staff are engaged in operational roles and the remaining staff are engaged in professional roles, such as human resources, finance, IT or executive roles.

Approximately 83% of our staff are permanent, 8% are fixed term employees and 9% of our staff are independent contractors or sourced via third party.

Titles Queensland is head quartered in Brisbane with regional offices located in Nambour, Robina, Rockhampton and Townsville.

Supply Chains

Titles Queensland has a relatively limited supply chain, which in part reflects the recency of our formation and nature of our operations. During the reporting period, we engaged with a total of 136 direct suppliers to support our business operations.

These suppliers provided the following types of goods and services: computer related services, office leasing, postal and telecommunication services, financial and business services, education and training providers, office equipment, corporate and professional membership bodies, government services, corporate catering, health and medical services and professional services including legal and accounting services.

Approximately 97% of our direct suppliers are located in Australia. International suppliers account for the remaining 3% of our direct supplier base and are located in Singapore, the United Kingdom and the USA.

Part 2 - Assessing and addressing modern slavery risk

No actual or suspected incidences of modern slavery were identified in our operations and supply chains during the reporting period. Our overall modern slavery risk profile, including the risk exposure of our key direct suppliers, has been assessed as low.

Risks of Modern Slavery in our Supply Chain

As part of our initial approach to modern slavery due diligence, Titles Queensland has engaged an external consultant to undertake a proprietary risk assessment of our supply chains for the subject reporting period. This risk assessment analysed a total of 136 of our direct (first tier) suppliers.

This risk assessment used proprietary technology to assess the interaction between the following range of factors to assess potential exposure to modern slavery to the tenth tier of our supply chain:

- total supplier spend amount (i.e. the value of our direct supplier contracts);
- industry category including industries that, in turn, are input into particular categories further down the supply chain;
- geographical area of operation; and
- depth of tiering within the supply chain e.g., 3rd tier supplier or 5th tier supplier

A summary of the proprietary risk assessment methodology is set out in the Appendix.

The risk assessment has identified that the most elevated potential risks of modern slavery do not arise until at least the third tier of our supply chains (i.e. our supplier's suppliers). We recognise that, in practical terms, this reduces our level of commercial leverage to directly affect positive anti-slavery measures where the assessed risk is most concentrated. We accept that such an assessment does not eliminate the ongoing need for targeted supplier due diligence as part of our overall response to modern slavery.

The assessment also identified the following industry categories in our supply chains as having potentially elevated risks:

- Australian Construction services; and
- Australian Business services.

Australian Construction Services

As part of establishing our organisation, Titles Queensland has engaged the use of various refurbishment and construction related suppliers to complete new office fit outs and the like. Our engagement of these services may present as a potential source of elevated modern slavery risk, given the possible nexus between this industry and vulnerable workers. We also recognise that the manufacture of office furniture typically occurs in higher risk geographies and that the global supply chains for key product inputs is often complex and opaque.

Should future operations require Titles Queensland to upgrade or refurbish our office spaces, we intend to integrate modern slavery considerations into our selection of suppliers to address the concerns identified above.

Australian Business Services

The second major industry category that has been identified as having potentially elevated risks by the proprietary assessment is Business Services in Australia. This category includes a broad range of our suppliers, from smaller professional consultants to large multi-disciplinary reporting entities.

Given the nature of these suppliers, we understand that the risks of modern slavery are very unlikely to be occurring in the direct operations of our business services suppliers. Rather, this industry category was identified due to the extensive reliance on supply chain inputs with inherently elevated risks – i.e. computers and electronic devices. Titles Queensland recognises that electronics type products are often assembled in high-risk countries, such as Malaysia that are widely recognised as using forced labour within the electronics manufacturing sector.

Titles Queensland intends to focus on suppliers in this category as part of future supplier due diligence and supplier screening processes. We will also continue to monitor our own procurement of electronics related devices, in recognition that we are also exposed to these same risks.

Risks of Modern Slavery in our Operations

Titles Queensland, as a professional services provider is considered to have a very low operational risk within our direct workforce. We have in place adequate controls such as using direct employment contracts with all employees, engaging educated and professionally skilled employees within Australia and strictly abiding by all employment related legislation and regulations.

Nevertheless, we recognise that our operation within physical office spaces provides us with exposure to possible modern slavery risks, in the form of our use of cleaning services and security services. These industries, while common place, are recognised to use workers that are more vulnerable to deceptive recruitment practices and bonded or forced labour. This vulnerability stems from factors such as migrant status, lower levels of English, and the use of employment models such as subcontracting workers to shroud working conditions.

We will continue to monitor any suppliers that we engage in these identified categories during future reporting periods.

Modern Slavery Risk Assessment

With this being our first reporting period, our long-term approach for identifying and responding to modern slavery risk in our operations and supply chains remains under development. We recognise that a key foundational step for any long-term approach is obtaining greater visibility over our risk exposure using objective data sources.

We plan to use the findings of the proprietary risk assessment to tailor and direct our future approach to supplier due diligence, including targeted direct supplier engagement.

Internal Governance and Policies

As part of our early approach to establishing proper frameworks for assessing and addressing modern slavery in future reporting periods, Titles Queensland has focused on developing and operationalising key policies. Both our modern slavery policy and our whistle blower policy were initially approved by our Board at its inaugural meeting on 17 June 2021, prior to the commencement of the reporting period. This occurred as a first order of priority, reflecting our early commitment to adopting appropriate governance systems. Both policies have been reviewed and updated during the reporting period.

Titles Queensland has also commenced drafting a Supplier Code of Conduct during the reporting period, which embeds modern slavery related expectations for suppliers. We anticipate finalising and rolling out this policy in the next reporting period and will include further details on its scope and operation in our next statement.

Modern Slavery Policy

Our Modern Slavery Policy formalises our zero tolerance of all forms of modern slavery, and establishes the following commitments, which we will continue to enact throughout future reporting periods:

- The policy codifies the guiding principles of Titles Queensland's approach to engaging with modern slavery issues, namely that we strive for continuous improvement and effecting change on a long-term basis.
- The policy details the controls embedded in our organisation to prevent modern slavery, both within our own workforce and in our engagements with suppliers. Specifically, the policy establishes the expectations for our staff to be evaluating supplier risks throughout the procurement lifecycle, by assessing supplier risk exposure and due diligence efforts.
- Employees have the responsibility to report any potential instances of modern slavery and cooperate with all related investigations.
- The policy establishes the proper reporting channels for receiving reports of modern slavery and sets out a commitment to establishing a modern slavery steering committee to respond to any breaches of the policy.
- The policy sets out our modern slavery remediation framework, guided by the UN Guiding Principles on Business and Human Rights, of tailoring responses to account for whether Titles Queensland has *caused*, *contributed*, or is *directly linked* to the instance of modern slavery. The policy sets out the requirement for formal remediation plans to be developed, with consultation with external bodies or international organisations where required.

Whistle blower Policy

Our Whistle blower policy sets out our overall approach to receiving and responding to grievances.

The policy extends to a range of internal stakeholders, such as our Board of directors and employees, but also enables reports from external stakeholders including our service providers, employees of our service providers and relevant relatives of these stakeholder groups.

Under the policy, any of these identified stakeholders can make reports in relation to serious illegal conduct or offences against the Commonwealth, which extends to all types of modern slavery related offences.

The policy provides details of our free and anonymous reporting channels and an overview of how Titles Queensland will respond, investigate and protect stakeholders that make disclosures.

Since the inception of our whistle blower policy, Titles Queensland has not received any reports of actual or suspected instances of modern slavery. However, we recognise that an absence of reports does not mean that we are not exposed to risks of modern slavery within our operations and supply chains. On that basis, we plan to incorporate express modern slavery provisions within our formal policy review scheduled for June 2023, to ensure the policy is practical and accessible for the workers that it is designed to assist.

Training and Education

Another feature of our initial approach to addressing modern slavery has been to educate our staff and raise awareness of modern slavery.

Titles Queensland has issued an online training module, developed by our external consultants, to all staff that have procurement related functions¹. This training module covers the following key concepts:

- An introduction to Australian modern slavery reporting context and obligations of a reporting entity under the Act.
- Detailed explanation of actions that an organisation and its employees can take to identify risk, including modern slavery red flag indicator.
- Guidance for procurement staff in providing practical tips for addressing modern slavery as part of supplier engagement processes.
- An explanation of best practice approaches to remediation and how employees should respond to instances of modern slavery that they may identify in the operations or supply chains of a business.
- An overview of hot topics such as the link between forced labour and the supply chain of clean energy and the financial typologies of modern slavery.

Supplier Screening

Titles Queensland has commenced the process of developing an initial set of ESG related questions for integration into our request for proposals (“**RFP**”), as a means of assessing prospective suppliers prior to engagement.

Within this framework, we will include a specific set of questions directed at evaluating the prospective supplier’s approach towards managing modern slavery risks.

We will finalise this RFP screening process in the next reporting period and focus on rolling it out in relation to suppliers within the potentially elevated risk categories identified in the initial risk assessment described above.

¹ This occurred after 30 June 2022, prior to lodgement of this statement.

Part 3 - Measuring effectiveness, consultation, and other information

Titles Queensland recognises the need for continued monitoring and assessment of our year-on-year response to modern slavery, to determine whether our resources are being used in effective and impactful ways. We acknowledge the expectation that entities demonstrate a continuous improvement approach to their overall modern slavery response.

We plan to measure our effectiveness over consecutive reporting periods against clear and specific commitments. Our intended action areas for the next two reporting periods include:

Pillar	KPI Action Areas for FY2023 and FY2024
<i>Risk Identification</i>	Continued supply chain mapping.
<i>Supplier Engagement</i>	Implementing a modern slavery component into supplier onboarding programs.
<i>Due Diligence</i>	Embedding modern slavery considerations into procurement procedures to inform purchasing decisions, including finalising our modern slavery RFP questions. Integrating modern slavery as a formal risk as part of our risk register
<i>Internal Governance & policy Frameworks</i>	Finalising our draft Supplier Code of Conduct and rolling it out Update of Whistle blower policy to include modern slavery specific clauses.
<i>Training</i>	Facilitating targeted training for our Board and Executives.
<i>Remediation</i>	Respond to any instances of modern slavery identified and implementation of appropriate corrective action, in accordance with the remediation principles set out in our <i>Modern Slavery Standard</i> .

Titles Queensland does not own or control any entities. As part of preparing this statement, members of our executive team have engaged with an external subject matter expert.

Appendix – Initial risk assessment methodology summary

As discussed in Part 2 of this Statement, we engaged with an external subject matter expert to carry out a comprehensive risk assessment in relation to certain suppliers. This baseline exercise provides the basis for our subsequent focus for ongoing due diligence and remediation activities across not only the present reporting period but for upcoming years.

Incorporating company spend data throughout global markets, we have utilised external consultants with proprietary technology to trace the economic inputs required to produce products and services from Tier 1 suppliers to Tier 2 suppliers, Tier 2 suppliers to Tier 3 suppliers, and so on, all the way to Tier 10 suppliers of the supply chain of Titles Queensland's top suppliers by spend.

This supply chain mapping was performed using a balanced, global Multi-Regional Input-Output (MRIO) table which links supply chain data from 190 countries, and in relation to 15,909 industry sectors. This MRIO table is assembled using the following sources:

- a) The United Nations' (UN) System of National Accounts;
- b) UN COMTRADE databases;
- c) Eurostat databases;
- d) The Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and
- e) Numerous National Agencies including the Australian Bureau of Statistics.

The MRIO is then examined against the following international standards:

- a) The UN Guiding Principles on Business and Human Rights;
- b) The Global Slavery Index;
- c) International Labour Organisation (ILO) Global Estimates of Modern Slavery; and
- d) The United States' Reports on International Child Labour and Forced Labour.

A proprietary algorithm has then been applied to synthesise publicly available risk data against the exclusively licensed MRIO table. The result of this process is the creation of a modern slavery risk profile to Tier 10 for each supplier.

This analysis was performed for the purposes of risk identification under the Act. It does not purport to confirm the actual existence (or non-existence) of slavery in Titles Queensland' supply chains and operations. Analysis was undertaken at the industry and country level. It does not account for variances at the entity, region or product level.

The multi-faceted approach to modern slavery risk assessment that we have undertaken has included examination and analysis of the following:

- a) The individual suppliers and industries with the most elevated risk of modern slavery;
- b) Supply chain plots to provide a visual representation of the supply chains for Titles Queensland's top 3 first tier industries;
- c) Plotting the relative slavery risk in the supply chain by tier, up to tier 10;
- d) Geographical depiction of the cumulative risk of modern slavery across the supply chain around the world;
- e) An overview of the classification of the first tier of our supply chain by country and industry, including relative modern slavery risk; and

- f) Suppliers in our supply chains and operations that posed any calculated risks in relation to modern slavery were identified.