



**Titles**  
QUEENSLAND



# Joint Modern Slavery Statement

1 JULY 2024 TO 30 JUNE 2025

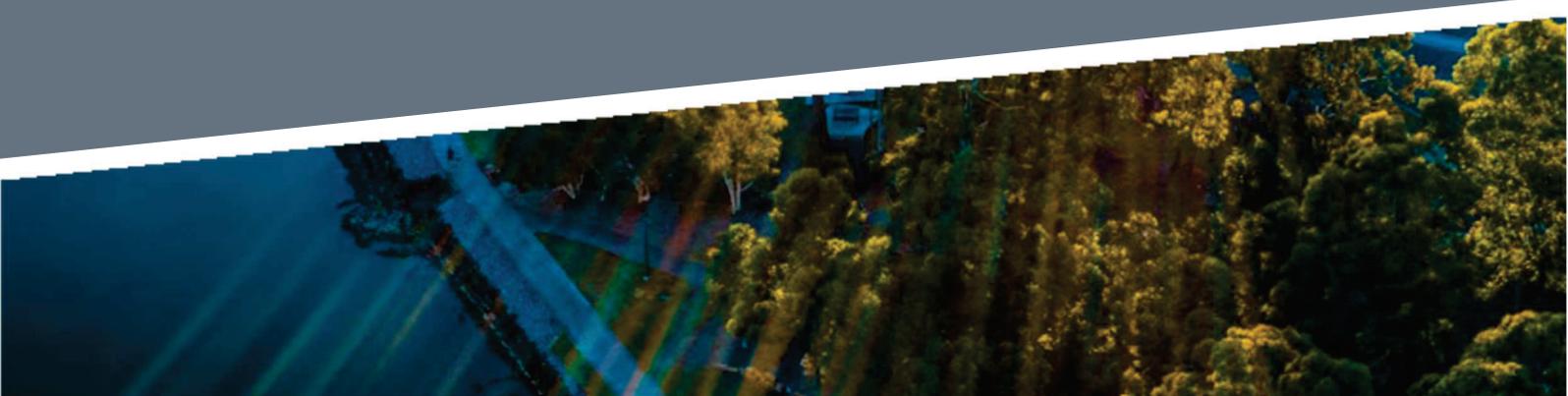
## REPORTING ENTITIES:

QFF Registry No.1 Pty Ltd (ABN 34 647 902 314)

as Trustee for the Registry Hold Trust (ABN 49 294 162 680)

Queensland Titles Registry Pty Ltd (ABN 23 648 568 101)

Registry Finance Pty Ltd (ABN 77 645 947 226)



## Principal Governing Body Approval

The Boards of Queensland Titles Registry Pty Ltd, Registry Finance Pty Ltd and QFF Registry No.1 Pty Ltd as Trustee for the Registry Hold Trust, approved this Statement as the principal governing body of the reporting entities under the *Modern Slavery Act 2018* (Cth) on 4 December 2025.

The contents of this Statement have been reviewed, confirmed as accurate, and signed by John Humphrey in their role as Chair of Queensland Titles Registry Pty Ltd

and QFF Registry No.1 Pty Ltd, and Carolyn Martin in their role as Non-Executive Director of Registry Finance Pty Ltd (duly authorised persons under the *Modern Slavery Act 2018* (Cth)).

The contents of this Statement have been reviewed, confirmed as accurate, and signed by Nikki Allder as Chief Executive Officer of Queensland Titles Registry Pty Ltd, Registry Finance Pty Ltd and QFF Registry No.1 Pty Ltd as Trustee for the Registry Hold Trust.



**John Humphrey**  
Chair  
Titles Queensland

4 December 2025



**Carolyn Martin**  
Non-Executive Director  
Titles Queensland

4 December 2025



**Nikki Allder**  
Chief Executive Officer  
Titles Queensland

4 December 2025

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In the spirit of reconciliation Titles Queensland acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea, and community.

We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.



# 1.0

## Our operations, supply chains and structure

This is the FY25 Joint Statement<sup>1</sup> under the *Modern Slavery Act 2018* (Cth) for:

- QFF Registry No.1 Pty Ltd (ABN 34 647 902 314) as Trustee for the Registry Hold Trust (ABN 49 294 162 680) (“Registry Hold Trust”)
- Queensland Titles Registry Pty Ltd— ABN 23 648 568 101 (“Queensland Titles Registry”)
- Registry Finance Pty Ltd— ABN 77 645 947 226 (“Registry Finance”)

(referred to collectively throughout this Statement as “Titles Queensland”, “we” and “our”. Individual reporting entities are separately referred to as appropriate).

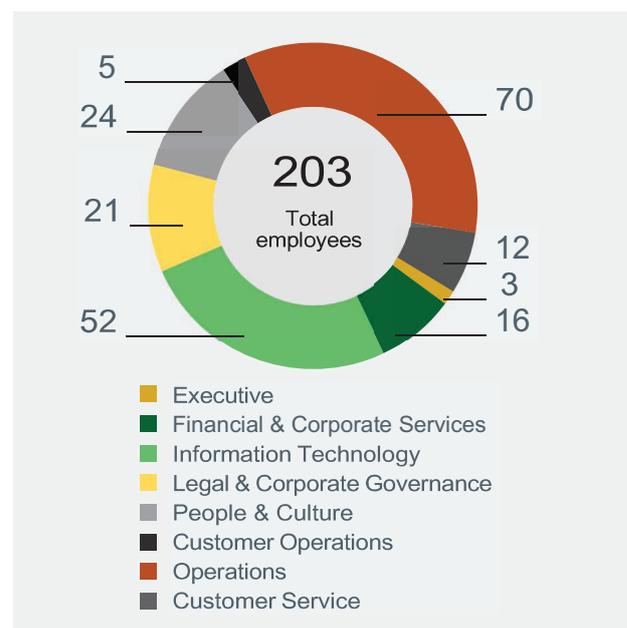
Titles Queensland operates the land and water registry services throughout Queensland. Titles Queensland collects payment from its customers (individuals, corporations, and state bodies) through search and property transfer-related fees.

Our head office is in Brisbane, with regional offices in Robina and Townsville. We also have a records warehouse in Stafford (Brisbane). Some of our employees work remotely and periodically attend our offices for in-person company events.

We employed 212 staff during FY25. Over 90% of our team are employed on a full-time basis, with the balance in fixed-term or part-time positions.

Titles Queensland engaged 7 contracted positions this reporting period (a reduction from 15 last financial year).

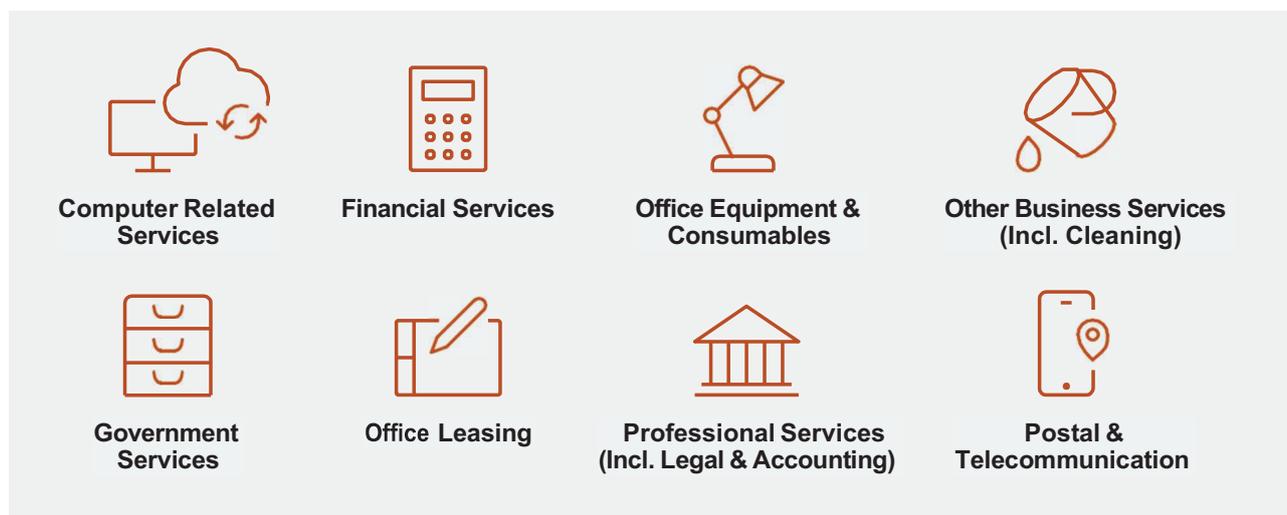
Almost half of our team are engaged in operational roles relating to the core services we provide to our customers. Other key professional roles include executive positions, finance, human resources, and information technology. A more detailed breakdown of the Titles Queensland workforce is outlined in the following chart:



<sup>1</sup> All numbers, statistics and facts described in this Statement are as of 30 June 2025, unless otherwise stated.

## Supply Chains

Our procurement activity is consistent across reporting periods, with Titles Queensland engaging a total of 201 direct and unique suppliers during FY25 (compared to 200 last year). These companies provide products and services that facilitate our day-to-day business activities. Key Australian sectors that continue to represent major components of our year-on-year procurement activity include:



As reported in previous Statements, the vast majority of our direct suppliers (approximately 95%) are Australian companies.

An overview of international suppliers is outlined in the following Table:

Location	No.		Percentage		Industry category
	FY24	FY25	FY24	FY25	
United States	6	7	3.0%	3.5%	Computer related services and financial
United Kingdom	1	1	0.5%	0.5%	Accounting software provider
New Zealand	1	1	0.5%	0.5%	Computer related services
Singapore	0	1	0.0%	0.5%	Financial services
Netherlands	0	1	0.0%	0.5%	Business services
<b>Total International</b>	<b>9</b>	<b>11</b>	<b>4.5%</b>	<b>5.5%</b>	
<b>Total Suppliers</b>	<b>200</b>	<b>201</b>			

Titles Queensland first-tier suppliers, by geography



## Corporate structure and relationship between individual reporting entities

### Registry Hold Trust:

- A non-operational holding entity that wholly owns Queensland Titles Registry and Registry Finance.
- Does not employ any staff or engage any suppliers.
- The principal governing body is the Board of Directors of QFF Registry No.1 Pty Ltd as the Trustee.

### Queensland Titles Registry:

- Primary entity for customer-facing operations.
- Holds all of the State of Queensland’s rights, title and interests in and to, obligations and liabilities (including contingent rights, obligations and liabilities) in relation to the land titles registry.
- Common principal governing body (Board of Directors) with Registry Hold Trust.

### Registry Finance:

- Maintains ongoing funding to the other reporting entities.
- Does not employ any staff or engage suppliers.
- The Board of Registry Finance is comprised of two Directors; both these Directors also sit on the Board of Queensland Titles Registry and QFF Registry No. 1 Pty Ltd.

All entities in the Titles Queensland Group have been consulted in the preparation of this Joint Statement.

# 2.0

## Our approach to modern slavery risk identification, assessment and mitigation

### Operations

Titles Queensland continues to assess a very low risk for any form of modern slavery practice in our direct operations. Our services are exclusively provided within a single Australian state, in urban areas, and with a workforce overwhelmingly comprised of directly employed, highly skilled professionals. Team members are engaged under written contracts with strict adherence to full protections under Australian employment and workplace laws. The small number of temporary positions are skilled roles filled by applicants who do not have common characteristics for potentially vulnerable individuals engaged in non-permanent work (such as migrant workers with visa-status tied to employment).

### Supply Chains

The highest potential risks (in relative terms to our overall procurement profile) continue to be assessed in the Australian sectors of **Business Services, Public Administration Services** and **Computer-Related Services**. This assessed risk is almost universally attributable to the prevalence of computers and other advanced digital products.

The incredibly complex networks of international supply chains for electronics include elevated risks, such as:

- Forced labour during manufacturing and assembly stages, which often occurs in high-risk locations such as China and Malaysia.
- Child exploitation, debt bondage and other forced labour practices in connection with the mining, extraction, and refinement of essential raw materials such as cobalt and lithium.

However, the risk is controlled through the use of reputable suppliers with established anti-slavery protocols.

As is common to all businesses with commercial premises, the engagement of professional cleaning, security, and facilities management services for our registry and office premises has direct connections to potentially elevated modern slavery risk. Industry characteristics that create increased workforce vulnerability include a relatively higher incidence of deceptive and predatory recruitment, bonded or forced labour practices.

To ensure that our risk assessment processes provide us with an increasingly detailed and longer-term picture of potential areas of elevated modern slavery risk, our longstanding partnership with external consultants for ongoing and updated proprietary supply chain risk assessment continued this year.

## 2.0 OUR APPROACH TO MODERN SLAVERY RISK IDENTIFICATION, ASSESSMENT AND MITIGATION (CONT)

This comprehensive and multi-tiered analysis of our procurement data provides a key foundation, on industry category/location basis, from which we can refine, target and improve our due diligence actions.<sup>2</sup>

### **No actual or suspected incidences of modern slavery were identified in our operations and supply chains during the reporting period.**

Given the nature of our core operations and associated essential procurement activities, we consider our overall modern slavery risk profile, including the risk exposure in direct suppliers, to remain low.

## Policy and Governance

In last year's Statement, we described the internal capacity building undertaken to significantly bolster and focus our anti-slavery response, including through the creation and designation of new key positions. Our Head of Risk and Compliance continues to have day-to-day responsibility for the implementation of our overall risk mitigation framework.

Our Board, principally through the oversight of the Finance, Audit and Risk Management Committee, continues to have ultimate responsibility and oversight over our anti-slavery response and annual reporting.

A further significant internal governance action that occurred late in the reporting period was the formal establishment (and inaugural meeting) of Titles Queensland's **Modern Slavery Working Group**. Moving forward, this Group is intended to bring greater collective responsibility and formal oversight towards the continuous improvement of all aspects of our modern slavery risk identification, assessment and mitigation.

Our suite of established policies and procedures continues to be implemented and were updated, as part of regular periodic review. These include:

- **Whistleblower Policy** – contains specific coverage for raising concerns and complaints relating to modern slavery issues. Establishes the approach to be taken for managing, investigating and resolving reports. Our Whistleblower Policy is supported by a third-party hotline service facilitated by Deloitte (last updated in June 2025).
- **Modern Slavery Standard** – this foundational document sets out our overarching commitment to identifying, assessing and addressing modern slavery issues (last updated in October 2024).
- **Procurement Policy (and Checklist)** – although covering a broad range of purchasing issues beyond modern slavery, a key requirement of the Policy is for all suppliers assessed as medium or high risk to undergo modern slavery due diligence before onboarding and contracting, annually and at renewal or extension (refreshed January 2025). The Checklist is a practical tool that helps to ensure our procurement team members follow applicable steps for modern slavery checks.

Our **Supplier Code of Conduct** was also published towards the end of the reporting period. It outlines our expectations for supplier conduct, including responding to modern slavery risks and undertaking appropriate due diligence.

Titles Queensland has also developed a simplified internal guidance document that provides a plain English explanation of our modern slavery due diligence processes and considerations; designed to maximise practical application of risk mitigation actions by all relevant team members throughout our operations.<sup>3</sup>

<sup>2</sup> The risk assessment involves proprietary analysis of over 35,000 local industries categories, which represents more than 98% of global GDP. The MRIO (multi-regional input-output) is regularly updated and draws from the most comprehensive and credible global data inputs available, including the United Nations' (UN) System of National Accounts; UN COMTRADE databases; Eurostat databases; the Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and official statistical data from many national agencies worldwide, including the Australian Bureau of Statistics.

The synthesis of global economic supply chain data is overlaid, via a proprietary algorithm, with the best available research and estimates of modern slavery incidences at the national and industry levels, including the Walk Free Foundation's Global Slavery Index; the International Labor Organization's Global Estimates of Modern Slavery; official reports published by the United States on International Child Labour, Forced Labour and Human Trafficking, and our consultant's internally developed database of modern slavery risk factors by country and sector.

<sup>3</sup> This document was implemented on 1 July 2025, immediately following the conclusion of the reporting period.

### Continued capacity building and internal training

Titles Queensland provides all staff with ongoing access to a modern slavery online training module. Annual completion of this training is a requirement for all staff with procurement-related functions. At the conclusion of the reporting period, 98% of these team members had completed the module.

We also provide advanced training (developed by our long-term external consultants) on financial detection of modern slavery risks. This specialist module is aimed at our Board, Finance, Procurement, Compliance, Risk and select Legal team members. At the conclusion of the reporting period, 100% of these team members had completed the advanced module.

### Ongoing supplier engagement and due diligence

With key developments that we described in last year's Statement now fully implemented under our Procurement Policy, it is now business-as-usual for modern slavery-related due diligence to occur throughout the procurement lifecycle, including before new supplier onboarding, on an annual basis, and prior to renewing or extending the initial contract period.

Modern slavery disclosure is initially sought from prospective suppliers through our standard forms: 'Request for Quote' and 'Request for Proposal'. For example, demonstrated compliance with the Act is a minimum contracting condition, and provision is made for disclosure of supporting documents and evidence.

The implementation of detailed contractual obligations that expressly address modern slavery issues down the supply chain continues to be considered an important part of Titles Queensland's overall modern slavery response. To ensure that this operating principle is being effectively implemented through day-to-day procurement activity, Titles Queensland undertook an internal review of fifteen (15) procurement contracts that were executed during the reporting period. Overall inclusion of appropriate clauses was assessed to be at an acceptably high level.

# 3.0

## Measuring effectiveness and continual improvement

Titles Queensland considers that demonstrating continuity across successive reporting periods between planned and completed actions is an important yardstick for effectiveness.

Consistent with our approach in previous years, the following table provides a progress update on Key Focus Areas described in last year's Statement:

Key Focus Area	Detail	Status
<b>Due Diligence</b>	Embedding modern slavery considerations into procurement procedures and checklists to inform purchasing decisions, including finalising our modern slavery RFP questions and implementation of a new "spot checking" tool allowing for quick assessment of new suppliers.	
<b>Establish Modern Slavery Working Group (MSWG)</b>	Formal establishment (and inaugural meeting) of <b>Titles Queensland's MSWG</b> . Moving forward, the Working Group is intended to bring greater collective responsibility and formal oversight towards the continuous improvement of all aspects of our modern slavery risk identification, assessment and control. and procedural alignment.	
<b>Raising Awareness about Whistle Blower facilities</b>	<ul style="list-style-type: none"><li>Plain-English poster, reporting on modern slavery practices, was displayed throughout our office spaces in FY25</li><li>Whistleblower Tile on Titles Queensland's intranet was added early in FY26.</li></ul>	
<b>Supplier Requirements</b>	<ul style="list-style-type: none"><li>Modern Slavery disclosure sought from prospective suppliers through 'Request for Quote' (RFQ) and 'Request for Proposal' (RFP)</li><li>Demonstrated compliance with the Act is a minimum contracting condition for Suppliers</li><li>Public Facing Supplier Code of Conduct published</li><li>Attestation and certification approaches assessed, with TQ determining that undertakings made in RFQ/RFP documentation suffice</li></ul>	

## Continual Improvement

The Modern Slavery Framework, including risk management and controls, is subject to ongoing review and improvement. This process of continual improvement for modern slavery risk is championed by Finance and Corporate Services and undertaken by the various Titles Queensland functions.

This process includes an annual review, and non-scheduled reviews when regulatory amendments occur, when regulatory action is taken, upon introduction of new practices, when the external context changes, or in response to audit findings.