



Lewis Land Group Modern Slavery Statement FY20

Message from our Chief Executive Officer

When we determined that Lewis Land Group was required to prepare this Modern Slavery Statement, it was confronting to consider that modern slavery could exist in Australia, let alone in connection with our business.

After further reflection, we acknowledge that this legislation is bringing awareness to the victims of exploitation, with thousands in Australia and millions worldwide subject to unjustifiable behaviour for the sake of profit.

As a family business, we value integrity in our relationships and strive to create a safe, inclusive and high-performing environment for our people.

For more than 60 years we have helped shape the residential, retail and recreation experiences of communities across Australia, creating healthy, positive spaces for family, personal growth and connection. These should not be built at the cost of the most vulnerable.

We welcome the *Modern Slavery Act* and acknowledge the call for businesses to take action against modern slavery. We are committed to considering the human rights impacts of our business decisions, both within our immediate operations and beyond, in line with the purpose of the Act. Our challenge is to position our organisation to be proactive and encourage others to be a part of the solution.

Our leadership team is committed to respect and uplift human rights through their conduct and business relationships. As we respond with our first statement, we are building modern slavery considerations into our internal operating procedures and policies. We also value sustainability as a fundamental element of our business conduct and project design. Going forward, we intend to consider modern slavery and human rights impacts as part of our broader sustainability platform.

Matthew McCarron
Chief Executive Officer

Information about our Modern Slavery Statement

This is Lewis Land Group's first Modern Slavery Statement (the 'Statement') covering the financial year from 1 July 2019 to 30 June 2020 ('FY20') published in accordance with the *Modern Slavery Act 2018 (Cth)* (the 'Act').

Lewis Land Holdings Pty Limited (the 'Company') is the parent company of the Lewis Land Group (the 'Group') and the reporting entity pursuant to section 13 of the Act. The Group consists of the Company and its subsidiaries, being all entities over which the Company has control for accounting purposes. The material subsidiaries are listed in the diagram in the next section.

The Statement has been approved by the Board of Directors of the Company on 31 March 2021.

Our structure, operations and supply chains

Founded in 1957, Lewis Land Group is Australia’s oldest private property developer.

Our operations are structured across three operating divisions, being Retail, Development and Leisure, which are coordinated by our Corporate support function. Further details of the operations, relevant subsidiaries and supply chain of each operating division and the support function are included on pages 4–5.

Our operations are solely Australian based (New South Wales, Queensland and South Australia) and our Tier One relationships are with domestic and local suppliers for our goods and services. We recognise that within our Tier Two supply chain and beyond, goods and services will be sourced from international suppliers.



Lewis Land Group



CAPITAL / RETAIL

Legal Entities

Lewis Land Group Pty Ltd (ABN 52 008 524 801)
 Harbour Town Centre Management Pty Ltd (ABN 21 001 302 610)
 Lewis Capital Holdings Pty Ltd (ABN 46 001 327 902)
 Harbour Town Adelaide Unit Trust (ABN 24 701 659 673)
 Sovereign Hills Unit Trust (ABN 69 512 725 485)

Our outdoor retail venues provide outlet and convenience shopping experiences to communities across Australia.

We own and operate three centres:

- Harbour Town Premium Outlets, Gold Coast
- Harbour Town Premium Outlets, Adelaide
- Sovereign Hills Town Centre, Port Macquarie

We employ approximately 30 team members in our Centre Management operations.

Supply chain

We procure ongoing security and cleaning services for all retail assets. Other businesses are engaged for property fit-outs, marketing, legal and other services.



DEVELOPMENTS

Legal Entities

Lewis Land Group Pty Ltd (ABN 52 008 524 801)
 PM Land Pty Ltd (ABN 67 602 713 771)
 Sovereign Hills Sales Pty Ltd (ABN 42 001 110 345)
 Sovereign Hills Project Pty Ltd (ABN 76 003 823 274)

Our longstanding development operations have shaped residential communities stretching along Australia's eastern coastline.

Our active project is:

- Sovereign Hills master-planned community, Port Macquarie NSW

We have a team that manage these developments to ensure that people can enjoy world-class public amenities and the local environment.

Supply chain

In community building, our team outsources design, civil engineering and legal operations to a small pool of suppliers with whom we have had long term relationships.

Lewis Land Group



LEISURE

Legal Entities

Lewis Leisure Holdings Pty Ltd (ABN 52 004 928 465)
Lewis Leisure Trust (ABN 56 346 166 957)

Our family-friendly hotels and pubs are embedded in the heart of the community.

We own and operate four venues:

- The Fiddler, Rouse Hill, NSW
- Camden Valley Inn, Camden, NSW
- The Belvedere, Woody Point, QLD
- Mon Komo Hotel, Redcliffe, QLD

We employ over 400 employees across hospitality and hotel operations.

Supply chain

We prioritise engaging local businesses for our food and general supplies. Beverage products are sourced from large global suppliers. We also have an ongoing relationship with a Sydney recruitment firm who assists us with international recruitment.



CORPORATE

Legal Entities

Lewis Land Holdings Pty Ltd (ABN 68 008 522 496)
Lewis Land Group Pty Ltd (ABN 52 008 524 801)

Our Corporate support team body oversees all of the Lewis Land Group operations and is based in Sydney.

Our core team of approximately 20 team members act as the central communication point across our business functions. Corporate employees are overseen by the Chief Executive Officer, who reports directly to the Board of Directors.

Supply chain

As the central business support unit, Corporate tends to engage financial, professional, property, technology and insurance service providers.

Modern slavery risks in our operations and supply chain

RISKS IN OUR WORKFORCE

We uphold the highest standards of employer obligations and aim to always treat our employees with respect.

We consider the direct operations and workforce in our Capital division, Development division and our Corporate support function to be lower risk with regards to modern slavery practices. These are smaller teams, conducting predominately office based professional level activities, which combined with a robust reporting framework, can reduce the likelihood of exploitation.

We consider risks of modern slavery practices in our Leisure division to be comparably higher due to the size and demographics of the workforce. We have a long-term partnership with a Sydney-based recruitment firm to connect international workers with openings in our hotels, pubs and kitchens. Migrant workers, even with strong English language skills, may not be aware of their rights and entitlements under Australian law or institutions. This lack of exposure could be exploited by malicious individuals to withhold payments or deny requests. They may also be more vulnerable due to debts incurred during the recruitment and visa process.

RISKS IN OUR SUPPLY CHAIN

Whilst we have not yet conducted a comprehensive risk assessment of our supply chain, we recognise that our supplier relationships and procurement activities may be exposed to risks of modern slavery practices.

In our Leisure and Capital divisions, we engage cleaning and security services which we recognise carry higher risks due to the fact that such activities may be carried out during quieter times of the day with less visibility, and due to higher rates of sub-contracting in these industries.

Risks associated with sub-contracting, where we have less oversight of supplier practices and operations, may also be present in our construction projects. This is more relevant for our Development business, where a number of services are outsourced. The Group has long-standing relationships with its partners, however modern slavery is only a recent topic of discussion.

Our procurement philosophy currently prioritises quality of services over the cost. Nonetheless, we recognise the need to include consideration of whether our suppliers' employees are being paid a fair wage and receive access to their entitlements under Australian law.

Finally, we recognise that goods we use to conduct our business could be manufactured overseas in higher risk locations or incorporate higher risk elements in production. Examples include construction machinery, building materials, phones and computers. At present, the Group does not have the oversight to assure no modern slavery occurred at any point in production.

RISKS AND THE COVID-19 PANDEMIC

COVID-19 has had a substantial impact on the retail and leisure sector across the nation.

In response, we temporarily closed our leisure venues and adapted all of our business operations. Our assets have responded to government regulations surrounding capacity limits and updated health hygiene standards to ensure the safety of customers and employees.

For a property owner, the pandemic increased the need for essential services like cleaning and security in some areas, whilst decreasing demand in others. We maintained ongoing engagement with our suppliers during the pandemic in order to minimise risks and impacts on their businesses.

In our Retail division, we worked with tenants to ensure that they were able to endure lockdown periods and reopen in a strong position (where possible) once restrictions had eased. We decided that facing a short-term financial impact in order to help our tenants in the long run was the best course of action.

Assessing and addressing modern slavery risks

Like many Australian businesses we are still learning about the nature of modern slavery and the complexities of managing and responding to this issue.

The events of 2020 meant that our efforts were focused on ensuring the health of our employees and customers, which impacted our capacity to dedicate time and resources to developing a modern slavery program. Nonetheless, during the year we established a Modern Slavery Working Group to develop and implement our modern slavery strategy, manage our various initiatives and ongoing priorities.

We are committed to ongoing activity in this area and have engaged external consultants to help us develop a modern slavery strategy and prioritise a program of works.

Whilst not implemented in response to modern slavery risks, we do have existing systems in place in our Leisure business that may mitigate the risks of exploitation occurring. We utilise an online platform to coordinate employee onboarding, information and scheduling. This program monitors hours worked and issues an alert to managers if employees are working more hours than originally scheduled. In addition, our Human Resources Manager maintains a direct contact line for all Leisure employees, therefore is available to receive formal reports relating to pay discrepancies, personal conflicts or any concerns regarding unethical behaviour.

During our next reporting cycle we believe the following to be our priority focus areas:

- Incorporate modern slavery awareness into the Group onboarding process
- Make enhancements to our reporting procedure to ensure it can respond to any modern slavery concerns and reports
- Engage relevant membership bodies on any upcoming initiatives for an industry response to modern slavery and human trafficking
- Review and update the Group's risk governance framework

Assessing the effectiveness of our actions

As a family-owned private company, we put trust in our employees and business unit heads to address challenges and approach risks and opportunities in a way that aligns with our values.

Our Corporate support team coordinates between divisions and provides advice and guidance when managing emerging risks. We recognise the need to incorporate our new understanding of modern slavery risk into this process.

The first step will be embedding modern slavery governance and internal reporting into our existing processes. We will be establishing regular reporting between the executive and the Board on the implementation of our modern slavery strategy.

At this stage, we assess suppliers based on the quality of services and products delivered. Outside of compliance activities, in the future we will be nurturing our supplier relationships and modern slavery awareness and where appropriate we will:

- Include modern slavery related clauses into new contracts and upcoming contract reviews
- If the supplier is a reporting entity, review their modern slavery statement
- Based on their commitment, develop performance targets with our suppliers.

Consultation

Our Corporate support function facilitates coordination across the Group and has engaged an external consultant to carry out our modern slavery risk assessment for the next reporting period.

Our Corporate support function will ensure key communication channels are able to incorporate modern slavery risk management within reporting. We will be coordinating our ongoing modern slavery strategy while tasking actions to divisional leaders to identify, assess and mitigate modern slavery risk in their operations and supplier relationships.

A key first step will be establishing risk governance and the drivers of our modern slavery strategy.

As a result, our first round of consultations prioritised internal stakeholders in the Capital and Leisure divisions to build up the Group's understanding and accountabilities for modern slavery risk.

For our Developments division, we want to ensure that the Group has a strong understanding of the issue before we engage suppliers.

The modern slavery governance structure will incorporate regular consultation between all divisions.

Close

We understand that responding to modern slavery requires collaboration between government, business and the broader community. Through raising awareness of these issues, businesses are able to have an impact in the community with the hope that this will cause ripple effects across the Australian market.

We are considering how we can use our platform as an employer to raise awareness of modern slavery with our employees more broadly, through highlighting risks and sharing insights and resources to allow our people to make informed decisions as individual consumers.

We are also considering our broader relationships and the impact that the Group can have. We recognise that many of the businesses we work with may not be responding to the Act, or may be unaware of this legislation. Lewis Land Group can play a role in educating our partners on the issue and is open to engaging with them in developing our modern slavery response, acting transparently to assure that our modern slavery risk management is in line with best practice and that our assets do not represent a modern slavery exposure risk.

We acknowledge that the Act provides businesses with autonomy to design their own modern slavery response and we are committed to continual and ongoing improvement in our business operations and supplier relationships.