



MODERN SLAVERY STATEMENT FY24

Leakes Road Rockbank Pty Ltd ABN 93 122 773 924¹

Introduction

Leakes Road Rockbank Pty Ltd (“Woodlea”) acknowledges that slavery still exists in the world today, and that businesses have a role to play in supporting its eradication.

Woodlea does not support or condone acts of modern slavery in any form.

This is Woodlea’s fourth Modern Slavery Statement reporting under the requirements of the Modern Slavery Act 2018 (the “Act”).

1 – Reporting Entity and any other owned or controlled entities

The reporting entity is Leakes Road Rockbank Pty Ltd (“Woodlea”) in its capacity as trustee for the Leakes Road Rockbank Unit Trust. Woodlea does not act as a trustee of any other trusts and does not own or control any other entities.

2 - Description of reporting entity’s structure, operations, and supply chains

Reporting entity and structure

Employing approximately 20 people, Woodlea manages the sales & delivery of a project of the same name in Aintree VIC, encompassing 7,000 residential dwelling lots.

Mirvac Rockbank Pty Ltd & Jayaland Corporation Pty Ltd are each 50% Unitholders in the Leakes Road Rockbank Unit Trust. The Trust business is operated by Woodlea as Trustee through the management committee which comprises of an equal number of Directors from both Mirvac & Jayaland (“Management Committee”).

The Management Committee (currently one Director from each Unitholder) have appointed a Manager (Woodlea Project Director – Matthew Dean) to manage the project on its behalf. The Management Committee is appointed by the Board of directors of Woodlea (“Board”) to manage the Trust Business and the affairs of the Trust on a day-to-day basis in accordance with the

¹ This is the statement to cover Leakes Road Rockbank Pty Ltd as trustee for the Leakes Road Rockbank Unit Trust in which Mirvac Rockbank Pty Ltd and Jayaland Corporation Pty Ltd each own 50% of the Units. It relates to the financial year ended 30 June 2024. This Modern Slavery Statement has been published in accordance with the Modern Slavery Act 2018 (Cth).



Unitholders Agreement and the Woodlea Policies and Procedures Manual, which includes approval of the forms of contracts respect of the development activities on the project.

Woodlea funds its development through a stand-alone construction loan with one of Australia's largest banks, ANZ.

Operations

Woodlea operates one development project, which it acquired in the year 2000 and subsequently develops, and markets residential land in Aintree, Victoria.

Woodlea's strategy is to meet market demand for a mix of products in Melbourne's Western Growth Corridor.

Woodlea is primarily developed for residential purposes however certain aspects of the land holding are set aside for non-residential purposes such as retail, education, commercial and sporting facilities.

Supply chains

Woodlea's supply chain across various stages of planning, approval, development, construction, marketing, and sales processes amounted to a direct spend of approximately \$106 million in FY24 comprising the following main categories listed in descending order of magnitude:

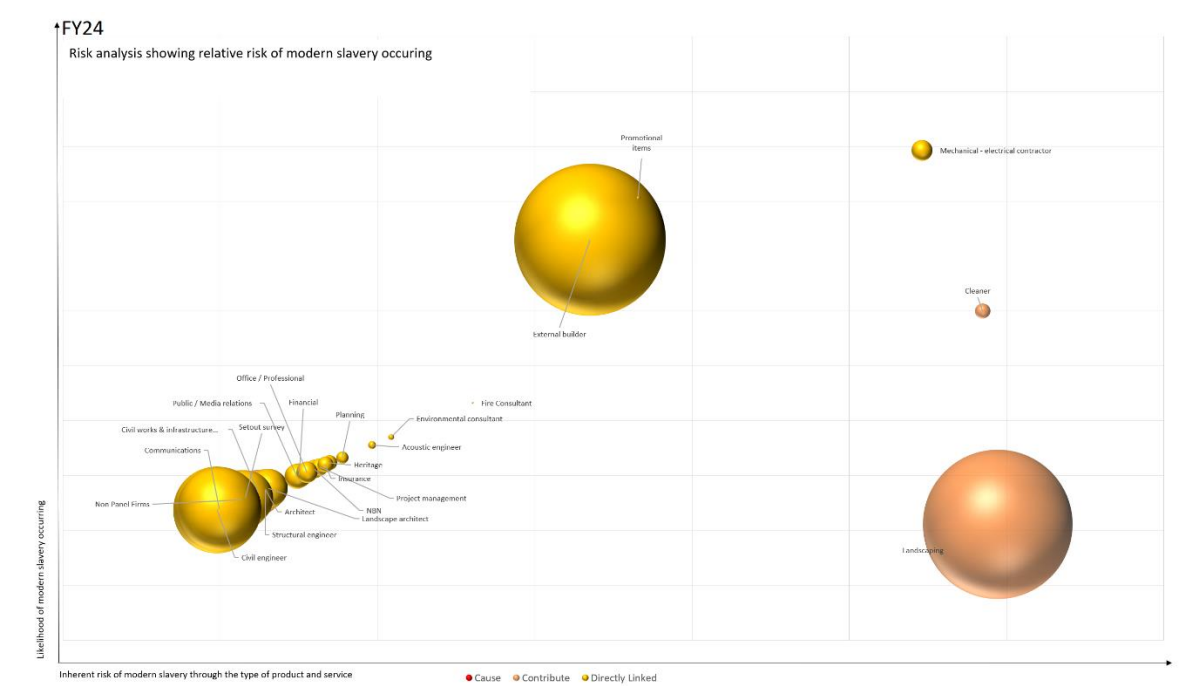
Spend Category	
1	Subcontracted services
2	Head Contractor - external
3	Professional services
4	Marketing
5	Materials supply / supply & install
6	Real estate agents
7	Insurance
8	Office supplies, PPE & postage
9	Information technology & communications
10	Premises
11	Human resources
12	Subscriptions
13	Equipment purchase & rental



3 - Risks of modern slavery practices in the operations and supply chains of the reporting entity

We acknowledge that no sector or country is immune from modern slavery and we understand that entities operating in the Australian residential development sector may be exposed to modern slavery risks through their operations and supply chains. That said, we consider modern slavery risk in our direct operations to be relatively low on account of the workforce being entirely located in Australia and employed in accordance with Australia's well-developed workplace laws.

In FY24, we used the United Nations Guiding Principles on Business and Human Rights (UNGPs) three-part continuum to map our supply chain in order to understand where the highest level of potential risk exposure sits based on geographic origin and spend category. The resultant risk map is displayed below:



Details of the UNGPs three-part continuum of involvement are outlined below;

- **CAUSE:** a business can cause an adverse human rights impact where its actions or omissions directly result in the impact occurring. For example, a construction company could cause modern slavery by exploiting its workers.
- **CONTRIBUTE:** a business can contribute to an adverse human rights impact where its actions or omissions substantially contribute to the impact occurring. This includes acts or omissions that may incentivise or facilitate the impact. For example, a cleaning company could contribute to modern slavery by placing unrealistic cost requirements or timeframes on its subcontractors, which could likely only be met using exploited labour.



- **DIRECTLY LINKED:** a business can be directly linked to modern slavery where it is directly connected to modern slavery through the activities of another entity that it has a business relationship with, such as a sub-supplier. For example, a security company may purchase uniforms for its staff made by a supplier with textiles produced by a third supplier using modern slavery.

We use this continuum to understand how we may be at risk of involvement in modern slavery, as shown in our risk map above. Importantly, we also use this continuum to help us identify how we should respond to potential modern slavery risks, based on our involvement in the risk.

The horizontal axis of the graph above looks at the inherent risks of the industry and product, while the vertical axis shows the likelihood (including geography) of the potential risk. The size of the bubble indicates our relative spend, while the colours indicate whether Woodlea's actions could cause, contribute to, or be directly linked to modern slavery in line with the UN Guiding Principles on Business and Human Rights (UNGPs).

We have identified the top right quartile (comprising "mechanical subcontractors", "promotional items" and "cleaning services") to form the subject matter of a deep dive in FY25 along with continued monitoring of head contractors (domestic residential construction & landscaping) given the inherent risks in their provision of labour.

4 -Actions taken to assess and address these risks, including due diligence and remediation processes

FY24 Actions

The Board through the Management Committee is responsible for overseeing the management of Woodlea's modern slavery risk. Woodlea's employees regularly undertake risk management activities which assists the Board and Management Committee with governance matters for Woodlea, including the active identification of risks and implementation of mitigation measures.

There are a number of policies which support the development and retention of a fair and safe workplace and the objectives or eradication of modern slavery including:

- Woodlea's Policy and Procedures Manual which outlines procurement procedures (including the requirement to tender and evaluate based on considerations outside of price including quality and record of safety);
- Woodlea's Ethics & Conflict of Interest Policy;
- Woodlea's Human Rights Commitment;
- Woodlea Supplier Code of Conduct; and
- Woodlea's Customer Complaints Policy.



As noted in section 3 Woodlea's primary action in relation to modern slavery has been risk mapping its supply chain to understand where risk likely resides.

A summary of actions completed in FY24 are outlined below:

- Modern Slavery Policy and Formal Supplier Code and Human Rights in broad operation and implementation for all procurement. Tender procurement checklist & Q&A also implemented.
- Modern Slavery Working Group met quarterly through FY24, inclusive of marketing, community development and property development teams.
- External Training delivered to all Woodlea staff members by Pillar Two.
- Anonymous Whistleblower hotline was established for all staff and general public to report any potential incidents. Pillar Two to also provided ad hoc support as needed for Woodlea staff.
- OH&S Training, with intersection to Modern Slavery policy, delivered to all Woodlea staff members by Holding Redlich.
- Formal monthly consultation with all tier one suppliers.
- All standard construction contracts and consultant agreements executed include Modern Slavery Clauses as prepared by Mirvac Legal and peer reviewed by Pillar Two.
- Continuation of assessment of supply chain risks.
- Consultation with several major tier one operational suppliers in particular regarding high-risk procurement categories from FY23 mapping specifically "stone & tile supplier" and "joinery categories" in addition to general high risk areas including merchandise, marketing digital rendering, timber supply, stock supply, joinery & PVC pipes.
- Monthly tracking with key suppliers on supply chain risks, despite the low-risk nature of Woodlea's largest areas of procurement investment.

Next Steps

Actions to be completed during the year ended 30 June 2025 include:

- Modern Slavery Working Group to continue meeting formally on a quarterly basis and report to the Management Committee as integrated with risk reporting.
- Refresher training to be provided to all Woodlea staff and detailed training to Modern Slavery Working Group as required in line with recent review, mooted legislative changes and reforms to Modern Slavery Act 2018.
- Review of relevant civil, landscape and building design specifications by Woodlea's design consultants to best mitigate risk from high-risk supply chain areas relating to merchandise, offshore marketing services (eg digital renders), timber supply, stone supply, solar PV cells, joinery & PVC pipes.
- Formal consultation with all tier one suppliers.
- Annual review of standard construction contracts and consultant agreements and bespoke Modern Slavery Clauses (implemented). This will be continuously reviewed to accord with best practice and further updated in line with updates to Formal Supplier Code and



Woodlea Modern Slavery Policy.

- Ongoing consultation with suppliers in particular in the identified “mechanical subcontractors”, “promotional items” and “cleaning services”) high risk categories.
- Monthly tracking with key suppliers on supply chain risks, despite the low risk nature of Woodlea’s largest areas of procurement investment.

Where a risk of modern slavery is identified, Woodlea will strive to work with suppliers in both understanding and educating them in Woodlea’s stance in relation to modern slavery.

5 - Assessing the effectiveness of actions

Woodlea will seek to continue to develop its processes and procedures to better understand and further mitigate against the risks of modern slavery.

Woodlea measures the effectiveness of its actions through:

- Regular reviews of its response to modern slavery, including reviews of its risk assessment procedures, via the Modern Slavery Working Group.
- Being mindful of and managing risks in its supply chain.
- Discussions with peers and suppliers.
- Corporate policy reviews conducted periodically, as required, and overseen by the Board.

6 - Describe the process of consultation with any entities the reporting entity owns or controls

There are no entities owned or controlled by Woodlea requiring consultation on the content of this Statement, however Woodlea has consulted with the Mirvac Group (being one of its Unitholders) which has a well-resourced Modern Slavery Working Group and Group Wide Procurement Policy and Vendor Code of Conduct.

7 - Any other relevant information

Nil.

This statement was approved by the Woodlea Management Committee in its capacity as principal governing body on 5th December 2024.

Peng Hong (Dec 17, 2024 18:09 GMT+11).....

Peng Hong Wong
Management Committee Member

Leakes Road Rockbank Pty Ltd

Sarah Elysa Elizabeth Houlston Anderson (Dec 17, 2024 18:20 GMT+11)

Sarah Elysa Elizabeth Anderson
Management Committee Member

Leakes Road Rockbank Pty Ltd











FY24 Woodlea Modern Slavery Statement

Final Audit Report

2024-12-17

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