

Sunland Group

MODERN SLAVERY STATEMENT

JUNE 2022

THE REPORTING ENTITY

Sunland Group Limited and its wholly owned subsidiaries (“the Group” or “Group”) are a reporting entity under the Modern Slavery Act 2018 (C’th) (“the Act”). Sunland Group Limited is a company incorporated in Australia and is listed on the Australian Securities Exchange. This is a joint report of Sunland Group Limited and its subsidiaries which operate with a centralised management structure.

STRUCTURE, OPERATIONS AND SUPPLY CHAINS

The Group operates a property development business across Queensland, New South Wales and Victoria through its parent company and incorporated subsidiaries. Further information on the material subsidiaries can be found in the Group’s most recent financial statements located on the Group’s [website](#). The Group’s products comprise of:

- Medium-density integrated housing developments
- Land subdivision
- Medium-rise apartments, and
- High-rise developments above 15 storeys and commercial developments

The Group’s in-house operations are conducted by approximately 35 employees and include:

- Land acquisition
- Design
- Project management
- Housing construction, and
- Sales and marketing

Multistorey construction is outsourced to a principal contractor and housing construction is delivered through a core team of Group employees in each state using subcontractors for the housing construction. Other in-house operations are co-ordinated by employees using a combination of internal resources and external consultants.

The Group’s supply chain for multistorey and commercial construction begins with a single supplier, being the principal contractor. The supply chains of the Group’s in-house operations include professional consultants, on site labour, and building material suppliers. The supply chains of both areas of the Group include the manufacturers of the materials, transport services, and wholesalers. Additionally, the administrative operations of the business are supported by services provided to the offices of the Group, including cleaning, security, office supplies and other such goods and services.

RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF THE GROUP

The Group operates solely in Australia where the culture, laws and standards of our society support the rights and freedom of the individuals within our community. Even in this environment, the Group recognises that the risk of modern slavery and exploitation does exist within Australia. The Group has no tolerance for practices that do not respect the rights of individuals. The Group’s approach to the risk assessments and practices described within this report reflects this overall level of risk.

The areas of the Group which are assessed to have a higher risk of modern slavery practices are limited to where our operations may be connected to modern slavery through the activities of suppliers of goods and labour we have a business relationship with. This includes the risk of the Group being supplied unskilled labour (such as on-site labour or cleaners) by its suppliers or materials from its suppliers that are imported from countries where modern slavery practices might exist.

ACTIONS TAKEN BY THE GROUP TO ASSESS AND ADDRESS THOSE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

The Group has a culture that considers modern slavery practices as abhorrent and unacceptable. Our approach to assess and address the risk of modern slavery practices in the supply chain includes:

- A comprehensive employee handbook provided to all staff upon their employment which includes the Group's code of conduct, policies on modern slavery tolerance and reporting, harassment, bullying and discrimination, and workplace health and safety. This serves to set the tone for how the business is conducted.
- A whistle-blower policy available to all staff describing the protected disclosures staff can make; how they can make such disclosures; and how the Group will respond. This reinforces the Group's culture to staff.
- The development of long standing relationships with reputable suppliers to allow the Group to have a greater understanding of the culture and practices of our suppliers to better understand where the risk of modern slavery practices may exist.
- Internal processes for assessing the remuneration of new employees against legal entitlements to ensure new staff are not paid below that to which they are entitled to.
- Annual process for assessing the remuneration of existing employees against legal entitlements to ensure existing staff are not paid below that to which they are entitled to.
- Using labour hire firms with modern slavery policies and practices.
- Ceasing relationships with any suppliers where modern slavery practices are indicated or have been identified.

HOW THE GROUP ASSESSES THE EFFECTIVENESS OF SUCH ACTIONS

The effectiveness of these actions and practices are addressed on a continuous basis with the Group responding where evidence is found that the Group or our suppliers exhibit practices which are inconsistent with our approach to addressing the risk of modern slavery. Evidence brought to our attention by staff, media reports, regulatory agencies or law enforcement must be recorded in a dedicated register. The register includes the following information:

- date reported
- how incident report was received
- nature of matter
- the status of the matter, and
- who is responsible for investigation and developing responses to the specific matter and developing policy responses.

The matter will then be appropriately investigated, reported and actions designed to resolve identified instances of modern slavery practices, and develop policy responses to prevent reoccurrence.

PROCESS OF CONSULTATION WITH ANY ENTITIES THAT THE GROUP OWNS OR CONTROLS

The Group has a centralised management and operational structure which applies to all entities within the scope of this statement. The centralised structure is reflected in all aspects of the Group, including centralised procurement, human resource practices, management decision making, treasury function, policies and procedures. It is on this basis that consultation with any entities that the reporting entity owns or controls and the entity giving the statement inherently occurs. This statement was prepared through engagement with the company secretary, the board of directors, the executive management team and the finance team.

APPROVAL BY THE PRINCIPAL GOVERNING BODY OF THE GROUP

This statement was approved by the Board of Directors of Sunland Group Limited.



Sahba Abedian
Managing Director

15 November 2022