



Modern Slavery Statement

Land Services SA Holding Pty Ltd as trustee for the Land Services SA Holding Trust

1 July 2021 to 30 June 2022



1. MODERN SLAVERY STATEMENT

This Statement was prepared in accordance with the *Modern Slavery Act 2018* (Cth) (the **Modern Slavery Act**) including to meet the mandatory reporting criteria set out at section 16 of the Modern Slavery Act. It outlines the steps taken to prevent modern slavery practices in its operations and supply chains by Land Services SA Holding Pty Ltd (ACN 618 228 096) as trustee for the Land Services SA Holding Trust (ABN 14 477 089 305) (**Land Services SA** or **LSSA**), a private Australian-domiciled trust, in its own right and on behalf of its controlled entities comprising:

- Land Services SA Operating Pty Ltd (ACN 618 229 815) as trustee for the Land Services SA Operating Trust (ABN 86 836 650 939);
- Land Services SA Employee Pty Ltd (ACN 618 252 538);
- Land Services SA Employee 2 Pty Ltd (ACN 618 252 592);
- Autumn Finance Company Pty Ltd (ACN 616 548 031); and
- Relational Data Systems Pty Ltd (ACN 114 514 037).

(collectively the **LSSA Group**).

This Statement has been prepared and endorsed by the LSSA Executive prior to submission to the Board of LSSA.

This Statement for the financial year ending 30 June 2022 was approved by the Board of Land Services SA Holding Pty Ltd (ACN 618 228 096) as trustee for the Land Services SA Holding Trust (ABN 14 477 089 305) on **17 October 2022**. The Board have delegated authority to the Chairperson and Chief Executive Officer to sign and submit this Statement for and on behalf of the LSSA Group.



Christopher Mark Butcher
Chairperson



Brenton Pike
Chief Executive Officer

Dated: 17 October 2022

2. INTRODUCTION

(a) Purpose

LSSA is committed to the prevention of all forms of modern slavery including servitude, forced and compulsory labour and human trafficking in our business and supply chains. LSSA supports the goals of the Modern Slavery Act and prides itself on acting ethically and responsibly, and we expect our people and suppliers to share our commitment to ensuring modern slavery practices do not exist in any area of our business and supply chain.

LSSA acknowledges that freedom from slavery is a fundamental human right. LSSA also recognises that slavery can take many forms. The Modern Slavery Act defines modern slavery as including eight types of serious exploitation:

- trafficking in persons;
- slavery;
- servitude;
- forced marriage;
- forced labour;
- debt bondage;
- deceptive recruiting for labour or services; and
- the worst forms of child labour (meaning situations where children are subjected to slavery or similar practices, or engaged in hazardous work),

(collectively **Modern Slavery**).

The purpose of this Statement is to outline the policies, standards, processes, and approach of the LSSA Group in minimising and protecting against the risk of Modern Slavery within its business operations and supply chains.

(b) Reporting Period

This Statement applies for the following Reporting Period: **1 July 2021 to 30 June 2022** (the **Reporting Period**).

(c) Mandatory Criteria

Attachment 1 to this Statement sets out the location in this Statement of the mandatory disclosure topics required by section 16 of the Modern Slavery Act.

(d) Review

This Statement will be reviewed annually or more frequently as required to address any risks of Modern Slavery practices that arise in LSSA Group's business and supply chains.



3. ABOUT US

(a) Our Operations

In October 2017, the LSSA Group was appointed as the exclusive service provider to the State of South Australia (the **State**) in respect of certain land transaction processing, registry and customer services and State valuation services previously administered through the Offices of the Registrar-General and Valuer-General respectively. Our exclusive concession operates for 47 years. LSSA provides a range of property transaction and valuation services, property information products, custom data sets and reliable market insights. Our services include:

- provision of property information including: sales information, ownership information, property valuation details, building information and full disclosure on any easements or encumbrance;
- provision of custom data solutions;
- registration of property transactions;
- processing of land divisions; and
- property valuations in support of the Officer of the Valuer-General.

In addition, as part of the appointment by the State, LSSA was granted certain exclusive rights to commercialise land information collected as part of performing those services.

In January 2020, Land Services SA Operating Pty Ltd (a member of the LSSA Group) also acquired Relational Data Systems Pty Ltd (**RDS**) a software development company that builds and manages information systems and online portals, specialising in land and spatial information management providing key software development and support services to land registries throughout Australia. RDS is a controlled entity of, and forms part of, the LSSA Group.

The LSSA Group trades under the business names of “*Land Services SA*” and “*Relational Data Systems*”.

The LSSA Group has a registered office at, and operates from, Level 9, 101 Grenfell Street, Adelaide.

Since its inception in October 2017, as a trusted partner of the State, the LSSA Group has delivered high valued, reliable services to the community, been recognised for creating innovative solutions and ranked as one of South Australia’s top-15 companies. The LSSA Group has an annual turnover of more than \$100 million and, as of 30 June 2022, employed 160 people.

As leading property experts in South Australia LSSA annually:

Examining over 4,300 land division plans each year	Examining over 200k property transaction dealings each year	Valuing over 910k properties each year
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For more information on LSSA’s business, please refer to our website at: www.landservices.com.au.

(b) Our Structure

Each of the entities that we own or control, were engaged in the development of this Statement through the following:

- The LSSA Group is a closely held group with a common Board of Directors and officers appointed to Land Services SA. Each controlled entity within the LSSA Group operates under the direction and governance of LSSA and all share the same executive management.

- LSSA has embedded an extensive compliance and risk framework across its entire operations and operates as a single business unit. Modern Slavery risks, as with all enterprise risks, were discussed as part of our regular monthly LSSA Executive Risk Working Group.
- Each entity within the LSSA Group is covered by LSSA’s policies, procedures, and systems, including those relating to contracting, purchasing and human resources.
- Our Board, Executive and senior leadership team are aware of, and have directly participated in, those activities relevant to our Modern Slavery risk management efforts including our reporting obligations under the Modern Slavery Act.

Accordingly, all entities within the LSSA Group were engaged in the development of this statement, are aware of their obligations under the Act and have been consulted as part of the preparation and submission of this Statement.

(c) Our Supply chains

As LSSA’s primary operations relate to the operation of a land registry system, supporting the Office of the Valuer-General in the valuation of properties within South Australia and ICT consultancy work, our cost base is primarily comprised of **people related costs** and **information and communication technology (ICT) expenses**. LSSA is a moderate purchaser of goods and services required for our business ranging from single occasion purchases to longstanding contractual relationships. In the Reporting Period, the LSSA Group had a total annual spend of approximately \$14,000,000 on goods and services procured from approximately 518 suppliers.

Our major suppliers are generally engaged on a fixed term basis typically ranging from project specific timeframes (e.g., 3-12 months) to longer master agreements for 3 years or on an ongoing basis and provide us with goods and services in the following areas:

Categories	Percentage of total supplier spend
ICT (including ICT consultancy works, data procurement and infrastructure hosting)	37.68%
Utilities	16.86%
Consultancy	21.88%
Facilities	15.19%
Finance and insurance	3.69%
Employee services (including labour hire)	4.20%
Catering	0.47%

While we predominantly use Australian suppliers, we also use global suppliers in 6 other countries. Regardless of location, the LSSA Group partners closely with our direct suppliers to understand and evaluate their supply chain practices and we actively seek to engage with suppliers and other third parties who share similar values, ethics, and sustainable business practices. During the Reporting Period those vendors and suppliers located overseas comprised less than 1% of all third-party vendor spend and were based in the following locations:

Country	Percentage of total supplier spend	Country Rating (Ranking out of 167 / estimated prevalence per 1,000 population) ¹	Risk Rating ²
Australia	99.03%	163 / 0.6	Low
USA	0.55%	158 / 1.3	Low
Norway	0.02%	140 / 1.8	Low
India	0.07%	53 / 6.1	Medium
Canada	0.13%	166 / 0.5	Low
New Zealand	0.2%	164 / 0.6	Low
High Risk Countries ³	0.00%	-	N/A

4. RISKS OF MODERN SLAVERY PRACTICES

LSSA understands that the nature and extent of Modern Slavery globally means that Australia is not immune from Modern Slavery and that there is a risk that it may be present in its operations and supply chains.⁴ The United Nations (UN) and Walk Free Foundation have estimated that there are approximately 40 million victims of Modern Slavery around the world.⁵ Preventing our own involvement in Modern Slavery forms part of our own commitment to operate a responsible and safe business understanding the critical South Australian economic infrastructure of which we are custodians.

While the professional services sector is not typically associated with Modern Slavery practices, we are conscious that risks can also arise in certain industries connected to the professional services sector – in particular in the supply of goods and services in relation to:

- IT and electronic equipment where such goods may have been manufactured by another entity using minerals sourced or mined using forced labour;
- labour hire; and
- catering services.

As our operations are based and occur solely in South Australia, Western Australia, and the Northern Territory, and considering the relevant sector and products and services risks to LSSA, we are at comparatively lower risk than other reporting entities within our industry. Accordingly, assessed through the LSSA Group’s risk management framework, Modern Slavery risk has been assessed as a **low** risk. However, and while we predominantly use Australian suppliers,⁶ we recognise that several of our suppliers have global operations and therefore we must remain vigilant of the potential risk for the LSSA Group to be directly or indirectly linked to Modern Slavery practices.

We acknowledge, and are working to understand, the vulnerabilities and potential risks with those suppliers whose global operations pose as an increased susceptibility to modern slavery supply chain issues. See further discussion

¹ Walk Free Foundation, The Global Slavery Index 2018, Appendix 2, Table 4. The lower the ranking the lower the estimated prevalence (per 1,000 population) of all forms of modern slavery except state-imposed forced labour.

² Based on the estimate prevalence of modern slavery (per 1,000 population) assessed as Low (less than 3 victims per 1,000 people); Medium (less than 7 but more than 3 victims per 1,000 people); and, High (greater than 7 victims per 1,000 people).

³ The 10 countries with highest prevalence of modern slavery globally, along with North Korea and Eritrea, are Burundi, the Central African Republic, Afghanistan, Mauritania, South Sudan, Pakistan, Cambodia, and Iran. Source: Global Slavery Index – 2018.

⁴ Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities - (8-12), available at URL: <https://www.homeaffairs.gov.au/criminaljustice/files/modern-slavery-reporting-entities.pdf>.

⁵ Ibid.

⁶ See Discussion at “About Us – Our supply chain”.



below at “Our approach to tackling Modern Slavery practices” and “Moving forward”.

5. OUR APPROACH TO TACKLING MODERN SLAVERY PRACTICES

We adopt a multi-layered approach to managing Modern Slavery risks within our business focussing on our **corporate governance framework** and our **systems, processes, policies, and procedures** (including group-wide policies, management/operating procedures, our enterprise risk appetite, and Risk Management Framework).

(a) Corporate Governance Framework

Ultimate oversight and responsibility for the steps we take to ensure that we eradicate Modern Slavery practices in our business and supply chains rests with our Board. Our Risk Committee monitors and reports on the progress we make. Our Legal, Finance, ICT Security and Human Resources teams assist in the day-to-day actions taken to tackle Modern Slavery (including through each business unit undertaking procurement for their function).

Responsible Party	Responsibilities
Board	The Board is responsible for setting the strategic direction and risk appetite for the LSSA Group through the Risk Committee and ensuring general oversight and monitoring of the risk culture through Reports provided to the Board and Risk Committee by the Executive. In respect to Modern Slavery risks this includes the ongoing assessment of Modern Slavery risks as raised by the Executive and approving this Statement annually.
Executive	LSSA has an enterprise risk management framework which provides a consistent approach for identifying, analysing, evaluating, treating, monitoring, and reporting risks at all levels of the organisation. The Executive , under the leadership of the Chief Executive Officer, is accountable for: <ul style="list-style-type: none"> • monitoring, reviewing, and improving the effectiveness of our approach to risks of Modern Slavery practices within our business; and • ensuring that there are systems in place so that such risks are appropriately controlled. The operationalised systems, processes, policies, and procedures adopted by us are discussed further below.
Employees	Our Code of Conduct applies to all our Employees and requires each person to be treated with respect and dignity. It makes clear our commitment to complying with all laws and acting ethically and with integrity in our relationships in rejecting any form of Modern Slavery practices. As part of their onboarding and their ongoing employment, all Employees are required to familiarise themselves with our Code of Conduct and Whistleblower Protection Policy. All Employees must confirm their commitment to our Code of Conduct annually. Our Whistleblower Policy sets out our commitment to ensuring people are free to question things and raise anything they are concerned about, including practices of our suppliers, service providers or contractors.

(b) Our systems, processes, policies, and procedures

We have established policies relevant to identifying, assessing, and mitigating the risks of Modern Slavery practices in our business as listed below. Our policies ensures that we meet our ethical business objectives and comply with our legal obligations. These policies are approved in accordance with our internal Delegations of Authority Policy and apply to all the entities we own and control.

Our key systems, processes, policies, and procedures which currently relate to the control of Modern Slavery risks are:

- **Code of Conduct:** LSSA’s Code of Conduct reinforces LSSA’s position on human rights and Modern Slavery. All employees are expected to abide by the spirit, as well as the strict requirements, of the Code of Conduct and applicable policies and procedures – employees are expected to ask not just “can we” but “should we”. Each year employees are required to confirm they have read and understood and confirm their commitment to the Code of Conduct (including, where appropriate, reporting non-compliances). This is also a compulsory component of new employee inductions. The Code of Conduct is reviewed at least annually and updated if needed.
- **General Policies:** We have implemented several policies to ensure we act ethically and with integrity and observe fundamental aspects of human rights in all our business and employee relationships. These include our Code of Conduct (discussed above) and our work health safety policies (including our Diversity and Inclusion Policy).
- **Pre-employment screening and employment terms:** LSSA operates in a highly regulated environment and has robust policies and procedures concerning employment screening (including work eligibility checks), employment conditions (including fair pay and hours) and appropriate workplace behaviour. For example, all employees undertake extensive pre-employment background checks as part of our recruitment process and work terms and conditions are clearly outlined in an employee’s contract.
- **Safe workplace:** LSSA is committed to maintaining a safe workplace that values equal opportunity and is free from discrimination, harassment, and victimisation. LSSA is also committed to maintaining an environment where staff feel comfortable raising issues or concerns and do not experience detriment because of speaking up. This is reinforced through various avenues for raising concerns including those embedded in our Code of Conduct and Whistleblower Protection Policy.
- **ESG Reporting:** LSSA participates in annual global ESG benchmarking to measure LSSA’s performance across all material social, governance and environmental issues including aspects of Modern Slavery.

LSSA recognises that continuous improvement is a key element of creating an effective compliance and risk management system. Accordingly, the above systems, processes, policies, and procedures will be continually reviewed to ensure they remain effective and appropriate to control Modern Slavery risks within LSSA’s operations and supply chains. In this regard, see further at “*Modern Slavery risk management tasks undertaken in the Reporting Period*” and “*Moving Forward*” for future activities planned for the next Reporting Period.

(c) Modern Slavery risk management tasks undertaken in the Reporting Period

During the Reporting Period, LSSA had expected to become a “reporting entity” under the Modern Slavery Act. Accordingly, our key focus was primarily on:

- ensuring that Modern Slavery risks were considered as part of our enterprise risk management framework;
- consolidating and understanding information on the location and industries of our highest suppliers (including a high-level assessment of the current risk of Modern Slavery in our business);
- commence integrating controls in our existing policies, procedures, and operations for Modern Slavery risks. In this respect, during the Reporting Period, LSSA undertook the following tasks directly relating to Modern Slavery risk management:
 - **Code of Conduct (review):** Refreshed our Code of Conduct to confirm in writing LSSA’s position on human rights and Modern Slavery.
 - **Code of Conduct sign-off:** Prior to 30 June 2022, all employees completed the annual Code of Conduct sign-off (which included revisions addressing Modern Slavery).
 - **Supplier contract terms:** Developed specific Modern Slavery contractual clauses for inclusion in our suite of template supplier agreements. These terms were implemented and utilised in the Reporting Period.

- **ESG Benchmarking:** Participated in global ESG benchmarking to measure LSSA's performance across all material social, governance and environmental issues including aspects of Modern Slavery.

(d) Assessing and reporting on effectiveness

From its initial analysis, LSSA has not identified any actual or potential cases of Modern Slavery practices within its operations and supply chains.

We have established a process to periodically review the effectiveness of the measures we have put in place against the following key metrics:

- Modern Slavery training programs delivered to our people (as a % of total staff).
- The number of low, medium and high risk category suppliers identified through our risk assessment process (having regard to value of spend, geographic location and applicable industry) and the percentage of suppliers (in high-risk categories) who have engaged with us in a constructive manner to address the risks of Modern Slavery in their business and supply chains (including, for example, through publication of supplier Modern Slavery policies or by reference to the percentage of Supplier contracts with Modern Slavery contract terms and/or responses to any annual questionnaires).
- The number of reports of Modern Slavery through LSSA's whistleblower or other reporting channels.

The measures that LSSA has put in place to mitigate Modern Slavery practices in our business and supply chains will be assessed for the first time during the Reporting Period ending 30 June 2023. They will also continue to evolve over time. We will report on the progress we have made and review the effectiveness of the measures we have put in place during the next (and subsequent) Reporting Periods. Ongoing reporting will form part of LSSA's standard reporting of enterprise risks to the LSSA Board and Risk Committee.

(e) Modern Slavery risk and the impact of COVID-19 and the Ukraine conflict

Modern Slavery risks are constantly evolving. FY2022 continues to see the unprecedented impact on people and business globally as the COVID-19 pandemic, and rapidly changing variants, impacted everyone from a health, social and economic perspective. There has been further disruption because of the conflict in the Ukraine which highlights how war and conflict intersect with Modern Slavery.

The health and safety of our employees and customers remains our key focus. LSSA is extremely proud of how it and its people have responded to the pandemic in introducing new ways of working while maintaining high quality, continuing and efficient services for industry. While COVID-19 remains an ongoing risk, and with the conflict in Ukraine there remains pressure on global supply chains in the form of factory shutdowns, order cancellations, workforce reductions and sudden changes to supply, LSSA has not been subject to any material impact on its supply chain.

6. MOVING FORWARD

LSSA is committed to taking steps to ensure that Modern Slavery practices do not exist within in our business and supply chains. Accordingly, we intend to continue to review and enhance our approach to addressing Modern Slavery risks including through the following activities:

Goal	Description	Status	Future Goal
Template Supplier Agreements	Undertake annual review of our template procurement and supplier agreements and where necessary enhance terms (including, where relevant from a risk perspective, require suppliers to maintain records in relation to their supply chains, provide any information relating to any developed supplier questionnaires so that we are comforted that there are no Modern Slavery practices are present in their business or supply chain).	Ongoing.	For reporting in FY24 Reporting Period.

Modern Slavery training	Conduct training with our key people to raise awareness of Modern Slavery practices across our business and supply chains. Training will address general Code of Conduct requirements and more specific training relating to Modern Slavery including: what Modern Slavery practices are, the cost and impact on individuals, business and the wider global community, our obligations under the Modern Slavery Act, the actions we are taking to eradicate Modern Slavery practices in our business and supply chains and how to report suspected abuses.	Proposed.	For reporting in FY24 Reporting Period.
Policies and Procedures	Enhancing policies and procedures that enable our key people to identify, assess and mitigate the risks of Modern Slavery practices in our enterprise and supply chains such as reviewing and amending our Whistleblower Protection Policy to expressly address risks of Modern Slavery practices.	Ongoing.	For reporting in FY24 Reporting Period.
Supplier Management	As part of supplier selection and onboarding process we will develop Modern Slavery considerations to better understand our suppliers and the risks of Modern Slavery within our supply chains prior to engagement. This may include the development of a Supplier Code of Conduct. We will undertake desktop reviews of our Suppliers (in high-risk categories).	Proposed.	For reporting in FY24 Reporting Period.
ESG Benchmarking	Continuing to participate in global ESG benchmarking, and work to increase our overall score, to measure performance across all material social issues including aspects of Modern Slavery.	Ongoing.	For reporting in FY24 Reporting Period.
Modern Slavery Complaints	Monitor and respond to any complaints received by employees, customers, suppliers, contractors or third parties, including through the Whistleblower Protection Policy.	Proposed.	For reporting in FY24 Reporting Period.

ATTACHMENT 1: MANDATORY REPORTING CRITERIA

This Statement was prepared to meet the mandatory reporting criteria set out at section 16 of the Modern Slavery Act. The below table identifies where each criterion is addressed within the Statement.

	Modern Slavery Act Criteria	LSSA Modern Slavery Statement	Page Reference
1.	Identify reporting entity	Modern Slavery Statement	1
2.	Describe the reporting entity's structure, operations, and supply chains.	About Us	3
3.	Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Risks of Modern Slavery Practices	5
4.	Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes.	Our approach to tackling Modern Slavery Practices	6
5.	Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks.	Our approach to tackling Modern Slavery Practices – Assessing and reporting on effectiveness	8
6.	Describe the process of consultation with any entities the reporting entity owns or controls.	Modern Slavery Statement; About Us – Our Structure	1, 3

