



Lewis Land Group Modern Slavery Statement FY21

Introduction

This is the second Modern Slavery Statement (the 'Statement') made by Lewis Land Holdings Pty Limited (the 'Company'), being the parent company of the Lewis Land Group (the 'Group'), which covers the financial year from 1 July 2020 to 30 June 2021 ('FY21'), published in accordance with the *Modern Slavery Act 2018 (Cth)* (the 'Act').

The Company is a reporting entity pursuant to section 5 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 next section.

This Statement outlines the Group's approach in ensuring that our business and supply chains are managed within a framework that mitigates modern slavery risk, the actions taken during the reporting period and how the Group intends to continually improve its processes in future years.

The Group is committed to reducing the risk of modern slavery practices in our business operations and supply chains and responding to incidents if they occur.

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.

The Statement has been approved by the Board of Directors of the Company on 17 December 2021.

Matthew McCarron
Chief Executive Officer

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 co-ordinated 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 in the diagram below. For more information about our business, refer to www.lewisland.com.

In FY21, the Group directly engaged over 750 suppliers to provide goods and services for our businesses, with an annual spend of \$100 million.

Our operations are solely Australian based (New South Wales, Queensland, and South Australia) and our Tier One relationships are with domestic and local suppliers of goods and services. We recognise that within our Tier Two supply chain and beyond, goods and services will be sourced from international suppliers, which operate under different governance and legislative systems to protect labour and human rights.

We operate under a robust corporate governance framework as we recognise that effective corporate governance is critical to the broader success of the Group. The Group's assessment of modern slavery risk is managed via the same governance structure used for managing all other risks of the Group. The Group's Board oversees our corporate governance framework and has delegated authority to our Chief Executive Officer to assist in the oversight of compliance and risk, including our non-financial risk including modern slavery issues.

The Group's divisions are actively involved in driving our overall modern slavery response. This includes developing and implementing our modern slavery policies and practices across our direct workforce and supply chain. During FY21, the Group established and convened our first Modern Slavery Working Group. The Modern Slavery Working Group is responsible for overseeing the implementation of the Group's strategy and compliance with the Act. The Working Group comprises representatives from all of our four divisions.

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 cleaning and security services for all centres. Other businesses are engaged for utilities, 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)
 Lewis Developments Trust (ABN 46 308 542 030)

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

Our most recent project is Sovereign Hills, located in Port Macquarie NSW.

We have a small team of 7 members 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, building contractor 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
- The Komo Hotel, Redcliffe, QLD

We employ over 500 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 procure ongoing cleaning and security services for all venues as well as laundry, linen and uniform suppliers. A Sydney firm 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 18 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 unit, Corporate tends to engage financial, professional, property, technology (hardware and software), travel and insurance service providers.

Modern slavery risks in our operations and supply chain

RISKS IN OUR WORKFORCE

During the reporting period, we once again considered the risks of modern slavery practices within the direct workforce of our Capital division, Development division and our Corporate support function as low. Our employees are primarily working in professional services exclusively within Australia where employee-employer relations are strictly regulated by legislation and modern awards. These are smaller teams, conducting predominately office based activities, which combined with a robust reporting framework, can reduce the likelihood of exploitation.

We recognise that hospitality is identified as a higher-risk industry where labour exploitation can occur. Accordingly, 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 are committed to an employment framework that protects our workforce. All venues are subject to the Group's corporate compliance framework as it relates to labour.

The Group implements a range of measures to ensure compliance with relevant employment instruments and obligations, including use of first-class time and attendance systems (with award interpretations and an employee self-service portal enabling staff to view rosters, payslips including rates and hours worked, and updating personal details), central issuance of employment contracts, maintenance of a detailed suite of employment policies, periodic engagement with consultants to verify compliance and reporting, whistleblower and grievance policies and procedures, and central oversight of venue management.

RISKS IN OUR SUPPLY CHAIN

We continue to consider the risks of modern slavery practices to be higher in our supply chain than our direct workforce. We also understand that identifying modern slavery risks in a supply chain is complex and needs to extend beyond Tier One suppliers.

In FY21, we reconfirmed areas of modern slavery risks identified during the first reporting period (FY20).

The following areas in our operations and supply chains remain particularly at risk of modern slavery practices:

- Cleaning, housekeeping and security services
- Laundry, linen providers and uniform suppliers
- Distribution of food and other consumable goods
- Utilities, including electricity, water supply, waste and sanitary disposal
- Building contractors and materials suppliers
- IT hardware and software

Potential risks associated with the above industry categories include the types of workers (low skilled, temporary, casual, part-time and overseas student workers), child labour or forced labour at the originating location, compliance with local labour laws, non-ethical sourcing of materials and products and overseas manufacturing in low-cost countries.

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

Since our first Statement, the Group has continued to establish strong foundations to embed the consideration of modern slavery risks into our procurement processes.

A number of actions were taken during FY21 to support our modern slavery approach, which included:

- Established a Modern Slavery Working Group to develop and implement our modern slavery strategy, manage our various initiatives and ongoing priorities
- Engaged an independent expert consultant to assist us develop a modern slavery strategy, design risk assessment tools, prioritise a program of works and deliver our first Statement
- Commenced consultations with internal stakeholders in all divisions which has built up the Group's understanding and accountabilities for modern slavery risk and guided people on how to respond to actual or suspected incidents of modern slavery
- Evolving supplier agreements in the Capital and Leisure divisions to include modern slavery related clauses regarding compliance with the Act and taking reasonable steps to ensure there is no modern slavery in their supply chain
- Incorporated modern slavery awareness into the on-boarding process and delivered initial training to provide employees with tools on how to recognise and report modern slavery concerns
- Collaborated with our peers in order to strengthen our modern slavery response

Further, the Group continues to assess the efficacy of its policies and frameworks, including those related to code of conduct; whistleblowing; procurement; contractors and sub-contractors; work, health and safety; recruitment and selection; and discrimination, harassment and bullying.

In FY22, we will continue to mature processes across our suppliers and contractors to integrate modern slavery risk mitigation into our operations.

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

- Complete comprehensive risk assessment of our supply chain, including suppliers to all divisions, to identify any potential human rights and modern slavery risks
- Continue to engage with suppliers and contractors of all divisions on raising awareness around modern slavery risks, including continuing to update supplier agreements
- Seek out and utilise new technology tools to improve our supplier monitoring and reporting mechanisms
- Make enhancements to our risk governance framework and reporting procedure to ensure it can respond to any modern slavery concerns
- Expand employee training across all divisions to raise awareness, accountability and compliance within our workforce to ensure information is shared and responsibility taken

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 co-ordinates between divisions and provides advice and guidance when managing emerging risks.

In assessing the effectiveness of our actions to reduce exposure to modern slavery, our focus has been on building and enhancing our existing risk frameworks to address modern slavery risks and strengthening our understanding and capabilities to identify potential modern slavery risks.

To monitor the effectiveness of the actions taken to mitigate modern slavery risks in our operations and supply chains, the following measures were taken during FY21:

- Ongoing assessment and management as part of our risk management framework, including quarterly reporting to the Board
- Regular consultation between all divisions
- Ongoing engagement with our key suppliers of the issues of modern slavery

The Group's practices, policies and procedures appear to have been effective in addressing and potential modern slavery within our supply chains. During FY21, no instances of modern slavery were identified in the Group operations or supply chains.

Consultation

Our Corporate support function facilitates co-ordination across the Group and ensures that key communication channels incorporate modern slavery risk management within reporting.

We co-ordinate our modern slavery strategy through tasking actions to divisional leaders to identify, assess and mitigate modern slavery risk in their operations and supplier relationships.