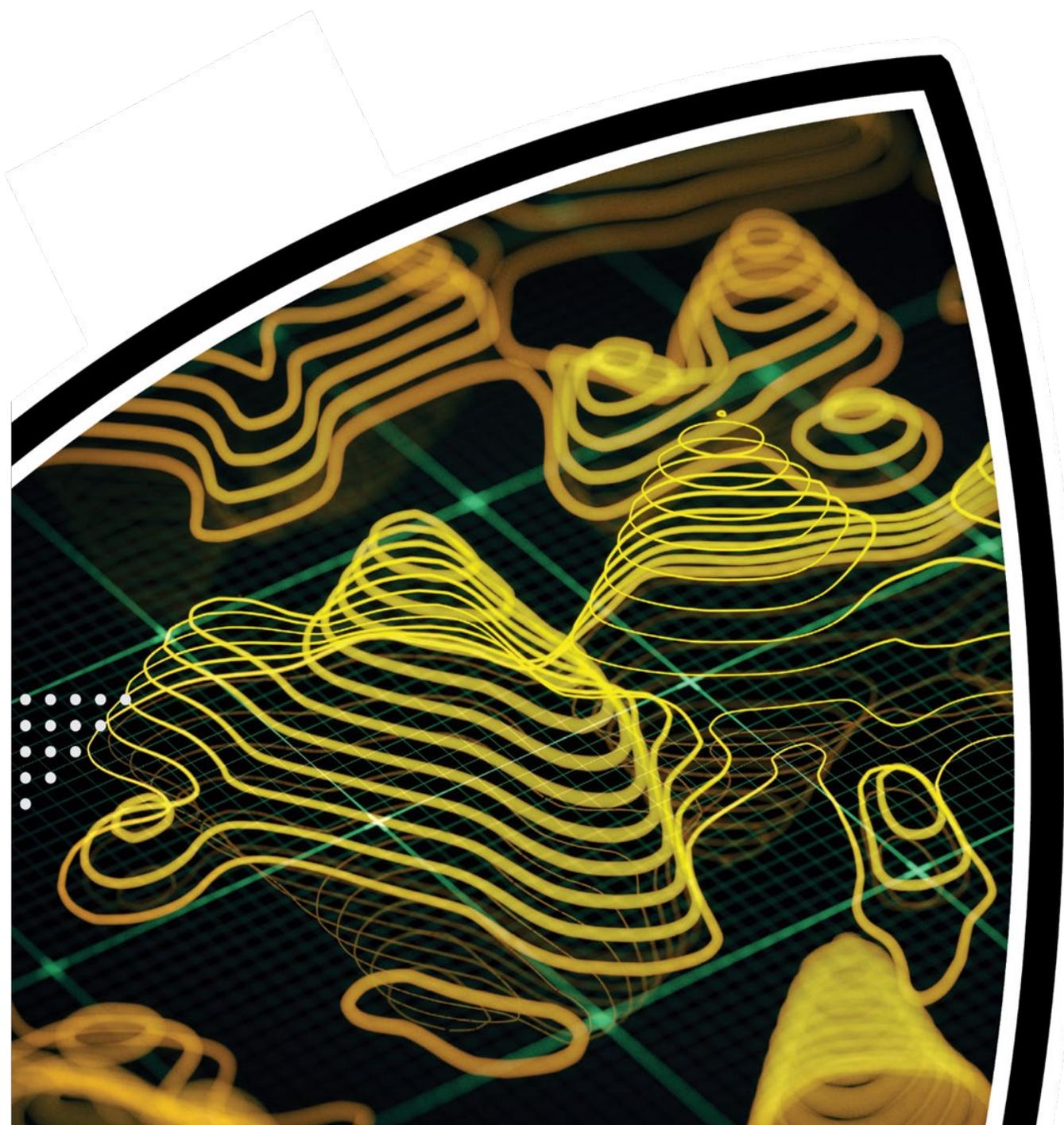




Modern Slavery Statement

Land Services WA Holdings Pty Ltd as trustee for the Land Services
WA Holdings Trust (Land Services WA)

1 July 2021 to 30 June 2022



1. Consultation and Endorsement

This is the first Modern Slavery Statement (**Statement**) being made in accordance with the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**).

It outlines the ethical governance, approach, and framework adopted to prevent modern slavery practices in the business operations and supply chain of Land Services WA Holdings Pty Ltd (ACN: 635 079 873) as trustee for the Land Services Holdings Trust (**Land Services WA**). This is in its own right and on behalf of all its controlled entities comprising:

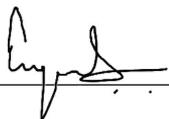
- Land Services WA Operating Pty Ltd (ACN 635 080 232) as trustee for the Land Services WA Operating Trust;
- Land Services WA Employee Pty Ltd (ACN 635 080 581); and
- Summer Finance Company Pty Ltd (ACN 634 670 296), collectively the **Land Services WA Group**.

Land Services WA recognises the importance of safeguarding human rights and adhering to the highest ethical standards across our operations and indirectly through our greater supply chain and network.

Land Services WA is committed to no harm to personnel and explicitly no modern slavery risks in our business. This is specified in our Board endorsed Risk Appetite Statement and in our Code of Conduct that applies to our officers, personnel and network of contractor and subcontractors who help us meet our business objectives.

This Statement was prepared as part of a review of our risk and compliance environment by the team at Land Services WA and the General Counsel, who is responsible for compliance and risk management within the business. It was reviewed and endorsed by the Land Services WA Executive prior to submission to the Board of LSWA.

This Statement, for the fiscal year ending 30 June 2022 was approved by the Board of Land Services WA, for and on behalf of each entity in the Land Services WA Group and will be updated annually. The Board have delegated authority to the Chairperson and Chief Executive Officer to sign and submit this Statement for and on behalf of the Land Services WA Group.



Eugene Soares

Chief Executive Officer

Dated: 20 December 2022



Mark Butcher

Chairman of the Board of Directors

Dated: 20 December 2022

2. Introduction

Land Services WA remains committed to adhering to the highest ethical standards and ensuring its governance practices deliver lasting value for its people, the community and the supplier network it utilises. We recognise that human trafficking and slavery can occur in many forms including traditional slavery, servitude, human trafficking, forced marriage, debt bondage, forced labour, deceptive recruitment practices and child labour.

As part of our work to make this Statement, we have aligned our operations with the United Nations Guiding Principles on Business and Human Rights as we work to ensure our policies, governance and due diligence processes take account of human rights. This includes our championship of the United Nations Sustainable Development Goals (UNSDG), specifically Goal 16 of Peace, Justice and Strong Institutions.¹

Land Services WA is committed to ethical, responsible, and sustainable operations and the continual growth and development of objectives to support integrity and transparency. Land Services WA expect our people and suppliers to share our commitment that modern slavery practices must not exist in any area of our business or supply chain.

3. Our Business

Land Services WA was appointed in October 2019 as the Service Provider to Landgate, the Western Australian Land Information Authority. Our appointment was the result of the Landgate Partial Commercialisation Program and we were entrusted with the provision, improvement, and maintenance of Landgate's automated Titling, Plan, Search and various Commercial Services. Our exclusive concession operates for a 40-year term with Landgate and the State of Western Australia.

At our core, Land Services WA is a technology solution provider, working collaboratively with the State of Western Australia as well as clients and partners. We are committed to delivering products and services that support growth, efficiency and risk management imperatives. In conjunction with Landgate and the State of Western Australia, Land Services WA can leverage access to land and property data to develop product or service solutions for the community. This has culminated in several approved products.

Since inception we have grown into a trusted partner for Landgate and the State of Western Australia, delivering high value, reliable services, while transforming and moving our services into the digital environment. We have also invested for improved customer outcomes and enhanced security of the register. This has culminated with the Land Services WA Group having an annual turnover over \$100 Million in the fiscal year ending 30 June 2020.

For more information on our business, please refer to our website: www.landservices-wa.com.au

4. Our Structure

We operate under the business name, Land Services WA and we have our registered offices at Level 1, 3 Craig Street, Burswood WA 6100.

¹ United Nations 2030 Agenda, Goal 16

This Statement is being made by Land Services WA Holdings Pty Ltd as trustee for the Land Services WA Holdings Trust and on behalf of all its controlled entities.

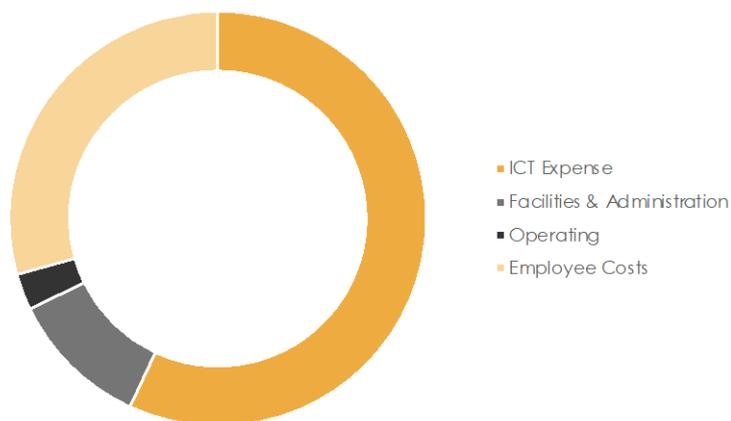
All entities within the Land Services WA Group are engaged, consulted as part of preparing this Statement, and are aware of their obligations under the Modern Slavery Act, noting that:

- The Land Services WA Group is a closely held group with a common Board of Directors appointed to each entity.
- Each entity operates and is governed under the direction of the common Board of Directors and share the same Executive management.
- The compliance and risk framework is embedded and applicable across the entire operations of the Land Services WA Group.
- All policies, procedures and systems, including those relating to the prevention of modern slavery, including as applicable to our supply chain operates and is applicable across all entities.
- Our Board, Executive, senior leaders and personnel for all entities are aware of and have directly participated in understanding our position on modern slavery and our ongoing management and obligations in relation to modern slavery.

5. Our Operations and Supply Chain

Land Services WA is headquartered in Western Australia, with resources supporting our primary operations spread across Australian Capital Cities. Land Services WA, has a personnel complement approximately 50 strong, comprised of both direct employees and subcontractors that support our services to the State and commercially. Our operations primarily relate to the provision of services to operate a land registry system and our cost base is primarily comprised of information and communication technology (ICT) and employee related expenses as outlined below:

FY2022 Expenditure Breakdown



Our operations are exclusively within Australia and we are afforded the protections and obligations under domestic legislation such as the *Work Health and Safety Act 2020* (WA) and *Fair Work Act 2009* (Cth) that protect a number of workplace rights surrounding safety, remuneration, discrimination and exploitation.

In relation to our broader supply chain, Land Services WA is a moderate purchaser of goods and services. The majority of our contracted services are sourced locally and within Australia, with a policy of sourcing from Indigenous businesses where possible. Our supplier base is concentrated in information technology services and various software as a solution services, as outlined below:

Country and Service	Total Contract Spend
Australia	97.52%
Advisory Services	5.80%
Financial Services	0.53%
IT Service Provider	84.29%
Office Services	4.03%
SaaS	2.87%
Estonia	0.01%
SaaS	0.01%
Israel	0.001%
SaaS	0.001%
United States of America	1.95%
SaaS	1.95%
Czech Republic	0.52%
SaaS	0.52%

We note that approx. 97% of our supplier base is within Australia, with most classified as 'Reporting Entities' under the Modern Slavery Act. This means the majority of our key supplier base have adopted their own Modern Slavery compliance actions and ethical procurement practices upon which they report annually to either their shareholders or within their own Modern Slavery Statements.

6. Our Review

Overall Land Services WA has a comprehensive risk and compliance framework as part of our standard corporate governance. Given our primary operations relate to the support of Landgate, an instrumentality of the State of Western Australia, our governance regime is rigorous and mitigates most of our Modern Slavery risk profile.

As this was Land Services WA first reporting period, we have undertaken a comprehensive review and analysis of the broader scope of our operations, and the risk or exposure we have to Modern Slavery. This included the following:

- **Review of our Enterprise Risk Management Framework**, inclusive of our Risk Policy, Risk Appetite Statement and our Board Specialist Function Risk that reports our overall risk management for the oversight of our Board.
- **Review of our Corporate Policies**, inclusive of our Code of Conduct, Employee Handbook and relevant policies such as the Procurement and Contracting Policy that impacts and governs our corporate response to Modern Slavery Risk.
- **Review of our Contract and Procurement practices** that is directly responsible for how our procuring manager, contract and financial team engage and report on services we receive.
- **Review of our existing Industry and Supplier Network** to determine the level of current exposure and any additional steps or activities required to avoid or minimise Modern Slavery Risk.

7. Our Risk Assessment

From our analysis, Land Services WA has not identified any actual or potential cases of Modern Slavery practices within its operations or supply chains. We recognise that while our professional services sector is not typically associated with modern slavery risk, we are conscious of ensuring our broader supply network meets our obligations and standards.

Land Services WA also undertook a deeper review of our supplier headquarters, operations, and respective commitment to Modern Slavery activities. In considering our supplier headquarters and their operations we noted the following risks:

Country	Spend %	Global Slavery Index ²	Risk Rating and Comments
China	<1%	111/167	LOW – the majority of our office electronic infrastructure is sourced from a company that is head quartered in China and that has significant Chinese operations. However, the company has a Modern Slavery Statement, is used extensively by the Australian Government and a number of large global organisations. The company also publicly report on their human rights practices and protections, fair salaries and working conditions.
Israel	<1%	90/167	LOW – the two companies we source from that are located in Israel are both Software companies. Israel is a mini tech-hub with a number of software corporations present. The two companies we use both independently report on human rights concerns, wages and labour practices.
United States of America	<2%	158/167	LOW – the risk rating of the United States of America is quite low comparatively to other nations. Again, the goods procured from US based companies are software as a service, which does in itself have a relatively low risk rating as an industry for Modern Slavery Practices. All entities we contract with that are US based have their own ESG (Environmental, Social & Governance) policies and reporting that is publicly available.
Estonia	<1%	94/167	LOW – a small software as a service has been procured from an Estonian based organisation. Little information is publicly available on their supply chain processes and or ESG commitments generally. While low value, it is a service used by thousands of organisations. Land Services WA will conduct further inquiries into this organisation prior to renewing our current agreement.
Czech Republic	<1%	108/167	LOW – the Czech Republic has a very low vulnerability score according to the Global Slavery Index. Further, the goods we procure are software as a service, with low risk of exposure evident.

² Global Slavery Index, Walk Free Foundation, 2017

Philippines	<1%	30/167	LOW – the Philippines has a high vulnerability score according to the Global Slavery Index. However, our exposure is fractional from a Microsoft software reseller, with some development services provided by officers from the Philippines. Further, the entity has a strong and robust Modern Slavery Statement and commitment, With low risk of exposure evident.
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All the above risks are classified as LOW risks, and largely in the nature of indirect risk.³ However, the deeper analysis highlighted the need for greater due diligence and review across our supply base to ensure we utilise companies that align with our values and have a commitment to ESG initiatives, including the prevention of Modern Slavery risks and practices.

In addition to our supplier analysis, our governance regime highlighted the following key risk areas of Modern Slavery impact.



Operational Risks:

The key risk to our operations is in the acquisition of office electronic infrastructure. As a digitally enabled business all our staff have company issued laptops and other hardware that goes through a standard asset lifecycle, resulting in cyclical end of life replacements.

The production of technology infrastructure has been highlighted as one of the key industries of concern for Modern Slavery practices, and Land Services WA will remain vigilant in our office procurement practices to maintain our standard of providers.



Supplier Industry Risks:

The risk is in our procurement of goods and services from the following industries, that while low risk are worthy of our attention:

- Office Services
- Software Services
- Professional Consulting Services

The key focus area for Land Services WA is that while our suppliers are domestic with domestic staff providing our services, software as a service poses a higher risk exposure extra territorially and will face greater scrutiny as part of our procurement process.



Supplier Location Risks:

The risk of our suppliers having a registered Australian business, but a global corporate footprint creates greater risk of modern slavery exposure.

The key focus area for Land Services WA will be to undertake regular review of our new providers, and any global operations they may have to ensure any risk is known and reviewed to ensure our standards are met.

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.

8. Our Actions

The outcome of Land Services WA Modern Slavery review and risk assessment can be summarised in the following proactive actions we have taken, and will continue to take, to ensure continual awareness and consideration of the impacts our operations may have on the risk of modern slavery:



Review of Industry and Suppliers

A review of our supplier network has been undertaken to build the foundation for our assessment and analysis of our supply partners. Investigations have been made into the primary location of our supplier operations, the companies ESG commitments and policies, and whether or not the company also produces an annual Modern Slavery Statement or equivalent. Land Services WA has reviewed the Global Modern Slavery Index and assessed the risk of Modern Slavery Practices from each supplier. Land Services WA will maintain and continually update a register of contracted parties that highlights these key areas of concern. This will continue to be updated year on year.



Commenced Operational Controls

A review and update of Land Services WA's corporate risk and compliance framework and register has been undertaken to account for Modern Slavery risks and our obligations under the Modern Slavery Act. An uplift has been made in a number of our Corporate Policies that apply to both direct employees and subcontractors to ensure that all staff are aware of Modern Slavery risks and practices, and that Land Services WA has no appetite for engaging in or contributing to these practices or risks.



Uplift of Procurement and Contracting Standards

Increased pre-contractual checks and due diligence have been introduced as part of our broader procurement and contracting framework to ensure that all agreements, are assessed for their risk of Modern Slavery Practices. Further, Land Services WA have reviewed and updated all of our standard form contracts to include specific provisions relating to Modern Slavery to ensure that all of our future suppliers, consultants and advisors adhere to the Modern Slavery Act, and report any instances of Modern Slavery Practices or risk in the supply of goods or services to Land Services WA.



Staff Education

Following the update of several Land Services WA Corporate Policies, we have implemented an annual review cycle for staff to review all policies and give them the opportunity to raise any concerns or queries. This cycle of training will include specific Modern Slavery training and insight to ensure the key staff undertaking procurement activity are aware of our commitment and obligation in this field as articulated by this Statement.



Participation in ESG Benchmarking

Land Services WA completes the annual GRESB Benchmark Assessment in order to receive an in-depth analytical report of our ESG performance. The detailed report is used by Land Services WA to identify areas of risk and opportunity from which a number of annual ESG improvement initiatives are prioritised and implemented including those associated with Modern Slavery policy and risk management. Land Services WA will continue to report to and be benchmarked as part of this process.

9. Our Commitment to Continuous Improvement

Land Services WA understands that the nature and extent of Modern Slavery is a global phenomenon, and even Australian based operations may be impacted or exposed to Modern Slavery Risk. Land Services WA is committed to continuing to improve our internal policies, practices and controls and reviewing our external supplier network to ascertain the risk or contribution to Modern Slavery practices through our operations.

Through our review, Land Services WA has implemented several changes that we have committed to review annually to ensure continual growth and development in this space. Uplifts in key areas such as procurement and contracts, corporate policy and risk and governance coupled with staff education and thorough analysis of our existing networks and risks has ensured that Land Services WA will continue to operate with the utmost respect and care for human rights.

To assess the effectiveness of our actions to address our modern Slavery Risk, Land Services will undertake the following activities:

1. Annual review of our supplier network to ensure we maintain our current standards.
2. Year on Year, increased percentage of staff trained or aware of Modern Slavery Risks and our position (as a % of total staff).
3. Periodic review of the number of low, medium and high risk category suppliers (having regard to spend, geographic location and applicable industry factors).
4. Continued improvement year on year in our procurement process that records our modern slavery investigations and new review processes as contracts are entered.
5. Record or number of reports of modern slavery risk through our respective reporting channels, including whistle-blower.

Appendix: Mandatory 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 criteria is addressed within the Statement.

No	Mandatory Criteria	Modern Slavery Statement	Page
1.	Identify reporting entity	Consultation & Endorsement	2
2.	Describe the reporting entity's structure, operations and supply chains.	Our Structure	3-4
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.	Our Risk Assessment	6-7
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 Review and Our Actions	5, 7-8
5.	Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks.	Our Commitment to Continuous Improvement	9
6.	Describe the process of consultation with any entities the reporting entity owns or controls.	Consultation & Endorsement and Our Structure	2, 3-4