

Modern Slavery Statement

1 July 2024 to 30 June 2025



onezeroone



1. ABOUT OUR MODERN SLAVERY STATEMENT

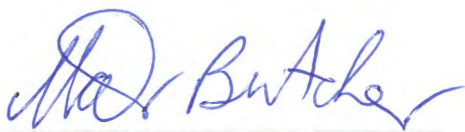
Our Modern Slavery Statement for the Financial Year 2024-25 was prepared under the *Modern Slavery Act 2018* (Cth) (the **Modern Slavery Act**). This Statement sets out our actions to assess and minimise risks of Modern Slavery in our operations and supply chains.

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**), is a private Australian-domiciled trustee and trust. Our statement is a joint statement on behalf of Land Services SA for entities which are reporting entities under the Modern Slavery Act and other controlled entities which are not reporting entities under the Modern Slavery Act but are included for transparency purposes (together the **LSSA Group**). Appendix 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. Appendix 2 to this Statement contains a list of the LSSA reporting entities and other controlled entities that do not meet the threshold for reporting entities under the Modern Slavery Act.

Unless explicitly provided otherwise, the information in this Statement provides a consolidated depiction of the LSSA Group's actions. This Statement applies for the following Reporting Period of 1 July 2024 to 30 June 2025 (the **Reporting Period**). Unless stated otherwise, all figures are for the financial year ending 30 June 2025.

Prior to Board approval, this Statement was reviewed and endorsed by the LSSA Executive. Consultation with controlled entities is set out in section 7. This Statement will be reviewed and updated annually or more frequently if needed to meet regulatory requirements.

This Statement, for the financial year ending 30 June 2025, 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 22 October 2025, which is acting as a higher entity under section 14(2)(d)(ii) of the Modern Slavery Act, approved the Statement for other LSSA Group entities. The Board has 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: 3 November 2025

2. INTRODUCTION

Purpose

Land Services SA was appointed as the exclusive service provider to the South Australian Government (the **State**) for a range of transactional land services and property valuation services previously delivered through the Lands Titles Office and State Valuation Office in October 2017. Since then, we have grown to provide important land and property services in South Australia and across Australia including:

- we help our clients with their property information data and system needs throughout Australia;
- we provide Information and Communication Technology (ICT) software development and consultancy services through our controlled entity Relational Data Systems Pty Ltd (RDS) in South Australia, Western Australia, Northern Territory and the Australian Capital Territory;
- we deliver a home-contents insurance calculator to most of Australia and New Zealand's insurers through our "Sum Insured" brand; and
- Land Services SA also partners with the Real Estate Institute of South Australia (REISA) to develop and maintain REI Master Forms, a real-estate industry property platform, Land Services SA delivers to REISA for use by its members.

All of this helps us work towards our vision of delivering highly valued and trusted services to the community and being recognised for the creation of innovative solutions. Backed by our values of **One Team, Respect, Integrity, Innovation, and Excellence**, we make this Statement by continuing to improve our management of Modern Slavery risks and complying with our regulatory obligations under the Modern Slavery Act.

LSSA is committed to the prevention of all forms of Modern Slavery including servitude, forced and compulsory labour, debt bondage 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 (collectively **Modern Slavery**). On the next page is the summary of the eight types of serious exploitation that LSSA provided its employees in its 2025 Modern Slavery Training.

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 our business operations and supply chains.

We are committed to continually improving our reporting under the Modern Slavery Act and strengthening our approach to identifying, managing, and mitigating Modern Slavery risks. In 2024–25, we took proactive steps to build on our previous commitments by enhancing employee training, making it mandatory for all new starters and requiring all employees to complete the training at least once annually. We also conducted a more thorough review of our supply chain by undertaking additional targeted supplier questionnaires and now requiring all vendors operating in high-risk countries to complete a Modern Slavery questionnaire as a compulsory part of our due diligence process.



3. OUR STRUCTURE, OUR OPERATIONS AND OUR SUPPLY CHAIN

Our Structure

In October 2017, the LSSA Group was appointed as the exclusive service provider to 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. Land Services SA has a range of wholly-owned entities that support the LSSA Group, these entities are listed in Appendix 2.

The ultimate owners of Land Services SA are institutional investors who either directly or indirectly through wholly owned subsidiaries own shares and units in Land Services SA. The institutional investors are:

- Australian Retirement Trust, one of Australia's largest superannuation funds, formed through the merger of Sunsuper and Qsuper with 2.3 million members and are an industry superannuation fund. Further information about Australian Retirement Trust is available at: www.australianretirementtrust.com.au.
- Macquarie Group Limited is a global financial services group operating in 34 markets and listed on the Australian Securities Exchange (ASX: MQG). Macquarie Group, through its subsidiary, Macquarie Asset Management has invested into Land Services SA. Further information about Macquarie Group Limited is available at: www.macquarie.com.
- PSP Investments is one of Canada's largest pension investment managers for members of the public sector pension plans of the federal public service, the Canadian Forces, the Royal Canadian Mounted Police and the Canadian Reserve Force. Further information about PSP Investments is available at: www.investpsp.com/en.

- HESTA is a specialist industry superannuation fund with deep connections to health and community services, having earned some of the super industry's highest accolades. Further information about HESTA is available at: www.hesta.com.au/members

The wholly-owned entities within the Land Services Group are within the control of the LSSA Group and 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 team. All LSSA entities are governed by the parent company's process and policies. The LSSA procurement policies and process apply across all LSSA entities, employees, contractors and third-parties engaged to act on behalf of LSSA. Additionally, LSSA's Code of Conduct which applies across the LSSA Group specifically calls out our commitment to acting ethically and steps we take to assist the global effort in reducing Modern Slavery.

Our Operations

The LSSA Group primarily consists of four key divisions: **Lands Titling; Valuations; Commercial; and Information Communication and Technology (ICT) Services**. These divisions are supported by an overall corporate division which includes Human Resources, Legal, Finance, Shared Services and a Customer Experience Team. Our diverse team supports our core business which is to provide a range of property transaction and valuation services, property information products, custom data sets, information technology systems and reliable market insights.

Our main services include:

- provision of property data and 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;
- property valuations in support of the South Australian Office of the Valuer-General; and
- ICT software development and consultancy services through RDS.

LSSA trades under the business names "Land Services SA" for its core services, "Sum Insured" for its home and contents insurance data services and "OneZeroOne" for its data commercialisation activities. RDS trades as its own entity. The logos of these three brands are:



In 2024-25, LSSA invested as a majority shareholder in a new joint venture REI Coinvest Pty Ltd (**REI Coinvest**). As at 30 June 2025, REI Coinvest had no employees and its assets consisted of property related software.

As at 30 June 2025, LSSA employed **249 employees**. LSSA's ICT division, comprising ICT support and development, is our largest division within the LSSA Group.



LSSA Group office locations and employee locations

LSSA employees, including those employed by RDS or under the banner of Sum Insured and OneZeroOne, work across Australia, with the majority of employees based out of our Registered Office, located at Level 9, 101 Grenfell Street, Adelaide, South Australia. Displayed on the adjacent map are LSSA Group offices where our employees are based.

LSSA's diverse business is highlighted through the varying roles that our employees undertake within our operations. These include:

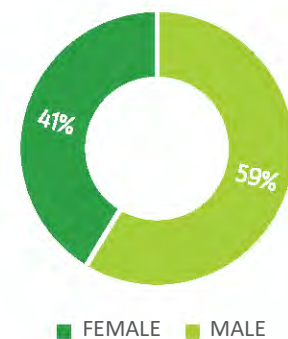
- ICT: Plan Lodgement Analyst, Internal Audit Officer, SysOps/DevOps Engineer, Data Capability Lead, Software Engineer, Business Analyst
- Valuations: Valuation Audit Lead, Valuation Administrator, Valuer and Senior Valuer
- Land Titling: Property Examiner, Division Officer, Registration Officer, Title Examiner
- Commercial Product Owner, Commercial Data Operations Lead, Business Development Manager, and Product Manager, and Marketing Manager.

LSSA recognises that our largest division, ICT, operates in a typically male dominated environment. However, LSSA is working to ensure, as much as practicably possible, that we employ from a diverse background including gender, ethnic and culturally diverse backgrounds.

Common Roles



Gender composition of workforce



For more information on LSSA's business and brands, please refer to the following websites: Land Services SA (www.landservices.com.au), Sum Insured (<https://suminsured.com.au/>), RDS (<https://relational.com.au/>), and OneZeroOne (<https://www.one0one.com.au/>).

Our Supply Chain

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, data commercialisation activities and ICT consultancy work. Our cost base is primarily comprised of people related costs and 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 **\$16,145,000** on goods and services procured from approximately 287 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 three years or on an ongoing basis. While we predominantly use Australian suppliers, we also use global suppliers in six 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 approximately **3.84%** representing an increase on last year (FY24: 1.5%) of all third-party vendor spend.

| Country | Percentage of Spend | Estimated prevalence of Modern Slavery (per 1,000 population) ¹ | Estimated number of people in Modern Slavery | Risk Rating ² |
|--------------------------|---------------------|--|--|--------------------------|
| Australia | 96.16% | 1.6 | 41,000 | Low |
| United States of America | 1.52% | 3.3 | 1,091,000 | Medium |
| India | 0.69% | 8 | 11,050,000 | High |
| United Kingdom | 0.44% | 1.8 | 122,000 | Low |
| China | 0.37% | 4 | 5,771,000 | Medium |
| New Zealand | 0.33% | 1.6 | 8,000 | Low |
| Singapore | 0.17% | 2.1 | 12,000 | Low |
| Canada | 0.16% | 1.8 | 69,000 | Low |
| Czech Republic | 0.13% | 4.2 | 45,000 | Medium |
| Belgium | 0.04% | 1 | 11,000 | Low |

Throughout the period, ICT expenditure again made up a significant proportion of total expenditure, accounting for 53.90% of total spend from external suppliers. The next major categories of expenditure were consulting (12.90%), employee services (8.30%) which includes select contractors, recruitment expenses, employee assistance programs and staff training, and Government expenditure (6.60%).

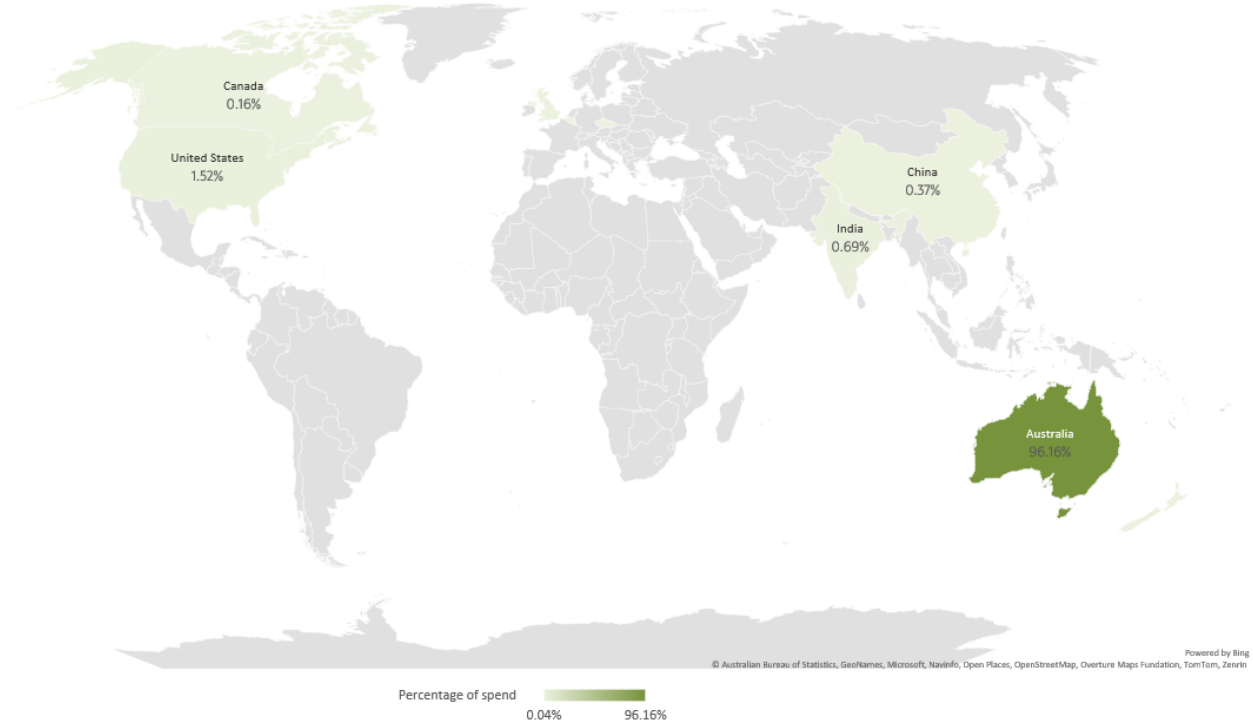
| Categories | Percentage of total spend | Categories | Percentage of total spend |
|-------------------|---------------------------|--------------|---------------------------|
| IT Services | 53.90% | Equipment | 0.80% |
| Consulting | 12.90% | Catering | 0.70% |
| Employee Services | 8.30% | Office Costs | 0.60% |
| Government | 6.60% | Trades | 0.30% |

¹ Walk Free Foundation, The Global Slavery Index 2023, Appendix 2, Table 26.

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).

| Categories | Percentage of total spend | Categories | Percentage of total spend |
|---------------------|---------------------------|------------------------|---------------------------|
| Rent | 5.70% | Employee Reimbursement | 0.20% |
| Accounting | 3.60% | Bank | 0.10% |
| Insurance | 2.80% | Electricity | 0.10% |
| Legal | 2.10% | Facilities | 0.10% |
| Domestic (internal) | 1.20% | | |

Global percentage of supplier expenditure



Overseas Expenditure by Country and Category



4. RISKS OF MODERN SLAVERY PRACTICES

LSSA recognises that Modern Slavery is a global issue and that Australia is not immune from its presence, including the potential for Modern Slavery within our operations and supply chains. The United Nations and Walk Free Foundation have estimated that there are approximately 50 million victims of Modern Slavery around the world.³ Preventing our own involvement in Modern Slavery forms part of our own commitment to operate a responsible and safe business and to understanding the critical South Australian economic infrastructure of which we are custodians.

Risk of Modern Slavery within Operations

VERY LOW

- Employee checks on right to work in Australia
- Modern slavery, bullying and harassment, and Code of Conduct training provided and mandatory for all employees
- Employee assistance and Whistleblower services provided to all employees

Risk of Modern Slavery within Supply Chains

LOW

- Most goods and services provided in Australia and low-risk countries
- Majority spend on ICT which is a higher-risk industry, but spend predominately in Australia
- Other higher-risk industries including catering and labor hire are almost all in Australia

LSSA takes a risk-based approach to the managing the risk of Modern Slavery within our **operations** and our **supply chains**. This is largely based on the types of goods and services we procure as well as the geographic region.

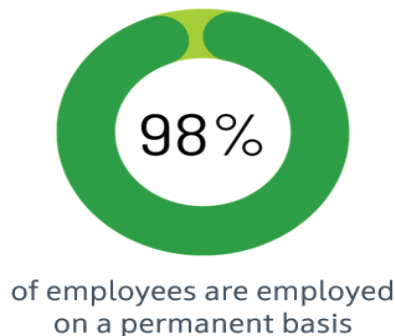
Modern Slavery Risks in Our Operations

As at 30 June 2025, LSSA directly employed 249 people, the majority, as noted, are full-time employees with most employed under individual employment contracts that meet or exceed the minimum legal entitlements in Australia. 98% of our employees are employed on a permanent basis, in either a full-time or part-time capacity.



LSSA values the diversity of our workforce and acknowledges that, in some contexts, this could increase exposure to Modern Slavery risks. However, all our employees are based in Australia, and the majority have attained some level of higher education. These factors mean that the risk of Modern Slavery occurring within our direct workforce is low.

In this period, we implemented the Right to Disconnect, which saw our staff gain enhanced knowledge about their obligations during work and non-working hours.



Throughout the financial year, we have sought to strengthen our employee protections by engaging in an improved employee remuneration benchmarking and objective setting. This allows a more transparent approach to remuneration and performance.

³ Ibid.

We take the wellbeing of our employees seriously, with all employees having access to an Employee Assistance Program and a Whistleblower service. As part of our employee onboarding, we confirm that all employees have a right to legally work in Australia and confirm their citizenship, visa or permanent residency.

At LSSA we continually aim to create a welcoming and inclusive environment. We have a number of policies, including our Flexible Work Policy, Additional Hours Policy, Diversity and Inclusion Policy, Reward and Recognition Policy, and Tenure Recognition Policy that collectively work to support our staff to feel empowered and to be their authentic selves to *Speak Up*. Our Workplace Discrimination, Harassment and Bullying Policy and Employee Grievance Policy address inappropriate workplace behaviour support employees affected by improper conduct.

All employees are required annually to complete a Code of Conduct sign-off which highlights the risks of Modern Slavery. Our Code of Conduct sets the broad standards expected of all employees, one of which is to not engage in Modern Slavery. Our employees also undertook Modern Slavery training which highlighted what Modern Slavery is, risk factors that may lead to Modern Slavery, and how to escalate suspicions of Modern Slavery. In this period, we updated our Modern Slavery training to highlight real-life examples of Modern Slavery in Australia.

Given this, the risks of Modern Slavery in our operations is, in our assessment, **very low**.

Modern Slavery Risks in Our Supply Chain

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.

Given that we exclusively operate within Australia, and after evaluating the specific risks associated with our sector, products, and services, LSSA faces lower risk levels compared to other industry counterparts who must report. Furthermore, while we do source software licences from medium-risk nations (specifically the United States of America and Czechia), these purchases represent a minimal risk of forced labour and are not among our highest-value transactions.⁴

This year, we have accepted more service providers from medium and higher risk countries. Having assessed these suppliers for Modern Slavery risks we note that there was only one supplier in the People's Republic of China, which we assessed as low risk as they are a professional legal services firm.

⁴ Walk Free Foundation, The Global Slavery Index 2023, Appendix 3, Table 40.

LSSA has outsourced certain software development and integration services, unrelated to the State services we provide, to a single global information technology consulting firm based in India. This supplier is our only service provider based in India. Prior to commencing any new project or scope of work, the supplier was required to complete our Modern Slavery Questionnaire, and due diligence was conducted on their employees, including background checks. Throughout the engagement, LSSA maintained direct interaction with the supplier's employees, allowing us to monitor operations closely. As part of preparing this Statement, we confirmed with staff who directly engaged with the supplier that they had no reason to believe Modern Slavery risks were present. These measures form part of LSSA's ongoing approach to identifying and mitigating Modern Slavery risks within our supply chain. We acknowledge, and are working to understand, the vulnerabilities and potential risks with those suppliers whose global operations pose an increased susceptibility to Modern Slavery supply chain issues.

LSSA recognises that the area within our supply chains that has a heightened risk of Modern Slavery arises from the procurement of ICT services and equipment. Most of our ICT service providers supply specialised technical advice within Australia, employing predominantly Australian-based staff who are highly educated and, we assume, are appropriately remunerated. However, we acknowledge that the procurement of ICT equipment carries inherent Modern Slavery risks, including in the manufacturing of the products and in the upstream supply chains of components. Given the complexity of global electronics supply chains, it is not currently feasible for LSSA to investigate the full details of the manufacturing processes or component sourcing of our ICT equipment suppliers.

LSSA recognises the risk of conflict and turmoil on Modern Slavery. We discuss our approach to the prevalence of Modern Slavery as a result of conflict in section 5.

While we predominantly use Australian suppliers, 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. Further, as we look to external parties for additional ICT support, including in India, we recognise that the risk of Modern Slavery increases. Accordingly, even though LSSA's risk profile of Modern Slavery in our supply chains has increased, we still assessed through the LSSA Group's risk management framework, that LSSA Group's Modern Slavery risk in our supply chains remains as a **low** risk.

5. OUR APPROACH TO TACKLING MODERN SLAVERY PRACTICES

We take a multi-layered approach to managing Modern Slavery risks across our business, centred on our corporate governance framework and supported by our systems, processes, policies, and procedures. This includes group-wide policies, management and operating procedures, our defined enterprise risk appetite, and our overarching Risk Management Framework.

Corporate Governance Framework

Board

The Board provides overall strategic direction and establishes the risk appetite for the LSSA Group through the Risk Committee. It also maintains oversight of the organisation's risk culture, supported by regular reporting from the Executive to both the Board and the Risk Committee.

With respect to Modern Slavery, the Board's responsibilities include reviewing and monitoring risks identified by the Executive, overseeing the organisation's approach to managing those risks, and approving this Statement on an annual basis.

Executive

LSSA operates an enterprise risk management framework that provides a consistent methodology for identifying, analysing, evaluating, treating, monitoring, and reporting risks across all levels of the organisation. The Executive, led by the Chief Executive Officer, is responsible for:

- overseeing, reviewing, and enhancing the effectiveness of our approach to managing Modern Slavery risks within our operations and supply chain; and
- ensuring that appropriate systems are in place to manage and mitigate these risks effectively.

Further details on the systems, processes, policies, and procedures we have implemented to operationalise these responsibilities are provided below.

Employees

Our Code of Conduct applies to all Employees and establishes the expectation that every person is treated with respect and dignity. It reinforces our commitment to comply with all applicable laws and to act ethically and with integrity, including a zero-tolerance approach to Modern Slavery practices. All employees are required, both at onboarding and throughout their employment, to familiarise themselves with the Code of Conduct and the Whistleblower Protection Policy, and to complete training on the Code. Employees must annually reaffirm their commitment to the Code of Conduct and complete the associated training. In FY25, all staff undertook Code of Conduct training and Modern Slavery Training. Each new employee is required to undertake Modern Slavery Training.

Our Whistleblower Protection 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.

Our Systems, Processes, Policies, and Procedures

We have implemented policies designed to identify, assess, and mitigate the risks of Modern Slavery within our operations. These policies apply to all LSSA Group entities and are approved in accordance with our internal Delegations of Authority Policy. Our key systems, processes, policies, and procedures for addressing Modern Slavery risks include:

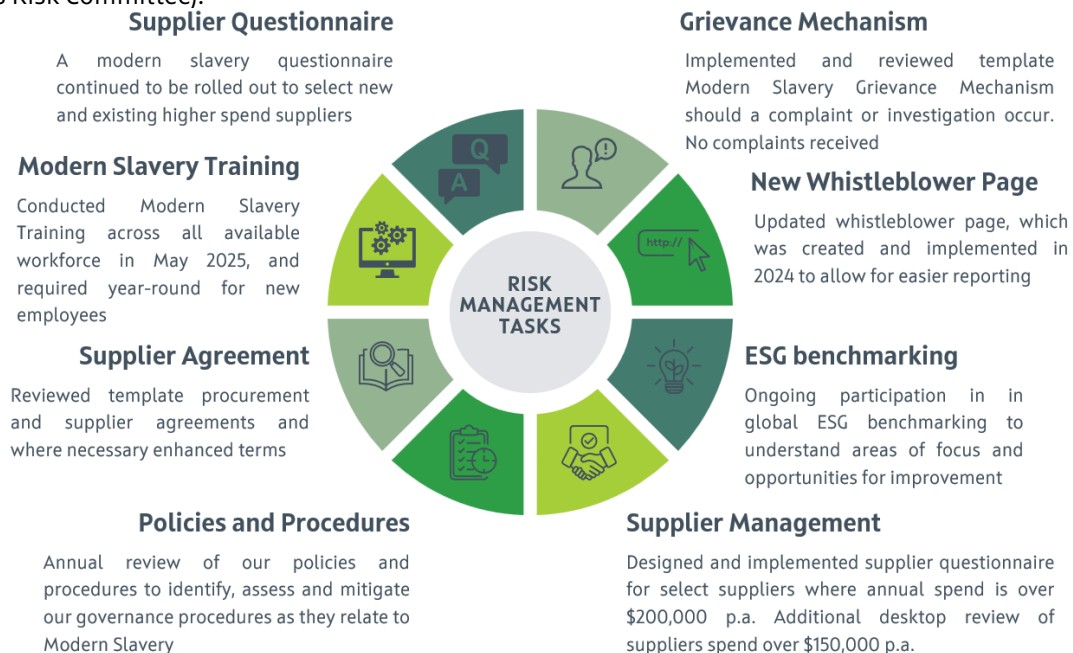
- **Code of Conduct:** LSSA's Code of Conduct reinforces LSSA's position on human rights and Modern Slavery. All employees are expected to abide by the spirit, as well as the strict requirements, of the Code of Conduct and applicable policies and procedures – employees are expected to ask not just “can 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 mandatory component of new employee inductions. The Code of Conduct is reviewed at a minimum annually and was comprehensively updated in this period. This builds on enhancements made to the Code of Conduct in the preceding period. As noted in last year's Modern Slavery Statement, LSSA expanded our Code of Conduct training with a bespoke interactive module, and a new 10 question Code of Conduct quiz which employees are expected to satisfactorily complete to confirm understanding. This year, we built on this and ensured that it was updated and remained relevant. All employees successfully completed our Code of Conduct training, and attested and affirm that they understood the Code of Conduct.
- **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 and our work, health and safety policies (including our Diversity and Inclusion Policy and Workplace Discrimination, Harassment and Bullying Policy).
- **Our template agreements:** Our template agreements have Modern Slavery clauses which align with accepted practice. These are reviewed annually for appropriateness having regard to any evolving Modern Slavery risks within our supply chain. Minor changes were made to these agreements to ensure they remained compliant. Further, LSSA's in-house legal team, where appropriate and possible, attends continuing professional development or industry sessions on Modern Slavery.
- **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. Where appropriate, LSSA requires our suppliers to provide evidence pre-employment screening, adherence to employment conditions and background checks.
- **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 in which staff feel comfortable raising issues or concerns and do not experience detriment for speaking up. In 2024, LSSA implemented the Right to Disconnect which included the internal publication and promotion of our Afterhours Disconnection Policy. The ability for staff to *Speak Up* 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.

- Modern Slavery Training:** In 2024, LSSA implemented a new Modern Slavery training designed specifically for LSSA employees. It is compulsory for all new employees to complete the Modern Slavery Training, and for all employees to undertake refresher training each year. In 2025, we updated our Modern Slavery Training to ensure that it remained relevant and current. The 2025 Modern Slavery Training was focussed on current examples of Modern Slavery in Australia to highlight the prevalence of Modern Slavery in Australia. We are proud that in the current reporting period, all available employees completed this training. This training aimed to help ensure our people understood what Modern Slavery is, how to identify risks of Modern Slavery, and how to appropriately escalate suspicions 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 "*Looking Ahead*" for future activities planned for the next Reporting Period. In 2024, LSSA implemented our template Grievance Mechanism to address any Modern Slavery matter that arises within our operations or supply chains. We have reviewed our template Grievance Mechanism and are of the view that it is still fit for purpose. No issues were raised that required its use. Further details about the creation of our Grievance Mechanism are available in our 2023-24 Modern Slavery Statement.

Modern Slavery Risk Management in the Reporting Period

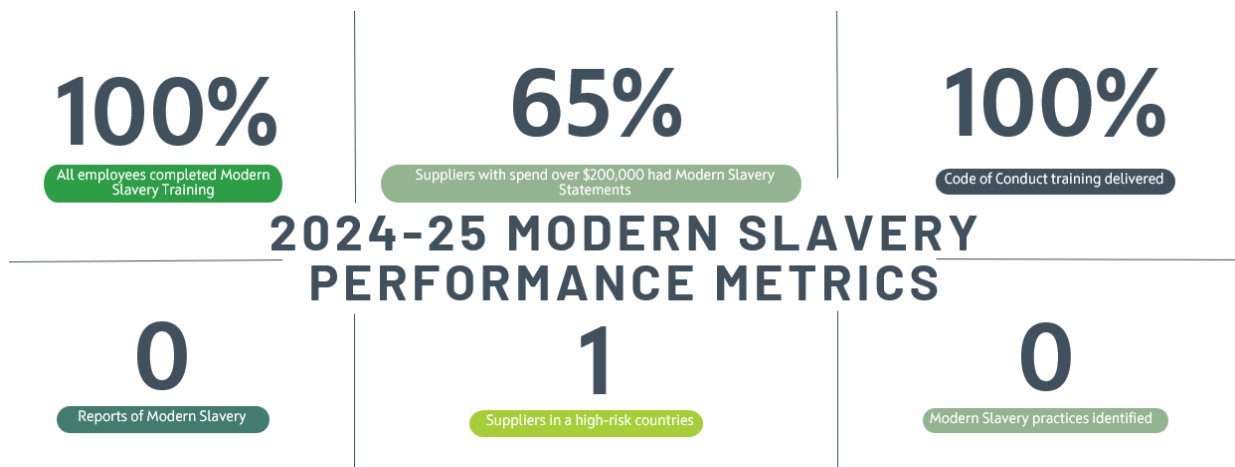
During the Reporting Period LSSA successfully met our committed tasks for 2024-2025 and, in some cases, exceeded those tasks. These were in addition to Modern Slavery risks being considered as part of our enterprise risk management framework (including regular review of risks and controls and reporting to LSSA's Risk Committee).



Assessing and Reporting on Effectiveness

During the reporting period LSSA has not identified any actual or potential cases of Modern Slavery practices within its operations and supply chains.

During this period over 65% of suppliers, where spend was over \$200,000 per annum, were identified to have published a current, Modern Slavery statement. For the remaining 35% we conducted desktop reviews and sent supplier questionnaires where possible. Of those who did not have a Modern Slavery statement, where appropriate, LSSA sought that they completed our Modern Slavery Supplier Questionnaire. LSSA will continue to evolve how we measure our effectiveness of mitigating Modern Slavery in our supply chains and operations. We also required the supplier in India to complete multiple Modern Slavery Questionnaires. LSSA will continue to 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.



Modern Slavery risks and the Ukraine and Middle East conflict

The global impacts of conflict and humanitarian crises, such as the war in Ukraine and the ongoing crisis in Israel and Palestine, have heightened the risks of Modern Slavery across global supply and value chains. Large-scale displacement, destruction and loss of livelihoods create conditions where vulnerable people are at greater risk of Modern Slavery, specifically trafficking, forced labour, and exploitative recruitment practices. While LSSA does not operate in or directly source from these regions, we recognise that global supply chain disruptions and sanctions may indirectly expose our supply chain to heightened Modern Slavery risks. However, we recognise that this risk, for LSSA remains low, but one that we need to be vigilant of.

6. LOOKING AHEAD

Our Progress

LSSA is committed to mitigating the risk of Modern Slavery in our operations and supply chains. We recognise that in 2024, there was a significant uplift in our approach to dealing with the risk of Modern Slavery in our operations and supply chains, this included compulsory staff training, Modern Slavery template grievance mechanism, and a supplier questionnaire. We are cognisant that in this period we focussed on solidifying our approach. Additionally, we look to continually review, update and enhance our policies and procedures. While we must look ahead, we must also recognise our achievements. In the 2023-24 Modern Slavery Statement, LSSA set ambitious tasks to further mitigate the risk of Modern Slavery in our operations and supply chains. LSSA is pleased that it has successfully achieved the outcomes it set for itself in the 2024-25 Reporting Period.

Progress against 2024-25 goals

Supplier Agreement Review

We reviewed our agreements to ensure they were current and up-to-date

Expanded Training

We successfully ensured that all new employees complete our modern slavery training as part of their induction

Review and Enhanced Policies

LSSA reviewed our policies as they related to modern slavery and made it easier for our people to *Speak Up* and raise a Whistleblower concern. We continued to transition to a new Company wide policy portal



Supplier Questionnaires

While we did not receive a response back against all suppliers with spend over \$200,000 who did not have a Modern Slavery Statement, we did ensure that each supplier in a high-risk country completed a questionnaire

ESG Benchmarking

We continued to actively participate in global ESG benchmarking, and successfully increased our score on previous years

Modern Slavery Complaints

LSSA reviewed our *Speak Up* and Whistleblower mechanisms to allow for easier reporting building on our work in FY24. There were no modern slavery grievances raised in FY25

Our Future Commitments

LSSA recognises that we must continue to build on our previous achievements and look to continually mitigate the risk of Modern Slavery within our supply chains. However, we recognise that we are in a period of consolidation during which we look to continue to embed our culture of compliance within the organisation and build awareness around the risks of Modern Slavery in our operations and supply chains. Broadly, our higher-level objectives are divided into more training, more supplier questionnaires and enhanced compliance. We discuss these in more detail in the table below.



Enhanced training

Ensure our modern slavery training continues to be included as part of new employees induction



Expand questionnaires

Ensure that more suppliers complete the new supplier questionnaire



Continue Ongoing Compliance

Continue our ongoing compliance including updating policies, and reviewing agreement



Gap analysis

Undertake a gap analysis on other similar entities to understand potential deficiencies

Given our commitment to taking proactive steps to mitigate the risk of Modern Slavery within our supply chains and operations, we set the following goals.

| Goal | Description | Status | Future Goal |
|--------------------------------|--|---------|---|
| Modern Slavery Training | Continue to ensure that the annual Modern Slavery training is included as part of all new employees induction, and that annually all staff complete Modern Slavery Training. | Ongoing | For reporting in FY26 Reporting Period. |

| Goal | Description | Status | Future Goal |
|-------------------------------------|---|---------|---|
| Questionnaires | <p>Expand the use of Modern Slavery questionnaires to be mandatory for:</p> <ul style="list-style-type: none"> suppliers in high-risk countries; and for suppliers with whom LSSA has an annual spend of over \$200,000 and who do not have a Modern Slavery statement. | Ongoing | For reporting in FY26 Reporting Period. |
| Supplier Management | <p>Continue to undertake desktop reviews of our suppliers (in high-risk categories) both current suppliers and when on-boarding.</p> <p>Ensure that the Key Supplier Management Policy is reviewed.</p> <p>Confirm that our contracts with key suppliers address Modern Slavery.</p> | Ongoing | For reporting in FY26 Reporting Period. |
| Template Supplier Agreements | <p>Annual review of our template procurement and supplier agreements and where necessary enhance terms (including, where relevant from a risk perspective, requiring suppliers to maintain records in relation to their supply chains and provide any information relating to any developed supplier questionnaires so that we are assured that there are no Modern Slavery practices present in their business or supply chain).</p> | Ongoing | For reporting in FY26 Reporting Period. |
| Policies and Procedures | <p>Annual review of our policies and procedures (including enhancing where necessary), to enable our key people to identify, assess and mitigate the risks of Modern Slavery practices in our enterprise and supply chains. Ensure that policies and procedures are more standardised across the organisation.</p> | Ongoing | For reporting in FY26 Reporting Period. |
| ESG Benchmarking | <p>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.</p> | Ongoing | For reporting in FY26 Reporting Period. |
| Modern Slavery Complaints | <p>Monitor and respond to any complaints received by employees, customers, suppliers, contractors or third parties, including through the Whistleblower Protection Policy.</p> | Ongoing | For reporting in FY26 Reporting Period. |

7. CONSULTATION WITH OTHER ENTITIES

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. Each LSSA Group entity has the same Company Secretary.
- LSSA has embedded 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.

Additionally, in preparing this Modern Slavery Statement, LSSA consulted across the LSSA Group through the legal team, as well as through our executive management and senior leaders who operate in a centralised process.

Each director within the LSSA Group has reviewed this Modern Slavery Statement as part of our consultation process. Accordingly, all entities within the LSSA Group, including entities which are Reporting Entities, were engaged in the development of this statement, are aware of their obligations under the Modern Slavery Act and have been consulted as part of the preparation and submission of this Statement.



APPENDIX 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.

| Mandatory Criteria | | LSSA Modern Slavery Statement | Page Reference |
|--------------------|--|--|----------------------|
| 1. | Identify reporting entity. | About our Modern Slavery Statement Appendix 2 | 1 18 |
| 2. | Describe the reporting entity's structure, operations, and supply chains. | Introduction Our Structure, Our Operations and Our Supply Chains | 2 to 3 3 to 7 |
| 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 | 8 to 10 |
| 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 | 10 to 14 |
| 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 Looking Ahead: Our Progress | 10 to 14 14 to 15 |
| 6. | Describe the process of consultation with any entities the reporting entity owns or controls. | About our Modern Slavery Statement Consultation with other entities | 1 18 |
| 7. | Any other information that the reporting entity, or the entity giving the statement, considers relevant. | Looking Ahead: Our future commitments | 14 to 16 |

APPENDIX 2: LAND SERVICES ENTITIES

Reporting Entities:

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 Operating Pty Ltd ACN 618 229 815, as trustee for the Land Services SA Operating Trust (ABN 86 836 650 939)

Other Entities (Non-reporting):

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 Limited ACN 616 548 031

Relational Data Systems Pty Ltd ACN 114 514 037