

# Sunland Group

ESTABLISHED

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## **Modern Slavery Statement 1 July 2019 – 30 June 2020**

Sunland Group Limited and its wholly owned subsidiaries (“the Group” or “Group”) are a reporting entity under Modern Slavery Act 2018 (C’t) (“the Act”). Sunland Group Limited is a company incorporated in Australia and listed on the Australian Securities Exchange. This is a joint report of Sunland Group Limited and subsidiaries which operate with a centralised management structure.

### Structure, operations and supply chains

The Group operates a property development business in Queensland, Sydney and Melbourne through the parent company, and incorporated subsidiaries. More information on the Group’s material subsidiaries can be found in the Groups most recent financial statements located on the Group’s [website](#). The Group’s products comprise of:

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

The group’s in-house operations are conducted by approximately 55 employees and include:

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

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

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

### Risks of modern slavery practices in operations and supply chains

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

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

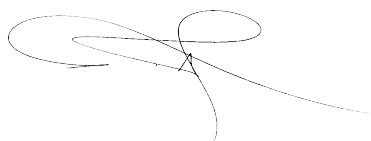
#### Response to risks of modern slavery practices

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

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

The effectiveness of these actions and practices are addressed on a continuous basis with the Group responding where evidence is found that there are suppliers exhibiting practices which are inconsistent with our approach to addressing the risk of modern slavery. Evidence brought to our attention by staff, media reports, regulatory agencies or law enforcement are taken seriously and acted upon promptly.

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



Sahba Abedian  
Managing Director  
25 March 2021