



Landcom Modern Slavery Statement

The following disclosures are made in accordance with the Modern Slavery Act 2018 (Cth). Landcom meets the threshold for a reporting entity, as outlined in the Act. This Statement has been approved by the Landcom Board, in its capacity as the principal governing body of Landcom, on 30 September 2022.

Landcom chooses to include its required Statement as a component of our annual Sustainability Report, which also provides comprehensive details on our approach to Human Rights.

This Statement provides an overview of Landcom's approach and response to the Mandatory Criteria outlined in the Act. For further detail on Landcom's approach to modern slavery, including our commitment to continuous improvement, refer to our [FY22 Sustainability Report Accountable & Collaborative Places Overview \(p. 63\)](#).

This Statement is signed by Alex Wendler in his role as the Chief Executive Officer of Landcom on 30 September 2022.



Alexander Wendler
Chief Executive Officer, Landcom

Mandatory Criteria	Landcom Response
Criteria 1: Identify the reporting entity.	This Statement covers Landcom as the reporting entity.
Criteria 2: Describe the structure, operations and supply chains of the reporting entity.	<p>Structure</p> <p>Landcom is a NSW Government State Owned Corporation, created by the <i>Landcom Corporation Act 2001 (NSW)</i>.</p> <p>Landcom sits within the NSW Department of Planning & Environment cluster, but is not part of a larger corporate group of entities, and does not control or own any other entities.</p> <p>Landcom annual disclosures regarding Ownership and Legal Form are presented in our FY22 Sustainability Report Appendix F: GRI Content Index, indicators 102-05 (p. 102).</p> <p>Landcom’s operations are based in New South Wales with a main office in Parramatta and a secondary office in Sydney CBD. During FY22, Landcom had 13 project sites located across NSW, in Greater Sydney and the mid-North Coast. Landcom had 175 employees. This is comprised of 161 full time employees and 14 part time staff.</p> <p>Landcom’s annual disclosures regarding Information on Employees and Other Workers are presented in our FY22 Annual Report (p. 48).</p> <hr/> <p>Operations</p> <p>Landcom is the NSW Government’s property development organisation. Landcom’s leadership intent is to create more affordable and sustainable communities.</p> <p>We act as a master developer, developer and builder where appropriate. This includes partnerships with NSW Government departments and external commercial entities to maximise our impact for the benefit of NSW.</p> <p>As a masterplan developer we use a variety of structures to deliver projects. The key types of project structures that we use are:</p> <ul style="list-style-type: none"> • Owner/Master Developer • Project Delivery Agreement (PDA) • Reverse Project Delivery Agreement (RPDA) <p>For further information on these types of structures, and a map of our current projects refer to FY22 Sustainability Report Reporting Boundaries (p. 8) Other corporate operations that complement our development projects include research and development investment facilitated by the Landcom Sustainability & Learning team. Landcom does not have any formal charitable interactions.</p> <p>Landcom adopted a Modern Slavery Management Plan in FY20 in consultation with industry experts, which guides our approach to identifying, managing and remediating the impacts of modern slavery. Progress on the plan is reported monthly to the Landcom Executive Committee and quarterly to the Landcom Board. For further information refer to our Human Rights Performance in our FY22 Sustainability Report (p. 69).</p>

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<p>Criteria 2: Describe the structure, operations and supply chains of the reporting entity.</p> <p>Continued</p>	<p>Supply Chains</p> <p>Products provided by suppliers</p> <p>Products provided to Landcom are predominantly corporate in nature, such as office furniture and supplies, and basic kitchen amenities such as tea and coffee for staff.</p> <hr/> <p>Services provided by suppliers</p> <p>Landcom engaged just over 600 direct Tier One suppliers during FY22 and less than one percent of these suppliers were based outside of Australia.</p> <p>Landcom’s main supply chain consists of services provided by suppliers that enable master development and building projects. This can be split into two generalised categories of:</p> <ul style="list-style-type: none"> • Corporate services: includes but is not limited to legal and specialist consultant services related to the planning and development of land. • Project development services: includes but is not limited to services at project development sites such as principal contracting, civil and landscape services. <hr/> <p>Products and services used by indirect suppliers in supply chains</p> <p>Indirect products and services related to Landcom’s operations include but are not limited to corporate services (e.g. specialist consultants and their labour force), project development sub-consultant services provided to principal contractors, and raw or manufactured materials and machinery that enable development works to occur.</p> <p>Landcom’s annual disclosures regarding Supply Chain, including our Management Approach and Performance Targets are presented in our FY22 Sustainability Report at (p.69), or refer to our GRI disclosures 102-08 (p. 102).</p>

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<p>Criteria 3: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity.</p>	<p>The property and construction industry has extensive supply chains that can extend to multiple, international tiers. By undertaking a Human Rights and Modern Slavery Salience Assessment, along with internal assessments of modern slavery risks, work with the Property Council of Australia (PCA) Modern Slavery Working Group and consultation with experts, Landcom has identified the following areas as areas of risk for our business:</p> <ul style="list-style-type: none"> • Cleaning (operational - offices, and supply chains sites and operations) • Security • Catering • IT and telecommunications • Potential forced labour risks within renewable energy supply chains • Potential forced labour risks within specific materials supply chains such as stone, bricks, rubber soft fall and concrete • Potential forced labour risks within finishing trades within projects, developments and communities • Potential forced labour risks highlighted within specific countries and sectors e.g. North Korea, China for protective PPE wear and uniforms. <p>In FY22 we have tested these risk areas within our own supply chain further, by adopting prequalification thresholds that require suppliers with a contract over \$150,000 to sign into the Property Council Australia Supplier Platform (PCA Platform) and complete a risk questionnaire. The platform, of which we are a founding member allows Landcom to collect key data points relevant to modern slavery risks from our suppliers via a questionnaire that must be updated annually.</p> <p>As Landcom outsources most project related construction, our key risk lies with our suppliers and their supply chains. From data obtained from the PCA Platform, Landcom has identified several areas as high risk among our suppliers. These risks are linked to manufacturing or sourcing materials and products from overseas, as well as supplier operations in countries overseas that have a high risk of modern slavery occurring. As a high volume of Landcom suppliers engage sub-contractors, labour hire practices among our suppliers also presents as high risk. Suppliers on the PCA Platform have listed manufacturing products or maintaining operations in countries flagged as high risk for instances of modern slavery.</p> <p>There are also identified risks amongst suppliers who source, via their supply chain, manufactured products or services from countries including: China, India, Philippines, Thailand, Indonesia, Myanmar and Bangladesh. Landcom understands that certain materials used in our construction are linked to some of these countries including bricks and rubber from China and Asia Pacific, cement from Indonesia and stone from India and Pakistan.</p> <p>Landcom has identified the need to investigate these risks further as part of our FY23 approach to mitigating Modern Slavery risk in our supply chain and operations.</p>

Mandatory Criteria	Landcom Response
<p>Criteria 4: Describe the actions taken by the reporting entity to assess and address those risks, including due diligence and remediation processes; and</p>	<p>A range of actions have already been undertaken, or are planned, as part of our commitment to continuous improvement. They include:</p>
<p>Criteria 5: Describe how the reporting entity assesses the effectiveness of such actions.</p>	<p>Where we are today</p> <p>Adopted a Human Rights Statement that is publicly available on Landcom’s website.</p> <p>Continued to deliver against our Modern Slavery Management Plan (adopted in FY20) which guides our approach to the identification, management and remediation of modern slavery.</p> <p>Embedded modern slavery clauses into our contracts, tailored to the level of risk and supplier sophistication. Clauses prescribe that suppliers are not to breach modern slavery laws and outlines the risk mitigation approaches suppliers are expected to adhere to when engaging in works for Landcom. These clauses extend to supplier operations and supply chains.</p> <p>Continued as a founding consortium member for the Property Council of Australia Supplier Platform, designed to engage multitiered supply chain and assess for risks of modern slavery.</p> <p>From this platform Landcom improved visibility of suppliers’ risk factors including identifying the following insights for Landcom suppliers who completed the assessment during FY22³⁸:</p> <ul style="list-style-type: none"> • 73% were not reporting entities under Modern Slavery legislation and a further 12% had not prepared a Statement but were planning to do so within the next 12 months • 51% used sub-contracting or third-party recruitment organisations • 1% have “a long chain of labour recruiters” and 3% pay high recruitment fees (above 20% of the positions annual remuneration) • 4% say that key stakeholders in their organisation do not understand the basic facts around the issue of ‘Modern Slavery’, with a general awareness of where modern slavery may exist in their Australian and/or international supply chains, and 3% are “not sure” if key stakeholders in their organisations understand the basic facts around modern slavery • 31% say that they have not assessed the risks relating to modern slavery in their operations and supply chains, and a further 10% say they have not assessed the risks but plan to do so within the next 12 months • 11% say they do not have a grievance mechanism or process in place that provides an opportunity for employees, suppliers and the ‘voice of the worker’ to be heard and have no plans to develop one, and a further 17% plan to develop a grievance mechanism within the next 12 months • 11% say their organisation or their labour hire provider recruits employees or workers from overseas, such as temporary or casual migrant workers, whilst a further 6% of suppliers say they are unsure if they do so. <p>Continued monthly engagement with the Property Council Modern Slavery working Group and participated in the review of the groups Modern Slavery Statements to inform best practice approach. Landcom also participated in a review of an industry led report on grievance mechanisms and as part of the consortium, engaged with subject matter experts throughout the year including emerging trends in supply chain risk.</p> <p>Improved the process for managing supplier pre-qualification requirements by directly linking it to the Procurement function within Landcom. The Procurement team now ensure that all relevant suppliers (contract values over \$150,000) have completed the PCA Platform assessment prior to executing contracts.</p>

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<p>Criteria 4: Describe the actions taken by the reporting entity to assess and address those risks, including due diligence and remediation processes; and</p> <p>Criteria 5: Describe how the reporting entity assesses the effectiveness of such actions.</p> <p>Continued</p>	<p>Where we are today</p> <p>Continued to monitor the implementation of Landcom’s modern slavery automated incident notification protocol, available to staff and Landcom contractors via Landcom’s OHS system Integrum.</p> <p>Updated compulsory modern slavery training for all Landcom staff which built on the initial training rolled out in FY21 that covered an introduction to modern slavery. The updates included additional context of modern slavery risk within the construction industry and further detail on how to access grievance mechanisms for reporting instances of modern slavery (available to staff and contractors) via Landcom’s OHS system Integrum.</p> <p>Adopted a new grievance mechanism which was communicated to staff as part of the modern slavery training and allows for anonymous reporting of modern slavery incidents internally via a bespoke Fraud, Corruption & Modern Slavery Notification Box. The box is monitored monthly by a single member of the legal team and reported to the Executive General Manager, Legal & Compliance.</p> <p>Continued regular internal working group meetings to inform Landcom’s implementation of the Management Plan. Progress on actions within the Management Plan are reported to the Executive Committee monthly and to the Board quarterly. Modern Slavery. Working group members include:</p> <ul style="list-style-type: none"> • Executive General Manager Communications & Policy • Director Sustainability & Learning • Director Commercial • Solicitor, Right to Information and Projects • Social Sustainability & Partnerships Manager. <p>Landcom aims for steady improvement within its business operations. This means engaging and educating suppliers around key topics like Modern Slavery. As part of the tender process, Landcom now requires all major contractors to be members of the Supply Chain Sustainability School. Contractors can then complete a short series of free learning modules on Modern Slavery.</p> <p>Assessing effectiveness</p> <p>Engaged two independent experts to provide guidance for continuous improvement and strategic advice on our Modern Slavery Management Plan.</p> <p>Monitored and verified supplier PCA Platform Modern Slavery Assessments submitted by suppliers who were required to complete the platforms Modern Slavery Assessment. The completion of the assessment is part of Landcom’s pre-qualification obligations for procurement in addition to the requirement for suppliers signing up to the Supply Chain School training. (See Human Rights Performance Results p. 69 for more detail).</p> <p>The new process implemented for verification of completion on the Supplier Platform is now the responsibility of the Procurement team and supplier engagement on the outlined requirements is mandatory prior to contract execution.</p>

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<p>Criteria 4: Describe the actions taken by the reporting entity to assess and address those risks, including due diligence and remediation processes; and</p> <p>Criteria 5: Describe how the reporting entity assesses the effectiveness of such actions.</p> <p>Continued</p>	<p>Future priorities</p> <ul style="list-style-type: none"> • Continue to deliver on our Modern Slavery Management Plan including implementing actions to enhance our grievance mechanisms in order to reach a broader audience of sub-contractors and develop an appropriate remediation approach. As part of this work, we will continue to engage independent experts to inform our approach. • Continue to be actively involved with the Property Council Modern Slavery Working Group and participate in projects which are guided by academics and industry experts such as the afore mentioned review of Modern Slavery Statements. • Formulate an engagement plan with tier one high risk suppliers to understand their level of Modern Slavery risk and management maturity and collaborate to increase transparency of their own supply chains. In FY23 the focus in this area will be on using the data obtained from supplier disclosures via the PCA platform to build an awareness of risks posed by products sourced overseas and engage with suppliers to understand the level of due diligence they undertake to help inform our remediation approach. • Progressively expand our engagement and collaboration to medium and low risk suppliers. Explore the merit and opportunity to broaden the scope of suppliers required to complete the PCA platform modern slavery assessment beyond the current requirement of contracts exceeding the current \$150,000 threshold. • Continue to improve existing modern slavery disclosures and requirements from entities that purchase Landcom projects to support a comprehensive risk and reputation management approach (noted this is beyond the scope of the Act).
	<p>Landcom’s annual disclosures regarding Modern Slavery, including further detail on our Management Approach, supply chain engagement, and continuous improvement are presented in our FY22 Sustainability Report at Accountable & Collaborative Places Overview (p. 63), and Appendix F: GRI Content Index, indicators GRI 408 – 412 and UN Global Compact Principles 1-5 (p. 102).</p>
<p>Criteria 6: Describe the process of consultation with any entities the reporting entity owns or controls.</p>	<p>This criterion does not apply to Landcom, as the organisation has no additional owned or controlled entities. We continue to engage within our organisation, industry and our supply chain as disclosed.</p>
<p>Criteria 7: Include any other information that the reporting entity considers relevant.</p>	<p>Landcom continues to proactively manage the risks of modern slavery within our operations and supply chain. We are committed members of the United Nations Global Compact, report our contribution to the Sustainable Development Goals, and have been addressing Human Rights and Modern Slavery as part of our Sustainable Places Strategy since 2017.</p> <p>Throughout FY22 our commitment to continuous improvement regarding modern slavery did not experience any material impacts from COVID-19.</p> <p>Landcom’s annual disclosures regarding Modern Slavery, including further detail on our Management Approach, supply chain engagement, and continuous improvement is presented in our FY22 Sustainability Report (p. 69).</p> <p>Landcom’s contribution to the Sustainable Development Goals, including those related to Human Rights, is presented within our FY22 Sustainability Report at Appendix D: Sustainable Development Goals Alignment (p. 90).</p> <p>Landcom’s United Nations Global Compact ‘Communication on Progress’ disclosures are presented within our FY22 Sustainability Report at Appendix F: GRI Content Index (p. 102).</p>