

Landcom Modern Slavery Statement

The following disclosures are made in accordance with the Commonwealth Modern Slavery Act 2018.

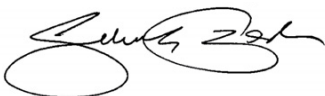
Landcom meets the threshold for a reporting entity, as outlined in the Act. This Statement has been approved by the Landcom Board, and signed by John Brogden Chief Executive Officer.

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 Modern Slavery Statement is third party assured against the requirements and criteria set out in the Act.

Content in this Statement is set out to provide an overview of Landcom's approach and response to the Mandatory Criteria outlined in the Act. For further detail on Landcom's approach Modern Slavery, including our commitment to continuous improvement, refer to our FY21 Sustainability Report [Accountable & Collaborative Places Overview](#).

Links to Global Reporting Index, United Nations Global Compact or other related content within the body of the FY21 Sustainability Report are also provided, in order to give the reader access to relevant or complementary detailed content in respect to Landcom's management of Human Rights and Modern Slavery.



John Brogden AM
CEO, 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 Landcom Corporation Act 2001.</p> <p>Landcom sits within the NSW Department of Planning & Environment cluster, however 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 is presented in our FY21 Sustainability Report APPENDIX F: GRI Content Index, disclosure 102-05.</p> <p>Landcom's annual disclosures regarding Information on Employees and Other Workers is presented in our FY21 Sustainability Report APPENDIX F: GRI Content Index, disclosure 102-08.</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 to achieve outcomes for our stakeholders. This includes partnerships with the NSW Government departments and external commercial entities to maximise our impact for the benefit of NSW communities.</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) • Joint Ventures (JV) <p>For further information on these types of structures, and a map of our current projects refer to FY21 Sustainability Report Reporting Boundaries. Other operations that complement, however may not be specific to a particular development project, includes research and development investment via Landcom's Roundtable (refer to Research Investment).</p> <p>Landcom does not have any formal charitable interactions.</p> <hr/> <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'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 related 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 is presented in our FY21 Sustainability Report, or refer to our GRI disclosure 102-08.</p>

Mandatory Criteria	Landcom Response
<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 Saliency Assessment, Landcom has initially identified supply chain forced labour and materials sourcing as the dominant areas of risk to modern slavery.</p> <p>In FY21 we have tested these risk areas further, by onboarding a number of civil and landscape suppliers to the Property Council Supplier Platform, of which we are a founding member. The platform allows Landcom to collect key data points relevant to modern slavery risks from our suppliers, via a questionnaire that must be updated annually. From these insights, labour in particular is coming to the fore as a key risk area, with high volumes of sub-contractors used throughout our supply chain.</p> <p>Landcom staff are employed under an award or senior management contract. Our day-to-day work is predominantly office based. Services such as planning and design, or construction, is undertaken as identified in our supply chain disclosures.</p> <p>Landcom's two office tenancies are leased in reputable commercial property owned by developers that are also reporting entities under this Act.</p> <p>Landcom has also adopted a Modern Slavery Management Plan, which guides our approach to continuous improvement in identifying, managing and remediating the impacts of modern slavery.</p>

<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.</p>					
<p>Criteria 5: Describe how the reporting entity assesses the effectiveness of such actions.</p>	<table border="1"> <thead> <tr> <th data-bbox="432 891 954 943">Where we are today</th> </tr> </thead> <tbody> <tr> <td data-bbox="432 943 954 2024"> <ul style="list-style-type: none"> • Adopted a Human Rights Statement that is publicly available on Landcom's website. • Embedded modern slavery clauses into our contracts, tailored to level of risk and supplier sophistication. • Continued as a founding consortium member for the Property Council of Australia Supplier Platform, designed to engage multitiered supply chains and assess for risks of modern slavery. • Adopted supplier pre-qualification requirements to complete the Property Council of Australia Supplier Platform modern slavery questionnaire for all new suppliers appointed to our Civil Works and Landscape panels, and all contracts over \$150,000. • Implemented a modern slavery automated notification protocol, available to staff and Landcom contractors. • Continued regular internal working group meetings to inform and recommend business approach. • Continued to deliver against our Modern Slavery Management Plan (adopted in FY20) to guide action, including identification, management and remediation approach. • Launched modern slavery training to all Landcom staff. </td> </tr> </tbody> </table>	Where we are today	<ul style="list-style-type: none"> • Adopted a Human Rights Statement that is publicly available on Landcom's website. • Embedded modern slavery clauses into our contracts, tailored to level of risk and supplier sophistication. • Continued as a founding consortium member for the Property Council of Australia Supplier Platform, designed to engage multitiered supply chains and assess for risks of modern slavery. • Adopted supplier pre-qualification requirements to complete the Property Council of Australia Supplier Platform modern slavery questionnaire for all new suppliers appointed to our Civil Works and Landscape panels, and all contracts over \$150,000. • Implemented a modern slavery automated notification protocol, available to staff and Landcom contractors. • Continued regular internal working group meetings to inform and recommend business approach. • Continued to deliver against our Modern Slavery Management Plan (adopted in FY20) to guide action, including identification, management and remediation approach. • Launched modern slavery training to all Landcom staff. 	<table border="1"> <thead> <tr> <th data-bbox="954 891 1474 943">Assessing effectiveness</th> </tr> </thead> <tbody> <tr> <td data-bbox="954 943 1474 2024"> <ul style="list-style-type: none"> • Engaged independent expert to continue providing guidance for continuous improvement. • Modern Slavery Management Plan scheduled for review on internal audit plan. • Reviewed disclosures made by Landcom suppliers engaged via the Supplier Platform and validated inherent risk to modern slavery compared to Human Rights Saliency Assessment. • Monitored the rate of response to supply chain engagement via the Supplier Platform (refer to Human Rights Performance Results). </td> </tr> </tbody> </table>	Assessing effectiveness	<ul style="list-style-type: none"> • Engaged independent expert to continue providing guidance for continuous improvement. • Modern Slavery Management Plan scheduled for review on internal audit plan. • Reviewed disclosures made by Landcom suppliers engaged via the Supplier Platform and validated inherent risk to modern slavery compared to Human Rights Saliency Assessment. • Monitored the rate of response to supply chain engagement via the Supplier Platform (refer to Human Rights Performance Results).
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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>Future priorities</p> <ul style="list-style-type: none"> • Continue to deliver on our Modern Slavery Management Plan. • Build on our notification protocols to reach a broader audience of sub-contractors, and develop an appropriate remediation approach. • Continue engagement with tier one high risk suppliers to understand their level of modern slavery risk and management maturity collaborate with tier one suppliers to increase transparency of their own supply chains (Landcom’s tier 2 and beyond supply chain). • Progressively expand our engagement and collaboration to medium and low risk suppliers. • 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). <hr/> <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 FY21 Sustainability Report at Accountable & Collaborative Places Overview, and APPENDIX F: GRI Content Index, disclosures 408 - 412 and UN Global Compact Principles 1-5.</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 addressing Human Rights and Modern Slavery has been part of our Sustainable Places Strategy since 2017.</p> <p>Throughout FY21 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 FY21 Sustainability Report.</p> <p>Landcom’s contribution to the Sustainable Development Goals, including those related to Human Rights, is presented within our FY21 Sustainability Report at APPENDIX D: Sustainable Development Goals Alignment.</p> <p>Landcom’s United Nations Global Compact ‘Communication on Progress’ disclosures are presented within our FY21 Sustainability Report at APPENDIX F: GRI Content Index.</p>