

2023 Modern Slavery Statement



Landcom's public Human Rights Statement affirms our commitment to human rights and acting to ensure our operations uphold and protect the rights of every person in our value chain. Our approach to Human Rights is informed by international best practice initiatives, including the United Nations Guiding Principles, United Nations Global Compact to which Landcom is a signatory, and the Modern Slavery Act 2018 (Cth), Guidance for Reporting Entities.

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 16 October 2023.

Landcom chooses to include its statement as a component of the annual Sustainability Report, which provides comprehensive detail 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 FY23 Sustainability Report Accountable & Collaborative Places overview.

This Statement is signed by Alex Wendler in his role as the Chief Executive Officer of Landcom on 30 October 2023.

Alexander Wendler

Criterion 1

Identify the reporting entity.

This Statement covers Landcom as the reporting entity.

Criterion 2

Describe the structure, operations and supply chains of the reporting entity.

Structure

Landcom is a NSW Government State Owned Corporation, created by the Landcom Corporation Act 2001 (NSW). 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.

Landcom annual disclosures regarding Ownership and Legal Form are presented in our FY23 Sustainability Report Appendix F: GRI Content Index, indicators 102-0.

[VIEW GRI CONTENT INDEX](#)

Landcom's operations are based in New South Wales with a main office in Parramatta and a secondary office in Sydney CBD. During FY23 Landcom active project sites located across NSW, mainly in Greater Sydney and the mid-North Coast.



For a full list refer to FY23 Sustainability Report Reporting Boundaries.

[VIEW OUR FY23 SUSTAINABILITY REPORT](#)

In FY23, Landcom had

-  **163** full time employees
-  **7** part time employees

For a detailed break-down of employees see: Information on Employees and Other Workers are presented in our FY23 Annual Report.

[VIEW OUR FY23 ANNUAL REPORT](#)

Operations

Landcom is a NSW Government property development organisation. Landcom's leadership intent is to create more affordable and sustainable communities.

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.

As a masterplan developer we use a variety of structures to deliver projects. For further information on these types of structures, and a map of our current projects refer to FY23 Sustainability Report Reporting Boundaries. Landcom does not have any formal charitable interactions.

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 regularly to the Landcom Executive Committee and Landcom Board. For further information refer to our Human Rights Performance in our FY23 Sustainability Report.

[VIEW OUR FY23 SUSTAINABILITY REPORT](#)



Supply Chains

Products provided by suppliers

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.

Services provided by suppliers

In FY23, Landcom had



645

suppliers during FY23



<1%

of these suppliers were based outside Australia.

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:

- 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.

Landcom has not yet mapped suppliers beyond tier 1 however recognise that 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.



Landcom's annual disclosures regarding Supply Chain, including our Management Approach and Performance Targets are presented in our FY23 Sustainability Report or refer to our GRI Disclosures.

[VIEW OUR FY23 SUSTAINABILITY REPORT](#)

[VIEW GRI CONTENT INDEX](#)



Criterion 3

Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity.

The property and construction industry has extensive supply chains that extend to multiple, international tiers. Our Human Rights and Modern Slavery Saliency Assessment, internal assessments of modern slavery risks, work with the Property Council of Australia (PCA) Modern Slavery Working Group and consultation with experts has identified the following areas of risk for our business:



Cleaning (operational – offices and operations)



Security



IT and telecommunications



Catering (operational – offices and operations)



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.

Landcom recognises modern slavery risks increase beyond our tier 1 suppliers. At tier 2 and beyond the transparency of operations and human rights practices become less clear. This is compounded by sub-contracting and labour hire, overseas manufacturing, or sourcing of materials and products from countries with a high risk of modern slavery.

Our tier 1 contractors report their main overseas supply chains are generally: China, India, Philippines, Thailand, Indonesia, Myanmar and Bangladesh. Landcom understands that our contractors may procure materials or products for use in our communities from these countries.

Landcom has no reason to believe that any services or products related to our operations are associated with modern slavery, however we note the risk and continue to advocate and collaborate for more transparent supply chains.

In FY23 we selected supplier assessments from high-risk industries, including civil works, construction, landscaping and facilities management. Six suppliers were reviewed for their disclosures regarding overseas products sourcing, visibility over their own supply chains, and capacity to provide effective remediation should an instance of modern slavery occur.

As a result of this review Landcom will engage with these suppliers in FY24 to provide education, collaboration and information on how to address these risks within their operations. See FY23 Sustainability Report for further details.

[VIEW OUR FY23 SUSTAINABILITY REPORT](#)

Criterion 4

Describe the key actions taken by the reporting entity to assess and address those risks, including due diligence and remediation processes.

A range of actions have already been undertaken, or are planned, as part of our commitment to continuous improvement as outlined below.

Where we are today

- Landcom has developed, approved, and made publicly available a Human Rights Statement to affirm Landcom's commitment to human rights across our operations and supply chains, acting to ensure our operations uphold and protect the rights of every person in our value chain. This statement is made publicly available here on Landcom's website.

[VIEW LANDCOM'S HUMAN RIGHTS STATEMENT](#)

- 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.
- 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 outline the risk mitigation approaches suppliers are expected to adhere to when engaging for works for Landcom. These clauses extend to supplier operations and supply chains. We also include clauses in Landcom divestment contracts, where Landcom has sold a site or portions of a site to a third party.
- 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. From this platform Landcom improved visibility of suppliers' risk factors including identifying the following insights of Landcom suppliers who completed the assessment in FY23.



42
suppliers met the threshold to complete the modern slavery risk assessment in FY23.



67%
were not reporting entities under the modern slavery legislation.



27%
used sub-contracting or third party recruitment organisations.



17%
say their organisation or their labour hire provider recruits employees or workers from overseas, such as temporary or casual migrant workers.



3%
of suppliers are unsure if their labour hire provider recruits from overseas.

- Contracts over \$150,000 require new suppliers to register as members of the Supply Chain Sustainability School and access free training and resources for modern slavery.
- Landcom requires compulsory training for these suppliers which is a learning journey on the fundamentals of modern slavery. This training must be complete within six months of the contract commencing. Training completion is monitored by the Sustainability Officer.

30
suppliers completed the modern slavery assessment via the platform in FY23.



13%
had not prepared a statement but were planning to do so in the next 12 months.



97%
say that key stakeholders in their organisation understand the basic facts around the issue of modern slavery.



17%
of suppliers source (via the supply chain) manufactured products of services from overseas that contribute to the delivery of their products or services.

Grievance Mechanisms

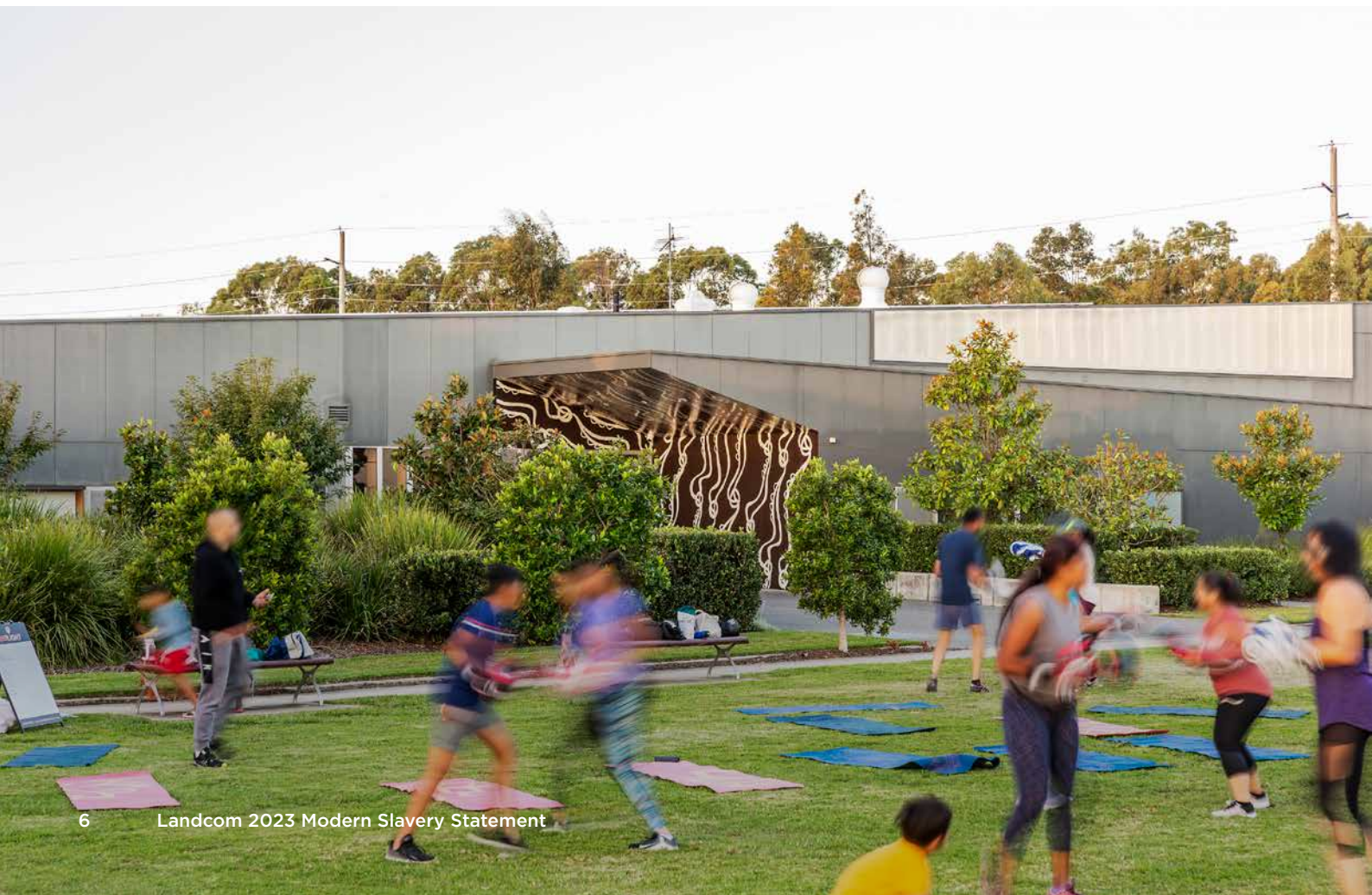
- Our new OHS reporting system, 'SafeMe' was established in FY23, ready to become effective in FY24. It can generate modern slavery notification alerts to key Landcom personnel.
- Landcom has an anonymous reporting system for internal and external stakeholders called 'SpeakUp' through third party provider, Core Integrity.
- Speak Up is promoted via posters in the Landcom office and project sites currently undergoing major construction.
- A Fraud, Corruption and Modern Slavery Notification box is located in the Landcom head office and is monitored monthly by a single member of the Legal team and reported to the Executive General Manager, Legal & Compliance.
- Our remediation plan is aligned to the United Nations Guideline Principles on Business Human Rights and follows a three step process of; Identify, Escalate, Repair and will be available on our website at the end of 2023.

Training

- Compulsory modern slavery training is completed by all staff annually.
- The NSW Anti-slavery Commissioner Dr. James Cockayne was a guest speaker to Landcom at an all staff meeting.
- Landcom's Modern Slavery Working Group received additional training and advice regarding modern slavery trends, emerging risks and remedy and remediation.

Governance

- Modern Slavery Working Group meets monthly.
- Landcom's Modern Slavery Management Plan remains active and regular updates are provided to management and the Audit & Risk Management Committee.



Criterion 5

Describe how the reporting entity assesses the effectiveness of such actions.

Assessing effectiveness

- Landcom engages two independent experts to provide guidance for continuous improvement and strategic advice on our Modern Slavery Management Plan.
- We monitor and verify supplier modern slavery assessments and adopt pre-qualification requirements for contracts over value thresholds. See Human Rights Performance Results for more detail.

[VIEW HUMAN RIGHTS PERFORMANCE RESULTS](#)

- Supplier registration and training via the Supply Chain Sustainability School is monitored monthly by the Sustainability Officer. Suppliers are invited to join the Supply Chain Sustainability School and assigned the modern slavery learning journey for completion.

Future Priorities

- Continue to deliver on our Modern Slavery Management Plan.
- Continue to be actively involved with the Property Council Modern Slavery Working Group.
- Engage with high risk suppliers to build supply chain maturity.
- Broaden the scope of suppliers required to complete the modern slavery assessment where possible.
- Monitor and mature our Modern Slavery Management Plan as needed and in accordance with any of the anticipated changes to the *Modern Slavery Act 2018 (Cth.)*.

For more information on our overall approach to human rights, see FY23 Sustainability Report at Accountable & Collaborative Places Overview.

[VIEW OUR FY23 SUSTAINABILITY REPORT](#)

Criterion 6

Describe the process of consultation with any entities the reporting entity owns or controls.

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.



Criterion 7

Include any other information that the reporting entity considers relevant.

Landcom has been actively involved with the Property Council Modern Slavery Working Group, with a Landcom representative as Co-Chair and participation in projects and initiatives which are guided by academics and industry experts.

Collectively, in FY23 this consortium has:

- Directly contributed to the released '[Listening and Responding to Modern Slavery in Property and Construction](#)',
- Directly contributed to the released '[Remediating Modern Slavery in Property and Construction: A practical guide for effective remediation](#)',
- Informed the industry consultation for the Review of the *Modern Slavery Act 2018 (Cth)*,
- Informed the [November 2022 Property Council of Australia submission to the Review of the Act](#), and
- Participated in the October 2022 consultation session with Professor John McMillan about the future of the Act and the success of industry actions in addressing modern slavery.

Landcom continues to proactively manage the risks of modern slavery within our operations and supply chain in line with the guidance provided by the United Nations Guiding Principles.

[VIEW UNITED NATIONS GUIDING PRINCIPLES](#)

We are committed members of the United Nations Global Compact Network Australia, 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.

Throughout FY23 our commitment to continuous improvement regarding modern slavery did not experience any material impacts from COVID-19.

Landcom's annual disclosures regarding Modern Slavery, including further detail on our Management Approach, supply chain engagement, and continuous improvement is presented in our FY23 Sustainability Report.

[VIEW OUR FY23 SUSTAINABILITY REPORT](#)

