



A guide to help protect human rights in our value chain

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.

As part of our approach to mitigating the risk of modern slavery in our value chain, Landcom has adopted a Modern Slavery Management Plan. This plan includes the implementation of internal and external grievance mechanisms which enable notification of modern slavery incidents to be reported and investigated, and where necessary appropriate remedy to be taken.

The plan also includes a remediation guide that will assist Landcom on the appropriate response when a report of modern slavery is made. This was informed by independent human rights experts and is aligned to the United Nations Guideline Principles on Business Human Rights.

Our approach to remediation is based on three core principles of **Identify, Escalate, Repair**.



Phase 1: Identify and Protect

Notified representatives gather evidence regarding the notification, and collectively assess the incident severity and next steps according to the Incident Escalation & Notification 'Severity of Incident' examples.

During Phase 1 a PROTECT principle will be adopted to safeguard the ongoing human rights of the complainant, or any victims the complainant may be notifying on behalf of. This is in accordance with the [United Nations Guiding Principles on Business and Human Rights](#).



Phase 2: Escalate and Act

The nominated representatives of Phase 1 will collectively triage the incident as above. Where necessary, an incident will be escalated to Landcom's human rights experts for independent and expedient recommendations on next steps for the Executive General Manager Communications & Strategy (or nominated delegate).



Phase 3: Remedy and Restore

Where required, a recommendation to the CEO will be made for appropriate remediation to victims using the [United Nations Effective Remedy, Business Related Human Rights](#) as a guide. This will include necessary legal and human rights expert advice.

Some examples are presented below:

- Landcom directs a supplier (if evidence demonstrates they are found at fault) to remediate with victims directly;
- Landcom leads remediation, and enforces contractual Modern Slavery rights with suppliers if established; or
- Any other remedy as deemed appropriate by the management.

Where egregious instances of Modern Slavery are identified in Phase 1 and 2, the appropriate reports will be made to relevant authorities under guidance from Landcom's human rights experts (per Phase 2), and legal advice will be obtained in collaboration with the EGM Legal & Compliance (or nominated delegate). Landcom's Executive Committee will be notified.



Phase 4: Learn and Prevent

As part of Landcom's Modern Slavery Management Plan our processes and approaches are regularly reviewed and updated to ensure compliance and the risk of harm to people is prevented.

After the notification of any modern slavery incident, the matter will be reviewed by those notified in Phase 1, and any adjustments to Landcom's approach will be made, with endorsement from the Executive Committee and/or CEO approval where required.

To view Landcom's FY23 Modern Slavery Statement, visit our website here:

<https://sustainabilityreport2023.landcom.com.au/appendices/modern-slavery-statement/>