

Appendix K GRS Annual Reporting Template

Introductory Remarks

Our public [human rights statement](#) affirms our commitment to respecting human rights and acting to ensure our operations uphold and protect the human rights of every person in our value chain. This commitment is a fundamental pillar to our leadership intent to create more affordable and sustainable communities.

Our [approach](#) is informed by international best practice initiatives, including the United Nations Guiding Principles on Business and Human Rights. We are committed participants 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.

As a NSW state-owned corporation with dual reporting obligations under the *Modern Slavery Act 2018* (Cth) and the *Modern Slavery Act 2018* (NSW), our approach continues to be informed by guidance published by Australian state and federal entities.

The *Modern Slavery Act 2018* (Cth) requires entities with an annual consolidated revenue of \$100 million or more based or operating in Australia to prepare annual statements on modern slavery risks in their operations and supply chains and disclose the steps taken to address those risks.

The *Modern Slavery Act 2018* (NSW) requires eligible entities (which includes state-owned corporations in their capacity as government-sector finance agencies) to provide a statement in their annual report that details the steps taken during the financial year to ensure that any goods or services procured by the entity were not the product of modern slavery. Under section 31(1)(a) of the *Modern Slavery Act 2018* (NSW), Landcom must also report on any significant operational issue raised by the Anti-slavery Commissioner.

Accordingly, the following information is disclosed in accordance with the *Modern Slavery Act 2018* (NSW) and the Guidance on Reasonable Steps (GRS), issued by Office of the NSW Anti-slavery Commissioner (OASC) that came into force on 1 January 2024.

For further information on Landcom's approach to human rights, including our modern slavery statements, click [here](#).

Part A. General information

A.1 Reporting Entity Details

Reporting Entity Details	
Reporting entity	Landcom

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Reporting period – start date	1 July 2024
Reporting period – end date	30 June 2025
Name of individual authorising this report	Alex Wendler
Position of individual authorising this report	CEO
Contact details	
• Contact phone	(02) 9841 8600
• Contact email	info@landcom.nsw.gov.au
• Confirm contact email	info@landcom.nsw.gov.au
Organisational (shared) email	info@landcom.nsw.gov.au

A.2 Procurement Spend Details

A.2.1 Landcom’s total procurement spend for the reporting period was \$133,322,364

A.2.2 Procurement Spend by GRS Due Diligence Level

Procurement Spend by GRS Due Diligence Level	Due Diligence Level	Spend
	Heightened	\$86,141,303
	Standard	\$1,811,020
	Light	\$45,370,041

GRS Inherent Modern Slavery Risk Level	Categories (Level 3)
Heightened	<ul style="list-style-type: none"> • Couriers • End User Devices • FM Maintenance Contract • Food Catering and Consumables • Health and Safety Advisory and Compliance • ICT Market Research, Benchmarking • Landscaping and Arborists • Operational Telco and Radio • Other Building Materials • Presentation and Multi-Media

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- Printers, Scanners, Multifunction Equipment
- Residential building works
- Safety Workwear
- Security Services
- Software as a Service - SAAS, licensing and maintenance

Standard

- Couriers
- Flooring and Carpeting
- FM Maintenance Contract
- Interior Fitout and Refurbishment
- Network Hardware purchases and inventory
- Software as a Service - SAAS, licensing and maintenance
- Stationery

Light

- Advertising
 - Agency Partnerships
 - Archaeology and Heritage
 - Architecture
 - Business Processes
 - Conferences, Seminars, Events and Special Meetings
 - Couriers
 - Employee Professional Memberships
 - End User Devices
 - Environmental Advisory, Sustainability and Resilience
 - FM Maintenance Contract
 - Geotechnical Engineering and Hydrology
 - Government Agencies
 - Health and Safety Advisory and Compliance
 - ICT Procurement Process Service
 - ICT Strategy, Planning and Design
 - Landscape Architecture
 - Landscaping and Arborists
 - Legal Support Services
 - Marketing and Campaign Management
 - News, Magazine, Library Subscriptions
 - Other Construction Equipment Hire
 - Parking
 - Project Management and Project Evaluation
 - Property Acquisition and Valuation
 - Public Transport (Bus, Rail, Ferry)
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- Software as a Service - SAAS, licensing and maintenance
 - Stationery
 - Structural Engineering
 - Talent Search
 - Taxis and Rideshare
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Part B. Annual modern slavery reporting

B.1 Significant operational issues

Landcom is not aware of any significant operational issue identified by the NSW Anti-Slavery Commissioner during the reporting period.

B.2 Reasonable Steps

During FY25, Landcom took the following steps to ensure that the goods and services we procured were not the product of modern slavery.

REASONABLE STEP 1: COMMIT

1.1 Stakeholder Engagement

Landcom continued to engage with internal and external stakeholders throughout the reporting period.

Specifically, we:

- Continued to engage our employees through the deployment of our internal modern slavery training module.
- Commenced the development of an internal stakeholder engagement plan to increase communication to staff, including email communications and newsletters, as well as scheduling an expert panel discussion on modern slavery with representatives from the Red Cross, The Freedom Hub and Better Sydney in FY26.
- Continued to share information and learnings from various industry groups, forums and events with members of Landcom's Modern Slavery Working Group (the Working Group) to shape our overall modern slavery approach and keep abreast of key modern slavery issues.
- Continued to engage with our industry peers through our membership of and participation in the Property Council of Australia (PCA)'s Human Rights and Modern Slavery Working Group and Inform365 Consortium.
- Engaged employees from our legal, procurement and sustainability functions as part of a set of targeted interviews to inform the development of a three-year modern slavery roadmap.
- Continued to engage with our suppliers, including:

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- Via our modern slavery supplier assessment questionnaires (SAQs).
- Discussions with our head office building management provider in a deep-dive workshop focusing on identifying and understanding the modern slavery risks in their operations and the steps they take to identify and mitigate those risks. Quarterly collaboration meetings have now been scheduled.
- Continued formal engagement with several Tier 1 contractors, including a deep-dive supply chain risk workshop with a high-risk security and cleaning supplier.
- Continued to engage with The Freedom Hub (TFH) and their Survivor Advisory Board (SAB) to better listen to, understand and incorporate lived experience into our programs and processes. Representatives from TFH's SAB reviewed our remediation plan and supplier training and provided targeted recommendations for improvement.

1.2 Identifying Modern Slavery Risks

During the reporting period, we:

- Continued to supplement and review the relevance of salient modern slavery risks (as identified in our Human Rights Salience assessment conducted in FY19) with a combination of supplier assessment questionnaires, knowledge-sharing through our membership of the PCA Human Rights and Modern Slavery Working Group and consultation with experts.
- Further embedded modern slavery risk assessment into our procurement processes by formally updating and aligning our procurement activity categories with those as listed in Office of NSW Anti-Slavery Commissioner's Inherent Risk Identification Tool (IRIT).
- Conducted a high-level independent review of our salience assessment for currency. This review confirmed that the salient modern slavery risks identified in FY19 remain current, with some new potential risks arising from material business changes such as Landcom's electrification mandate and the introduction of Landcom's Project Management Office (PMO) for construction and Built Form.
- Continued to be guided by the United Nations Guiding Principles on Business and Human Rights continuum of involvement in our approach to risk identification, as reflected in our risk registers.

Updated our Strategic Risk Register noting new potential operational Health, Safety and Environment risks to people throughout the lifecycle of our projects as a result of the addition of the PMO for construction and Built Form.

1.3 & 1.4 Key Modern Slavery Policies and Plans

During the reporting period, we:

- Conducted a thorough review of and updated our modern slavery management plan (MSRP) in line with international and domestic best practice guidance to enhance our approach to identifying, managing and remediating the impacts of modern slavery. The updated MSRMP was developed to include specific metrics, aligned to the Property Council of Australia's publication "["Impact Metrics for Addressing Modern Slavery in Property and Construction"](#)" and outlines clear, actionable targets and indicators and results-oriented KPIs to measure the success of modern slavery risk management.

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- Continued to report our progress against our MSRMP regularly to the Landcom Executive Committee, Board and Audit and Risk Management Committee (ARMC).
- Engaged an external consultant to assist in developing a three year roadmap to support the maturation of our approach through an informed, fit-for-purpose and effective modern slavery program. Informed by stakeholder feedback, maturity analyses and best practice research, the roadmap aims mature our approach to modern slavery with the ultimate aim of improving people's lives by:
 - embedding due diligence
 - reflecting best practice (including lived experience)
 - supporting Landcom's strategic intent; and
 - building capability and accountability.
- Structured across four focus areas of Governance, Supply Chain and Due Diligence, Grievance and Remediation and Collaboration, the roadmap includes short, medium and long-term actions across a three-year period. In FY26, we will implement the roadmap via Landcom's modern slavery working group and use it to guide our actions and key projects.
- Reviewed and updated our Human Rights Statement to include a modern slavery addendum, in line with international standards, industry best practice and guidance from the Office of the NSW Anti-Slavery Commissioner. We intend to publish the updated statement in FY26.

REASONABLE STEP 2: PLAN

2.1 Identifying and Mapping Modern Slavery Risks

During the reporting period, we:

- Continued to identify modern slavery risks specific to Landcom by supplementing the identified modern slavery risks from our FY19 human rights salience assessment with a combination of inherent risk assessment processes (by assessing our procurement spend for inherent modern slavery risks using the Inherent Risk Identification Tool (IRIT) from the Office of the NSW Anti-Slavery Commissioner), reviewing our supplier responses through our supplier assessment questionnaires, knowledge-sharing through our membership of the Property Council of Australia (PCA) Human Rights and Modern Slavery Working Group and consultation with industry experts.
- Our FY25 IRIT assessment identified that 90% of Landcom suppliers fall into the minor inherent risk category, however, the highest inherent risk categories of construction materials, facilities and building management, and civil construction also correlate to the highest spend. This process allowed us to identify the suppliers that represent the highest inherent risk and engage in targeted engagement with these suppliers to better understand their modern slavery management approaches and actions to identify residual risk
- Conducted a high-level independent review of our salience assessment for currency. As part of this process, we reviewed and mapped our value chain, including potential adverse human rights risks to identify potential or actual risks, as well as relevant rightsholders affected. This process indicated that the salient risks identified in FY19 remain current, with some new risk indicators arising from material business changes such as Landcom's

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electrification mandate and the introduction of Landcom's Built Form division (PMO) in FY25.

- Extended the scope of our assessment and mapping of risks by engaging with the developer who owns and manages our head office to better understand their approach to identifying and mitigating modern slavery risks within their operations and supply chain. Key examples include helping to improve the payroll systems and processes of their subcontractors to mitigate the risk of wage theft. We continue to have valuable, quarterly discussions with their social sustainability team.
- Made FY26 commitments in our FY25 modern slavery statement to:
 - Incorporate the updated salient modern slavery issues into our policies and procedures;
 - Conduct an annual high-level currency review of salient modern issues to supplement a more thorough salience assessment every 2-3 years;
 - Review and update our risk assessment processes

2.2 Develop a risk-reducing sourcing strategy

During the reporting period, we:

- Included a commitment to formalise a responsible sourcing strategy, alongside other key due diligence mechanisms, as part of our three-year roadmap.
- Commenced the rollout of a centralised supplier platform which will allow us a centralised view of our supplier base, to inform the strategy.
- Continued to engage with suppliers in high-risk categories (i.e. facilities) to understand their modern slavery risk exposure and key controls in place.
- Embedded the use of alternative and repurposed materials (e.g. felled trees) at our Panorama Project in North Wilton, reducing the need for imported, high-risk construction materials such as timber.

REASONABLE STEP 3: SOURCE

3.1 Select appropriate suppliers

During the reporting period, we:

- Continued to require all Landcom suppliers to complete our Supplier Code of Conduct. The Code sets out our expectations that everyone who works for or on behalf of Landcom demonstrates the highest standards of conduct and ethics in the performance of their duties. It also sets the expectation that we may ask suppliers to complete the Modern Slavery Supplier Assessment Questionnaire (SAQ) as part of their contractual obligations.
- Maintained our requirement for all suppliers with contract spend of \$150,000 AUD (inclusive of GST) or more and all suppliers responding to a tender to complete the modern slavery SAQ (deployed through the PCA's Supplier Platform). This requirement is embedded into our existing procurement processes, and suppliers are required to update their responses annually for currency. This integrated process results in consistently high supplier response rates year on year, allowing greater visibility of our supplier risk characteristics and profiles.

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- Deployed a control mechanism where suppliers are required to complete the SAQ in circumstances where a contract variation pushes contract values above the current threshold of \$150,000 AUD.
- Identified some select responses to select SAQ responses that require further interrogation in FY26 (e.g. whether suppliers source manufactured products or services from overseas).

3.2 Adopt a shared responsibility approach to contracting

During the reporting period, we:

- Continued to include modern slavery clauses, tailored to the level of risk and supplier sophistication in all Landcom contracts. 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 in 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.

To support our commitment to continuous improvement, we intended to review our contract clauses in line with best practice guidance in FY25. Due to the implementation of a new contracting system, we deferred this commitment to FY26.

REASONABLE STEP 4: MANAGE

4.1 Monitor and Evaluate Supplier Performance

During the reporting period, we:

- Monitored any material breaches or terminations related to modern slavery clauses which are to be reported to relevant stakeholders in accordance with Landcom's Modern Slavery Risk Management Plan. No such breaches or terminations were reported during the reporting period.
- Monitored our confidential grievance mechanism 'Speak Up' (as previously deployed in FY23) and continued to deploy and monitor confidential reporting forms and boxes for contractors onsite.
- Continued to monitor SAQ responses for key performance indicators such as policy commitments to modern slavery.
- Held a deep-dive supply chain risk workshop with a security and cleaning supplier categorised as high-risk, allowing us to understand how the supplier mitigates the risks within their supply chain, the actions are taking or plan to take to support their sub-contractors. This exercise has strengthened our understanding of their operations and supply chain across 28 Landcom project sites.
- Landcom did not require any Tier 1 suppliers to undergo an audit addressing modern slavery risks in this reporting period.

4.2 Develop Supplier Capabilities

During the reporting period, we:

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- Continued to deploy our new, in-house modern slavery training module for our Tier 1 suppliers to ensure that modern slavery training was bespoke to their respective roles and responsibilities, and that monitoring of response rates could be completed in-house. The training includes information on Landcom's grievance mechanisms, and a step-by-step guide on how to report incidents or suspected incidents of modern slavery via our Occupational Health and Safety incident reporting system, 'SafeMe' (established in FY23).
- The module was delivered to all existing Tier 1 suppliers in the second half of FY25 and included a new ongoing requirement for all new suppliers to complete the training as part of our prequalification process.
- Made the following commitments for FY26 in our FY25 modern slavery statement:
 - Continue to encourage our Tier 1 suppliers to roll the supplier training out to their sub-contractors to continue to build supply chain maturity
 - Offer support for modern slavery statement development for suppliers who identified their intention to complete a statement in FY26
 - Offer educational support for suppliers that are not required to report under the Act
 - Offer training and educational resources to those suppliers who do not currently provide training to employees or suppliers and to suppliers that do not have a grievance mechanism
 - Review our SAQ processes and response and engagement gaps with our suppliers on issues such as recruitment of overseas workers and sourcing of materials from overseas.

REASONABLE STEP 5: REMEDY

5.1 Provide or enable access to effective modern slavery grievance mechanisms

During the reporting period, we:

- Maintained our Occupational Health and Safety (OHS) incident reporting system 'SafeMe' which notifies key Landcom personnel of any incidences of modern slavery. The system includes the ability to generate modern slavery notification alerts to key Landcom personnel.
- Maintained our modern slavery reporting protocols that support 'SafeMe' in Landcom's Incident Response Plan.
- Maintained our confidential grievance mechanism 'Speak Up' and continued to deploy and monitor this and our confidential reporting forms and boxes for our staff at our head office location and for contractors working on our project sites.
- Expanded the display of posters communicating how to access 'Speak Up' at all sites to ensure they were visible and accessible to workers.
- Began discussions on embedding education of the 'Speak Up' platform into site inductions for contractors in FY26.

5.2 Take safe and immediate steps to remedy harm

During the reporting period, we:

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- Continued to provide public access to our [remediation plan](#) (as endorsed by Landcom’s CEO in June 2023) on our corporate website. The remediation plan is informed by the United Nations Guideline Principles on Business Human Rights, including the core principles of “Identify, Escalate and Repair” and the adoption of the “protect” principal during Phase 1 to safeguard the rights of the complainant. There were no reported harms to which Landcom was connected during the reporting period.
- Engaged TFH’s SAB who reviewed our remediation plan and provide targeted recommendations for improvement.
- Committed to participating in a targeted workshop led by TFH to run
- hypothetical scenarios to test the response mechanisms and protocols within our Remediation Plan and to integrating the findings into our Remediation Plan in FY26 in our FY25 modern slavery statement.

5.3 Use leverage to remediate deficient practices

During the reporting period, we:

- Committed to offering training and educational resources to those suppliers who indicated they do not have a grievance mechanism in their SAQ. (See our FY25 modern slavery statement).

There were no reported or suspected instances of deficient modern slavery practices during the reporting period.

5.4 Withdraw responsibly

Whilst we were not required to withdraw responsibly in connection to any instances or grievances raised in relation to modern slavery during the reporting period, as part of a strategic review of our modern slavery contract and tender clauses and responsible sourcing approach in FY26, responsible withdrawal will be reviewed in line with the GRS guidance.

REASONABLE STEP 6: REPORT

6.1 Establish a victim-centred reporting protocol

During the reporting period, we:

- Continued to make our [remediation plan](#) (as endorsed by Landcom’s CEO in June 2023) available on our corporate website that prioritises the interests of the victim/survivor. See response at 5.2 for further information.

Engaged TFH’s SAB who completed a review of our reporting processes. See responses 1.1 and 5.2 for further detail.

6.2 Report on your modern slavery risk management efforts

During the reporting period, we:

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- Made disclosures in accordance with the *Modern Slavery Act NSW* (2018) and the Office of the NSW Anti-Slavery Commissioner's Guidance on Reasonable Steps (GRS) in Landcom's annual report for the financial year ending 2024-2025. As required by the legislation, Landcom intends to provide the same information to the OASC through the online annual report form (formerly Appendix K). At the time of writing Landcom intends to submit this form once Landcom's annual report for the financial year ending 30 June 2025 is tabled in Parliament.
- Landcom did not report heightened modern slavery due diligence (HMSDD) procurements valued at \$150,000 (inc. GST) or more within 45 days in light of the NSW Anti-Slavery Commissioner's announcement that the HMSDD requirement would be delayed until further notice.

Disclosures on Landcom's modern slavery risk management efforts during the reporting period can also be found in Landcom's FY25 modern slavery statement.

REASONABLE STEP 7: IMPROVE

7.1 Lessons Learned

During the reporting period, we:

- Continued our membership of the PCA's Human Rights and Modern Slavery Working Group which focuses on broad, strategic human rights issues and collaborative projects within the property industry, and were actively involved in the following projects:
 - The launch of ['Impact Metrics for Addressing Modern Slavery in Property and Construction: A guide to understanding and measuring impacts'](#) guide on International Day Against Child Labour. Developed by the PCA in partnership with Edge Impact and the Australian Red Cross, the guide enables organisations to quantify and evaluate their human rights and modern slavery outcomes across four key impact areas of Governance, Supply Chain, Grievance and Remediation and Collaboration. The guide includes actionable targets and indicators of success to help businesses understand the performance of their actions in managing modern slavery risks and is informed by lived experience.
 - Keynote addresses from 12 guest speakers and subject matter experts including:
 - Sally Irwin, CEO and Founder at The Freedom Hub;
 - Dr Miriam Thompson, CEO of the Cleaning Accountability Framework (CAF);
 - Dr James Cockayne, NSW Anti-slavery Commissioner; and
 - Chris Evans, the Australian Anti-Slavery Commissioner.
- Collaborated to inform submissions on key human rights and modern slavery issues and legislation, including a submission to the Australian Anti-Slavery Commissioner's Consultation on development of a [Strategic Plan for the Office 2025-2028](#).
- Collaborated with another State-Owned Corporation to gain insights into how they are approaching mitigating and reporting on the risks of Modern Slavery in their supply chain and operations. We intend to continue this collaboration in FY26.
- Worked with an external consultant to:

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- Develop a three-year modern slavery roadmap to support the delivery of an informed, fit-for purpose and effective modern slavery program.
- Embed specific metrics into our MSRMP, aligned to the aforementioned PCA Impacts Metrics Guide. The updated MSRMP outlines clear, actionable targets and indicators to measure the success of modern slavery risk management and results-oriented KPIs.
- Review and improve our human rights statement, including developing a specific modern slavery addendum in line with best practice guidance.
- Committed to reviewing the effectiveness of our actions in line with best practice guidance, including to amending our risk assessment and prequalification requirements as needed, in consultation with Landcom's Modern Slavery Working Group members and subject matter experts to ensure they are relevant and appropriate.

7.2 Train your workforce

During the reporting period, we:

- Continued to deliver internal modern slavery training to all new staff with a completion rate of 74%.
- Introduced the requirement for staff re-training every 2 years.
- Commenced work to update our modern slavery training content in partnership with TFH's SAB to assist with embedding lived experience into its design and delivery.
- Committed to reviewing and incorporating the TFH SAB's feedback into the updated modules for rollout to our staff.
- Identified the need to increase awareness of and engagement with modern slavery amongst our staff and other stakeholders and commenced development of an internal Engagement Plan (see section 1.1).

7.3 Cooperate with the Anti-Slavery Commissioner

During the reporting period, we:

- Met remotely with the NSW Anti-Slavery Commissioner and members of his Office on 12 February 2025 to discuss and clarify Landcom's dual regulatory obligations under both the *Modern Slavery Act 2018* (Cth) and the *Modern Slavery Act 2018* (NSW)
- Continued to liaise with the Office of the NSW Anti-Slavery Commissioner to clarify our understanding of our regulatory obligations, as well as providing feedback on guidance material as discussed in our meeting on 12 February 2025.