

# MODERN SLAVERY STATEMENT

FY25



**LANDCOM**

# Modern Slavery Statement

## Acknowledgement of Country

In the spirit of Reconciliation, Landcom respectfully acknowledges the Traditional Custodians of Country throughout NSW and recognises and respects their continuing cultural heritage, beliefs and connection to land, sea and community. We pay our respects to their Elders past and present. This land always was and always will be traditional Aboriginal land.

## Speak up

Landcom is committed to a culture that encourages people to speak up about issues or conduct that concern them, including modern slavery or human rights concerns. You can make a report using our confidential and independently managed “Speak Up” Hotline.

Visit <https://landcom.com.au/contact-us/speaking-up> for further details about how to make a report.

## Index to mandatory criteria

This Statement and its disclosures are published in accordance with the mandatory reporting criteria as set out in section 16(a) – (g), *Modern Slavery Act 2018* (Cth). See below to locate each criterion within the Statement.

Section	Mandatory Criteria	Reference
Section 16(a)	Identify the reporting entity	<a href="#">p.7</a>
Section 16(b)	Describe the structure, operations and supply chains of the reporting entity	<a href="#">p.8</a>
Section 16 (c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	<a href="#">p.10</a>
Section 16 (d)	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	<a href="#">p.11</a>
Section 16 (e)	Describe how the reporting entity assesses the effectiveness of such actions	<a href="#">p.17</a>
Section 16 (f)(i) – (ii)	Describe the process of consultation with: <ul style="list-style-type: none"><li>• any entities that the reporting entity owns or controls; and</li><li>• in the case of a reporting entity covered by a statement under section 14--the entity giving the statement; and</li></ul>	NOTE: Landcom is not required to respond to this criterion as it does not own or control any other entities
Section 16 (g)	Include any other information that the reporting entity, or the entity giving the statement, considers relevant	<a href="#">p.12</a>

## About this statement

This is Landcom's sixth Modern Slavery Statement, published in accordance with the *Modern Slavery Act 2018* (Cth) (the Act) for the financial year 2024-2025. As a New South Wales state-owned corporation with no controlled entities, this statement covers Landcom as the reporting entity.

This Statement provides an overview of Landcom's approach to modern slavery, which includes our responses to the Mandatory Criteria as outlined in Section 16 of the Act. Landcom chooses to include its statement as an important component of its annual Sustainability Report, which provides comprehensive detail on our approach to Human Rights.

This Statement was approved by the Landcom Board, in its capacity as the principal governing body of Landcom, on 26 September 2025, and was signed by Alex Wendler in his role as the Chief Executive Officer of Landcom on 14 October 2025 in accordance with section 13(2)(c)-(d) of the Act.

ERM CVS has provided independent third-party limited assurance over this FY25 Modern Slavery Statement.

For further detail on Landcom's approach to Modern Slavery, including our Management Approach, supply chain engagement, and continuous improvement and the Assurance Report, see our annual disclosures as presented in our FY25 Sustainability Report.


## CEO message

The financial year 2024-2025 marked our sixth year of reporting since the introduction of the *Modern Slavery Act 2018* (Cth), our seventh year of progressing our Sustainable Places Strategy, and an important strategic juncture in our modern slavery journey.

A key pillar of our Sustainable Places Strategy is delivering Accountable & Collaborative Places. This pillar reflects our commitment to robust governance and collaboration within our organisation and supply chain.

During FY25, we were proud to have developed a three-year roadmap to mature and inform our modern slavery approach and key governance documents. We continued to educate our staff and engaged people with lived experience to review and improve our policies and procedures. We are also committed to continuing our engagement with our supplier-base to understand and address modern slavery risks.

We will continue to work with our industry peers and external stakeholders to incorporate an understanding of modern slavery into our risk assessment and due diligence processes and measure the effectiveness of our actions. We believe the actions we have taken this financial year will provide a strong foundation from which we can continue to learn and improve on our important strategic focus areas.



**Alex Wendler**  
Chief Executive Officer, Landcom

14 October 2025

# Our Progress

## Laying the foundations

## Developing key processes

## Engaging our stakeholders

## Addressing grievances and remediation



### FY20

- Completed our initial Human Rights Salience Assessment
- Established our Modern Slavery Working Group
- Adopted our Modern Slavery Management Plan
- Became a founding consortium member of the Property Council of Australia's Modern Slavery Working Group and Supplier Platform
- First engaged our suppliers through the Supplier Platform.
- Published our first Modern Slavery Statement in accordance with the *Modern Slavery Act 2018* (Cth)

### FY21

- Adopted our publicly accessible Human Rights Statement
- Embedded modern slavery clauses into our contracts
- Adopted supplier pre-qualification requirements
- Implemented a modern slavery automated notification protocol for staff and contractors
- Launched modern slavery training for all Landcom staff

### FY22

- Refined our modern slavery contract clauses to include supplier operations and supply chains
- Collated insights from the Property Council of Australia (PCA) supplier platform regarding supplier risk
- Participated in our first PCA review of member modern slavery statements
- Directly linked our supplier pre-qualification and procurement processes
- Updated our staff modern slavery training
- Adopted a Grievance mechanism
- Introduced supplier training, deployed by the Supply Chain Sustainability School

### FY23

- Further refined our modern slavery contract clauses for divestment contracts
- Introduced OHS incident reporting system, 'SafeMe'
- Introduced anonymous reporting system for internal and external stakeholders called 'SpeakUp'
- Developed and made public our Remediation Plan
- Hosted the NSW Anti-Slavery Commissioner Dr James Cockayne to address all staff
- Deployed additional modern slavery training to our Modern Slavery Working Group

## Review, reflect and improve



### FY24

- Developed new, targeted in-house modern slavery training for our Tier 1 suppliers
- Conducted a detailed review and maturity assessment of our progress against our modern slavery commitments
- Developed an operational framework to support the ongoing implementation of our modern slavery initiatives
- Commenced formal discussions with representatives of people with lived experience to deliver targeted reviews of our key documents and policies in FY25
- Delivered targeted modern slavery training to Landcom's executive committee and CEO, delivered by modern slavery experts from the Australian Human Rights Institute and Better Sydney
- Received a 90% completion rate for our supplier modern slavery assessment questionnaires

### How did we go in FY25

- Developed a modern slavery roadmap to guide our approach, informed by our dual obligations under the *Modern Slavery Act 2018* (Cth) and the *Modern Slavery Act 2018* (NSW)
- Reviewed our human rights salience assessment for currency
- Reviewed and matured our Human Rights Statement for publication in FY26
- Respectfully and appropriately engaged people with lived experience and their representatives to mature our key modern slavery programs, policies and procedures
- Delivered a deep dive workshop with a Tier 1 supplier to gain deeper visibility of our Tier 2 supply chain
- Created an operational plan to support the progress and maturation of our Modern Slavery Management Plan

# Our Commitment

Our [public human rights statement](#) affirms our commitment to act and 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 and our commitment to the United Nations Sustainable Development Goals. We are committed members of the Property Council of Australia's Human Rights and Modern Slavery Working Group and continue to work with industry peers in addressing collective industry-specific modern slavery issues. 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 also be informed by Australian state and federal legislative guidance.

We understand that prioritising risks to people, focusing our efforts on the most salient modern slavery risks and taking a collaborative and shared approach to responsibility are fundamental steps to ensuring we continuously improve our response to this complex and challenging issue. We are committed to developing and maturing our due diligence approach to prevent, identify, mitigate, address and account for negative impacts of modern slavery in our operations and supply chain.

## Our FY26 commitments

1. Embed lived experience into key training and remediation programs
2. Review and update Landcom's risk assessment and due diligence processes
3. Develop a stakeholder engagement plan for staff, supplier and industry engagement
4. Complete incident based scenario testing to assess effectiveness of our processes
5. Conduct review of Landcom's modern slavery clauses in line with best practice guidance



## Who we are & what we do

Landcom is a New South Wales (NSW) Government State-Owned Corporation created by the *Landcom Corporation Act 2001* (NSW). Landcom sits within the NSW Department of Planning, Housing and Infrastructure. Landcom is not part of a larger corporate group of entities and does not control or own any other entities.

Landcom's operations are based in NSW with a main office in Parramatta and a secondary office in Sydney CBD. For further detail on Landcom's Ownership and Legal Form, see our FY25 Sustainability Report - Appendix C - GRI Content Index.

We are a commercial business that develops land to achieve public outcomes and financial benefits for the NSW Government and the people of NSW. Our way of doing business is underpinned by our legislated principal objectives, functions and ministerial priorities, which includes (amongst others) being a successful and responsible developer that exhibits a sense of social responsibility and protects the environment.

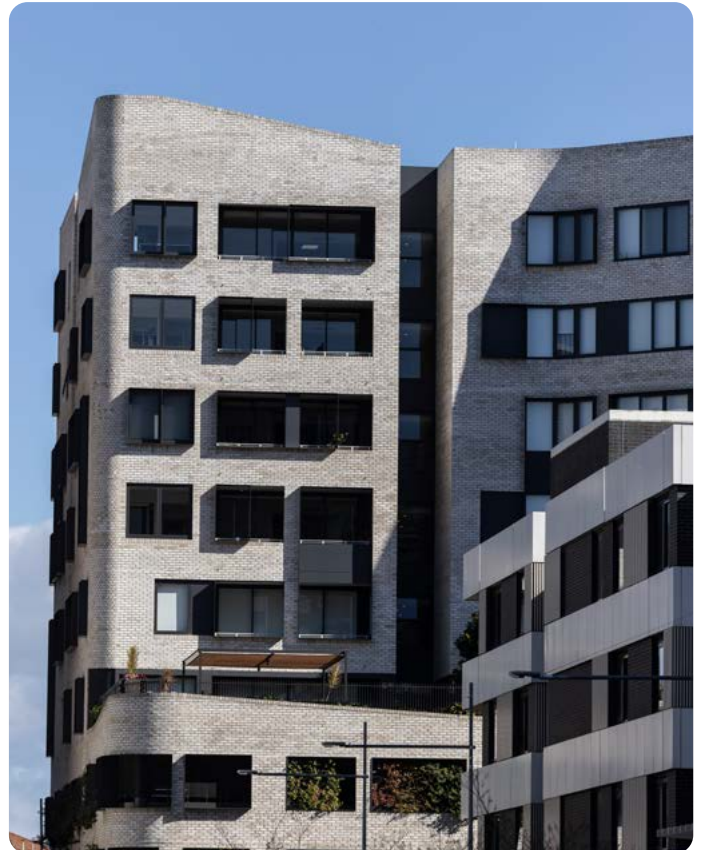
Our leadership intent is to create more affordable and sustainable communities. We supply home sites through the delivery of sustainable master planned communities and development projects, with a focus on expanding the stock of affordable and diverse housing. We enable development by de-risking and unlocking strategic and complex sites in collaboration with landowners and the market.

We act as a master developer, developer or builder and also partner with NSW Government departments and external commercial entities to maximise housing delivery and impact. During FY25, Landcom had 20 active project sites located across NSW. Landcom uses a variety of structures to deliver projects, from managing all aspects of master planning, approvals and development works for vacant sale (either on our own or through Project Delivery Agreements with project partners), to Reverse Project Delivery Agreements where we develop land on behalf of other government agencies or the private sector.

These different project delivery structures mean

Landcom has varying degrees of influence over project dynamics and outcomes. As a result, our leverage and control over effective modern slavery risk management must be dynamic and recognise these characteristics of our organisation.

In FY25, we re-entered direct property development with the launch of our Project Management Office (PMO). This significant change enhances our control and visibility over procurement, contractor management and on-site practices, increasing our ability to identify, mitigate and remediate modern slavery risks. We recognise that with greater operational involvement comes strengthened leverage and control to ensure labour rights are protected throughout the development lifecycle. This includes reinforcing due diligence, embedding stronger ethical standards in contracts, and deepening engagement with suppliers and workers across our projects.



## Our people

Our workforce is largely categorised by those who work in enabling corporate and support services such as business services, legal, financial, communications and sustainability, and those who work directly on our development projects in our PMO, master planning development, built form and asset management teams.

As at 30 June 2025, Landcom's workforce was comprised of 199 employees, the majority of who were employed as permanent staff (186) with the remainder on fixed term contracts. All our employees were located at either our head or secondary office locations or project sites throughout NSW. Further detail with respect to Landcom's workforce composition can be found in our Annual Report on page 58.

## Our Supply Chain

Our Supply Chain is designed and driven to enable large-scale, long-term master planning and development and building projects in the state of NSW. Whilst the vast majority of our **direct** (Tier 1) supply chain is based and operates solely within Australia, our **indirect** (Tier 2 and beyond) supply chain is large and complex, characterised by numerous suppliers of varying scope and size in multiple overseas locations.

### Direct Suppliers

Products procured by Landcom are predominantly corporate in nature, such as catering, office furniture, IT equipment and amenities for staff.

Services produced by Landcom are categorised into either:

- Corporate services (e.g. legal and specialist consultant services related to the planning and development of land); or
- Project development services (e.g. principal contracting and civil and landscape services).

During FY25, Landcom transacted with over 640 direct suppliers, spending over \$133 million AUD across a diverse range of products and services. Most of these suppliers provided Landcom with civil and construction works and related professional services, asset management including cleaning and security services. Less than 1% of these suppliers were based outside Australia.

### Indirect Suppliers (Tier 2 and beyond)

Landcom's indirect suppliers provide products and services related to Landcom's operations and include but are not limited to:

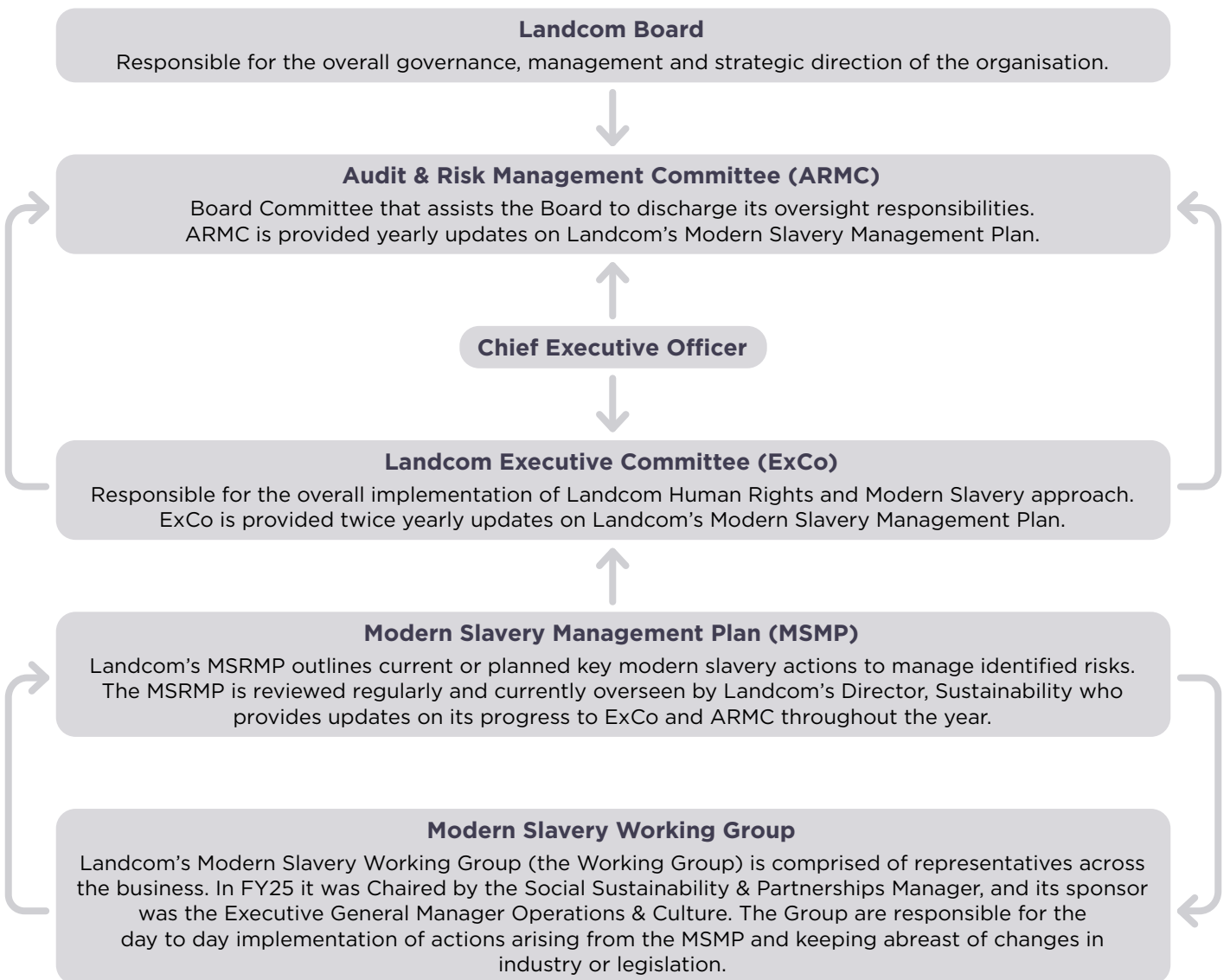
- corporate services (e.g. specialist consultants and their labour force)
- project development subconsultant services provided to principal contractors
- raw or manufactured materials and machinery that enable development works to occur.

Landcom recognises modern slavery risks increase with the provision of these products and services. At tier 2 and beyond, the transparency of operations becomes 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.

Through our ongoing engagement with select Tier 1 suppliers<sup>1</sup>, labour hire of migrant workers emerged as a key potential risk. We understand this to be a common indicator of heightened modern slavery risk and intend to engage with these identified suppliers in FY26 to understand more about these supply relationships. We understand the inherent risk of modern slavery with our extended supply chains and continue to advocate and collaborate for more transparent supply chains and further interrogate and appropriately respond to risks as they arise.

<sup>1</sup> 'Tier 1 suppliers' refers to suppliers that entered into a contract valued at \$150,000 AUD or more with Landcom during the reporting period that were required to complete our modern slavery supplier assessment questionnaire.

## Governance



One of the four key pillars of Landcom’s Sustainable Places Strategy is “Accountable & Collaborative Places”. This pillar directly reflects Landcom’s organisational commitment to robust governance and collaboration within our organisation and supply chain and includes a focus area on Human Rights. We recognise that effectively managing modern slavery risks requires strong governance frameworks, underpinned by cross-functional expertise and collaboration as well as defined responsibilities and accountabilities.

Landcom’s Board is accountable to our NSW Government Shareholder and Portfolio Ministers for the performance of Landcom against our Statement of Corporate Intent, Business Plan, Statement of Priorities and Statement of Expectations as prescribed by the relevant Legislation. The Landcom Board and Landcom’s ARMC maintain strategic oversight of Landcom’s modern slavery management approach. Landcom’s Executive Committee report to the Board against the commitments as made in Landcom’s MSMP.

### Our Modern Slavery Working Group

The Working Group meets monthly and is a cross-functional body comprised of representatives from Landcom’s Legal and Compliance, Procurement, Sustainability, Risk and Development functions. It is responsible for implementing and monitoring Landcom’s modern slavery commitments and acts as a point of contact for Landcom employees in relation to modern slavery and related matters.

# Modern slavery risks

## Industry Risks

The property and construction industry is inherently high-risk for modern slavery. Key risk indicators include a reliance on subcontracting and labour hire providers which can create complex, potentially opaque supply chains and reduce oversight of employment conditions. Short project timelines and cost-driven procurement pressures for large-scale developments can put pressure on upholding labour standards. Migrant workers and temporary visa holders, many of whom may face language and information barriers, visa dependency, or fear of retaliation are particularly vulnerable. A reliance on global supply chains for raw materials, critical minerals and manufactured component parts such as the supply of steel, stone and solar further elevates risk.

### We continue to identify the following key risks as most relevant for our business:



Forced labour risks for cleaning contractors (operational – offices and operations)



Forced labour risks for security contractors



Forced labour risks for supply and delivery of IT and telecommunications



Forced labour risks within the catering industry (operational – offices and operations)



Forced labour risks within specific materials supply chains for renewable infrastructure such as solar panels and batteries



Forced labour risks within specific materials supply chains such as stone, bricks, rubber soft fall and concrete



Forced labour risks within finishing trades within projects, developments and communities



Forced labour risks highlighted within specific countries and sectors e.g. North Korea, China for protective PPE wear and uniforms

In FY25 we conducted a process to further understand industry risks considering the material changes to Landcom's business with the introduction of the new PMO development arm of the business and the implications of risk in our value chain that it presents. We intend to embed these findings in our FY26 approach to risk mitigation.

## Operational Risks

In relation to our direct operations, we maintain a strong culture of speaking up as well as systems that enable us to identify and address issues including protected whistleblower disclosures. We are acutely aware that whilst our workforce mostly comprises local, directly employed and highly skilled workers, our operations and supply chain requires consistent review, monitoring and testing of controls to ensure we are identifying and managing modern slavery.

## Supply Chain Risks

The majority of Tier 1 suppliers who are required to complete our modern slavery SAQ continue to report the following risk profile attributes, making their operations or supply chain susceptible to modern slavery:

- high proportion of sub-contractors
- outsourced recruitment practices as well as employees or workers from overseas, including temporary or migrant workers
- high volume of labour hire, little or no oversight of suppliers' sub-contractors or third parties' products
- varying degrees of investigation into their own operations or supply chains beyond Tier 1

Whilst we didn't receive any SAQ responses in FY25 confirming sourcing of materials from overseas, we know that this is common practice for suppliers with complex supply chains. As such we will continue to interrogate these responses through targeted supplier engagement in FY26.

## How we assess and address modern slavery risk

Identifying modern slavery risks specific to Landcom requires an understanding of our potential as an organisation to cause, contribute or be directly linked to modern slavery through our operations and supply-chains. We continue to be guided by the United Nations Guiding Principles on Business and Human Rights to help identify and respond to modern slavery risks.

In FY19, Landcom commissioned a Human Rights Salience Assessment from E&Y which laid the foundations upon which we began to identify salient modern slavery risks in our organisation. By understanding the affects we may have on rightsholders at an individual and collective level, we identified the most critical modern slavery issues.

We continue to supplement and review the currency of these risks each year through a combination of inherent risk assessment processes, the review of supplier responses through our SAQs, knowledge-sharing through our membership of the PCA Human Rights and Modern Slavery Working Group and consultation with industry experts.

Our MSMP guides our approach to managing our modern slavery risks and was developed in consultation with industry experts. Progress against the MSMP is reported at varying stages each calendar year to the Landcom Executive Committee, Board and Audit and Risk Committee. For further information on our recent MSMP review, see [page 12](#). For further information on our progress against our commitments as set out in the MSMP, see our 2025 Sustainability Report under the Accountable & Collaborative pillar on page 35.



# Our Progress in FY25

## Maturing our Approach

We developed a three year roadmap to support the delivery of an informed, fit-for-purpose and effective modern slavery program.

Informed by stakeholder feedback, maturity analyses and best practice research, the roadmap aims to mature our approach to ultimately improve people's lives by:

- embedding due diligence
- reflecting best practice (including lived experience)
- supporting Landcom's strategic intent
- 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, the Working Group will use the roadmap to guide the implementation of key actions and projects.

## Maturing our Risk Assessment Process

In FY25, we conducted a high-level independent review of our salience assessment which originally identified our most important risks, and to assess the results for currency. This review indicated that the salient risks identified in FY19 remain current, with some new risk indicators arising from material business changes such as Landcom's electrification mandate and the introduction of Landcom's Built Form division (PMO) in FY25. We intend to incorporate these updated salient issues into policies and procedures and will continue to monitor emerging modern slavery risks and issues through an annual currency review and a more thorough salience assessment every 2-3 years.

It was also the second year that we assessed our procurement spend for inherent modern slavery risks using the Inherent Risk Identification Tool (IRIT) from the Office of the NSW Anti-Slavery Commissioner. From our FY25 IRIT assessment, we 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 and will form the basis for making targeted improvements in supplier mapping in FY26.

## Maturing our Management Approach



### Risk Management

During FY25, Landcom continued to include modern slavery risks in its operational risk register, based on the United Nations Guiding Principles (UNGPs) continuum of harm. Landcom also updated its Strategic Risk Register noting that the addition of Built Form and PMO activities presents new operational risks to Health, Safety and Environment, throughout the lifecycle of our projects.

Supplier risk continued to be categorised based on inherent risk analyses and prequalification responses received by suppliers and managed through the MSMRP.

During the reporting period, we also reviewed and updated our MSMP in line with industry best practice. The revised plan which is now titled Modern Slavery Risk Management Plan (MSMRP), outlines clear objectives, actions, metrics and accountabilities to help us deliver meaningful outcomes.

In FY26, we will engage the members of Landcom's Modern Slavery Working Group to finalise metrics and implementation, using the new MSRMP to guide and measure progress.



### Policies and Procedures

During the reporting period, we 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 as part of our ongoing broader review of our Human Rights approach.



## Training

### Staff

Modern slavery training is required of all new starters at Landcom, with re-training required for all staff every two years. In FY25 we achieved a completion rate of 74% for all new starters. We also commenced work to update the training content in partnership with The Freedom Hub's Survivor Advisory Board (SAB) to assist with embedding lived experience into its design and delivery. In FY26, we will review and incorporate the SAB's feedback into the updated modules for rollout to our staff.

During the reporting period, we also identified the need to increase awareness of and engagement with modern slavery amongst our staff and other stakeholders. As a result, we have commenced the development of an internal Engagement Plan that will prioritise communicating modern slavery in a way that is relevant, targeted and role-specific, using various communications channels including our Staff Newsletter, email updates from our CEO and a panel discussion with representatives from the Red Cross, The Freedom Hub and the CEO of Better Sydney in FY26.

### Suppliers

To tailor our approach to engaging with and building the capacity of our suppliers, we continued to deploy our new, in-house 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 new 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 (OH&S) 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. We will continue to encourage our Tier 1 suppliers to roll the training out to their sub-contractors to continue to build supply chain maturity in FY26.



## Grievance Mechanisms and Remediation

During FY25, we maintained our OH&S incident reporting system 'SafeMe' which notifies key Landcom personnel of any incidences of modern slavery. Our modern slavery reporting protocols that support 'SafeMe', continue to be formally embedded into Landcom's Incident Response Plan.

We also 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.

Our Health Safety and Environment (HSE) team expanded the display of posters communicating how to access 'Speak Up' at all sites to ensure they were visible and accessible to workers. We also began discussions on embedding education of the 'Speak Up' platform into site inductions for contractors in FY26.

Our Remediation Plan is informed by the United Nations Guiding Principles on Business and Human Rights and adopts the "protect" principal during Phase 1 to safeguard the rights of the complainant and is published on our corporate website.

During the reporting period, no grievances were raised through our grievance mechanisms in relation to modern slavery, nor did any reported instances of modern slavery require remediation. We understand that this does not necessarily mean that there were no instances of modern slavery or related instances throughout the reporting period within our value chain, and therefore we intend to interrogate this metric through a targeted review of both our remediation plan and grievance mechanisms in FY26.

In FY25 we engaged the Freedom Hub's SAB to review the remediation plan and provide targeted recommendations. In FY26, we will also participate in a targeted workshop led by The Freedom Hub to run hypothetical scenarios to test our response mechanisms and protocols within our Remediation Plan. We will then integrate the findings from the targeted review into our Remediation Plan.

---

*"Changing culture within the organisation will help to minimise abuse. There should be a clear path to training teams and contractors and include training on trauma-informed care and practices."*

Review of Landcom's Training and Remediation Guide - Freedom Hub Survivor Advisory Board member.

---



## Prequalification for supply

During the reporting period, we continued as a founding consortium member of the Property Council of Australia's Supplier Platform, designed to engage suppliers in multitiered supply chains and assess for risks of modern slavery through the deployment of supplier modern slavery assessments.

Our pre-qualification requirements are embedded into our procurement processes. These include the completion of our Supplier Code of Conduct by all Landcom suppliers, and the completion of our modern slavery SAQ for suppliers with contract spend with Landcom of \$150,000 AUD or more. Suppliers must complete the Supplier Code of Conduct prior to the execution of a contract and are required to update their responses to the SAQ annually for currency. Since the introduction of this integrated process, we've seen consistently high supplier response rates, allowing greater visibility of our supplier risk characteristics and profiles that we can review, interrogate and improve upon year on year.

During FY25, Landcom engaged 77 suppliers who have previously held contracts with Landcom and 70% of these suppliers completed a modern slavery assessment. We learned the following their completed the SAQ:

- 68% suppliers said they are not required to report under the Act
- 57% said they used sub-contracting and/or third-party recruitment organisations
- 14% said their organisation or their labour hire provider recruits employees or workers from overseas, including temporary or casual migrant workers
- 37% said that they do not have a grievance mechanism
- 35% said they provide training to current employees or suppliers around the topic of human rights and modern slavery
- 14% suppliers said they had not prepared a modern slavery statement but reported they were planning to do so in the next 12 months.

During FY25 we identified a few gaps in SAQ responses to certain questions that hold inherent high risk including sourcing manufactured products or services from overseas which we intend to interrogate in FY26.

Additionally, Landcom engaged 25 new suppliers in FY25 who had never held a contract with Landcom and 76% of these suppliers completed a modern slavery assessment. We learned from these new Landcom suppliers that:

- the vast majority of them are not required to report under the *Modern Slavery Act 2018* (Cth), however around a quarter of these companies still provide training to current employees or suppliers around the topic of human rights and modern slavery
- just over 40% of them use sub-contracting or third-party recruitment organisations.

As a result of these insights and by focusing on the areas within supplier SAQs that indicate inherent risk, we intend to take targeted action in FY26 to address these risks areas by:

- identifying inherent high-risk suppliers for targeted engagement including those that use sub-contracting and/or third-party recruitment organisations
- offering support for modern slavery statement development for the suppliers who identified their intention to complete a statement in FY26 and educational support for suppliers that are not required to report under the Act
- offering 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
- ask targeted questions to understand how suppliers are supporting the needs of workers for those organisations that said their organisation or their labour hire provider recruits employees or workers from overseas.

Some of the results pose a challenge for our supplier engagement approach, in that many of the responses are either incomplete or require further interrogation. As part of our targeted current state review of our due diligence procedures in FY26, we will include a thorough review of our SAQ process, including response and engagement gaps around recruitment of overseas workers and sourcing of materials from overseas.



### **Engage with high-risk suppliers to build supply chain maturity**

During FY25, we continued to formally engage with several Tier 1 contractors. We held a deep-dive supply chain risk-mapping workshop with a high-risk security and cleaning supplier. The workshop allowed us to understand how the supplier is mitigating the risks within their supply chain, the actions they are taking to support their sub-contractors and has strengthened our understanding of their operations across 28 Landcom project sites.

We also engaged 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. A key example included 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.



### **Contract and tender clauses**

All Landcom contracts continued to include modern slavery clauses, 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.

During FY25, Landcom transitioned to a new contracting system. As a result, we deferred our FY25 commitment to conduct an internal review of our contract clauses in line with best practice guidance, to FY26.



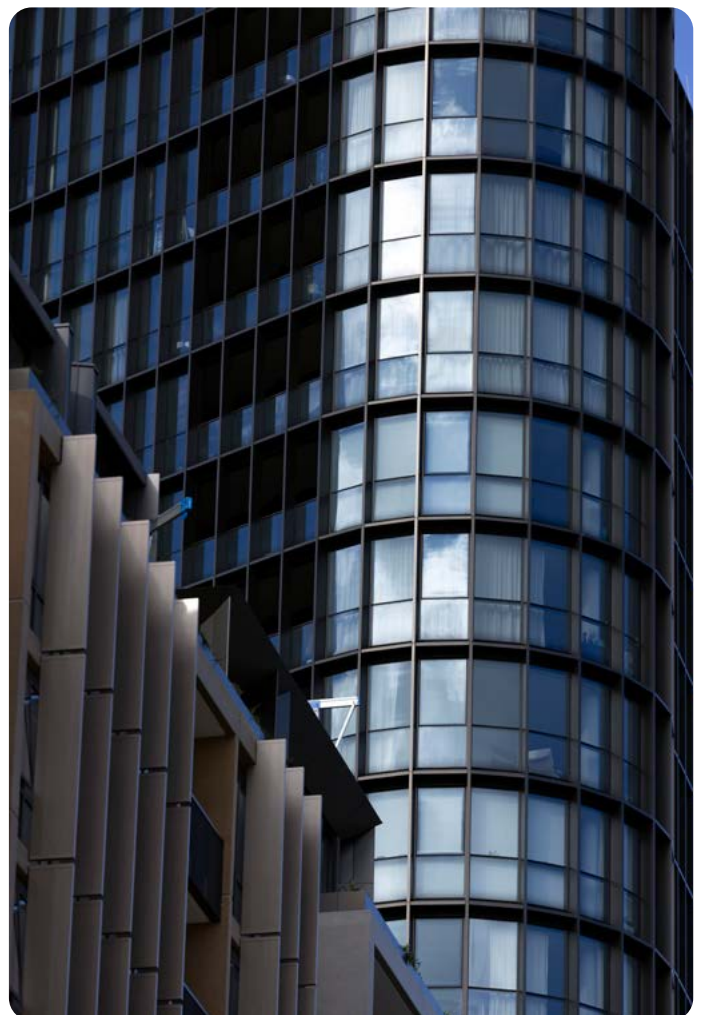
### **Broaden the scope of suppliers required to complete the modern slavery assessment where possible**

During the reporting period, we deployed a control mechanism for contract variations that push contract values above the current threshold of \$150,000 AUD. In FY26, we intend to incorporate this into a broader set of process improvements to formalise our due diligence procedures.



### **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)**

We conducted a thorough review of our existing modern slavery management plan (MSMP) in line with international and domestic best practice guidance. See [page 12](#) for more detail.





## Collaboration

### Property Council of Australia Human Rights and Modern Slavery Working Group

During FY25, 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. We also continued our membership of the Informed 365 Property Platform Modern Slavery Working Group, focussed on targeted supplier risk identification processes and technologies. Landcom remains actively involved in both Working Groups and continues to play a pivotal role in connecting key stakeholders in the property industry through events, research, knowledge-sharing and important collective action projects.

Throughout the reporting period, Landcom was actively involved in the following key 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.

---

*“Centring the voices of people with lived experience in what we do is essential to driving effective action and meaningful change in addressing modern slavery.”*

Natalie Maxwell-Davis, Senior Manager  
Modern Slavery Prevention and Response,  
Australian Red Cross.

Impact Metrics for Success guide launch, 18 June 2025.

---

- 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 [2025-2028 Strategic Plan for the Office](#).

### Developed a new relationship with another State-Owned Corporation

Toward the end of FY25, Landcom also formed a new collaboration 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.

## Assessing Effectiveness

To assess the effectiveness of our modern slavery commitments and actions, Landcom employs a range of quantitative and qualitative measures, including internal and external reviews, control testing and engaging with internal and external stakeholders. We understand that using a multi-faceted approach to assessment leads to better accountability and continuous improvement outcomes.

We respond to and manage our most salient modern slavery risks through the commitments as laid out in our MSMP. To ensure oversight of our modern slavery risk management processes, the MSMP and progress against its commitments is reported to Landcom's ARMC (a sub-committee of Landcom's Board) annually. Specifically, progress is monitored and reported during the reporting period against numeric indicators such as registration and completion rates for modern slavery training, the number of modern slavery incidents reported, grievances raised and instances of modern slavery requiring remediation.

We continue to engage independent third-party experts to review and provide recommendations with respect to our performance against our MSMP. During FY25, we worked with an external consultant to embed specific metrics into our MSMP, aligned to the afore-mentioned PCA Publication [Impacts Metrics Guide](#). The updated plan outlines clear, actionable targets and indicators to measure the success of modern slavery risk management and results-oriented KPIs.

In addition, our key modern slavery and related policies and statements (such as our [Human Rights Statement](#)), are reviewed regularly in response to Landcom's policy review schedule and emerging issues and trends.

We continue to have multiple control mechanisms to ensure compliance with our pre-qualification processes, including the requirement for all suppliers awarded a contract with Landcom valued at \$150,000 AUD or more to complete an SAQ. The assessment must be updated annually throughout the contract lifecycle to ensure the responses are current.

All suppliers who respond to a tender for Landcom contracts for \$150,000 AUD or more are required to complete the SAQ, regardless of whether they are successful. Prior to awarding the tender, Landcom's procurement confirm that the successful supplier has completed the SAQ, with any non-completion flagged to Landcom's procurement team.

## Improving our assessment processes

Assessing and measuring the effectiveness of our actions remains a key focus for our modern slavery approach. In FY26, we will review this requirement in line with best practice guidance and make amendments to 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.

## Consultation

As Landcom has no additional owned or controlled entities, we are not required to respond to the criterion as set out in section 16(g) of the *Modern Slavery Act 2018* (Cth). However, as a NSW state - owned corporation with dual reporting obligations under both federal and state modern slavery legislation, we understand that effective stakeholder engagement is an essential foundational step to developing a robust approach to addressing modern slavery and requires an understanding of those stakeholders that affect, have the potential to be affected by and most importantly, are directly affected by modern slavery risks. Accordingly, we continue to engage both internally and externally as disclosed in this statement and our [Annual Report on page 72](#).



Creating more affordable  
and sustainable communities

In the spirit of reconciliation, Landcom respectfully acknowledges the Traditional Custodians of Country throughout Australia and recognises and respects their continuing cultural heritage, beliefs and connection to land, sea and community. We pay our respects to their Elders past and present. Country across Australia always was and always will be traditional Aboriginal land.