

# MODERN SLAVERY STATEMENT

FY24



**LANDCOM**

# Modern Slavery Statement

## 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 the Modern Slavery Act 2018 (Cth), s. 16(1)(a) – (g). See below to locate each criterion within the Statement.

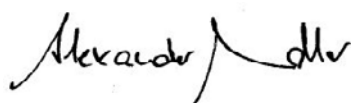
Section	Mandatory Criteria	Reference
Modern Slavery Act 2018 (Cth), s. 16(1)(a)	Identify the reporting entity	<a href="#">p.65</a>
Modern Slavery Act 2018 (Cth), s. 16(1)(b)	Describe the structure, operations and supply chains of the reporting entity	<a href="#">p.62</a>
Modern Slavery Act 2018 (Cth), s. 16(1)(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.65</a>
Modern Slavery Act 2018 (Cth), s. 16(1)(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.66</a>
Modern Slavery Act 2018 (Cth), s. 16(1)(e)	Describe how the reporting entity assesses the effectiveness of such actions	<a href="#">p.71</a>
Modern Slavery Act 2018 (Cth), s. 16(1)(f)	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
Modern Slavery Act 2018 (Cth), s. 16(1)(g)	Include any other information that the reporting entity, or the entity giving the statement, considers relevant	<a href="#">Our Progress since FY20 p.60</a>

## Landcom Modern Slavery Statement FY24

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 is Landcom’s fifth Modern Slavery Statement, published in accordance with the *Modern Slavery Act 2018* (Cth) (the Act) for the financial year 2023-2024. As a New South Wales state-owned corporation with no controlled entities, this statement covers Landcom as the reporting entity.

This Statement was approved by the Landcom Board, in its capacity as the principal governing body of Landcom, on 25 October 2024, and was signed by Alex Wendler in his role as the Chief Executive Officer of Landcom on 28 October 2024 in accordance with the Modern Slavery Act 2018 (Cth), s. 13(2)(c)-(d).



**Alex Wendler**  
Chief Executive Officer, Landcom

28 October 2024





# Our Commitment

Our [public human rights statement](#) affirms our commitment to 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 (UNGPs) on Business and Human Rights. We are committed members of the United Nations Global Compact Network Australia, report our contribution to the Sustainable Development Goals, and have addressed 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) (the Act) and the *Modern Slavery Act 2018 (NSW)*, our approach continues to also be informed by Australian state and federal legislative guidance.

Our commitment to addressing modern slavery is one of our two human rights focus areas. We understand that prioritising risks to people, focussing 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 Progress

## Laying the foundations

## Developing key processes

## Engaging our stakeholders

## Addressing grievance 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 PCA's 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

## FUTURE COMMITMENTS

### HOW DID WE DO IN 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

### FY25 and beyond

- Develop 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)
- Review our human rights salience assessment for currency
- Review and mature our Human Rights Statement
- Develop a Modern Slavery Policy
- Respectfully and appropriately engage people with lived experience and/or their representatives to mature our key modern slavery programs, policies and procedures.
- Deliver a deep dive workshop with a Tier 1 supplier to gain deeper visibility of our Tier 2 supply chain
- Implement our operational plan to support the progress and maturation of our Modern Slavery Management Plan

# Who we are & what we do

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

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 and functions, which includes (amongst others) being a successful and responsible developer that exhibits a sense of social responsibility and protects the environment.

---

Landcom's ambition is to make a positive difference to people's lives in NSW by increasing the supply, affordability and diversity of housing and creating sustainable communities.

---

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 and builder where appropriate and partner with NSW Government departments and external commercial entities to maximise our impact. During FY24, Landcom had 20 active [project sites](#) located across NSW. We use 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 a government agency or the private sector. These different structures mean we have varying levels of influence over project dynamics and outcomes. As a result, our leverage with respect to how we approach due diligence and effective modern slavery risk management must be dynamic and recognise these characteristics of our organisation. Landcom's operations are based in NSW with a main office in Parramatta and a secondary office in Sydney CBD. Further detail with respect to Landcom's Ownership and Legal Form, see our [FY24 Sustainability Report in Appendix F: GRI Content Index, indicators 2.1-2.11 \(p.84-92\)](#).





## Our people

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

As at 30 June 2024, Landcom's workforce was comprised of 191 employees. 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 here](#).

## Supply Chains

Our Supply Chain is designed and driven to enable large-scale, long-term master development and building projects in the state of NSW. Due to the core work Landcom undertakes in master planning development, Tier 1 of our supply chain for this function of the business is relatively concentrated.

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 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 FY24, Landcom transacted with over 867 **direct** suppliers, spending over \$120 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, buildings and facilities 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; and
- 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 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.

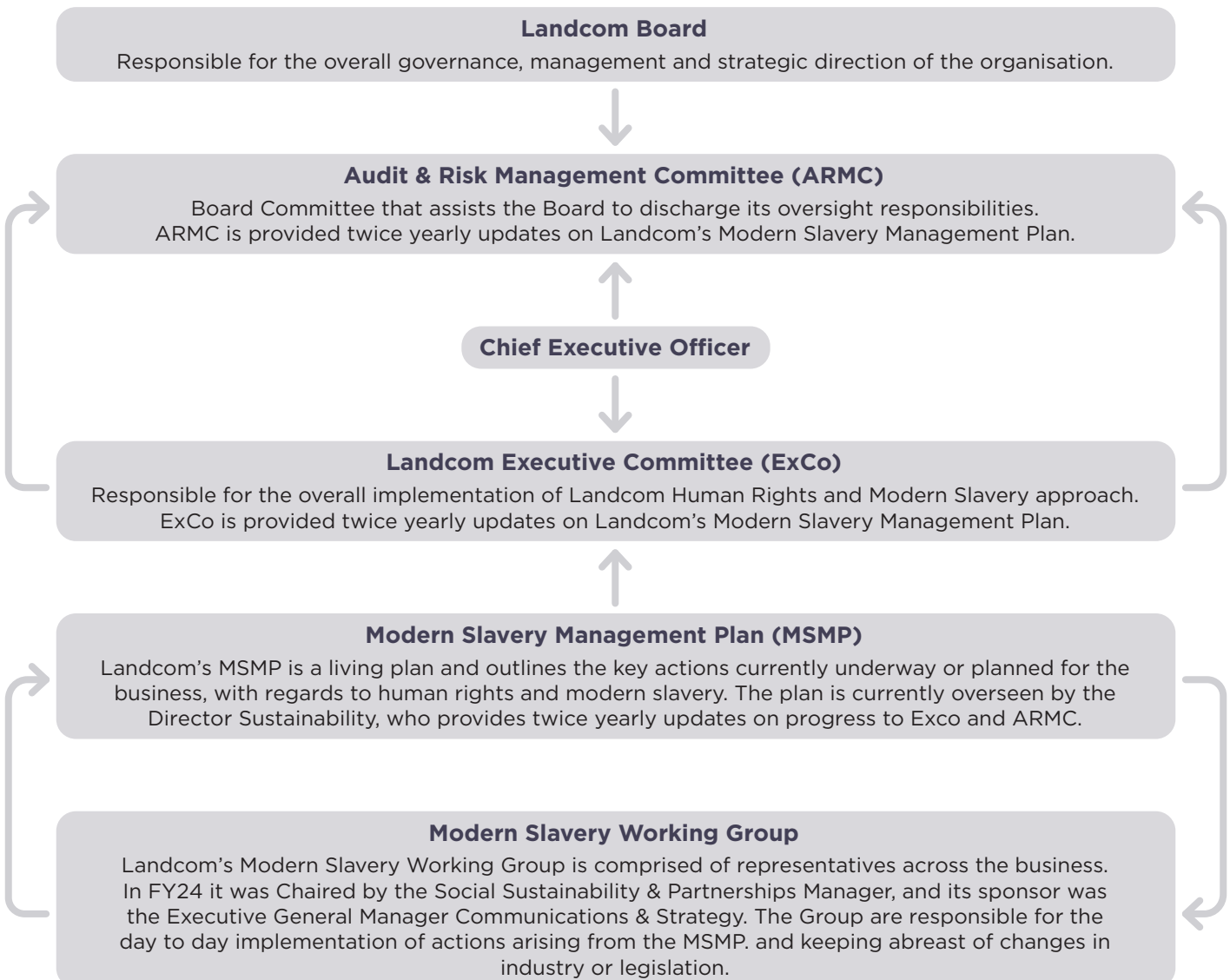
Through our ongoing engagement with select Tier 1 suppliers<sup>1</sup>, we understand their main overseas supply chains are generally based in countries such as the Philippines, Bangladesh and China. Landcom understands that our contractors may procure materials or products for use in our communities from these countries, such as Personal Protective Equipment (PPE) and uniforms.

Whilst Landcom has no reason to believe that any services or products related to our operations are associated with modern slavery, we understand the risk and continue to advocate and collaborate for more transparent supply chains and further interrogate and appropriately respond to modern slavery risks.

See [FY24 Sustainability Report](#) for further details.

<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 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 Audit and Risk Management Committee maintain strategic oversight of Landcom's modern slavery management approach.

Landcom's Executive Committee regularly report to the Board against the commitments as made in Landcom's Modern Slavery Management Plan (MSMP).

## Our Modern Slavery Working Group

Landcom's Modern Slavery Working Group (the Working Group) 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. The Working Group meets monthly and is sponsored by Landcom's Executive General Manager, Communications and Strategy.



# Modern Slavery Risks

Identifying modern slavery risks 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 continuum of involvement in identifying and responding to modern slavery risks.

In FY19, Landcom commissioned a Human Rights Salience Assessment from Ernst & Young 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.

Since then, we continue to supplement and review the currency of these risks each year through a combination of supplier responses through modern slavery assessments, knowledge-sharing through our membership of the PCA's Human Rights and Modern Slavery Working Group and consultation with industry experts.

In FY25, we will continue to monitor emerging modern slavery risks and issues and make adjustments to our modern slavery risks as identified in our human rights salience assessment, as required.

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. Whilst we consider the fact that our workforce is one comprised of highly skilled workers employed under contracts directly with Landcom in a largely domestic setting to be strong mitigations for instances of modern slavery, we are acutely aware that our assessment of modern slavery risk in our operations and supply chain requires consistent review, monitoring and testing of controls.

At an industry level, we continue to identify the following key risks as most relevant 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

The majority of Tier 1 suppliers who are required to complete our modern slavery assessment questionnaire 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
- high volume of labour hire, little or no oversight of suppliers' sub-contractors or third parties' products
- materials sourced from overseas, with little or no oversight of their production
- varying degrees of investigation into their own operations or supply chains beyond Tier 1

# How we assess and address Modern Slavery Risk

At an organisational level, we continue to be guided by the United Nations Guiding Principles on Business and Human Rights continuum of involvement (i.e. whether we cause, contribute or are directly linked to the identified instances of modern slavery) to shape our approach to risk identification, management and remediation.

In FY20, we adopted a Modern Slavery Management Plan (MSMP) in consultation with industry experts, which guides our approach to managing our modern slavery risks. Progress against the MSMP is reported regularly during each reporting period to the Landcom Executive Committee, Board and Audit and Risk Committee. For further information on our progress against our commitments as set out in the MSMP, see our [2024 Sustainability Report under the Accountable & Collaborative pillar on p.54](#).

## Our Progress in FY24

During the reporting period, we committed to progressing the actions in our MSMP and the commitments as made in our FY23 modern slavery statement. All actions in the MSMP and commitments made in our FY23 modern slavery statement were progressed in FY24 and remain ongoing, as detailed below.



### Risk Management

During FY24, Landcom continued to include modern slavery risks in its operational risk register, based on the (UNGPs) continuum of harm. We also commenced conversations to adopt Human Rights into Landcom's Risk Appetite Statement and Strategic Risk register and will progress this in FY25. Supplier risk continued to be categorised based on industry sector and prequalification responses received by suppliers in the modern slavery assessment questionnaire.



### Policies and Procedures

During FY24, we identified the need to review and update our Human Rights Statement and related policies as required, in line with international standards and frameworks, industry best practice and guidance as issued by the Office of the NSW Anti-Slavery Commissioner. We intend to review the statement as part of a broader review of our Human Rights approach in FY25.





## Training

### Staff

We continued to deploy modern slavery training to all our staff, with a 75% completion rate during the reporting period. Upon consultation with our learning and development and legal teams, we reviewed and updated the frequency with which future training will be deployed to our staff. Modern slavery training will now be required of all new starters upon commencement of employment with Landcom, with re-training required for all staff every two years.

Landcom's Executive Committee and CEO also undertook additional, targeted modern slavery training, delivered by experts from Better Sydney and the Australian Human Rights Institute. The session included an overview of the recommendations arising from the Statutory Review of the *Modern Slavery Act 2018* (Cth) (the Act), as well as case study examples of best practice and learnings from industry and the global regulatory context.

### Suppliers

We continued to deploy free training and resources to our Tier 1 suppliers through the Supply Chain Sustainability School, to be completed within six months of contract commencement.

To tailor our approach to engaging with and building the capacity of our suppliers, during FY24, we developed a 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 incident reporting system, 'SafeMe' (established in FY23). The module is intended to be delivered to all our Tier 1 suppliers in FY25. We will also encourage our Tier 1 suppliers to roll the training out to their sub-contractors to continue to build supply chain maturity.



## Grievance Mechanisms and Remediation

During FY24, we maintained our Occupational Health and Safety (OHS) incident reporting system 'SafeMe' which notifies key Landcom personnel of any incidences of modern slavery. Our modern slavery reporting protocols that support 'SafeMe', were also formally embedded into Landcom's Incident Response Plan.

We also maintained our confidential grievance mechanism 'Speak Up' (as previously deployed in FY23) and continued to deploy and monitor confidential reporting forms and boxes for our staff at our head office location and for contractors working on our project sites.

Additionally, in FY24 we liaised with our OHS team to ensure that posters communicating how to access 'Speak Up' were appropriately displayed at selected site offices to ensure they were visible and accessible to workers.

During the reporting period, our remediation plan (as endorsed by Landcom's CEO in June 2023) was [published](#) on our corporate website. The plan is informed by the (UNGPs) on Business and Human Rights and adopts the "protect" principal during Phase 1 to safeguard the rights of the complainant.

During the reporting period, no grievances were raised through our existing 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 we will continue to interrogate this metric through a targeted review of our systems and policies in FY25.

During FY24, we commenced our engagement with The Freedom Hub's Survivor Advisory Board to assist in guiding a review of key modern slavery policies and procedures, including hypothetical scenario testing with a view to embed lived experience into our response mechanisms and protocols.





### Prequalification for supply and sale

During the reporting period, we continued as a founding consortium member of the PCA'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 supplier assessment questionnaire 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 modern slavery assessment questionnaire 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.

Of the 45 suppliers that met the threshold to complete the modern slavery assessment questionnaire, we received a 87% completion rate, reflecting the consistent and successful integration of this assessment process into our existing procurement processes for contracts and tenders.

During FY24, we learned the following from Landcom suppliers who completed our modern slavery assessment questionnaire:

- 59% said they were not reporting entities under the *Modern Slavery Act 2018* (Cth) (the Act)
- 54% said they used sub-contracting or third-party recruitment organisations
- 18% said their organisation or their labour hire provider recruits employees or workers from overseas, including temporary or casual migrant workers
- 51% said they provide training to current employees or suppliers around the topic of human rights and modern slavery
- 10% said they source manufactured products or services from overseas that contribute to the delivery of their products or services, namely from The Philippines, Bangladesh and China.
- Two suppliers said they had not prepared a modern slavery statement but reported they were planning to do so in the next 12 months and had also responded similarly during the previous reporting period. In FY25, Landcom intend to engage these suppliers to provide support and guidance if required in the preparation of their modern slavery statement.

As part of Landcom's head office refurbishment, Landcom facilitated the deployment of our modern slavery assessment to all of the Tier 1 supplier's sub-contractors (Tier 2), providing us with greater visibility of our supply chain. In FY25, we intend to conduct a review of the data provided to identify modern slavery risks and opportunities and to collaborate and engage with the relevant suppliers.

We also introduced prequalification requirements for all sales of Landcom assets to proponents with a consolidated revenue over \$50 million AUD, requiring proponents to demonstrate how they comply with the *Modern Slavery Act 2018* (Cth) (the Act).



### 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 FY24, to support greater consistency for suppliers and encourage engagement around modern slavery risks, we participated in an industry review of Modern Slavery Contract Clauses and Supplier Codes of Conduct, comparing de-identified contract clauses around human rights and modern slavery, as well as assessment against publicly available state and federal examples. In FY25, we intend to continue build on this work and complete an internal review of our contract clauses, in line with best practice guidance as issued by state and federal legislative entities.



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

During FY24, we continued to formally engage with one of our Tier 1 civil and construction works contractors, with a view to designing and delivering a deep-dive supply chain risk-mapping workshop in FY25.

We also collaborated with Landcom's Sustainability Team, Project Managers and a principal contractor at our Panorama project in North Wilton to guide local sourcing and other sustainability initiatives, including the reuse of spoil and other materials. As a result, the project successfully avoided all export or import of fill for bulk earthworks, any export of green waste generated on-site and managed the re-use of large amounts of materials found on site. The re-use of these materials reduced the need to procure and import materials to site and this also helped reduce Landcom's overall civil works embodied carbon volumes.

Given the success of the program, we will engage with the relevant stakeholders to understand key learnings for our supplier workshop in FY25, and to identify opportunities for the integration of modern slavery risks in the responsible sourcing plan, where appropriate.

Landcom also engaged with another Tier 1 supplier who delivered our head office refurbishment project in Parramatta to gain a deeper insight into their Tier 2 suppliers and beyond. As a result, all Tier 2 suppliers onsite were issued with and completed Landcom's modern slavery assessment, including key questions with regards to their supply chain and modern slavery risk exposure. This was an important step towards expanding our visibility of our Tier 2 supply chain and beyond, and we will continue to further interrogate the responses in FY25.



### **Continue to be actively involved with the Property Council Human Rights and Modern Slavery Working Group**

During FY24, we continued our membership of the PCA's Modern Slavery Working Group. Landcom's Social Sustainability and Partnerships Manager continued in their role as the Working Group's co-chair.

During the reporting period, a decision was made to separate the Working Group into two sub-groups, with one (renamed the Human Rights and Modern Slavery Working Group) to focus on broader, strategic human rights issues and collaborative projects, with the other 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:

- On International Day for the Remembrance of Victims of Slavery, in partnership with Edge Impact, the PCA launched the 'Pathway to Respecting Human Rights and Addressing Modern Slavery Risks' – a guide designed to give property and construction businesses and their suppliers practical and actionable steps for respecting human rights and tackling modern slavery.
- We attended a Modern Slavery Statement Review where a panel of independent experts provided members with feedback on the strengths, weaknesses, opportunities, threats and emerging risks in relation to their FY23 modern slavery statements. This is one method by which continuous improvement and collaboration is embedded within the Working Group's schedule of projects each year.
- Professor John McMillan AO (review lead on the Statutory Review of the *Modern Slavery Act 2018* (Cth) (the Act)) spoke to members about the recommendations contained within the review and implications for members.



### **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).**

During FY24, we engaged an external consultant to assist in developing an operational plan to support the implementation of our modern slavery commitments. The operational plan included suggested workstreams, actions, key metrics and associated indicators for measuring effectiveness for all commitments, including those within our MSMP.

As part of that engagement, a current state assessment of progress against our modern slavery commitments (which includes the commitments listed in our MSMP) was conducted, taking into consideration relevant research, industry performance and practice.

In FY25, as part of a broader strategic review of our Human Rights approach, we intend to review our key modern slavery policies and programs, including our MSMP, in line with state and federal legislative guidance.



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

During the reporting period, we identified the need to deploy a control mechanism for contract variations that push contract values above the current threshold of \$150,000 AUD. In consultation with Landcom's procurement and legal teams, we intend to implement the control in FY25 as part of a broader review of Landcom's modern slavery due diligence mechanisms.



# 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, audits, 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 Audit and Risk Management Committee (a sub-committee of Landcom's (Board) twice 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 the MSMP. During FY24, we worked with an external consultant to review the recommendations made by Professor John McMillan in his Report on the Statutory Review into the *Modern Slavery Act 2018* (Cth) (the Act) tabled in May 2024, with a view to identifying the most relevant and incorporating them into our operational plan workstreams to ensure that when recommendations are enacted, we can readily respond.

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 our pre-qualification process, which includes completing our modern slavery assessment questionnaire. 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 assessment, regardless of whether they are successful. Prior to awarding the tender, Landcom's procurement confirm that the successful supplier has completed the assessment, with any non-completion flagged to Landcom's procurement team.

## Improving our assessment processes

Assessing effectiveness was a key focus of a current state and maturity assessment conducted during the reporting period. We identified that whilst the MSMP continues to be an integral mechanism by which we progress and monitor our initiatives, there is ample opportunity to develop a more targeted and structured approach to measuring the effectiveness of our actions, to ensure accountability and continuous improvement year on year.


As a result, we reviewed the current measures employed to assess the effectiveness of our actions, identified gaps, and completed a list of a mix of qualitative and quantitative indicators for all our individual commitments. In FY25, these indicators will be reviewed by Landcom's Modern Slavery Working Group and subject matter experts to ensure they are relevant and appropriate, to then be monitored and reported on in FY25.

## Consultation

As Landcom has no additional owned or controlled entities, we are not required to respond to the criterion as set out in the *Modern Slavery Act 2018* (Cth), s. 16(1)(g). We understand that effective stakeholder engagement 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.



Creating more affordable  
and sustainable communities

A thick, wavy line in orange, purple, blue, and green colors flows from the top left towards the bottom right, curving around the text area.

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, present and emerging. Country across Australia always was and always will be traditional Aboriginal land.