

# Modern Slavery Statement



30 June 2023



# About this Statement

Lewis Land Holdings Pty Limited (the ‘Company’), being the parent company of the Lewis Land Group (the ‘Group’), is pleased to release our fourth Modern Slavery Statement (the ‘Statement’), which covers the financial year from 1 July 2022 to 30 June 2023 (‘FY23’), published in accordance with the Modern Slavery Act 2018 (Cth) (the ‘Act’).

The Company is a reporting entity pursuant to section 5 of the Act. The Group consists of the Company and its subsidiaries, being all entities over which the Company has control for accounting purposes. The material subsidiaries are listed in Appendix One.

This Statement outlines the Group’s approach in ensuring that our business and supply chains are managed within a framework that mitigates modern slavery risk, the actions taken during the reporting period and how the Group intends to continually improve its processes in future years.

## Consultation with entities

In preparing this Statement, we actively engaged and consulted with the relevant business units, divisions and entities which form part of the broader Group.

Our Corporate support function facilitates co-ordination across the Group. We co-ordinate our modern slavery strategy through tasking actions to divisional leaders to identify, assess and mitigate modern slavery risk in their operations and supplier relationships.

## Modern Slavery Act Reporting Criteria

Criterion	Page
Identify the reporting entity	2
Describe the process of consultation with any entities that the reporting entity owns or controls	2
Describe the structure, operations and supply chains of the reporting entity	3-5
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	6-7
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	8-9
Describe how the reporting entity assesses the effectiveness of such actions	10

## Approval

The Statement has been approved by the Board of Directors of the Company on 15 December 2023 and signed on their behalf by:



**Brett Draffen – Chief Executive Officer**

# About Lewis Land Group



## Our commitment

The Group is committed to reducing the risk of modern slavery practices in our business operations and supply chains and responding to incidents if they occur.

As a family business, we value integrity in our relationships and strive to create a safe, inclusive and high-performing environment for our people. For more than 65 years we have helped shape the residential, retail and recreation experiences of communities across Australia, creating healthy, positive spaces for family, personal growth and connection. These should not be built at the cost of the most vulnerable.

Founded in 1957, Lewis Land Group is Australia's oldest private property developer.

## Our structure

Our operations are structured across three operating divisions, being Retail, Development and Leisure, which are co-ordinated by our Corporate support function. Further details of the operations, relevant subsidiaries and supply chain of each operating division and the support function are included on the following page. For more information, refer to [www.lewisland.com](http://www.lewisland.com).

A complete list of the Group's controlled entities as at 30 June 2023 can be found in Appendix One.

Our operations are solely Australian based (New South Wales, Queensland, and South Australia) and our Tier One relationships are with domestic and local suppliers of goods and services. We recognise that within our Tier Two supply chain and beyond, goods and services will be sourced from international suppliers, which operate under different governance and legislative systems to protect labour and human rights.

We operate under a robust corporate governance framework and recognise that this is critical to the broader success of the Group. The Group's Board oversees our corporate governance framework and has delegated authority to our Chief Executive Officer to assist in the oversight of compliance and risk, including modern slavery issues.

The Group's divisions are actively involved in our modern slavery response. This includes developing and implementing our modern slavery policies and practices across our direct workforce and supply chain.

# Our Operations



## Retail

Our outdoor retail venues provide outlet and convenience shopping experiences to communities across Australia.

We own and operate three centres:

- Harbour Town Premium Outlets, Gold Coast, QLD
- Harbour Town Premium Outlets, Adelaide, SA
- Sovereign Hills Town Centre, Port Macquarie, NSW

We employ 27 team members (85% full time, 15% casual or part time) in our centre management operations. We procure cleaning and security services for all centres. Other businesses are engaged for utilities, property fit-outs, marketing, legal and other services.



## Developments

Our longstanding development operations have shaped residential communities stretching along Australia's eastern coastline.

Our most recent project is Sovereign Hills, located in Port Macquarie NSW. We are planning our next project, Harbour Shores in Biggera Waters QLD.

Our team of 6 members (all full time) manage these developments to ensure that people can enjoy world class public amenities and the local environment.

In community building, our team outsources architectural, design, civil engineering, building contractor and legal operations to a small pool of suppliers with whom we have had long-term relationships.



## Leisure

Our family friendly hotels and pubs are embedded in the heart of the community.

We own and operate four venues:

- The Fiddler, Rouse Hill, NSW
- Camden Valley Inn, Camden, NSW
- The Belvedere, Woody Point, QLD
- The Komo Hotel, Redcliffe, QLD

We employ over 600 employees (80% casual or part time, 20% full time) across hospitality and hotel operations. We prioritise engaging local businesses for our food and general supplies. Beverage products are sourced from large global suppliers. We procure ongoing cleaning and security services for all venues as well as laundry, linen and uniform suppliers. A Sydney firm assists us with international recruitment.



## Corporate

Our Corporate support team body oversees all of Group operations and is based in Sydney.

Our core team of 18 team members (all full time) act as the central communication point across our business functions. Corporate employees are overseen by the Chief Executive Officer, who reports directly to the Board of Directors.

As the central business unit, Corporate tends to engage financial, professional, property, technology (hardware and software), travel and insurance service providers.

# Our Supply Chain

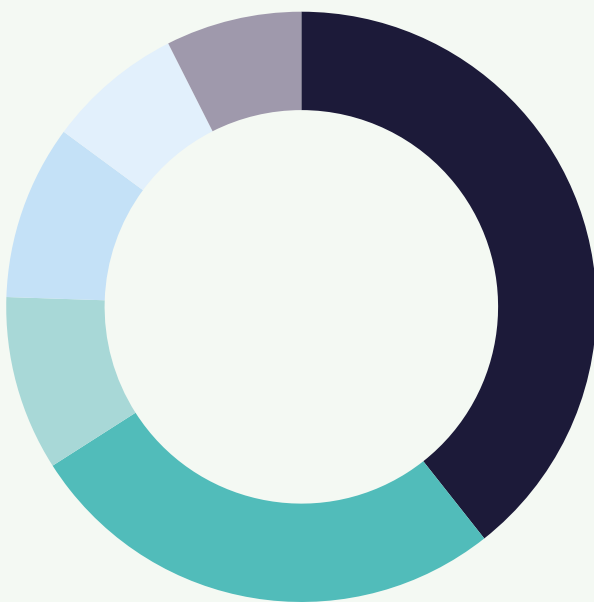
<p><b>~\$128 million</b></p> <p>FY23 procured goods and services</p>	<p><b>&gt;1,100</b></p> <p>Direct suppliers</p>
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## Summary

The Group sources a wide range of goods and services for its diverse operations across our three divisions and corporate support function, as described on the previous page. In FY23, we engaged directly with over 1,100 suppliers with total expenditure of approximately \$128 million.

## Spend by category

The Group's top spend by category in FY23 is highlighted below:



- Construction 37%**  
Includes: building contractors, building materials, deft and demolition, development contributions, furniture and hoardings
- Food and beverage 25%**  
Includes: suppliers of food and beverage to the Leisure division (net of rebates)
- Professional services 9%**  
Includes: accountants, architects, design, engineering, legal, project management, valuations
- Facility services 9%**  
Includes: cleaning, security, waste management
- Property maintenance 7%**  
Includes: air conditioning, electrical, garden, landscaping, security installation
- Rental and hiring services 7%**  
Includes: corporate office lease, equipment hire, leasehold properties

Supplier category spend includes both capital and operational expenditure and excludes payments that do not relate to goods and services (for example, rates and taxes).

## Direct supplier locations

The Group's operations are solely based in Australia and over 99% of our direct spend is to Australian Tier 1 suppliers.

Our Tier 1 suppliers have their own complex and diverse supply chains that can extend beyond Australian borders. This includes having many suppliers of materials or services who in turn

rely on many more suppliers, both domestic and international. Through our supplier assessment questionnaire (described on page 08) we know that some of our Tier 1 suppliers source goods and services from overseas, including jurisdictions known to present a higher risk of modern slavery according to the Global Slavery Index (GSI).

# Modern slavery risks in our operations and supply chain

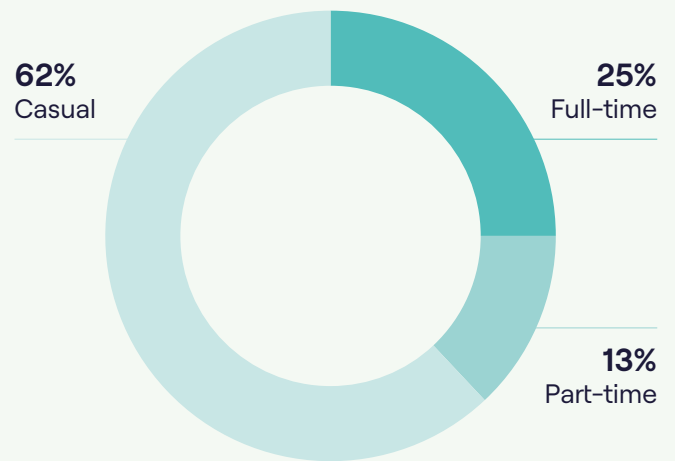
## Risks in our workforce

We consider the risks of modern slavery practices within the direct workforce of our Retail division, Development division and our Corporate support function as very low. Our employees are primarily working in professional services exclusively within Australia where employee-employer relations are strictly regulated by legislation and modern awards. These are smaller teams, conducting predominately office based activities, which combined with a robust reporting framework, can reduce the likelihood of exploitation.

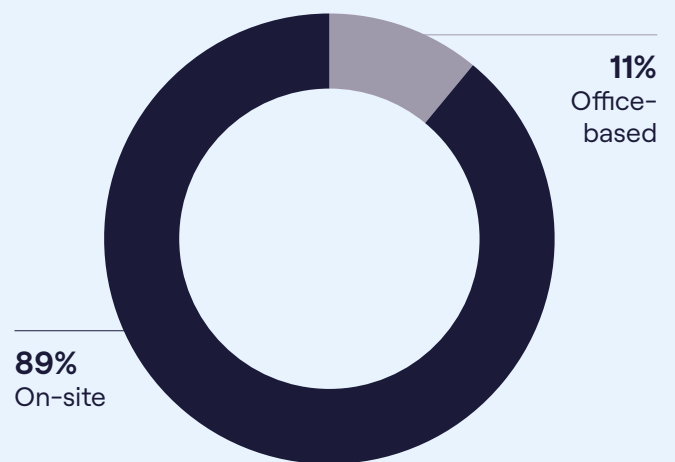
We recognise that risks of modern slavery practices in our hospitality focused Leisure division to be comparably higher due to the size and demographics of the workforce. We are committed to an employment framework that protects our workforce. All venues are subject to the Group’s corporate compliance framework as it relates to labour.

The Group implements a range of measures to ensure compliance with relevant employment instruments and obligations, including use of first-class time and attendance systems (with award interpretations and an employee self-service portal enabling staff to view rosters, payslips including rates and hours worked, and updating personal details), central issuance of employment contracts, maintenance of a detailed suite of employment policies, periodic engagement with consultants to verify compliance and reporting, whistleblower and grievance policies and procedures, and central oversight of venue management.

### Terms of employment



### Location of employment



## Risks in our supply chain

### Principles

We understand that identifying modern slavery risks in a supply chain is complex and needs to extend beyond Tier One suppliers.

Identification of modern slavery risk spans both our own operations and our supply chain. We have drawn on the UN Guiding Principles (UNGP) on Business and Human Rights, the recognised

standard for addressing business-related human rights harm, to build our awareness and framework, which assists in the process of identification of any potential risks.

Using the UNGP’s, we seek to assess and prioritise our modern slavery risks in relation to the Group’s potential to:

Type	Description	Our assessment
Cause	Operations directly result in modern slavery	No to Low Risk
Contribute to	Operations and/or actions may contribute to modern slavery	Low Risk
Be directly linked to	Operations, products or services may be connected to modern slavery through activities of another entity	Low to Medium Risk

### Risk assessment

The following areas in our operations and supply chains remain particularly at risk of modern slavery practices:

<div data-bbox="143 1350 798 1444">  <p><b>Building contractors and materials suppliers</b></p> </div> <div data-bbox="143 1444 798 1538">  <p><b>Cleaning, security and housekeeping services</b></p> </div> <div data-bbox="143 1538 798 1632">  <p><b>Laundry, linen providers and uniform suppliers</b></p> </div> <div data-bbox="143 1632 798 1724">  <p><b>Distribution of food and other consumable goods</b></p> </div>	<div data-bbox="849 1350 1495 1467">  <p><b>Utilities, including electricity, water supply, waste and sanitary disposal</b></p> </div> <div data-bbox="849 1467 1495 1561">  <p><b>Air conditioning</b></p> </div> <div data-bbox="849 1561 1495 1657">  <p><b>IT hardware and software</b></p> </div>
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Potential risks associated with the above industry categories include the types of workers (low skilled, temporary, casual, part-time and overseas student workers), child labour or forced labour at the

originating location, compliance with local labour laws, non-ethical sourcing of materials and products and overseas manufacturing in low-cost countries.

# Assessing and addressing modern slavery risks

## Supplier engagement

During the year, we utilised a specialised cloud-based modern slavery platform to survey our top spend direct suppliers through supplier Self-Assessment Questionnaires ('SAQ').

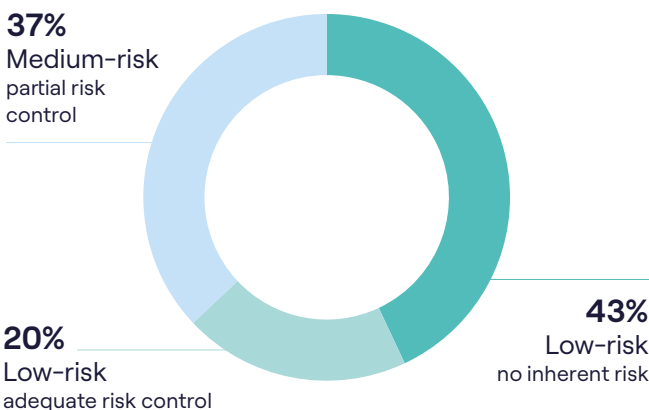
In undertaking this survey, our aim was to:

- Understand how modern slavery is perceived, identified and remedied by our suppliers with a potential to positively influence the engagement of suppliers (especially small businesses)
- Assess modern slavery risks in our supply chain and continually engage with our suppliers in order to continuously improve our response to modern slavery
- Undertake an assessment of our Tier 1 suppliers as well as extend our understanding of the lower tiers of our supply chain, including geographical location
- Embed these considerations into our procurement process and categorise suppliers based on the inherent risk of modern slavery

In this process we sent SAQ's to the Group's top 90 suppliers (in terms of expenditure) which represented approximately 60% of total Group expenditure. 59 of those suppliers (65%) responded to the request.

A summary of the key insights are:

### Risk category

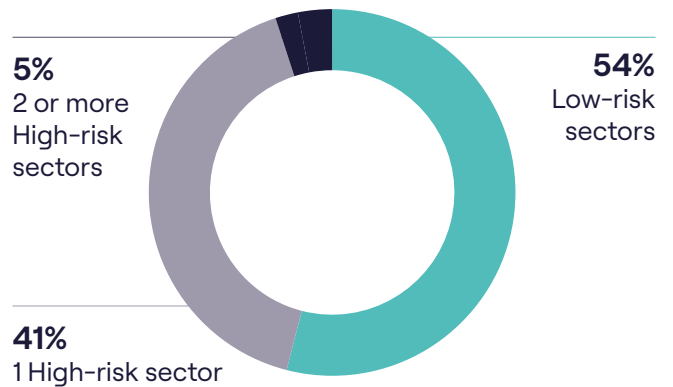


Nearly two-thirds of all supplier respondents are deemed 'low-risk' through either:

- No inherent risk (based on the suppliers geographical location, type of goods, industry sector and workforce parameters)
- Inherent risk (based on the indicators above) with adequate controls in place (including policies, assessments and awareness programs)

Pleasingly, no respondents were determined to be 'high-risk' suppliers.

### Industry sectors



The SAQ's sought responses on the the industry sectors that suppliers operated in. Over half of all supplier respondents only operate in low-risk sectors, whilst three suppliers operate in two or more high-risk sectors.

The most common 'high-risk' sector was Construction (25% of all respondents) followed by Manufacturing (7% of all respondents).



## Top actions

We identified that influencing suppliers to undertake the following actions could reduce the overall risk of modern slavery practices being present in our supply chain:

- Increase awareness through engaging in modern slavery risk training
- Implementation of appropriate policies (including supplier engagement), vulnerability assessment and recruitment screening
- Implement an operations-specific risk assessment process

## Other key actions

In addition to the previous page, a number of actions were taken during FY23 to embed the consideration of modern slavery risks into our processes, which included:

- Expanded awareness through online training modules to provide employees with tools on how to recognise and report modern slavery concerns
- Drafted risk assessment of our supply chain, including suppliers to all divisions, to identify any potential human rights and modern slavery risks
- Evolving supplier agreements to include modern slavery related clauses regarding compliance with the Act and taking reasonable steps to ensure there is no modern slavery in their supply chain

Further, the Group continues to assess the efficacy of its policies and frameworks, including those related to code of conduct; whistleblowing; procurement; contractors and sub-contractors; work, health and safety; recruitment and selection; and discrimination, harassment and bullying.

## Future priorities

In FY24, we will continue to mature processes across our supply chain to integrate modern slavery risk mitigation into our operations.

We believe the following to be our priority focus areas:

- Continue employee training (for all new starters, plus refresher courses) across all divisions to ensure information is shared and responsibility taken
- Build on the inaugural supplier SAQ's through:
  - Following-up non-respondents to complete the SAQ
  - 'Deep-dive' into select higher-risk suppliers (based on total spend and risk rating)
  - Engage with suppliers who provided responses (including on their specific risk assessment and specific action items to complete post-assessment)
- 'Deep-dive' into specific higher-risk industries (such as construction and facility services)
- Further integration of practices, policies and procedures to address potential risks, including documenting approaches to sourcing goods and services
- Broaden use of technology tools to improve our supplier monitoring and reporting mechanisms.

## Assessing the effectiveness of our actions

In assessing the effectiveness of our actions to reduce exposure to modern slavery, our focus has been on building and enhancing our existing risk frameworks to address modern slavery risks and strengthening our understanding and capabilities to identify potential modern slavery risks.



We monitored the effectiveness of the actions taken to mitigate modern slavery risks in our operations and supply chains through:

- Risk analysis: As described on page 08, we were able to risk-assess 59 of the Group's top suppliers (65%) which represented approximately 40% of total Group expenditure.
- Supplier engagement: During the SAQ process we were able to engage with a number of key suppliers to enhance their understanding of modern slavery.
- Employee awareness: We were able to raise awareness of modern slavery throughout the Group with over 95% of team members completing the online training module. All of the Group's Board of Directors, senior executive and key management completed the module
- Governance: We have included modern slavery provisions in new relevant contracts, particularly in relation to construction projects
- Risk management: Ongoing assessment and management as part of our risk management framework, including reporting to the Board

The Group's practices, policies and procedures appear to have been effective in addressing and potential modern slavery within our supply chains. During FY23, no instances of modern slavery were identified in the Group operations or supply chains.

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# Appendix One

## Controlled entities

All entities controlled by the Group are shown below (listed according to their division).  
All entities are wholly owned and were incorporated or established in Australia.

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### Retail

Lewis Capital Holdings Pty Ltd (ACN 001 327 902)  
Lewis Capital (Gold Coast) Pty Ltd (ABN 74 654 271 502)  
Lewis Capital (Adelaide) Pty Ltd as trustee for Harbour Town Adelaide Unit Trust (ABN 24 701 659 673)  
Lewis Capital (Sovereign Hills) Pty Ltd as trustee for Sovereign Hills Unit Trust (ABN 69 512 725 485)  
Harbour Town Centre Management Pty Ltd (ABN 21 001 302 610)  
Lewis Capital (Finance) Pty Ltd (ABN 44 654 271 815)

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### Developments

Lewis Developments Holdings Pty Ltd (ACN 653 839 724)  
Lewis Developments Pty Ltd as trustee for Lewis Developments Trust (ABN 46 308 542 030)  
PM Land Pty Ltd (ABN 67 602 713 771)  
Sovereign Hills Sales Pty Ltd (ABN 42 001 110 345)  
LLG Developments Pty Ltd (ABN 28 653 860 274)  
Harbour Shores Developments Pty Ltd (ABN 23 654 272 536)  
Harbour Shores South Pty Limited (ACN 654 296 045)  
Harbour Shores North Pty Limited (ACN 654 295 753)  
BW Land (BG) Pty Limited (ACN 654 293 142)  
BW Land (HS) Pty Limited (ACN 654 293 160)  
BW Land (Industrial) Pty Limited (ACN 654 293 875)  
BW Land (TD) Pty Limited (ACN 654 273 462)

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### Leisure

Lewis Leisure Holdings Pty Ltd (ACN 004 928 465)  
Lewis Leisure Pty Ltd as trustee for Lewis Leisure Trust (ABN 56 346 166 957)  
Neridah Nominees Pty Ltd as trustee for Woody Point Unit Trust (ABN 43 423 443 086)

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### Corporate

Lewis Land Holdings Pty Ltd (ABN 68 008 522 496)  
Lewis Land Group Pty Ltd (ABN 52 008 524 801)  
Lewis Land Management Pty Ltd (ABN 60 653 840 530)