

# Contents

<i>Foreword</i>	<b>1</b>
<i>About this report</i>	<b>1</b>
<i>Consultation with Entities</i>	<b>1</b>
<i>Operations and Activities</i>	<b>2</b>
About Mirvac	2
Our Purpose	2
Our Values	2
Our Commitment	3
FY21 in Review	3
Our Organisational Structure	4
Supply Chain Overview	5
<i>Understanding our Modern Slavery Risks</i>	<b>6</b>
Understanding our Modern Slavery Risks	7
Collaborative Risk Assessment	8
Looking Forward	8
<i>Assessing and Addressing Risks</i>	<b>9</b>
FY21 Snapshot	9
Governance	10
Our Policy Framework	11
Supplier Engagement and Due Diligence	12
The Vendor Journey	12
Due Diligence Tools	12
PCA and Supplier Assessments	13
Engagement and Training	14
Remediation Processes	14
Remediation Case Study	15
<i>Effectiveness</i>	<b>16</b>
Assessing the Effectiveness of our Actions	16
Key Performance Indicators	16
<i>Collaboration</i>	<b>17</b>
Stakeholder Map	18
<i>Next Steps</i>	<b>19</b>





## Foreword



### ACKNOWLEDGMENT OF COUNTRY

Mirvac acknowledges Aboriginal and Torres Strait Islander peoples as the Traditional Owners of the lands and waters of Australia. We recognise that we all live, work and play on the traditional lands of Aboriginal and Torres Strait Islander peoples and we pay our respects to Elders past and present.

We lead through our purpose to *Reimagine Urban Life* and are guided by our values. We strive to be a force for good, with people at the centre of what we do. Modern slavery is inclusively considered as part of the broader human rights spectrum, and we aim to ensure the preventative measures we take are integrated into our operations and supply chain.

FY21 was a dynamic year for Mirvac, with the continued management of our COVID-19 response, an organisational restructure and the continued implementation of our business process transformation project. FY21 also saw the first reporting cycle of the Modern Slavery Act, which offered Mirvac a learning opportunity to understand our responsibilities and the Act's requirements. We leveraged our stakeholder network to collaborate and learn lessons within our organisation, across our joint venture partnerships, with our business peers, across sectors (including civil society groups), with our suppliers, and with government. We are pleased to take an approach of continuous learning and sharing on this important topic, and value the inputs we receive from our stakeholders.

We are proud of the progressive human rights policies we have in place, including our gender equality focus and our inclusion and diversity policies, and in 2021 we published our first annual Human Rights Commitment. Modern Slavery is an intolerable human rights violation, and we acknowledge the need to maintain our diligence around understanding how we contribute to modern slavery risk in our constantly evolving operating environment. We have focused on establishing a strong governance framework to manage those risks and ensure there is clear accountability. All this must be underpinned by capability building and collaboration. To ensure our iterative and risk-based approach is effective, we conducted an internal audit supported by KPMG, to identify improvement opportunities in our approach to the mitigation of modern slavery.

This statement offers a deeper view of our operations, our governance framework, and our policies, and demonstrates our efforts in the space of remediation through supporting the creation of an employment pathway. We are an active collaborator and continue to foster partnerships with the intention of creating positive change in this space. We are just at the beginning of our journey, and I look forward to reporting openly and transparently about our progress along the way. We welcome feedback from our stakeholders on this statement.

Regards,

**Susan Lloyd-Hurwitz**  
CEO & Managing Director

*Susan Lloyd-Hurwitz*

**ABOUT THIS REPORT:** This is a joint statement to cover Mirvac Limited (ABN: 92 003 280 699) which includes Mirvac Property Trust and other entities over which Mirvac Limited has control for accounting purposes during year ending 30 June 2021 (FY21) (together for the report, references to 'Mirvac', 'Group', 'we', 'us' and 'our' refer to Mirvac Limited and its controlled entities as a whole). This Modern Slavery Statement has been published in accordance with the Modern Slavery Act 2018 (Cth) (Act). This is Mirvac's FY21 Modern Slavery Statement and references in this report to a 'year' relate to the financial year ended 30 June 2021. Information contained in this statement is correct as at 30 June 2021 unless otherwise noted. This statement has been approved by the boards of Mirvac Limited and Mirvac Funds Limited (ABN 70 002 561 640) as responsible entity of Mirvac Property Trust.

**CONSULTATION WITH ENTITIES:** Mirvac's divisions have been part of a consultation process to address the Group's response to modern slavery through Mirvac's Anti-Slavery Committee (ASC). This document was prepared by Mirvac's Anti-Slavery Committee (ASC), which includes senior managers from across Office and Industrial, Retail, Residential, Design, Marketing & Sales, Construction and Group functions, including HSE, HR, Risk, Procurement and Sustainability who are tasked with representing their divisions and areas of expertise. Mirvac's controlled entities sit within these divisions and operate to support the activities of each division and the Group collectively. When preparing this document, senior managers were required to consult with their relevant business units, including where such business units are responsible for controlled entities. In addition to this, Directors of the controlled entities were consulted in the preparation and reviewed and approved the publishing of this statement. A complete list of the Group's controlled entities can be found in section 12 of [Mirvac's FY21 Annual Report](#) on page 134-137.



# Operations and Activities

## ABOUT MIRVAC

Mirvac is an ASX top 50 property group with an ambition to create and curate places and experiences that enrich the lives of millions of Australians. We own and manage assets across the office, industrial, retail and build to rent sectors in our investment portfolio and create award-winning urban precincts that set new benchmarks in sustainability and design excellence. Our integrated approach gives us a competitive advantage across the lifecycle of a project. From site acquisition, urban planning and design, through to development and construction, leasing, sales and marketing, property management and long-term ownership, we exercise control over the entire value chain. Our diversified model also ensures stable income and growth, as well as a balance of passive and active capital, enabling us to respond to fluctuations in the property cycle.

## OUR PURPOSE

At Mirvac, we are united behind a single purpose, to *Reimagine Urban Life*. This means we are committed to making a positive contribution to the environment and a meaningful difference to people's lives. We aim to be a force for good, and we do this by using the most important levers in our control to buy, work, give, and learn with intent. As one of Australia's largest companies, we believe we have a responsibility to help create a better future for everyone. That's why we aspire to think differently and apply our skills, experience, and innovation capability to solve many of the problems faced within our cities, both today and in the future. Aligned to our purpose and guiding us in all we do are our values.

## OUR VALUES ARE THE BUILDING BLOCKS OF OUR CULTURE

### WE PUT PEOPLE FIRST

We listen to, understand, and respond to our stakeholders and treat all people with respect. We have robust processes, systems, training, and governance in place to mitigate modern slavery in our supply chain because we recognise that we need to remain focused on the victims, or potential victims, of modern slavery.

### WE ARE PASSIONATE ABOUT QUALITY AND LEGACY

We strive to deliver enduring quality which leaves a positive legacy in each area of our operations.

### WE COLLABORATE

We build trusted relationships and leverage the power of working as one team within our business, and an example of this is our Anti-Slavery Committee. We engage proactively with our external partners and understand that collaboration is imperative to identify potential modern slavery situations due to the magnitude and hidden nature of the issue.

### WE ARE CURIOUS AND BOLD

We ask what's possible and we are ambitious in our actions. We challenge assumptions and embrace disruption. We explore trends and look at how we can make life better for people. We aim to take a leadership position in responsible procurement and in educating our suppliers to eliminate modern slavery from our supply chain.

### HOW WE WORK MATTERS

How we work is our differentiator. We are leaders in safety, sustainability, innovation, inclusion, and learning. We are committed to ensuring that our systems, procedures, and practices reflect a high standard of corporate governance, and we work within this framework to prioritise the safety of our employees and communities, including those in our supply chain who may be exposed to human rights risks.

### WE ARE GENUINE AND DO THE RIGHT THING

Mirvac has a genuine desire to do the right thing and be a force for good, and this includes doing all that we can to help to eradicate modern slavery. Our culture supports our people to be proactive and deliver on their commitments, which is evident through the voluntary internal audit we undertook to review our outcomes in this space.



# Operations and Activities *continued*

## OUR COMMITMENT

Mirvac remains committed to respecting and promoting the human rights of our employees, customers, suppliers, and business partners, consistent with the International Bill of Rights (which includes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights) and the United Nations Guiding Principles on Business and Human Rights.

We are a signatory to the UN Global Compact, and we participate actively in the Australian network. An overview of the Modern Slavery Community of Practice is outlined on page 17.

We are mindful of the UN Sustainable Development Goals (SDGs) and we report our progress on the SDGs relevant to Mirvac's sustainability strategy, *This Changes Everything*, through our integrated annual reporting. Mirvac's sustainability reporting is prepared in accordance with the Global Reporting Initiative Standards:

### THE SDGS MOST RELEVANT TO THIS STATEMENT ARE:



We recognise modern slavery as conduct involving the use of any form of slavery and situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Modern slavery can include human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, and the worst forms of child labour.

At Mirvac, modern slavery is inclusively considered as part of the broader human rights spectrum. This is further explored through our policy framework on page 11.

## FY21 IN REVIEW

COVID-19 continued to impact the world throughout FY21, and research has shown that the pandemic has contributed to the problem of modern slavery. While modern slavery risks increased, attention on the issue has been diverted, potentially leaving companies with more exposure to instances of modern slavery. There has been a reduction of modern slavery reporting globally, largely due to NGOs having decreased mobility across countries, and news outlets focusing their attention on the pandemic. Throughout this time, Mirvac has continued to monitor risks and enact due diligence processes aimed at mitigating the presence of modern slavery.



Drop in volume of modern slavery-related news articles globally in January to June 2020, compared to similar time period in June 2019



Estimated drop in number of NGO-reported modern slavery cases in Traffik Analysis Hub<sup>2</sup> globally in January to June 2020, compared to similar time period in 2019

*“Having been allowed to step out of the public spotlight as a result of COVID-19, modern slavery has continued to flourish in the dark. It created a fresh grey market opportunity for human traffickers to exploit, and new risks for businesses.”*

**Andrew Wallis**  
OBE, CEO, Unseen UK

We recognise that some of our suppliers are more vulnerable than others, and that procurement practices can be a contributing factor in the encouragement of modern slavery in business operations and supply chains. To support smaller suppliers in FY21, Mirvac reduced payment terms to five days for these suppliers.

The pandemic also proved to be a particularly challenging time for our tenants, and we worked closely with them to provide regular updates and simplify government communications about available assistance. This included government mandated assistance in the form of rental relief and rent deferral, and we provided additional assistance to businesses that were hit particularly hard, in some instances waiving 100 per cent of the rent during impacted periods. Similar to the above, we recognise that our business practices can contribute to the arising of modern slavery practices. These efforts helped to improve continuity for those tenants, enabling them to maintain focus on operations and risk mitigation during the significant disruption.

Over the past 12 months, Mirvac has taken the opportunity to strengthen its capabilities. This included a significant restructure, which consolidated our Office, Industrial, Retail and Build to Rent portfolios into a single platform, the Integrated Investment Portfolio; along with the continued rollout of an important business transformation project.

These changes provided an opportunity to strengthen Mirvac's capabilities, streamline its processes, and create new and expanded roles for key talent. While these changes took place, we maintained our focus on our due diligence processes. This included undertaking an internal audit (see page 16) and reviewing Mirvac's Anti-Slavery Committee (ASC or the Committee) to ensure representation on the committee reflected the new structure.



1. Dow Jones/Edelman-revealing risks of modern slavery.  
2. Global data hub to facilitate the sharing of information about human trafficking across all industries and sectors.

# Operations and Activities *continued*

## OUR ORGANISATIONAL STRUCTURE



## OUR ASSETS AND RESIDENTIAL PROJECTS

Our people underpin our ability to deliver safe, economic, and sustainable outcomes that generate value for our customers, communities, securityholders, and our planet. We have approximately 1,400 employees and operate primarily in Australia's four key cities of Sydney, Melbourne, Brisbane and Perth. The map below outlines employee distribution as well as asset and project distribution within our divisions across the country.

TOTAL NO. OF EMPLOYEES<sup>3</sup>

1,416

39 casual employees

14 employees on a visa\*

123 employees on fixed term contracts

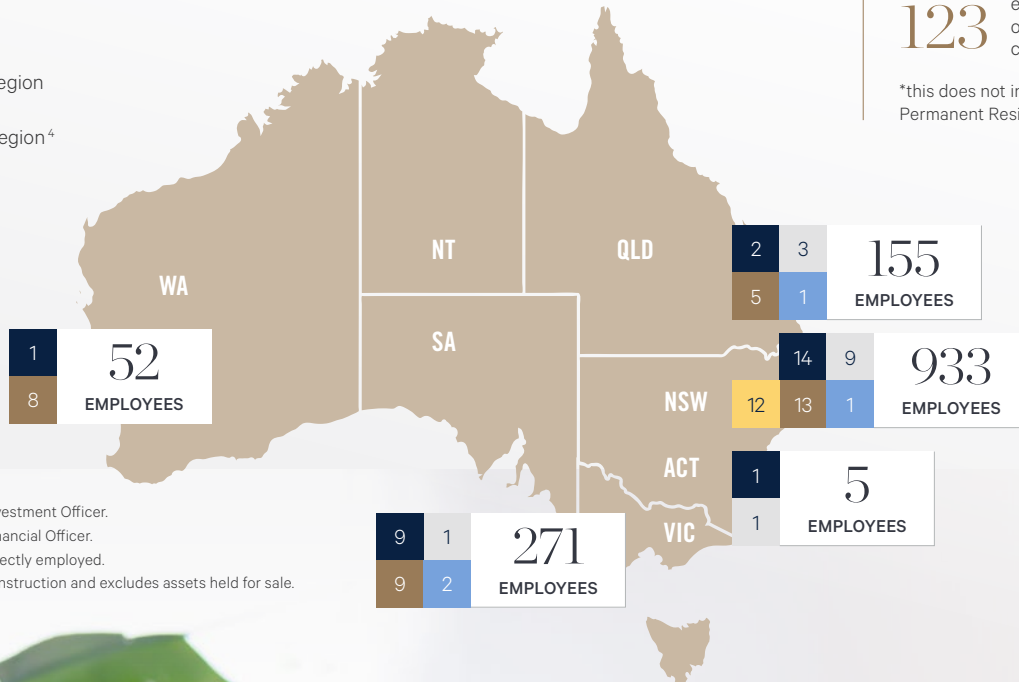
\*this does not include Permanent Residency visas

### LEGEND

Employees by Region

Assets / Projects by Region<sup>4</sup>

- Office
- Retail
- Industrial
- Residential
- Build to Rent



1. Managed by the Chief Investment Officer.
2. Managed by the Chief Financial Officer.
3. Number of employees directly employed.
4. Includes assets under construction and excludes assets held for sale.





## Operations and Activities *continued*

### SUPPLY CHAIN OVERVIEW

In FY21, Mirvac spent \$1.5 billion with approximately 4,500 suppliers<sup>1</sup>.

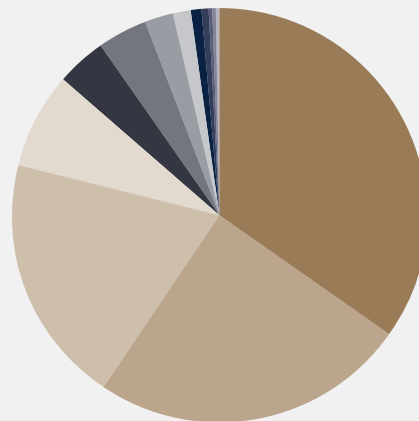
- > **Corporate** – 450 suppliers provided services, such as professional services, information technology and communications, human resources, marketing, office supplies, travel and insurance;
- > **Office & Industrial** – 2,000 suppliers across building maintenance, mechanical operations, security, plumbing, electrical works, fire safety, and cleaning services, as well as temporary personnel services. Suppliers also provided services across civil works and infrastructure, floor finishes, joinery and carpentry, form work, structural steel, concrete, metal work, equipment hire, scaffolding and landscaping (these goods and services form part of Retail, Build to Rent and Residential below);
- > **Retail** – 800 suppliers across asset management services such as cleaning, civil works, parking management, and security, along with those who help us deliver our upgrades and maintenance works;
- > **Build to Rent** – 200 suppliers across engineering, architecture, civil works, building materials, photography, legal and managing consultants; and
- > **Residential** – over 2,300 suppliers used to deliver 500 apartments and 2000 masterplanned communities' land lots in FY21. This included 700 suppliers in the operational and sales and marketing teams.

In FY21, 99.7 per cent of Mirvac's direct procurement spend was with Australian entities. We recognise that these suppliers may procure materials from outside of Australia, as indicated in the snapshot of the PCA supplier self assessment statistics on page 13. Of the overseas suppliers we sourced directly from, China, Japan, Hong Kong, Philippines and Thailand represented the majority of the spend. China, Philippines and Thailand have been identified as higher risk countries<sup>2</sup>. The suppliers from China and Thailand are joinery and structural steel manufacturers and underwent a rigorous due diligence process, including supplier audits, which we outlined in the [FY20 Modern Slavery Statement](#) (FY20 Statement).

A detailed due diligence process was also carried out in our decision to outsource an element of our financial support function to the Philippines. Supplier obligations are captured in the contract with our outsourcing provider relating to appropriate workspace, accommodation and pay. Employees across multiple levels of Mirvac visit the suppliers' offices regularly throughout the year.



### SPEND PER CATEGORY



- Subcontracted services 35%
- Materials supply / supply & install 24.7%
- Professional services 19%
- Head Contractor – external 7.6%
- Marketing 3.9%
- Premises 3.8%
- Equipment purchase & rental 2.3%
- Information technology and communications 1.4%
- Human resources 0.8%
- Office supplies, PPE & postage 0.4%
- Business travel & expenses 0.3%
- Insurance 0.2%
- Subscriptions 0.15%



1. Some suppliers are used across multiple divisions and are counted more than once.

2. <https://www.globallslaveryindex.org/>



# Understanding our Modern Slavery Risks

*At Mirvac, we recognise there is a need to review our modern slavery risk profile regularly so that we can continue to identify new or emerging areas of risk.*

No sector or country is immune from modern slavery, and we understand that entities operating in the Australian property sector may be exposed to a range of modern slavery risks through their operations and supply chains. Globally, it is estimated that 18 per cent of those in forced labour work in the construction industry and another 22 per cent within manufacturing, forestry, mining and quarrying, all of which supply raw materials and components for construction<sup>1</sup>. Australia's construction industry is also considered higher risk because of the complexity of its supply chains and links to the Asia Pacific region, which is reported to have 66 per cent of the world's forced labour.

We assess potential modern slavery risks in our operations and supply chains in a range of ways, which includes considering information from external sources such as the [Social Hotspot Database](#), literature evidence, spend-based risk, and our high exposure spending categories.

 **18%**  
of people in forced labour work in the construction industry

 **22%**  
of people in forced labour work within manufacturing, forestry, mining and quarrying

## MODERN SLAVERY RISKS IN OUR OPERATIONS

We consider that modern slavery risks in our direct operations are comparatively low. Our workforce is located in Australia, primarily provides professional, office-based services, and is employed in accordance with Australian workplace law. We also have a comprehensive suite of policies in place to contribute to a safe and fair working environment for our workforce. Our employees have the right to join a union and 33 per cent of our workforce is employed under an Enterprise Bargaining Agreement.

We recognise that in some contexts, non-permanent workers and workers who hold visas may be more vulnerable to exploitation. As can be seen on page 4, the majority of our workforce are permanent employees. We engage a small number of fixed term contractors (9 per cent of workforce), casual (3 per cent of workforce) and visa holders (1 per cent of workforce) in primarily office based roles.

Our policy framework, outlined on page 11, details who our policies apply to, with the majority relevant to all Workplace Participants. Workplace Participants are defined as Mirvac employees, directors (both executive and non-executive), contractors, labour hire employees, suppliers, apprentices and work experience students.

Mirvac addresses any concerns relating to our tenants as they arise. Mirvac strives to work in partnership with our tenants, however, if concerns are ongoing after the matter has been raised, Mirvac can choose not to renew a tenancy agreement. This includes any matters relating to modern slavery. The inclusion of modern slavery clauses in tenancy agreements is currently under review, with our supply chain currently our primary focus.

## MODERN SLAVERY RISKS IN OUR SUPPLY CHAINS

In FY20, we created a snapshot of our highest levels of potential risk exposure based on geographic origins and spending categories in our supply chain. More information about this process is set out in our FY20 Statement.

We updated this risk snapshot in FY21 to reflect our activities and spend over the financial year. Our findings are summarised in the risk map on the next page, which highlights modern slavery risks at a material and subcontractor level. The horizontal axis looks at the inherent risks of the industry and product, while the vertical axis shows the likelihood (including geography) of the potential risk. The size of the bubble indicates our relative spend, while the colours indicate whether Mirvac's actions could cause, contribute to, or be directly linked to modern slavery in line with the UN Guiding Principles on Business and Human Rights (UNGPs). We explain on page 7 how we use the UNGPs to understand our potential involvement in modern slavery and inform our risk assessment process.

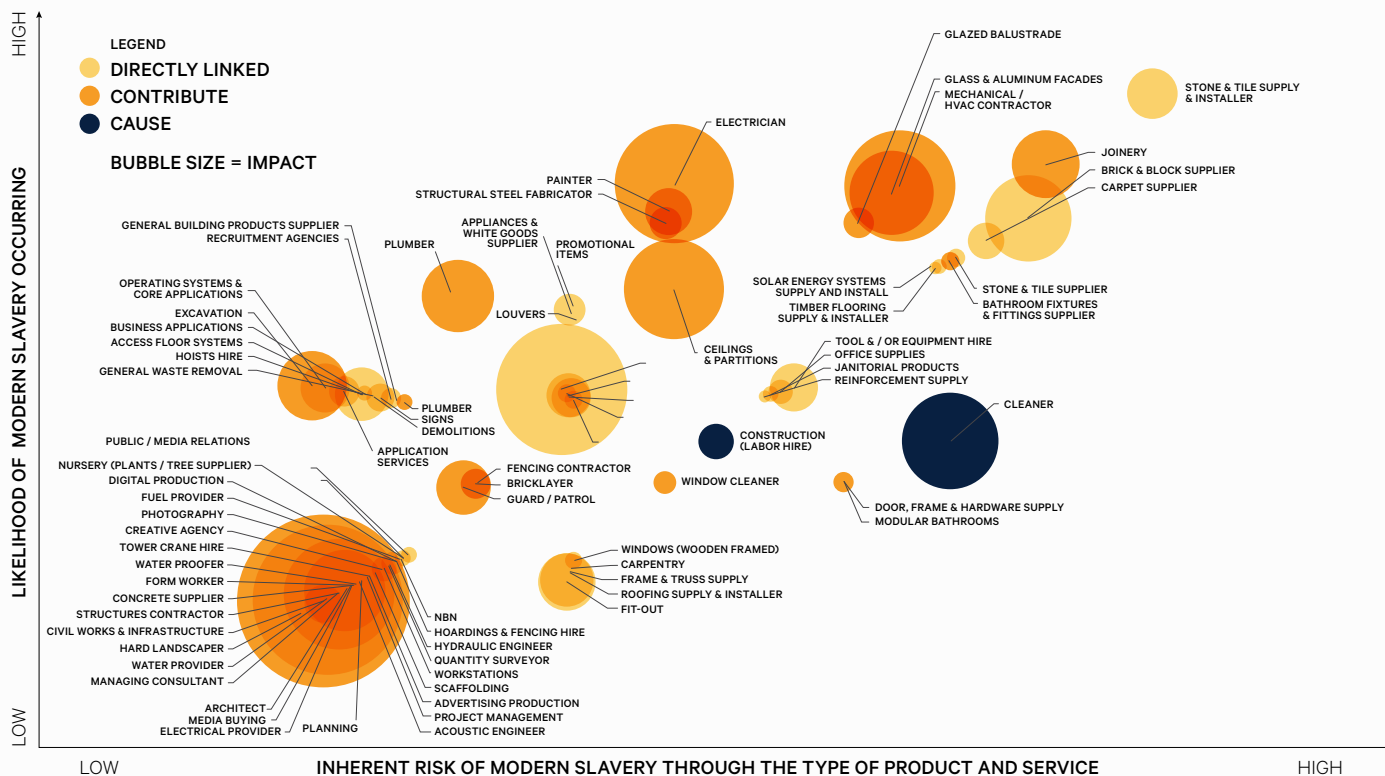
Importantly, our supply chain has remained relatively static from FY20, due to the nature of our development and procurement cycles. As a result, we consider our modern slavery risk profile remains broadly similar to last year. There has been a 25 per cent decline in the number of contracts we entered during FY21, and our direct overseas spend remains low (0.3 per cent). The majority of this overseas spend is with ongoing suppliers that have undergone a thorough due diligence process, including audits which were outlined in our FY20 Statement. No new overseas suppliers were engaged, and no high-risk areas were contracted to new suppliers (for example, cleaning or security providers) during the reporting period.

1. [https://www.ilo.org/wcmsp5/groups/public/@dgreports/@dcomm/documents/publication/wcms\\_575479.pdf](https://www.ilo.org/wcmsp5/groups/public/@dgreports/@dcomm/documents/publication/wcms_575479.pdf)  
ILO report on Global Estimates of Modern Slavery: Forced Labour and Forced Marriage



# Understanding our Modern Slavery Risks *continued*

## RISK MAP: RISK ANALYSIS SHOWING RELATIVE RISK OF MODERN SLAVERY OCCURRING



### HOW WE USE THE UN GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS TO UNDERSTAND OUR POTENTIAL INVOLVEMENT IN MODERN SLAVERY

*The UNGPs are the global standard for preventing and addressing adverse human rights impacts by businesses, such as modern slavery. As recommended by the Australian Government’s guidance about the Modern Slavery Act, we use the UNGPs to understand and explain how we may be at risk of involvement in modern slavery and to guide our risk management response.*

The UNGPs set out a three-part continuum of involvement that outlines how businesses can be involved in adverse human rights impacts, including modern slavery:

- > **CAUSE:** a business can cause an adverse human rights impact where its actions or omissions directly result in the impact occurring. For example, a construction company could cause modern slavery by exploiting its workers.
- > **CONTRIBUTE:** a business can contribute to an adverse human rights impact where its actions or omissions substantially contribute to the impact occurring. This includes acts or omissions that may incentivise or facilitate the impact. For example, a cleaning company could contribute to modern slavery by placing unrealistic cost requirements or timeframes on its subcontractors, which could likely only be met using exploited labour.
- > **DIRECTLY LINKED:** a business can be directly linked to modern slavery where it is directly connected to modern slavery through the activities of another entity that it has a business relationship with, such as a sub-supplier. For example, a security company may purchase uniforms for its staff made by a supplier with textiles produced by a third supplier using modern slavery.

We use this continuum to understand how we may be at risk of involvement in modern slavery, as shown in our risk map below. Importantly, we also use this continuum to help us identify how we should respond to potential modern slavery risks, based on our involvement in the risk. For example, under the UNGPs Principle 19, a business that is at risk of contributing to modern slavery should take action to stop contributing to the risk, provide for or cooperate in remediating any impacts it identifies it has contributed to, and use its leverage to mitigate any remaining risk to the extent possible.

We also draw on other elements of the UNGPs to help shape our approach to assessing and managing modern slavery risks. For example, the UNGPs Principle 17 highlights the importance of ongoing risk assessment as part of human rights due diligence and explains businesses should focus on those areas of their business activities and relationships with the highest risk of adverse human rights impacts. The UNGPs Principle 24 also recommends that, where necessary, businesses prioritise responding to the risks of human rights impacts that are most severe (or where delayed response would make them irremediable).

## Understanding our Modern Slavery Risks *continued*

### COLLABORATIVE RISK ASSESSMENT

Our modern slavery risk assessment processes are also informed by our engagement with the Property Council of Australia (PCA). Through the PCA, we work collaboratively with industry peers to engage suppliers, including through the PCA supplier questionnaire. Due to the number of shared suppliers across the property sector, this collaborative approach to risk assessment helps us to maximise our impact and facilitates a consistent approach across the sector to supplier risk assessments.

We incorporate data from the PCA supplier questionnaires into our risk assessment processes to help us understand risks associated with specific suppliers. More information about our continued collaboration with the PCA, and the process by which data from the questionnaires has been verified, is outlined on page 13.

### LOOKING FORWARD

Although our supply chain remained relatively static over the reporting period, we understand that our modern slavery risk profile will continue to evolve over time in both our operations and supply chain. For example, in FY22 we will undertake procurements for several major projects and will be tendering for cleaning and security services at more than 50 of our commercial assets. This procurement activity will provide an opportunity for us to build meaningful partnerships with suppliers to manage modern slavery risks. In addition, it will provide an opportunity to incorporate feedback on our FY20 cleaning traceability study and incorporate employee interviews in our due diligence process.

We will continue to monitor new and emerging issues to understand how they may impact our modern slavery risk profile. For example, Mirvac spent \$800,000 on the supply and install of solar energy systems in FY21, and we are aware of increasing evidence relating to links between solar-grade polysilicon used in solar panels and modern slavery. In FY22, we look forward to working with the University of Melbourne on a project focused on improving modern slavery risk management and reporting in Australia's construction industry, which will enable us to further refine our understanding of modern slavery risks. A deep dive into solar-grade polysilicon will be included in this project and that, along with industry collaboration with the PCA, will input into how we address this issue.

We have also reviewed the findings of separate analyses of modern slavery statements undertaken by the Australian Council of Superannuation Investors (ACSI Report) and the Monash Centre for Financial Studies (Monash Report), including in relation to disclosures of modern slavery risks and incidents. For example, the ACSI report highlighted the need for increased detail in modern slavery risk disclosures and the Monash Report recorded four high risk modern slavery incidents in the real estate sector. This is a reminder for us in the property sector that constant vigilance is required.







# Assessing and Addressing Risks

Consistent with the expectations for human rights due diligence set out in the UNGPs, our modern slavery risk management approach includes the following components:

- > clear governance structures, including a cross-functional Anti-Slavery Committee, to integrate and coordinate our actions to manage modern slavery risks across our business;
- > a comprehensive policy framework to support a safe and fair working environment for our workers and our suppliers;
- > action to assess potential modern slavery risks, which includes collaboration with industry peers;
- > engagement with suppliers through our due diligence process;
- > training for our workforce; and
- > a framework to enable the identification and remediation of potential modern slavery incidents.

This section outlines the steps we have taken over the reporting period to progress our modern slavery response in these areas. We will continue to further refine and evolve our modern slavery risk management approach as we build our understanding of potential modern slavery risks in our operations and supply chains.



## What is Human Rights Due Diligence?

Under the UNGPs, the term 'human rights due diligence' refers to an ongoing management process to identify, prevent, mitigate and account for how an entity addresses actual and potential adverse human rights impacts in their operations and supply chains, including modern slavery.

## FY21 SNAPSHOT

In FY21, our focus was on continuing to implement and assess the effectiveness of the first wave of activity (identification of risks, building a governance framework and building capability), which we primarily attended to through an audit. We also focused on building our modern slavery intelligence and connectedness through our stakeholder network of both experts and other businesses learning more about the issue.

In our emerging second phase of the strategy, we expect that we will continue to refine our risk scanning capability, including a focus on areas we know are of concern. We will also have an increased focus on the operationalising of modern slavery due diligence processes, including activating key accountabilities through the refresh of key performance indicators (KPIs) and performance measures.



# Assessing and Addressing Risks *continued*

## GOVERNANCE

Mirvac established its cross-functional Anti-Slavery Committee in 2019 to oversee modern slavery risk management activities in the Group’s operations and its supply chain. The Committee is focused on strategy creation and execution, statement input and approvals, incident management and remediation.

The Committee reports into the Executive Leadership Team and is chaired by Mirvac’s Chief Financial Officer. To ensure our response to modern slavery is inclusive and comprehensive, members have been selected to represent their divisions, as well as provide subject matter expertise in their field.

The Committee includes representatives from Procurement, Construction, Sustainability, Risk and Audit, Health, Safety and Environment, HR, Retail, Legal, Finance, Design, Marketing and Sales, Technical Services and Operations.

We ensured alignment of the Committee to Mirvac’s new structure in FY21 by revising the membership. In FY22, the role of the ASC will become more clearly defined as we formalise our charter, and reclarify the purpose of the Committee and the roles and responsibilities of its members.

*“I am encouraged by the potential to make a difference in this space, we don’t have all the answers but it is important to make a start and ensure we share what we have learnt with others and seek to continue learning.”*

**Courtenay Smith**  
CFO, ASC Chair

## ASC GOVERNANCE FRAMEWORK





## Assessing and Addressing Risks *continued*

### OUR POLICY FRAMEWORK

We have a comprehensive policy framework to support our commitment to respect human rights, including the human right to freedom from modern slavery.

It is aimed at supporting a safe and fair working environment, as well as setting clear expectations for our workers and suppliers. Our key policies relevant to modern slavery are set out below. For more information on these, please visit the corporate governance section on our website at [www.mirvac.com/about/corporate-governance](http://www.mirvac.com/about/corporate-governance).

- > Mirvac's **Code of Conduct** articulates the standards of behaviour that Mirvac expects of all Workplace Participants. Any materially adverse conduct that is inconsistent with the values, the Code, or desired culture of the Group is reported to the Board. This includes any conduct where human rights violations, including modern slavery, have been identified. Training on the Code of Conduct is completed by all employees annually.
- > Our **Human Rights Commitment** describes the steps that Mirvac is taking to address human rights risks, such as those relating to modern slavery, across the organisation and global supply chain, and sets out our plans for future improvements. The future priorities outlined in the Commitment include increasing supplier awareness and engagement, and further investing in collaborative opportunities with peers and other stakeholders. Our first Commitment was published in February 2021. It has been shared with employees and is available on our Intranet and the Group's website. It will be reviewed annually.
- > Our **Risk Management Policy & Framework** outlines the processes we have in place to safeguard the Group in achieving its strategic and operational objectives. This framework demonstrates the systematic identification, assessment, management, monitoring and communication of all material risks associated with the Group's business operations. Modern slavery risks are assessed within this framework as outlined on page 16 in a description of our internal audit process. It is available on our Intranet and Group website, and is reviewed annually.
- > Mirvac's **Whistleblower Policy** is outlined in the Remediation Processes section on page 14. In FY21 some grievances were raised and resolved (unrelated to modern slavery) using the Whistleblower Hotline and our internal incident management procedures which has helped us to determine the processes' overall effectiveness.
- > Mirvac Group **Crisis and Incident Management Plan** is an internal document that assists in the management of incidents with a high severity level. It details the individuals that need to be involved in the process and guidelines for them to follow.
- > The **Group Procurement Policy** is outlined in the Vendor Journey on the next page and is available on the Group's Intranet.
- > The **Vendor Code of Conduct** is outlined in the Vendor Journey section on the next page, and is available on the Group website and Intranet.
- > Our **Conflicts of Interest and Related Party Transactions Policy** sets out guidance for Mirvac entities and employees to identify and manage conflicts of interest and related party transactions. If not addressed, conflicts of interest can undermine the integrity of our workplace and relationships with suppliers, which may increase our exposure to modern slavery risks. It is available on our Intranet and Group website. All Workplace Participants are trained annually on this policy and it is reviewed at least every two years.
- > Our **Health Safety Environment Policy** sets out the guiding principles and our commitment to protect and improve the health, safety and wellbeing of our employees, suppliers and communities and provide healthy, safe and productive places. We recognise that unsafe workplaces may be linked to an increased likelihood of modern slavery occurring, such as in our supply chain. Our vision is to pursue safety excellence and move beyond preventing harm and ill health to improve the overall wellbeing of our employees, suppliers, communities and the environment, including mental, social and psychological wellbeing. Training on our Health Safety Environment Policy is completed annually by all employees.
- > Our commitments to diversity, anti-discrimination, equal employment opportunity, as well as inclusion are outlined in our **Inclusion Policy**, which applies to our employees, service providers, contractors, and consultants. Inclusion represents acceptance and respect of the characteristics that make one individual different to another, noting that victims of modern slavery are often from vulnerable or minority communities. Training on the Inclusion Policy is undertaken as part of our employee induction process.
- > Mirvac's **Responsible Investment Policy** takes account of environmental, social and governance risks and opportunities in the investment decision making process. We are a signatory to the United Nations Principles for Responsible Investment.

More broadly, we also have a number of policies which demonstrate the robust nature of our corporate governance and our commitment to our people and respecting their human rights. These are:

- > Grievance Resolution Procedure
- > Fraud, Bribery and Corruption Policy
- > Recruitment and Selection Policy
- > Bullying Harassment Prevention Policy
- > Leave Policy
- > Shared Care Parental Leave Policy
- > Flexibility Policy
- > Privacy Policy
- > Remuneration Policy
- > Injury Management and Return to Work Policy
- > Managing Unacceptable Workplace Performance and Behaviour

*We acknowledge that women and children are considered vulnerable to modern slavery, with 71 per cent of those in modern slavery being female and 25 per cent being children<sup>1</sup>. At Mirvac, we ensure the foundations of how we operate incorporates basic human rights that address inequalities. In FY21, we maintained female representation above our gender targets, with 43 per cent of senior leadership roles held by women. Our efforts in this space have been recognised externally. Mirvac was awarded with the Employer of Choice for Gender Equality citation for the seventh consecutive year in FY21, and achieved a like-for-like gender pay gap of zero for the sixth year in a row. We were also ranked number two in the world (and number one in Asia Pacific) for gender equity by Equileap for the second year in a row.*

1. Global Slavery Index 2018.

# Assessing and Addressing Risks *continued*

## SUPPLIER ENGAGEMENT AND DUE DILIGENCE

We recognise that a key challenge in implementing our response to modern slavery is assessing and addressing risk in our supply chain, including where modern slavery risks may be present in our extended supply chains below our tier one suppliers.

We work to address this challenge by taking a robust approach to supplier engagement and due diligence based on strong internal procurement processes, while continuing to leverage collaboration with our industry peers through the PCA. We have also engaged Givvable, a company that tracks supplier sustainability, to assist in supplier analytics.

We value strong relationships with our key suppliers. This enables us to build trust and make progressive change together. Our aim is to ensure that all our suppliers respect human rights, and that they are committed to taking meaningful action to manage modern slavery risks.

## THE VENDOR JOURNEY

### PROCUREMENT POLICY AND GUIDELINES

The Group Procurement Policy outlines Mirvac's standards for all procurement activity and ensures consistent practices across the Group.

The Procurement Guidelines sit underneath the Policy. They inform business unit specific requirements in the procurement process and ensure compliance to the overarching Policy.

Combined, the Policy and Guidelines outline:

- > Mirvac's procurement philosophy, in which we support the Ten Principles of the United Nations Global Compact, including International Labour Organisations Conventions Responsible Sourcing requirements, as well as incorporating the assessment of potential modern slavery risks and the actions taken to assess and address this risk. We also prioritise collaboration with social enterprises and Indigenous businesses through our social procurement target to divert \$100m to the social sector by 2030, with over \$28m spent in this way since FY18;

- > Our vendor relationship management process, which outlines Mirvac's commitment to working with its supply chain to actively encourage:
  - innovation and development of products that meet our aspirations around minimising environmental and social impacts;
  - educating and learning from our supply chain on sustainability and innovation;
  - community benefits and social cohesion;
  - compliance with the Vendor Code of Conduct; and
  - collaboration to take steps to ensure that slavery and human trafficking are not taking place, and that processes are in place to ensure it is difficult for it to occur; and
- > areas such as payment of vendors, principles of procurement, compliance, and consequence management.

### VENDOR CODE OF CONDUCT

Mircac's Vendor Code of Conduct (VCoC) defines our commitment to, and our expectations of, our suppliers and the way we conduct business together. It is referenced in our contracts and on purchase orders.

The VCoC includes requirements relating to human rights, including modern slavery. It specifically requires our suppliers to comply with relevant labour and employment laws (including developing written labour policies), and to provide a formal complaints management process for their workers, the local communities in which they operate, and workers in their supply chain. Acknowledging that not all suppliers will have their own Whistleblower service, Mirvac's Whistleblower Hotline is available to all suppliers. The VCoC also requires our suppliers to not knowingly use modern slavery of any form.

In the creation of contracts, suppliers must agree to adopt the VCoC or have their own document supporting the same concepts as Mirvac. Our suppliers are required to share their modern slavery approach, or share Mirvac's, with their sub-contractors at the outset of contractual engagements. Our aim is to partner where possible with our suppliers however, if necessary, Mirvac can choose not to work, or cease work, with suppliers who do not act to meet these expectations.

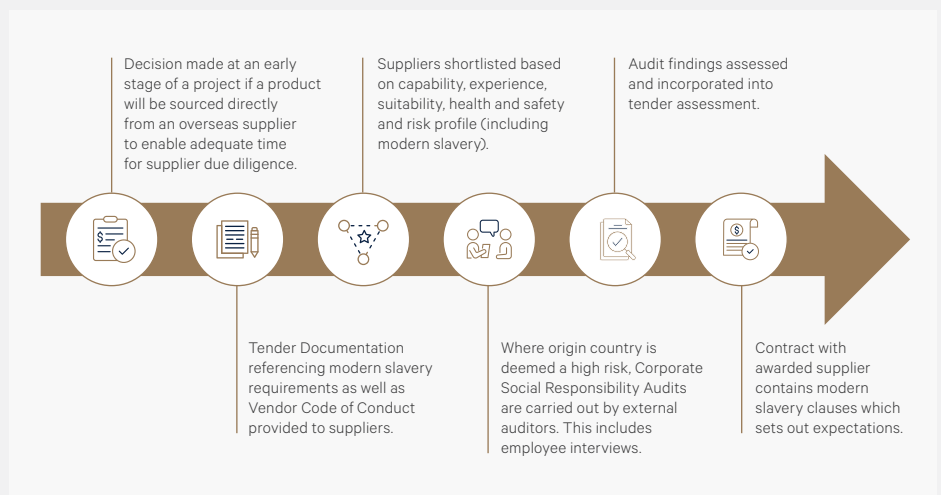
## DUE DILIGENCE TOOLS

Our supplier due diligence process, as guided by the policies and guidelines outlined above, includes a range of pre-qualifications checks, contractual arrangements, and ongoing monitoring as appropriate. The tools we use are dependent on category of spend, source country and other risk factors. This process can help us to identify potential areas of concern relating to suppliers, which could include issues relating to modern slavery.

Additional due diligence tools include:

- > Sustainability questionnaire
- > PCA supplier questionnaire
- > Vendor due diligence process
- > Sanctions checks
- > Audits
- > Site/factory visits
- > Training resources
- > Contracts
- > Ongoing supplier performance management

This example illustrates the onboarding journey when we procure directly from an offshore supplier for construction materials:





## Assessing and Addressing Risks *continued*

### PCA AND SUPPLIER ASSESSMENTS

Our due diligence activities in relation to modern slavery are also informed by our work to leverage opportunities for collaboration with our industry peers through the PCA.

Mirvac is a member of the PCA's Modern Slavery Working Group, which meets monthly to share updates and lessons learned. In addition, the group works to evolve the PCA online supplier platform that hosts the supplier self-assessment. The self-assessment enables suppliers to answer a set of questions, outlining their knowledge and the actions they are taking to assess and address human rights and modern slavery. The objective is that each supplier answers these questions just once, and results are then available to be shared across the Working Group, with the suppliers permission. Each Working Group member determines which suppliers they require to complete the assessment. The group is supported by Better Sydney for subject matter expertise and project management, and the Supply Chain Sustainability School for educational resources, with Informed 365 providing the technical expertise on the supplier platform and a follow up service to assist with supplier self-assessment completion.

The initial group of 15 founding partners (including Mirvac) has grown to 37 participating organisations (representing a total of over \$1.5 trillion in funds under management), with nearly 4,500 suppliers engaged, compared to 370 this time last year. Of these 4,500 suppliers, 41 per cent have completed or are completing the supplier self-assessment, and many are shared by multiple organisations. This includes our direct suppliers who represent 25 per cent of Mirvac's spend. This enables Mirvac and the PCA Working Group to identify higher risk areas where we can partner with our suppliers on finding solutions. Suppliers are also invited to enter information about actions they are taking to assess and address modern slavery.

Verification of responses to the assessment questions was deemed a critical part of the supplier engagement process. During 2021, the PCA Working Group worked with Informed 365 and Bureau Veritas to undertake independent, third-party reviews of the assessment responses provided by suppliers to evaluate their accuracy. This was done on a pilot scale in which Mirvac selected five suppliers from various categories to be included in the process (83 suppliers were selected by the Working Group in total, with 69 of those relevant to Mirvac). The objective was to provide suggestions for an improved question set, reduce confusion, clarify supplier responses, and highlight trends and patterns around modern slavery and related risks with the overall intent of providing further insights into continuous improvement pathways for suppliers.

Over 10 per cent of Mirvac's supplier spend was captured in the verification process, with checks being performed on 100 per cent of our lift providers, 73 per cent of our cleaners, 71 per cent of our mechanical/HVAC contractors, 42 per cent of our guards/patrols, and 40 per cent of our electricians. The results of the verification process are currently being assessed.

### SUPPLIER ANALYTICS

Of the 25 per cent of supplier spend represented on the platform, we have gained the following insights.

92%

of suppliers understand the basic facts around Modern Slavery, with a general awareness of where it may exist in Australian and international supply chains<sup>1</sup>.

92%

of suppliers do not manufacture products overseas or maintain foreign operations that contribute to their delivery<sup>1</sup>.

41%

of suppliers source via their supply chain manufactured products or services from overseas that contribute to their delivery<sup>1</sup>.

65%

of Mirvac suppliers have done some assessment of modern slavery risks in their operations and supply chains or plan to in the next twelve months.<sup>1</sup>

87%

of Mirvac's supplier organisations have a grievance mechanism or process in place (or plan to in the next twelve months) that provides an opportunity for employees, suppliers and the worker voice to be heard.<sup>1</sup>

70%

of Mirvac suppliers provide training to employees or suppliers around the topic of human rights and modern slavery or plan to in the next twelve months<sup>1</sup>

Additional statistics obtained through Givvable:

23%

of supplier spend in FY21 was with suppliers who have submitted a modern slavery statement.<sup>2</sup>

70%

of FY21 spend with suppliers was with companies that have a documented workers agreement with the Fair Work Commission.<sup>2</sup>

Mirvac will incorporate this data into our supplier engagement strategy and aim to increase the number of suppliers that complete the self-assessment to provide a more holistic view of our supply chain.

1. PCA Supplier Self-assessment.

2. Givvable, based on 100% of suppliers

## Assessing and Addressing Risks *continued*

### ENGAGEMENT AND TRAINING

Fundamental to Mirvac being a force for good in the area of modern slavery is making sure our employees understand what modern slavery is, where it can be found, how to manage the risk of it occurring in Mirvac's operations or supply chain, and what to do if they find it.

In FY20, modern slavery training was provided to the ASC by Better Sydney and The Supply Chain Sustainability School. The training covered topics such as the Modern Slavery Act, grievance mechanisms and remediation, and assessing effectiveness.

This training provided an important foundation for our response to modern slavery over FY21. In FY22, we will undertake further training on modern slavery for Committee members. With new information available following the first round of modern slavery statements submissions, including research reports from Monash University and ACSI, and with new members joining the ASC, undertaking this training in FY22 will help ensure the Committee continues to build its understanding of modern slavery. Workshops led by Better Sydney will occur in the first half of the financial year, and before and after surveys will be conducted to measure this training's effectiveness.

FY22 will also see the creation of a training strategy outlining awareness training and functional training for identified roles with a higher likelihood of encountering modern slavery.

Training in the two-step due diligence process, outlined in the FY20 Statement, was carried out in FY21 for selected employees in advance of tender activity in high-risk areas due to commence in FY22.

### REMEDIATION PROCESSES

Our Human Rights Commitment highlights the importance of ensuring that we take steps to position ourselves to identify and, where appropriate, remediate modern slavery incidents that may occur in our operations and supply chains. In line with the UNGPs, we recognise that we are responsible for providing or cooperating in remediation in situations where we have identified that we have caused or contributed to human rights harm, such as modern slavery. We also understand we may play a role in remediation where we identify we are directly linked to modern slavery or other harm.

Grievance mechanisms play a vital role in enabling the identification and remediation of potential modern slavery and other human rights-related issues. Mirvac has a Whistleblower program in place which allows the following persons (both in a current or previous capacity) to safely make a disclosure regarding potentially unethical, unlawful or improper practices or behaviours, which could include modern slavery:

- > officers (including directors) of Mirvac
- > employees of Mirvac
- > suppliers to Mirvac, and employees of these suppliers
- > individuals who are associates of Mirvac
- > a relative of any of the above people, or a dependent or one of the above people or their spouse, and/or
- > any persons prescribed from time to time as being able to make a disclosure by regulations under the Corporations Act 2001 (Cth) or the Taxation Administration Act 1953.

Under the Whistleblower Policy, disclosures can be made through a Whistleblower hotline, managed independently by YourCall. The Whistleblower Policy provides protection for individuals reporting matters in good faith, and an individual making a disclosure can choose to remain anonymous. Mirvac's Audit, Risk and Compliance Committee (ARCC) is responsible for overseeing the policy, and all material incidents and issues reported under the Whistleblower Policy are investigated by the Whistleblower Investigation Committee and are reported to the Board.

The Whistleblower Policy, together with the Whistleblower Hotline contact number, is available on Mirvac's Intranet as well as the Group's website [www.mirvac.com/about/corporate-governance](http://www.mirvac.com/about/corporate-governance). A training module for all employees outlines how Mirvac's Whistleblower protection regime works and how disclosures can be made within Mirvac. The overall effectiveness of the Whistleblower Policy and related programs is assessed every two years. No disclosures relating to modern slavery were made through the Whistleblower Hotline in FY21.

In FY22, we will explore ways to evolve our current grievance mechanism to help ensure it effectively allows for the reporting of issues relating to modern slavery, including potential barriers to access. We expect to take independent advice on this. We also look forward to working with the PCA working group on the area of grievance and remediation.





## Assessing and Addressing Risks *continued*

### REMEDICATION CASE STUDY

UNGP 22 states that 'Where business enterprises identify that they have caused or contributed to adverse impacts, they should provide for or cooperate in their remediation through legitimate processes.'

In demonstration of our commitment to support remediation and, in particular, the people harmed by modern slavery, in FY21 we participated in the creation of an employment pathway for a survivor of modern slavery to help build our understanding of how to support people who have experienced this abuse. Consent has been obtained from the participating parties to publish this case study.

Over the past year Mirvac has partnered with the Anti-Slavery Taskforce, Catholic Archdiocese of Sydney, to create an employment pathway for an individual impacted by modern slavery. Through its business partnerships, Mirvac supported training and employment opportunities for the individual so that they could obtain relevant qualifications, uniforms and equipment for site-based construction work. This led to casual and then full-time employment on multiple construction sites for the person, who said:

*"I always wanted a career in construction. I could never sit in an office - even though I know how to use a computer. Mirvac gave me the package I needed to get started and a job after training. It would have been impossible for me to do it on my own."*

While the COVID-19 pandemic disrupted this person's employment temporarily through site closures and reduced workloads overall, Mirvac will continue to work with the Anti-Slavery Taskforce to re-establish stable employment.

Jenny Stanger is Executive Manager at the Anti-Slavery Taskforce and has supported modern slavery survivors for over 20 years.

*"Survivors of modern slavery are like the rest of us - especially when it comes to work. They need decent, secure jobs that will allow them to sustain themselves and their families. Creating viable employment pathways for this very capable but disadvantaged group of job seekers demonstrates a big commitment on the part of Mirvac to fill the remedy gap and prevent future exploitation," she said.*

Our reflections on the experience.

- > The cross-sector collaboration was powerful. Connecting organisations that have the experience and skill set to assist people impacted by modern slavery with businesses where employment pathways are understood and can be made available can provide great opportunities.
- > Understanding and respecting survivors' goals and preferences is essential. In this instance, the individual had a very clear desire to work in a particular role which was the catalyst for the cross-group engagement.
- > Ongoing support is key. In this instance, the individual would have benefited from having a trusted mentor present in the work environment.
- > It is important that the individual is supported in gaining sufficient experience to allow them to independently source future employment.



*"It is very encouraging to see that individuals can be supported by organisations through opening up conversations on this topic and making a simple decision to work together. What I have also seen is that it is important to have people in place during the full lifecycle of individuals employment to continue the dialogue between all involved; to think of and support the individuals and help the organisations to manage their needs."*

Andrew Hogban,  
Mirvac lead on this collaboration

# Effectiveness

## ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

*Assessing the effectiveness of the actions we take to manage modern slavery risks is essential so that we can continually evolve and refine our processes and approach. We also acknowledge that assessing effectiveness is complex, and we will continue to explore opportunities to strengthen our approach in this area going forward.*

During the reporting period, we assessed the effectiveness of our actions through an internal audit and external benchmarking evaluation. These initiatives have provided us with a clear understanding of the steps we have taken to date, as well as highlighting areas for improvement.

### INTERNAL AUDIT

Our Internal Audit function brings a systematic and disciplined approach to evaluating and improving the effectiveness of risk management, controls, and governance processes. It also provides independent and objective assurance to the ARCC and Mirvac's senior management team that the controls we have in place are operating in an efficient and effective manner.

In FY21, our Internal Audit team reviewed how we were progressing against the plans we set out in our modern slavery strategy, which covered the following focus areas: governance model and risk approach; risk assessment; capability building; operational management; engagement and collaboration; and, monitoring, measuring and reporting. This audit process included interviews with key business functions and sought input from an external expert from KPMG. Conducting such a review ensures that there is visibility of modern slavery right across the business and helps us to identify potential gaps in our implementation of our strategy.

### EXTERNAL BENCHMARKING EVALUATION

KPMG were engaged as independent subject matter experts to benchmark Mirvac's modern slavery management controls against broader industry better practice and identify any areas for improvement. Managers from across the business were engaged in this process. The results of the benchmarking evaluation helped us to assess the effectiveness of our actions by enabling us to compare our current response with our peers' actions to manage modern slavery risks and identify where there may be opportunities to enhance our own response. For example, the benchmarking evaluation found that more detail could be provided on our capability building strategy.

### OUR PLAN FOR FURTHER IMPROVEMENT

A key learning from the internal audit and external benchmarking evaluation was the need to further clarify the role of the ASC and its members, as well as the next phase of our strategy. This will position us to more effectively implement our modern slavery response into the future. Additional resourcing has also been allocated to this work and a forward-looking strategic plan is currently in development, to complement the work already done.

We have also shared the findings of the internal audit and external benchmarking review with our senior leaders, and progress against the findings and recommendations will be closely monitored. We will look to refresh our current KPI's, listed on the right.

## KEY PERFORMANCE INDICATORS

### GOVERNANCE:

- > Entities' attendance to the ASC.
- > Active governance framework being delivered.
- > Number of contracts with modern slavery obligations included.
- > Internal audit of controls.
- > Continuous improvement of the governance model.

### CAPABILITY

- > Number of employees completing training, content of which has been created by modern slavery specialists.
- > Number of awareness-raising programs delivered within Mirvac and externally by Mirvac.
- > Policies and processes reviewed published and communicated.
- > Number of engagements with external experts and victim support groups.

### RISK

- > Number of cases brought to the ASC.
- > Number of cases remediated.
- > Risk assessment deployment.
- > Number of collaborations.

### OTHER EFFECTIVENESS MEASURES UNDERTAKEN IN FY21:

- > Through the PCA Working Group, Mirvac explored the effectiveness of the supplier questionnaire through a verification procedure conducted by Bureau Veritas. Further information about this verification process is outlined on page 13 of this statement.
- > Through the PCA, we contributed to developing a plan to engage external experts from civil society groups and research institutes to review the quality of the property sector's modern slavery statements. Their very comprehensive feedback will help to inform our strategy. Examples of feedback included ensuring the businesses approach maintains focus on the risk of harm to the person and ensuring the right people have been identified for training and that training is tailored to their needs.
- > We engaged with business and human rights advisory firm, Pillar Two, to provide feedback on our FY20 statement and identify improvement opportunities, as well as advising on our approach to selected elements of our FY21 modern slavery statement.





# Collaboration

Collaboration and knowledge sharing with our peers, suppliers, industry groups, and government is essential in managing our modern slavery risks, with a view to eradicate modern slavery globally. We recognise there is significant value in collaborating across multiple disciplines to ensure our approach to our anti-slavery activities is both robust and holistic. We recognise that we have an important role to play in positively influencing our collaboration partners.

We want to ensure that our approach has an orientation beyond compliance, bringing our suppliers with us on our journey of learning and understanding, while openly sharing what we've learnt for the benefit of others.

The table on the right highlights our network. Through these relationships, we have learnt what best practice is, shared insights, and identified common challenges and ways of tackling them together.

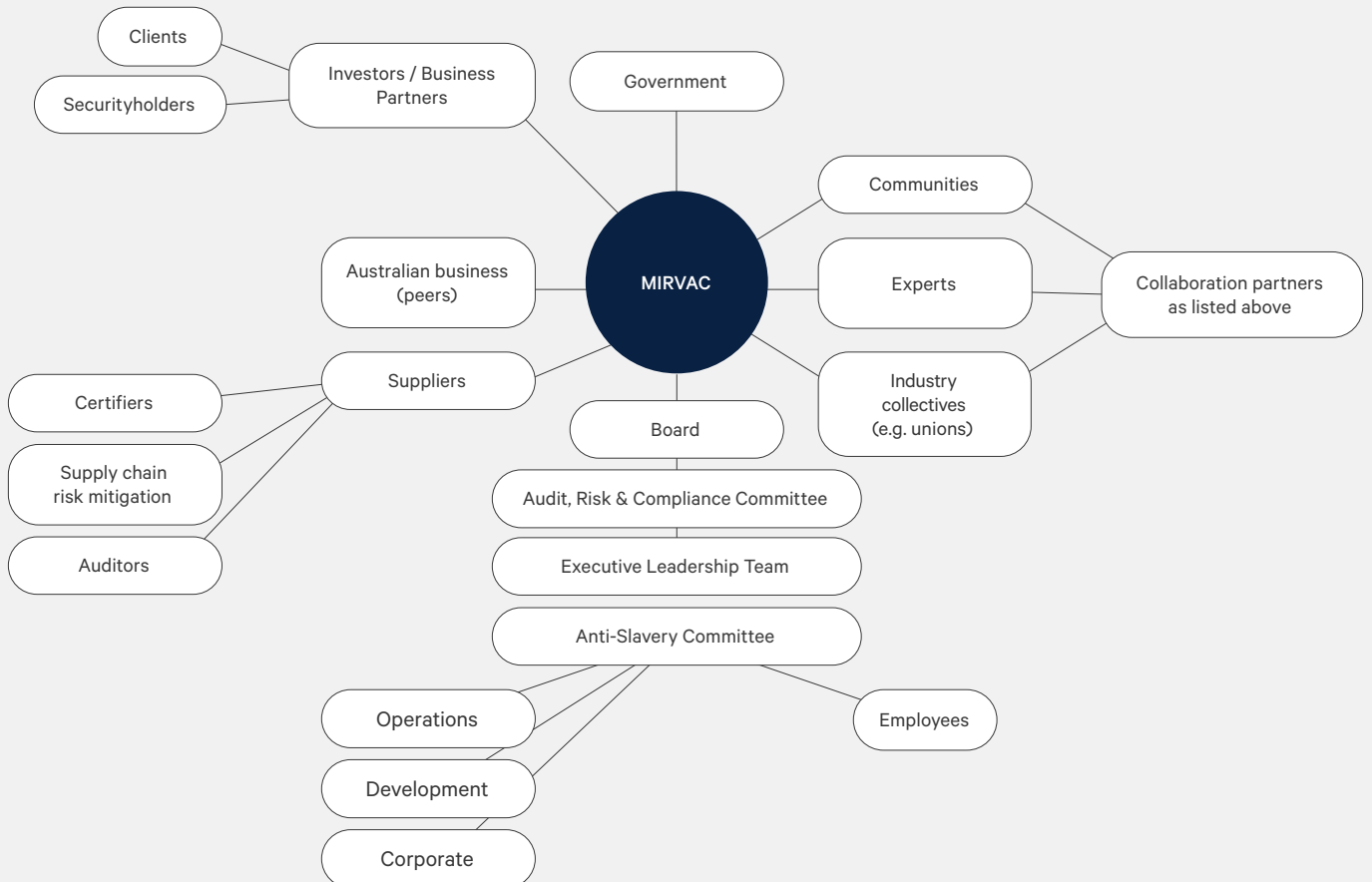
COLLABORATION PARTNERS	DESCRIPTION
<b>Government/ Australian Border Force</b> (ABF)	Mirvac attends webinar updates from the Australian Border Force (ABF) to obtain additional guidelines on the Modern Slavery Act (updates hosted by Informed 365 and MS CoP sporadically). Through the PCA, we also supported the enacting of the NSW Modern Slavery Act 2018 through a letter to the NSW Premier.
<b>Property Council of Australia</b> (PCA) (Industry Peers)	The PCA's Modern Slavery Working Group provides a forum for industry collaboration. The group explores modern slavery topics most relevant to the property industry, shares learnings, and identifies opportunities for further collaboration.
<b>Better Sydney</b> (Advisors, Expertise)	Better Sydney chair the PCA's Working Group, providing expertise and keeping the group well-informed on developments in action against modern slavery. Separately, Better Sydney also provides trusted professional advice to Mirvac on our modern slavery strategy.
<b>Informed 365</b> (Technology providers)	Informed 365 are the providers of the Supplier Questionnaire Platform and work in partnership with the PCA to evolve the platform. Mirvac attends webinars on modern slavery, hosted by Informed 365, which feature a cross-section of presenters (businesses, ABF, and consultants).
<b>Modern Slavery Community of Practice</b> (MSCoP) (Broader Business Peers)	Mirvac is one of approximately 40 participants in the MSCoP and has taken part in a number of their workshops throughout the year. These workshops provide an opportunity for Mirvac to hear from the ABF, investors, community organisations, and other members. The MSCoP also enables businesses from across different sectors to work together to respond to modern slavery risks and the associated mandatory reporting requirement under the Australian Modern Slavery Act.
<b>Supply Chain Sustainability School</b> (Resources and Training)	Mirvac are founding members of the Supply Chain Sustainability School and share its free resources, such as training, widely.
<b>Pillar Two</b> (Advisors, Expertise)	Pillar Two is an advisory firm helping businesses to take an integrated and practical approach to managing human rights risks. Pillar Two has advised Mirvac on selected elements of our modern slavery reporting.
<b>Givvable</b> (Analytics)	Givvable are the providers of a platform that tracks sustainability credentials.
<b>Australian Catholic Anti-Slavery Network</b> (ACAN) (Civil Society)	Collaboration with ACAN is outlined in our remediation case study on page 15.
<b>Be Slavery Free</b> (Civil Society)	Be Slavery Free introduces practices that eliminate modern slavery in business, while educating consumers on ethical procurement and creates networks for civil society. Mirvac participates in their webinars.
<b>Antislavery Australia</b> (ASA) (Victim Legal aid/Support)	ASA provide legal and migration services to people who have experienced or are at risk of modern slavery. They also provide a national advice hotline. Mirvac attended their webinars which influenced strategy, processes and risk assessing.
<b>KPMG</b>	KPMG provided support in our internal audit as outlined on page 16.
<b>Suppliers</b>	Through the Vendor Journey that is outlined on page 12, there are a number of touchpoints with our suppliers relating to modern slavery. We will continue to evolve our partnerships with suppliers in this space.



# Collaboration *continued*



## STAKEHOLDER MAP FOR FY21



# Next steps

*As our knowledge on human rights issues, including modern slavery grows, so does our commitment to continuous improvement. We know this will be essential to ensure the mitigation and eventual eradication of modern slavery.*

Below is a snapshot of some of the FY22 activities we have planned, some of which are already underway.

## GOVERNANCE:

We will be refreshing the ASC Charter, which will clearly articulate the purpose, code of conduct, and roles and responsibilities of the committee and its members. One of the ASC obligations will be to refresh the strategy and assign clear accountability to members through measurable KPI's.

## RISK:

We are committed to applying the learnings from the cleaning traceability study we undertook in FY20 to our upcoming cleaning tender for more than 50 of our commercial assets to ensure robust due diligence is incorporated into the procurement process. We also look forward to collaborating with the University of Melbourne on their study on common high-risk areas in construction supply chains, with the view to incorporate their recommendations on improved due diligence. We're also looking to expand our current supplier engagement to take more of a partnership approach, as part of our risk management process.

## CAPABILITY:

We have a goal to create an internal training strategy to address awareness and functional training across Mirvac, along with a commitment to educate the ASC to maintain and update their understanding of the modern slavery landscape as it evolves. This will equip the Committee to be Mirvac's compass on arising matters, supported by external expertise as required.

## GRIEVANCE AND REMEDIATION:

We will continue to explore the area of grievance and remediation in more depth. This is an area of future growth for business, Government and civil society and we look forward to collaborating to find better solutions.

## COLLABORATION:

Collaboration underpins our approach to the mitigation of modern slavery. We are committed to participating in various groups, attending workshops/webinars, and keeping abreast of new research. We recognise that managing modern slavery risk is not a solo journey, and we look forward to a rich exchange of learnings and ideas over the coming year with our valued partners, and we welcome the opportunity to form new partnerships.

*“Modern slavery is one of the biggest human rights challenges of our time. With a review of the Australian Modern Slavery Act due in 2022, it will be a time for business, civil society and labour organisations to take stock of what the Act has achieved to date and what we can recommend collectively to meet SDG 8.7 on eradicating forced labour, modern slavery and human trafficking.”*

## Kylie Porter

Executive Director,  
UN Global Compact Network Australia

