

**Hassell**

**MODERN SLAVERY  
AND HUMAN  
TRAFFICKING  
STATEMENT**







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## About this statement

Hassell's FY2023 Modern Slavery and Human Trafficking Statement has been prepared in accordance with the reporting requirements of Australia's Modern Slavery Act 2018 (Cth), the United Kingdom's Modern Slavery Act 2015 (UK), and associated guidelines, namely Australia's Guidance for Reporting Entities and the UK's Transparency in Supply Chains etc. A practical guide.

Accordingly, this Statement describes:

- Hassell's company structure, operations, and supply chains
- Our policies in relation to slavery and human trafficking
- Potential risks of modern slavery across our operations and supply chains
- Actions taken to assess and address risks of modern slavery across our operations and supply chains, including due diligence
- Training and awareness activities
- How we assess the effectiveness of our actions
- Our consultation processes with the controlled entities

This Statement is submitted as a Joint Statement pursuant to section 14 of the Modern Slavery Act 2018 (Cth), for our two reporting entities Hassell Australia Limited (ABN 34 128 785 080) and Hassell Ltd (ABN 24 007 711 435).

This statement also applies to all other entities within the Hassell group of companies, within Australia and overseas, trading as Hassell. This is appropriate as all Hassell entities have adopted the policies, procedures, and processes pertaining to modern slavery as outlined in this statement, including all subsidiary entities. References to 'Hassell', 'we', 'us' and 'our' refer to Hassell and its owned and controlled entities as a whole. Further information on our company structure is provided on page 3 of this statement.

Information contained in this statement is correct as at 30 June 2023 unless otherwise noted.

Compliant with the requirements as set out in section 54 of the Modern Slavery Act 2015 (UK) and section 14 of the Modern Slavery Act 2018 (Cth), the Hassell Modern Slavery and Human Trafficking Statement for the year ended 30 June 2023 has been considered and approved by the Board of Management of the Hassell group and signed by its Managing Director.

# A MESSAGE FROM OUR MANAGING DIRECTOR



At Hassell, we recognise we live in a rapidly changing world where inequality, climate change, urbanisation, and digitisation present new challenges and opportunities alongside evolving risks, issues, and challenges. One of these critical issues is the growing prevalence of modern slavery globally. With more people living in conditions of slavery than at any time in history, it is imperative that we play our part in its eradication.

‘Modern slavery’ describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. This term encompasses eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

We’re opposed to slavery in all its forms, and we acknowledge our responsibility to combat modern slavery and human trafficking. We’re committed to ensuring that such practices have no place within our organisation or our supply chains and

to the need to contribute to ongoing global efforts to alleviate modern slavery in the built environment. Our response to modern slavery is closely tied to our purpose and our values, which guide how we operate ethically and with integrity in all aspects of our business.

This is our fourth Modern Slavery and Human Trafficking Statement and it reflects the progress we have made during FY2023. It has been a pivotal year for Hassell as we continued to progress our sustainability ambition, including the launch of our revised Sustainability Framework and setting our 2030 targets.

In improving our modern slavery risk and reporting program, this year we have refreshed our Modern Slavery Working Group, performed a detailed assessment of salient modern slavery risks, and increased our internal capability and resourcing on human rights. We have also commenced development of our sustainable procurement strategy, strengthened our modern slavery training and awareness activities, and have designed a new platform for grievance reporting across our practice.

While we are proud of our progress to date, we know there is more work to do. Over the next year, we will continue to enhance our modern slavery risk and reporting program via a number of operational and strategic changes.

In FY2024 we will implement our sustainable procurement strategy, roll out our grievance reporting platform to all staff, and further improve our training and awareness. We will continue to engage with industry bodies, collaborative partnerships, and subject matter experts on modern slavery and human rights as we seek to better measure the effectiveness of our actions and expand our current approach to an holistic human rights program.

Liz Westgarth  
Managing Director

# ABOUT HASSELL, OUR STRUCTURE, OPERATIONS & SUPPLY CHAINS

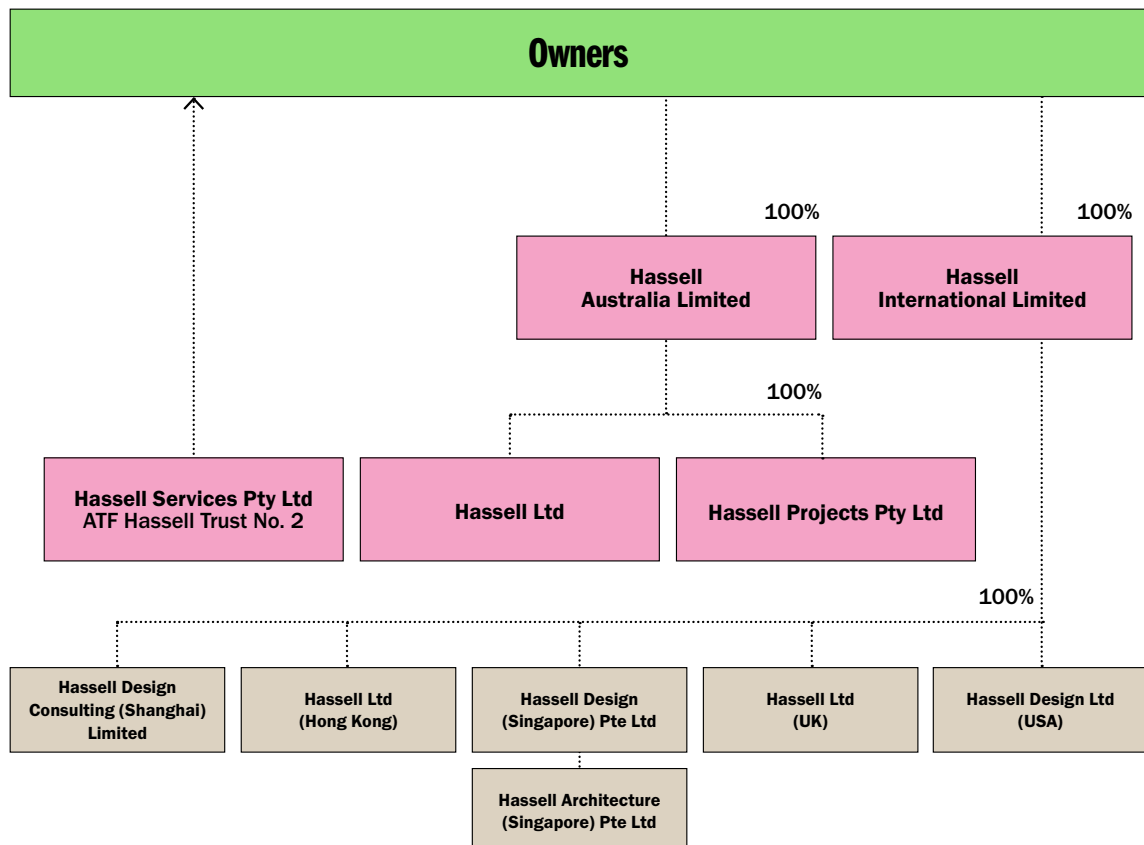
## Overview

Hassell is a leading international design practice with studios in Australia, China, South East Asia, the United Kingdom, and the United

States of America. At Hassell, we believe design has the power to create a better future. Globalisation, climate change, urbanisation, and digitisation present new opportunities and challenges for how we live.

In this fast-changing context, we bring together the best designers and thinkers in a unique collaborative process that results in both beautiful design and measurable value.

Diagram 1 – Hassell Group Corporate Structure



**Structure**

In Australia we primarily operate through Hassell Ltd (ABN 24 007 711 435), a wholly owned subsidiary of Hassell Australia Ltd (ABN 34 128 785 080); both entities are reporting entities for the purposes of the Modern Slavery Act 2018 (Cth). In other jurisdictions we operate through local subsidiary companies of Hassell International Limited (ABN 24 128 785 099). In the United Kingdom this is Hassell Ltd (UK) (Company No: 07545819); other entities within the Hassell group are shown in Diagram 1 on the previous page.

**Operations**

We work across architecture, landscape architecture, interior design, and urban design – a rich inter-disciplinary mix of skills and perspectives that unlocks the economic, social and cultural value of projects.

Our design services are organised by sector, to bring together our expertise to the clients we serve – Commercial & Workplace, Education & Science, Health, Culture & The Arts, Transport, Environment & Communities, Public Spaces, Residential and Mixed use including Hospitality and Retail.

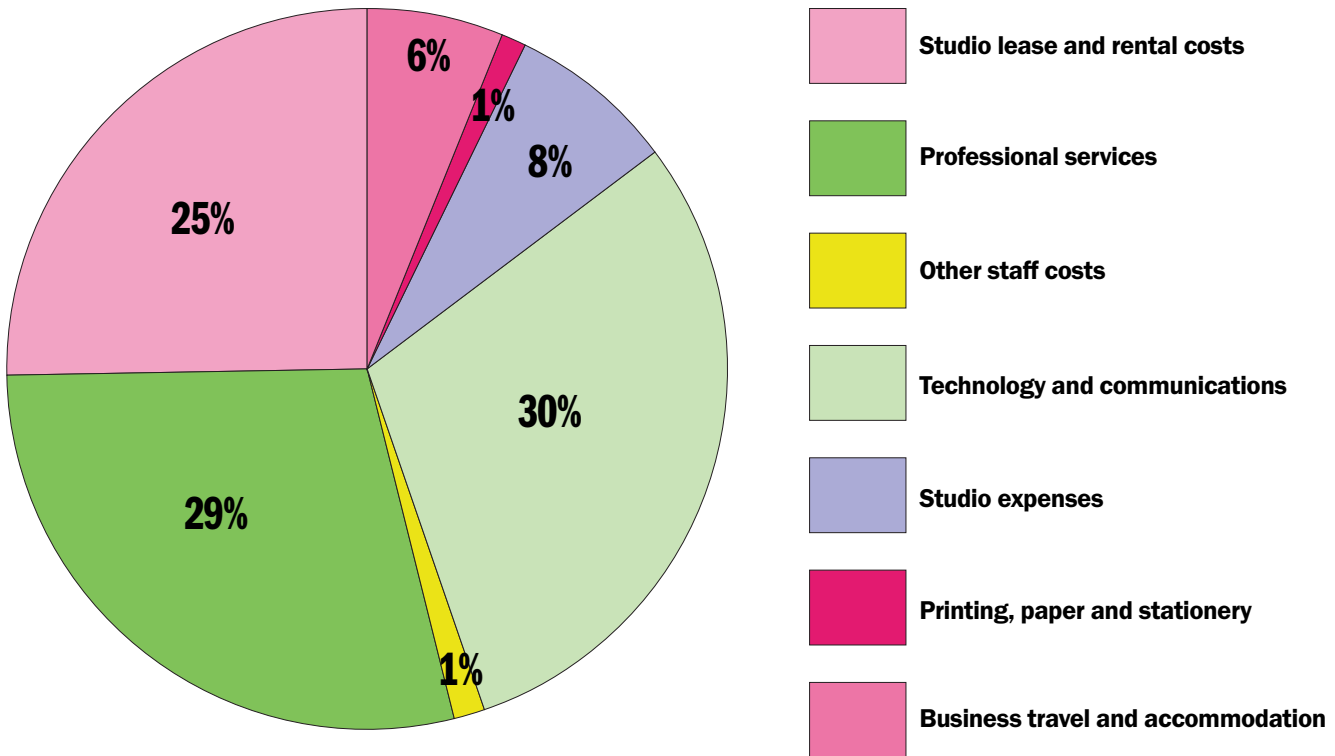
To deliver our services, we employ a total of 765 staff across our nine studios, including architects, designers, and business function personnel. As at the end of the June 2023 we had 545 employees in Australia and 220 located outside Australia.

**Supply chains**

Our supply chains within Australia and internationally are comprised predominantly of other professional design firms who may be engaged as sub-consultants on our project work. These suppliers after excluding staff salaries in FY2023 accounted for approximately 63% of our total supply chain. The remainder comprises various suppliers required as part of our normal business operations 37%.

For the purposes of this Statement, we have focused on suppliers of goods and services that support the operation of our studios. In FY2023 this comprised 830 suppliers with whom we contract and purchase from directly. The diagram below provides a breakdown of our corporate supply chain spend by sector, excluding project consultants and sub-consultants.

**Diagram 2 – Hassell Supply Chain - Breakdown of FY23 Spend**



# GOVERNANCE & POLICIES

## Our governance

A Board of Management oversees our strategy and operations and retains overall responsibility for risk management across and within our organisation. Our Board regularly identifies, evaluates, and responds to key strategic, operational and other risks and provides oversight of our modern slavery risk and reporting program.

Our Risk and Audit Committee (RAC) supports the Board to fulfil its responsibilities in relation to our risk management system, compliance and quality management systems, and external and internal audit activities. The RAC monitors adherence with all applicable laws and regulations, including our modern slavery reporting, and maintains responsibilities for oversight of both practice and project level risks. For example, the RAC was established to, amongst other tasks, assess and consider risks associated with any new projects being considered in countries outside our immediate countries of operation. This includes assessing project opportunities in countries that pose a higher inherent risk of modern slavery, as identified in the 2023 Global Slavery Index, and which therefore may present higher risks in the local supply chain.

Our Board and RAC are supported by committees and local leadership in each of the regions and sectors in which we operate. Our Modern Slavery Working Group operated throughout the reporting period to provide focussed input and guidance on the continuous improvement of

our modern slavery risk and reporting program. The Working Group comprises representatives from each of our regions and operating entities in these regions, including from our finance, legal, business support, and professional disciplines.

## Our policies and procedures

Hassell has various policies and procedures in place which respond to modern slavery risks that may arise in our operations. These policies and procedures apply to all Hassell operations globally, and consist of our:

- Code of Ethics, which enshrines our commitment to human rights, to respect the rights of those who work for and with us.
- Policies addressing Equal Opportunity, Prevention of Bullying, Discrimination and Harassment, which set out our responsibilities and obligations for providing an inclusive and equitable workplace that is free from all forms of discrimination and harassment. These policies also define our standards of appropriate workplace behaviour.
- Work Health and Safety (WH&S) Policy, which seeks to ensure we maintain a safe and healthy workplace for the prevention of work-related injuries and ill health for all employees and individuals visiting our premises or affected by our activities. Our WH&S policy forms part of our WH&S management system, which is certified to international standard ISO 45001.

→ Whistleblower Protection Policy, which outlines our obligations to protect those reporting suspected or perceived illegal or undesirable conduct, including current and former employees, contractors, suppliers, and relatives.

→ Anti-Bribery Policy, which defines our position on preventing and prohibiting bribery, and establishes our high standards of ethical conduct and integrity in how we do business globally.

All employees are required to read these policies, and associated procedures and guidelines during their new starter onboarding. These policies are also available to all staff on our intranet.

We continue to demonstrate our commitment to ensuring we protect human rights through our Gender Equity Framework, regular training and development on related topics for our employees, and access to Employee Assistance Program support services.

Our Risk Management Policy and accompanying Protocols document complement our governance structure, and the above policies and procedures. Together, these documents provide a logical and systematic process for the identification, assessment, management, and monitoring of material risks associated with our business operations.



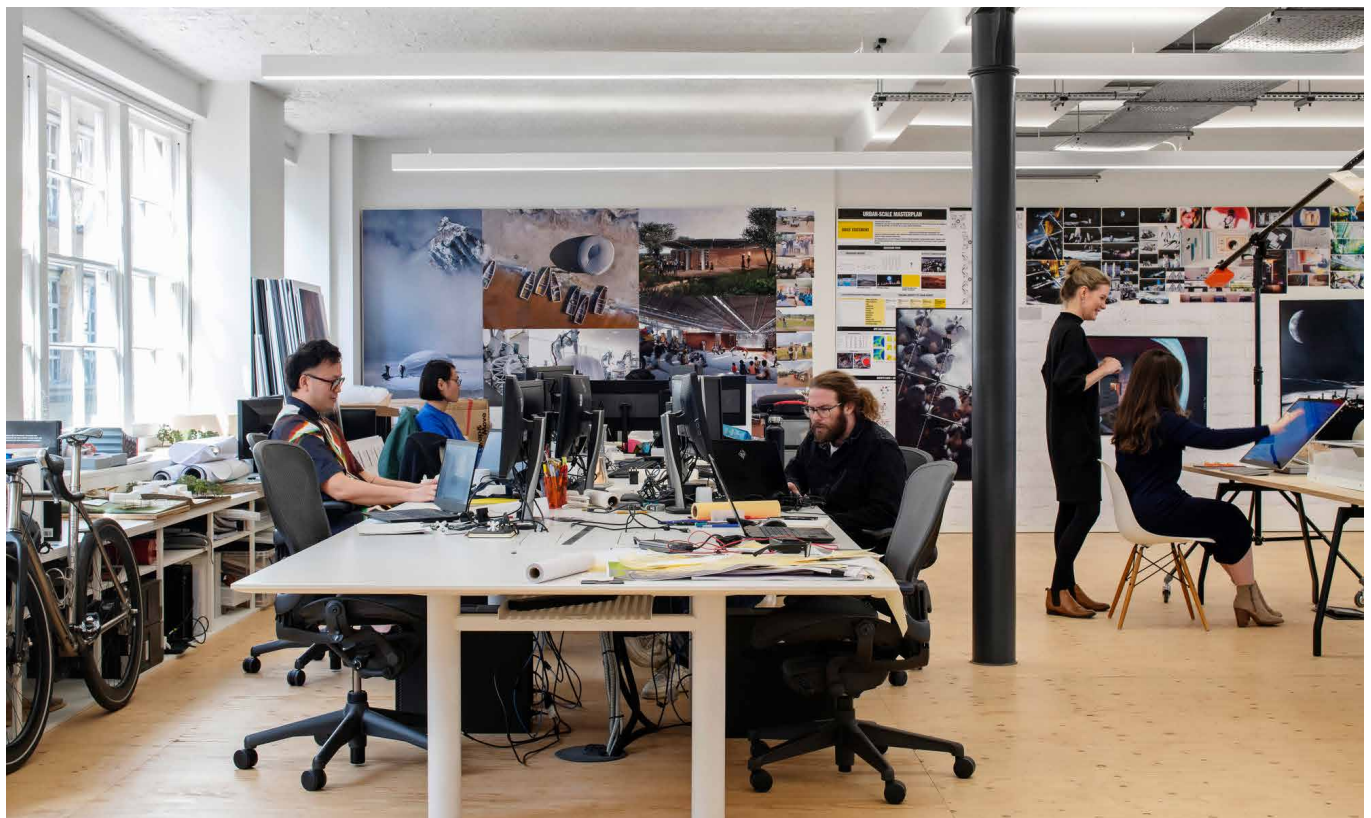
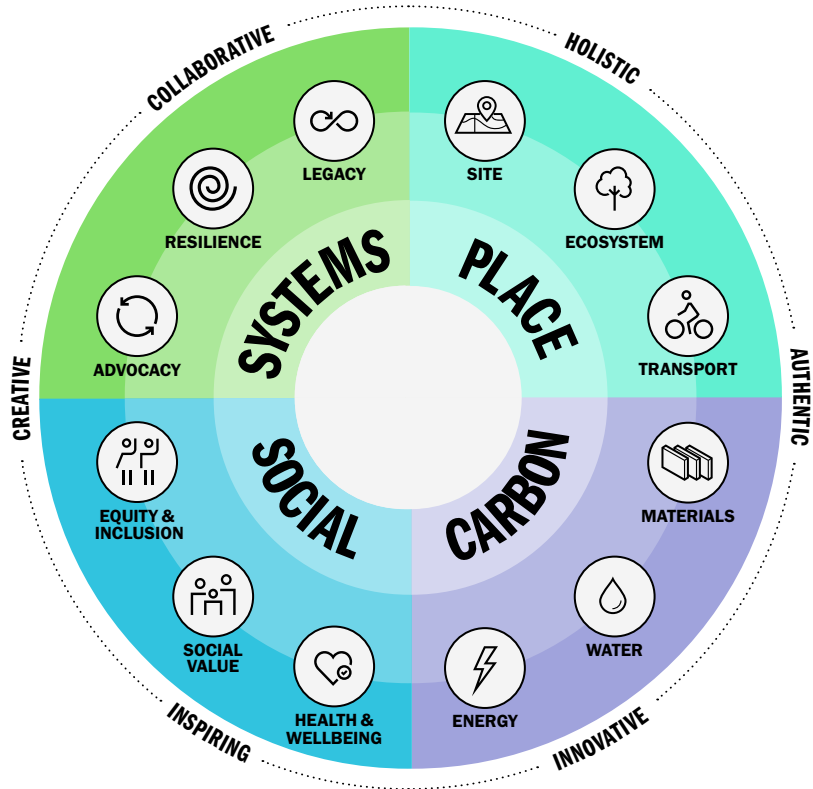
Our approach is based on AS/NZS ISO 31000:2018 Risk Management and is designed to integrate with our Professional Practice System. While the implementation of the Risk Management Policy is the responsibility of the Board of Management, all Principals and employees have a role to play in the ongoing management of the threats and opportunities that we encounter on a day-to-day basis. This includes the identification and assessment of modern slavery risks that may arise in our operations and supply chain.

**Sustainability Framework**

Our revised Sustainability Framework was launched during the reporting period, solidifying our increased focus and attention on making society more regenerative, resilient, and inclusive. The 'Social' area of the Framework captures and reflects our aspiration to reduce harm to our local and global communities and create positive impacts on health and well-being, quality of life, diversity, inclusion and resilience

Our Framework defines our ambition to contribute to improved social systems and will foster improvements to our modern slavery risk and reporting program. This includes near-term changes in our practices for advancing human rights and promoting sustainable procurement; more information can be found on pages 11 and 12.

**Diagram 3 – Sustainability Framework**



# MODERN SLAVERY RISK ASSESSMENT

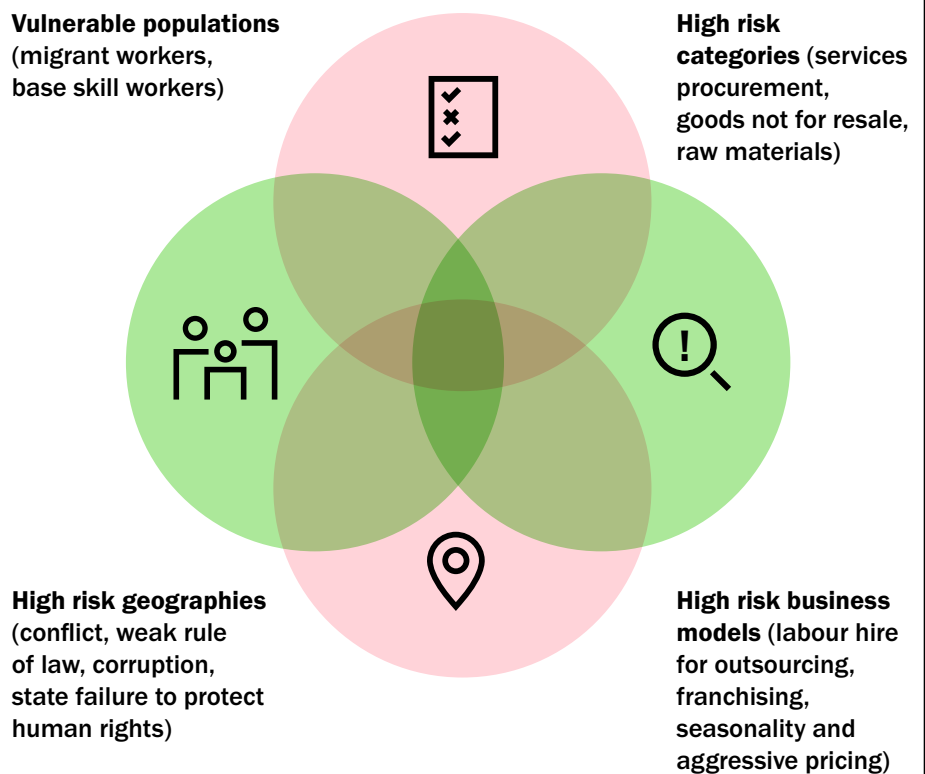
In preparing our FY2023 Statement, and in line with previous years, we have referred to the guidance of KPMG and the Australian Human Rights Commission (AHRC) as published in their sector-specific report "[Property, Construction and Modern Slavery. Practical Responses for Managing Risk to People](#)" (2020).

The consideration of KPMG and AHRC's key modern slavery risk factors applicable to the property and construction sector has been pertinent to inform our initial approach to modern slavery risk assessment. These multiple risk factors both individually and collectively heighten the risk of modern slavery in our sector: vulnerable populations, high risk business models, high risk categories, and high risk geographies (refer to Diagram 4).

During the reporting period we responded to developments in modern slavery research information and data, including but not limited to the publication of the 2023 Global Slavery Index. The availability of this information, and changes in resourcing our modern slavery risk and reporting program (see page 11), led us to revise and extend our risk assessment approach

As stated in the 2023 Global Slavery Index, on any given day in 2021 there were an estimated 50 million people living in modern slavery, more than any other time in human history. Indeed, the built environment sector is not immune to the risk of modern slavery, and as shown in the Design for Freedom Toolkit, is one of the highest risk sectors.

**Diagram 4 - adapted from KPMG and AHRC's Key Risk Factors in Property & Construction**



Materials in the construction sector known to have indicators of higher modern slavery risk include steel, timber, stone, copper, iron, glass, bricks, and rubber, and the provision of construction labour is one of the highest risk service types.

In light of the above context, in FY2023 we prepared, and will continue to update, a detailed assessment of salient modern slavery

risks within our operations and supply chain. While not specifically required by the Australian and UK Acts, we have also performed an assessment of modern slavery risk indicators in relation to our delivery of design and architecture services, recognising our influence in material, product, and service selection in the built environment sector.



In doing so, and in improving the maturity of our practices, we have sought to align to guidance found within the United Nations Guiding Principles on Business and Human Rights (UNGPs). For FY2023, this included:

- Taking a victim-centred approach that focused on vulnerable populations by assessing the risk-to-people, rather than the traditional risk-to-business approach practiced in operational risk management; and
- Adopting the continuum of involvement in our assessment, denoting whether we may cause, contribute to, or be directly linked to modern slavery practices through our operations and supply chains.

Our modern slavery risk assessment was performed using the most up-to-date resources available as of 30 June 2023, such as the 2023 Global Slavery Index and Design for Freedom

Toolkit (2022), and in collaboration and consultation with stakeholders across the organisation, including our People and Culture, Commercial, Technology, and Sustainability teams.

The risk assessment will be reviewed and updated at least annually going forward. A summary of our modern slavery risk assessment is found overleaf on page 9.

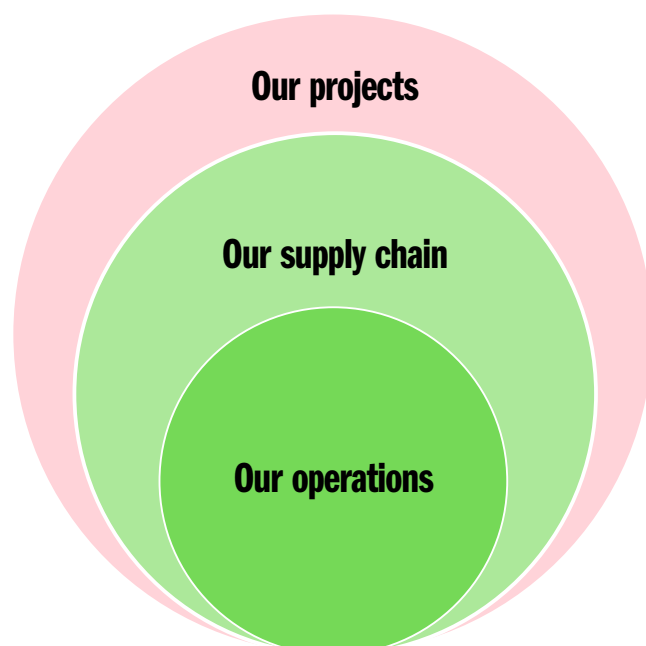


Diagram 5

| Area                                       | Risk(s) identified   | Ongoing actions and next steps   |
|--|--|--|
| <b>Our operations</b>                      | <p>The inherent level of modern slavery risk within our operations for our directly employed staff is deemed low, given the workplace protections in place that comply with applicable labour rights legislation where we operate.</p> <p>We have various policies and management practices to support our people and managers in complying with these laws. We conduct regular staff surveys and provide feedback on the results of the surveys.</p>  | <p>Continue to comply with applicable labour rights legislation, and provide a healthy, safe, inclusive, and equitable workplace for our staff.</p>  |
| <b>Our supply chain</b>                    | <p>We have identified a number of risk areas that warrant further action in our procurement and purchasing processes and practices, including:</p> <ul style="list-style-type: none"> <li>→ <b>Higher risk supplier categories</b> – includes cleaning services and supplies, catering services and supplies, security, technology equipment and services, office equipment and supplies, building repairs and maintenance, courier/postage, waste management, hotels and accommodation, and event equipment hire</li> <li>→ <b>Higher risk geographies</b> – such as parts of the wider Asian region subject to weaker human rights and worker protections</li> <li>→ <b>Higher risk business models</b> – for example, where business structures and hiring practices are suspected of relying on vulnerable worker populations, third-party or agency hiring, and/or are opaque to investigation</li> </ul> | <p>Areas of higher modern slavery risk are addressed through our regular supplier screening and evaluation processes.</p> <p>We recognise the need for a sustainable procurement approach that considers and takes action on modern slavery in our supply chain; this is currently in development.</p> <p>We will continue to engage with our suppliers to promote awareness and understanding of our expectations regarding human rights and ethical conduct. We encourage them to take steps to eradicate modern slavery and human trafficking from their operations and supply chains</p> |
| <b>Delivery of services / our projects</b> | <p>We have identified a number of higher risk areas that warrant further action in our materials specification and related project processes, including:</p> <ul style="list-style-type: none"> <li>→ <b>Construction materials</b> – bricks, clay, copper, glass, minerals (e.g., mica, gypsum, silica), rubber, steel and iron, stone / granite, textiles (e.g., carpets, rugs, upholstery, bedding), timber, precursors (e.g., lime, cement)</li> <li>→ <b>Equipment and infrastructure</b> – solar panels / PV arrays / polysilicon, electrical componentry</li> <li>→ <b>Construction labour</b></li> </ul>   | <p>Areas of higher modern slavery risk arising from the materials and services on our projects are being addressed through various project-facing practices, namely our materials research program of work.</p> <p>While early in our journey, we have begun to lay the foundation to improve the reach of our program in years to come.</p>   |



# ACTIONS TAKEN

The FY2023 reporting period was a pivotal year for our modern slavery risk and reporting program, as we sought to align our program with the context, ambition, and actions of our Sustainability Framework, and to evolving best practice guidance on identifying and responding to modern slavery risk. Our actions during the period are described below.

## Relaunch of our Modern Slavery Working Group

To turn the targets of our Sustainability Framework into reality, we have sought to engage and cultivate internal capability across a breadth of sustainability disciplines, including in modern slavery and human rights. With this competency now within our organisation, we allocated the role of Chair of our Modern Slavery Working Group to our newly appointed Sustainable Business Leader, to drive continuous improvements in our modern slavery risk and reporting program going forward.

Following the relaunch of our Modern Slavery Working Group, the Working Group met regularly throughout the reporting period, to both discuss and collaborate on improvements to better assess and manage modern slavery risk across our global practice, and to prepare this Statement.

## Risk management integration

In accordance with our Risk Management Policy, and to ensure the recognition of modern slavery risk within our operational risk management structure, our Risk Register was updated during the

reporting period to include the risk of modern slavery in our operations and supply chain. Recording and reviewing the risk of modern slavery within our Risk Register improves the oversight and governance of our modern slavery risk and reporting program, and this risk will be reviewed and updated on a regular basis.

## Supplier evaluation

Having performed a revised modern slavery risk assessment during the reporting period (see pages 7 to 9), we were able to refocus our supplier evaluation activities on categories with higher indicators of modern slavery risk.

For the suppliers we purchased goods and services from during FY2023, we completed a desktop supplier evaluation exercise on a representative sample of suppliers in higher risk categories, which included:

- searching the Modern Slavery Statement Register for published statements;
- performing internet and supplier website searches to assess suppliers' current status with respect to Statement publication in Australia or in other jurisdictions; and
- distributing supplier questionnaires to directly engage with suppliers to review their practices for identifying, assessing, and addressing risks of modern slavery practices in their operations and supply chain, where no other information was publicly available.

This year we sent an increased

number of questionnaires to those suppliers who do not publish their own Modern Slavery statements, with a focus on those in higher risk industries and sectors. We have had mixed results with responses to questionnaires, in particular from those small and medium sized businesses that may otherwise not meet thresholds to respond to Modern Slavery legislation directly. We recognise that our role in combatting modern slavery extends to ongoing supplier engagement to raise awareness of this issue and provide advice and support to smaller suppliers with limited staffing and resources to respond to modern slavery risks in their respective industries.

## Sustainable procurement strategy

During FY2023 we started developing our global sustainable procurement strategy that aligns with our Sustainability Framework, and that specifically responds to each studio location where necessary. This strategy will include and embed screening and evaluation practices for modern slavery risk and involve focused engagement and support with suppliers in higher risk categories and geographies.

To date, Hassell's key business functions in relation to sustainable procurement, namely Finance and Technology, and our Studio Managers and Sustainability Communities, have been provided with a briefing on the need for, and approach to develop, our sustainable procurement strategy.

This briefing outlined the indicative outputs of the strategy, which are anticipated to include the following:

- Sustainable Procurement Policy
- Sustainable Procurement Guide
- Supplier Code of Conduct
- Preferred supplier lists

The development of the sustainable procurement strategy will continue into FY2024, followed by its implementation across our practice

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### **Sub-consultancy partner agreements**

Given the predominance of professional services providers within our supply chain, we have continued to use our sub-consultancy agreement templates that include contractual provisions aimed at combatting modern slavery. The existing provisions require our sub-consultants to:

- Not engage in any conduct that contravenes modern slavery legislation,
- Comply with Hassell's Code of Ethics; and
- Provide details of their supply chain to enable us to comply with our own modern slavery obligations.

These contractual provisions were reviewed by representatives from our Legal, Commercial, and Group Sustainability teams during the reporting period, and these teams determined that no changes were needed. The Working Group will continue to review and update these clauses in future periods in accordance with better practice guidance and recommendations.

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### **Grievance reporting mechanisms**

In FY2023 we worked closely with an external provider to develop a platform for grievance reporting within our organisation. The platform is being prepared for roll out to all staff in FY2024 and provides an anonymous mechanism to report a broad scope of grievance categories, including any alleged instances of

harassment, bullying, discrimination, code of ethics breaches, bribery, corruption, environmental incidents, and similar issues. The platform will also be used to report any suspected instances of modern slavery in our operations or supply chain.

During the reporting period, we have not identified any instances of modern slavery in our operations nor supply chain. We do, however, recognise the complexity and opacity of global supply chains, and will continue to improve our processes for gaining transparency and insight into our supplier networks so that we are suitably informed of, and can act on, potential instances of modern slavery should they occur.

We have identified the need to develop dedicated procedures to effectively respond to identified instances of modern slavery in our operations or supply chain. At present, any such instances would be responded to in accordance with our existing policies and procedures. The development of dedicated procedures has been identified as a focus area for future action.

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### **Training and awareness**

Our Operations Executive team and other relevant employees have been made aware of the risks of modern slavery and human trafficking, and our policies have previously been updated as set out above.

We reviewed our existing training module on modern slavery risk and reporting and deemed this content to be relevant and appropriate. To complement and support this resource and to provide recent updates on modern slavery, targeted training was delivered to each Hassell studio, to the Studio Manager and Sustainability Community members in each location. This included content on both contextual and legislative developments, and improvements to Hassell's own program.

Measurement of modern slavery

awareness before and after the training demonstrated that the sessions were beneficial in improving awareness levels on the topic of modern slavery, both generally and related to our program. Through delivery of the training, we identified that future training and awareness should focus less on general updates and information, and more on how this knowledge can be applied practically for both our practice and our projects.

Throughout the period, contract administration training was delivered to all staff globally by our Legal team. This included information on our sub-consultancy agreement templates and how they are to be used by our practice. The content of this training is supplementary to our tailored modern slavery training and provided guidance to our staff on risk and governance arrangements, such as the role and function of our Risk and Audit Committee.

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### **Materials research and selection**

In taking initial steps to address modern slavery risk beyond our direct supply chain, we have started developing a suite of tools and assets to support our staff in making informed decisions on materials selection on our projects. These tools and assets are being designed to provide clear parameters to assess sustainability criteria during materials specification. While still in development, the initial parameters for material supplier assessment include:

- Transparent labour practices
- Human rights policies and practices
- Consumer issues policies
- Fair operating practices
- Modern slavery risk indicators
- General equality policies and initiatives

# ASSESSING EFFECTIVENESS & CONSULTATION

During the development of our modern slavery risk and reporting program, our initial focus was on understanding where and how modern slavery risks may be present in our operations and supply chains.

In FY2023, to improve the maturity of our approach beyond the monitoring of supplier evaluation responses, we started developing an approach to measure key performance indicators (KPIs) that monitor the effectiveness of our program over time.

Our approach was discussed with the Modern Slavery Working Group, with four areas of focus for setting our KPIs in future periods:

- Governance, ethics, and risk
- Procurement and supply chain
- Grievance reporting and remediation
- Training and awareness

Specific KPIs have not yet been determined or agreed, however we have developed an indicative data tracking dashboard to record a variety of proposed metrics. These metrics will be reviewed in FY2024 to select the most suitable for measuring the effectiveness of our program.

## Consultation and engagement

As noted, our Modern Slavery Working Group includes representatives from each of our regions and operating entities in these regions. These representatives have consulted more widely with their local businesses in conducting the outlined supplier evaluation process. In preparing this Statement we consulted with all Hassell owned or controlled company entities through engagement with the Working Group representatives. This included discussing the mandatory reporting criteria of both the Australian and UK Acts, and providing updates on emerging modern slavery risks, issues, and themes pertinent to the reporting period.

## Other relevant information (external engagement and capability building)

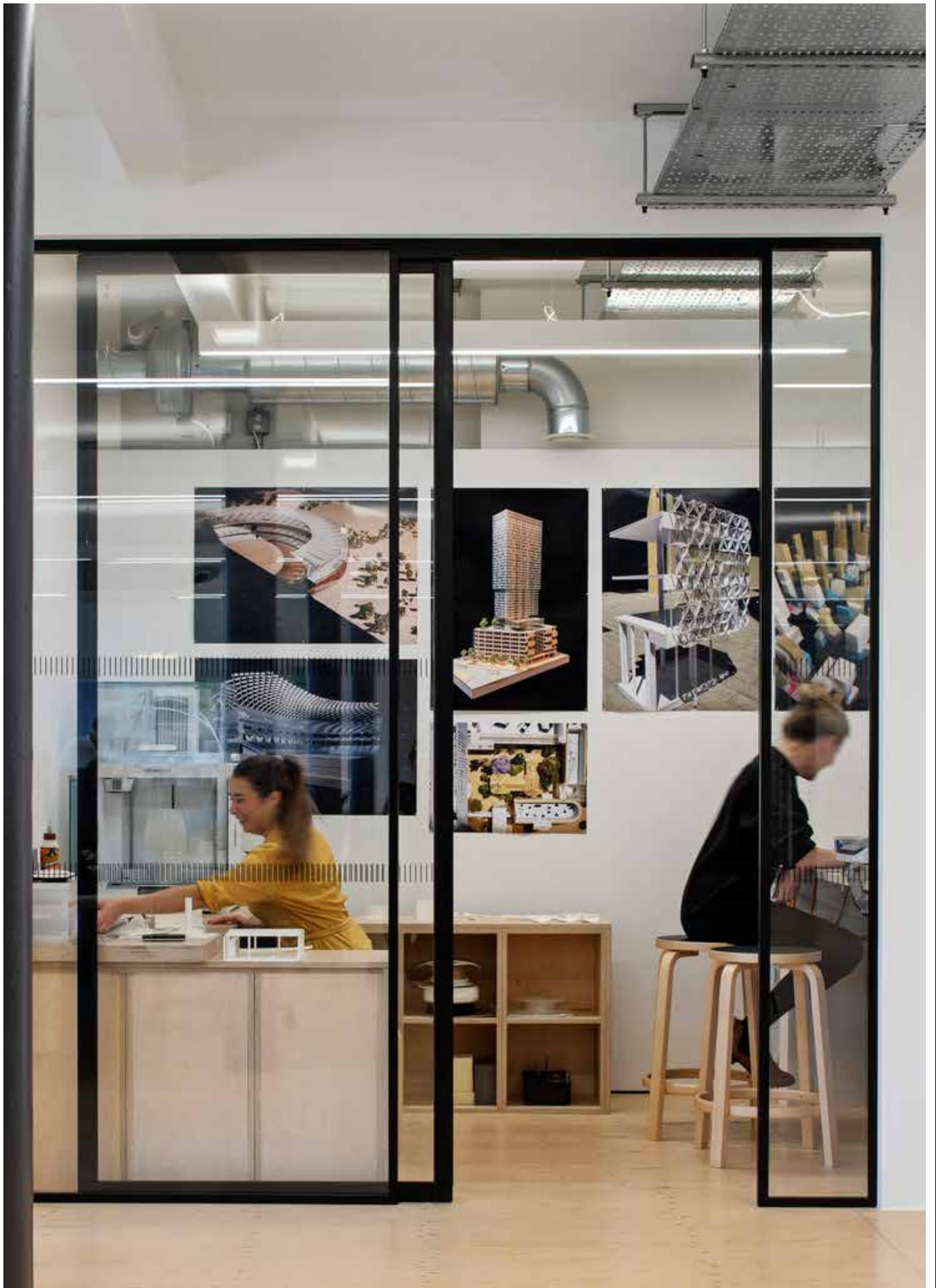
We are committed to actively engaging in industry to continue to build our build knowledge and expertise on modern slavery risks and issues. During FY2023 we have increased our involvement with the United Nations Global Compact Network Australia (UNGCNA), becoming a participant of the Modern

Slavery Community of Practice and regularly attending UNGCNA knowledge sharing and capacity building events on business and human rights.

We attended the 2023 Modern Slavery Conference hosted by the Commonwealth Attorney-General's Department, joining the event alongside stakeholders from government, business, civil society, academia, and survivor groups. The conference provided the opportunity to learn from diverse experience and expertise on modern slavery issues and developments, including across a breadth and depth of case studies, research, data, and best practice insights.

Recognising the importance of research in combatting modern slavery, we participated in a sector-specific academic study on modern slavery in architecture, providing our insights and expertise to contribute to a growing body of knowledge on modern slavery issues in the built environment. We will actively support similar research projects as they arise in the future.





# LOOKING AHEAD

The following items have been identified by the Modern Slavery Working Group as priority actions for the next reporting period:

| Priority action                                       | Description  |
|---|--|
| <b>Expand the scope of our program</b>                | Conscious of the developments in human rights due diligence standards and regulation, we will take the first steps in expanding the scope of our modern slavery risk and reporting program to the broader spectrum of human rights risks and issues in our operations and value chains.  |
| <b>Review our policies</b>                            | In parallel to the above, we will perform a review and rationalisation of our policies and procedures to ensure currency, consistency, and alignment with our broadening human rights program.   |
| <b>Implement our sustainable procurement strategy</b> | Our approach to sustainable procurement for our practice will be implemented across our business functions and studio locations, complemented by a tailored supplier engagement program that provides support and guidance to small and medium sized businesses operating in sectors and geographies with higher modern slavery risk indicators. |
| <b>Roll out grievance reporting platform</b>          | Our platform for anonymous and confidential grievance reporting will be rolled out across our practice and accompanied by improvements to our reporting and remediation practices.   |
| <b>Improve training and awareness</b>                 | Utilise our internal learning platform and available resources to develop tailored modern slavery training modules, catering to project and business function employees respectively, and include this training as part of our onboarding program for new starters.  |
| <b>Continue external engagement</b>                   | We will continue to be actively engaged with industry bodies, collaborative partnerships, and subject matter experts on modern slavery and human rights, including the UNGCNA's Modern Slavery Community of Practice.  |
| <b>Measure our actions</b>                            | We will improve our practices for measuring the effectiveness of actions, including the focused selection and monitoring of meaningful KPIs, metrics, and indicators.  |

## Australia and UK reporting criteria

To aid readers of this Statement, we have prepared the following table to denote the location of our responses to the reporting criteria of section 16(1) of the Modern Slavery Act 2018 (Cth) and section 54(5) of the Modern Slavery Act 2015 (UK) respectively.

| <b>Section 16(1): Australian Modern Slavery Act: Mandatory Reporting Criteria</b>   | <b>Section 54(5): UK Modern Slavery Act: Reporting Criteria</b>  | <b>Page</b> |
|---|--|-------------|
| a) Identify the reporting entity  |  | 1           |
| b) Describe the structure, operations and supply chains of the reporting entity   | a) Organisation's structure, its business and its supply chains  | 3-4         |
|   | b) Organisation's policies in relation to slavery and human trafficking  | 5-6         |
| c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls                            | c) Its due diligence processes in relation to slavery and human trafficking in its business and supply chains  | 7-12        |
| d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes | d) Parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk           |             |
| e) Describe how the reporting entity assesses the effectiveness of such actions   | e) Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate | 13          |
|   | f) The training about slavery and human trafficking available to its staff   | 12          |
| f) Describe the process of consultation with:   |  | 13          |
| i. any entities that the reporting entity owns or controls; and   |  |             |
| ii. in the case of a reporting entity covered by a statement under section 14—the entity giving the statement.  |  |             |
| g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant  |  | 13-16       |

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