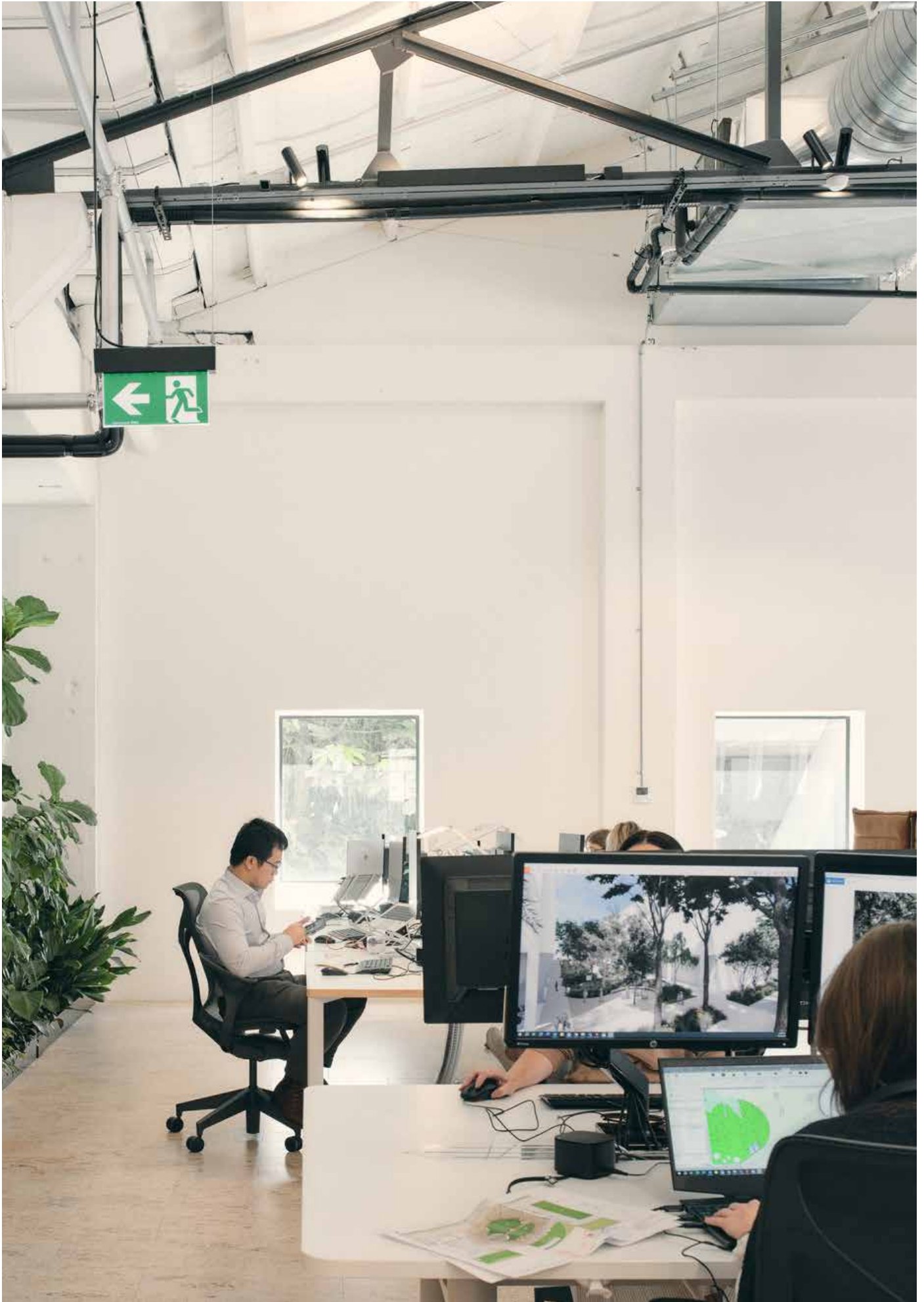

**MODERN SLAVERY
AND HUMAN
TRAFFICKING
STATEMENT**





Hassell
61 Little Collins Street
Melbourne VIC Australia 3000
T +61 3 8102 3000
E melbourne@hassellstudio.com
@hassell_studio

Contact
Jamie Hodgson
Sustainable Business Leader
jhodgson@hassellstudio.com
+61 3 8102 3079

1.	About this statement	1
2.	A message from our Managing Director	2
3.	About Hassell, Our Structure, Operations & Supply Chains	3
4.	Governance & Policies	5
5.	Understanding our Modern Slavery Risks	7
6.	Actions Taken	11
7.	Assessing Effectiveness & Consultation	18
8.	Looking Ahead	19

About this statement

Hassell's FY2024 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 2024 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 2024 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



Hassell's purpose is to create a better future by designing the world's best places – places people love. Our work centres on creating inclusive, sustainable and resilient environments that support communities at local, national and global levels. We aim to address both the opportunities and the complex challenges these communities face. A critical issue affecting our planet today is the prevalence of modern slavery, with an estimated 50 million people living in one or more forms of forced labour, human trafficking, or servitude – more than at any other time in human history.

Our industry is not immune to this global problem, with known areas of higher modern slavery risk in the deep and opaque value chains that produce and supply goods and services to the built environment. We remain opposed to slavery in all its forms and recognise the role that we play in its eradication. 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.

Over the past year, we have witnessed and welcomed several

developments in modern slavery and human rights regulation and legislation occurring around the world, in particular, the adoption of the Corporate Sustainability Due Diligence Directive in the European Union, and in Australia, the establishment of the first federal Anti-Slavery Commissioner. The continuing emergence of regulation and legislation to combat modern slavery highlights the severity of this issue and emphasises the role that businesses must play in respecting human rights. We look forward to further legislative developments about modern slavery and human rights in the jurisdictions in which we operate.

This is our fifth Modern Slavery and Human Trafficking Statement, and it describes the progress we have made in FY2024. In improving our modern slavery risk and reporting program, this year we have transitioned our existing Modern Slavery Working Group to our new Modern Slavery Advisory Group, updated our understanding of modern slavery risks following a review of recent research and guidance, and revised our approach for engaging with organisations in our supply chain. We have also implemented and

launched our grievance reporting platform, finalised the design of our sustainable procurement strategy, and prepared a Hassell-specific training module on modern slavery.

Looking ahead, we acknowledge there are opportunities to continue improving our modern slavery risk and reporting program. In FY2025 we will review our risk management practices to better respond to the changing nature and context of emerging environmental, social, and governance risks, roll out our sustainable procurement strategy across our business functions and studio locations, and extend access to our Speak Up Anonymous Whistleblower Platform to those in our supply chain. We will continue actively engaging with industry bodies and subject matter experts on modern slavery and human rights as we improve our technology systems and processes for enhanced sustainability data collection, analysis, and reporting, and continue designing a holistic human rights program.

Liz Westgarth
Managing Director

ABOUT HASSELL, OUR STRUCTURE, OPERATIONS & SUPPLY CHAINS

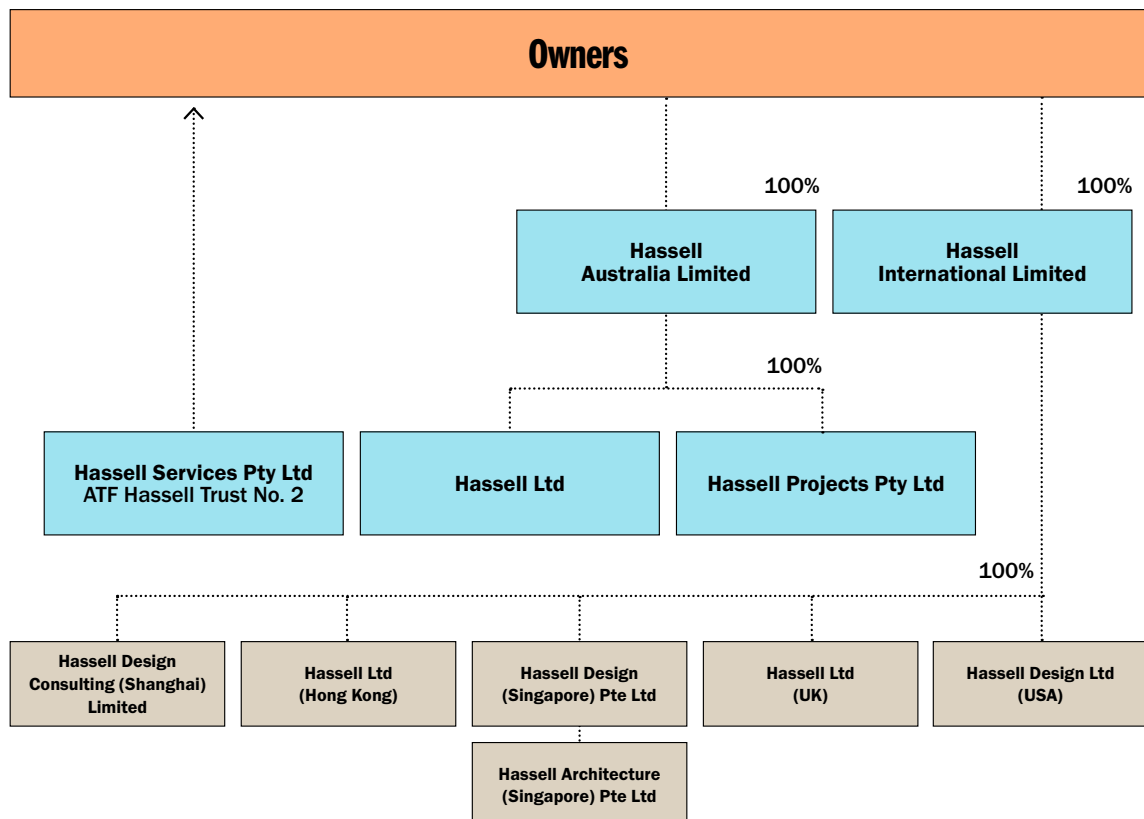
Overview

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.

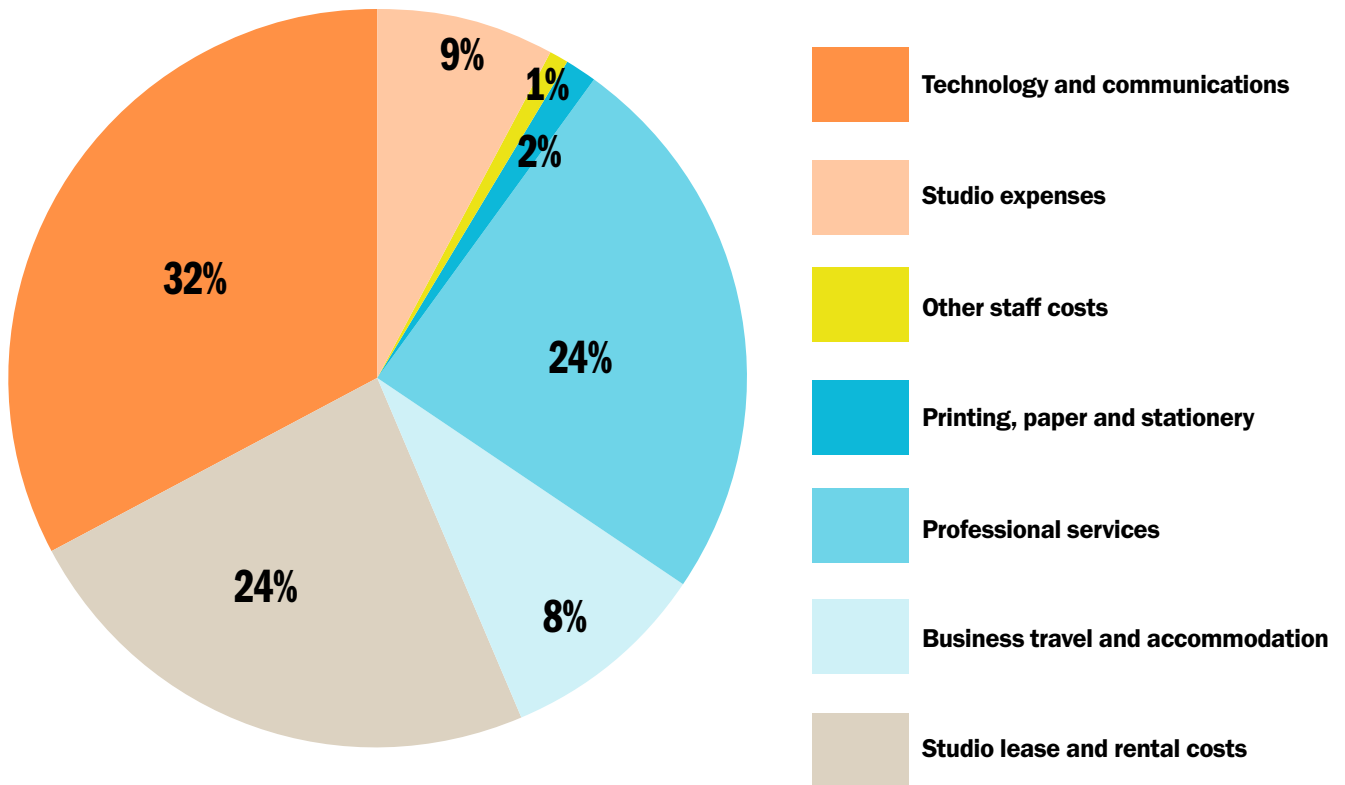
Our design services are organised by sector, to bring together our expertise to the clients we serve – Commercial & Workplace, Education & Science, Health, Culture & The Arts, Transport, Environment & Communities, Public Spaces, Residential and Mixed use including Hospitality and Retail. To deliver our services, we employ a total of 757 staff across our nine studios, including architects, designers, and business function personnel. As at the end of the June 2024 we had 553 employees in Australia and 204 located outside Australia.

Supply chains

Our supply chains within Australia and internationally are comprised predominantly of various suppliers required as part of our normal business operations. These suppliers accounted for approximately 58% of our total supply chain in FY2024. The remainder comprises other professional design firms who may be engaged as sub-consultants on our project work (42%).

For the purposes of this Statement, we have focused on suppliers of goods and services that support the operation of our studios, as this where we have identified indicators of higher modern slavery risk. In FY2024 our supply chain comprised 745 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 FY24 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 Advisory 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 Advisory 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 were in place throughout the reporting period. Relevant policies and procedures 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. Our Discrimination, Bullying and Harassment Policy was reviewed and updated during FY2024. It combined our previous policies on discrimination, harassment, and bullying and now includes information on our new Speak Up Platform (more information on the Platform can be found on page 13).
- 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 Sustainability Framework continued to be implemented in our practice and our projects throughout the reporting period, solidifying our increased focus and attention on contributing to a more regenerative, resilient and inclusive society. The 'social' area of the Framework captures and reflects our commitment to minimising harm while fostering positive impacts on both local and global communities. We aim to enhance health and wellbeing, improve quality of life, and promote diversity, inclusion and resilience through all our efforts.

To embed the operational components of our Framework, our Sustainable Business Strategy defines our ambition for a continuously improving modern slavery risk and reporting program. This includes upcoming changes to our practices aimed at advancing human rights and promoting sustainable procurement; more information can be found on pages 11 and 12.

Our Framework will be reviewed and updated regularly as we reflect on internal and external changes to our context and environment. We commenced the review of our Framework towards the end of FY2024, and this review will continue into FY2025.

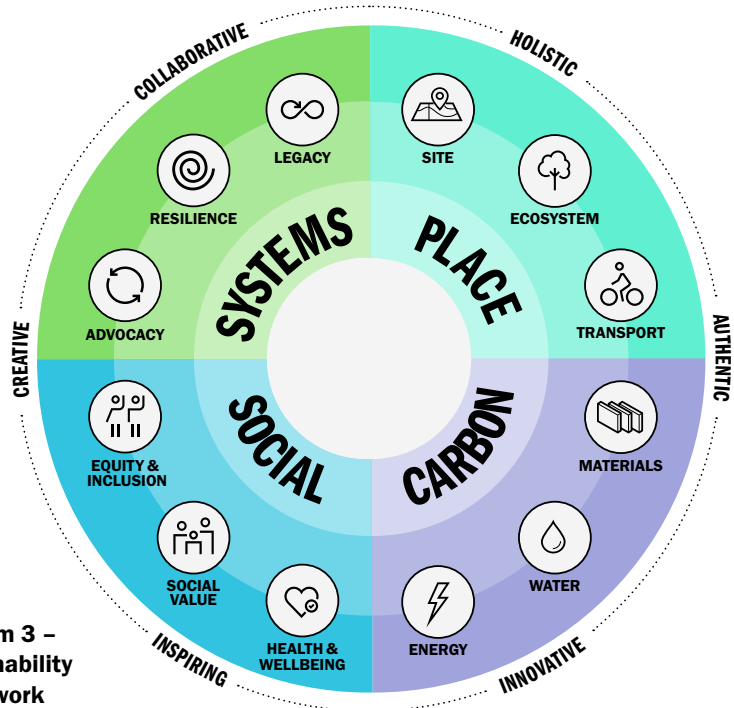


Diagram 3 – Sustainability Framework



UNDERSTANDING OUR MODERN SLAVERY RISKS

Risks in the built environment

Our approach for the identification of modern slavery risks in our operations and supply chains is informed by resources and guidance of relevance to the built environment. As in 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).

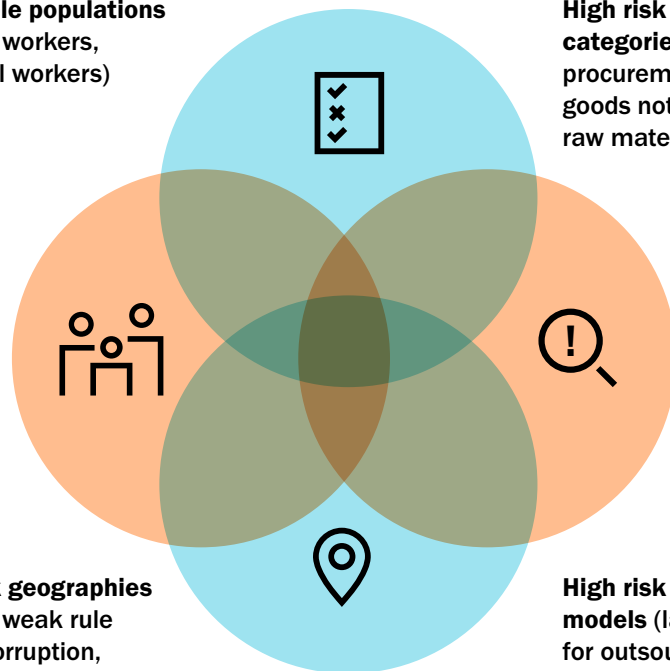
The key modern slavery risk factors within the property and construction industry as identified by KPMG and AHRC continue to inform the basis of our modern slavery risk assessment. These multiple risk factors both individually and collectively heighten the risk of modern slavery in our sector: vulnerable populations, high risk business models, high risk categories, and high risk geographies (refer to Diagram 4).

Being conscious and vigilant that the built environment sector is not immune to the risk of modern slavery, we continue to refer to and utilise the analysis of sector-specific modern slavery risk areas as found within the 'Design for Freedom Toolkit' (2022). 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.

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

Vulnerable populations
(migrant workers,
base skill workers)

High risk categories (services procurement, goods not for resale, raw materials)



High risk geographies
(conflict, weak rule of law, corruption, state failure to protect human rights)

High risk business models (labour hire for outsourcing, franchising, seasonality and aggressive pricing)

During the reporting period we sought and disseminated information and analysis available in recent guidance to ensure our knowledge of modern slavery risks remained up to date.

This included the practical guidance published by KPMG and the Property Council of Australia (PCA), namely 'Listening and Responding to Modern Slavery in Property & Construction: A Practical Guide for Effective Human Rights Grievance Mechanisms'

(2022) and 'Remediating Modern Slavery in Property & Construction: A Practical Guide for Effective Human Rights Remediation' (2022). We also referred to guidance within 'Pathway to Respecting Human Rights and Addressing Modern Slavery Risks' (2024) published by the PCA and Edge Impact.

Beyond the issue of modern slavery, we also consulted research publications on human rights in the built environment to enhance our awareness of other human rights issues in our sector, such as 'Advancing Just Transitions in the Built Environment – exploring human rights in the green transition' (2024), published by the Institute for Human Rights and Business.

Our broader approach to identify risks:

Our approach for identifying and understanding modern slavery risks more generally, including those outside of our industry, utilises recent information and guidance such as the '2023 Global Slavery Index' and 'Modern Slavery Risk Management: A playbook for Australian SMEs to identify, manage and mitigate modern slavery risks' (2023) published by the United Nations Global Compact Network Australia (UNGCNA).

Additionally, during the year we participated in collaborative industry initiatives to further our understanding of modern slavery risks in targeted areas. For example, our involvement in the research project led by Wikirate and Walk Free, which investigated the practices of electronic companies for tackling forced labour in their supply chains. Our engagement in this research helped us to develop a greater understanding of modern slavery risks present in the technology sector generally and informed our due diligence of a key technology vendor during the period (refer to case study two). The outputs of this research project will be published by Walk Free later in 2024 as part of their 'Beyond Compliance' publication series.

Updating our modern slavery risk assessment

In light of the above developments, in FY2024 we updated our assessment of salient modern slavery risks within our operations and supply chains. While not specifically required by

the Australian and UK Acts, we also updated our 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, we continued to align our approach to that of the 'United Nations Guiding Principles on Business and Human Rights' (UNGPs). For FY2024, this comprised:

- 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 reviewed and updated using the most up to-date resources available as of 30 June 2024, such as the '2023 Global Slavery Index', 'Design for Freedom Toolkit' (2022), and other resources as referred to previously.

Our risk assessment was also reviewed in consultation with stakeholders across the organisation, including our People and Culture, Commercial, Technology, and Sustainability teams. The risk assessment will continue to be reviewed and updated at least annually in future.

We acknowledge that standalone or 'hotspot' modern slavery risk assessments that are reviewed and updated on a recurring basis may not identify all modern slavery risk areas impacting our business. In FY2024 we commenced the targeted identification and assessment of modern slavery risks when making procurement decisions. Refer to the case studies in this statement for examples of the targeted approach we have adopted.

A summary of our modern slavery risk assessment is found overleaf on page 9. Our modern slavery risk assessment is an important component of our modern slavery risk and reporting program and is key to informing the actions we have taken during the period, alongside the best practice guidance and resources referred to throughout this section. Refer to pages 11 to 15 for our FY2024 actions.

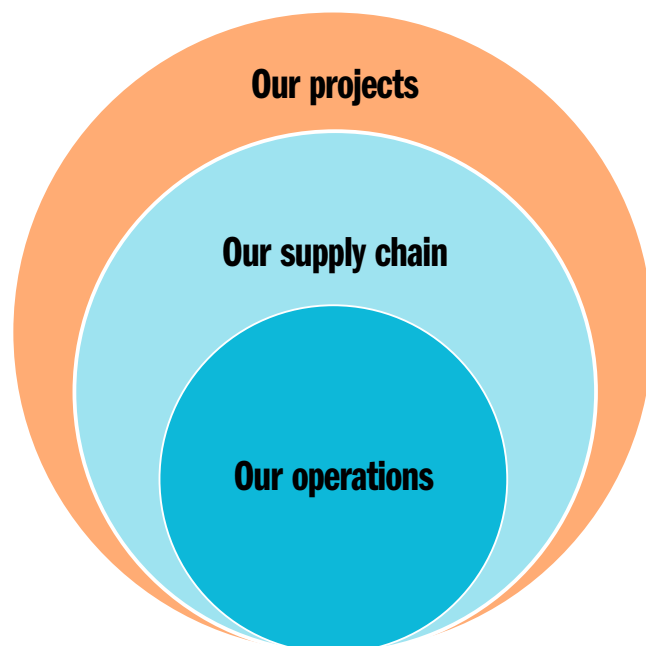
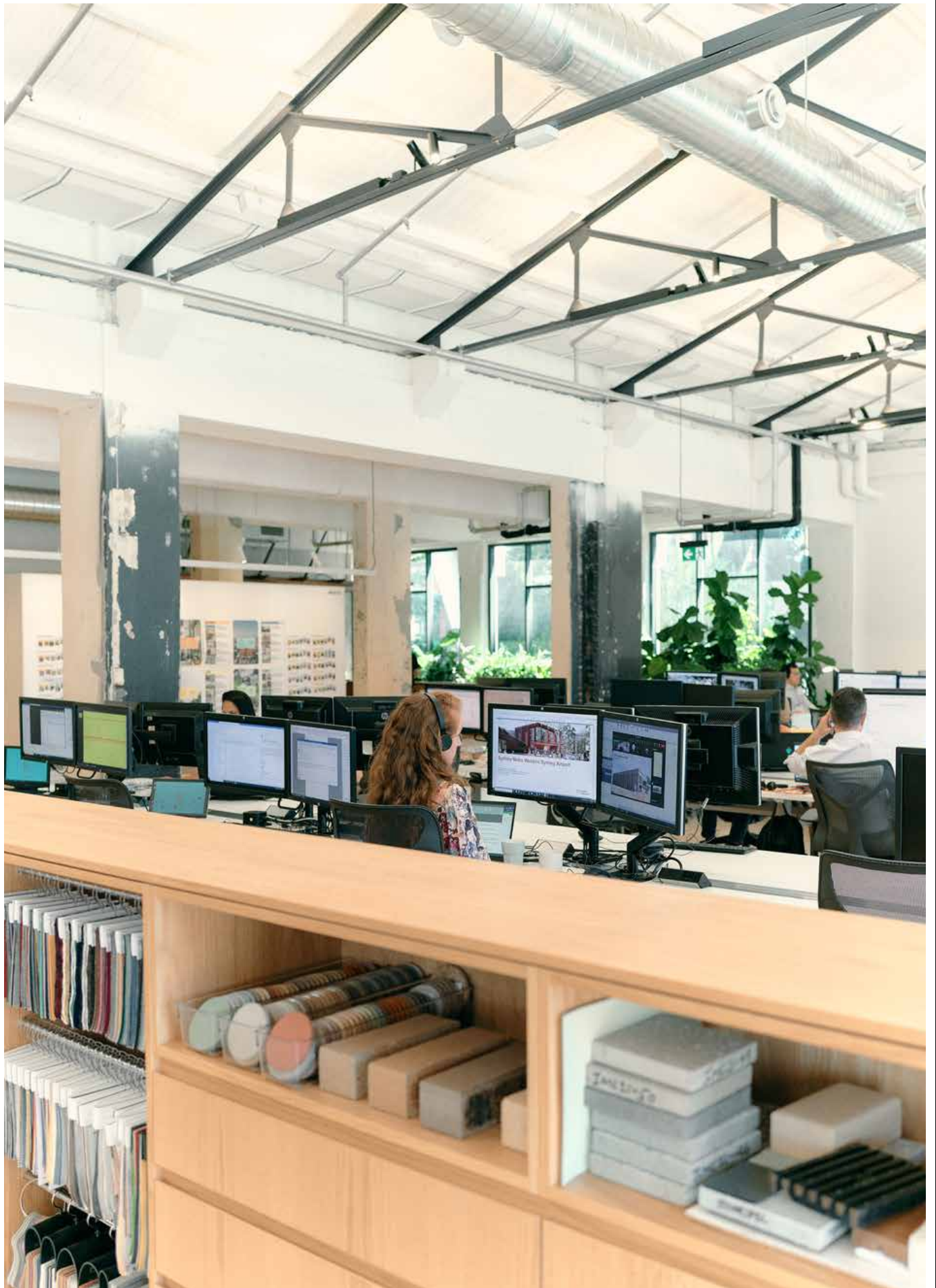


Diagram 5

Area	Risk(s) identified	Ongoing actions and next steps
Our operations	<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>
Our supply chain	<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"> → Higher risk supplier categories – 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 → Higher risk geographies – such as parts of the wider Asian region subject to weaker human rights and worker protections → Higher risk business models – 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. 	<p>Areas of higher modern slavery risk are addressed through our evolving approach to supplier screening and evaluation.</p> <p>Our sustainable procurement strategy has now been developed and is due to be implemented across our practice in FY2025, in accordance with our structured rollout program.</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 chain.</p>
Delivery of services / our projects	<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"> → Construction materials – 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) → Equipment and infrastructure – solar panels / PV arrays / polysilicon, electrical componentry → Construction labour 	<p>Areas of higher modern slavery risk arising from the materials and services on our projects are being addressed through due diligence reviews and supplier engagement on individual design projects.</p> <p>We have identified the need for, and value of, globally consistent practices and processes and have embedded key actions to identify and address modern slavery risk into our Materials Strategy and Implementation Plan.</p>



ACTIONS TAKEN

During FY2024 we continued improving our modern slavery risk and reporting program, seeking to respond and adapt to evolving best practice guidance and maintain alignment with the ambition and actions of our Sustainability Framework. Our actions during the period are described below.

Establishing our Modern Slavery Advisory Group

During the year, the role and remit of our existing Modern Slavery Working Group was reviewed and revised, with members of this group transitioning to form our new Modern Slavery Advisory Group. With dedicated resourcing to maintain and drive improvements in our modern slavery risk and reporting program, the primary purpose of our original Working Group changed, with the Group now transitioning to an advisory capacity.

Members of our new Modern Slavery Advisory Group have less of a role in actively operationalising aspects of our modern slavery risk and reporting program, and instead have a revised focus on providing specialist advice based on their respective role within our organisation. Our Sustainable Business Leader retains the operational responsibility for maintaining the modern slavery program.

Whilst differing in its purpose, the new Advisory Group includes representatives from each of our regions and operating entities in these regions.

The primary purpose of the Advisory Group is to drive continuous improvement in Hassell's modern slavery risk program and support the preparation of our modern slavery statement each year.

Risk management integration

Throughout the reporting period we continued to monitor the changing nature and context of environmental, social, and governance risks locally, nationally, and globally. In responding to this evolving and dynamic environment, we recognised that a review of our Risk Management Policy and associated protocols was needed to adequately respond. This review is underway and will continue during FY2025.

Sustainable procurement strategy

In FY2024 we took steps to engage across our practice globally to inform and design our sustainable procurement strategy. This comprised focused stakeholder 'listening' sessions with key business functions and local studio business support teams to understand the existing context and arrangements for purchasing across our organisation.

The outputs from these sessions were combined with insights from best practice guidelines on sustainable procurement to devise an approach that would suit our needs, incorporating modern slavery risk considerations. This culminated in a suite of materials to drive a coordinated and Hassell-wide approach to sustainable procurement, namely our:

- Sustainable Procurement Policy
- Sustainable Procurement Guide
- Sustainable Procurement Questionnaire (Small-Medium Enterprises)
- Sustainable Procurement Questionnaire (Corporates)
- Supplier Code of Conduct

Now prepared based on stakeholder need, our sustainable procurement strategy is due to receive executive endorsement in early FY2025 and be implemented across our practice thereafter, in accordance with our structured rollout program.

During the development of our sustainable procurement strategy, we took the opportunity to pilot our approach for procurement activities in industries at higher risk of modern slavery. Refer to the first two case studies in this statement, for cleaning services and technology procurement respectively.

Case study 1 – Cleaning services in London

During the year we identified the need to source a new cleaning services provider for our London studio.

As we developed our sustainable procurement strategy, we took the opportunity to design and use a sector-specific screening checklist for cleaning services in the UK, assessing the environmental, social, and governance practices of prospective suppliers.

Screening criteria on workforce policies included risk-based vetting questions on equitable working conditions, health and safety protocols, living wage practices, grievance reporting and resolution mechanisms, and the right to

freedom of association. Use of the checklist provided us with a structured means to assess prospective suppliers' employment practices and determine if appropriate safeguards were in place to alleviate modern slavery risk in a higher risk sector.

The outcome of this screening process supported London studio management to select a new cleaning services provider that had demonstrable positive employment practices, including Living Wage accreditation, policies and procedures for addressing discrimination, bullying, and harassment, and health and safety protocols. The supplier directly employs all its cleaning staff and does not subcontract and provides training on modern slavery issues.



Case study 2 – Computer monitors across our studios

In 2024 we commenced planning for the single largest purchase of computer monitors in Hassell's history, with our Technology team devising a coordinated and phased approach to replace monitor displays across our studios globally. This procurement initiative incorporated screening of the environmental, social, and governance practices of our existing technology vendor at the organisational level, combined with targeted screening at the product level.

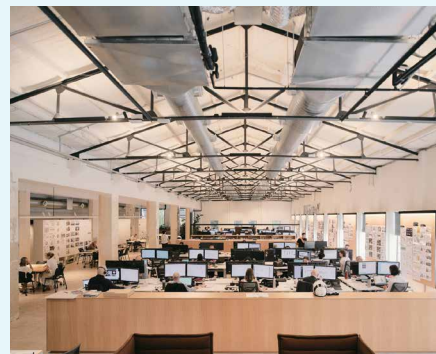
Specifically, in connection with our modern slavery risk and reporting program, we:

- Assessed the currency, rigour, coverage, and ambition of the vendor's global sustainability program and associated disclosures, including its most

recent slavery reporting, as well as its conflict minerals and human rights strategies and programs

- Performed a desktop media scan to identify any known human rights issues or controversies associated with the vendor's manufacturing and sourcing practices
- Examined the product-level sustainability attributes of the product models planned for purchase, where data was available, searching databases such as the EPEAT Registry to evaluate vendor social performance

Our Technology and Sustainability teams worked collaboratively to conduct the above screening activities, with the outcomes informing our purchasing decisions. The new monitor displays will be rolled out across our studios in FY2025.



Supplier and partner engagement and evaluation

Having reviewed and updated our modern slavery risk assessment during the reporting period (see pages 7 to 9), we took steps to refocus our supplier engagement and evaluation activities on categories with higher indicators of modern slavery risk, and in line with best practice guidance.

Previously, we had placed reliance on supplier self-assessment questionnaires, or SAQs, to identify and evaluate suppliers where we suspected indicators of higher modern slavery risk. However, during the year we recognised that supplier SAQs are becoming increasingly seen to have low effectiveness when it comes to supplier due diligence. Poor supplier response rates, notably in regions without modern slavery legislation, coupled with a perception as a 'tick box exercise' gave us sufficient cause to revisit our approach.

During FY2024 we began transitioning to a revised means of assessing and taking action on modern slavery risks in our supply chain. Firstly, we commenced targeted due diligence of supplier modern slavery risks and their associated practices to address these risks. This due diligence forms part of our soon-to-be implemented sustainable procurement strategy, as described previously, and the cleaning and technology procurement case studies within this statement are examples of our piloting of this approach.

Secondly, we continued to recognise that our role in combatting modern slavery extends to proactively engaging with suppliers to raise awareness of this issue and providing advice and support. This is particularly pertinent for smaller suppliers with limited staffing and resources to respond to modern slavery risks in their respective industries. Looking ahead we will seek to formalise and mature our approach for direct supplier engagement on modern slavery risk. This year, to improve and streamline

our engagement on modern slavery in our sector, we disclosed our practices for addressing modern slavery risk through the online self-assessment questionnaire developed by Informed 365 and the PCA. In completing this assessment, we have shared our responses with a selection of organisations that we regularly collaborate and partner with, which can be accessed via the Informed 365 platform at any time. We encourage organisations utilising the Informed 365 platform to engage with us if access to our responses on modern slavery practices supports their respective modern slavery programs.

Sub-consultancy partner agreements

During the year we continued to use our sub-consultancy agreement templates that include contractual provisions aimed at combatting modern slavery. These 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

No changes to these provisions were made during the reporting period, and looking ahead, we will continue to review and update these clauses in accordance with better practice guidance and recommendations.

Grievance reporting mechanisms

In FY2024 we rolled out our Speak Up Platform to all Hassell staff globally. The online platform provides a means for our people to anonymously report any incidents of unsafe or inappropriate behaviour within or outside the workplace, such as alleged instances of harassment, bullying, discrimination, code of ethics breaches, bribery, corruption, environmental incidents, and similar issues. The platform is

also an anonymous whistleblower platform and can 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 recognise opportunities to improve our approach for grievance identification and reporting, and looking ahead, we will consider expanding access to our Speak Up Platform to those in our supply chain. We will also investigate 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.

Training and awareness

This year we completed the design of an online learning module on modern slavery that caters for all staff across our practice, to be completed during our new starter onboarding program. The module has been tailored to our context and needs, helping to foster a common understanding of the issue of modern slavery generally, as well as its presence and implications in the built environment.

The module also outlines Hassell's responsibility to alleviate modern slavery in our sector, providing information on the purpose and actions of our modern slavery risk and reporting program. To support the measurement of the effectiveness of our modern slavery actions, the level of modern slavery awareness is assessed both before and after the module is completed, for each employee enrolled.

Now finalised, the online learning module will be rolled out during FY2025. Looking ahead, we will look to develop tailored modern slavery training resources catering to project and business function employees respectively.

Materials research and selection

We convened a Materials Advisory Group in FY2024 to provide input, review, and oversight into new systems and processes that will support Hassell's material selection, specification, and design practices at a global scale. The culmination of the Materials Advisory Group's work in FY2024 was a Materials

Strategy, which will be implemented in FY2025.

A key aspiration of our Materials Strategy is to have a globally consistent set of parameters (social and environmental) against which products in our materials libraries will be vetted against. The same criteria can be used by designers when researching and reviewing material selections on their projects.

Some of our projects have already developed criteria for assessing modern slavery risk, including:

- Transparent labour practices
- Human rights policies and practices
- Consumer issues policies

- Fair operating practices
- Modern slavery risk indicators
- General equality policies and initiatives

Our next step is to collate leading practices from across our studios and industry, define the minimum criteria to be applied globally, and embed these criteria into the suite of tools and assets we are developing to support our staff to make informed decisions on material selection, specification, and design.

Case study 3 – Materials supplier engagement

We took the opportunity to engage directly with a number of materials suppliers throughout the year on the issue of modern slavery through our design work. This engagement focused on materials with higher indicators of modern slavery risk, with reference to resources such as the Design for Freedom Toolkit (2022).

Our collaborative supplier engagement centred on:

- Sharing information and developments on Hassell's commitment to eradicating modern slavery, and our overarching ambition towards sustainable and regenerative design

- Understanding supplier awareness, capability, and maturity on policies and practices to combat modern slavery, specific to the supplier as well as within their industry more broadly
- Seeking information on the supplier's supply chain, to gain greater visibility and transparency into the provenance of materials, to further our understanding of where these materials come from, who is involved in their extraction and processing, and under what kind of conditions do they work and live.

To date, this form of engagement has been well received and has helped to build and maintain supplier relationships. We look forward to continuing, and expanding, this type of engagement as both our and our suppliers' practices to tackle modern slavery improve and mature.



Human rights program

During the reporting period we continued to monitor developments in human rights due diligence standards and regulations, in particular the human rights and environmental due diligence legislation in the European Union. In addition, we stayed abreast of changing trends and expectations on social and human rights issues, conscious that modern slavery is an issue amongst a broader spectrum of human rights risks and concerns facing business organisations.

We took steps to design the structure of a more holistic program to address the broader spectrum of human rights risks and issues in our operations and value chains. Tailored to our industry and our context, our human rights program is being designed to identify, assess, and respond to human rights risks in four key areas:

- Our studios & our people
- Our direct supply chain
- Our locations of work & our clients
- Our projects

This program will continue to be developed in FY2025, with implementation following thereafter.

Industry engagement

During FY2024 we remained committed to active engagement in industry to continue to build our knowledge and expertise on modern slavery risks and issues. We maintained our involvement with the United Nations Global Compact Network Australia (UNGCA), including as a participant of the Modern Slavery Community of Practice, and regularly attended UNGCA knowledge sharing and capacity building events on business and human rights.

We participated in the UNGCA Dialogue on Business & Human Rights in Melbourne and attended the United Nations Forum on Business and Human Rights in Geneva. These forums provided us with access to diverse experience and expertise on business and human rights issues and developments, including on modern slavery, across a breadth and depth of case studies, research, data, and best practice insights.

Our involvement and engagement helps us to improve our modern slavery risk and reporting program in accordance with the latest developments both nationally and

globally, and guides our approach for developing a comprehensive human rights program.

Academic research engagement

In continuing to contribute to academic research on the issue of modern slavery, we participated in a research study on modern slavery risk management and reporting in Australia's construction industry.

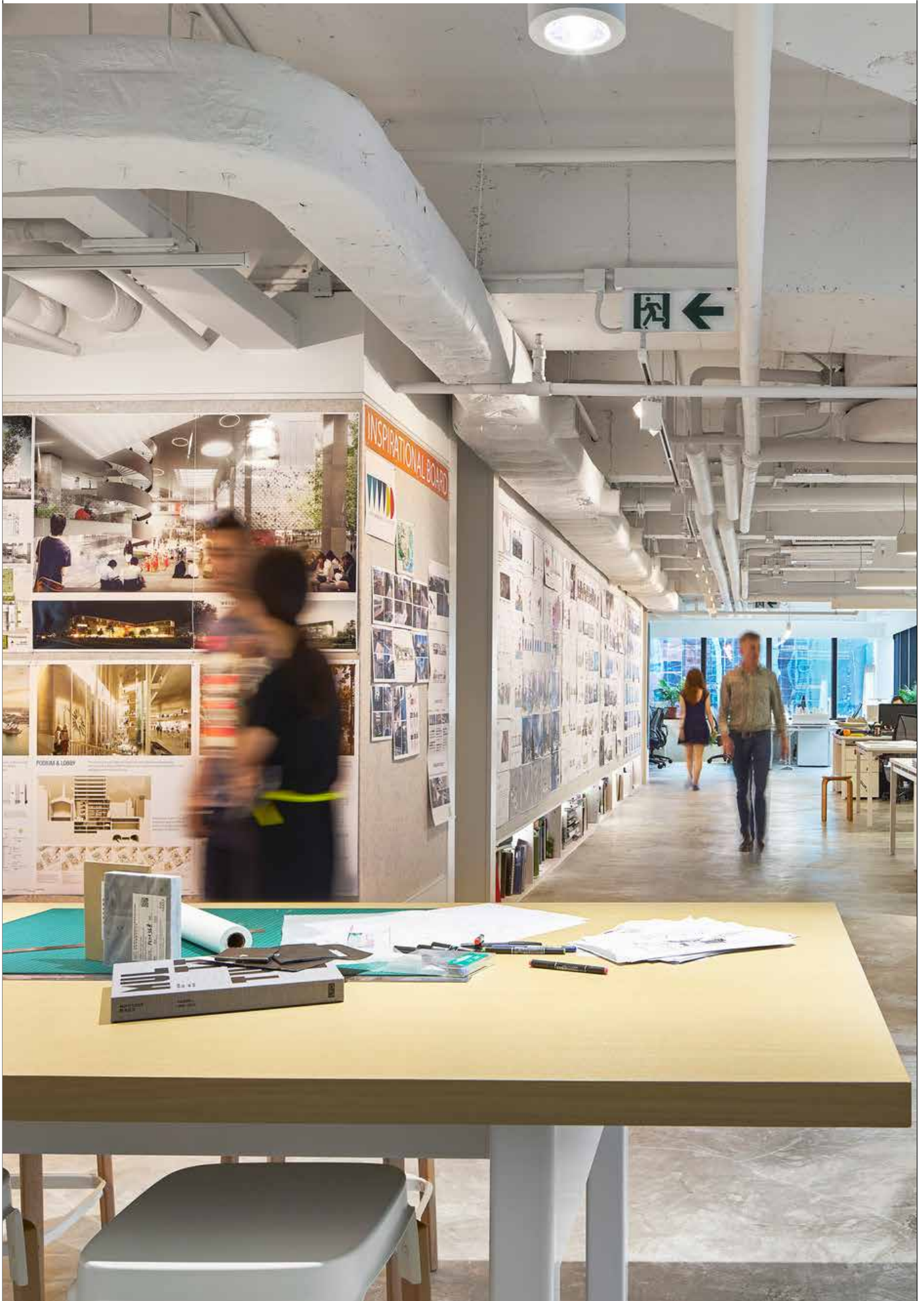
This research project sought to:

- Identify the vulnerable points in Australian construction supply chains that have indicators of higher modern slavery risk
- Highlight the most harmful modern slavery risk areas in Australian construction supply chains
- Prioritise possible mitigation strategies to address risks of modern slavery in the construction sector.

We will continue to contribute to a growing body of knowledge on modern slavery issues in the built environment and will actively support similar research projects as they arise in the future.







ASSESSING EFFECTIVENESS & CONSULTATION

Assessing effectiveness

In FY2024 we continued to develop our approach to measure key performance indicators (KPIs) that monitor the effectiveness of our modern slavery risk and reporting program. Our KPIs are organised into four areas of focus:

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

Quantitative KPI metrics under each of these areas have now been determined, and we continue to monitor our performance against these metrics over time via a modern slavery tracking mechanism. At

present, much of the underlying data is collected and collated manually, and during the period we began to plan how we can transition to an enhanced approach for data analysis and reporting. This will take place as part of our sustainable procurement strategy and alongside broader technology improvements across our practice.

Consultation and engagement

operating entities in these regions. In preparing this Statement we consulted with all Hassell owned or controlled company entities through engagement with the Advisory 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.

Beyond our internal consultation, we have engaged with a selection of the partners, suppliers, and vendors we purchase from, as well as with relevant industry organisations providing updated guidance and resources on best practice modern slavery risk management. Our progress in extending this type of engagement has been outlined in the actions section of this Statement (pages 11 to 15).

LOOKING AHEAD

The following items have been identified as priority actions for the next reporting period:

Priority action	Description
Progress the design and implementation of a human rights program	This year we took our first steps to design the structure of a holistic program to address the broader spectrum of human rights risks and issues in our operations and value chains. This program will continue to be developed in FY2025, with implementation following thereafter.
Review risk management policy and protocols	In responding to changing nature and context of environmental, social, and governance risks locally, nationally, and globally, including modern slavery risks, we will continue the review of our Risk Management Policy and associated protocols.
Implement the ‘specify better’ actions of our materials strategy	The Materials Library stream of our Materials Strategy Implementation Plan will provide designers with necessary tools and assets to assess modern slavery risks as part of the materials specification process. We will develop criteria for vetting products in our materials libraries as well as global specification templates and schedules that reflect these criteria in FY2025.
Implement our sustainable procurement strategy	Designed based on stakeholder need, our sustainable procurement strategy is due to receive executive endorsement in early FY2025 and be implemented across our business functions and studio locations in accordance with our structured roll out program.
Roll out staff training module	Now finalised, our online learning module on modern slavery will be rolled out during FY2025. Initially, the module will be integrated into our new starter onboarding program, then available to all current staff globally. Looking ahead, we will aim to develop tailored modern slavery training resources catering to project and business function employees respectively.
Expand access to grievance reporting platform	With our Speak Up platform now implemented and available to all Hassell staff globally, we will explore opportunities to extend access to the Platform to those in our supply chain.
Improve data management practices	In FY2025 we will set out our requirements for improvements in technology systems and processes for enhanced sustainability data collection, analysis, and reporting. This will include metrics associated with our sustainable procurement strategy and encompass the effectiveness indicators of our modern slavery risk and reporting program.
Continue external engagement	As in previous years, we will continue to be actively engaged with industry bodies and subject matter experts on modern slavery and human rights, including the UNGCNA’s Modern Slavery Community of Practice. We will seek to expand our engagement with other businesses in the built environment, to share knowledge, discuss challenges and opportunities, and explore approaches for ongoing collaboration

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..

Section 16(1): Australian Modern Slavery Act: Mandatory Reporting Criteria	Section 54(5): UK Modern Slavery Act: Reporting Criteria	Page
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	7-15
	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	
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	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	18
	f) The training about slavery and human trafficking available to its staff	13-14
f) Describe the process of consultation with:		18
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		19-20

Studios

Brisbane

Yuggera and Turrbal Country
Level 2, The Ice Cream Factory
45 Mollison Street
West End QLD Australia 4101
T +61 7 3914 4000
E brisbane@hassellstudio.com

Hong Kong

22F, 169 Electric Road
North Point Hong Kong
T +852 2552 9098
E hongkong@hassellstudio.com

London

Level 1
6-14 Underwood Street
London N1 7JQ United Kingdom
T +44 20 7490 7669
E london@hassellstudio.com

Melbourne

Wurundjeri Country
61 Little Collins Street
Melbourne VIC Australia 3000
T +61 3 8102 3000
E melbourne@hassellstudio.com

Perth

Whadjuk Country
Level 1
Commonwealth Bank Building
242 Murray Street
Perth WA Australia 6000
T +61 8 6477 6000
E perth@hassellstudio.com

San Francisco

650 California Street
Level 7
San Francisco CA 94108 United States
T +1 415 860 7067
E sanfrancisco@hassellstudio.com

Shanghai

12F, 45 Caoxi North Road
Xuhui District Shanghai 200030 China
T +8621 5456 3666
E shanghai@hassellstudio.com

Singapore

115 Amoy Street
#03-03 Singapore 069935
T +65 6224 4688
E singapore@hassellstudio.com

Sydney

Gadigal Country
Level 2 Pier 8/9
23 Hickson Road
Sydney NSW Australia 2000
T +61 2 9101 2000
E sydney@hassellstudio.com

Certified



Corporation

© Hassell. This document and the ideas incorporated within, as an instrument of professional service, is the property of Hassell. It shall not be used or reproduced in any manner whatsoever, in whole or in part, or for any other project without the prior permission of Hassell.