



MODERN SLAVERY STATEMENT

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1.0 ABOUT THIS STATEMENT

Architectus' FY2024 Modern Slavery Statement has been prepared in accordance with the reporting requirements of Australia's Modern Slavery Act 2018 (Cth). The statement describes:

- Our company structure, operations, and supply chains;
- Potential risks of modern slavery practices in our operations and supply chains;
- Actions taken to assess and address risks of modern slavery in our operations and supply chains; and
- How we assess the effectiveness of our actions.

This statement is issued on behalf of Architectus Services HoldCo Pty Ltd. It encompasses all entities within the Architectus Group of companies operating in Australia under the trading name Architectus. All entities, including subsidiaries, have since adopted the policies, processes, and procedures concerning modern slavery as outlined in this statement.

Additional details regarding our company structure are available on [page 7](#) of this statement.

The information provided in this statement is correct as at 30 June 2024 unless otherwise noted. This Modern Slavery Statement has been approved by the board of Architectus Services HoldCo Pty Ltd (ABN 31 654 274 629) in its capacity as the governing body of Architectus Australia Pty Ltd and its other related entities on 25 November 2024.

In Accordance with the Act's requirements, persons with authority have examined the contents of this Statement and verified its accuracy.

This statement is signed by Ray Brown in his role as CEO and Director on 25 November 2024.

2.0 A MESSAGE FROM THE CEO

As a practice we are focused on designing inclusive, sustainable, and resilient cities, buildings and spaces where people can thrive.

The way we operate as professionals and collaborate as designers has a significant impact on how we achieve those outcomes, and it is important our approach reflects our commitment to responsible, equitable, and safe ways of working and conducting business.

Now one of Australasia's largest and most diverse design practices, Architectus is operating in an increasingly complex, globally connected marketplace where labour practices can vary significantly. Unfortunately, human rights groups and other organisations tracking these activities are reporting a rise in modern slavery internationally. But what does the term mean?

The Australian Government defines modern slavery as a range of practices including human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, deceptive recruiting for labour or services, and child labour.

We want to do our part to end modern slavery and the range of exploitative labour practices associated with it.

One of the ways we can make a difference is by carefully looking at our supply chains to ensure we do not work with any individuals or businesses that may be propagating modern slavery practices in design, construction or other sectors where Architectus may exchange goods and services.

This is our practice's second Modern Slavery Statement, covering the year ending 30 June 2024. Building on the solid foundations we established last year, we achieved all our committed actions, including the development and rollout of multiple relevant policies. We were also pleased to see a significant increase in our supplier response rates over the previous year.

Looking ahead, we have outlined our future commitments to hold ourselves – and our supply chains – accountable for managing modern slavery risks and continuously improving over time.

By taking these steps, we strive to make the industries we work in better for workers and for society overall.



Ray Brown
Architectus CEO

3.0 STRUCTURE, GOVERNANCE + OPERATIONS

3.1 Introduction

Architectus is one of the largest design practices in Australasia. We strive to make a positive and lasting impact on people, cities, and communities.

Our practice combines deep expertise in every sector with critical problem-solving skills and a commitment to exceptional design. Through our collaborative ethos and insightful, human-centric approach, we create design outcomes that exemplify elegance, functionality, and sustainability.

We combine deep expertise in architecture, interior architecture, landscape architecture, and urban design and planning services for both public and private sectors.

Our design services span various sectors including education and research, public, rail, aviation, infrastructure, defence, health and science, heritage, urban futures, commercial, and living.

We describe our design philosophy in the shorthand of 5Ps: people, place, purpose, planet, and production. This is our framework for creating, discussing, and assessing our design.

As a unified force, we have over 620 talented designers and specialists working across nine Australian studios plus three affiliated New Zealand studios.



3.0 Structure, Governance and Operations

3.2 Structure

This statement is made on behalf of Architectus Services HoldCo Pty Ltd, the ultimate holding company and its associated entities (Architectus).

This statement reports solely on Architectus Australia for the FY2024 period and does not include Architectus Aotearoa (New Zealand), a partially owned subsidiary.

The company structure is typical of a privately-owned services company where the Australian contracting entity, Architectus Australia Pty Ltd, is a subsidiary of the ultimate holding company.

3.3 Governance

Architectus is governed by a Board made up of both executive directors and non-executive directors. The Board presides over the Executive, Client, Operational, Delivery and Design Management Groups, a company structure that institutes best practice across all aspects of operations.

An Executive Management Group of several senior leaders regularly identifies, evaluates, and responds to key strategic, operational, and other risks in our practice.

The AMS Compliance Group (ACG) and the Design Excellence Group (DEG) oversee and report on a range of risk and audit activities ensuring ongoing compliance with our management systems and legislation. The Health, Safety & Environment (HSE) Group ensures a safe working environment is provided through consultation, risk reviews and workplace inspections.

3.4 Operations

Our practice has studios in Adelaide, Brisbane, Canberra, Gold Coast, Melbourne, Perth, Sydney, and Townsville. We also have a strong relationship with our associated New Zealand studios in Auckland, Christchurch, Wellington and Tauranga.

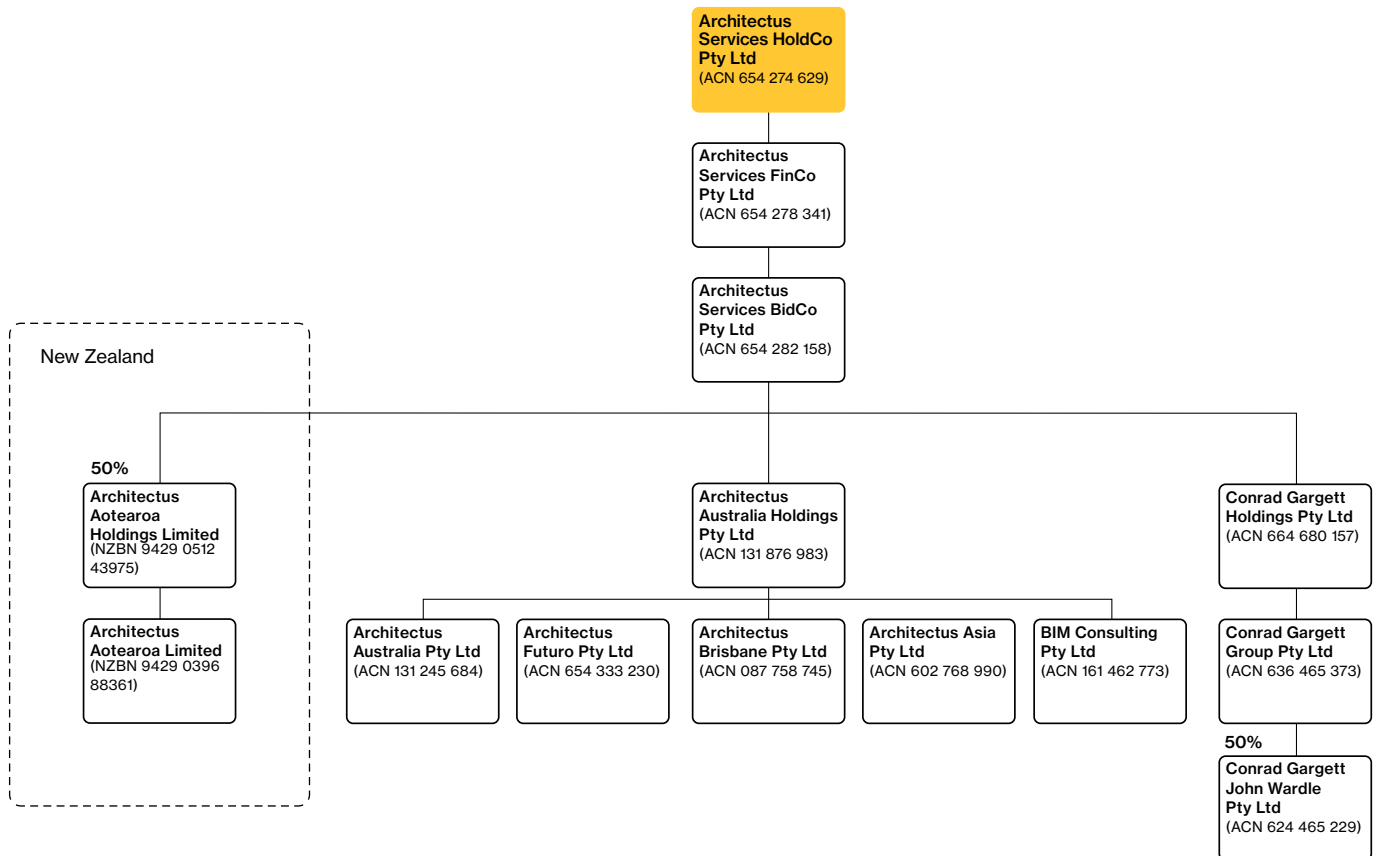


Diagram 1
Architectus Group Structure



4.0 POLICIES + PROCEDURES

4.1 Policies and Procedures

Architectus has various policies and procedures in place which reinforce our commitment to tackling modern slavery and apply to all operations. These consist of policies on workplace and health, safety, the environment, and quality (HSEQ) as well as management procedures which respond to modern slavery risks that may arise.

All employees are required to read these policies and associated procedures and guidelines as part of our new starter 'onboarding' process. These policies are also available to all staff on our intranet.

Workplace policies

We have policies addressing equal opportunity, the identification and prevention of workplace bullying, the resolution of workplace issues, the promotion of inclusivity and diversity, as well as accessibility to support and leave when escaping or recovering from Family and Domestic Violence. These policies collectively aim to fulfill our responsibilities and obligations to provide a safe and equitable workplace. They also govern our standards of appropriate workplace behaviour.

Whistleblower Policy

This policy acts as a framework for receiving, investigating, and addressing allegations of improper conduct and the management of those involved.

Competition Law Policy

This policy clarifies our fundamental obligations and compliance requirements related to competition law, and governs how we interact with competitors, customers, and our supply chains. Additionally, Competition Law Compliance training is provided to all senior staff, annually.

Human Rights Policy

This Policy outlines our commitment to respect, protect, and promote human rights in all aspects of our operations and interactions with stakeholders, including employees, clients, contractors, suppliers, and the communities in which we operate.

Anti-Bribery and Corruption Policy

The purpose of this Policy is to set out the responsibilities of Architectus and those working for us, in observing and upholding our zero-tolerance position on bribery and corruption. It also exists to act as a source of information and guidance for those working for Architectus, helping them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

Supplier Code of Conduct

This Code sets out our expectations for suppliers to conduct themselves with high standards of ethics. Where appropriate, it also mandates requirements to ensure we conduct business together in a safe, accountable, and equitable manner.

The Code unequivocally condemns all forms of modern slavery, including forced labour, child labour, human trafficking, and debt bondage. We maintain a zero-tolerance approach towards these practices in our operations and supply chain. In line with our Modern Slavery Statement, we expect our suppliers to take proactive and effective actions to identify and address any modern slavery risks in their operations and supply chains.

Health, safety, environment and quality policies

We have policies addressing our commitment to providing professional, ethical, and socially responsible services, ensuring a safe working environment free from health risks, and managing environmental impacts during procurement and supplier/sub-contractor engagement processes. Together with our HSEQ objectives, these serve as measurable benchmarks for achieving company aims in health, safety, environment, and quality.

Management System Procedures

Our Management Procedures are key to operating our business and delivering our projects in a responsible and compliant manner. They support the company to achieve its objectives, manage its business operations, and safeguard compliance.

The Management Procedures also extend to our supply chain in meeting the needs and expectations of Architectus and our clients. This includes how any issues related to performance and behaviour are raised and addressed. The procedures also provide guidance to our employees, clients and suppliers about raising any concerns so they can be addressed by the appropriate Management Representative in a timely manner.



5.0 SUPPLY CHAIN

During the current reporting period, Architectus maintains contracts with more than 300 key direct suppliers and subcontractors spanning various sectors and industries. A significant portion of the goods and services procured from these entities directly supports the professional services Architectus delivers to clients.

The services primarily involve individuals engaged in our project work. Subcontracted services mainly consist of engineering, architecture, and other specialist services. The majority of these suppliers are Australian-based entities, varying from large multinational engineering firms to smaller Australian-based entities and individuals, including sole practitioners. Consequently, these services are considered low risk, as Australia, at a country level, has a low inherent risk of modern slavery.

Architectus is actively taking measures to mitigate modern slavery risks within our business and supply chains. This includes the recent implementation of our Supplier Code of Conduct policy and the development of a supply chain consultation process to evaluate standards of quality, integrity, and corporate social responsibility in both service delivery and our supply chains. The planned supplier assessment, currently in development, will be mandatory before any initial engagement can take place.

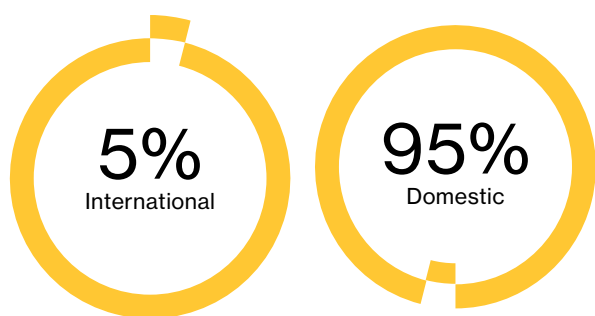


Diagram 2
FY2024 Supply Chain

Supply Chain Internationally

Location	Services	Percentage
Dubai, U.A.E	Professional Services	0.30
Italy	Professional Services	0.30
Netherlands	Property + Operations	0.30
New Zealand	Property + Operations IT + Technology	0.60
Papua New Guinea	Subcontracted Services	0.30
Singapore	Human Resources	0.30
Spain	Subcontracted Services IT + Technology	0.60
UK	Professional Services IT + Technology	0.91
USA	Professional Services IT + Technology	0.60
Vietnam	IT + Technology	0.30

5.0 Supply Chain

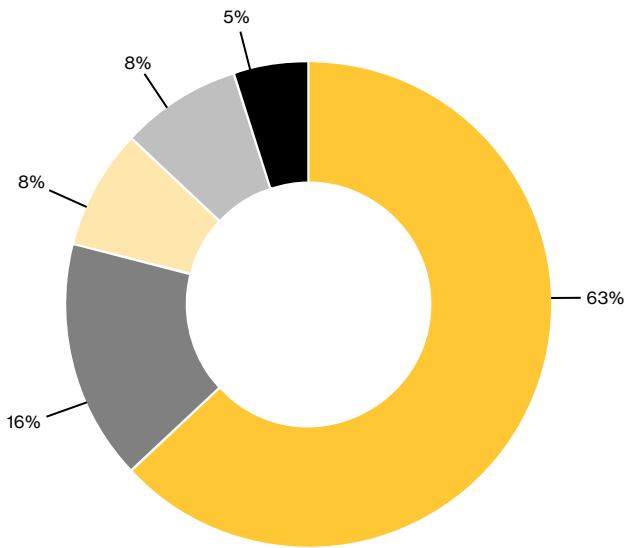


Diagram 3
Total FY2024 supply chain spend by category

Legend

- Subcontracted Services
- Professional Services
- Property Operations
- Human Resources
- IT & Technology

The International Labor Organisation estimates that 50 million people around the world are victims of modern slavery. In recent years, supply chain transparency is a key policy strategy used by governments to identify and prevent business practices that lead to modern slavery.

Among all of Architectus' suppliers, less than 1% are situated in countries identified as having a high risk of modern slavery, including United Arab Emirates, and Papua New Guinea.

However, within this subset, 100% of these suppliers offer professional sub-consultancy services, which are classified as low risk.

Legend

- Teir 1
- Tier 2
- Tier 2WL
- Tier 3
- Uncategorised
- N/A

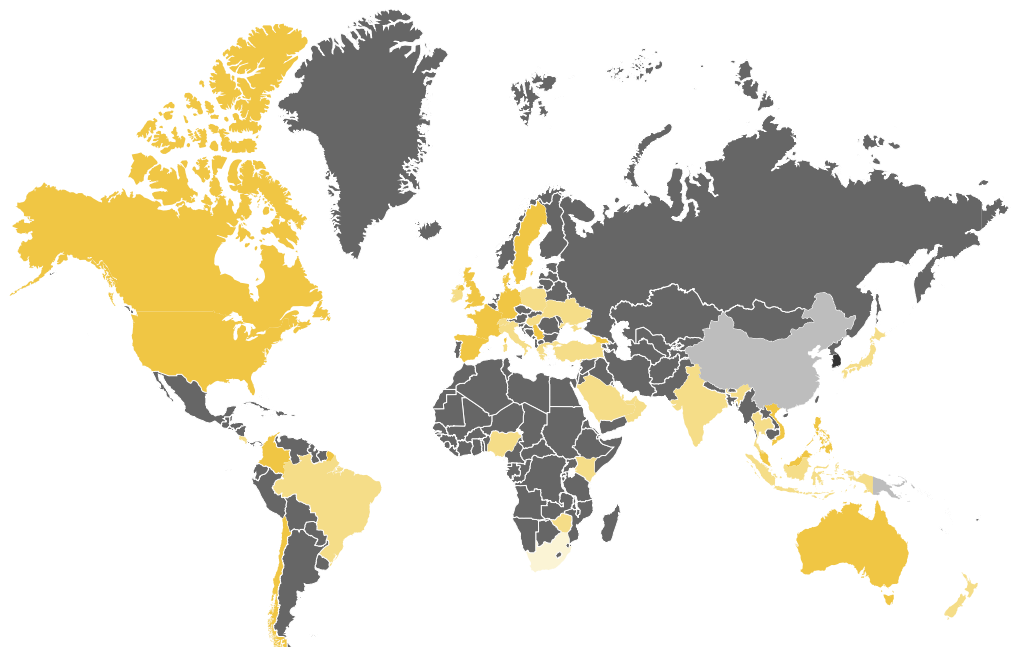


Diagram 4
Supply Chain – Countries of Operation
Source: Tier definitions sourced from The Trafficking in Persons Report

5.1 Risks of Modern Slavery practices

We continue to work alongside external subject matter experts to carry out a modern slavery risk assessment of our supply chains and operations, including requesting all key suppliers to complete an online self-assessment form.

For the purposes of this statement, we have reviewed the responses from suppliers of goods and services during the reporting period. These respondents represent over 67% of our FY2024 supply chain supporting the operation of our practice.

The risk assessment concluded that most of the services supplied to Architectus were provided by Australian companies and, consequently, considered low risk. (At a country level, Australia has a low inherent risk of modern slavery). In addition, we did not identify any actual or suspected cases of modern slavery in our operations or supply chains.

Architectus' suppliers operate, produce, and source across several industries. Some of these industries can be described as high risk. Our identified industries with elevated risks for modern slavery include construction, accommodation and food service activities, retail, and manufacturing. To mitigate these risks, all these services are presently provided by Australian entities. Suppliers operating in countries with governments not fully meeting (or making significant efforts to reach) the minimum standards outlined in the Trafficking Victims Protection Act (TVPA) include China, Cambodia, Macau, and Papua New Guinea. These comprise less than 5% of our suppliers. It is worth noting that all these suppliers offer professional and scientific services, which are categorised as low risk.

5.0 Supply Chain

5.2 Actions Taken

Architectus is devoted to ongoing improvement in addressing modern slavery. Throughout the reporting period, we have acted on our commitments and introduced further due diligence measures and initiatives, as detailed below.

<p>Education and training</p>	<p>We have implemented a comprehensive training program for all our business leaders responsible for procurement and recruitment. The training covers Australia-wide modern slavery laws, prevention strategies, and measures to eliminate modern slavery from our supply chains.</p> <p>We achieved a 100% completion rate from our leaders and have established an ongoing training plan to ensure that modern slavery awareness is included in the onboarding process for new hires.</p>
<p>Policies and documents</p>	<p>We created and introduced new policies to articulate Architectus' commitment to combating modern slavery.</p>
<p>Human Rights Policy</p>	<p>This new policy applies to all Architectus employees and commits to respecting, protecting, and promoting human rights in all aspects of our operations and interactions with stakeholders, including employees, clients, contractors, suppliers, and the communities in which we operate.</p>
<p>Anti-Bribery and Corruption Policy</p>	<p>This new policy applies to all Architectus employees and sets out the responsibilities of employees and those working for us in observing and upholding our zero-tolerance position on bribery and corruption. It also serves as a source of information and guidance for dealing with these issues and understanding responsibilities.</p> <p>In alignment with this policy, Architectus also implemented a Gifts and Hospitality register. This practice ensures we are upholding our zero-tolerance position on bribery and corruption. By documenting these exchanges, we demonstrate our commitment to conducting business in an ethical and honest manner. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever we operate.</p>

<p>Supplier Code of Conduct Policy</p>	<p>The code sets forth our commitment to upholding the highest standards of ethical conduct in all our business dealings. It sets out our expectations for suppliers to conduct themselves with high standards of ethics. Where appropriate, it also mandates requirements to ensure we conduct business together in a safe, accountable, and equitable manner.</p> <p>The Code unequivocally condemns all forms of modern slavery, including forced labour, child labour, human trafficking, and debt bondage. We maintain a zero-tolerance approach towards these practices in our operations and supply chain.</p>
<p>Subconsultant Engagement agreement</p>	<p>Subconsultants make up a key part of our supplier base as such we have updated our subconsultant agreement templates to include specific provisions addressing modern slavery risks. The agreements also require compliance with Architectus' Supplier Code of Conduct.</p> <p>We reviewed our business policies for alignment with the newly implemented policies and raised awareness within the company about the policies and associated procedures.</p> <p>In addition to the above policies and procedures Architectus has begun developing and implementing a supply chain consultation process to assess the standards of quality, integrity, and corporate social responsibility in our service delivery and supply chain.</p> <p>We have reviewed and redesigned our supplier engagement process which requests our suppliers to complete a modern slavery risk assessment and share our Supplier Code of Conduct policy prior to engagement.</p> <p>Once implemented, all future suppliers will be reviewed and verified before a supplier is added to our Acceptable Supplier Register.</p>

5.0 Supply Chain

Supplier Engagement	<p>To enhance supplier participation in the online modern slavery risk assessments, we collaborated with external subject matter experts to monitor, review, and improve the effectiveness of our engagement. As a result, supplier participation increased from 45% to 67% compared to the previous reporting period.</p> <p>We evaluated the assessment outcomes of suppliers from the previous reporting period who were identified as having the highest relative risk of modern slavery in their supply chains. Working closely with them, we identified improvement areas and provided corrective action plans aimed at reducing their modern slavery risks, focusing on training, policy development, and filling gaps in information.</p> <p>We observed that most of the entities scoring high on modern slavery risks were not mandated to report under the Act. These were predominantly small businesses lacking internal frameworks to address such risks. However, we successfully collaborated with some of our larger suppliers to reduce their risk score from high to medium and will continue to work with all our suppliers to enhance their awareness of modern slavery risks.</p>
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5.0 Supply Chain

5.3 Our commitment to action

We will continue to use the results and insights of the modern slavery risk assessment survey to inform our responses and actions in addressing modern slavery risks beyond the current reporting period.

Modern slavery risk mitigation training	We will expand the scope of our training program to be accessible to all senior leaders within the business end review content for the annual refresher training to ensure it is current and relevant.
Policies and procedures	Alongside the Human Rights, Anti-Bribery and Corruption, and Supplier Code of Conduct policies introduced in alignment with our commitments in our previous statement, we will continue to review our policies and documentation to identify opportunities for incorporating specific provisions that address modern slavery risks. As part of this effort, we will: <ul style="list-style-type: none">– develop a recruitment and selection policy.– develop a performance and conduct policy for employees.– develop procedures for how to deal with goods and services tainted by modern slavery, should this arise.– provide Human Rights training to senior management.

Supplier Code of Conduct Policy	We are committed to further develop our supplier engagement processes to incorporate Modern Slavery obligations and indicators as part of the on-boarding and continuing monitoring process of our supply chain. We are currently investigating software options to automate our supplier qualification process. Modern Slavery risk assessments will form part of this procurement process, along with acknowledgement of our supplier code of conduct.
High risk supply chain respondents review	We will continue to carry out comprehensive risk assessments, prioritizing suppliers identified as having the highest relative risk of modern slavery within their own supply chains. The results of these assessments will guide the development of progressive improvement programs with these suppliers, ensuring that high-risk suppliers are actively monitored and consistently working towards meeting modern slavery obligations.

5.0 Supply Chain

5.4 Approach to assessing effectiveness

We remain dedicated to the ongoing enhancement of our processes and activities that assess modern slavery risks within our operations and supply chains. This commitment was evident in the previous financial year through the implementation of improved supplier engagement practices.

By holding ourselves accountable to the actions outlined in this statement, we aim to foster both a cultural mindset and everyday practices that help our staff recognise any potential areas of concern and address them thoughtfully and efficiently. Learning from experience and feedback during our due diligence processes to improve the processes and results in the future.

An annual review of our relevant policies will be conducted to ensure compliance with the latest regulatory requirements and that the definitions of high-risk countries remain current.

Architectus have developed key performance indicators (KPIs) to measure the effectiveness of our actions for subsequent reporting periods.

We are dedicated to collaborating with our suppliers to eradicate modern slavery in the workforce and will continuously monitor any high-risk supplier for measurable and consistent improvements in meeting modern slavery obligations.

We will continue to evaluate, enhance, and strengthen the effectiveness of our modern slavery risk processes, leveraging the insights we've gathered over the past two years.

People	<ul style="list-style-type: none">– Achieve a 100% completion rate for modern slavery training among senior leaders.– Provide human rights training for all senior management.– Target zero modern slavery complaints through the grievance mechanism.
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Suppliers	<ul style="list-style-type: none">– Ensure 100% of new suppliers receive the Architectus supplier code of conduct and modern slavery questionnaire during the onboarding process.– Achieve a 65% completion rate on the annual Modern Slavery questionnaire from active suppliers.– Investigate and assess 100% of all high-risk respondents identified in the Modern Slavery questionnaire.
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