

Hassell

**MODERN SLAVERY
TRANSPARENCY
STATEMENT**

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1.	About Hassell, our operations and supply chains	1
2.	Modern Slavery risk assessment	3
3.	Actions taken	5
4.	Assessing effectiveness	7
5.	Consultation	9
6.	Other relevant information	11

ABOUT HASSELL, OUR OPERATIONS AND SUPPLY CHAINS

Hassell is a leading international design practice with studios in Australia, China, South East Asia, the United Kingdom and the United States of America. As at the end of the June 2022 reporting period we had 534 employees in Australia and 210 located outside Australia.

Hassell operates in Australia through Hassell Ltd (ABN 24 007 711 435), an unlisted public company and our Australian trading entity, which is the reporting entity for the purposes of the Australian Modern Slavery legislation. Hassell Ltd is owned by the Australian parent company, Hassell Australia Ltd. In other jurisdictions we operate local subsidiary companies of Hassell International Ltd, also an Australian unlisted public company. In the United Kingdom this is Hassell Ltd (Company No: 7545819).

We are committed to high standards of ethical conduct and operate our business in full compliance with all international laws and regulations. We believe in supporting a more transparent supply chain to combat all forms of modern slavery globally, respecting the rights of all who work for, with and in connection with us.

Policies and Procedures

Hassell has various policies in place including a Code of Ethics which includes a statement on Human Rights. In addition, we have policies addressing Equal Opportunity, prevention of Bullying, Discrimination and Harassment. A Whistleblower Protection policy also exists to encourage employees to speak up if they see any misconduct.

A Board of Management oversees our Operations across the practice and is supported by committees and local leadership in each of the sectors in which we operate. The Board has a Risk and Audit Committee to oversee risk and compliance reporting.

The Risk Committee of the Board of Management was established to, amongst other tasks, assess and consider risks associated with any

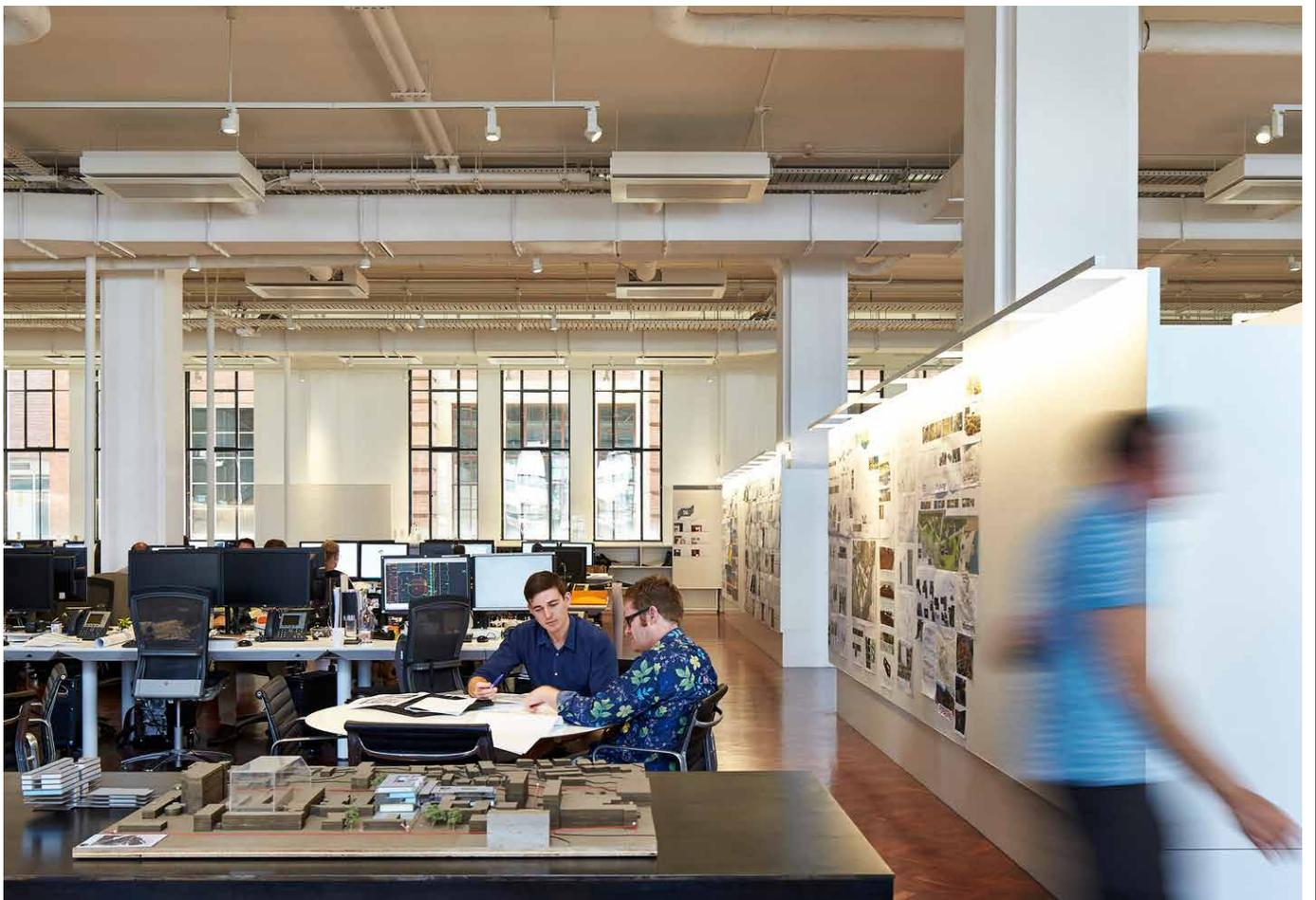
new projects being considered in countries outside our immediate countries of operation. This would include assessing projects that may be in countries identified in the Global Slavery Index and therefore may present higher risks in the local supply chain.

Supply Chains

Our supply chains within Australia and internationally comprise predominantly of other professional design firms who may be engaged as sub-consultants on our project work. These suppliers after excluding staff salaries in 2022 accounted for approximately 62% of our total supply chain. The remainder comprises various suppliers required as part of our design process (1%) and normal business operations (37%).

Our Operations

Within our core business our staff and consultants are our main suppliers. We comply with all applicable labour laws and 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 survey.



MODERN SLAVERY RISK ASSESSMENT

In preparing our Modern Slavery Statement, we have used the guidance of KPMG and the Australian Human Rights Commission published in their report "[Property, Construction and Modern Slavery. Practical Responses for Managing Risk to People](#)" (2020).

Considering KPMG and AHRC's key modern slavery risk factors (refer diagram), we have further developed our response to the requirements of similar UK legislation to identify modern slavery risks throughout Hassell's global supply chain. Our process considered the type of good or service, the nature of the supplier company, geographical location, and Hassell's expenditure with that supplier in the foregoing year.

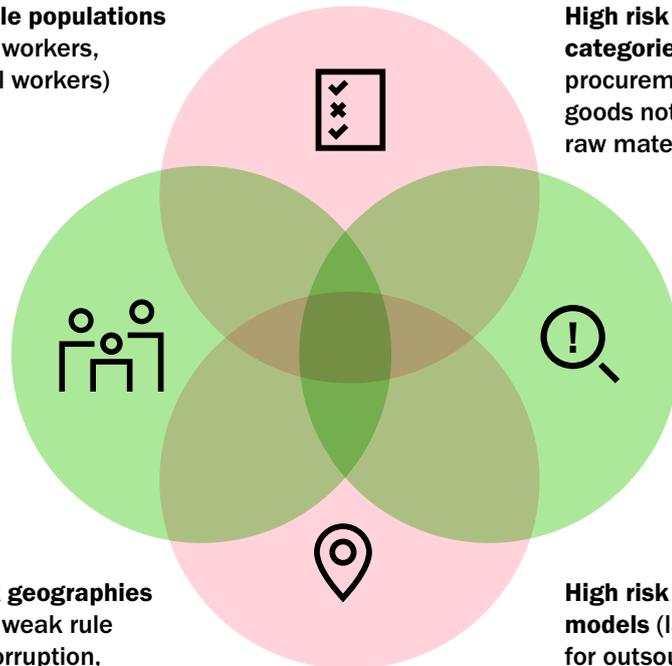
Diagram – KPMG / AHRC Key Risk Factors in Property & Construction

- 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).

Diagram – KPMG / AHRC Key Risk Factors in Property & Construction

Vulnerable populations
(migrant workers, base skill workers)

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

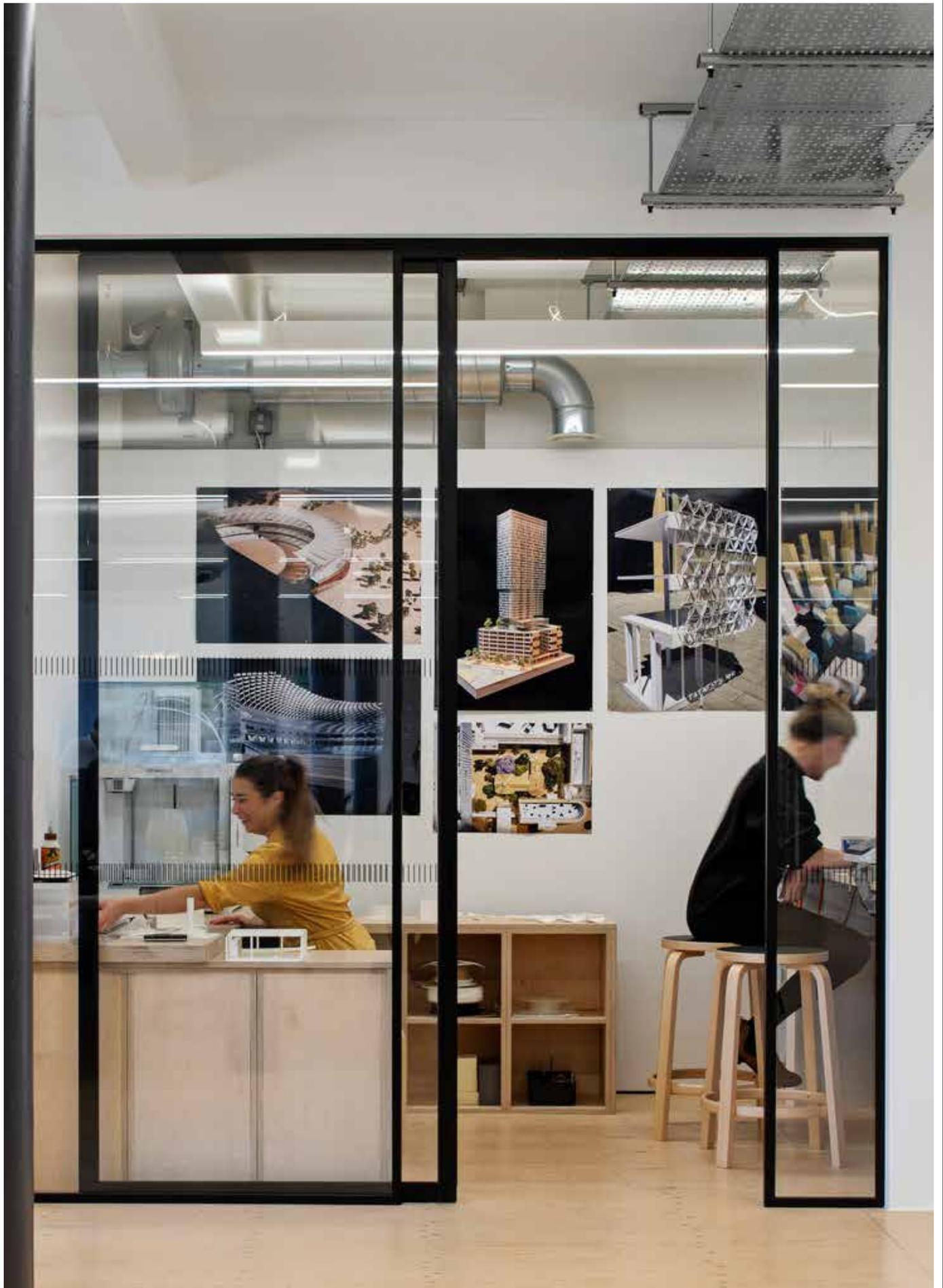


High risk geographies
(conflict, weak rule of law, corruption, state failure to protect human rights)

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

Through this process we have identified a number of risk areas that warrant further action on our part, including higher risk supplier categories (for example, local cleaning services providers and local and global digital and IT products and services), higher risk geographies (for example, parts of the wider

Asian region subject to weak human rights and worker protections), and potentially high 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).



ACTIONS TAKEN

Having identified our high-risk suppliers, we completed a desktop due diligence exercise on a representative sample of those suppliers, including:

- searching the Modern Slavery Statement Register for published statements
- internet and supplier website searches to assess suppliers' current status vis-à-vis Statement publication here or in other jurisdictions
- distributing supplier questionnaires to directly engage with suppliers to review their practices more specifically, where no other information was publicly available.

Our investigations revealed that the overall risk of slavery and human trafficking in our supply chain is low, mainly due to the large portion of professional services providers within the chain, most of which are large, reputable local or international companies employing highly skilled, knowledge-economy professionals, within jurisdictions with strong employment relations systems in

place. Many of these suppliers are also required to comply with Modern Slavery legislation and have their own published statements.

Establishment of Modern Slavery Working Group

As noted below, the impacts of Covid-19 delayed some of our planned improvements in this area however we established a Working Group from across the practice, including members from each of our regions to further review and expand on our due diligence process.

The Working Group has assisted with above due diligence and reviewing how these can be further developed in coming reporting periods.

As members of the group changed, we replaced to maintain representation across our regions.

Sub-consultancy partners

Given the predominance of professional services providers within our supply chain, we determined that one of the highest-impact actions we could take was to update our sub-consultancy agreements to include contractual provisions aimed at

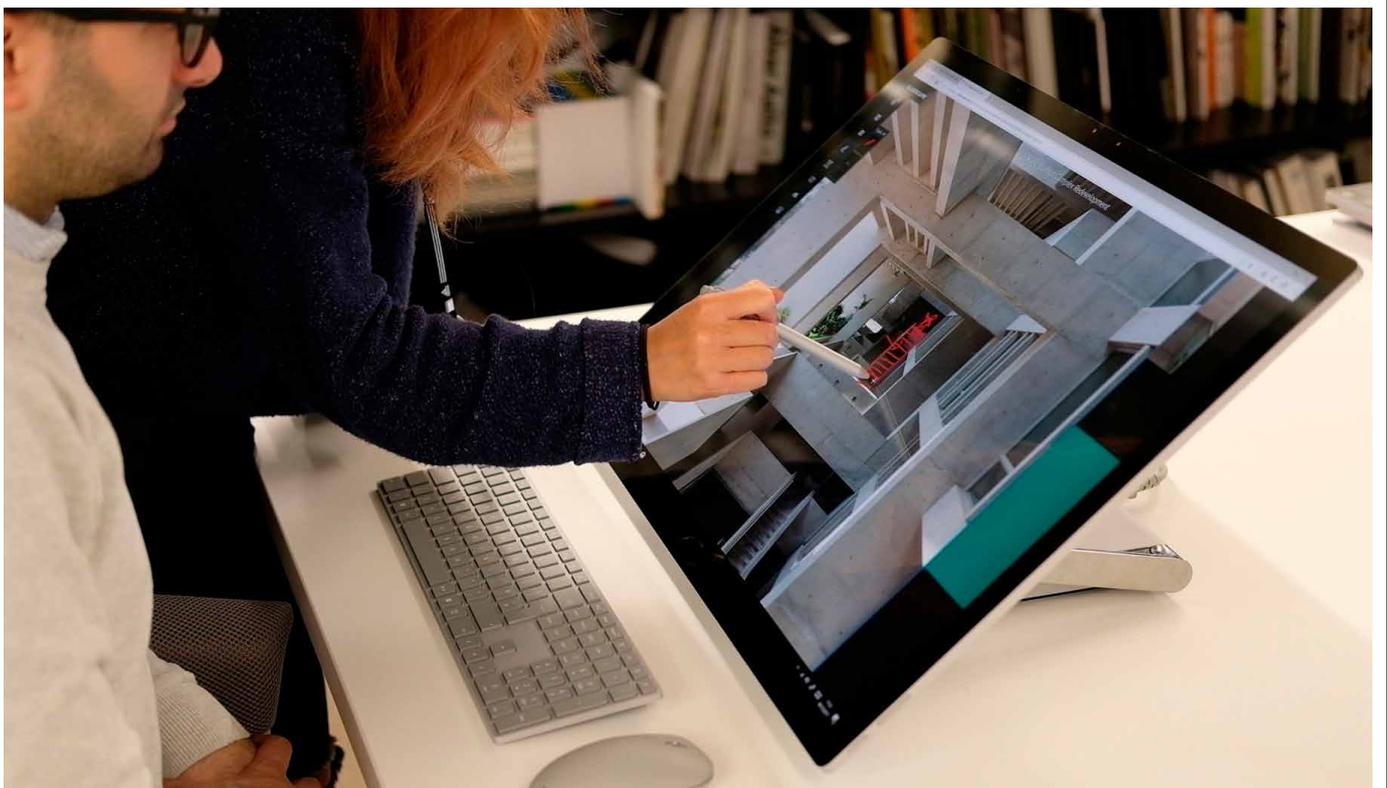
combatting Modern Slavery within our supply chain. Our sub-consultants are now required to provide details of their supply chain to enable us to comply with our own obligations. The working group will review how this may be expanded upon further.

Training

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

The Working Group developed a presentation that was delivered in our Melbourne studio, recorded and made available to other staff via a required training module in our online learning platform.

We recently moved to a new internal learning platform which includes access to additional material on Modern Slavery.



ASSESSING EFFECTIVENESS

Our due diligence to date has not identified any evidence of modern slavery in our supply chain.

We continue to assess our suppliers, particularly those in higher risk areas. This year we sent an increased number of questionnaires to those suppliers who do not publish their own Modern Slavery statements.

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.

Accordingly in sending additional questionnaires this year, we have used resources of The Mekong Club to provide information so as to increase awareness across our suppliers.





CONSULTATION

As noted, our Working Group includes representatives from each of our regions and operating entities in these regions. Those representatives have consulted wider amongst the local businesses in conducting the outlined due diligence. Our consultation has included representatives from our finance, legal, business support and professional disciplines.

We were recently advised that the Products and Materials Library that had been in development by the Australian Institute of Architects has not been proceeded with.

Accordingly, we are investigating further our own procedures around onboarding of suppliers but also how that may be extended to suppliers of products we specify in our projects.





HONG KONG

SAN FRANCISCO

HONG KONG

BRISBANE

SYDNEY

MELBOURNE

OTHER RELEVANT INFORMATION

Hassell is a member of the UN Global Compact that supports companies to do business responsibly by applying principles on human rights, labour, environment and anti-corruption.

Impact of Covid-19 Pandemic

During the reporting period we continued to experience impacts of Covid-19 with lock downs and restrictions, particularly in our Asian studios meant further periods of remote and home based working at times during the year.

Priorities for the 2023 reporting period

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

Procurement

As noted above, we have looked to improve the awareness amongst our supply chain by use of reference material from The Mekong Club and provide some training material for them to consider their own supply chain and Modern Slavery awareness.

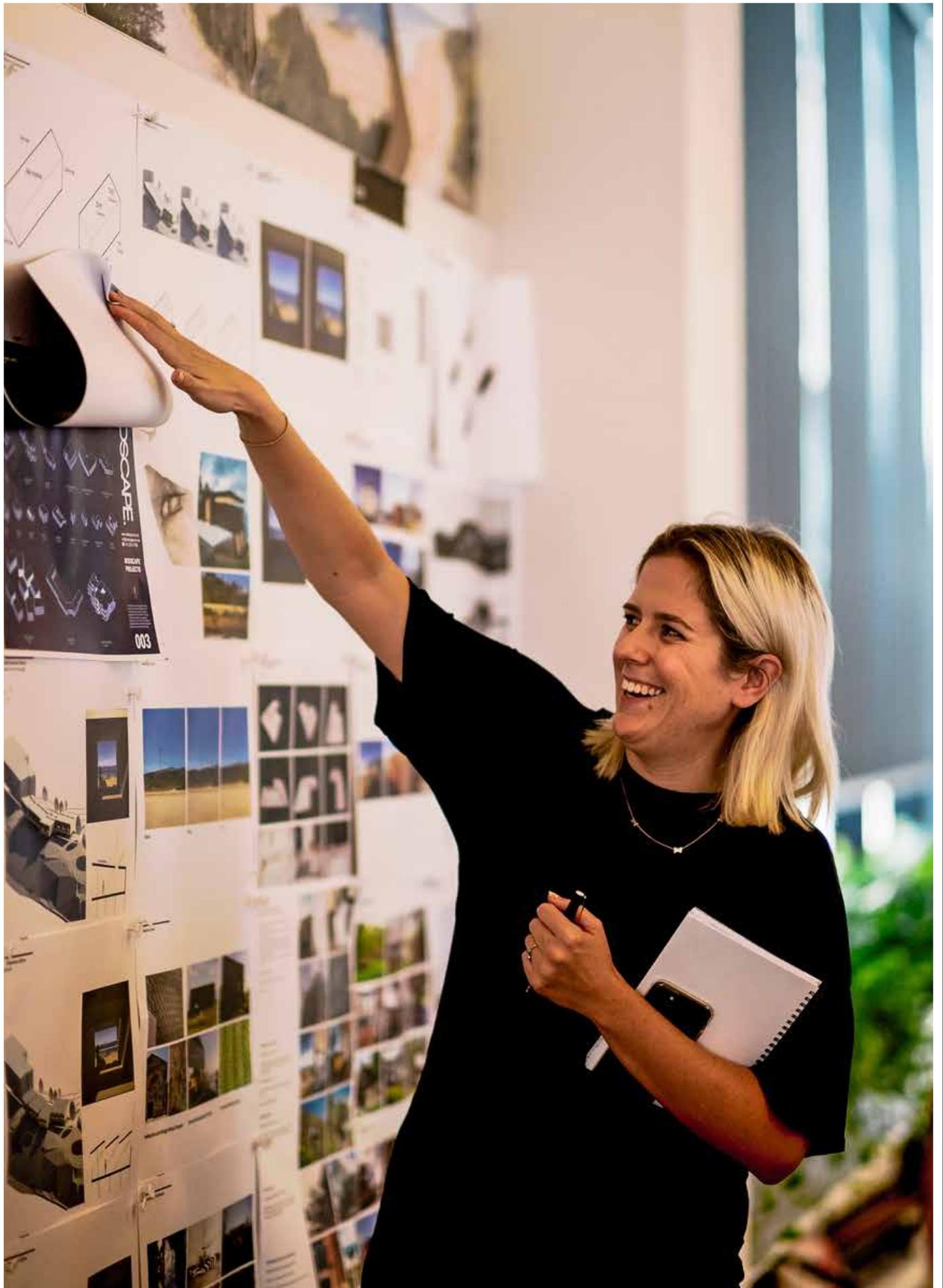
We will also seek to review how we can engage with suppliers of products and materials specified in our projects, that in due course become part of our client's and builder's supply chains.

This is a statement approved by the Hassell Board in accordance with s 54(1) of the Modern Slavery Act 2015 (UK) and s14(1) of the Australian Modern Slavery Act 2018 for the year ended 30 June 2022.

The Board of Management of the Hassell group including the Directors of the reporting entity have considered and approved this statement and authorised it to be signed by the Managing Director.



Robert Backhouse
Managing Director



MANDATORY CRITERIA

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in Section 16 of the Act.

Mandatory criteria	Page number/s
a) Identify the reporting entity	1
b) Describe the reporting entity's structure, operations and supply chains	1
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	3
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	5
e) Describe how the reporting entity assesses the effectiveness of these actions.	7
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	9
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	11

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