



URBIS

URBIS GROUP MODERN SLAVERY STATEMENT

UNDER THE MODERN
SLAVERY ACT 2018
(CTH)

1 JULY 2022– 30 JUNE 2023

This Modern Slavery Statement was approved by the board of **Urbis Ltd (ABN 50 105 256 228)** in its capacity as the principal governing body of Urbis Ltd on **18th December 2023**.

Pursuant to the requirements of the *Modern Slavery Act 2018 (Cth)*, authorised persons have reviewed the contents of this Statement and confirmed its accuracy.

This statement is signed by James Tuma in his role as Director on **18th December 2023**.

A handwritten signature in black ink that reads "James Tuma". The signature is written in a cursive, slightly stylized font. There is a small dot at the end of the signature, possibly a period or a flourish. The signature is positioned above a horizontal line.

James Tuma
Director & Managing Partner, Urbis

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01

REPORTING REQUIREMENTS #1 & 2:

The reporting entity and our structure, operations, and supply chains.

Urbis Ltd (ABN 50 105 256 228), formerly named 'Urbis Pty Ltd' and referred to throughout this Statement as 'Urbis', 'we' and 'our', is the reporting entity covered by this Statement. This is our fourth modern slavery statement and covers the 2022-2023 Australian financial year.

Urbis works to shape cities and communities for a better future. Urbis' core business comprises the provision of a wide range of professional services and advice relating to:



urban planning and design



landscape architecture



property economics, valuations, transactions and management



strategic advisory



social planning and public policy



heritage & archaeology

OUR STRUCTURE

Urbis' corporate structure remains as described in previous statements with the Board of Directors for Urbis as the principal governing body. This Statement covers the operations and supply chains of Urbis and, unless noted otherwise, the ten (10) wholly owned and controlled entities that make up the Urbis Group, some of which are not operating and all of which are not themselves individual reporting entities. A complete list of these entities is set out in the **Appendix 1** to this Statement.

OUR OPERATIONS AND SUPPLY CHAINS

Urbis is an Australian-based organisation with offices in Brisbane, the Gold Coast, Sydney, Parramatta, Melbourne, Geelong and Perth.

Our international business is conducted under the trading name Cistri through the Cistri Group of companies and is based out of our Singapore office. Through Cistri, our international professional advisory services offering now extends to include markets in Asia and the Middle East (Gulf Region).

The core characteristics of our service offering, operations and supply chains remain consistent with previous statements with no material changes impacting our modern slavery risk profile. We completed one small business acquisition during the reporting period, but it had no material impact on our service offering or our overall modern slavery risk profile. With our day-to-day operations and established supply chains remaining consistent, we continue to maintain an assessment of our overall modern slavery risk profile, in relative terms, as low.

The Urbis team was comprised of a total of **827 employees** for the reporting period, which represented an increase of more than 15% when compared with the number (715) for the 2021/22 financial year.

As with previous years, Urbis continues to engage a small number of contracted workers for discrete technical and highly skilled roles, such as assisting with internal IT services. These contracted staff are employed via direct engagement contracts with Urbis. We do not consider this workforce characteristic presents any specific modern slavery risk in our operations.

The Urbis group continues to assist a broad spectrum of clients (property developers, owners and investors, private and public companies, NGO's, community groups, industry associates and all levels of government), with a wide range of professional advisory services including:

- Strategic advice to assist our clients in imagining and building places of work, leisure, entertainment and commerce such as shopping malls, business parks and retirement living
- Consulting and engaging with communities
- Urban design and master planning
- Guiding development projects through the complex process for gaining planning approval
- Landscape architectural advice
- Providing economic analysis on the property market
- Evaluating urban policy and advising on strategic visions
- Providing heritage advice
- Researching and analysing market forces and shopping trends
- Valuing properties, property management, advising on property transactions and associated property investment management.
- Advising on a broad range of government-led social and economic programs and initiatives, including initiatives external to the property sector.

OUR SUPPLY CHAINS

Urbis engaged with 913 direct (first tier) suppliers during the reporting period. Consistent with our overall business growth, this represented an increase from the previous reporting period of almost 20%.

More specifically, we attribute this increase in total supplier numbers as reflective of the higher number of sub-consultant advisors we partnered with to complete client work. The reporting period also featured several internal business development projects, which involved the engagement of some additional service providers.

Overall, given the increase in supplier numbers across reporting periods did not involve a significant change in the types of core supplier industry categories with which we engaged, we consider the nature and extent of the previously identified areas of modern slavery risk remains consistent.

Our core suppliers remain spread across the following industry categories:

-  Business services
-  Computer and technical services
-  Market research services
-  Banking and finance
-  Hospitality and Accommodation
-  Employment placement services
-  Legal & Insurance services
-  Architectural services
-  Real Estate
-  Office supplies, stationery, and furniture

Our supply chain remains predominantly Australian-based, with suppliers ranging from multinationals to smaller enterprises, individuals and sole practitioners many of whom are engaged on a contractual basis specifically to advise on discrete client projects. The small number of international suppliers predominantly assist us with our international business activities conducted out of our Singapore office. In common with Australia, a significant proportion of the international suppliers are engaged as sub-consultant professionals to advise on discrete client projects.

The table set out in Appendix 2 provides an outline of our international suppliers, including a comparison with the geographical supply chain characteristics and overall supplier numbers described in our last statement.

Further aspects of our international supply chain are described in the following section under the sub-heading, 'International suppliers'.

02 REPORTING REQUIREMENTS #3 & 4:

Identifying, assessing and addressing potential modern slavery risks.

SUPPLY CHAIN RISK ASSESSMENT

Urbis once again subjected our complete annual procurement data to an advanced, proprietary risk assessment process, through our long-term engagement with external anti-slavery consultants. This assessment determined the following industry categories have an elevated potential modern slavery risk exposure, influenced by our higher relative spend amount across these categories:

- **Australian Retail Trade** – including our office goods supplies e.g., such as stationery and other day-to-day office consumables.
- **Australian Business Services** – including a range of professional service providers, such as consulting, legal services, marketing, and accounting.
- **Australian Hotel and Restaurant Services** - including a range of corporate catering, hospitality suppliers, restaurants / cafes, and accommodation providers. We engage these suppliers in connection with our team members undertaking work travel for conferences and other business reasons.
- **Australian Real Estate Services** - including the landlords that we lease our commercial offices from, and other property-related suppliers. This is a high spend category for Urbis, which is a key reason why it has been consistently identified in successive reporting periods. Suppliers in this category can also engage higher-risk (domestic) suppliers such as professional office cleaning and security service providers.

The results remain largely consistent with the findings from the corresponding comprehensive risk assessments undertaken in previous reporting periods. The retail trade category was a new identification, although its inclusion in this assessment is attributable to the proprietary process including a new dataset upgrade (incorporating the latest 2023 Global Slavery Index information), combined with an increase in our expenditure in this category to reflect increased business and operational growth.

(a) International suppliers

Urbis recognise that the comprehensive proprietary risk assessment continues to identify a small number of our suppliers operating out of countries with inherently elevated modern slavery risk. Whilst Urbis does engage with direct (first tier) suppliers in countries that, on a national scale, may be viewed as having significantly elevated modern slavery risks, a more granular picture of our specific supplier engagements indicates that those engagements are primarily in industries that do not align with the overall national trends for elevated modern slavery risk – refer to the further discussions below.

(i) Cistri's Singapore Offices

As described above, the Urbis international operations are mostly conducted through our Singapore-based entity - Cistri, out of our only international office also located in Singapore.

Our Singapore office staff are engaged in technical and professional client advisory roles and are employed on direct contracts. The proprietary risk assessment identified that catering and cleaning services suppliers at the Cistri office fall within a general industry category recognised as a potential source of elevated modern slavery risk. Urbis also recognise the general findings relating to domestic modern slavery risks in Singapore noted in Walk Free's updated 2023 Global Slavery Index.¹ Nevertheless, we do not believe the general assessment and findings in the Walk Free Index translate directly to or impact on the specific operational characteristics of our office in Singapore and our modern slavery risk profile generally.

1. <https://www.walkfree.org/global-slavery-index/findings/global-findings/>

(ii) Engagement of specialist contractors in higher risk countries

Consistent with existing business practices, Urbis continued to engage independent contractors based in countries outside Australia to assist with specific discrete client projects for which we are engaged in those countries. This includes clients based in the United Arab Emirates and other countries in the Middle East who were engaged primarily through the Cistri office in Singapore. Australian team members also undertook some travel to the Middle East. These independent contractors were engaged to perform specific professional advisory work that predominantly required specialist skills and tertiary education, including the provision of economic advisory and feasibility studies.

Some of the contractors were sourced from countries that, on a national scale, are recognised as having elevated modern slavery risk in some industry categories, including Indonesia, UAE, the Philippines, India, and China. Given we contracted directly with these independent contractors, without involving any third-party intermediary (e.g. third party labour hire agencies), and we also ensured, to the fullest extent practicable, our terms of engagement aligned with those that apply in Australia, we consider these engagements did not impact our overall modern slavery risk profile.

ADDRESSING OUR SPECIFIC ASSESSED AND IDENTIFIED RISK AREAS

Urbis did not receive any reports, or otherwise become aware of, any actual or suspected incidents of modern slavery during the reporting period.

Unless otherwise noted, the ongoing due diligence and risk mitigation measures described in our previous modern slavery statements continue to be implemented.

The following is an overview of some of the due diligence and risk mitigation measures we undertook during the reporting period.

(a) Engagement with our Australian providers of office cleaning services

In last year's statement, Urbis described our plan to engage with those cleaning services providers that were not reporting entities under the Act to assess the providers' modern slavery risk profile and key risk mitigation measures.

Two of our office cleaning service providers that met the criteria were subject to due diligence during the reporting period, which revealed important entity-specific information of a kind that is not publicly available, including:

- The service provider's use (or non-use) of subcontracted labour, and/or labour hire providers to source workers.
- The framework and measures the service provider has implemented to assess and address modern slavery, including supply chain risk assessment and relevant procurement screening processes.
- Whether the service provider undertakes a risk assessment prior to engaging a new vendor and whether it sources goods or services from outside Australia.
- The nature and extent of the service provider's governance and policy approach to addressing modern slavery.
- Whether the service provider has an implemented grievance mechanism for modern slavery issues.
- Whether employees are provided with a contract of employment detailing working conditions and key terms of employment are explained prior to signing.
- The nature and extent of the modern slavery-related training and awareness raising that the service provider undertakes internally and amongst its suppliers.
- The nature and extent of any remedial responses that could be deployed in relation to modern-slavery related incidents, concerns or complaints.

Following a review of the entity-specific information and taking account of the service provider's turnover, Urbis was satisfied the two cleaning service providers in question are appropriately mitigating or taking active steps to better mitigate the modern slavery risks that are inherent in the cleaning industry sector. One of the participating cleaning services providers expressed a strong intention to develop and implement its own modern slavery response framework. Urbis intends to continue engaging in a dialogue with this service provider on the progress of such initiatives.

(b) Responsible Procurement Statement

To further reinforce the commitments Urbis require from our suppliers through our Supplier Code of Conduct, Urbis has developed a 'Responsible Procurement Statement'.

The Statement confirms our commitment to the adoption of responsible procurement practices that include a commitment to:

- avoid Urbis causing or otherwise contributing to adverse human rights outcomes, including a commitment to combatting modern slavery risks in our supply chains, and
- Urbis sourcing goods and services and engaging with suppliers who comply with all local and national laws and regulations including those related to the protection of human rights including modern slavery.

A motivation for developing the Statement was to enable Urbis to provide smaller suppliers who are non-reporting entities, including those that had previously expressed a degree of uncertainty about the modern slavery requirements in our Supplier Code of Conduct, with improved guidance about our Supplier Code, its adoption and our expectations of suppliers.

All new suppliers, who are not engaged on our standard terms and conditions (which require compliance with the Supplier Code of Conduct), are now provided with the Statement as part of our onboarding practices. Our operations teams have also provided the Statement to existing suppliers with relatively high procurement spend.

Urbis is continuing in its efforts to provide the Statement to all office building managers, plant hire contractors, air conditioning contractors, including entities beyond our direct (first tier) suppliers.

(c) Master Services Agreement – Information Technology

During the reporting period, Urbis developed and implemented a template Master Services Agreement ('MSA') for the procurement of digital and technology related products and services. In recognition of the potential modern slavery risks in the procurement of digital and technology products and services, the MSA specifically requires that the supplier comply with our Supplier Code of Conduct and with the modern slavery laws.

We now routinely seek to engage all new suppliers of digital and technology related products and services using the MSA. Those suppliers not engaged using the MSA are provided with a copy of the Responsible Procurement Statement, and we seek to ensure the terms and conditions of engagement include a requirement that the supplier comply with our Supplier Code of Conduct and the modern slavery laws.

(d) Foundational screening of professional sub-consultants and office goods suppliers

Urbis has continued to complete foundational screening of its suppliers for modern slavery red flags, including:

- media and public information screening on small office consumables suppliers, catering suppliers, and office maintenance providers (conducted by our office services team); and
- general desktop-based due diligence on new subconsultants engaged during the reporting period for client projects in higher-risk countries (conducted through our legal department and as part of the mandated project risk assessment process for larger client engagements).

(e) Targeted Procurement Team Training

Urbis has continued to implement its targeted training modules to all new staff with a specific involvement in procurement activities. We had a 100% completion rate for this cohort during the reporting period.

(f) Establishment of Procurement Procedure Working Group²

Urbis has established a 'Procurement Procedure Working Group'. The Working Group has responsibility for developing and implementing a more formal framework for improved organisation-wide procurement practices and procedures that will actively incorporate and better address a range of ESG matters.

Membership of the Group is comprised of members from our Office Services, Legal, Executive, Information Technology and Finance teams.

The initial aims for the Group include establishing and assessing the feasibility of various alternatives for implementing more rigorous ESG-related procurement practices, supplier onboarding, compliance and contracting. To improve our procurement procedures, we have identified initial areas of focus centred on avoiding duplication and improved implementation of ESG compliance requirements as part of our 'business-as-usual' practices.

The Working Group plans to develop and implement the more formal framework over the next two reporting periods, including a procurement toolkit, to actively integrate ESG considerations including modern slavery risk-related and carbon emission reduction considerations into supplier screening, selection, engagement and the overall life cycle of our procurement activities.

2. This action occurred after the completion of the subject reporting period, but prior to the lodgement of this Statement.

(g) Continued engagement with the Property Council of Australia and Australian Property Institute's anti-slavery activities

Urbis continued to engage and participate with these external industry groups that focus on a collaborative approach to assisting entities in the ongoing process of developing and improving their individual anti-slavery responses. This included continued participation through the 'Informed 365 Platform' for recording and benchmarking the Urbis response against other industry participant's expectations and participation in industry modern slavery educational events.

03 REPORTING REQUIREMENTS #5:

Measuring effectiveness.

To in part assess the general effectiveness of our modern slavery practices, we once again (as discussed earlier in this Statement) undertook an advanced proprietary modern slavery risk assessment of our annual procurement data. Pleasingly, despite an increase in procurement spend and supplier numbers, the assessment results remain largely consistent with the assessment results in previous reporting periods suggesting ongoing consistency in the general effectiveness of our modern slavery practices.

We conducted a comprehensive modern slavery questionnaire of our two cleaning service providers that are not reporting entities, with both completing the survey and the results indicating they are appropriately mitigating or taking active steps to better mitigate the modern slavery risks inherent in the cleaning industry sector. The training conducted amongst new staff engaged in procurement activities achieved a 100% completion rate.

Urbis considers that, relative to the nature and extent of the overall assessed risk in our core operations and supply chains, our modern slavery response is appropriate and proportionate, with the central features of our modern slavery response framework now in place. However, we also recognise there are further aspects of our overall response that remain a 'work-in-progress' including improvements in assessing the effectiveness of the measures we have undertaken to assess and address modern slavery risk.

Some previously identified planned action areas are now largely superseded or have otherwise significantly evolved from our previously stated position. This includes as a result of our updated internal priority to assess, develop and adopt a more uniform and holistic procurement process (discussed above) that incorporates ESG considerations, including modern slavery, as part of the day-to-day operational procurement practices.

At this early stage in the development of the Procurement Procedure Working Group, we foreshadow that a revised 'Measuring Effectiveness Framework' will be a cascading initiative that will be progressively implemented commensurate with or following the broader update of our procurement processes. We believe a staged approach will ultimately enhance our organisational capacity to practically implement a more effective modern slavery response.

04 REPORTING REQUIREMENTS #6 & 7:

Consultation with owned entities and other information.

As noted above, there are ten additional non-reporting entities that are wholly owned and controlled by Urbis and these are listed in Appendix 1 to this Statement.

We consulted with all of the entities listed as trading in relation to the preparation and contents of this Statement. Unless stated otherwise, the supply chain modern slavery risk assessments and associated due diligence initiatives discussed in this Statement also apply for the operations and supply chains of those of the wholly owned and controlled entities listed as trading.

A1 APPENDIX 1

URBIS' OWNED AND CONTROLLED ENTITIES

As with previous reporting periods, this Statement relates to the reporting entity, Urbis Ltd, and the following wholly owned and controlled entities that do not, individually, meet the annual revenue threshold as separate reporting entities under the Act:

- Urbis Services Pty Ltd
- Urbis Valuations Pty Ltd
- Urbis Investment Management Pty Ltd
- Urbis Property Services Ltd*
- Cistri Pty Ltd*
- Urbis Qld Pty Ltd
- Urbis Policy Pty Ltd
- Cistri (Group) Pte. Limited* and its subsidiaries Cistri Pte Limited and Cistri Limited*

* Not trading.

A2 APPENDIX 2 INTERNATIONAL SUPPLIERS

Country	Trend in supplier numbers	Industry category(ies) in which the supplier(s) operate
Singapore	Increase to 47 suppliers (31 in FY22)	Office suppliers, travel service providers, professional services providers, financial services, corporate memberships and recruitment consultants.
USA	Increase to 11 suppliers (9 in FY22)	Computer and software services, and subconsultants
Indonesia	Increase to 6 suppliers (1 in FY22)	Professional Services Subconsultants
Philippines	Increase to 1 supplier (nil in FY22)	Professional Services Subconsultant
India	Increase to 3 suppliers (2 in FY22)	Computer and software providers and subconsultants
United Arab Emirates	Increase to 3 suppliers (1 in FY22)	Professional Services Subconsultants
China	Decrease to 3 suppliers (5 in FY22)	Professional Services Subconsultants
Malaysia	Decrease to 1 supplier (3 in FY22)	Business services
Hong Kong	Decrease to 1 supplier (2 in FY22)	Business services
Germany	Decrease to 1 supplier (2 in FY22)	IT services
United Kingdom	Decrease to 4 suppliers (6 in FY22)	Education services and business services
Vietnam	Decrease to 1 supplier (2 in FY22)	Business services

