



# MODERN SLAVERY STATEMENT

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# 1.0 ABOUT THIS STATEMENT

Architectus' FY2023 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.

In March 2023, Architectus acquired 100% of Conrad Gargett Holdings Pty Ltd and its subsidiaries, resulting in the group's revenue surpassing \$100 million for the first time in FY2023. 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 2023 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 21 May 2024.

According to 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 21 May 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 Human Rights Institute** defines modern slavery as a range of practices including human trafficking, forced labour, debt bondage, 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 first Modern Slavery Statement, covering the year ending 30 June 2023. As our inaugural effort, the report is, by necessity, focused on the future – laying the groundwork for our reporting and actions in the years ahead.

We are committed to using this statement as a framework for holding ourselves and our supply chains accountable for doing the right thing day-to-day. 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 650 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).

In May 2023, Architectus Australia acquired 50% of Architectus Aotearoa (New Zealand), a strategic investment to secure our position across Australasia and to realise project opportunities in Aotearoa. However, this statement reports solely on Architectus Australia for the FY2023 period.

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

Architectus employs more than 650 designers and specialists providing professional services across a range of industry sectors and geographies.

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.

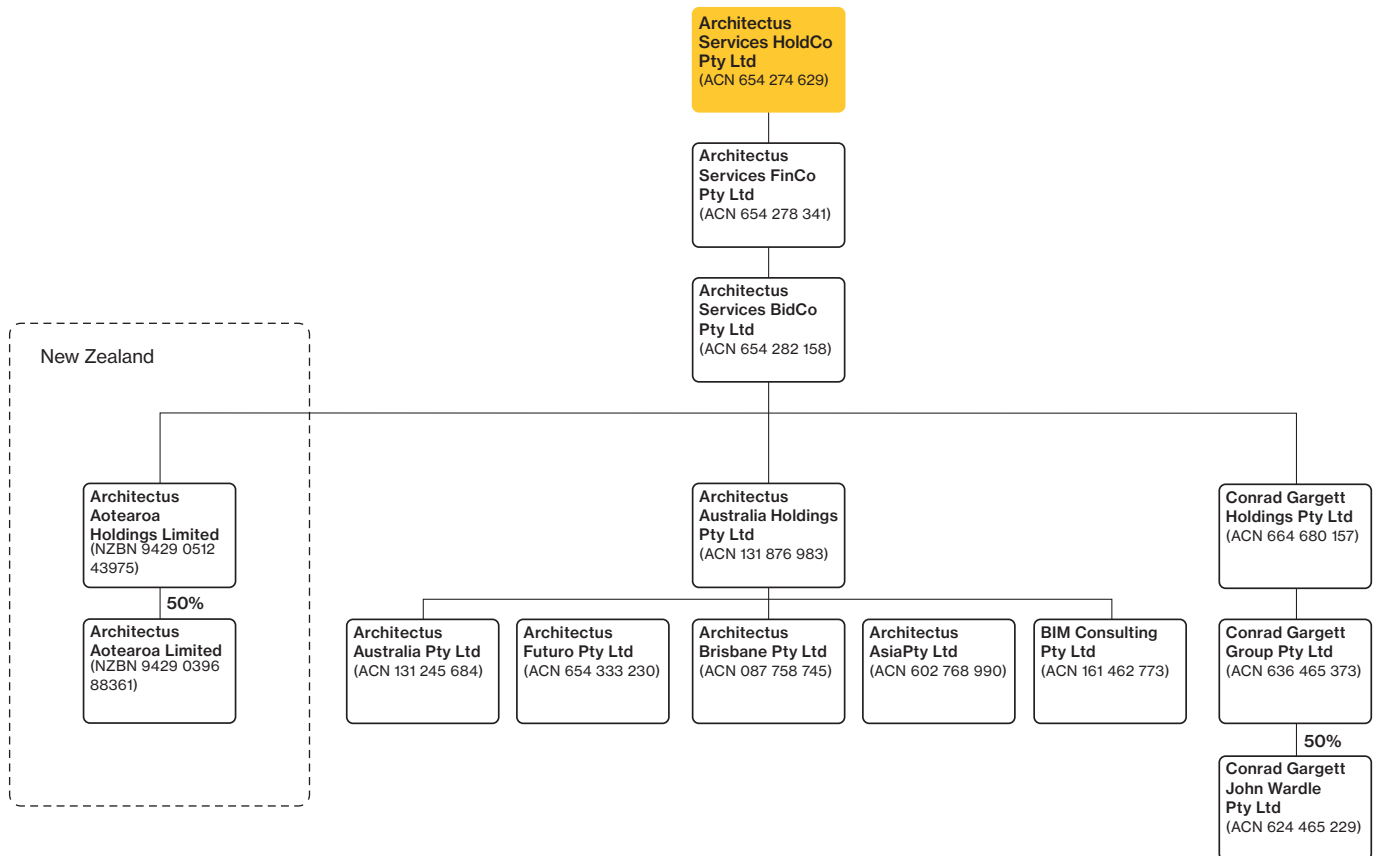


Diagram 1  
Architectus Group Structure







# 4.0 POLICIES + PROCEDURES

## 4.1 Policies and Procedures

Architectus has various policies and procedures in place which 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.

### 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

Architectus maintains contracts with more than 400 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 developing a supply chain consultation process to assess the standards of quality, integrity, and corporate social responsibility in our service delivery and supply chain. The planned supplier assessment will become a mandatory process within our developing Acceptable Consultants Register and will occur before any initial engagement. This assessment will evaluate various aspects, including governance, ethics (with a focus on modern slavery), whistle-blowing policies, anti-bribery and corruption measures, safety protocols, and CSR initiatives. Once implemented, all future supplier assessments will be reviewed and verified before a supplier is added to the Acceptable Consultants Register.

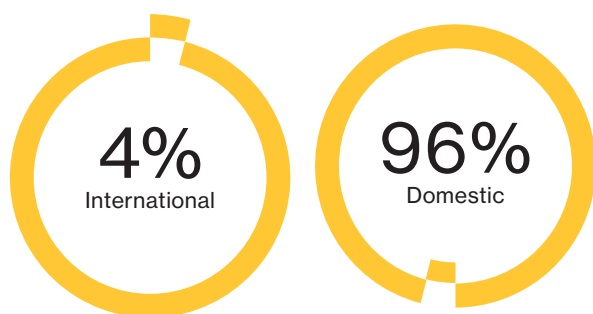


Diagram 2  
FY2023 Supply Chain

Supply Chain Internationally		
Location	Services	Percentage
<b>Abu Dhabi, U.A.E</b>	Professional Services	0.24
<b>France</b>	Property + Operations	0.24
<b>India</b>	Property + Operations	0.24
<b>Netherlands</b>	Property + Operations	0.47
<b>New Zealand</b>	Subcontracted Services IT + Technology	0.47
<b>Singapore</b>	Human Resources	0.24
<b>Spain</b>	Subcontracted Services Property + Operations IT + Technology	0.71
<b>UK</b>	Professional Services	0.24
<b>Ukraine</b>	Subcontracted Services	0.24
<b>USA</b>	Subcontracted Services	0.47
<b>Vietnam</b>	IT + Technology	0.24

# 5.0 Supply Chain

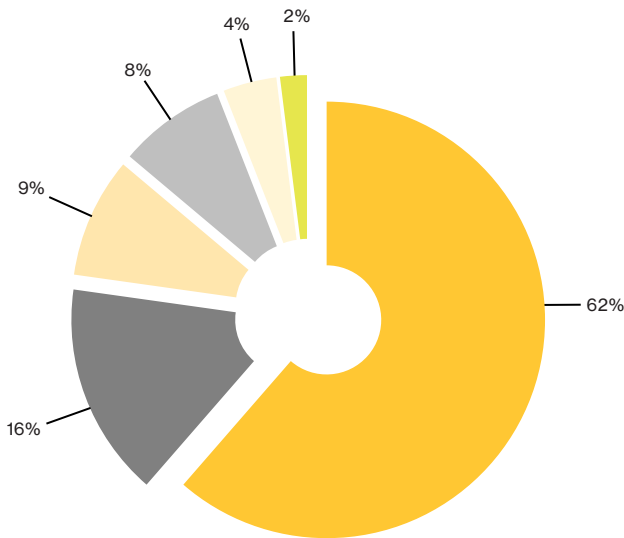


Diagram 3  
Total FY2023 supply chain spend by category

**Legend**

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

**The International Labor Organisation estimates that over 40 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, 1.5% are situated in countries identified as having a high risk of modern slavery, including Ukraine, United Arab Emirates, and India. However, within this subset, 100% of these suppliers offer professional sub-consultancy services, which are classified as low risk.

## 5.1 Risks of Modern Slavery practices

Working together with external subject matter experts, we have conducted a modern slavery risk assessment of our supply chains and operations including an online self-assessment form sent to all suppliers.

For the purposes of this inaugural statement, we have reviewed the responses from suppliers of goods and services during the reporting period. These respondents represent over 45% of the total 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.

**Legend**

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

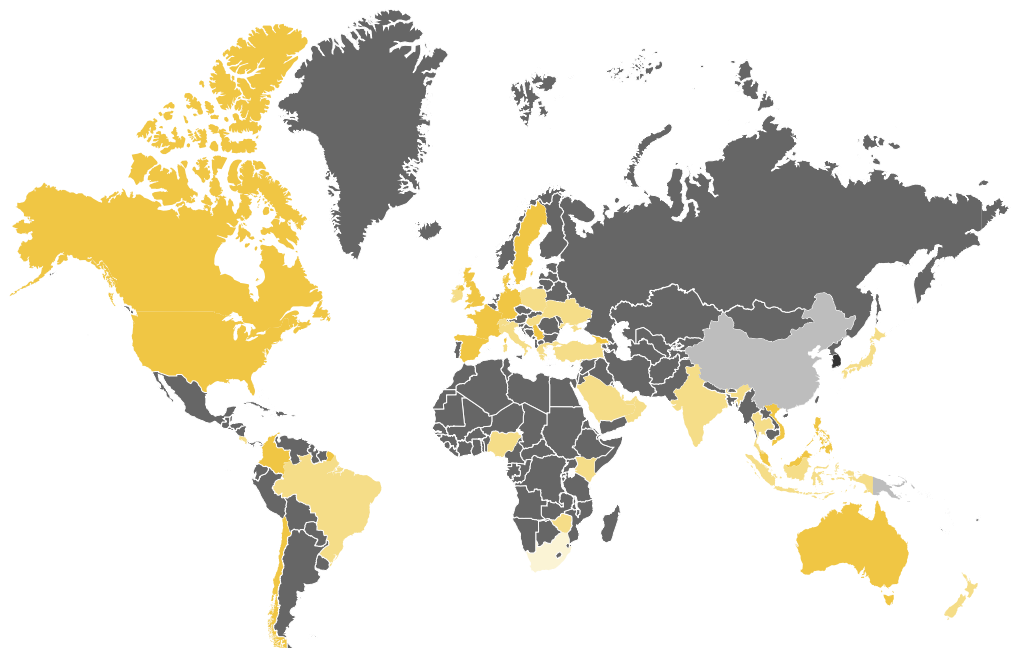


Diagram 4  
Supply Chain – Countries of Operation  
Source: Tier definitions sourced from The Trafficking in Persons Report



# 5.0 Supply Chain

## 5.2 Our commitment to action

We are using the results of the modern slavery risk assessment survey to inform our responses and actions in addressing modern slavery risks beyond the current reporting period.

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<b>Modern slavery risk mitigation training</b>	We will provide appropriate training and educate our people directly responsible for supply chain management and recruitment in how to mitigate slavery, human trafficking, and child labour risk.
<b>Policy and document review</b>	<p>As part of our internal governance due diligence, we will undertake a policy and document review to identify potential areas where we could incorporate specific provisions addressing modern slavery risks. As part of this, we will:</p> <ul style="list-style-type: none"><li>– develop an Anti-Bribery and Corruption Policy and a Human Rights Policy</li><li>– create and issue a Supplier Code of Conduct policy that specifically addresses modern slavery</li><li>– update our standard Subconsultant Engagement agreement to include specific provisions addressing modern slavery risks.</li></ul>
<b>Increase risk assessment respondent rate</b>	We will aim to increase the coverage of suppliers participating in the online self-assessments in future reporting periods.
<b>High risk supply chain respondents review</b>	<p>We will conduct a comprehensive assessment of the 12 suppliers we have identified with the highest elevated relative risk of modern slavery within their own supply chains.</p> <p>The results of this assessment will guide our decisions on further engagement with these suppliers in subsequent reporting years. Depending on the outcomes, it may require collaborating with suppliers to mitigate their risk rating.</p>

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## 5.3 Approach to assessing effectiveness

We understand that our initial assessment of modern slavery risks in our operations and supply chains requires ongoing scrutiny to ensure we continuously improve as a business.

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.

As a result of the commitment to the action list, Architectus will investigate and develop appropriate key performance indicators (KPIs) to measure the effectiveness of these and future 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.

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