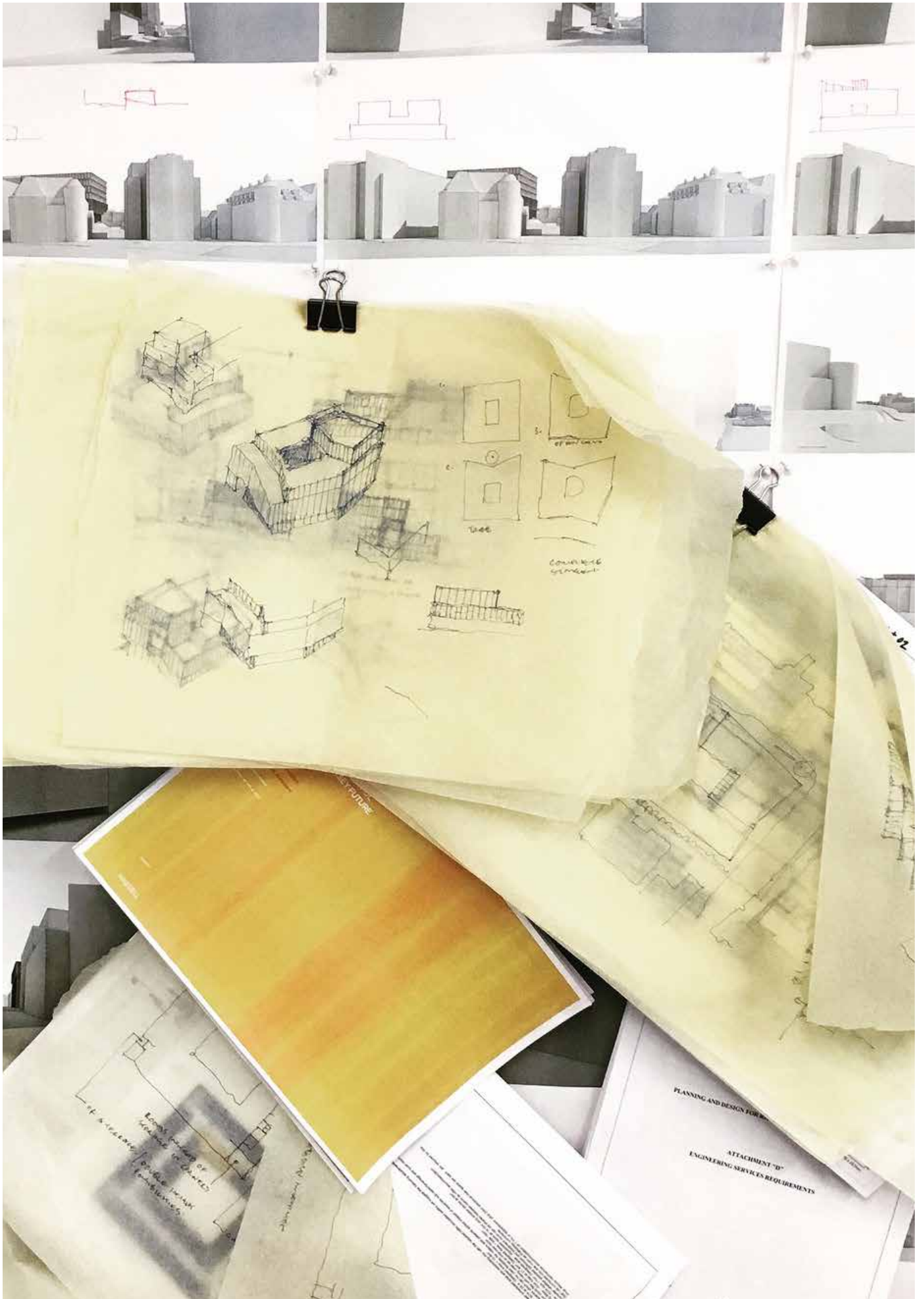


Hassell

MODERN SLAVERY TRANSPARENCY STATEMENT

HA





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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 2020 reporting period, we had 506 employees in Australia and 208 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.

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.

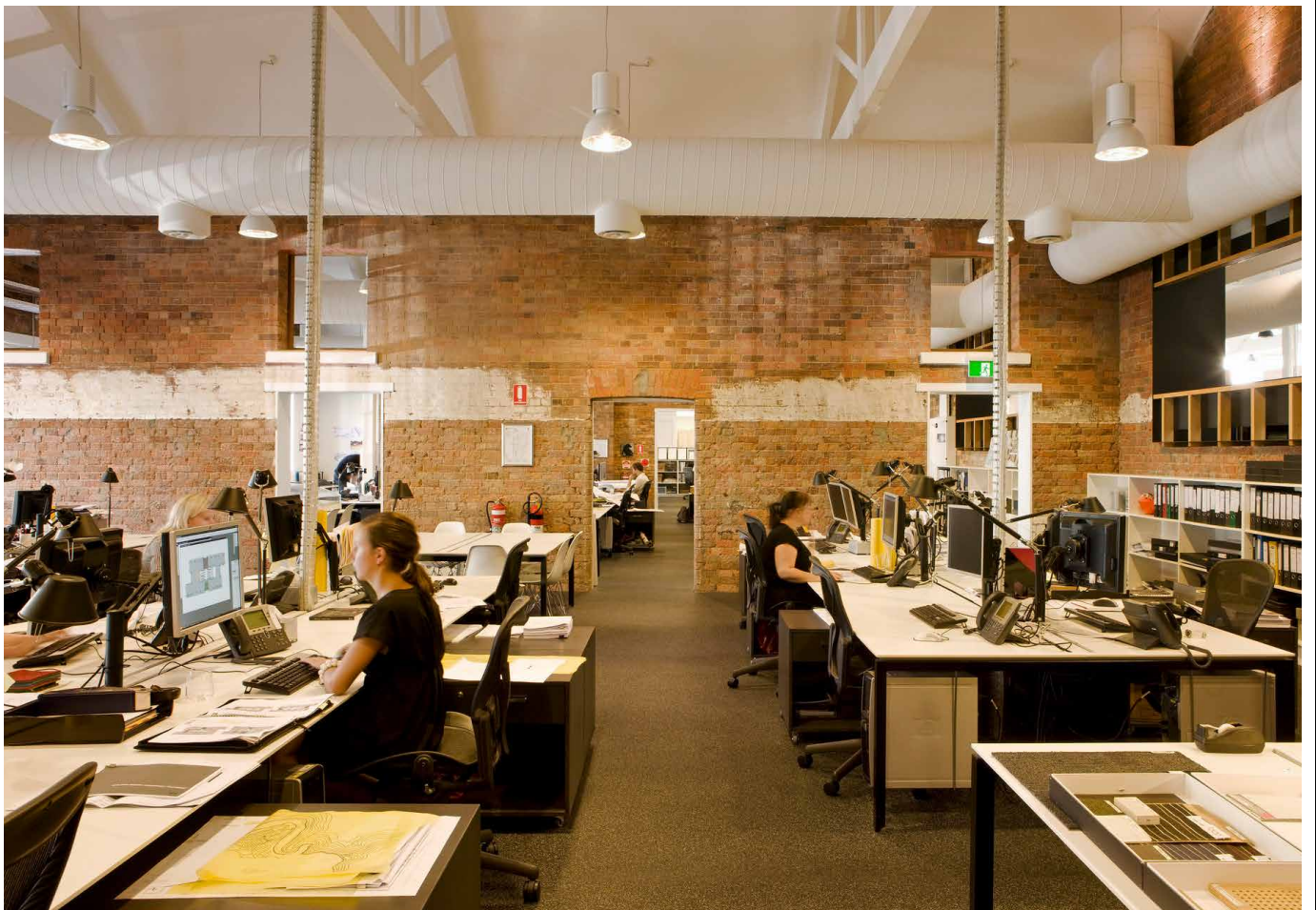
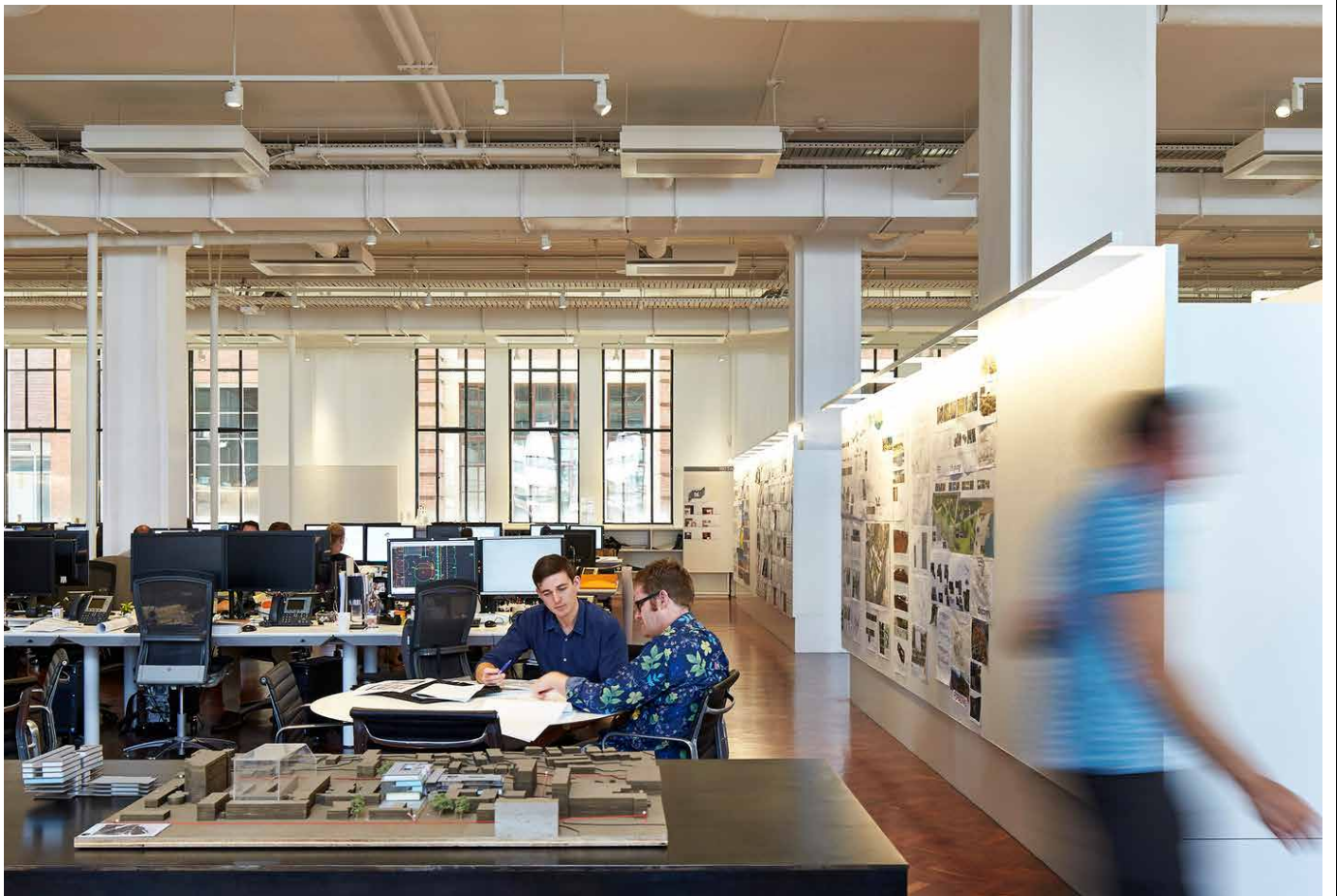
A Board of Management oversees our Operations across the practice and is supported by committees and local leadership in each of the sectors in which we operate. During the last financial year, the Board also established a Risk and Audit

Committee to oversee risk and compliance reporting.

A 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 supplies after excluding staff salaries account for approximately 67% of our total supply chain. The remainder comprises various suppliers required as part of our design process (3%) and normal business operations (30%).



MODERN SLAVERY RISK ASSESSMENT

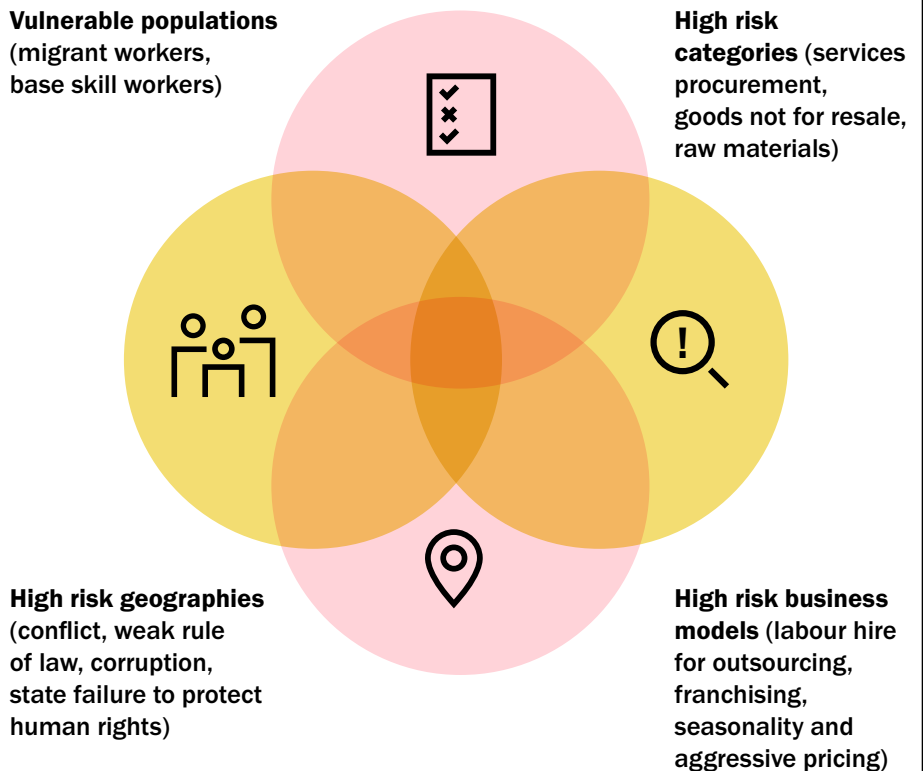
In undertaking our first Modern Slavery Statement in response to the Australian legislation, we have employed the guidance of KPMG and the Australian Human Rights Commission published in their report [“Property, Construction and Modern Slavery. Practical Responses for Managing Risk to People”](#) (2020).

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

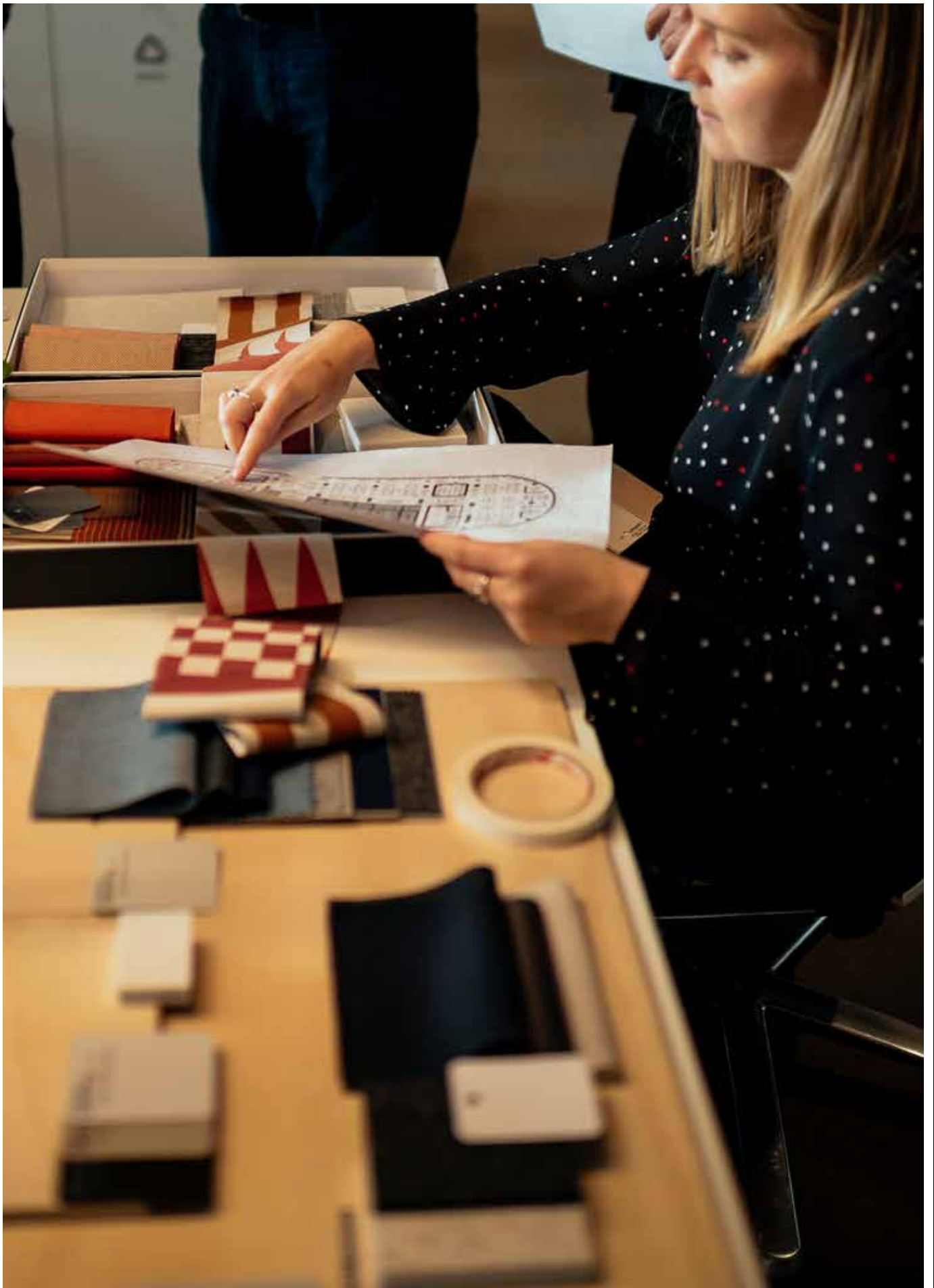
- vulnerable populations (migrant workers, base skill workers)
- high risk categories (services procurement, goods not for resale, raw materials)
- high risk geographies (conflict, weak rule of law, corruption, state failure to protect human rights)
- high risk business models (labour hire for outsourcing, franchising, seasonality and aggressive pricing).

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



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.

There are several suppliers within sectors such as digital and IT services, cleaning agencies and

companies with low-skilled, high turnover staffing from which we are seeking greater transparency to further minimise our risk profile.

On projects and situations where this risk may change, we strive to work with suppliers, and other professionals, who are well known to us or adhere to a similar code of ethics.

Our local studio procurement teams have also begun to assess new suppliers against these criteria prior to engagement, and where necessary seek further clarification from suppliers in relation to their own modern slavery policies and procedures.

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 have 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.

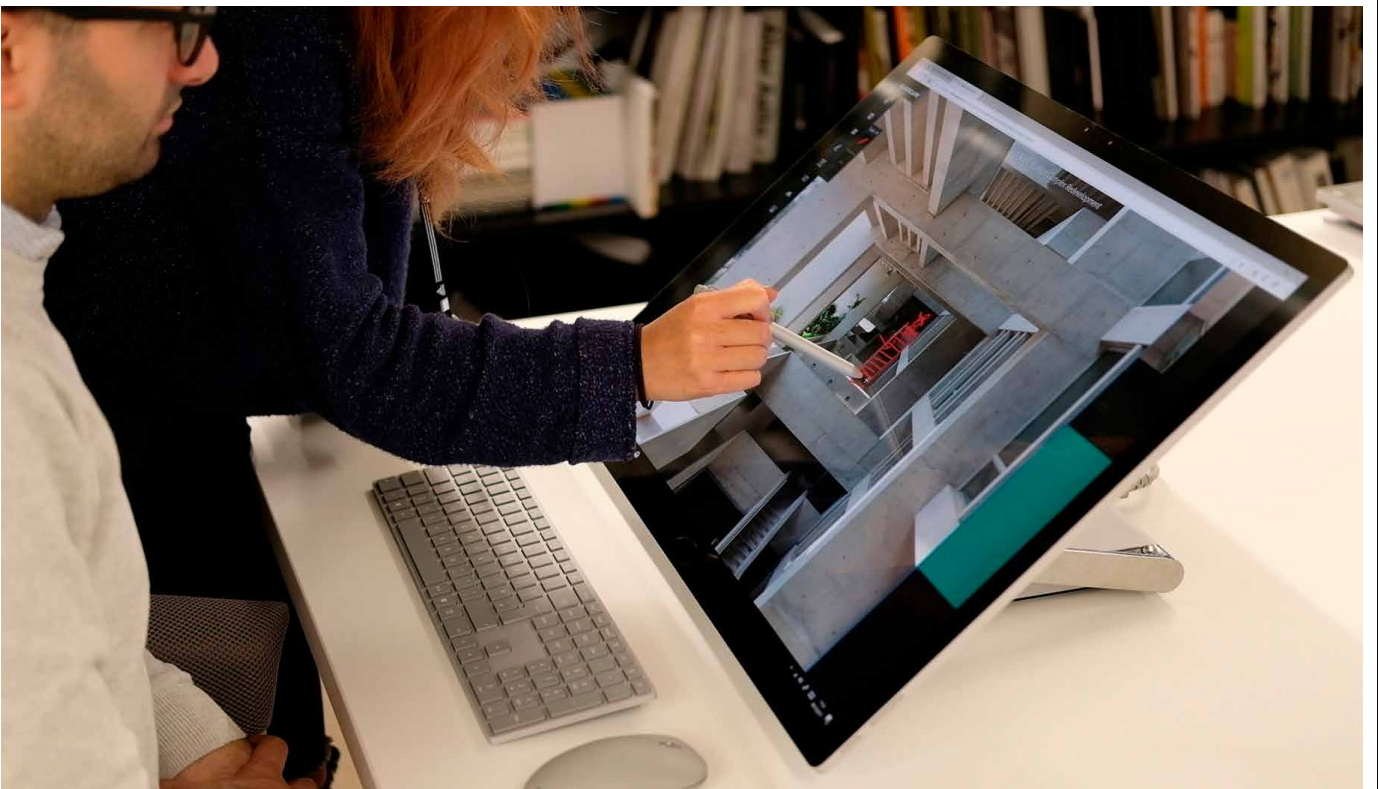
The Working Group has assisted with above due diligence and reviewing how these can be further developed in coming reporting periods.

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 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 will look to improve this training throughout the year by improving the modern slavery risk induction for current and new employees.

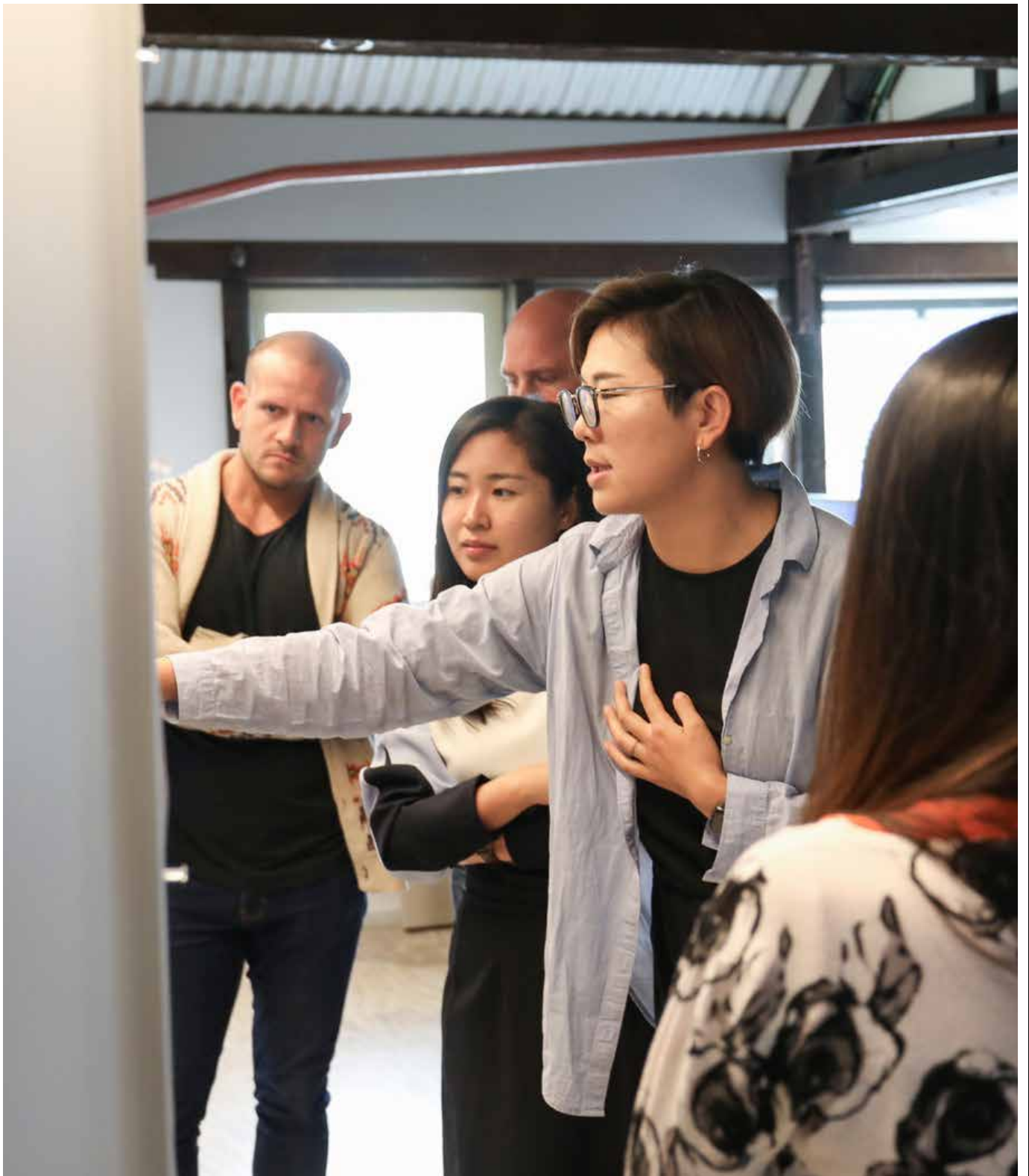


ASSESSING EFFECTIVENESS

As this is our first Statement, the overall effectiveness of our approach is difficult to gauge at present. Our Working Group will look to develop measures of effectiveness to be able to track progress in future reporting periods, including tracking metrics of compliant vs non-compliant suppliers and review of policies and processes to further embed modern slavery risk assessment into our daily practice.

We considered systematic improvement by our industry in minimising risks of modern slavery fundamental to the effectiveness of our own work in this regard. Accordingly, one of the key areas for further development in the short term is a policy on how to address suppliers that cannot (or will not) provide their own Modern Slavery Transparency Statement or assurance that they can minimise

risks in their own supply chain. For example, consideration is being given to how we might work with suppliers to highlight modern slavery risks (for those not currently subject to reporting requirements themselves) and at what point punitive measures should be employed against recalcitrant suppliers. We intend to report more on these measures in the next reporting period.



CONSULTATION

As noted, our Working Group has included 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.

As noted below we will look to see how this may be expanded in future to others that we collaborate with.





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

Like many businesses, the Covid-19 pandemic necessitated a transition from our studios to remote and home-based working at various times during the year, and in some instances, this has continued into 2021. Whilst some projects went on hold, overall, the impact on our project work was not material and we are able to continue to service our projects under such circumstances. However, the business's necessary focus on continuity and change management did impact our ability to address other priorities, including the preparation of this statement; hence some aspects of our response have been carried over into future periods.

Priorities for the 2021 reporting period

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

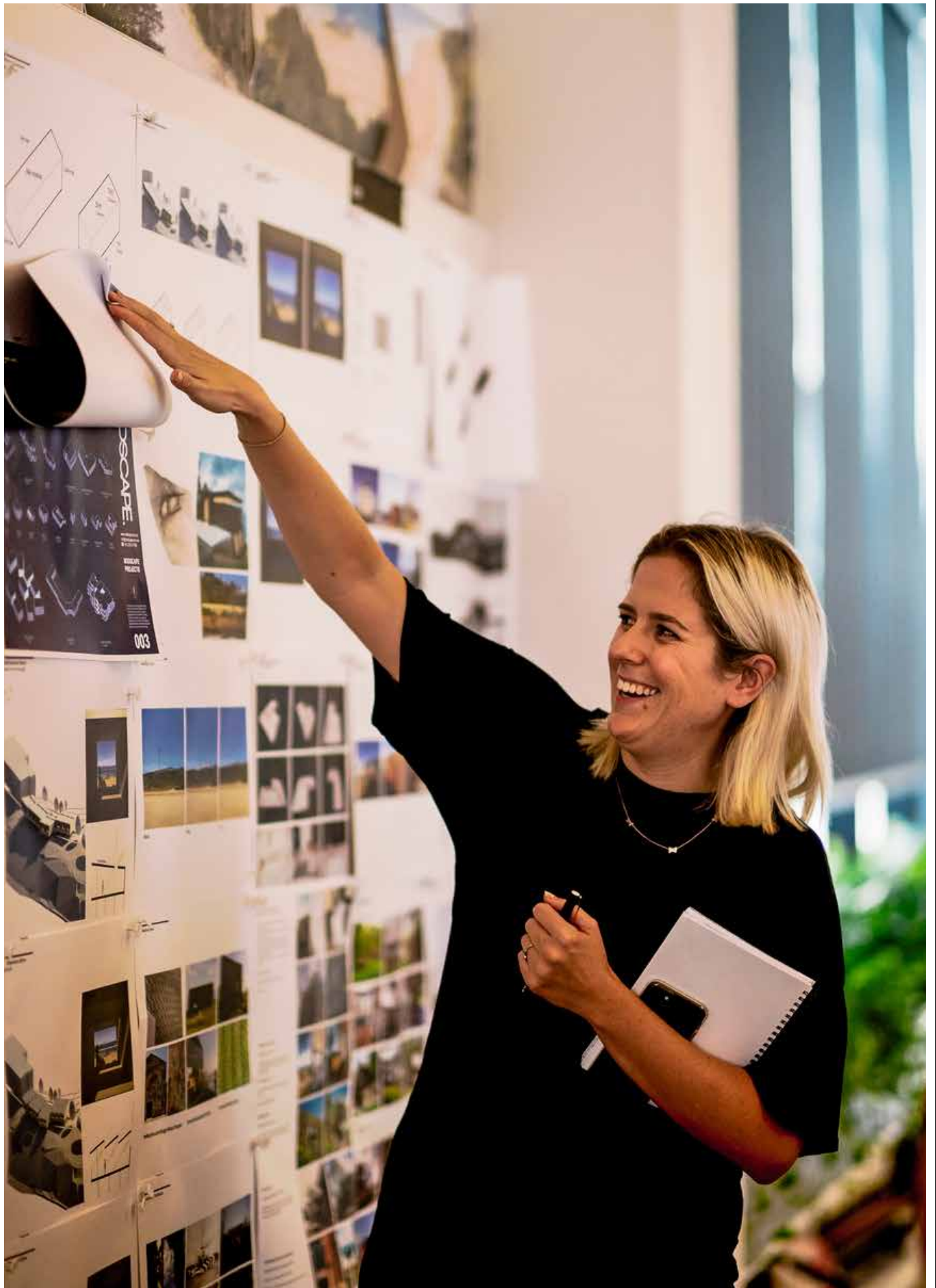
- Risk assessment refinement - We will refine our methodology for risk assessment to target high-risk and high-effectiveness aspects of our supply chain
- Effectiveness - As discussed under Criteria 5, we will develop measures of effectiveness to be able to track progress in future reporting periods
- Consultation - We will explore opportunities for industry-wide consultation and action on modern slavery risks and we will implement in-house training on modern slavery risk assessment, including within our new employee induction processes.

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 2020.

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.



Steve Coster
Managing Director



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