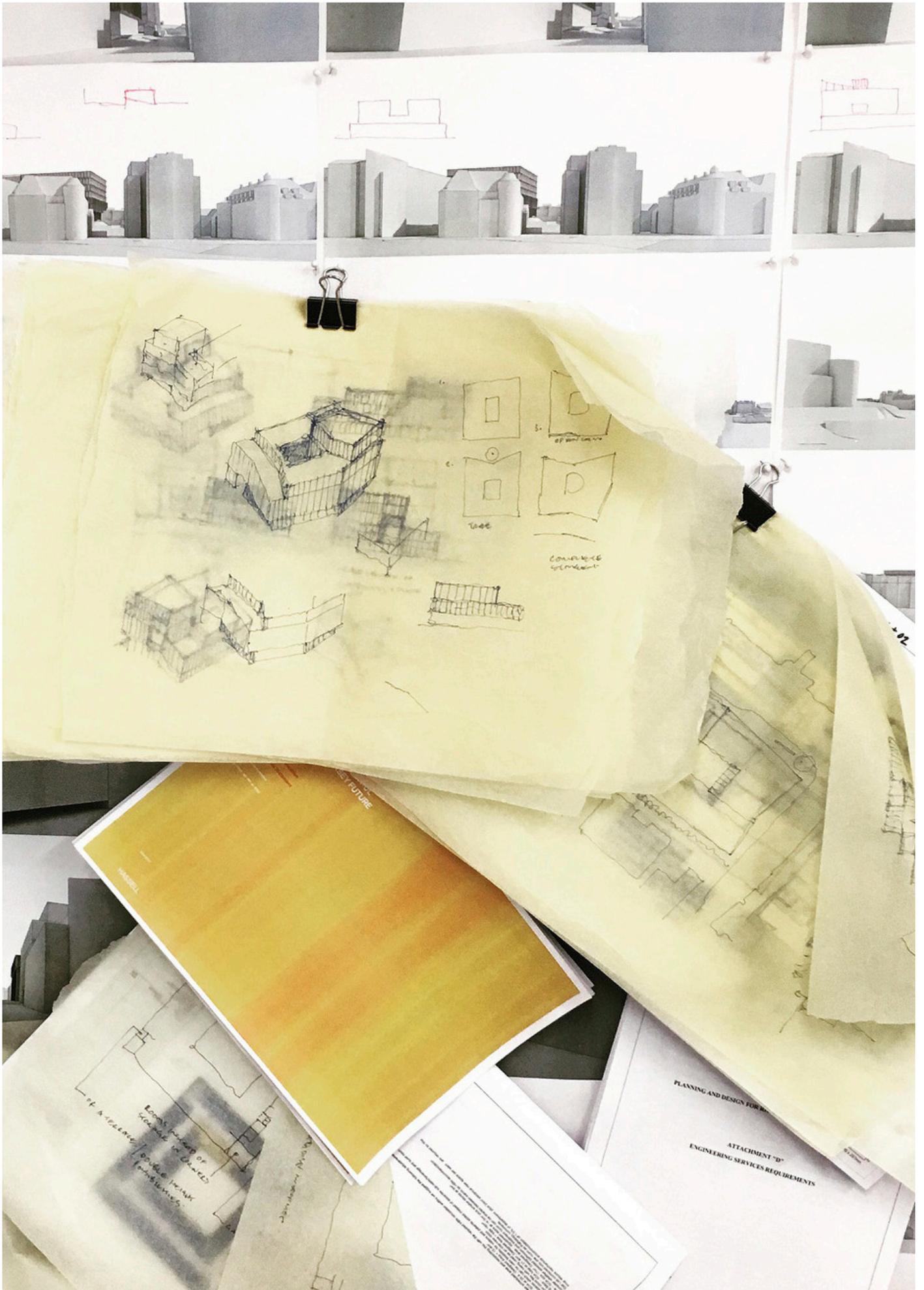


Hassell

**MODERN SLAVERY
TRANSPARENCY
STATEMENT**

H





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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 2021 reporting period we had 495 employees in Australia and 197 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. Recently the Board 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

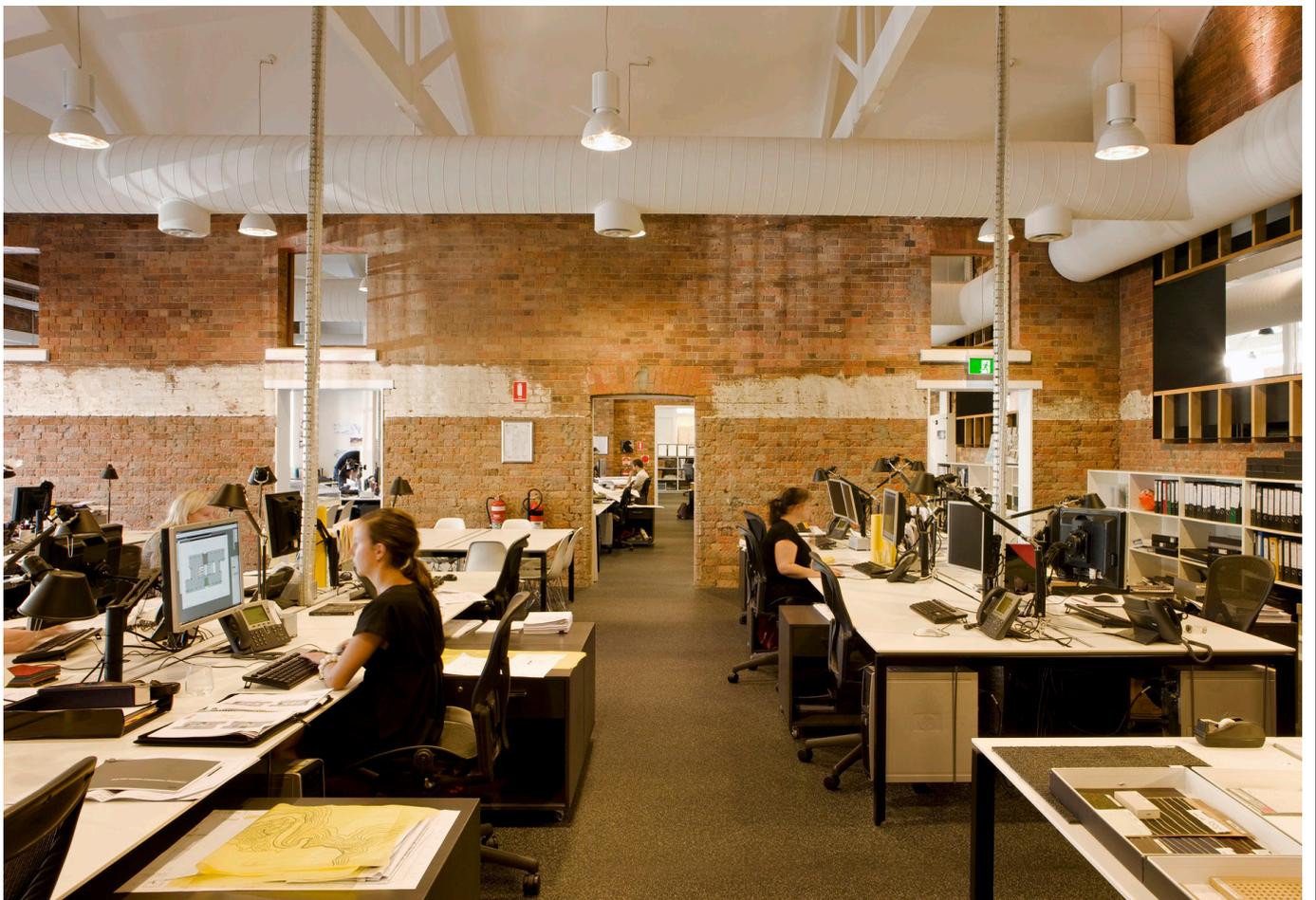
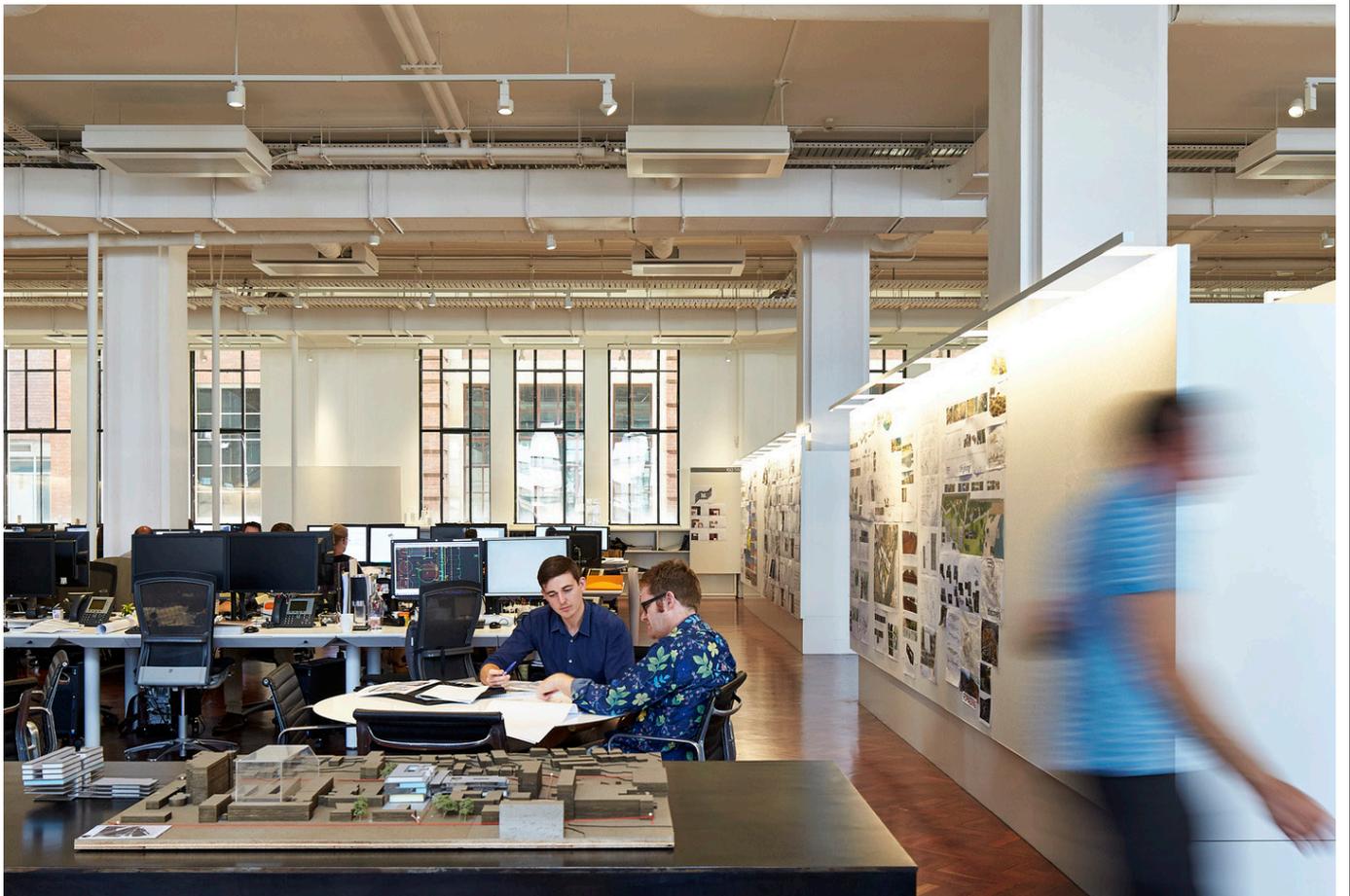
consider risks associated with any new projects being considered in countries outside our immediate countries of operation. This would include assessing projects that may be in countries identified in the Global Slavery Index and therefore may present higher risks in the local supply chain.

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 suppliers after excluding staff salaries in 2021 accounted for approximately 64% of our total supply chain. The remainder comprises various suppliers required as part of our design process (3%) and normal business operations (33%).

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 undertaking our first Modern Slavery Statement in response to the Australian legislation earlier this year, 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.

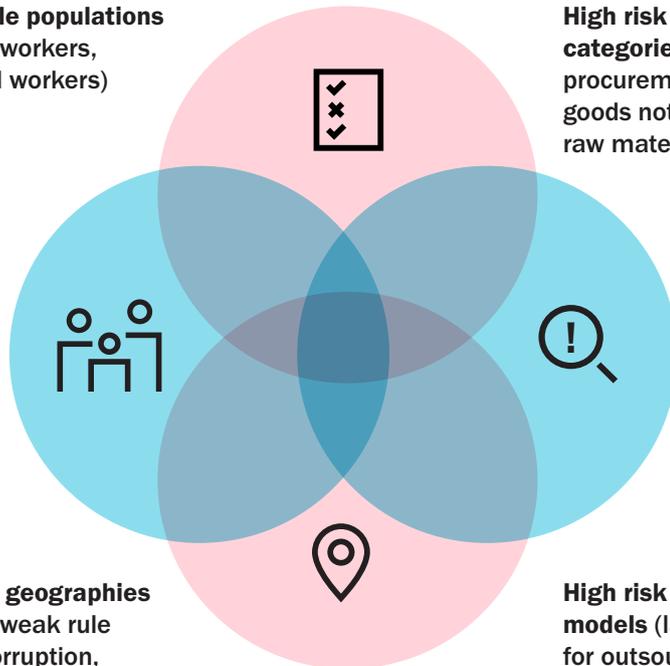
Diagram – KPMG / AHRC Key Risk Factors in Property & Construction

- 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.

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 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.

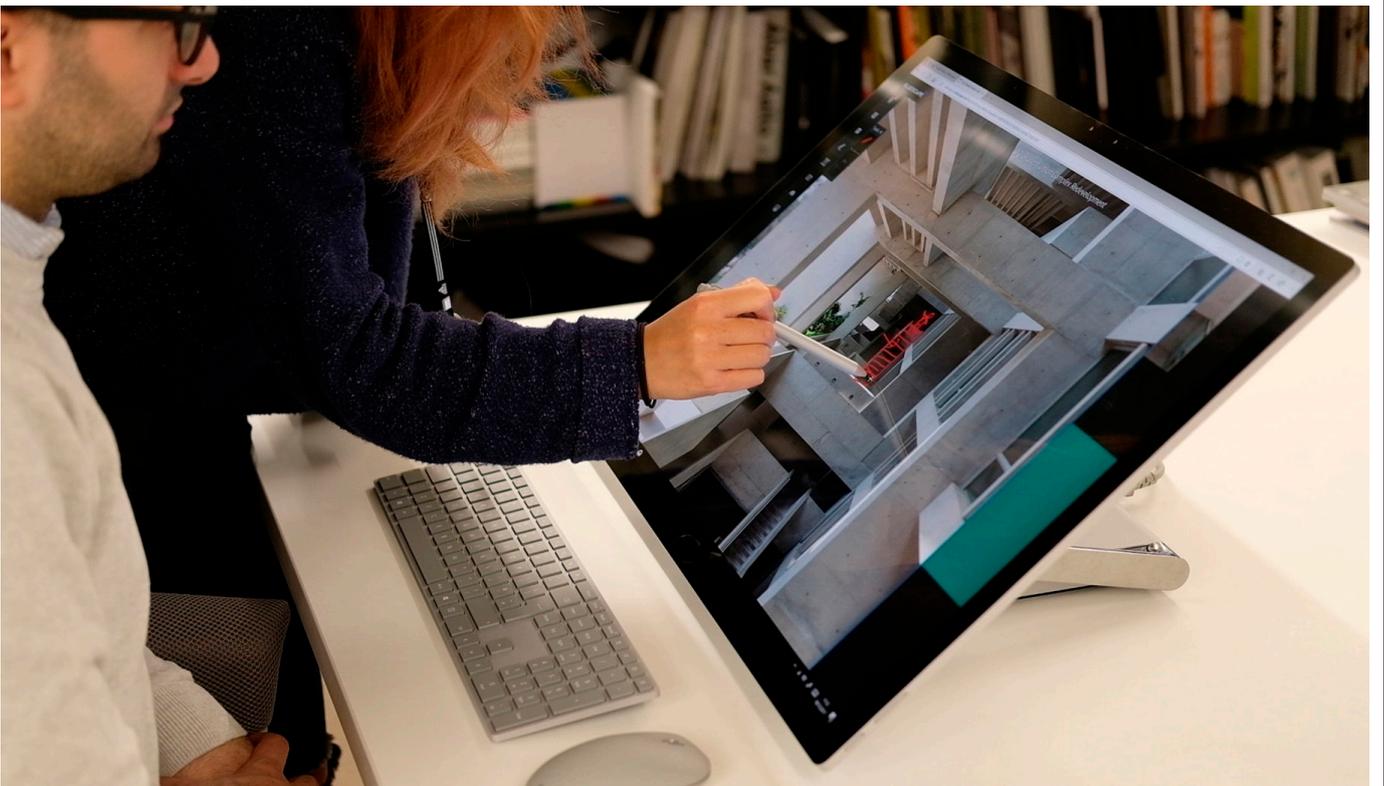
Sub-consultancy partners

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 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.



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 also found that an increasing number of our suppliers are issuing their own statements, either on their website or via the Modern Slavery Register.

However, the impacts and disruption caused by Covid-19 have hampered us again this year by diverting resources and attention away from these actions.





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 have also seen this year industry groups like the Australian Institute of Architects introduce measures such as a Products and Materials Library to enable designers to search for materials that meet certain compliance standards including for a Modern Slavery Statement.





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 continued into 2021. Whilst some projects went on hold, overall, the impact on our project work was not material and we were 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 2022 reporting period

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

Consultation – We will follow with interest the work that the Australian Institute of Architects are doing on their Products and Material Library, as noted above, and how we can use this in our projects

Procurement – Reviewing our procurement processes to see how a more standard procedure can be implemented for onboarding new suppliers to obtain details of their response to Modern Slavery

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 2021.

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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