

Unispace Australia Modern Slavery Statement 2023	Document VNO: 01.1
	Amendment No: 01
	Approved By: Steven Quick, Global CEO
	Approved Date: 03/03/23

Unispace Australia Modern Slavery Statement 2023

About this statement

This statement is made pursuant to Section 16 of the Australian Modern Slavery Act 2018 (Cth) and sets out Unispace Global Pty Ltd’s (“Unispace”) actions to understand, mitigate, and prevent all potential modern slavery risks and impacts related to its business across its operations and supply chain for the financial year ending in December 2022.

Modern Slavery is a grave human rights violation that occurs in almost every country in the world. According to the International Labour Organization (ILO), Walk Free, and the International Organization for Migration (IOM), there are approximately 50 million people living in forms of modern slavery around the world, including forced labour and human trafficking.¹ Most cases of forced labour are found in the private sector, hence the critical role of businesses in tackling modern slavery across their operations and supply chains.

At Unispace, we are committed to conducting business in an ethical manner everywhere we operate, which means implementing policies, procedures and processes that meet our moral and ethical obligations to contribute to tackling modern slavery.

As a global strategy, design, and construction firm creating people-centric spaces that spark brilliance, we believe it is our responsibility to ensure the dignity and rights of our employees and the people working in our supply chain. We are committed to equal and absolute rights to freedom, justice, and decent working conditions. Unispace does not tolerate any form of modern slavery, including but not limited to forced labour, human trafficking, child labour, and debt bondage, in any part of our business operations or supply chain. We expect our business partners, contractors, suppliers, and other stakeholders to fully adhere to this stance and actively work to assess, mitigate and prevent all forms of modern slavery linked to their services or products in a transparent and proactive manner.

Modern Slavery Act Criteria

This Modern Slavery Statement was prepared to meet the mandatory reporting criteria set out under the Modern Slavery Act. The table below identifies where each criterion is disclosed within this statement.

Modern Slavery Act Criteria	Statement Location
Identifying the reporting entity	Page 2
Describe the reporting entity’s structure, operations and supply chains	Pages 2-3
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Page 4
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Pages 3-6
Describe how the reporting entity assesses the effectiveness of these actions	Page 6

¹ International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM) (2022). Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, Geneva. Available at https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---ipec/documents/publication/wcms_854733.pdf.

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Describe the process of consultation with any entities that the reporting entity owns or controls	Page 6
Other relevant information about this statement	Page 6-7

Our structure, operations and supply chain

Our structure and operations

Unispace is a global workplace strategy, design, and construction leader creating experiential spaces for a rapidly changing world, driven by data and real-world insights. We believe our spaces should spark brilliance in people who use them. We share a global vision to promote and craft local experiences, while honouring local culture everywhere we work. As one unified team, we create environments that deepen connections, foster a sense of belonging and propel success. Understanding the importance of the environments and conditions in which people and communities thrive, we are committed to creating a lasting, positive impact in the communities in which we live, work, and affect through our business.

Unispace’s parent company is PAGAC Urban (UK) Ltd, and has subsidiaries in New Zealand and India. As part of a group of companies with a global presence, we have operations across Europe, Asia, Oceania, North America, and South America. In 2022, we employed over 600 permanent staff, most of which are located in Australia, New Zealand, Europe, and the United States.

Our Supply teams across the business manage and coordinate procurement activity across the end-to-end procurement lifecycle, ensuring sourcing of goods and services is undertaken in accordance with the Company’s policies and procedures.

Our supply chain

Unispace aims to promote sustainable and ethical behaviours and practices across our operations and supply chain, and work with suppliers that share our values. We expect our suppliers to comply with all applicable legislation and the principles set out in our Supplier Code of Conduct.

Unispace recognises the opportunity to create a positive impact on people and communities by making considered choices about how we source the goods and services necessary to operate the business. We are committed to supporting local and diverse suppliers that have businesses in the regions in which we operate where possible. Therefore, many of our tier 1 suppliers are located in the countries where we operate. While these countries, such as Australia and the United Kingdom, are generally considered to be low risk for modern slavery, we understand the importance of taking risk-based approaches and conducting effective due diligence to mitigate and prevent modern slavery risks and impacts.

Our policies

Unispace is committed to internationally recognised human rights standards and frameworks, including the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights (UNGPs), the UN Global Compact Principles, the International Labour Organization (ILO) declaration on Fundamental Rights and Principles at Work and other ILO Conventions, and the Ethical Trade Initiative (ETI) Base Code.

We commit to the highest standards of social, environmental, and ethical conduct in our business operations and supply chain. This includes providing safe working conditions, respectful and fair treatment of workers, and acting fairly and ethically. We are committed to ensuring respect for the human rights of all stakeholders impacted by our operations – employees, business partners, suppliers, local communities, and customers. We do not tolerate violations of human rights committed by Unispace’s employees, affiliates, or any third parties acting on our behalf or related to any aspect of a Unispace operation. We do not tolerate the use of child labour, prison labour, forcibly indentured labour, bonded labour, slavery, or servitude.

Unispace has established several effective policies to ensure we are conducting business in an ethical and transparent manner. A summary of our policies includes:

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- **Code of Conduct:** practical set of guiding ethics principles to enable employees uphold ethical behaviour at all times. It informs our employees of our expectations and standards in the way they act as individuals at work.
- **Supplier Code of Conduct:** we require our suppliers to comply with Unispace’s Global Supplier Code of Conduct. Based on international frameworks and standards, this document establishes expectations on supplier business conduct relating to how goods and services are provided to us and our clients, with clear expectations on modern slavery including prohibition of forced labour and child labour. Suppliers receive this document during our onboarding process for an acknowledgment before any work is undertaken.
- **Anti-bribery Policy:** prohibits any employees from offering, giving, soliciting or accepting any form of bribe or engaging in other forms of unethical behaviour. We aim to roll-out a more comprehensive Anti-bribery, Fraud, and Corruption Policy to all our offices in 2023.
- **Global Whistleblowing Policy:** describes the grievance procedures for Unispace’s employees including temporary workers and contractors, allowing all employees to raise concerns about how colleagues are being treated or practices within our business or suppliers without fear of reprisal and with protection from retaliation and harassment.

We are developing a recruitment policy to be implemented across multiple regions of operation, which will detail our principles for ethical and responsible recruitment across our operations and supply chain. Further, Unispace currently checks for employees’ identification documents and references, conducting background checks where appropriate, to ensure potential employees’ right to work.

Our due diligence approach

Risk assessment and management

Unispace is committed to ensuring that its suppliers adhere to the highest standards of ethics and respect for human rights. Suppliers are required to commit to providing safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour, in order to prevent modern slavery across their own operations and supply chain. Unispace works with suppliers to ensure that they meet the standards requested and improve their worker’s working conditions.

As part of our risk assessment process, we assess our suppliers prior to the start of a business relationship by asking suppliers to complete our Trade Contractor Appraisal Form. Unispace reserves the right to only work with vendors that can fulfil the requirements and standards that we expect from business partners in terms of legal compliance, health & safety, and labour standards. With regard to working conditions, our vendor screening form assesses if suppliers have policies and processes in place to monitor and mitigate any issues affecting working conditions and health & safety, including modern slavery policies and what steps companies have taken to address any modern slavery risks in their business. We are planning to roll out a new portal for screening suppliers aligned with ethical and Environment, Social and Governance (ESG) expectations and requirements in 2023. We also plan to enable suppliers to upload their own modern slavery statements to the portal in the future.

As a global workplace strategy, design, and construction firm, where our supplier spend is mostly on interior fit-out materials like furniture, carpeting, tiling and paint, our business can be exposed to modern slavery risks, especially in lower tiers of our supply chain. We endeavour to continue mapping our supply chain in order to effectively monitor and address modern slavery risk in our business.

We encourage suppliers to have ethical audits and ensure that any issues flagged are addressed and proportionally remediated. We are working to ensure ethical audits are part of our future supplier due diligence process. If modern slavery suspicions were found in our supply chain, Unispace would investigate the incident and escalate it to the appropriate channels. Our remediation procedure can be found in our Global Whistleblowing Policy.

Grievance mechanism

Unispace understands the importance of having formal grievance mechanisms in place to provide channels for reporting human rights abuses and providing remedy to victims. We have a grievance mechanism available

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to anyone who wishes to report any problems or issues, including employees, business partners, supply chain workers, and customers, which can be accessed from our [website](#).

Our Global Whistleblowing Policy describes the procedure for raising ethical violations and modern slavery concerns within the business, without fear of reprisal and with protection from victimisation, harassment, or retaliation. Under our policy, employees can report any alleged unethical behaviour and concerns to Unispace’s Whistle-blower Protection Officers or anonymously via our grievance mechanism. All concerns raised will be investigated in a fair and objective manner, including the involvement of external parties where appropriate. The investigation will be completed in a timely manner.

This policy is open to all Unispace employees, including, but not limited to permanent, casual, fixed term employees and temporary workers, and is communicated to all employees initially via email and further placed on the Company’s internal site and form part of the annual Compliance Training programme. Additionally, a copy of the policy is made available on all project sites which Unispace controls for all contractors and suppliers.

Training

We understand the importance of training on modern slavery as a first line of defence against modern slavery, in order for our employees to gain awareness, recognise and report modern slavery both in and around the workplace.

We plan to provide a modern slavery training programme to our employees in 2023, particularly for people working in key roles that may encounter modern slavery risks, such as those working in our procurement and sales teams.

Collaboration

Unispace understands the importance of engaging with our peers and cross-industry organisations in order to share learnings, good practices, and support continuous improvement in tackling modern slavery, as a company and collectively in our industry.

As part of this, we have engaged with the following organisations during the relevant reporting period, particularly in topics related to supplier diversity in order to build more equitable and fair supply chains across our business operations:

- WEConnect International - global network that connects women-owned businesses to qualified buyers around the world, in order to build to a world where women have equality of opportunities to contribute to the sustainable prosperity of their communities.
- Disability:IN – organisations whose aim is to empower businesses to achieve disability inclusion and equality.
- National Minority Supplier Development Council (NMSDC) – supports minority business enterprises, such as black farmers, and enable them to advance economic equity in order to drive socioeconomic equity and generational wealth in communities of colour. One of NMSDC’s programmes is the Black Farmers Equity Initiative which helps Black farmers access agricultural supply chains in a more equitable and fair manner.
- Amotai – organisation that creates opportunities for indigenous owned businesses in New Zealand, namely Māori and Pasifika, linking them with buyers wanting to purchase goods, services and works while supporting underrepresented businesses.
- NGLCC (US National LGBT Chamber of Commerce) – largest US advocacy organisation dedicated to expanding economic opportunities and advancements for LGBTQ people, and the exclusive certifying body for LGBTQ-owned businesses.
- Supply Nation – Unispace is a proud member of Supply Nation, a global movement to support traditionally underrepresented businesses to create greater social good and provide companies the opportunities to work with registered Indigenous business owners.
- MSDUK – UK leading supplier diversity advocacy organisation working for inclusion of ethnic minority businesses in corporate supply chains.

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- Women’s Business Enterprise National Council (WBENC) – leading non-profit organisation dedicated to helping women-owned businesses thrive.

Monitoring our progress

At Unispace, we understand that it is only possible to manage what is effectively measured. Therefore, we aim to measure our progress against modern slavery through the following indicators:

- Percentage of suppliers that sign the enhanced Supplier Code of Conduct
- Number of employees annually undertaking modern slavery training
- Percentage of suppliers screened using our vendor screening form
- Number of reports submitted through our grievance mechanism
- Number of audits undertaken to confirm decent working conditions in our operations and supply chain

Unispace will review our progress at set intervals to determine the effectiveness of our actions, and make changes where needed.

We will use audit findings to identify priority issue areas across our operations and supply chain and inform our future activities and efforts.

We will continue to engage with our partners, contractors, suppliers and other stakeholders to bring any necessary changes into effect. We will review their effectiveness and consider any changes or additional measures that a review brings to light.

Consultation with our Entities

The identification and implementation of actions to assess and manage our modern slavery risks continues to involve consultation and engagement across Unispace’s operations and with key stakeholders. Examples of our consultation included engaging with:

- Supply Chain team
- Legal team
- Operations team regarding local suppliers and modern slavery risks
- Customer conversations
- Independent third parties and experts
- Supply chain through our dedicated supplier portal

Unispace Leadership Team and the Board are briefed on modern slavery regulatory requirements, our risks and responses including this Modern Slavery Statement.

Our future commitments

In order to work towards addressing modern slavery in our business, particularly in our supply chain, Unispace makes the following commitment, progress on which is to be communicated in the next reporting period:

- Roll-out an enhanced Supplier Code of Conduct, with more comprehensive detail on modern slavery expectations for all our suppliers.
- Roll-out a more comprehensive Anti-bribery, Fraud, and Corruption Policy to all our offices.
- Develop a recruitment policy to be implemented across multiple regions of operation.
- Strengthening our internal processes for monitoring modern slavery risk and impacts.
- Improve supplier due diligence on modern slavery by increasing visibility and mapping our supply chain beyond tier 1, understanding of risk by engaging with suppliers, and conducting audits in supplier sites.
- Roll out a new portal for screening and managing suppliers aligned with ethical and human rights expectations and requirements.
- Provide modern slavery training to employees in key job roles.
- Encourage key stakeholders to report potential concerns through our grievance mechanism.
- Work with and educate our suppliers to ensure they comply with any applicable laws and meet our expectations and requirements with regard to modern slavery.

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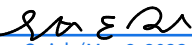
- Encourage our customers and suppliers to have their own suitable anti-slavery and trafficking policies and processes.
- Engage business partners and subsidiaries in responsible sourcing activities and efforts to tackle and prevent modern slavery.

We remain wholly committed as a business to proactively prevent and tackle modern slavery, and have a zero-tolerance approach in dealing with, any business or individuals involved in modern slavery.

Governance

Compliance with the Australian Modern Slavery Act 2018 (Cth) is overseen by Unispace’s Global CEO. This statement is reviewed and updated on annual basis. Further detail related to Unispace’s activity relevant to this statement, or the Australian Modern Slavery Act 2018 (Cth), is available upon request. Please contact disclosures@unispace.com for further information.

Unispace’s FY2022 modern slavery statement has been approved by its Board and signed by its CEO.


 Steven Quick (Mar 6, 2023 15:24 CST)

Steven Quick

Unispace Global CEO

POLICY SIGN-OFF AND OWNERSHIP DETAILS	
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Final Audit Report

2023-03-06

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