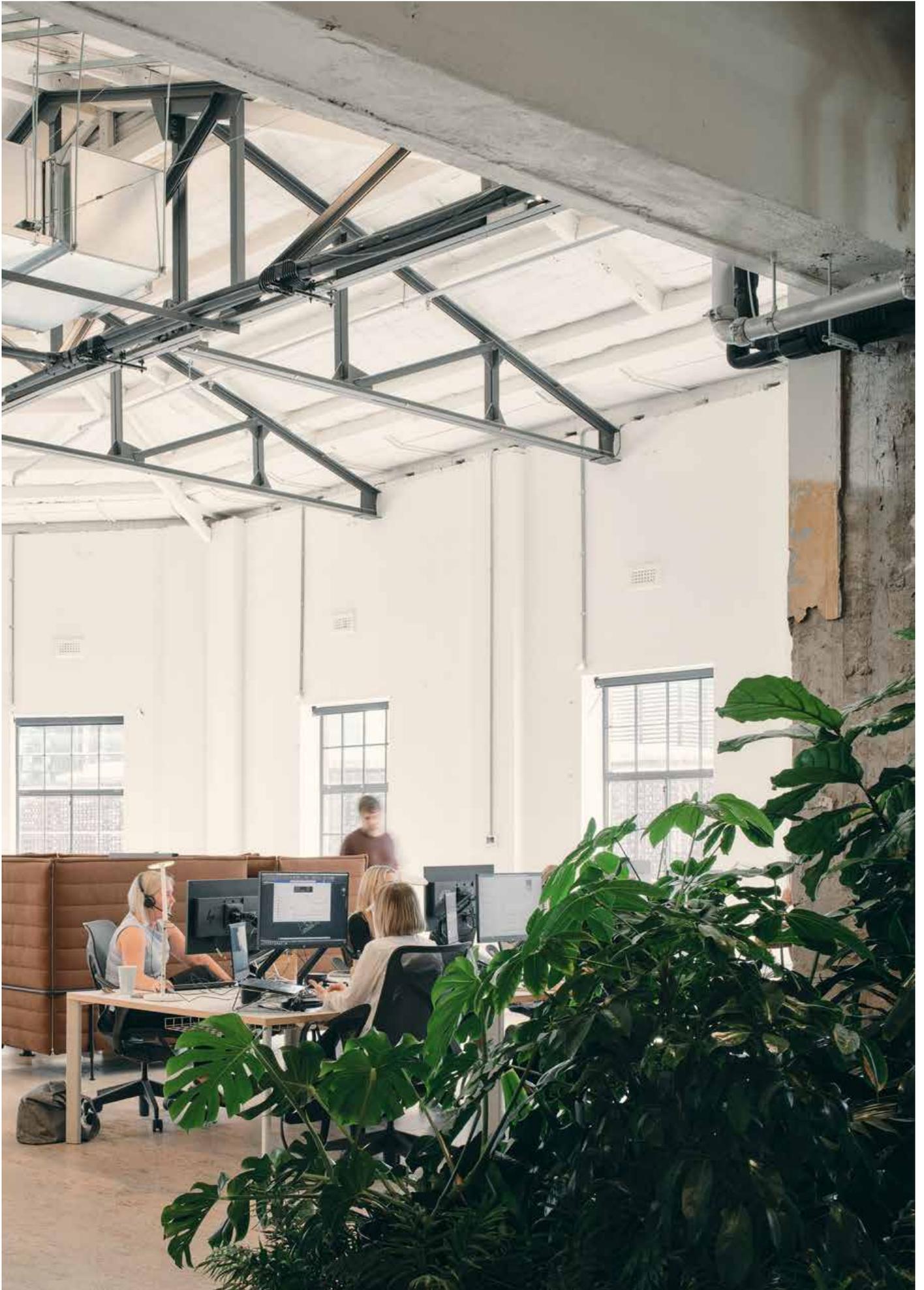

**MODERN SLAVERY
AND HUMAN
TRAFFICKING
STATEMENT**





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About this statement

Hassell's FY2025 Modern Slavery and Human Trafficking Statement has been prepared in accordance with the reporting requirements of Australia's Modern Slavery Act 2018 (Cth), the United Kingdom's Modern Slavery Act 2015 (UK), and associated guidelines, namely Australia's Guidance for Reporting Entities and the UK's Transparency in Supply Chains etc. A practical guide.

Accordingly, this Statement describes:

- Hassell's company structure, operations, and supply chains
- Our policies in relation to slavery and human trafficking
- Potential risks of modern slavery across our operations and supply chains
- Actions taken to assess and address risks of modern slavery across our operations and supply chains, including due diligence
- Training and awareness activities
- How we assess the effectiveness of our actions
- Our consultation processes with the controlled entities

This Statement is submitted as a Joint Statement pursuant to section 14 of the Modern Slavery Act 2018 (Cth), for our two reporting entities Hassell Australia Limited (ABN 34 128 785 080) and Hassell Ltd (ABN 24 007 711 435).

This statement also applies to all other entities within the Hassell group of companies, within Australia and overseas, trading as Hassell. This is appropriate as all Hassell entities have adopted the policies, procedures, and processes pertaining to modern slavery as outlined in this statement, including all subsidiary entities. References to 'Hassell', 'we', 'us' and 'our' refer to Hassell and its owned and controlled entities as a whole. Further information on our company structure is provided on page 3 of this statement.

Information contained in this statement is correct as at 30 June 2025 unless otherwise noted.

Compliant with the requirements as set out in section 54 of the Modern Slavery Act 2015 (UK) and section 14 of the Modern Slavery Act 2018 (Cth), the Hassell Modern Slavery and Human Trafficking Statement for the year ended 30 June 2025 has been considered and approved by the Board of Management of the Hassell group and signed by its Managing Director.

A MESSAGE FROM OUR MANAGING DIRECTOR



The 2025 financial year was a critical period for Hassell as we continued to embed our purpose in everything we do — creating a better future by designing the world’s best places — places people love. One of our proudest achievements was becoming a Certified B Corp, joining a community of like-minded organisations driven by a clear vision and undergoing independent validation of our impact.

We remain steadfast in embedding sustainable and regenerative practices in all our work, mindful of our responsibility to act in an industry that accounts for a large portion of global resource extraction and greenhouse gas emissions.

The buildings and construction sector also accounts for 18 per cent of the 28 million people living in forced labour conditions today. We recognise our role in the eradication of modern slavery and are committed to ensuring such practices have no place within our organisation or our supply chains. This requires ongoing industry-wide advocacy and action.

In Australia, the past year saw several milestones, including the appointment of the inaugural Australian Anti-Slavery Commissioner, Mr Chris Evans. We continue to closely monitor the programs and initiatives led by the Commissioner and welcomed the opportunity to provide input into the development of their Strategic Plan 2025-2028.

Beyond Australia, we recognised the continuing emergence of human rights due diligence regulations in several countries. We also followed the ongoing turbulence in the European Union concerning the adoption of the Corporate Sustainability Due Diligence Directive. While robust discussion is needed on such legislative and regulatory change, we look forward to greater certainty.

This is our sixth Modern Slavery and Human Trafficking Statement, detailing our progress in FY2025. This year, we launched new Sustainable Procurement and Go/No-Go Values and Purpose Alignment policies. We also updated our understanding of modern slavery risks based on recent research and guidance, and rolled out a new online learning module.

We have extended access to our Speak Up Anonymous Whistleblower Platform to our supply chain, updated contractual provisions in our sub-consultancy agreements, and set out our approach for a digital materials framework.

Looking ahead to FY2026, we will continue to engage with our leaders, designers, and business functions to support the uptake of our new policies. We will also develop a practical learning module for designers on how they can act on modern slavery risk when specifying materials and products.

We will operationalise our digital materials library, giving us the ability to assess, record, and compare the modern slavery risk of our materials. We are also updating our finance system to record supplier risk levels, which will streamline our data collection, analysis, and reporting.

As in previous years, we will continue to actively engage with industry bodies and experts on modern slavery and human rights to raise awareness and encourage action within the design and architecture professions.

Liz Westgarth
Managing Director

ABOUT HASSELL, OUR STRUCTURE, OPERATIONS & SUPPLY CHAINS

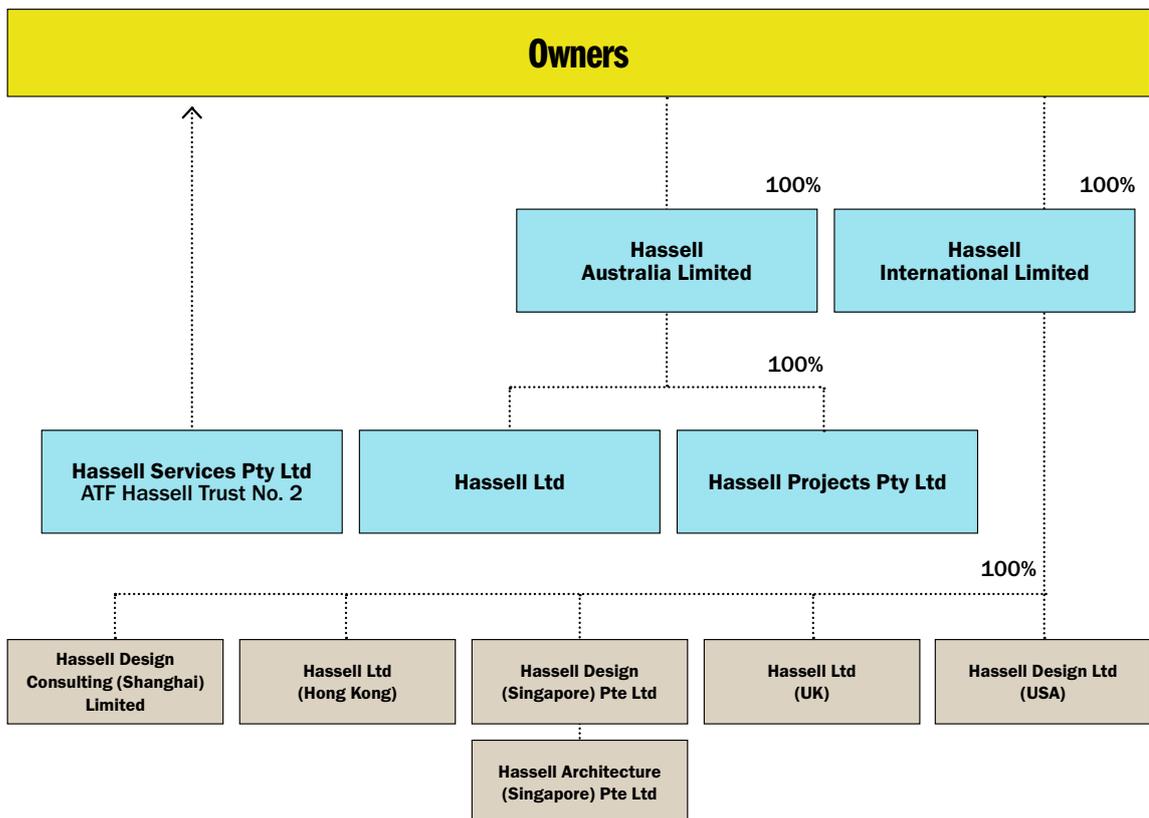
Overview

Hassell is a leading international design practice operating in Australia, China, South East Asia, the United Kingdom, and the United States of America.

At Hassell, we believe design has the power to create a better future. Globalisation, climate change, urbanisation, and digitisation present new opportunities and challenges for how we live.

In this fast-changing context, we bring together the best designers and thinkers in a unique collaborative process that results in both beautiful design and measurable value.

Diagram 1 – Hassell Group Corporate Structure



Structure

In Australia we primarily operate through Hassell Ltd (ABN 24 007 711 435), a wholly owned subsidiary of Hassell Australia Ltd (ABN 34 128 785 080); both entities are reporting entities for the purposes of the Modern Slavery Act 2018 (Cth). In other jurisdictions we operate through local subsidiary companies of Hassell International Limited (ABN 24 128 785 099). In the United Kingdom this is Hassell Ltd (UK) (Company No: 07545819); other entities within the Hassell group are shown in Diagram 1 on the previous page.

Operations

We work across architecture, landscape architecture, interior design, and urban design – a rich inter-disciplinary mix of skills and perspectives that unlocks the economic, social and cultural value of projects.

Our design services are organised by sector, to bring together our expertise to the clients we serve – Commercial & Workplace, Education & Science, Health, Culture & The Arts, Transport, Environment & Communities, Public Spaces, Residential and Mixed use including Hospitality and Retail. To deliver our services, we employ a total of 565 staff across our various studios, including architects, designers, and business function personnel. As at the end of June 2025 we had 428 employees in Australia and 137 located outside Australia.

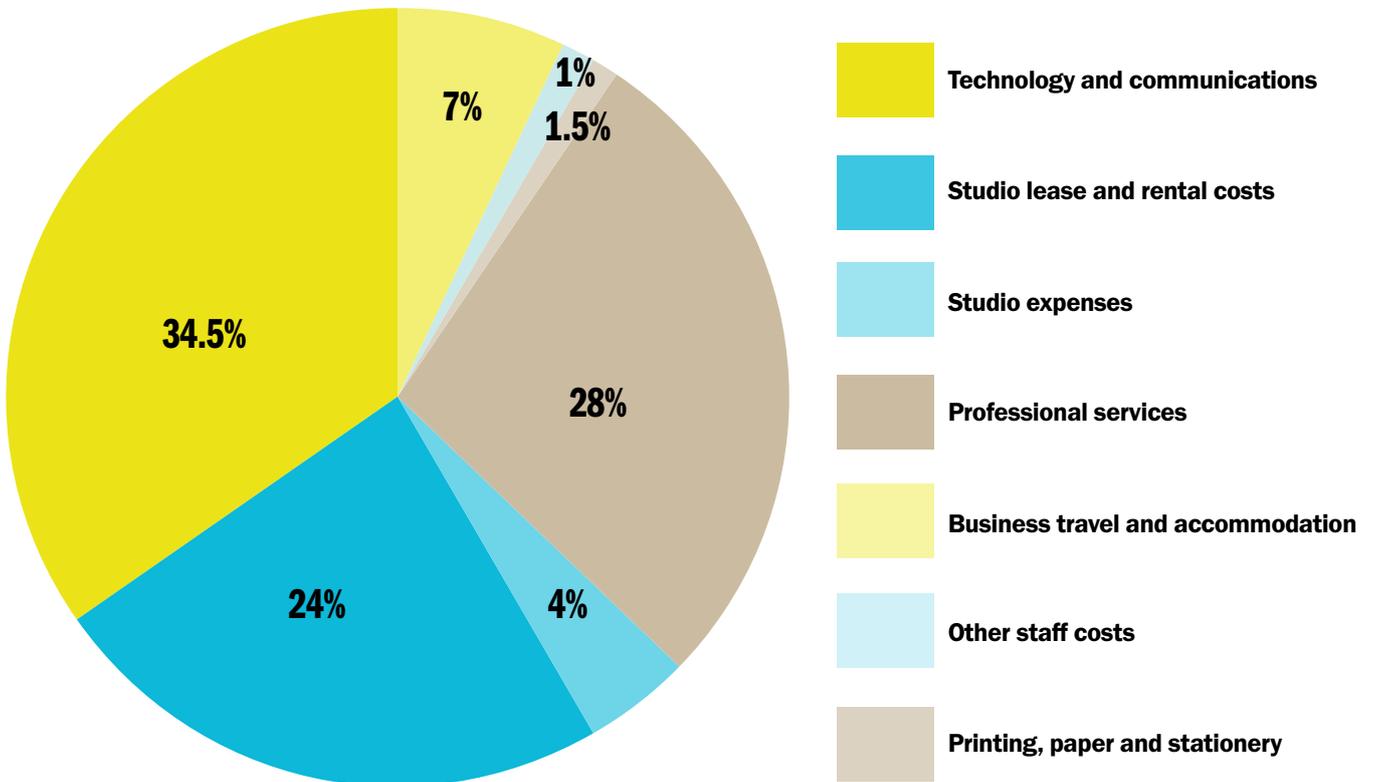
Supply chains

Our supply chains within Australia and internationally are comprised predominantly of various suppliers required as part of our normal business operations. These suppliers accounted for approximately 70% of our total supply chain in FY2025. The remainder comprises other professional design firms who may be engaged as sub-consultants on our project work (30%).

For the purposes of this Statement, we have focused on suppliers of goods and services that support the operation of our studios, as this where we have identified indicators of higher modern slavery risk.

In FY2025 our supply chain comprised 654 suppliers with whom we contract and purchase from directly. The diagram below provides a breakdown of our corporate supply chain spend by sector, excluding project consultants and sub-consultants.

Diagram 2 – Hassell Supply Chain - Breakdown of FY2025 spend



GOVERNANCE & POLICIES

Our governance

A Board of Management oversees our strategy and operations and retains overall responsibility for risk management across and within our organisation. Our Board regularly identifies, evaluates, and responds to key strategic, operational and other risks and provides oversight of our modern slavery risk and reporting program.

Our Risk and Audit Committee (RAC) supports the Board to fulfil its responsibilities in relation to our risk management system, compliance and quality management systems, and external and internal audit activities. The RAC monitors adherence with all applicable laws and regulations, including our modern slavery reporting, and maintains responsibilities for oversight of both practice and project level risks. For example, the RAC 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 includes assessing project opportunities in countries that pose a higher inherent risk of modern slavery, as identified in the 2023 Global Slavery Index, and which therefore may present higher risks in the local supply chain.

Our Board and RAC are supported by committees and local leadership in each of the regions and sectors in which we operate. Our Modern Slavery Advisory Group operated throughout the reporting period to provide focussed input and guidance on the continuous improvement of our modern slavery risk and reporting program. The Advisory Group comprises representatives from each of our regions and operating entities in these regions, including from our finance, legal, business support, and professional disciplines.

Our policies and procedures

Hassell has various policies and procedures in place which respond to modern slavery risks that may arise in our operations or value chain. These policies and procedures apply to all Hassell operations globally and were in place throughout the reporting period. Policies applying to our value chain were introduced during the reporting period. Relevant policies and procedures consist of our:

- Code of Ethics, which enshrines our commitment to human rights, to respect the rights of those who work for and with us.
- Discrimination, Bullying and Harassment Policy, which sets out our responsibilities and obligations for providing an inclusive and

equitable workplace that is free from all forms of discrimination and harassment. The policy also defines our standards of appropriate workplace behaviour and information on how to access our Speak Up Platform to anonymously report any incidents of unsafe or inappropriate behaviour within or outside the workplace.

- Work Health and Safety (WH&S) Policy, which seeks to ensure we maintain a safe and healthy workplace for the prevention of work-related injuries and ill health for all employees and individuals visiting our premises or affected by our activities. Our WH&S policy forms part of our WH&S management system, which is certified to international standard ISO 45001.
- Whistleblower Protection Policy, which outlines our obligations to protect those reporting suspected or perceived illegal or undesirable conduct, including current and former employees, contractors, suppliers, and relatives.
- Anti-Bribery Policy, which defines our position on preventing and prohibiting bribery, and establishes our high standards of ethical conduct and integrity in how we do business globally.

- Go/No-Go Values and Purpose Alignment Policy, which outlines how we assess the potential contribution to adverse human rights impacts through our work. Our process does not define explicit rules of the type of client work we engage in but rather sets out how we go about making clear, evidence-based decisions based on research-informed due diligence.
- Sustainable Procurement Policy, which sets out our commitment to make meaningful and informed procurement decisions using a variety of factors, including social and environmental performance. The recently introduced policy features supplier selection criteria on programs to identify and alleviate modern slavery and human trafficking.

All employees are required to read these policies, and associated procedures and guidelines during their new starter onboarding. These policies are also available to all staff on our intranet.

We continue to demonstrate our commitment to ensuring we protect human rights through our Gender Equity Framework, regular training and development on related topics for our employees, and access to Employee Assistance Program support services.

Our Risk Management Policy and accompanying Protocols document complement our governance structure, and the above policies and procedures. Together, these documents provide a logical and systematic process for the identification, assessment, management, and monitoring of material risks associated with our business operations.

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Our approach is based on AS/NZS ISO 31000:2018 Risk Management and is designed to integrate with our Professional Practice System. While the implementation of the Risk Management Policy is the responsibility of the Board of Management, all Principals and employees have a role to play in the ongoing management of the threats and opportunities that we encounter on a day-to-day basis. This includes the identification and assessment of modern slavery risks that may arise in our operations and supply chain.

Sustainability Framework

Our Sustainability Framework continued to be implemented in our practice and our projects throughout the reporting period, solidifying our increased focus and attention on contributing to a more regenerative, resilient and inclusive society.

The 'social' area of the Framework captures and reflects our commitment to minimising harm while fostering positive impacts on both local and global communities.

We aim to enhance health and wellbeing, improve quality of life, and promote diversity, inclusion and resilience through all our efforts.

To embed the components of our Framework across our studios and into our supply chain, our Sustainable Business Strategy defines our ambition for a continuously improving modern slavery risk and reporting program.

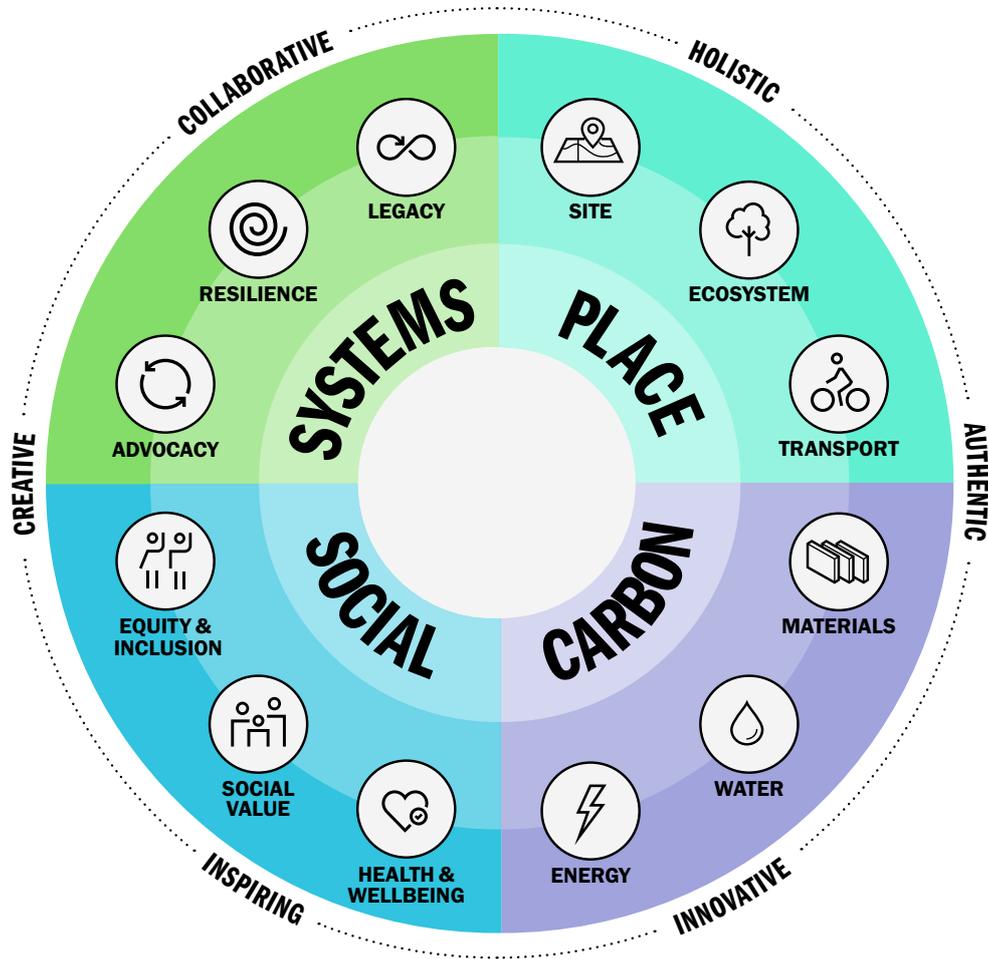
This includes the recent changes to our practices aimed at raising awareness of modern slavery in our industry, improving access to our grievance reporting mechanisms, and advancing human rights more broadly; more information can be found on pages 13–15.

Our Framework will be reviewed and updated regularly as we reflect on internal and external changes to our context and environment. In FY2025 we set out our approach for reviewing the Framework.

This approach involves both internal engagement with Hassell employees, and external engagement with clients, consultants and collaborators. It offers the opportunity for all employees globally to shape the Framework update based on their perspectives, insights, and level of ambition, through in-person sessions in all studios and via online platforms.

External engagement ensures alignment of the Framework with the values and needs of our clients and collaborators. We will exercise our plan to update the Framework in FY2026.

Diagram 3 – Sustainability Framework



Our B Corp Certification

In August 2024 Hassell joined a community of over 10,000 authentic impact-led businesses by becoming a Certified B Corp.

Our status as a B Corp demonstrates our commitment to high standards of social and environmental performance, transparency and accountability, and we are proud to be part of a growing movement striving to redefine success by using business – and design – as a force for good.

The process to become a B Corp required completion of a rigorous third-party verification process, involving an assessment of our positive practices and due diligence over any potentially sensitive practices, issues, or outcomes associated with our business.

After having our practices assessed against B Lab’s impact categories of governance, workers, communities, environment, and customers, we certified with a total of 84.4 points.

In April 2025, B Lab launched its most progressive set of standards to date, responding to the demands and expectations of today’s complex and evolving sustainability and impact landscape.

As these standards come into effect, there has never been a greater opportunity to work alongside like-minded organisations to achieve meaningful and authentic change for the benefit of our communities and the planet.



UNDERSTANDING OUR MODERN SLAVERY RISKS

Identifying and assessing risks

Our approach for the identification and assessment of modern slavery risks in our operations and supply chains is informed by resources and guidance of relevance to the built environment. This includes materials published by KPMG and the Australian Human Rights Commission (AHRC), Grace Farms, the Property Council of Australia (PCA) and Edge Impact, the Office of the NSW Anti-slavery Commissioner, and the Institute for Human Rights and Business.

The key modern slavery risk factors within our industry continue to inform the basis of our modern slavery risk assessment. These multiple risk factors both individually and collectively heighten the risk of modern slavery in the built environment: vulnerable populations, high risk business models, high risk categories, and high risk geographies (refer to Diagram 4).

Being conscious and vigilant that the built environment sector is not immune to the risk of modern slavery, we continue to refer to and utilise the analysis of sector-specific modern slavery risk areas. Materials in the construction sector known to have indicators of higher modern slavery risk include steel, timber, stone, copper, iron, glass, bricks, and rubber, and the provision of construction labour is one of the highest risk service types.

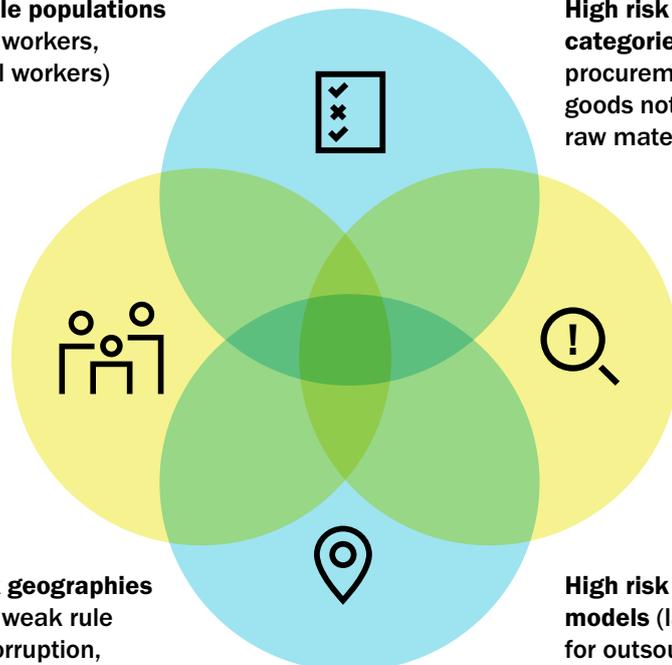
Our approach for identifying and understanding modern slavery risks more generally, including those outside of our industry, utilises recent information and guidance such as the '2023 Global Slavery Index' and 'Modern Slavery Risk Management: A playbook for Australian SMEs

to identify, manage and mitigate modern slavery risks' (2023) published by the United Nations Global Compact Network Australia (UNGCNA).

Diagram 4 - adapted from KPMG and AHRC's 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)

Updating our modern slavery risk assessment

In FY2025 we updated our assessment of salient modern slavery risks within our operations and supply chains. While not specifically required by the Australian and UK Acts, we also updated our assessment of modern slavery risk indicators in relation to our delivery of design and architecture services, recognising our influence in material, product, and service selection in the built environment sector.

In doing so, we continued to align our approach to that of the ‘United Nations Guiding Principles on Business and Human Rights’ (UNGPs). For FY2025, this comprised:

- Taking a victim-centred approach that focused on vulnerable populations by assessing the risk-to-people, rather than the traditional risk-to-business approach practiced in operational risk management; and
- Adopting the continuum of involvement in our assessment, denoting whether we may cause, contribute to, or be directly linked to modern slavery practices through our operations and supply chains

To assess risks specific to our industry we referred to the most relevant and up to-date resources available as of 30 June 2025, including:

- Grace Farms Foundation. (2024). *Design for Freedom International Guidance & Toolkit*
- Office of the NSW Anti-slavery Commissioner. (2025). *GRS Inherent Risk Identification Tool (IRIT) v2.0*
- Office of the NSW Anti-slavery Commissioner. (2025). *GRS Resource: Modern Slavery Risks in Construction: An Overview*

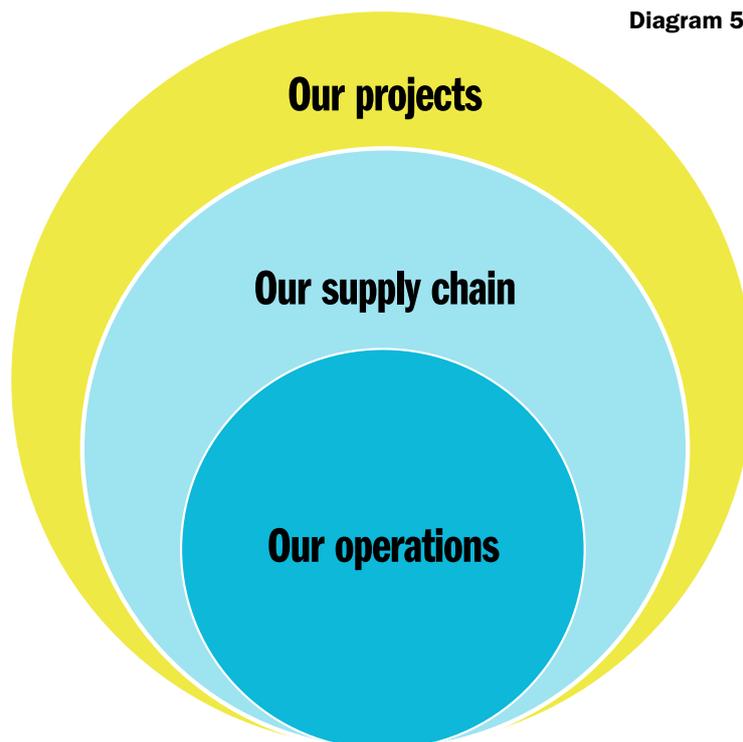
To inform our understanding of modern slavery risks in our operations and supply chain more generally, we utilised the following resources, amongst others:

- Minderoo Foundation. (2019). *Beyond Compliance in the Hotel Sector: A review of UK Modern Slavery Act statements.*
- Minderoo Foundation. (2023). *The Global Slavery Index 2023.*
- Minderoo Foundation. (2024). *Beyond Compliance in the Electronics Sector: Assessing UK and Australian Modern Slavery Act statements.*

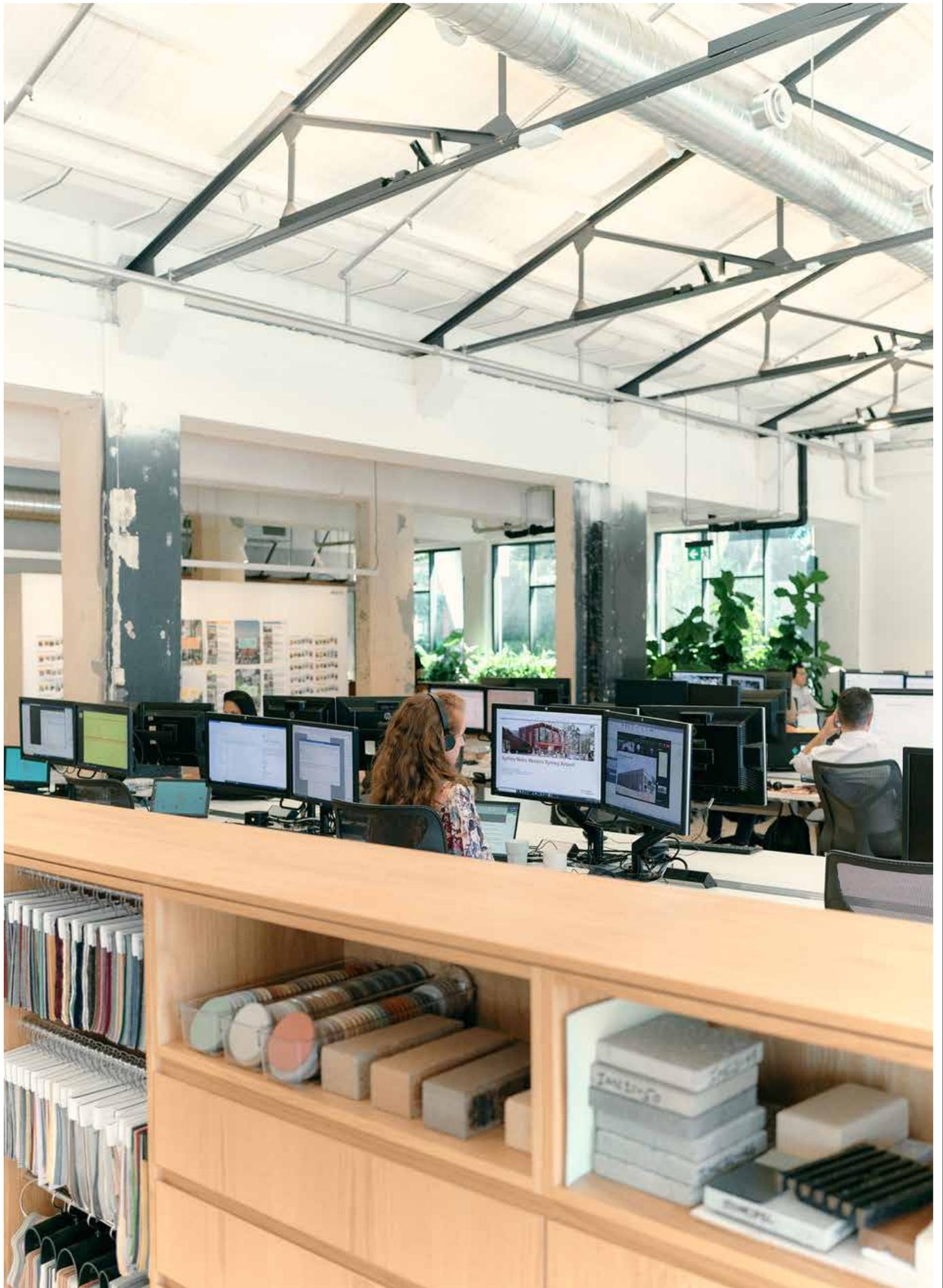
Our risk assessment was also reviewed in consultation with stakeholders across the organisation, including our People and Culture, Commercial, Technology, and Sustainability teams. The risk assessment will continue to be reviewed and updated at least annually. We acknowledge that standalone or ‘hotspot’ modern slavery risk assessments that are reviewed and updated on a recurring basis may not identify all modern slavery risk areas impacting our business. In FY2025 we commenced the targeted identification and assessment of modern slavery risks when making procurement decisions as we implemented our new Sustainable Procurement Policy.

A summary of our modern slavery risk assessment is found overleaf on page 11. Our modern slavery risk assessment is an important component of our modern slavery risk and reporting program and is key to informing the actions we have taken during the period, alongside the best practice guidance and resources referred to throughout this section. Refer to pages 13–15 for our FY2025 actions.

Diagram 5



Area	Risk(s) identified	Ongoing actions and next steps
Our operations	<p>The inherent level of modern slavery risk within our operations for our directly employed staff is deemed low, given the workplace protections in place that comply with applicable labour rights legislation where we operate.</p> <p>We 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 surveys.</p>	<p>Continue to comply with applicable labour rights legislation, and provide a healthy, safe, inclusive, and equitable workplace for our staff.</p>
Our supply chain	<p>We have identified a number of risk areas that warrant further action in our procurement and purchasing processes and practices, including:</p> <ul style="list-style-type: none"> → Higher risk supplier categories – includes cleaning services and supplies, catering services and supplies, security, technology equipment and services, office equipment and supplies, building repairs and maintenance, courier/postage, waste management, hotels and accommodation, and event equipment hire → Higher risk geographies – such as parts of the wider Asia and Middle East regions subject to weaker human rights and worker protections. → Higher 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. 	<p>Areas of higher modern slavery risk are addressed through our evolving approach to supplier screening and evaluation.</p> <p>Our Sustainable Procurement Policy and associated strategy came into effect during FY2025, which requires the screening of suppliers’ environmental and social performance, including their policies and practices to combat modern slavery and human trafficking.</p> <p>We will continue to engage with our suppliers to promote awareness and understanding of our expectations regarding human rights and ethical conduct. We encourage them to take steps to eradicate modern slavery and human trafficking from their operations and supply chain.</p>
Delivery of services / our projects	<p>We have identified a number of higher risk areas that warrant further action in our materials specification and related project processes, including:</p> <ul style="list-style-type: none"> → Construction materials – bricks, clay, copper, glass, minerals (e.g., mica, gypsum, silica), rubber, steel and iron, stone / granite, textiles (e.g., carpets, rugs, upholstery, bedding), timber, precursors (e.g., lime, cement) → Equipment and infrastructure – solar panels / PV arrays / polysilicon, electrical componentry → Construction labour 	<p>Areas of higher modern slavery risk arising from the materials and services on our projects are being addressed through due diligence reviews and supplier engagement on individual design projects. This includes application of our Go/No-Go Values and Purpose Alignment Policy.</p> <p>We have identified the need for, and value of, globally consistent practices and processes and have embedded key actions to identify and address modern slavery risk into our Materials Strategy and Implementation Plan.</p>



ACTIONS TAKEN

During FY2025 we continued improving our modern slavery risk and reporting program, seeking to respond and adapt to evolving best practice guidance and maintain alignment with the ambition and actions of our Sustainability Framework. Our actions during the period are described below.

Modern Slavery Advisory Group

The primary purpose of Hassell's Modern Slavery Advisory Group is to drive continuous improvement in our modern slavery risk program and support the preparation of our modern slavery statement each year. Our Advisory Group includes representatives from our key business functions and from each of our regions and operating entities in these regions, with each member maintaining a focus on providing specialist advice based on their respective role within our organisation. Our Sustainable Business Leader retains the operational responsibility for maintaining the modern slavery program.

Regular engagement between Advisory Group members provides the requisite forum for the sharing of specialist knowledge across our organisation, from both business functions and our practice disciplines. During the year we reflected on the composition of the Advisory Group and made several changes to its membership to ensure adequate representation and coverage of all geographic regions in which we operate.

Risk management integration

Throughout the reporting period we continued to monitor the changing nature and context of environmental, social, and governance (ESG) risks locally, nationally, and globally. With ongoing developments to ESG regulation, including the introduction of mandatory climate reporting in Australia, and heightened stakeholder expectations concerning the management of ESG risk and opportunity, we recognised the need to build knowledge and capability on this evolving risk context. Our approach to strengthening capability will be developed alongside the review of our Risk Management Policy and associated protocols, which is currently underway and will continue during FY2026.

Sustainable procurement strategy

During the year we implemented our sustainable procurement strategy across all business functions and all our studio locations globally. To support the rollout of the strategy we facilitated tailored briefing sessions on sustainable procurement to our studio Managing Principals, affected business functions, and business support teams in each studio.

These sessions were complemented by an online training module targeted at Principals and Team Leaders that focuses on the implications for sub-consultant engagement and screening.

All staff were notified of the new strategy via our organisation-wide news channels and the associated materials were made available on our intranet, namely the:

- Sustainable Procurement Policy
- Sustainable Procurement Guide
- Sustainable Procurement Questionnaire (Small-Medium Enterprises)
- Sustainable Procurement Questionnaire (Corporates)
- Supplier Code of Conduct

While our Sustainable Procurement Policy is now in effect, we recognise the need for ongoing guidance and support to raise awareness of our approach for sustainable procurement and to foster adherence.

Supplier and partner engagement and evaluation

During the year we continued to operate our approach for assessing and taking action on modern slavery risks in our supply chain, including via reduced reliance on supplier self-assessment questionnaires, or SAQs, to identify and evaluate suppliers where we suspect indicators of higher modern slavery risk.

We continued performing targeted due diligence of supplier modern slavery risks and their associated practices to address these risks, now a formalised process as part of our recently implemented sustainable procurement strategy.

While we have commenced proactively engaging with suppliers to raise awareness of modern slavery and provide advice and support, we recognise that there are opportunities to mature our approach for direct supplier engagement on modern slavery risk, which we look to act on moving ahead.

This year we continued to disclose our practices for addressing modern slavery risk through the online self-assessment questionnaire developed by Informed 365 and the PCA. In completing this assessment, we have shared our responses with a selection of organisations that we regularly collaborate and partner with, which can be accessed via the Informed 365 platform at any time. We encourage organisations utilising the Informed 365 platform to engage with us if access to our responses on modern slavery practices supports their respective modern slavery programs.

Sub-consultancy partner agreements

Alongside the implementation of our sustainable procurement strategy, we took the opportunity to update our sub-consultancy agreement templates. Our existing contractual provisions on modern slavery were replaced with a new clause requiring sub consultants to acknowledge and read our Supplier Code of Conduct and agree to comply, including adherence with our expectations on modern slavery and human rights.

Values and Purpose Alignment

In FY2025 we introduced our new Go/No-Go Values and Purpose Alignment Policy, which sets out how we assess the potential contribution to adverse human rights impacts in our value chain. This policy applies to our Go/No-Go process and ensures we understand the potential impacts of our work, manage risks, and track our involvement in key industries transparently.

Leveraging the UNGPs and B Lab's Risk Standards and Controversial Issues Guidance, as well as our Sustainability Framework and our Purpose and Values, it is broader in scope than modern slavery, requiring our people to consider several key questions when making decisions about future design projects:

- How does this Client and Project align with our purpose?
- What are the risks of doing this project?
- Who might this project impact?
- What are the opportunities for positive impact?
- Could there be unintended negative impacts of doing this project?

Through this process, we're able to make clear, evidence-based decisions and avoid engaging in work where we may contribute or be linked to adverse human rights impacts, including the perpetuation of modern slavery.

Grievance reporting mechanisms

In FY2025 we continued to operate our Speak Up Platform and ensure that all staff were aware of how to use the platform. Speak Up provides a means for our people to anonymously report any incidents of unsafe or inappropriate behaviour within or outside the workplace, such as alleged instances of harassment, bullying, discrimination, code of ethics breaches, bribery, corruption, environmental incidents, and similar issues. The platform is also an anonymous whistleblower platform and can be used to report any suspected instances of modern slavery in our operations or supply chain.

As we commenced the implementation of our sustainable procurement strategy, we included the details of our Speak Up Platform within our Supplier Code of Conduct, encouraging supplier organisations to notify us of any suspected or alleged

compliance and/or ethical issues or breaches of the Code while working with or for Hassell.

During the reporting period, we have not identified any instances of modern slavery in our operations nor supply chain. We do, however, recognise the complexity and opacity of global supply chains, and will continue to improve our processes for gaining transparency and insight into our supplier networks so that we are suitably informed of, and can act on, potential instances of modern slavery should they occur.

We will also investigate the need to develop dedicated procedures to effectively respond to identified instances of modern slavery in our operations or supply chain. At present, any such instances would be responded to in accordance with our existing policies and procedures.

Training and awareness

This year we rolled out our new online learning module on modern slavery, launching globally to all of our staff on the International Day for the Abolition of Slavery, 2 December 2024. The mandatory training module 'An Introduction to Modern Slavery' is now available via our online learning platform, providing learners with key information about modern slavery and Hassell's stance on and action towards combating this issue.

The module has been tailored to our context and needs, helping to foster a common understanding of the issue of modern slavery generally, as well as its presence and implications in the built environment. The module also outlines Hassell's responsibility to alleviate modern slavery in our sector, providing information on the purpose and actions of our modern slavery risk and reporting program.

As of 30 June 2025, the training module had been accessed and completed by 320 staff since its launch. Moving forward, the module is to be completed during our new starter onboarding program.

Materials research and selection

In FY2024 we established a Materials Advisory Group to guide the development of new systems and processes that strengthen Hassell's approach to material selection, specification, and design at a global scale. Their work culminated in the creation of a Materials Strategy, which we began rolling out in FY2025, and this roll out will continue in FY2026.

A large part of this strategy is the ambition to apply a globally consistent set of social and environmental parameters to every product included in our materials libraries. These same criteria will enable designers to assess materials with greater clarity and confidence in their projects. While some teams have already introduced project-specific material frameworks—such as modern slavery risk assessments—the strategy provides a unified standard for evaluating risks and opportunities across all materials we specify.

To support this shift, we have been exploring the best ways to digitally collate and share Hassell's materials research. This will allow side-by-side comparison of products through their environmental and social attributes. We have now invested in a digital materials framework, which will be populated and tested with project teams, starting in the first half of FY2026.

Human rights program

During the reporting period we continued to monitor developments in human rights due diligence standards and regulations, in particular the human rights and environmental due diligence legislation in the European Union. We also welcomed B Lab's new standards that were launched in April 2025, particularly the new Human Rights Impact Topic.

As in the prior period, we continue to take steps to design the structure of a more holistic program to address the broader spectrum of human rights risks and issues in our operations and value chains. Tailored to our industry and our context, our human rights program is being designed to identify, assess, and respond to human rights risks in four key areas:

- Our studios & our people
- Our direct supply chain
- Our locations of work & our clients
- Our projects

This program will continue to be developed in FY2026, with implementation completed ahead of our B Corp recertification in FY2028.

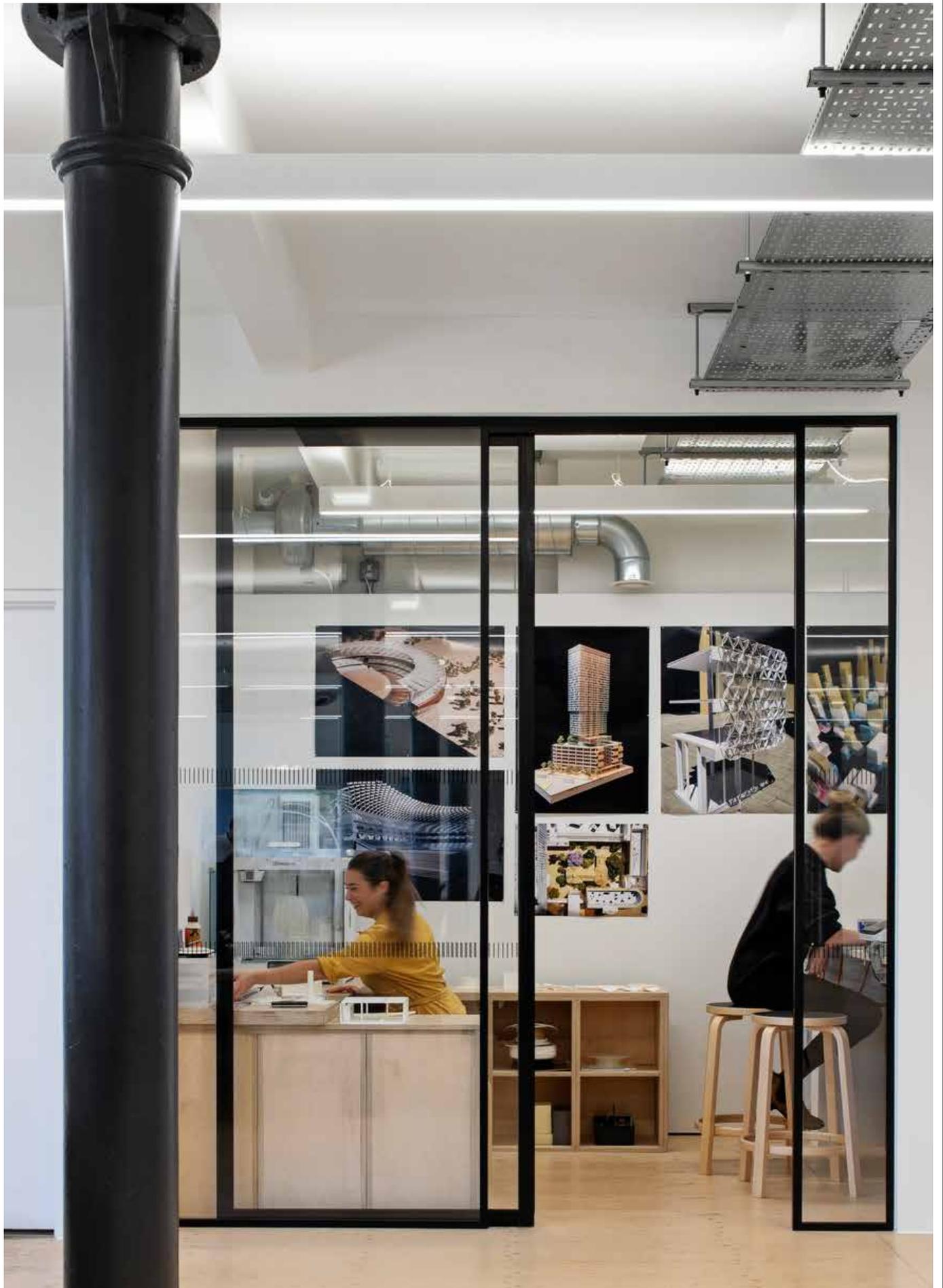
Industry engagement

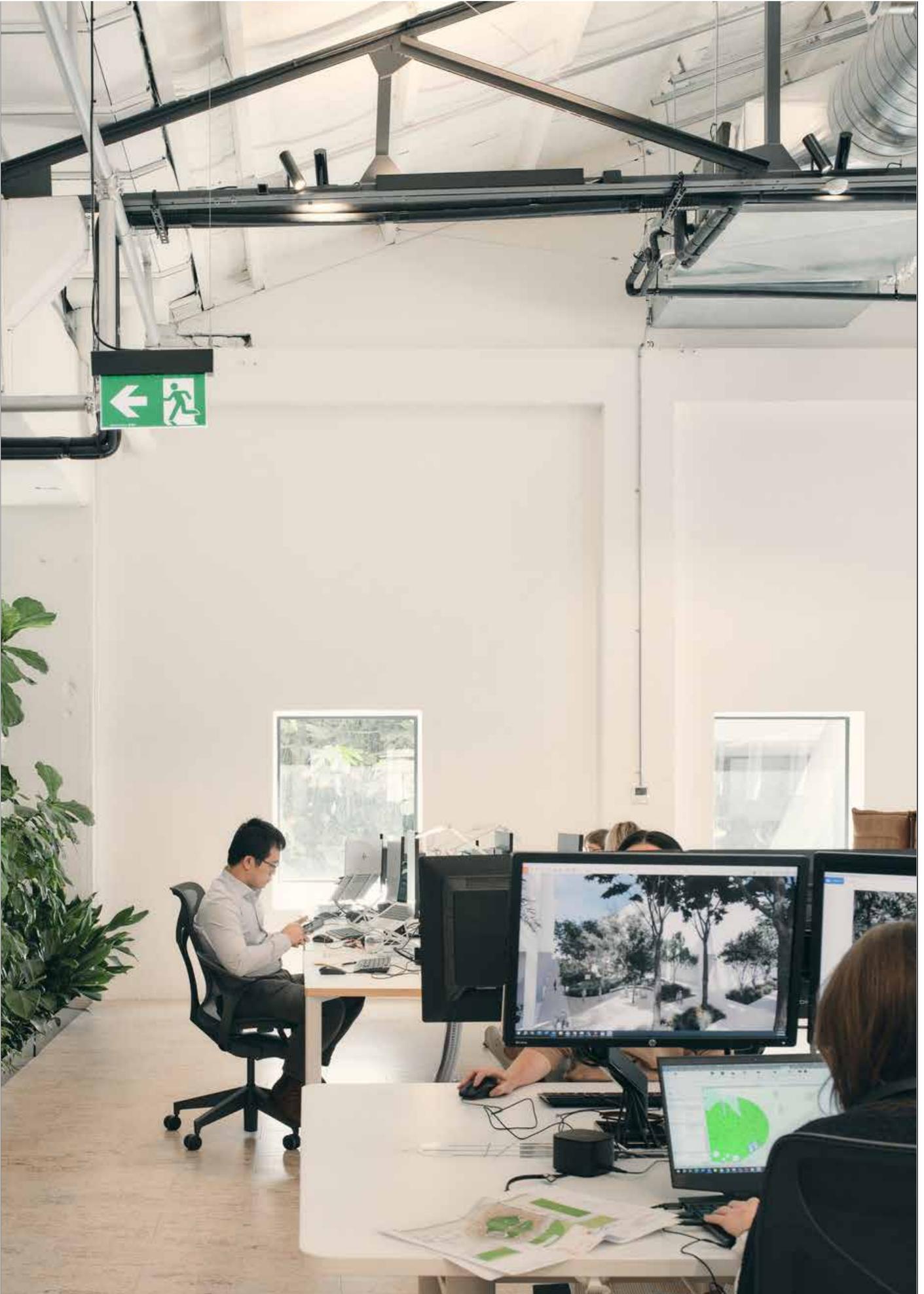
During FY2025 we remained committed to active engagement in industry to continue to build our knowledge and expertise on modern slavery risks and issues. We maintained our involvement with the UNGCNA, including as a participant

of the Modern Slavery Community of Practice. We regularly attended UNGCNA knowledge-sharing and capacity-building events on business and human rights, such as the 2024 Australian Dialogue on Business and Human Rights in Sydney. We also attended the 2024 and 2025 Online Anti-slavery Forums hosted by the Office of the NSW Anti-slavery Commissioner.

We engaged in a number of consultation opportunities throughout the year, including the Strategic Plan 2025-2028 Consultation organised by the Australian Anti-Slavery Commissioner and the Business Consultation facilitated by the United Nations Development Programme in the lead up to the UN Responsible Business and Human Rights Forum 2025.

Our involvement and engagement helps us to access to diverse experience and expertise on business and human rights issues and developments, including on modern slavery, across a breadth and depth of case studies, research, data, and best practice insights. Our active participation also provides an opportunity for sector-specific advocacy, by raising the profile of modern slavery issues, challenges, and opportunities that exist within the built environment.





ASSESSING EFFECTIVENESS & CONSULTATION

Assessing effectiveness

In FY2025, we took the opportunity to review and update the key performance indicators (KPIs) we use to monitor the effectiveness of our modern slavery risk and reporting program. Our revised KPIs draw from the guidance developed by the PCA and Edge Impact during the reporting period, 'Impact Metrics for Addressing Modern Slavery in Property and Construction'. Metrics within the PCA/Edge Impact measurement framework were reviewed for their relevance to Hassell as a design practice, then mapped against our four areas of focus:

- Governance, ethics, and risk
- Procurement and supply chain
- Grievance reporting and remediation
- Training and awareness

We continue to monitor our progress against our revised KPIs via our modern slavery monitoring dashboard. At present, much of the underlying data continues to be collected and collated manually. During the period we continued to plan our enhanced approach for data analysis and reporting as part of our impact reporting approach and alongside broader technology improvements across our practice.

Consultation and engagement

Our Modern Slavery Advisory Group includes representatives from each of our regions and operating entities in these regions. In preparing this Statement we consulted with all Hassell owned or controlled company entities through engagement with the Advisory Group representatives.

This included discussing the mandatory reporting criteria of both the Australian and UK Acts, and providing updates on emerging modern slavery risks, issues, and themes pertinent to the reporting period.

Beyond our internal consultation, we have engaged with a selection of the partners, suppliers, and vendors we purchase from, as well as with relevant industry organisations providing updated guidance and resources on best practice modern slavery risk management. Our progress in extending this type of engagement has been outlined in the actions section of this Statement (pages 13-15).

LOOKING AHEAD

The following items have been identified as priority actions for the next reporting period:

Priority action	Description
Progress the design and implementation of a human rights program	<p>The development of a human rights program was a priority action for FY2025 however, we did not achieve the extent of progress intended in its implementation.</p> <p>In FY2026 we will endeavour to develop, and then implement, a holistic program to address the broader spectrum of human rights risks and issues in our operations and value chains. This program will be aligned to relevant and recognised human rights frameworks and standards, namely the UNGPs and the requirements of the new B Corp Human Rights Impact Topic.</p>
Enhance ESG risk management capability and practices	<p>With a rapidly evolving ESG risk context, we will look to embed consideration and assessment of ESG risks within our Risk Management Policy and associated protocols. We will also build capability among our leaders and staff on how to identify and respond to emerging risk areas as part of existing risk assessment processes. This will be performed as part of design and implementation of our human rights program, as per the action above, in forming and fostering a risk-based approach to the management of human rights risks, including but not limited to modern slavery risk.</p>
Implement the 'specify better' actions of our materials strategy	<p>Our digital materials library is expected to be operational by the end of FY2026, with functionality to assess, record, and compare the modern slavery risk level of, and across, materials.</p> <p>Beyond this, we plan to integrate this research into our digital models, schedules, and specifications - supported by regular review cycles to refine our approach and ensure we continue to drive meaningful impact over time.</p>
Raise awareness and capability on value chain policies	<p>With our Go/No-Go Values and Purpose Alignment Policy, and Sustainable Procurement Policy now in effect, we will continue to engage with our leaders, designers, and business functions to support the ongoing uptake of these policies and ensure that they are implemented consistently and as intended.</p>
Improve staff training materials	<p>We plan to continue developing tailored catering for our context and need. Our next step is to create a learning module that provides practical guidance on how our designers can assess and act on modern slavery risk when specifying materials and products in their designs.</p>
Improve data management practices	<p>In FY2026 we will seek to update our accounting platform to allow the recording of the modern slavery risk level for each supplier we work with. This will support our modern slavery data collection, analysis, and reporting, allowing us to efficiently prioritise action on areas of our supply chain where there are indicators of higher modern slavery risk.</p>
Continue external engagement	<p>As in previous years, we will continue to be actively engaged with industry bodies and subject matter experts on modern slavery and human rights, including the UNGCNA's Modern Slavery Community of Practice. We will seek to expand our engagement with other businesses and practitioners in the built environment, to share knowledge, discuss challenges and opportunities, and explore approaches for ongoing collaboration.</p>

Australia and UK reporting criteria

To aid readers of this Statement, we have prepared the following table to denote the location of our responses to the reporting criteria of section 16(1) of the Modern Slavery Act 2018 (Cth) and section 54(5) of the Modern Slavery Act 2015 (UK) respectively.

Section 16(1): Australian Modern Slavery Act: Mandatory Reporting Criteria	Section 54(5): UK Modern Slavery Act: Reporting Criteria	Page
a) Identify the reporting entity		1
b) Describe the structure, operations and supply chains of the reporting entity	a) Organisation's structure, its business and its supply chains	3-4
	b) Organisation's policies in relation to slavery and human trafficking	5-7
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	c) Its due diligence processes in relation to slavery and human trafficking in its business and supply chains	9-15
d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	d) Parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk	
e) Describe how the reporting entity assesses the effectiveness of such actions	e) Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	18
	f) The training about slavery and human trafficking available to its staff	14
f) Describe the process of consultation with:		18
i. any entities that the reporting entity owns or controls; and		
ii. in the case of a reporting entity covered by a statement under section 14—the entity giving the statement.		
g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant		19-20

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