

MODERN SLAVERY STATEMENT

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INTRODUCTION

Architectus' FY2025 Modern Slavery Statement has been prepared in accordance with the reporting requirements of Australia's Modern Slavery Act 2018 (Cth). The statement describes:

- Our company structure, operations, governance, operations and supply chains
- Potential risks of modern slavery practices in our operations and supply chains
- Actions taken to assess and address risks of modern slavery in our operations and supply chains, and
- How we assess the effectiveness of our actions.

This statement is issued on behalf of Architectus Services HoldCo Pty Ltd. It encompasses all entities within the Architectus Group of companies operating in Australia under the trading name Architectus.

All entities, including subsidiaries, have adopted the policies, processes, and procedures concerning modern slavery outlined in this statement.

Additional details regarding our company structure are available on page 7 of this statement.

The information provided in this statement is correct as at 30 June 2025 unless otherwise noted. The statement was approved by the board of Architectus Services HoldCo Pty Ltd (ABN 31 654 274 629) in its capacity as the governing body of Architectus Australia Pty Ltd and its other related entities on 28 November 2025.

In Accordance with the Act's requirements, persons with authority have examined the contents of this Statement and verified its accuracy.

This statement is signed by Ray Brown in his role as CEO and Director on 28 November 2025.

A MESSAGE FROM THE CEO



Ray Brown
Architectus CEO

Like other large organisations in Australia, Architectus is operating in an increasingly complex, global marketplace where labour practices can vary significantly.

Unfortunately, human rights groups and other organisations tracking these activities are reporting a rise in modern slavery* internationally.

At Architectus we want to do our part to end exploitative labour practices. One of the most effective ways we can make a positive impact is by carefully looking at our supply chains.

Our aim is to ensure we collaborate with businesses and individuals who share our commitment to responsible, equitable, and safe ways of working – and avoid any that may be furthering modern slavery practices in design, construction, or other sectors where we may exchange goods and services.

This is our practice's third Modern Slavery Statement, and we are pleased to report on solid progress, building on the strong foundations we already put in place.

For the year ending 30 June 2025, we achieved all our committed actions, including the development and rollout of multiple relevant policies.

We were pleased to see a significant increase in our supplier response rates over the previous year, after we increased our focus on supplier engagement processes. During the year we also introduced software to support supplier qualification, rolled out human rights training for senior management, and made improvements to relevant policies.

Looking ahead, our practice will take steps to centralise and strengthen our learning capability and continue to directly engage with our supply chain through the strong processes we established this year.

Ultimately, our aim is to make our industry better and fairer for the people and organisations working with us.

A handwritten signature in black ink that reads "Ray Brown". The signature is fluid and cursive, with a long horizontal stroke at the end.

*The Australian Government defines modern slavery as a range of practices including human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, deceptive recruiting for labour or services, and child labour.

STRUCTURE,
GOVERNANCE,
OPERATIONS +
SUPPLY CHAIN

2.0 Structure, governance, operations + supply chain

Architectus is a design practice offering architecture, interior design, landscape architecture, urban design and planning, and digital design services across a wide range of sectors.

We design to make a positive and lasting impact on people, cities, and communities, combining deep expertise with critical problem-solving skills and a commitment to exceptional design.

As a unified force, we have nearly 700 talented designers and specialists working across our studios in Sydney, Melbourne, Brisbane, Perth, Canberra, Adelaide, Newcastle, Townsville, and the Gold Coast. We also have three associated studios in New Zealand.

2.1 Structure

This statement is made on behalf of Architectus Services HoldCo Pty Ltd, the ultimate holding company and its associated entities (Architectus).

This statement reports solely on Architectus Australia for the FY2025 period and does not include Architectus Aotearoa (New Zealand), a partially owned subsidiary.

The company structure is typical of a privately-owned services company where the Australian contracting entity, Architectus Australia Pty Ltd, is a subsidiary of the ultimate holding company.

2.2 Governance

Architectus is governed by a Board made up of both executive directors and non-executive directors. The Board presides over the Executive, Client, Operational, People, Delivery and Design Management Groups, a company structure that institutes best practice across all aspects of operations.

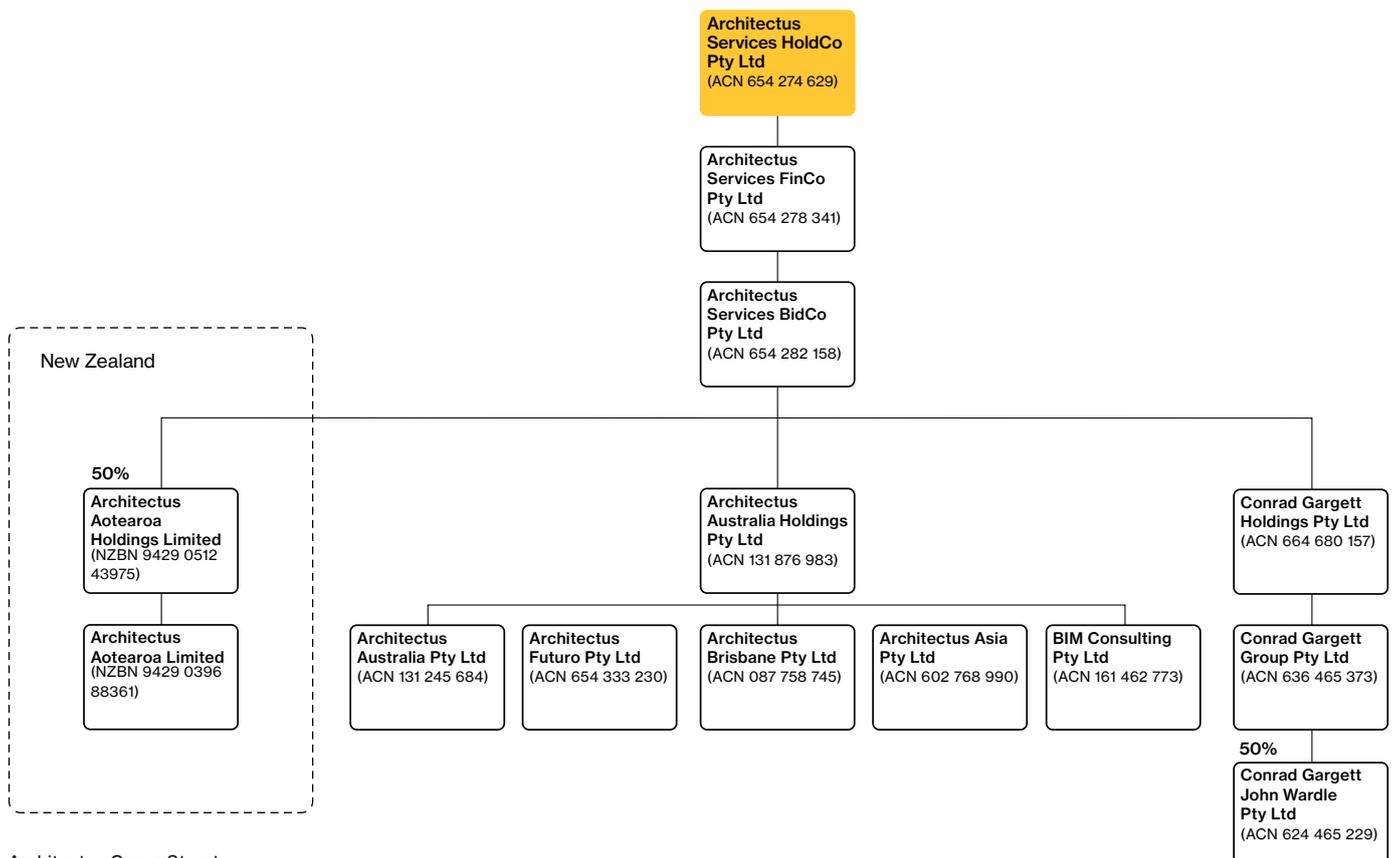
An Executive Management Group of several senior leaders regularly identifies, evaluates, and responds to key strategic, operational, and other risks in our practice.

The AMS Compliance Group (ACG) and the Design Leadership Group (DLG) oversee and report on a range of risk and audit activities, ensuring ongoing compliance with our management systems and legislation.

The Health, Safety & Environment (HSE) Group ensures a safe working environment is provided through consultation, risk reviews, and workplace inspections.

2.3 Operations

Our practice has studios in Sydney, Melbourne, Brisbane, Perth, Canberra, Adelaide, Newcastle, Townsville, and the Gold Coast. We also have a strong relationship with our associated New Zealand studios in Auckland, Christchurch, and Wellington.



Architectus Group Structure

2.0 Structure, governance, operations + supply chain

2.4 Supply chain

During the current reporting period, Architectus maintains contracts with more than 250 key direct suppliers and subcontractors spanning various sectors and industries. 69% of the services procured from these entities directly support the professional services Architectus delivers to clients, mostly comprising architecture, engineering, and other design consulting services. The majority of these suppliers are Australian-based entities, varying from large multi-national engineering firms to smaller Australian-based entities and individuals, including sole practitioners. Australia has a low inherent risk of modern slavery and therefore these services are considered low risk.

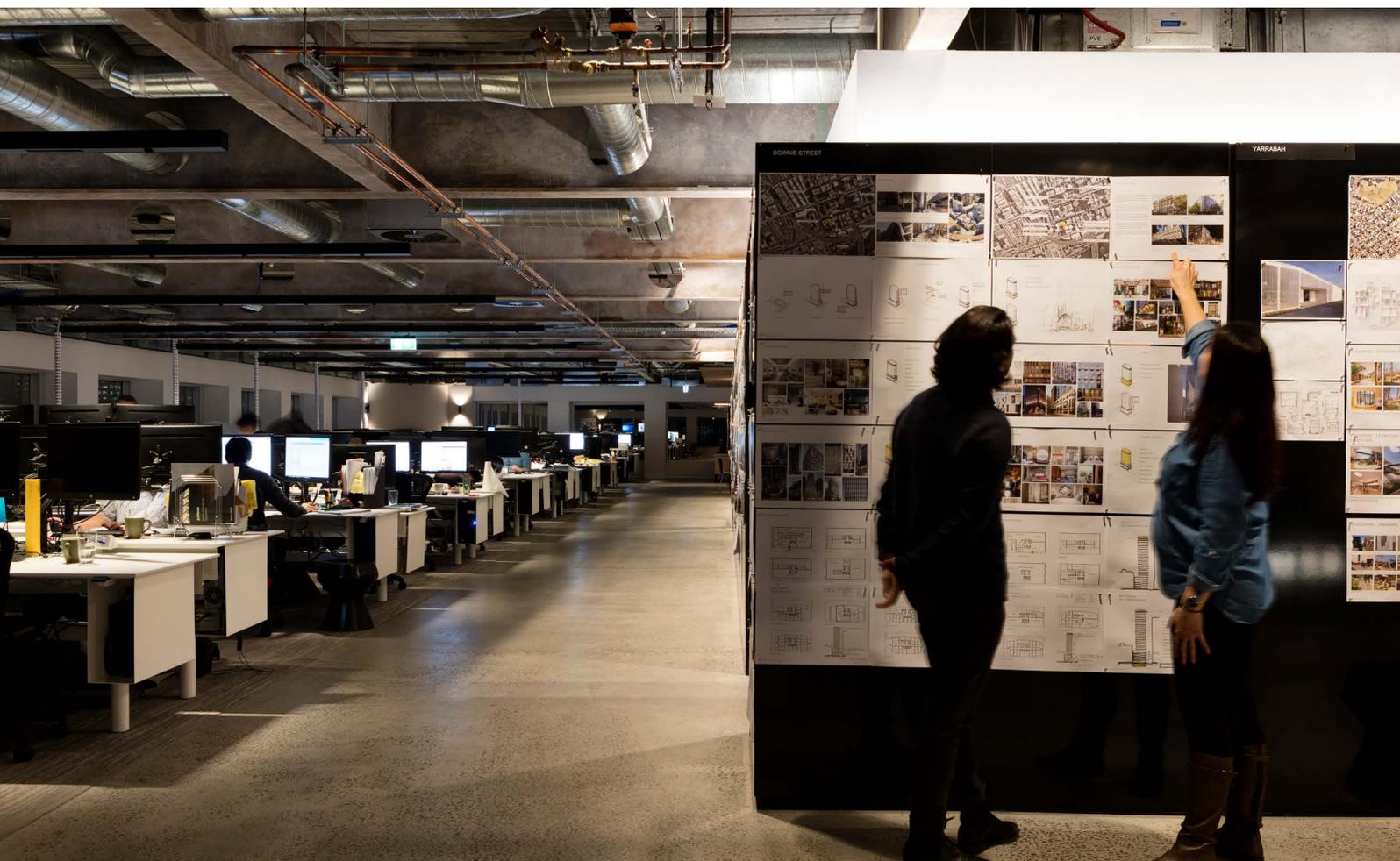
Architectus continues to proactively take measures to mitigate modern slavery risks within our supply chains. This includes the recent implementation of our Supplier Code of Conduct, further development of our Supplier Procurement Management Procedures, and working with suppliers from the previous reporting period who were identified as having a high relative risk of modern slavery within their supply chains. Through this engagement we

identify areas for improvement and provide corrective action plans designed to reduce modern slavery risk, with a focus on training, policy development, and addressing gaps in information or transparency.

Additionally, Architectus made Vendor Management System changes during the reporting period to enhance our ability to screen potential suppliers and improve the integration of existing Modern Slavery Risk Indicators within the pre-qualification and selection process.

We have observed encouraging progress through this approach. Several of our larger suppliers have reduced their risk rating, demonstrating the value of ongoing engagement and shared responsibility.

We will continue to work with all suppliers to strengthen their understanding of modern slavery risks and to increase participation in our online modern slavery risk assessments.





3.0

OPERATIONAL + SUPPLY CHAIN RISKS

3.0 Operational + supply chain risks

3.1 Operational risks

Architectus has a skilled and professional workforce based entirely in Australia. All staff are directly employed under Australian industrial relations laws, with permanent employment the predominant model across our practice. These arrangements are supported by an established suite of workplace and health, safety, environment and quality (HSEQ) policies and procedures, strong entitlements, clear grievance mechanisms, and well communicated expectations for safe and inclusive conduct.

We maintain structured recruitment practices, comprehensive onboarding, and ongoing employee support programs that further reduce the likelihood of any modern slavery risk arising within our operations.

Additionally, our practice has procurement processes that include due diligence assessments, defined approval pathways, and documented standards for supplier engagement. These controls reduce risk in areas where modern slavery risks may emerge, including third party services and supply chains.

Based on this operating environment and governance framework we assess the risk of modern slavery within our direct operations as low.



3.0 Operational + supply chain risks

3.2 Policies, processes and procedures

All Architectus employees are required to read all workplace and HSEQ policies and associated procedures and guidelines as part of our new starter onboarding process. These policies are also available to all staff on our intranet and shared with staff when policies are updated.

Workplace policies

We have policies addressing equal opportunity, the identification and prevention of workplace bullying, the resolution of workplace issues, the promotion of inclusivity and diversity, as well as access to support and leave when escaping or recovering from Family and Domestic Violence. These policies collectively aim to fulfill our responsibilities and obligations to provide a safe and equitable workplace. They also govern our standards of appropriate workplace behaviour.

Whistleblower Policy

This policy acts as a framework for receiving, investigating, and addressing allegations of improper conduct and the management of those involved.

Competition Law Policy

This policy clarifies our fundamental obligations and compliance requirements related to competition law, and governs how we interact with competitors, customers, and our supply chains. Additionally, Competition Law Compliance training is provided to all senior staff, annually.

Human Rights Policy

This policy outlines our commitment to respecting, protecting, and promoting human rights in all aspects of our operations and interactions with stakeholders, including employees, clients, contractors, suppliers, and the communities in which we operate.

Anti-Bribery and Corruption Policy

This policy sets out the responsibilities of employees and those working for us in observing and upholding our zero-tolerance position on bribery and corruption. It also serves as a source of information and guidance for dealing with these issues and understanding responsibilities.

Supplier Code of Conduct

The code sets forth our commitment to upholding the highest standards of ethical conduct in all our business dealings. It sets out our expectations for suppliers to conduct themselves with high ethical standards. Where appropriate, it also mandates requirements to ensure we conduct business together in a safe, accountable, and equitable manner.

The Code unequivocally condemns all forms of modern slavery, including forced labour, child labour, human trafficking, and debt bondage. We maintain a zero-tolerance approach towards these practices in our operations and supply chain.

Health, safety, environment, and quality policies

We have policies addressing our commitment to providing professional, ethical, and socially responsible services, ensuring a safe working environment free from health risks, and managing environmental impacts during procurement and supplier/subcontractor engagement processes. Together with our HSEQ objectives, these serve as measurable benchmarks for achieving company aims in health, safety, environment, and quality.

Management system procedures

Our management procedures are key to operating our business and delivering our projects in a responsible and compliant manner. They support the company to achieve our objectives, manage our business operations, and safeguard compliance.

The management procedures also extend to our supply chain in meeting the needs and expectations of Architectus and our clients. This includes how any issues related to performance and behaviour are raised and addressed.

The procedures also provide guidance to our employees, clients, and suppliers about raising any concerns so they can be addressed by the appropriate management representative in a timely manner.

3.0 Operational + supply chain risks

3.3 Supply chain risks

Architectus works alongside external subject matter experts to carry out modern slavery risk assessment of our supply chains and operations, including requesting all key suppliers to complete an online self-assessment form.

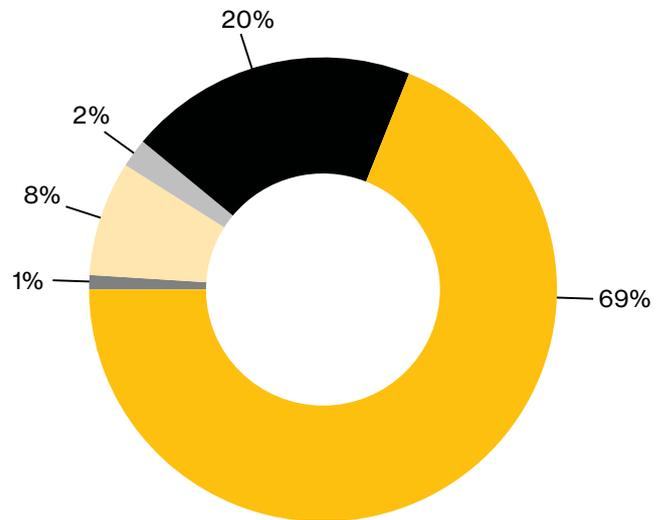
For the purposes of this statement, we have reviewed the responses from suppliers of goods and services during the reporting period. These respondents represent over 74% of our FY2025 supply chain supporting the operation of our practice. This represents a significant increase in respondents compared to our base reporting year in FY2023.

The risk assessment concluded that 96% of the companies that supplied services to Architectus were Australian companies and, consequently, considered low risk. (At a country level, Australia has a low inherent risk of modern slavery). In addition, we did not identify any actual or suspected cases of modern slavery in our operations or supply chains.

Architectus' suppliers operate, produce, and source across several industries. Some of these industries can be described as high risk. Our identified industries with elevated risks for modern slavery include construction, accommodation and food service activities, retail, and manufacturing. To mitigate these risks, all these services are presently provided by Australian entities.



FY2025 Supply Chain



Total FY2025 supply chain spend by category

Legend

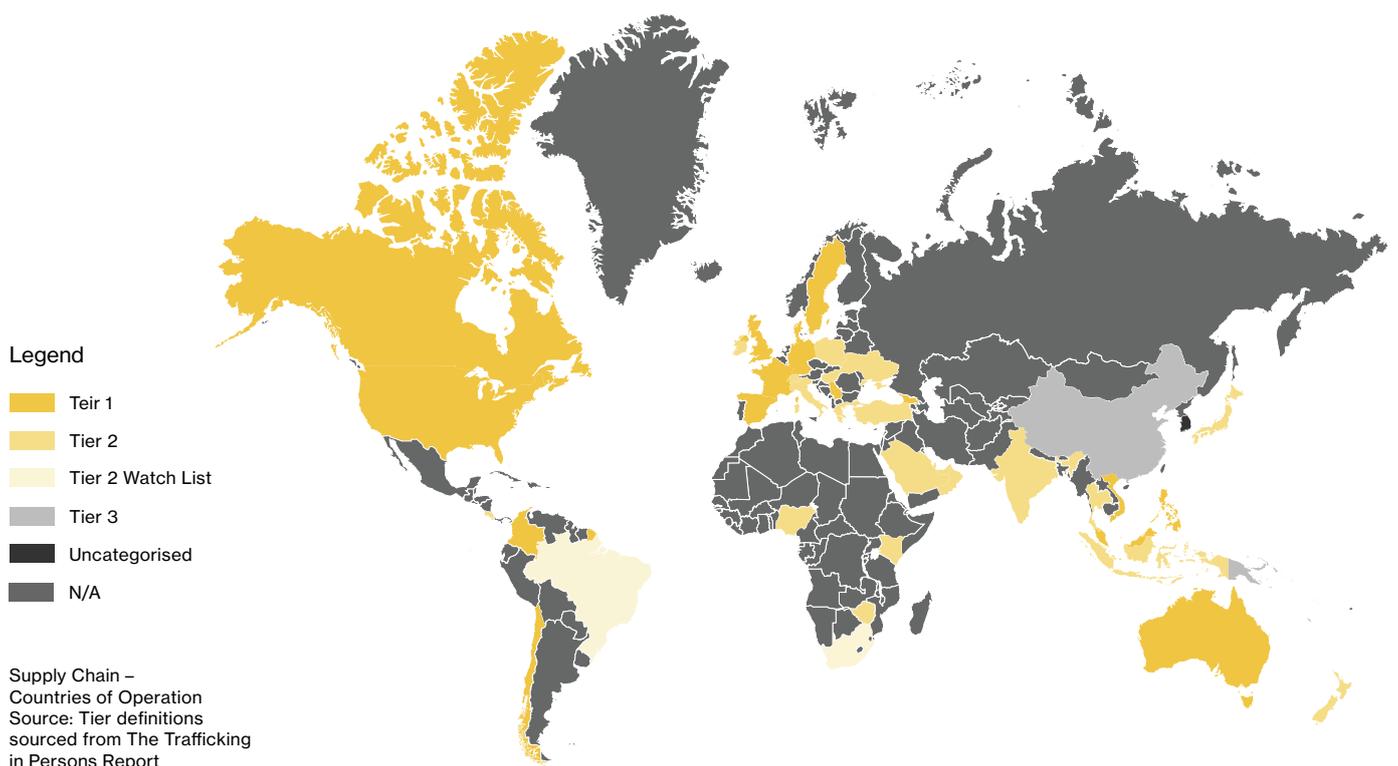
- Subcontracted Services
- Human Resources
- IT & Technology Services
- Professional Services
- Property & Operations

3.0 Operational + supply chain risks

According to the International Labour Organisation, around 50 million people worldwide were living in situations of modern slavery in 2021. In response, governments and regulators increasingly emphasise supply chain transparency and business due diligence as key strategies to identify, prevent and remediate modern slavery risks in both operations and procurement activities.

Suppliers operating in countries with governments not fully meeting (or making significant efforts to reach) the minimum standards outlined in the Trafficking Victims Protection Act (TVPA) include China, Cambodia, Macau, and Papua New Guinea. Of our international supply chain, only one supplier, representing less than 0.5% of our total supplier base, operates in a country identified as having a high risk of modern slavery. This supplier provides rendering services for project work and is categorised within the IT Services sector, which is generally considered low to moderate risk.

| Supply Chain Internationally | | |
|------------------------------|---|------------|
| Location | Services | Percentage |
| Hong Kong | IT & Technology Services | 0.40 |
| Denmark | Subcontracted Services | 0.30 |
| Spain | Subcontracted Services | 0.80 |
| Netherlands | IT & Technology Services Subcontracted Services and IT & Technology Services | 0.40 |
| New Zealand | Technology Services | 1.20 |
| Poland | Subcontracted Services | 0.40 |
| Singapore | IT & Technology Services | 0.40 |
| UK | IT & Technology Services | 0.8 |
| USA | IT & Technology Services | 0.40 |





4.0

ACTIONS
TAKEN

4.0 Actions taken

Architectus is devoted to ongoing improvement in addressing modern slavery. Throughout the reporting period, we have acted on our commitments and introduced further due diligence measures and initiatives, as detailed on the right.

| | |
|---|---|
| Human rights training | We achieved a 100% completion of human rights training for all senior management. |
| Performance and Conduct Policy | We developed a Performance and Conduct Policy that sets clear expectations for performance and respectful and appropriate conduct. |
| Review of high-risk supply chain respondents | <p>We completed comprehensive risk assessments that prioritised suppliers with the highest relative risk of modern slavery within their supply chains. The outcomes of these assessments directly informed targeted improvement plans, including corrective actions and clear expectations for progress.</p> <p>Through this targeted approach we ensured that higher risk suppliers were actively monitored, engaged, and supported to strengthen their governance and work towards full alignment with their modern slavery obligations.</p> <p>As a result of this work, several of our larger suppliers have reduced their risk rating.</p> |
| Supply chain monitoring and central supplier management software | <p>We strengthened our supplier engagement processes by embedding modern slavery obligations and indicators into both onboarding and ongoing monitoring.</p> <p>We implemented specialised supplier management software, enabling structured onboarding, consistent risk assessments, transparent documentation, and clearer tracking of improvement actions.</p> <p>This work has enhanced our visibility of higher risk suppliers and strengthened our auditability and due diligence across the supply chain.</p> |



5.0

OUR
COMMITMENT
TO ACTION

5.0 Our commitment to action

We will continue to use the results and insights of the modern slavery risk assessment survey to inform our responses and actions in addressing modern slavery risks beyond the current reporting period.

Enhanced Employee learning

We will expand the scope of our human rights training program, making it accessible to all management employees within the business. We will also review content for the annual refresher training to ensure it is current and relevant.

We will consolidate our learning management system to centralise all learning, strengthening our ability to deliver and report on compliance training. This work will include a review of our anti bribery and corruption training and the introduction of modern slavery risk mitigation.

Policies and procedures

Along with the Human Rights, Anti-Bribery and Corruption, and Supplier Code of Conduct policies introduced, we will continue to review and update our policies and documentation to ensure stronger and more explicit coverage of identify modern slavery risks.

To build on this work, we will:

- develop a recruitment and selection policy that embeds responsible employment practices
 - develop a performance and conduct policy that sets clear expectations for respectful and accountable behaviour across the practice, and
 - establish procedures for identifying and responding to goods and services that may be tainted by modern slavery, including steps for escalation, investigation, and remediation if required.
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6.0

APPROACH TO ASSESSING EFFECTIVENESS

6.0 Approach to assessing effectiveness

We remain dedicated to the ongoing enhancement of our processes and activities that assess modern slavery risks within our operations and supply chains. This commitment was evident in the previous financial year through the implementation of supply chain monitoring processes, central supplier management software, and enhanced senior management training.

By holding ourselves accountable to the actions outlined in this statement, we aim to foster both a cultural mindset and everyday practices that help our staff recognise any potential areas of concern and address them thoughtfully and efficiently. The aim is to learn from experience and feedback during our due diligence processes to improve our processes and results in the future.

We will also conduct an annual review of our relevant policies to ensure they comply with the latest regulatory requirements and that the definitions of high-risk countries remain current.

FY26 Key Performance Indicators (KPIs)

Architectus has introduced the following KPIs to measure the effectiveness of our actions for the next reporting period:

| | |
|------------------|---|
| People | <ul style="list-style-type: none">– Achieve a 100% completion rate for human rights training and anti-bribery and corruption training among senior leaders who are the decision makers for our supply chain– Achieve a 90% completion rate for human rights training and anti-bribery and corruption training among the management group in an effort to raise awareness– Target zero modern slavery complaints through the grievance mechanism |
| Suppliers | <ul style="list-style-type: none">– Ensure 100% of new suppliers receive the Architectus supplier code of conduct and modern slavery questionnaire during the onboarding process– Achieve a minimum 75% completion rate on the annual Modern Slavery questionnaire by active suppliers– Investigate and assess 100% of all high-risk respondents identified in the Modern Slavery questionnaire |

We are dedicated to collaborating with our suppliers to eradicate modern slavery in the workforce and will continuously monitor any high-risk supplier for measurable and consistent improvements in meeting modern slavery obligations.

We will also continue to evaluate, enhance, and strengthen the effectiveness of our modern slavery risk processes, leveraging the insights we have gathered over the past three years.

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