

# Modern Slavery Statement FY2022

Woods Bagot Holdings Pty Ltd  
ABN: 63 008 210 106

## 01 Introduction

Woods Bagot Holdings Pty Ltd (Woods Bagot) is opposed to slavery in all its forms, including slavery, servitude, forced labour, human trafficking, deceptive recruiting for labour or services, debt bondage, forced marriage, and the worst forms of child labour. We are committed to ensuring that there is no modern slavery in any part of our own business or in our supply chains. We strive to achieve this by acting ethically, with integrity and transparency, and by acting in accordance with our policies, standards, and principles.

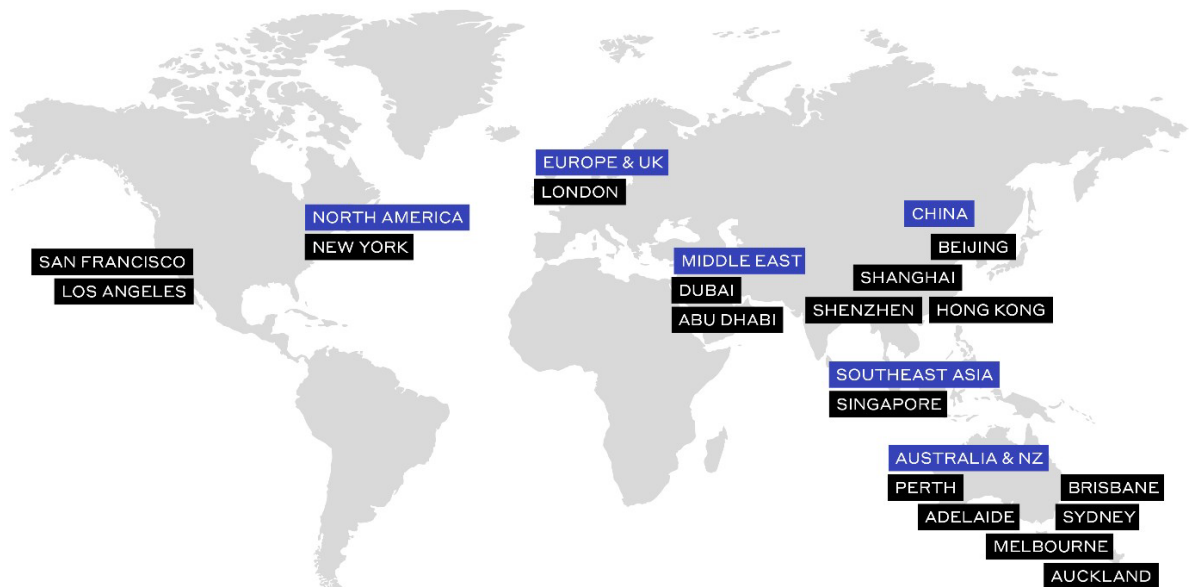
This statement has been prepared in accordance with the reporting requirements of Australia's *Modern Slavery Act 2018* (Cth) (see Annexure), the United Kingdom's *Modern Slavery Act 2015* and associated guidelines. It describes the steps taken by Woods Bagot during the financial year ending 30 June 2022 to assess and address the risk of modern slavery occurring in our operations and supply chains.

This statement applies to Woods Bagot and the entities it owns or controls, within Australia and overseas, trading as Woods Bagot and ERA-co.

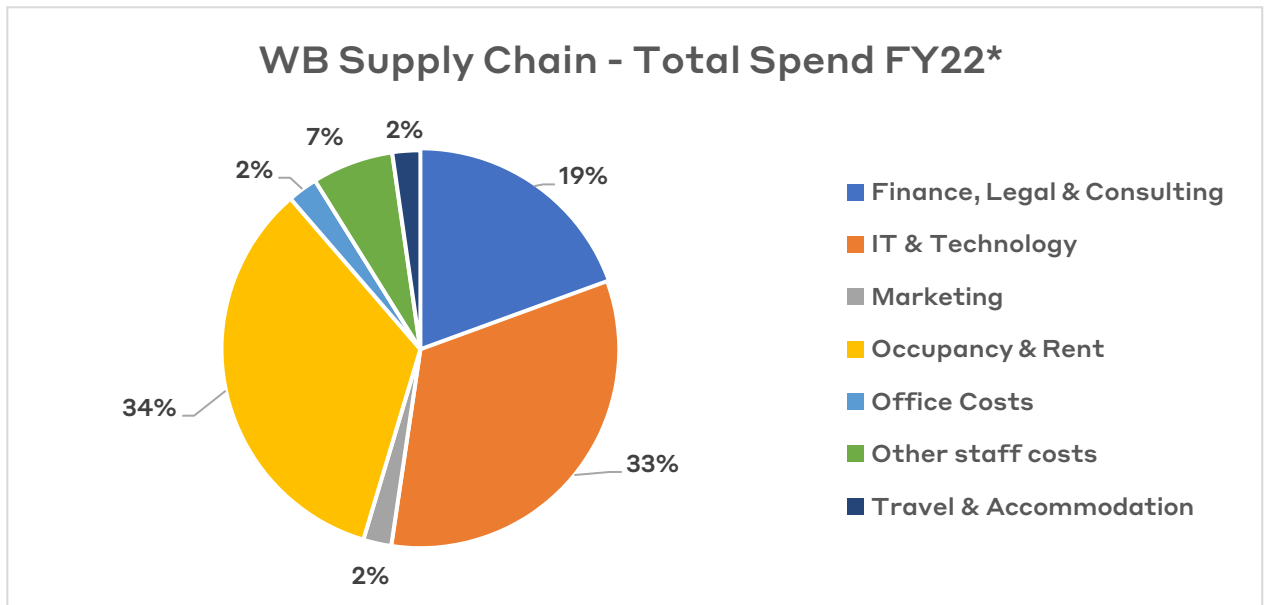
## 02 Our Structure, Operations and Supply Chains

Woods Bagot is a global architecture and consulting firm specialising in the design and planning of buildings and projects across a wide variety of sectors including workplace, retail, residential, transport, education, science and health, hotel, and convention centres.

Wood Bagot's registered office is in Melbourne, Australia. We operate studios in 17 locations globally with over 1,000 employees.



Our supply chains consist of professional consultancy service providers that we collaborate with to assist in our project delivery. We also procure goods and services to support the ongoing operation and maintenance of our studios both globally and locally. In FY 2022, we engaged with over 2,100 suppliers of goods and services across several sectors, amounting to a global spend of over AUD38 million for corporate suppliers and AUD45 million for Project Consultants. The chart below provides a sector break down of our corporate supply chain spend (excluding project consultants).



\*Excludes professional sub-consultancy providers

### 03 Modern Slavery Risks

In FY21 Woods Bagot conducted a comprehensive risk assessment to gain a fuller picture of its modern slavery risks and the mitigation measures that will enable it to manage those risks. The services of an external expert consultant were obtained to assist with this risk assessment. In FY22, the findings of the FY 21 risk assessment were reviewed and it has been determined that the modern slavery risk profile of Woods Bagot remains unchanged.

Woods Bagot continues to assess its modern slavery risks utilising the United Nation's Guiding Principles of scale (gravity of impact), scope (number of individuals affected) and irremediability (can impacts be restored back to prior state). The risk assessment also referenced a number of modern slavery risk indices, for example the Walk Free Foundation [\*Global Slavery Index\*](#).

In FY21 a comprehensive review was also completed of Woods Bagot's policy and contractual framework, along with an analysis of the supply chain on both a project and corporate level, to determine the adequacy of Wood Bagot's current modern slavery risk mitigation practices.

**Operational risks**

Based on the findings of the modern slavery risk assessment and taking into consideration the nature of the industry we work within, Woods Bagot considers the risk of modern slavery in our direct business operations to be low. Woods Bagot has a robust system of Human Resources policies and procedures that support compliance with legally mandated employment entitlements and awards across our workforce. The policies apply to all Woods Bagot operations globally.

**Supply Chain risks**

The modern slavery risk assessment, completed in FY21 and updated in FY22, found that Woods Bagot may have exposure to modern slavery supply chain risks in three areas:

**1. Third party supplier recommendations:** As part of its service offering, Woods Bagot makes third party supplier recommendations to clients, particularly in areas of Architecture and Interior Design. Recommendations sit on a spectrum ranging from recommending general product or material types, to a specific brand of product, or even a specific supplier.

Supplier recommendations can relate to specific materials (e.g. bricks, stone, claddings), fixtures or furniture. Some of these goods are likely to be produced in countries or within sectors that carry a high modern slavery risk.

**2. Corporate procurement:** An analysis of the Woods Bagot procurement spend shows that it includes goods and services from some sectors which are considered at risk of Modern Slavery by the Global Slavery Index, including computers, electronics and mobile phones, branded merchandise (e.g. apparel), office furniture, accommodation, catering, and cleaning.

**3. Sub-contracting:** Woods Bagot utilises a number of sub consultants to provide services in support of Woods Bagot's key service offering. While Woods Bagot does not directly engage sub consultants in any sectors known for a high risk of worker exploitation, the modern slavery risk may increase should a sub-consultant in turn sub-contract to an unknown third-party service provider, particularly to a low cost provider in a high modern slavery risk country.

**04 Risk Mitigation Actions**

Woods Bagot is committed to maintaining best practice in this important area. A Modern Slavery Action Plan focusing on six key areas was developed in FY21 and endorsed by the Audit and Risk Committee. This Action Plan continues to guide the direction, resource allocation and progress in risk mitigation at Woods Bagot:

Item	Action	FY22 Progress Update
Policy and contractual framework	Adopt a supplier code of conduct (applicable to suppliers and sub-consultants), update policies and standard contract terms to include stronger language to affirm Woods Bagot's commitment to prohibit modern slavery and to mitigate modern slavery risks within Woods Bagot operations and supply chains	The Supplier Code of Conduct was drafted with internal stakeholder consultation and is scheduled for release in the second quarter of FY23

Item	Action	FY22 Progress Update
Risk assessment and supply chain mapping	Implement processes to gain a deeper understanding of the Woods Bagot supply chains, including country locations for all suppliers and subconsultants, sector categories for sub-consultants, and information on third party suppliers recommended to clients	Supply chain analysis completed on corporate suppliers which has informed the implementation scheduled for the above-mentioned Supplier Code of Conduct
Due diligence on suppliers	Update procedures to incorporate a specific reference to consider modern slavery risk mitigation during consultant and supplier selection and the inclusion of modern slavery risk as a mandatory criterion in the selection process	This process is now incorporated in the draft Supplier Code of Conduct
Training and capability building for all employees	Incorporate modern slavery content into Woods Bagot employee induction training, and maintain regular training to all personnel on modern slavery requirements and themes	Targeted awareness has been completed through the induction process and other workshops and consultation, however there will be a general training and awareness program once the Supplier Code of Conduct is finalised
Grievance mechanisms and remediation	Extend grievance and remediation processes expressly to include modern slavery concerns, including publicising in the supplier code of conduct	This is a key element of the draft Supplier Code of Conduct
Monitoring, review and reporting	Conduct an annual review, in line with Australia's modern slavery reporting obligations, of Woods Bagot's modern slavery policies and processes to examine their effectiveness, and implement regular modern slavery working group meetings	Regular reporting is occurring. Refer to Section 05, Assessing Effectiveness

In addition to this Action Plan, there are a broader range of continuing actions that are embedded within our standard processes and support our progress. These include, but are not limited to:

- Ensuring that all employees have a written contract of employment that enshrines our employees' rights and entitlements at law
- Developing and implementing policies for safe and respectful work environments which promote health and wellbeing. These policies are annually reviewed to ensure internal relevance and compliance with regulations
- Annual compliance training for all employees that includes health and wellbeing and respect in the workplace

- Identifying and working with companies that are known to us and that have standards that are aligned with our own
- Due diligence completed on new companies that we are looking to work with, to ensure they align with our standards and approach
- Ensuring that relevant contracts include clauses relating to health and wellbeing and modern slavery.

We continue to develop systems, controls, and training so that the due diligence in respect of those we do business with is embedded in our processes to ensure modern slavery risk within our supply chains is minimised if not avoided altogether.

## 05 Assessing Effectiveness

Responsibility for assessing and addressing modern slavery risks occurs under the oversight of the Audit and Risk Committee, a sub-committee of the Board of Directors, with operational oversight by the Global Leader - Risk.

The modern slavery risk assessment (see section 3 above) assessed the adequacy of Woods Bagot's approach to modern slavery risk management against best practices in Australia and internationally. The identified gaps in our risk management approach are being addressed through the recommended Modern Slavery Action Plan (see above). This year's statement includes an update on the progress made during FY22 against our Modern Slavery Action Plan.

Woods Bagot's modern slavery risk management approach is reviewed biannually by the Audit and Risk Committee, with monthly progress reporting to the operational steering group. The progress made is externally reported in each year's Statement and will inform future actions to continually improve our response to modern slavery.

## 06 Consultation with Entities Owned or Controlled

Woods Bagot consulted with the relevant companies it owns or controls in the development of this Statement. This included consultation with Woods Bagot regional operations, purchasing, risk and compliance personnel to develop an accurate statement of Modern Slavery risks and actions to address those risks. In addition, the policies related to Modern Slavery and mitigation measures referenced in this Statement have been socialised across Woods Bagot to ensure the effective implementation of our approach to Modern Slavery risk management. A Modern Slavery risk working group, consisting of risk, legal and practice management, has worked together and with the broader business to ensure relevance and applicability.

This Statement was approved by the Board of Woods Bagot Holdings Pty Ltd on 13 December 2022.



21 December 2022

Nik Karalis  
Chief Executive Officer

07 Modern Slavery Act 2018 (CTH) – Statement Annexure

Mandatory reporting criteria required by <i>Modern Slavery Act 2018</i>	Woods Bagot Modern Slavery Statement
Identify the reporting entity	Section 1
Describe the reporting entity's structure, operations and supply chains	Section 2
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Section 3
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Section 4
Describe how the reporting entity assesses the effectiveness of these actions	Section 5
Describe the process of consultation with any entities the reporting entity owns or controls	Section 6
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	N/A