

2024

Modern Slavery Statement

Strengthening Our Supply Chain to Build a Better Future, Together.



“ Our purpose is to work responsibly, in partnership, to enhance peoples’ lives and environments. This commitment is to our people, our clients, our communities and the environments we operate in. ”

This is Knight Frank Australia's (Knight Frank) Modern Slavery Statement for the financial year 1 July 2023 to 30 June 2024, published in accordance with section 14 of the *Commonwealth Modern Slavery Act 2018* (the Act).

This Statement sets out the measures Knight Frank's Reporting Entities have taken during the financial year ending 30 June 2024 to identify, manage and mitigate the risk of modern slavery practices in our Australian business operations and supply chain, and maintain a responsible and transparent supply chain.

References to “Knight Frank”, “us”, “we” or “our” in this Statement are references to the Reporting Entities (as defined in section 1) unless specified otherwise.

This Statement was approved on 16 December 2024 by the Knight Frank Australia Holdings Pty Ltd Board in its capacity as the principal governing body on behalf of the Reporting Entities (as defined in section 1).

This Statement forms part of Knight Frank's overall corporate governance framework and has been signed by James Patterson, Chief Executive Officer Australia, on behalf of the Board.

James Patterson
Partner, CEO Knight Frank Australia





'Wooke kire-bang-al Yirramboi – Change Tomorrow'
Artwork by Simone Thomson

Knight Frank Australia acknowledges the Traditional Owners of the land where we work and live.
We pay our respects to Elders past and present.
We celebrate the stories, culture and traditions of Aboriginal and Torres Strait Islander Elders
of all communities who also work and live on this land.

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1. Reporting Entities, Structure, Operations & Supply Chain.

Structure

Knight Frank in Australia is wholly owned by Knight Frank Australia Holdings Pty Ltd (ABN 28 114 923 938) and part of the global Knight Frank Group headquartered in London. The global Knight Frank Group has more than 740 offices across 50 territories and employs more than 27,000 people.

Knight Frank Australia Holdings Pty Ltd is 100% owned by Knight Frank Australia Investments Limited, which is owned by Knight Frank LLP. The following trading entities are local subsidiaries of Knight Frank Australia Holdings Pty Ltd:

- Knight Frank Australia Pty Ltd ABN 17 004 973 684
- Knight Frank Occupier Services Pty Ltd ABN 34 116 268 565
- Knight Frank NSW Valuation and Advisory Pty Ltd ABN 48 631 678 503
- Knight Frank Licensing Pty Ltd ABN 11 103 147 191

Together these 'trading entities' trade under the name 'Knight Frank'.

In addition to these trading entities, Knight Frank Australia Holdings Pty Ltd has 24 Australian non-trading subsidiaries and one trading subsidiary incorporated in New Zealand.



For the purposes of the Act, only Knight Frank Australia Holdings Pty Ltd and Knight Frank Australia Pty Ltd meet the threshold requiring an annual Modern Slavery Statement (the Reporting Entities).

Knight Frank's registered office is located at Level 29, 120 Collins Street, Melbourne Victoria 3000.

No entity or practice operating under the name Knight Frank is liable for the acts or omissions of any other entity or practice operating under the name Knight Frank. Neither does it act as agent for nor have any authority (whether actual, apparent, implied, or otherwise) to represent, bind or obligate in any way any other entity or practice that operates under the name Knight Frank.

Knight Frank does not currently have any involvement in joint venture business relationships which are required to be reported.

1.

Reporting Entities, Structure, Operations & Supply Chain.



Operations

In Australia, Knight Frank has 12 corporate offices and approximately 890 employees servicing capital cities and regional centers across the country.

To pursue its business objectives and strategy, Knight Frank offers a broad range of property services across all asset classes, including property management, project management, building consultancy, sustainability consultancy, valuations, leasing, sales and acquisitions, transaction management, occupier advisory and strategic property consultancy.

Knight Frank's operations are fully located within Australia (except for managing a franchise agreement for real estate agency services in New Zealand) and all services are performed within Australia.

All employees and casual workers are provided with written employment agreements, undergo police background checks and provide evidence of the right to work within Australia prior to commencing work in the business.

1. Reporting Entities, Structure, Operations & Supply Chain.



Supply Chain

As a modern real estate entity, Knight Frank's supply chain includes both direct and indirect suppliers of goods and services.

Direct Suppliers

Knight Frank's direct supply chain consists of an approximately **700** suppliers and contractors providing a range of services and products directly to Knight Frank, including technology hardware and software, office consumables, travel services, recruitment, marketing services and collateral, insurance and catering. These products and services are not sold to customers but are required for the day-to-day operations of the business.

These direct suppliers are located within Australia except for some insurance providers who are in England. Arrangements with these suppliers can be either short-term and flexible or stable longer-term relationships dependent upon the service procured.

Indirect Suppliers

Knight Frank's indirect supply chain arises through contractual and agency appointments for property and/or facilities management and project management services, which may include the facilitation, procurement and management of services on behalf of its clients in accordance with individual client contracts. This indirect supply chain consists of approximately **2,500** suppliers and contractors providing a range of services including, mechanical and electrical engineering, hygiene and cleaning services, pest control, janitorial, security, plumbing, landscape, fire services, plumbing, water treatment, waste removal, concierge and professional consultancy services.

Knight Frank proactively engages with its indirect suppliers to ensure that people working within these organisations are protected from modern slavery practices. Knight Frank works in partnership with its clients to influence the indirect supply chain through the selection and management of contractors. Knight Frank believes in developing a collaborative and long-term approach to supplier relationships on behalf of its clients. Final procurement decisions of indirect suppliers rest with Knight Frank's clients.

2.

Identifying Risks of Modern Slavery.

Knight Frank recognises the importance of respecting human rights, which is an integral part of our Corporate Social Responsibility commitment. As a business, we're continually implementing steps to strengthen our due diligence processes to mitigate the risk of modern slavery by undertaking audits on our supply chain and when required, remediation processes, that enable us to identify, prevent and mitigate modern slavery risks within our own business, as well as with our suppliers.

Modern slavery includes eight types of serious exploitation. Based on understanding these types of exploitation and our business operations, we've identified the following four salient modern slavery risks to our supply chain:

1. **Deceptive recruitment of labour:** workers promised certain jobs, benefits or conditions which do not eventuate
2. **Forced labour:** restrictions of movement, intimidation and threats
3. **Trafficking in persons:** recruitment, harbouring and movement of a person for exploitation
4. **Debt bondage:** the payment of excessive recruitment fees and retention of identity documents

Direct Suppliers

The risk factors associated with Knight Frank's own operations are relatively low as:

- Staff are directly employed under the requirements of Federal and State employment law
- Procurement commissions or incentives that may drive increases in modern slavery risks are not used in the procurement process
- Knight Frank has not identified any occurrences to date of modern slavery within its operations or supply chains

Knight Frank partners with the Property Council of Australia using its Informed 365 platform to assess direct suppliers as part of the onboarding process.

Indirect Suppliers

During 2024, Knight Frank focused on building upon the successes achieved through the transition to its Cm3 contractor management platform. The enhanced screening and due diligence process have fostered greater engagement and collaboration with indirect suppliers. This year, special attention has been given to deepening supplier awareness of modern slavery risks, with targeted outreach and support aimed at ensuring increased supplier response.

By leveraging the Cm3 platform and aligning engagement strategies with industry best practices, the company has strengthened its ability to monitor, address, and reduce modern slavery risks across its operations. Knight Frank remains committed to advancing these efforts, continuing to raise awareness and improving the overall effectiveness of its modern slavery compliance program in 2024 and beyond.

3.

Risk-based Approach to Management.

Approach to Risk Mitigation

Our Anti-Slavery Policy minimises the risk of modern slavery in our business, operations and supply chain. Our Supplier Code of Conduct further strengthens our commitment to modern slavery risks, ensuring our suppliers and subcontractors meet the same stringent standards as our business.

Knight Frank is required to report annually on modern slavery within its supply chain to set out the steps we've taken within each 12-month reporting period to assess and address the risks of modern slavery in our operations and supply chain.

Corporate Governance

Knight Frank has developed and implemented a corporate governance structure within the framework of its day-to-day operations driven by a modern slavery compliance program and overseen by the Knight Frank Board, who has ultimate oversight and responsibility for compliance with modern slavery regulations.

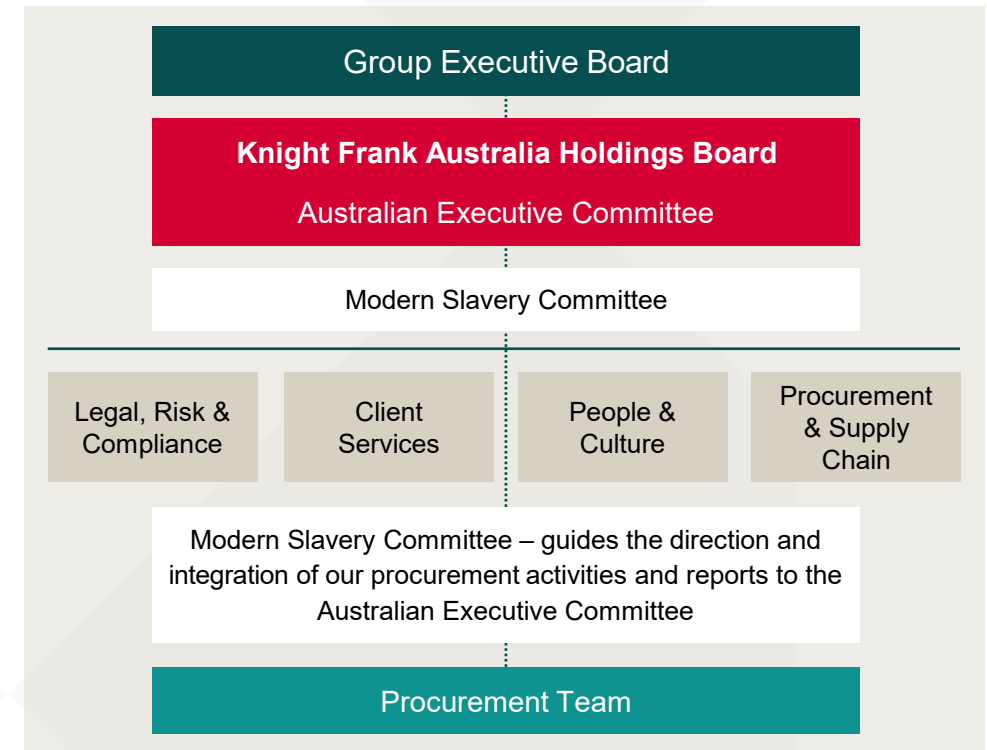
Our approach to corporate governance also includes a Modern Slavery Committee who meet regularly to review action items, monitor progress and ensure conformance with its Anti-Slavery Policy and Modern Slavery Compliance Program.

Further, Knight Frank's Legal, Risk & Compliance team coordinate and utilise the expertise of various subject matter experts within the various service lines and departments to carry out regular modern slavery risk assessments and due diligence.

Policies

The Modern Slavery Statement and policy sits within the suite of Knight Frank Corporate Governance policies, which includes the following:

- ESG Policy Statement
- Anti-Slavery Policy
- Whistleblowing Policy
- Anti-Bribery & Corruption Policy
- Anti-Money Laundering Policy
- Sanctions Policy
- Modern Slavery Remediation Plan



3.

Risk-based Approach to Management.



Risk assessment

Knight Frank currently subscribes to the following third-party platforms to assist us with the risk assessment process:

Informed 365 - for direct corporate suppliers

Cm3 – for indirect suppliers

Every indirect supplier is required to complete an ethical sourcing investigation in accordance with the Anti-Slavery Policy prior to the engagement with the supplier.



Due diligence review

Where suppliers are identified as a higher risk, a due diligence review of the information provided is undertaken to understand the mitigation measures have been implemented.

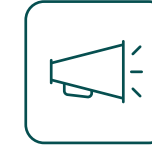
Where an indirect supplier has been identified as higher risk and there are inadequate risk mitigation measures in place, Knight Frank's client is informed of the nature of the risk and a client direction is obtained prior to the continued engagement of the contractor.



Improvement plan

Knight Frank's areas of focus for improvement include:

- Prioritise focus on indirect contractors with greater client spend and targeting at-risk industry sectors such as cleaning and security suppliers
- Require contractors to confirm adherence to the Supplier Code of Conduct, including processes for capturing data and reporting
- Continued enhancement to the Supplier Code of Conduct



Call out culture

A key part of Knight Frank's remediation plan is to encourage a culture whereby people feel comfortable to report potential occurrences of modern slavery within Knight Frank's operations and supply chain. Reporting of modern slavery concerns forms part of the Whistleblower Policy, which is supported by the independent and anonymous whistleblowing hotline.

Details of how to call out instances of modern slavery are communicated to workers who attend properties under Knight Frank management through the contractor induction module.

4.

Approach to Remediation.

- In line with the UN Guiding Principles, Knight Frank must respond to situations where it has caused or contributed to the adverse impacts of modern slavery. A comprehensive remediation plan has been developed which provides a clear framework governing how to respond and cooperate in the remediation of such an impact.
- Initiation of the remediation process is commenced when the Legal, Risk & Compliance team is notified of an occurrence of modern slavery. The remediation process and supporting information is described in the remediation plan, which ensures victims are supported, and improvement actions are undertaken to prevent future occurrence.
- Knight Frank's remediation plan has been communicated to all employees via the Knight Frank intranet, induction processes for new employees and forms part of its mandatory modern slavery training program.
- Throughout each stage of the remediation process, the Legal, Risk & Compliance team must liaise directly with the Executive Committee and the Board to ensure that the most beneficial outcome to all parties is achieved.
- Knight Frank has had no occurrence or incident during this reporting period which required the implementation of the remediation plan.



5.

Assessing Effectiveness of Our Actions.

Knight Frank has established several mechanisms to assess the effectiveness of its modern slavery compliance program. This includes the use of performance measures, incident reporting and investigation.

Knight Frank use several quantitative key performance indicators to measure the effectiveness of the modern slavery mitigation processes governing its operations and supply chain. These performance indicators cover three categories, including education, engagement and incident reporting.



1. Education:

- Contractor employees undertake induction training incorporating modern slavery.
- Mandatory onboarding training for all new Knight Frank employees – 186 new employees were trained to 30 June 2024, and refresher training was rolled out to all existing employees.



2. Engagement:

- Tracking indirect supplier compliance with Cm3 screening questions prior to onboarding – all indirect suppliers have complied with the supplier screening process prior to onboarding.
- Additionally, Knight Frank has prioritised the assessment of suppliers identified as potentially high-risk. By leveraging the Cm3 platform and aligning engagement strategies with industry best practices, the company has strengthened its ability to monitor, address, and reduce modern slavery risks across its operations.



3. Incidents Reporting

- At risk suppliers and vulnerable workforce statistics remained steady to June 2024.
- No incidents were reported in this period.

186

New employees trained

100%

Indirect supplier Cm3 engagement level

100%

Existing employees received refresher training

18%

At risk indirect services & products

* Statistics for FY 2023/24



6.

Consultation & Other Relevant Information.

Our progress and future commitments



During the 2023/24 financial year, Knight Frank:



Reviewed modern slavery compliance within our preferred recruitment agencies (direct suppliers)



Enhanced our education program for employees, direct and indirect suppliers



Provided education to our Procurement team and key business stakeholders on labour hire licence requirements



Continued to explore new technologies and risk-based systems to enhance our compliance



Looking ahead to the 2024/25 financial year, Knight Frank is committed to:



Further evaluating our systems



Reviewing and enhancing our indirect supplier compliance processes



Conducting a review of our direct supplier procurement processes, including the Supplier Code

This statement applies to Knight Frank and its Trading Entities. It does not apply to any Knight Frank franchisees, which are all separate legal entities over which Knight Frank does not exercise any direct control.

All the Trading Entities of Knight Frank are wholly owned. Consultation and cooperation between these entities is guaranteed due to all entities sharing the same shared services operations and following the same policies and processes.

This statement was made available to the Board of Knight Frank Australia Holdings Pty Ltd for review and comment prior to obtaining approval.

Knight Frank is committed to the ongoing engagement and consultation with all clients, stakeholders, and suppliers to continue to address the risks of modern slavery within its operations and supply chains.

No other information is considered relevant



