

The logo for URBIS, consisting of the word "URBIS" in a bold, black, sans-serif font, enclosed within a black rectangular border that is slightly offset to the right and top.

URBIS

MODERN SLAVERY STATEMENT

1 JULY 2019 – 30 JUNE 2020




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A woman with long brown hair, wearing a blue denim shirt, is seated at a table and speaking to a group of people. She is holding a pink pen and gesturing with her hands. In the background, two men are listening attentively. The setting appears to be a bright, modern meeting room with large windows.

The **Modern Slavery Act 2018** defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.*

*Refer to www.legislation.gov.au/Details/C2018A00153

01 OUR COMMITMENT

Urbis is an organisation dedicated to shaping cities and communities for a better future.

We work to create places and spaces to improve the lives of the people who use them.

We take our role as an ethical and responsible business seriously, and our commitment to combatting modern slavery risks is fully supported from the highest level of our organisation. As such, we are proud to release our inaugural Modern Slavery Statement.

This Statement was developed with the expertise of an external specialist who cross-referenced our suppliers with a database of known risks from the United Nations and more.

Independent assessment determined our current risk of contributing to modern slavery was low. Our ongoing efforts to understand and address modern slavery include:

- a. Updating relevant supplier contracts to include provisions addressing modern slavery
- b. Adopting a Supplier Code of Conduct
- c. Conducting a modern slavery self-assessment questionnaire among our suppliers
- d. Providing modern slavery training for specialised groups within the organisation

As our first report into modern slavery we know there is more work to be done. We commit to regularly assessing and identifying any risk that modern slavery has played a part in our supply chain.

We view all our actions to eradicate modern slavery as consistent and complementary to the Urbis Code of Conduct, extending the role we all must play in improving the world we live in.

We will continue to uphold the right of every human being to be valued, respected and supported.



Benjamin Pollack
Chief Executive Officer










Tim Blythe
Managing Partner

This statement was approved by the Board of **Urbis Pty Ltd** on the 8 March, 2021.

02 COMPANY PROFILE

WHO WE ARE AND WHAT WE DO SHAPING CITIES FOR A BETTER FUTURE


Urbis works to shape cities and communities for a better future. We provide a wide range of professional services and advice, including in the areas of:

-  urban planning and design
-  retail and property economics
-  property valuations
-  property management
-  social planning and public policy
-  landscape design
-  heritage & archaeology

We pride ourselves on our ability to provide fresh thinking and evidence-based solutions. The values of authenticity, collaboration, decisiveness and spiritedness are the driving force behind all that we do in the Australian community.


This statement relates to the operations of **Urbis Pty Ltd**, as the reporting entity, and Urbis' consolidated group of entities. Details of all the entities making up the group can be found at Appendix 1.

 Singapore

 Perth

 Brisbane
Gold Coast

 Parramatta

 Sydney

 Geelong
Melbourne

OUR STRUCTURE AND OPERATIONS

Our day-to-day operations stand well apart from those commercial activities that comprise the most widely recognised risk areas for modern slavery. However, we understand that no global business operates entirely outside of such risks.

Urbis Pty Ltd is an Australian-based proprietary company. We have offices located in the Australian cities of Brisbane, Gold Coast, Sydney, Parramatta, Melbourne, Geelong, and Perth. We also have an office in Singapore.

We employ more than 500 people across our domestic and international offices.

Our primary business activity is as professional advisors to the property sector both in Australia and internationally. We have a diverse range of stakeholders and clients from that sector including property developers, owners and investors, private and public companies, NGO's, community groups, industry associations and all levels of government.

Our professional services include the following areas:

- design and master plan urban developments
- guiding development projects through the complex process for gaining planning approval
- assisting our clients in imagining and building places of work, leisure, entertainment and commerce such as shopping malls, business parks and retirement living

- providing property market and economic analysis
- researching and analysing market forces and shopping trends
- consulting and engaging with communities
- evaluating urban policy and advising on strategic visions
- providing heritage advice
- valuing properties, advising on property transactions and associated property investment management.

In addition, we also advise all levels of government on implementing and reviewing a broad range of government social and economic programs and initiatives - many of which are unrelated to the property sector.

In 2016, we launched a new business under the trading name Cistri. Through Cistri, we have expanded our professional services to markets across Asia and the gulf region in the Middle East. This international business is conducted through the Cistri Group of Companies which operate an office in Singapore.

Urbis provides professional services across a diverse range of industry sectors, including:



Commercial



Education



Energy &
Renewables



Government



Health &
Aged care



Industrial



Infrastructure



Mixed use



Residential



Retail



Telecommunications



Tourism &
Leisure

OUR SUPPLY CHAINS

Urbis has contracts with over 900 direct suppliers across a broad variety of sectors and industries. A significant proportion of these suppliers are Australian-based entities. They range from large multinationals with a presence in Australia (for example, engineering or architecture firms) to smaller Australian-based entities and individuals, such as sole practitioners.

We also have suppliers in Singapore and Hong Kong that are responsible for providing goods and services to our Cistri international business. A third, even smaller share of direct suppliers, are located overseas, including Great Britain, the United States, Malaysia, India and China.

We recognise that the location of a supplier's operations can influence the modern slavery risk, and acknowledge the different risks associated with our operations in Singapore.

A large proportion of the goods and services we receive from our direct suppliers are of a kind that directly relates to the professional services Urbis provides to our clients. Independent professional service providers are often engaged on a contractual basis to provide specialist advice for specific client engagements.

Urbis engaged external subject matter experts to help us to comprehensively map our supply chains for the specific purpose of modern slavery risk assessment.



**OVER 40 MILLION
PEOPLE CAUGHT IN
MODERN SLAVERY*
– UNITED NATIONS**

*Refer to <https://news.un.org/en/story/2017/09/565202-over-40-million-people-caught-modern-slavery-152-million-child-labour-un>

03 RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

As a property consultancy firm, our day-to-day operations and direct supply chains are relatively detached from the most prevalent risks of modern slavery in the property sector.

Our principal supply chains are overwhelmingly in the professional services industry category, including:



legal services



market research



real estate



other business management services



advertising and related services



property operator and developer services



company and enterprise management services



business services

Based on our risk assessment during the reporting period, we consider our risk of contributing to modern slavery is low. In addition, we did not identify any actual or suspected cases of modern slavery in our operations or supply chains.

While we are not directly involved in activities such as the building construction, corporate cleaning and maintenance of office (and other commercial) buildings, and the manufacture of building materials and textiles used in property developments, we recognise that these are all sectors with known modern slavery risks.

ELEVATED INDUSTRY RISK CATEGORIES IN OUR SUPPLY CHAIN

Urbis' modern slavery risk is elevated by the following three industry categories, since a significant proportion of our spend is with 150 suppliers within these areas.



Dwelling Ownership



Business Services



Market Research and Other Business Management Services

The above supply chain industry categories are explained in further detail at Appendix 2.

The modern slavery risks for these industry categories is well removed from the direct operations of our suppliers.

Regardless, due to our relatively larger spends in the three industry categories discussed above, we seek to leverage our relative bargaining power. We will work collaboratively with the suppliers in these industry categories to assess their own due diligence efforts within their own supply chains.



04 ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

We have, working together with external subject matter experts, undertaken a detailed modern slavery risk assessment in relation to our supply chains and operations. We are using these results to inform our response and actions in addressing modern slavery risks beyond the current reporting period.

We have comprehensively mapped our supply chains (comprising over 900 suppliers) using cutting-edge technology and analysis, as summarised in Appendix 3.

As part of our internal governance due diligence, we have undertaken a policy and document review to identify potential areas to incorporate specific provisions addressing modern slavery risks.

Our standard subconsultant engagement agreement contains specific provisions addressing modern slavery risks. This allows Urbis to meet its requirements under the Act when engaging specialist third party consultants on client projects.

The updated Sub-consultant agreement is used for engaging all third-party consultants for client advisory work and projects. The modern slavery update was first introduced during the second half of 2020 (outside the reporting period).

At the time of lodgement of this Statement, Urbis was in the process of undertaking a detailed modern slavery risk survey of its 50 suppliers identified with the highest elevated relative risk of modern slavery risk in their own supply chains.

We intend to report on the results of this Survey, and further action taken in response to the due diligence findings and remediation activities arising from it, in the subsequent reporting period under the Act.



**WE HAVE COMPREHENSIVELY
MAPPED OUR SUPPLY
CHAINS USING CUSTOM
TECHNOLOGY AND ANALYSIS**

Our current remediation process for modern slavery-related issues incorporates our pre-existing Whistle-blower Protection Policy and Whistle-blower Hotline. These are readily accessible by all Urbis personnel (including employees, contractors and current and past officers and relatives).

The policy contains detailed provisions in relation to the reporting of unacceptable conduct.

Upon investigations into the reported conduct, the Whistle-blower Protection Officer is to recommend to the Chief Executive Officer or Chairperson of Urbis as to the action that should be taken.

SLAVERY IN CORPORATE SUPPLY CHAINS CONFLICTS WITH RUNNING A RESPONSIBLE BUSINESS, ONE THAT IS BASED ON ETHICAL VALUES SUCH AS DIGNITY, JUSTICE, FAIRNESS, EQUALITY, INTEGRITY, RESPECT, AND RESPONSIBILITY.*

**POLLY FOLEY, SENIOR RESEARCHER,
INSTITUTE OF BUSINESS ETHICS**

*Refer to www.reutersevents.com/sustainability/supply-chains/modern-slavery-and-role-business





FOCUS AREAS FOR UPCOMING REPORTING PERIODS

SUPPLIER RELATIONSHIPS AND FUTURE COLLABORATION OPPORTUNITIES

A very significant proportion of our supplier relationships are long standing. These relationships are based on a high degree of established trust and an understanding of the supplier's operations. We recognise that this provides an ideal opportunity for future collaboration in a multi-entity and coordinated response to adopt anti-modern slavery initiatives.

Over the next twelve months, we intend to specifically focus on continuing to improve how we engage with suppliers on issues relating to modern slavery risk. This includes further incorporating the issue of modern slavery risk as an express requirement of our purchasing practices.

SUPPLIER CODE OF CONDUCT

Urbis is looking to develop and implement an organisation-wide, Supplier Code of Conduct that specifically addresses modern slavery issues during 2021. Key aspects of the Code will include:

- a. supplier compliance with internationally recognised standards of social and environmental sustainability
- b. express provisions addressing common modern slavery practices, including child labour, debt bondage, and issues relating to working hours, recruitment practices, and payment of wages and benefits
- c. a grievance procedure and rectification process (in line with our existing, generally operating, Whistleblower Policy and Procedure).

ASSESSING THE EFFECTIVENESS OF SUCH ACTIONS

We will develop a Framework for Measuring Effectiveness for long-term evaluation and to implement a continual improvement mindset.

The framework will provide a high-level overview of our key efforts, along with a means of measuring progress to ensure we are practically addressing modern slavery risks within our business operations and supply chains.

THE PROCESS OF CONSULTATION WITH ANY ENTITY WE OWN OR CONTROL

In preparing this Modern Slavery Statement, we fully consulted with all separate legal entities that comprise wholly owned subsidiaries, or that we otherwise control, as listed in Appendix 1.

Presentations were made and consultation was undertaken with the Group Risk Committee on Modern Slavery compliance obligations.



05

COVID-19 IMPACT AND OTHER RELEVANT INFORMATION

In common with most businesses in Australia, we had to urgently respond and implement otherwise unplanned business initiatives and projects during the second half of the reporting period to manage the impact of COVID-19. This necessarily required that we adjust our planned modern slavery response, harnessing digital technology and enhancing the efficiency and accuracy of our due diligence.

A1 APPENDIX 1 **REPORTING ENTITIES**

This statement relates to the operations of Urbis Pty Ltd (ABN 50 105 256 228), a registered proprietary company, which is the mandatory reporting entity under the Modern Slavery Act 2018 (Cth).

The statement also relates to Urbis' consolidated group of entities (which are not mandatory reporting entities on an individual basis):

- a. Urbis Services Pty Ltd (ABN 24 105 273 505)**
- b. Urbis Valuations Pty Ltd (ABN 28 105 273 523)**
- c. Urbis Investment Management Pty Ltd (ABN 29 631 758 677)**
- d. Urbis Property Services Ltd (ABN 63 007 375 082)**
- e. Cistri Pty Ltd (ABN 96 105 273 498)**
- f. Urbis Keys Young International Pty Ltd (ABN 94 105 273 489)**
- g. Cistri (Group) Pte. Limited and its subsidiaries Cistri Pte Limited and Cistri Limited.**

A2 APPENDIX 2

DIRECT SUPPLIER INDUSTRY CATEGORIES

DWELLING OWNERSHIP

This industry category includes suppliers that provide Urbis with property leasing and other property related services. These include the leasing of office premises from which we conduct our business operations or premises at which we hold internal and client conferences.

The majority of these suppliers are Australian-based entities, apart from those that service our international offices in Singapore and Hong Kong (to the extent the office in that location operated during the subject reporting period).

The suppliers that fall within this industry category have a range of inputs, with products and services at Tier 2 and Tier 3 including:



BUSINESS SERVICES

The Business Services category is one of huge breadth. It represents the highest relative modern slavery risk amongst all the Urbis supplier industry categories. Services and/or products in this industry category include relatively low value consumables such as office and stationary supplies, printing services and maintenance.

The category also covers a range of short-term specialist and professional services such as tax services, engineering and project management that support our client engagements.

The most elevated modern slavery risk within this industry category is generally deep within the supply chain.

MARKET RESEARCH AND OTHER BUSINESS MANAGEMENT SERVICES

This industry category represents the fourth largest category by spend. It covers a range of supporting business services such as IT, education/training, and specialist sub-consultancy services.

The majority of these suppliers are Australian-based entities, made up of highly skilled workers.

Similar to the Business Services category, the elevated relative modern slavery risk for this industry category is well removed from the direct operations of our suppliers.

It is likely that modern slavery risks in this industry sector are located much deeper within the supply chain.

A3 APPENDIX 3 SUPPLY CHAIN MAP

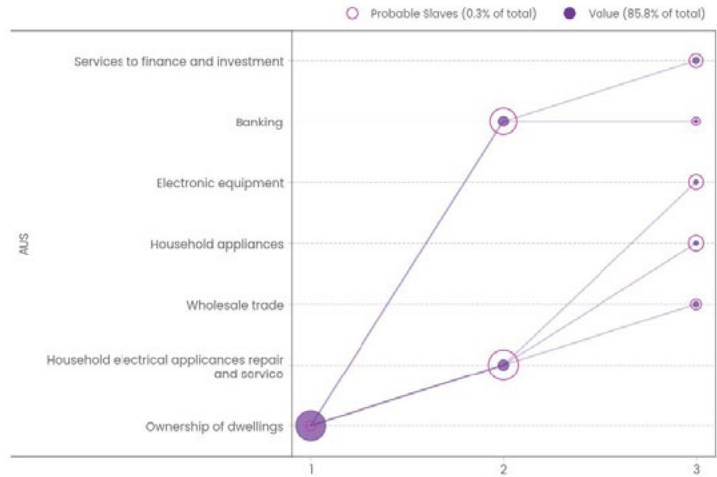
Supply Chain with Slavery Footprint

This plot shows the modern slavery risks occurring in our most frequently used industry category supply chains. The graphs represent only a segment of the complete value chain mapped by an algorithm from which risk values were derived.

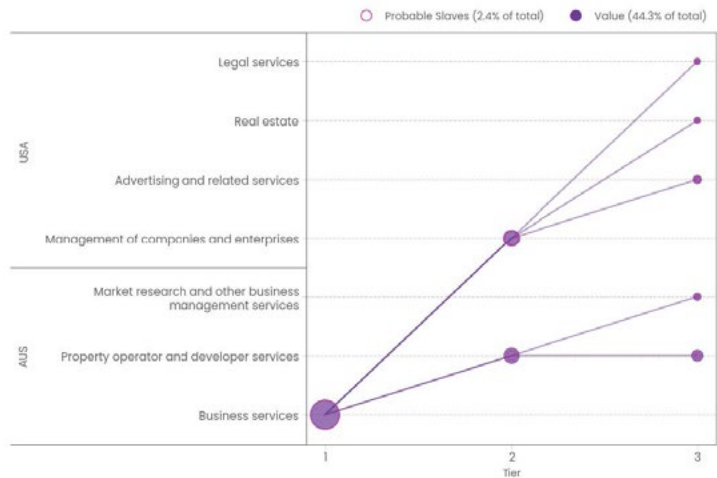
The 'Value and 'Slavery risk' percentages indicate what percentage of the total value chain and slavery risk is represented by the industries and supply chain layers depicted on the plot. For example, in the case of the 'Ownership of Dwellings' category, the suppliers to this industry account for 85.8% of the total spend throughout the value chain of this industry, whereas they account for only 0.3% of the total slavery risk identified.

The size of the hollow circles are proportional to the estimated number of slaves at the given industry and supply chain layer, based on the value shown in the plot.

Urbis Ownership of Dwellings Supply Chain Map



Urbis Business Services Supply Chain Map



Urbis Market Research Supply Chain Map

