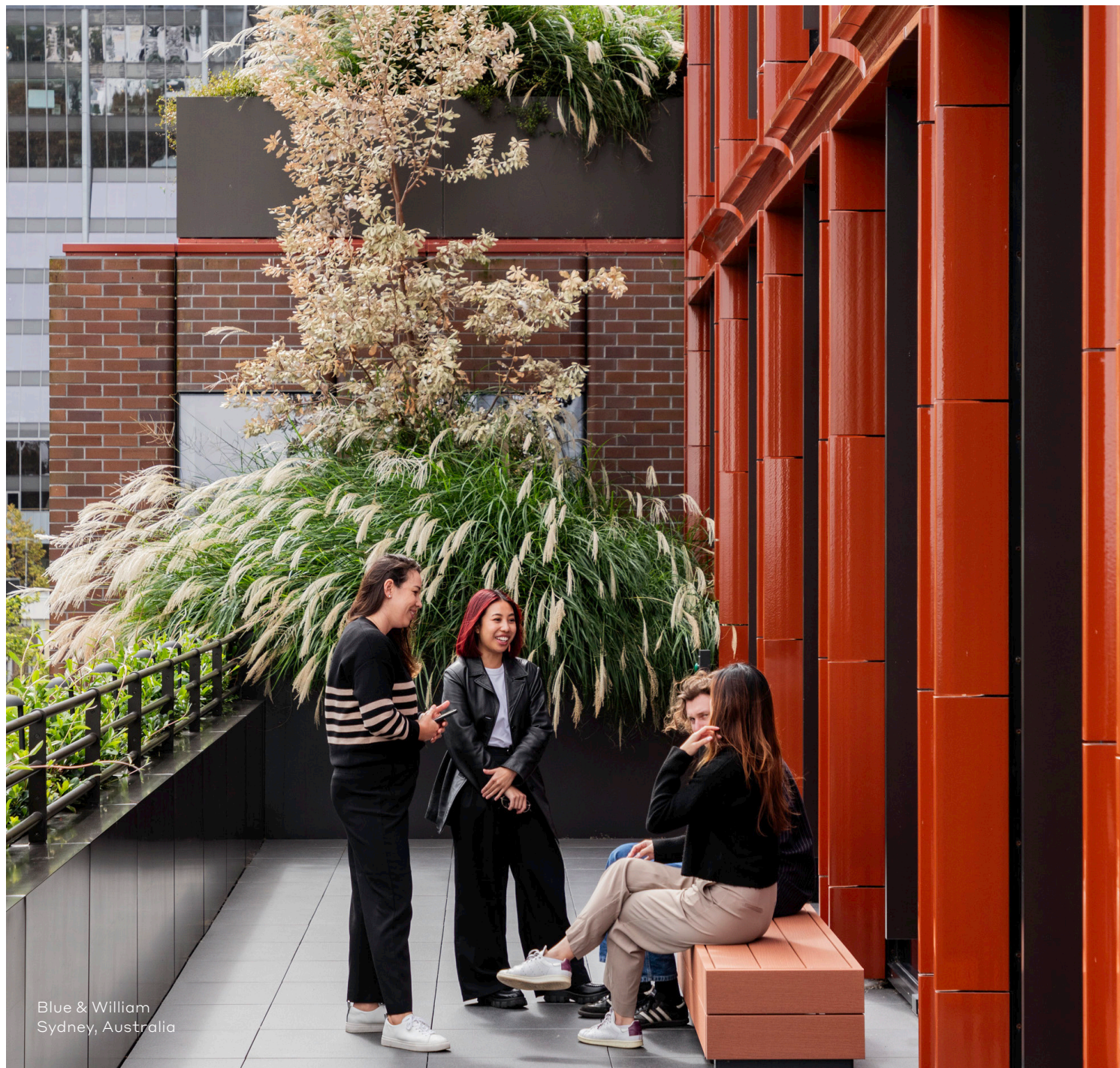




# Modern Slavery

Statement FY2024



Blue & William  
Sydney, Australia





80 Ann, Heritage Lane  
Brisbane, Australia



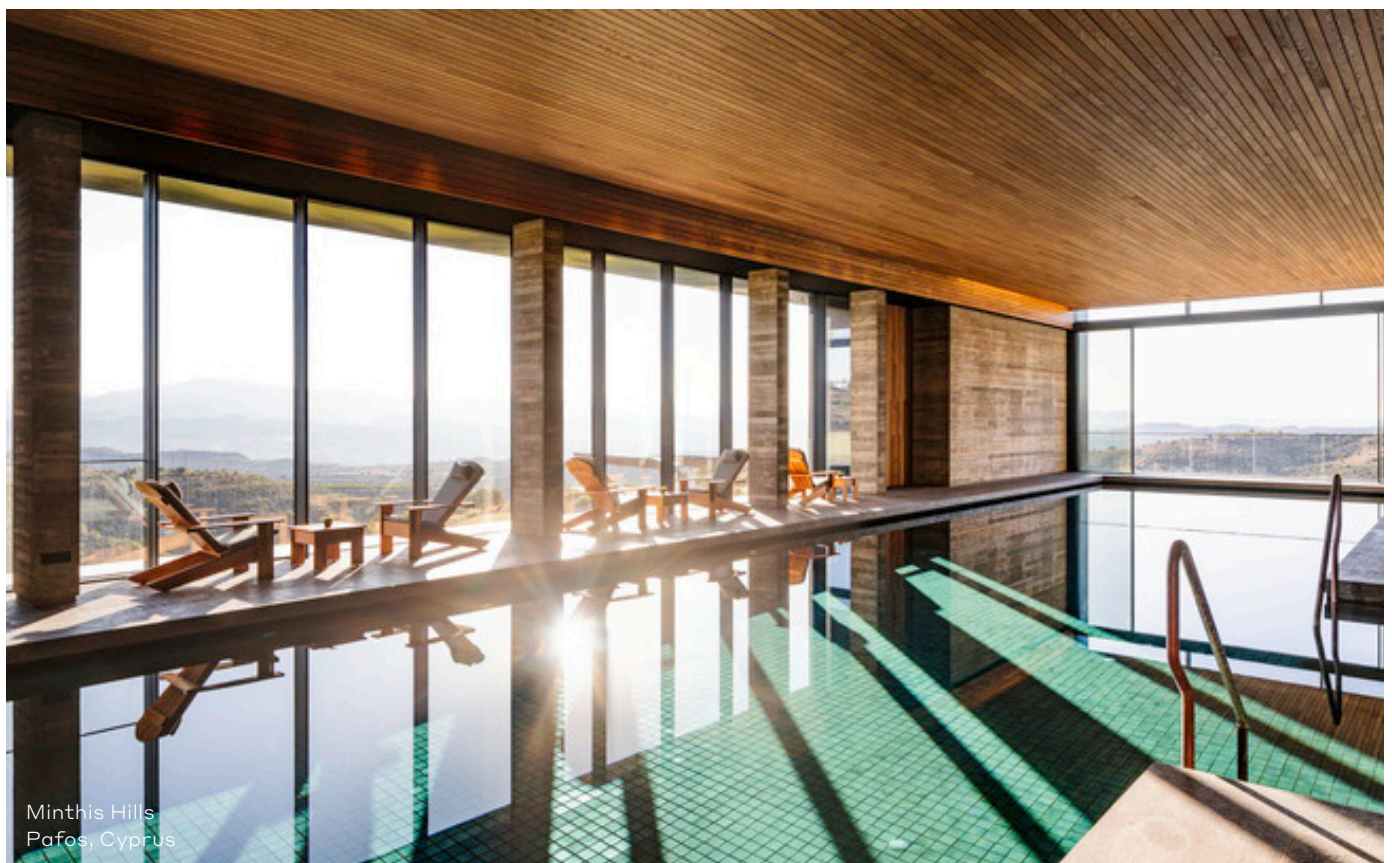
# 01 Introduction

7C Holdings Pty Ltd (formerly Woods Bagot Holdings Pty Ltd) (herein referred to as '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 robust measures to mitigate the risk of modern slavery in any part of our business or supply chain. 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 2024 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, ERA-co, and/or Customs Bureau.

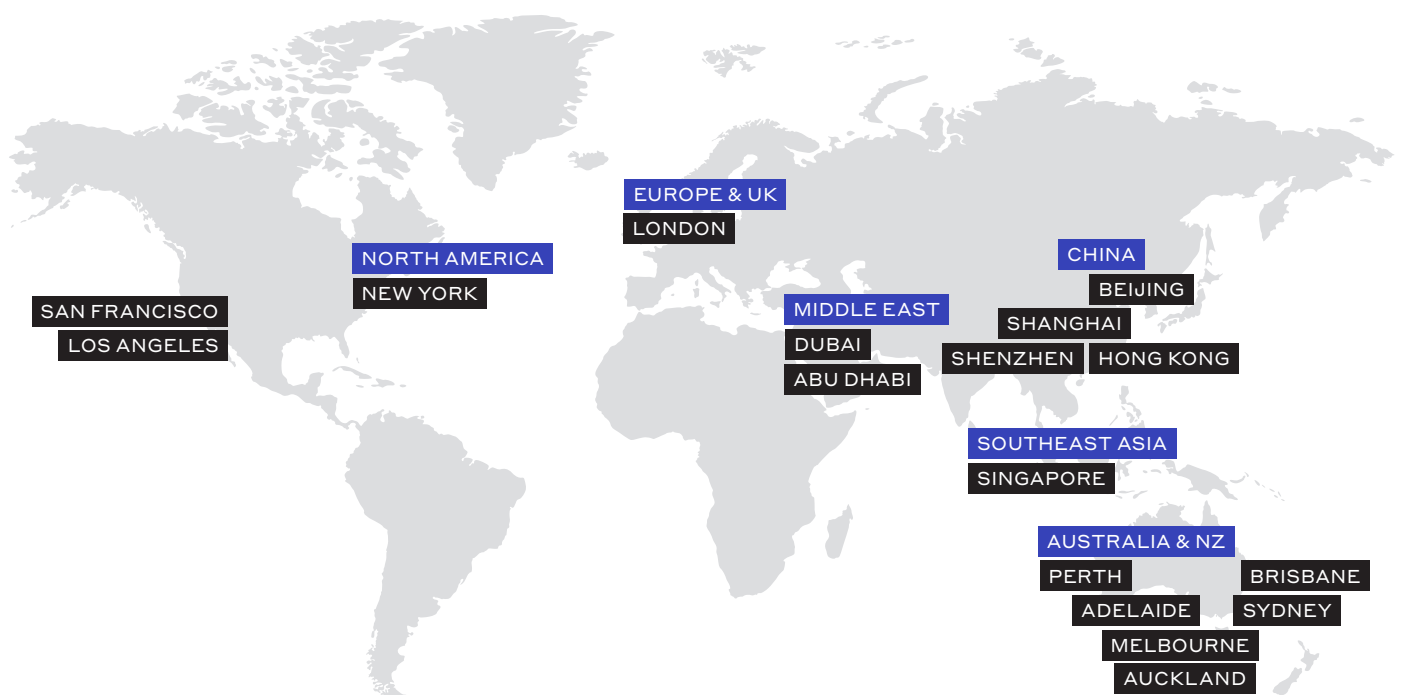


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## 02 Our Structure, Operations & Supply Chains

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 approximately 1,000 employees.



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Regions across  
the globe

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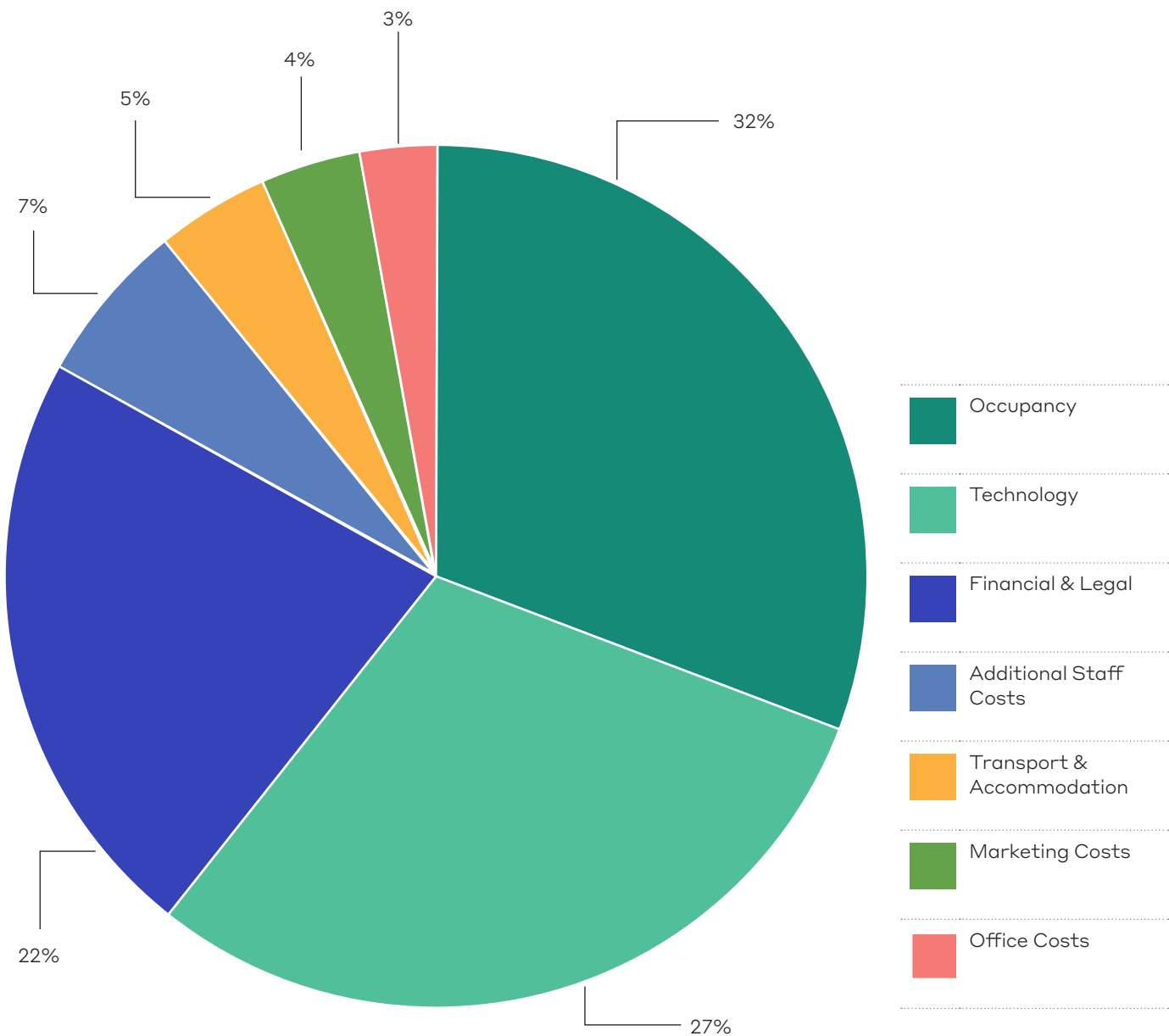
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Cities all oriented  
around the practice  
of People Architecture

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 2024, we engaged with approximately

2,000 suppliers of goods and services across several sectors, amounting to a global spend of over AUD42 million for corporate suppliers and AUD58 million for project consultants. The chart below provides a sector break down of our corporate supply chain spend (that is, excluding project consultants).

**WB Supplier Spend FY2024**  
**(Excluding Projects Costs)**



## 03 Modern Slavery Risks

In FY2021 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 FY2024, that same consultant was utilized to carry out a comprehensive review and update of the risk assessment and to validate progress made since the FY2021 assessment. This review also considered the updated international legislative and regulatory environments.

Woods Bagot also continues to approach its modern slavery risks utilising the United Nation's Guiding Principles on Business and Human Rights 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 several modern slavery risk indices including, for example, the Walk Free Foundation's updated [2023 Global Slavery Index](#).

In FY2024 comprehensive analysis was also completed of Woods Bagot's 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 updated 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. However, our 2024 risk assessment did find there is an increased modern slavery risk as rated by the Global Slavery Index in several countries in which we either deliver projects or have offices, particularly in the Middle East region. Woods Bagot has a robust system of Human Resources policies and procedures that support compliance by legally mandated employment requirements across our workforce. The policies apply to all Woods Bagot operations globally.

### Supply Chain Risks

The modern slavery risk assessment found that Woods Bagot may have exposure to modern slavery supply chain risks in three areas:

#### 1. 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.

#### 2. 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 subconsultants 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 country with high modern slavery risk.

#### 3. 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 nominating general product or material types, to specifying 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.



49 Chambers  
New York, USA



# 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 FY2021 and endorsed by the Audit and Risk Committee. Subject to annual review and updating, this Action Plan continues to guide the direction, resource allocation and progress in risk mitigation at Woods Bagot. The updated progress of this plan for FY2024 is as follows:

Item	Action	FY2024 Progress Update
Policy & 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.	The Supplier Code of Conduct is regularly reviewed for currency and relevance and to reflect any changes that may be applicable to the business. A further internal stakeholder consultation will also be conducted in 2025. The Code can be found on the <a href="#">Woods Bagot website</a> .
Risk Assessment & 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 is completed at each financial year end on corporate suppliers. This analysis informed the implementation of the above-mentioned Supplier Code of Conduct and the due diligence process.
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. Develop a due diligence process for suppliers.	<p>Woods Bagot has implemented a supplier due diligence process for corporate procurement examining key ESG criteria, including modern slavery. The process incorporates an inbuilt risk rating based on country location, sector, and spend. It has already been applied to 75% of corporate procurement spend.</p> <p>Current sub-consultancy agreement templates used by the business have been updated to include clauses requiring compliance with the Supplier Code of Conduct. Additional or revised templates include such clauses as they are developed.</p> <p>The sub-consultant questionnaire templates have been updated to include reference to the Supplier Code of Conduct and extent of operations in high risk countries.</p>
Training & 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.	A compliance training module on Preventing Modern Slavery was rolled out in May 2024. This online training is compulsory for all personnel and will form part of the annual compliance training program. The updated induction process, released in April 2023, also includes reference to relevant policies.
Grievance Mechanisms & Remediation	Extend grievance and remediation processes expressly to include modern slavery concerns, including publicising in the supplier code of conduct.	Reporting Violations is a key element of the Supplier Code of Conduct. This is supported by the well established Whistleblower reporting mechanism.
Monitoring, Review & Reporting	<p>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.</p> <p>In addition, the comprehensive review and update of the risk assessment was scheduled and completed in FY2024.</p>	<p>Regular reporting is occurring. Refer to Section 05, Assessing Effectiveness.</p> <p>The methodology for the updated risk assessment included preparatory meetings with the working group, surveying a sample of employees, document review, a validation workshop, and provision of draft and final reports. The findings of this review will be utilised to set the 3 year plan for FY2025 to FY2027.</p>

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 their 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
- As mentioned above, the annual compliance training for all employees that also includes health and wellbeing, respect in the workplace, professional conduct and anti-bribery and corruption
- A whistleblower policy with associated procedures and a hotline provided by an independent third party

- 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.

Including the on-going implementation of a supplier due diligence process and the annual updating of policies, 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 minimized if not avoided altogether.



Sculptform  
Melbourne, Australia



# 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 FY2024 against our Modern Slavery Action Plan.

Woods Bagot's modern slavery risk management approach is reviewed biannually by the Audit and Risk Committee, with periodic 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 7C Holdings Pty Ltd on 10 December 2024.



**Sarah Kay**  
Chief Executive Officer





# 07 Modern Slavery Act 2018 (CTH) – Statement Annexure

Mandatory reporting criteria required by Modern Slavery Act 2018	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