

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

URBIS

# MODERN SLAVERY STATEMENT

UNDER THE MODERN  
SLAVERY ACT 2018 (CTH)

1 JULY 2020 – 30 JUNE 2021




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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](http://www.legislation.gov.au/Details/C2018A00153)



# 01 OUR CONTINUING COMMITMENT

**We are pleased to lodge this Modern Slavery Statement, in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)* (the Act).**

Urbis is an organisation that works to improve and positively shape our communities and our cities, by creating places and spaces to improve the lives of the people who use them.

This is the second Modern Slavery Statement lodged by Urbis. It reports our progress against the ongoing task of identifying, assessing and addressing the risks in our supply chains and operations.

In the 12-month reporting period following our first Modern Slavery Statement, we have continued to implement tailored due diligence measures, including policy development and targeted supplier engagement.

Our role as an ethical and responsible business is firmly entrenched in all that we do. Our efforts to combat modern slavery continue to be driven from the highest level of our organisation, and we recognise that an effective response requires an ongoing focus on continual improvement across our business operations.

Our modern slavery risk profile has not materially changed between the first and second reporting periods. Based on the consistent nature of our day-to-day operations and established supply chains, our overall risk profile continues to be assessed, in relative terms, as being low.

Areas of key progress in our efforts to combat modern slavery risks during the reporting period include:

1. Continued risk assessment of suppliers.
2. Development and initial implementation of a Supplier Code of Conduct.
3. Targeted supplier engagement.
4. Development of a training program for staff incorporating a targeted modern slavery module.

As we acknowledged in our first Statement, this is an ongoing commitment. That remains the case. Until the scourge of modern slavery is eradicated, it remains the responsibility of every global company, including Urbis, to continue to take meaningful action to achieve such a crucial goal of sustainable business.

This Modern Slavery Statement has been approved by the board of **Urbis Pty Ltd (ABN 50 105 256 228)** in its capacity as the principal governing body of Urbis Pty Ltd on **19 December 2021**.

Pursuant to the requirements of the Act, authorised persons have reviewed the contents of this Statement and confirmed its accuracy.

This statement is signed by Timothy Blythe in his role as Director on **20 December 2021**.



**Tim Blythe**  
Director & Managing Partner

# 02 WHO WE ARE AND WHAT WE DO

## SHAPING CITIES AND COMMUNITIES 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.

The mandatory reporting entity under the Act is **Urbis Pty Ltd** - ABN 50 105 256 228 ('**Urbis**'). This statement relates to the operations of Urbis and the group of entities that are wholly owned and controlled by Urbis and form part of the consolidated group. Details of the entities making up the group can be found at Appendix 1.

As reported in our first Statement, Urbis launched a new business in 2016 operating under the trading name Cistri. Through Cistri, we continue to expand our professional services across markets in Asia and the Gulf region of the Middle East. This international business is conducted through the Cistri Group of Companies, which operates out of an office in Singapore.

 Singapore

 Perth

 Brisbane  
Gold Coast

 Parramatta

 Sydney

 Geelong  
Melbourne



# OUR STRUCTURE AND OPERATIONS

We are professional advisors to the property sector with an Australian and global focus, across a broad range of industry sectors including:



Commercial



Education



Energy &  
Renewables



Government



Health &  
Aged care



Industrial



Infrastructure



Mixed use



Residential



Retail



Telecommunications



Tourism &  
Leisure

We continue to have a diverse range of clients and stakeholders from the sectors, including property developers, owners and investors, private and public companies, NGO's, community groups, industry associations and all levels of government.

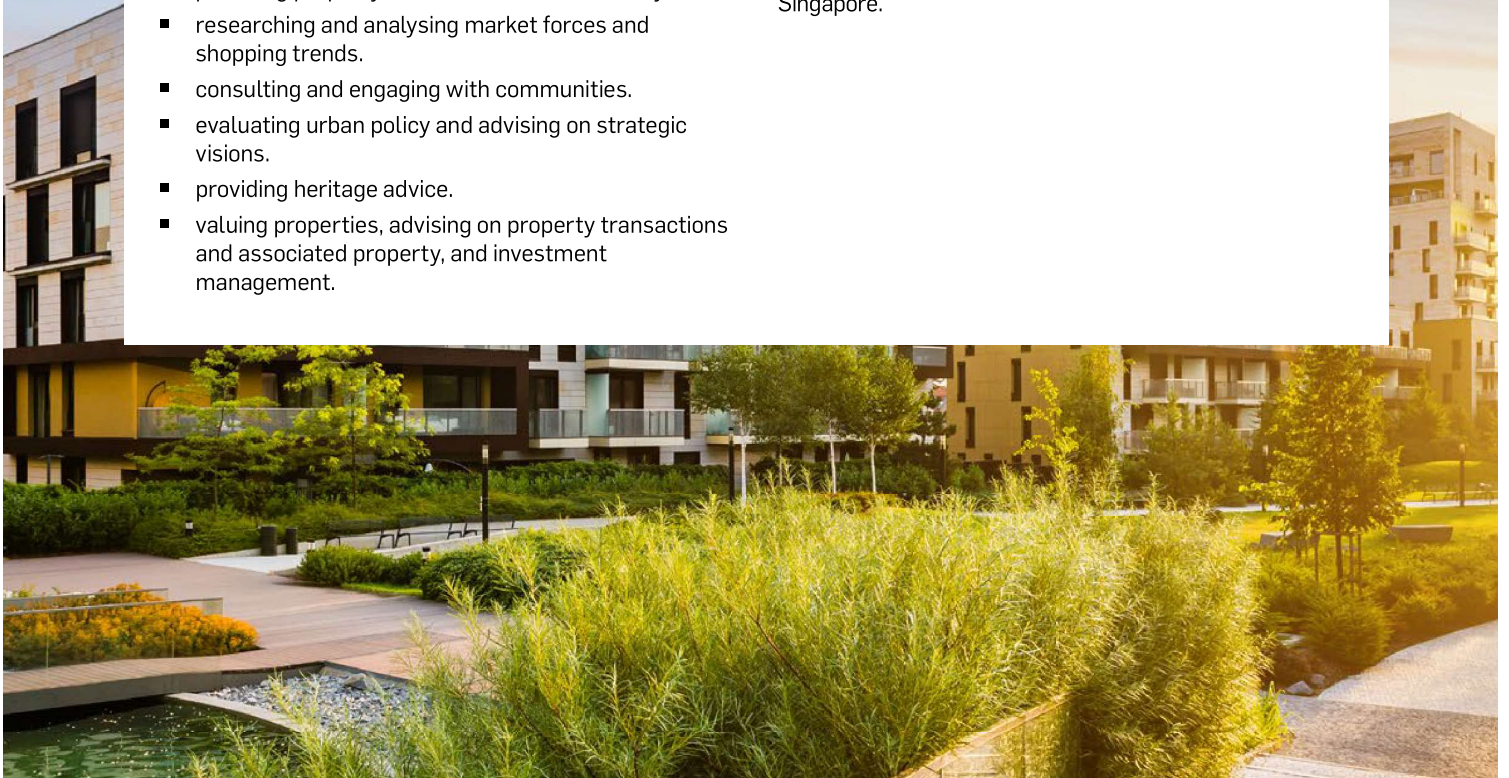
Our professional services include the following areas:

- design and master plan urban developments.
- guiding development projects through the complex process of 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, and investment management.

Urbis is also involved in advising various levels of government on implementing and reviewing a broad range of government social and economic programs and initiatives, including initiatives external to the property sector.

Urbis is Australian based with operations in the Australian cities of Brisbane, Gold Coast, Sydney, Parramatta, Melbourne, Geelong and Perth. Our international office is located in Singapore.






During the reporting period, Urbis' total workforce was comprised of approximately 600 people. This total workforce consisted of approximately 590 employees within our Australian operations and approximately 10 employees working out of our international office in Singapore.



# OUR SUPPLY CHAINS

Over the reporting period, Urbis engaged over 667 direct suppliers, spread across a broad range of industry sectors. A significant proportion of the goods and services we receive from our direct suppliers are closely related to the professional services Urbis provides to our clients.

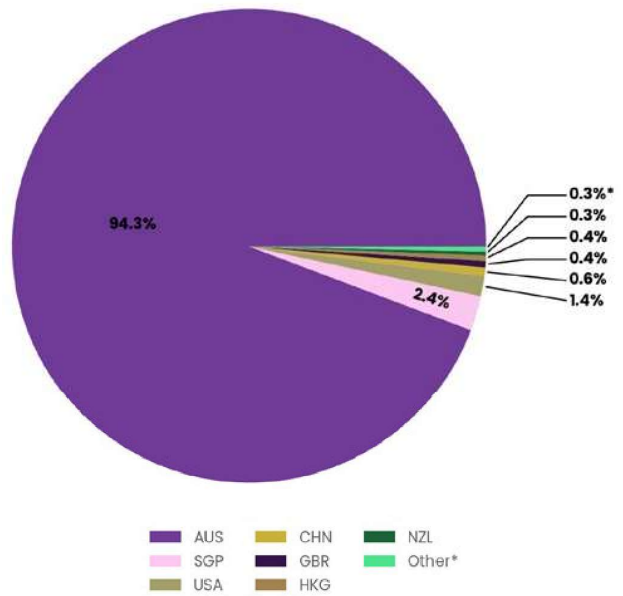
The predominant industry categories represented in our direct supplier relationships include:

-  Business services
-  Computer and technical services
-  Market research services
-  Banking
-  Employment placement services
-  Legal & Insurance services
-  Architectural services
-  Real Estate

These suppliers are primarily Australian-based entities. They range from large multinationals to smaller Australian-based entities and individuals, including an array of sole practitioners. A small percentage of suppliers assist us with our operations in Singapore in connection with Cistri's international business activities.

A remaining small percentage of our direct suppliers are located overseas, including Great Britain, the United States, New Zealand and China. The percentage breakdown of Urbis' direct suppliers by location is demonstrated in the graph below.

We acknowledge that the location of a supplier's operations can have a significant bearing upon overall modern slavery risk. For that reason, we are continuing to monitor the risks associated with our international operations and suppliers.



  
**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 ASSESSING RISKS OF MODERN SLAVERY

No actual or suspected instances of modern slavery were identified in Urbis' operations or supply chains during the reporting period. As a consultancy firm working predominantly in the property sector, our operations and those of our direct suppliers are relatively removed from the most prevalent risks of modern slavery, including those that can potentially be associated with the broader property sector.

In continually assessing the risks of modern slavery in our operations and supply chains, Urbis continued to engage with its expert advisors on modern slavery to undertake a further risk assessment of our operational supply chains. A summary of the methodology of the proprietary risk assessment is set out in Appendix 2.

Consistent with the results of the risk analysis reported in our first Statement, the updated risk assessment for the current reporting period assessed our overall modern slavery risk profile as being low. The updated risk assessment identified three general industry categories as areas of focus, influenced by a higher proportionate spend in these industry categories:

  
**Dwelling  
 Ownership in  
 Australia**

  
**Business  
 Services in  
 Australia**

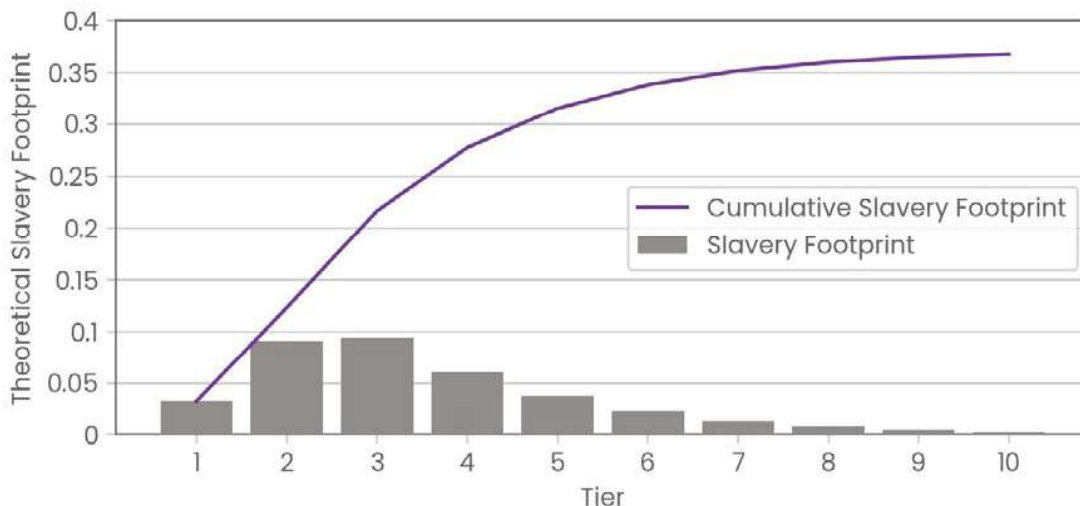
  
**Market Research  
 and Other Business  
 Management Services  
 In Australia**

A brief explanation of the above industry categories together with the associated supply chain maps for these categories is included at Appendix 3.

There is limited risk of modern slavery associated with these industry categories at the direct supplier level (i.e., at Tier 1). This is demonstrated in the below plot graph which depicts a visualization of the probable number of slaves relied upon in our supply chain by individual tier, highlighting that the greatest risk of modern slavery is estimated to occur beyond our direct suppliers, with the most elevated risk occurring at Tiers 2 and 3, and beyond. The further removed the risk is from our direct suppliers the more difficult it becomes for us to address and control.

For the two categories of Business Services and Market research and other business management services, the elevated risk is primarily attributable to the high incidence of electronic device inputs, such as computers, that commonly include components manufactured in regions associated with a higher risk of modern slavery. Urbis is encouraged that two of its major direct suppliers of this equipment, as mandatory reporting entities under the Act, have made public commitments to investigate and audit their supply chains, adopt remediation frameworks, and have implemented remedial and corrective action to address modern slavery risk.

Urbis continues to place greater emphasis in its due diligence focus on suppliers in these industry categories.



# 04 ACTION TO ADDRESS MODERN SLAVERY RISKS

Urbis remains committed to continually improving our modern slavery response. During the reporting period, we have implemented additional due diligence measures and other initiatives, set out below.

## SUPPLIER CODE OF CONDUCT

In our first Statement, we committed to develop a Supplier Code of Conduct with provisions specifically addressing modern slavery issues. We have completed the first step in implementation by updating our sub-consultant agreement templates to require compliance with the Code.

Our subconsultants make up a key part of our supplier base and the natural starting point for implementing the Code. We intend to finalise the implementation over the next reporting period in relation to our broader supplier groups.

In developing the Code, we have followed best practice recommendations from the Responsible Business Alliance Code of Conduct 7.0. Urbis' commitment to adhering to key international and recognisable standards including the UN Declaration of Human Rights, ILO International Labor Standards and the OECD Guidelines for Multinational Enterprises is outlined in the Code's provisions.

The Code unequivocally condemns all forms of modern slavery and clearly defines our zero-tolerance approach to suppliers. It also includes contact details and a commitment to swift and fair action for our suppliers to raise concerns.



**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](http://www.reutersevents.com/sustainability/supply-chains/modern-slavery-and-role-business)



## SUPPLIER ENGAGEMENT

A key focus for this reporting period has been targeted supplier engagement. Our first Statement detailed our commitment to working collaboratively with our suppliers, in select industry categories with an identified elevated risk potential, to assess their due diligence efforts including those in the industry categories of:

- Dwelling and Ownership.
- Business Services.
- Market Research and Other Business Management Services.

We prioritised over 30 of our continuing suppliers identified as having a higher risk potential, a large proportion of whom fall within these categories, for participation in a self-assessment questionnaire. The questionnaire covered the following areas:

- Modern slavery risk assessment and audit procedures.
- Supply chain visibility, including subcontractor usage.
- Internal governance structures, including policies and procurement practices.
- Grievance procedures.
- Modern slavery provisions in Supplier Codes and/or Contracts, including enforceability mechanisms.
- Organisational modern slavery training, including supplier training.
- Geographical issues relating to procurement practices.

The following key insights were gained from the suppliers responses received:

- The majority had either mapped their supply chain, or were in the process of undertaking comprehensive mapping exercises in relation to modern slavery risk issues.
- Most followed appropriate protocols surrounding employment contracts and pre-employment conduct
- A small minority used periodic sub-contractors or labour hire agencies.
- Most were not mandatory reporting entities under the Act. There was a clear correlation with these suppliers and an absence of internal frameworks aimed at addressing modern slavery risks.

We recognise that the success of our future engagement initiatives with non-reporting suppliers presents a challenge. However, we endeavour to continue to improve awareness surrounding modern slavery risk issues with these suppliers.

## EDUCATION & TRAINING

We have begun developing and implementing a comprehensive online training program that includes a specific modern slavery module for our vendor engagement and procurement teams. This specific modern slavery module will be tailored to practically address the issues faced by our supplier facing teams. Roll out of the module is due during the next reporting period.



# 05 MEASURING THE EFFECTIVENESS OF OUR ACTIONS

**Urbis has developed the following key performance indicators to assist in benchmarking our modern slavery activities and progress:**

- Urbis is a member organisation of the Australian Property Institute (API), and the Property Council of Australia (PCA). These organisations facilitate various modern slavery initiatives. Urbis engaged with these industry bodies during the reporting period through the informed 365 platform, a PCA initiative seeking to gather industry wide information regarding supplier modern slavery exposure. Participation in the informed 365 platform permits Urbis to benchmark its response against industry compliance expectations. Urbis recognises the positive outcomes of these collaboration initiatives and will continue to engage with the API and PCA.
- Engage on modern slavery issues with our suppliers including those who have so far been non-responsive. Extra attention will be given to suppliers within the industry categories flagged in Part Three of our Statement as having an elevated modern slavery risk.
- Launching a modern slavery training module for our vendor engagement and procurement teams including participation monitoring and assessment to gauge understanding.
- Finalising the rollout of the Supplier Code of Conduct.

# 06 CONSULTATION WITH OWNED OR CONTROLLED ENTITIES AND OTHER RELEVANT INFORMATION

In preparing this Modern Slavery Statement, consultation with the separate wholly owned legal entities that form part of the Urbis' group of companies has occurred. Our response to modern slavery risk issues is an organisation-wide effort, and significant collaboration is involved.

The comprehensive supply chain assessment for modern slavery risks, along with other due diligence and remediation measures discussed throughout this Statement, have been undertaken for all supply chains and operations for each of the separate controlled entities described in this Statement.





# A1 APPENDIX 1 REPORTING ENTITIES

This statement relates to the operations of **Urbis Pty Ltd** (ABN 50 105 256 228), an Australian registered proprietary company, which is the mandatory reporting entity under the Act.

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

- Urbis Services Pty Ltd
- Urbis Valuations Pty Ltd
- Urbis Investment Management Pty Ltd
- Urbis Property Services Ltd
- Cistri Pty Ltd
- Urbis Keys Young International Pty Ltd
- Cistri (Group) Pte. Limited and its subsidiaries Cistri Pte Limited and Cistri Limited

# A2 APPENDIX 2 RISK ASSESSMENT METHODOLOGY SUMMARY

As discussed in Part Three of this Statement, we continued to engage with our expert advisors on modern slavery to carry out a further comprehensive modern slavery risk assessment and mapping of our supply chains. This baseline exercise continues to inform our focus for ongoing due diligence and remediation activities across not only the present but also future reporting periods.

Incorporating company spend data throughout global markets, we have utilised the expert advisor's proprietary technology to trace the economic inputs required to produce products and services sourced from Tier 1 direct suppliers to Tier 2 suppliers, Tier 2 suppliers to Tier 3 suppliers, and so on, all the way to Tier 10 suppliers of the supply chain of Urbis' top suppliers by spend.

This supply chain mapping was performed using a balanced, global Multi-Regional Input-Output (MRIO) table which links supply chain data from 190 countries, and in relation to 15,909 industry sectors. This MRIO table is assembled using data sourced from international agencies including the United Nations, the European Commission, the Australian Bureau of Statistics and other national data agencies.

The MRIO table is then examined against various international modern slavery risk standards and a proprietary algorithm applied to synthesise publicly available risk data against the MRIO table.

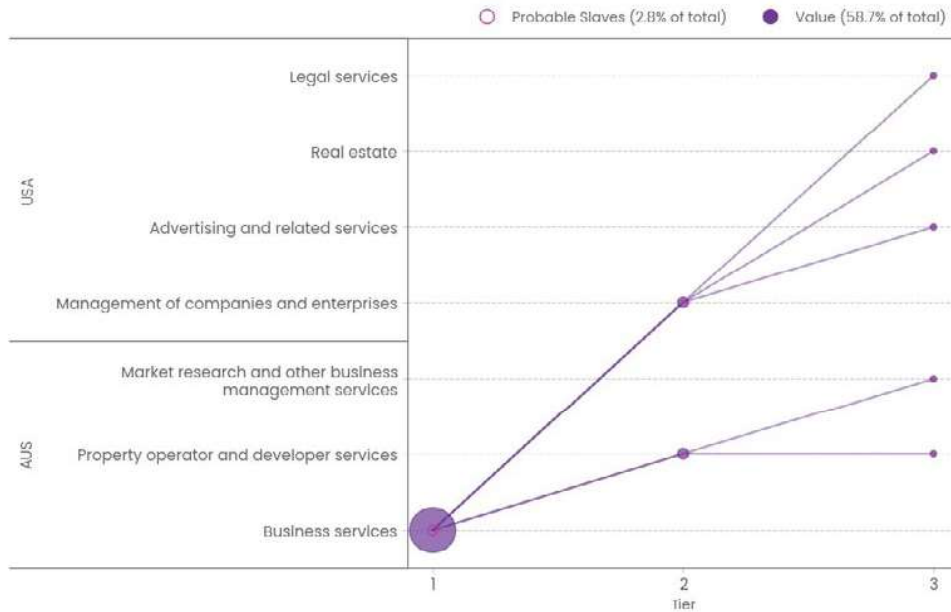
This process permits Urbis to create a modern slavery risk profile to Tier 10 for each of its suppliers at an industry and country level. The analysis does not confirm the actual existence or non-existence of slavery in the Urbis' supply chains and operations, which we note is not required under the Act.





## GRAPH 2: URBIS BUSINESS SERVICES SUPPLY CHAIN MAP

This industry category includes a range of short-term specialist and professional service providers that support the delivery of services to our clients and as well as relatively low value consumable office and stationery product supplies and printing services. It remains the category with the highest overall relative modern slavery risk albeit reduced as compared with the findings reported in our first Statement



## GRAPH 3: URBIS MARKET RESEARCH SUPPLY CHAIN MAP

This category covers a range of supporting business services such as IT, education/training, and specialist sub-consultancy services. The majority of our direct suppliers in this category are Australian-based entities, made up of highly skilled workers.

