



Modern Slavery Statement

*Under the Modern
Slavery Act 2018 (CTH)*

1 July 2024– 30 June 2025

Principal Governing Body Approval

The Board of Directors of Urbis Ltd (ABN 50 105 256 228) approved this Statement under the *Modern Slavery Act 2018* (Cth) ('Act') on 27 November 2025.

The contents of this Statement have been reviewed, confirmed as accurate, and signed by a duly authorised person pursuant to the requirements of the Act.

This statement is signed by James Tuma in his capacity as Director on 27 November 2025.

A handwritten signature in black ink that reads "James Tuma". The signature is written in a cursive, slightly stylized font. A horizontal dashed line is positioned directly below the signature.

James Tuma
Director & Managing Partner, Urbis Ltd

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01

Reporting Entity Structure, Operations, Supply Chains and Consultation

This is the Modern Slavery Statement of **Urbis Ltd** for the financial year ending 30 June 2025.

Operations

Urbis' operations continue to have the same key characteristics as described in previous statements. Our core business continues to be in offering our clients a wide range of professional advisory services relating to:



Urban planning and design



Landscape architecture



Urban and property economics, valuations and property transactions and management



Strategic advisory



Social planning and public policy



Heritage, heritage architectural design, and archeology

Urbis' operations are predominantly Australia-based, with offices in Brisbane, the Gold Coast, Sydney, Parramatta, Melbourne, Geelong and Perth.

Our international business activity primarily comprises the provision of professional services to clients in Asia and the Middle East and is conducted through the Cistri Group of companies out of our office in Singapore.

Urbis' team as of 30 June 2025 includes a total of 919 employees (increased from 873 employees at the end of FY24). The majority of these employees (802 or 87.3%) are permanent full or part-time employees, with a relatively small proportion of these employees being casual (101 or 11%) or fixed term (16 or 1.7%). We also continue to engage a small number of independent contractors and agency workers, who fulfill technical and highly skilled roles. As of 30 June 2025, Urbis had 25 independent contractors and 3 agency workers. The workforce composition proportions as of 30 June 2025 remain consistent with the composition proportions for prior years.

Supply chains

Urbis engaged with a total of 864 direct (Tier 1) suppliers during the reporting period. This represented a slight reduction on the 892 direct suppliers described in the statement for the previous reporting period. Due to the consistency in our overall procurement activity, including the categories of suppliers with which we engage, we do not consider this year-on-year shift to be significant from a modern slavery risk perspective.

More than 91% of Urbis' direct suppliers are Australian-based and predominantly fall within the following Australian sector-based industry classifications:



Architectural services



Banking and finance services



Business services including advisory, telecommunication and promotional



Computer and technical services



Employment placement services



Office supplies, stationery, equipment and furniture



Legal and Insurance services



Market research services



Hospitality and Accommodation



Real Estate services



Utilities



Professional association membership



Health, recreational and social services



Uniforms and marketing merchandise



Vehicle rental

For the international procurement in the reporting period, the Urbis Group sourced goods and services from 74 overseas suppliers. This represents a slight increase on the 71 suppliers in the previous reporting

period but otherwise remains broadly consistent with prior years. Key information relating to our first-tier international suppliers is outlined below:

Country	Trend in supplier numbers	Industry category(ies) in which supplier(s) operate
 Singapore	Decrease to 38 (39 in FY24, 47 in FY23)	Office supplies, real estate, travel service providers, computer and technical services, professional services, banking & financial services, professional association memberships and recruitment consultants
 USA	Decrease to 5 (9 in FY24, 11 in FY23)	Computer and software services, and professional services
 Indonesia	Decrease to 1 (3 in FY24, 6 in FY23)	Professional services sub-consultants
 United Arab Emirates	Decrease to 2 (5 in FY24, 3 in FY23)	Professional services sub-consultants
 China	Decrease to 1 (4 in FY24, 3 in FY23)	Professional services sub-consultants
 Malaysia	Increase to 4 (2 in FY24, 1 in FY23)	Professional business services & Professional association memberships
 United Kingdom	Increase to 7 (4 in FY24, 4 in FY23)	Education services, real estate and professional business services
 New Zealand	Increase to 3 (1 in FY24, Nil in FY23)	Professional business services
 Hong Kong	Increase to 3 (1 in FY24, 1 in FY23)	Professional business services
 Kingdom of Saudi Arabia	Increase to 3 (Nil in FY24 & FY23)	Professional services sub-consultants
 The Netherlands	Increase to 1 (Nil in FY24)	Computer and related services
 India	Increase to 2 (1 in FY24, 3 in FY23)	Computer and related services
 Italy	Increase to 1 (Nil in FY24)	Real estate services
 Germany	Increase to 1 (Nil in FY24)	Computer and related services
 France	Increase to 1 (Nil in FY24)	Computer and related services

Corporate structure

The Urbis Group includes the following ten (10) wholly owned and controlled entities of Urbis Ltd (none of which are individual reporting entities under the Act):

- Urbis Valuations Pty Ltd
- Urbis Services Pty Ltd
- Urbis Property Services Pty Ltd trading as Urbis Heritage Architecture
- Urbis Qld Pty Ltd
- Urbis Investment Management Pty Ltd¹
- Urbis Policy Pty Ltd¹
- Cistri Pty Ltd¹
- Cistri (Group) Pte. Limited¹ and its subsidiaries Cistri Pte Limited and Cistri Limited¹

These entities are covered by the descriptions contained in this statement. Consultation has occurred with all owned and controlled entities for the purposes of preparing this statement and in relation to the overall anti-slavery response of the Urbis Group.

The principal governing body of the Urbis Group is our Board of Directors for Urbis Ltd.

¹ These are non-trading entities. In FY25, Urbis Investment Management Pty Ltd ceased trading with all trade-based activities moving to Urbis Services Pty Ltd (also a wholly owned subsidiary of Urbis Ltd). In previous reporting periods, Urbis Policy Pty Ltd, was mistakenly referenced as a trading entity. Urbis Policy Pty Ltd is, and has always been, a non-trading entity.

02

Identifying, assessing and addressing areas of potential Modern Slavery risk

Urbis did not receive any reports of, or otherwise identify, any incidents of actual or suspected modern slavery in its operations in the reporting period.

Supply chain

We continued our long-standing relationship with an external specialist consultant, including for the purpose of updating our annual modern slavery risk assessment utilising the consultant's proprietary risk assessment model and our supplier spend data.

The proprietary model takes our supplier spend data and classifies suppliers by sector (industry and country) before ordering sectors by risk profile. Sectorial risk is determined by reference to the leading current estimates of modern slavery incidence at national and industry levels, and accounts for both operational and supply chain risk within a particular sector.

Using this approach to identify and assess modern slavery risk, Urbis' suppliers are classified according to not only the modern slavery risks within their own operations ('Tier 1 risks') but also the risks attaching to the suppliers own supply chains down to the ninth level of sub-supplier ('Tier 10 risks'). This assessment continues to inform our overall strategy in relation to the ongoing identification and implementation of improvements in and gauging the effectiveness of our anti-slavery response.

The annual updated risk assessment continues to return consistent results, which is indicative of the overall consistency in our procurement activity year-on-year.

The following Australian sectors continued to be assessed as potentially having a greater elevated modern slavery risk contribution (in relative terms within our supply chains):

- **Retail Trade:** including our office goods supplies such as stationery and other day-to-day office consumables.
- **Business Services:** including a range of professional service providers, such as consulting, legal, marketing, and accounting services.
- **Hotel and Restaurant Services:** including a range of corporate catering, hospitality suppliers, restaurants / cafes, and accommodation providers. We engage these suppliers in connection with our team members undertaking work travel for client projects, conferences and other business reasons.

- **Real Estate Services:** including the commercial office leasing and other property-related suppliers.

Consistent with the outcomes of the corresponding assessments performed for prior reporting periods, the potential for an elevated modern slavery risk contribution from these sectors is influenced by our higher overall spend across the suppliers in these sectors as compared with suppliers in other sectors.

Operations

Whilst Urbis acknowledges the broader reality of modern slavery incidences in Australia, we consider that our direct operations remain, in relative terms, very low risk for modern slavery. This is due to the following core work force characteristics:

- Our team is primarily comprised of experienced professionals holding tertiary qualifications.
- Our employees are engaged under written employment contracts that made subject fully to Australia's comprehensive statutory workplace protections.

The international operations of the Urbis Group, conducted through the Cistri Group of companies, continues to engage independent contractors to assist in -fulfilling discrete, technical (and is generally desktop-based) engagements for client projects in the Asian and Middle East markets. For example, all suppliers engaged in Indonesia, China, the United Arab Emirates and the Kingdom of Saudi Arabia, and 3 of the 4 suppliers in Malaysia were for this purpose. The other supplier in Malaysia was a professional industry association membership. In Singapore, 6 of the suppliers were for this purpose with the other suppliers falling into industry sectors associated with operating and maintaining the office premises.

To mitigate against the potential risk with international suppliers exploiting their contracted workforce, Urbis engages reputable independent contractors, where possible through reputable international firms, and seeks to practicably align and ensure consistency of the contractors' terms of engagement with those employed in Urbis' Australian operations.

Some Key Features of Our Continuing Anti-Slavery Response

The Urbis Group continues to address modern slavery risk through the implementation of a range of measures across the key pillars of governance and policy, internal education / training, industry collaboration, supplier engagement and due diligence.

Governance and Policy

Urbis' Group Legal team continues as our Key Risk Owner for addressing modern slavery risk issues. Any material modern slavery concerns and initiatives are raised in the quarterly compliance updates to the Urbis Group Risk Committee, which submits a group risk update to the Urbis Executive Group, which in turn updates the Urbis Board.

The Procurement Procedure Working Group continues to provide input and assistance with modern slavery risk mitigation initiatives directed at both new and existing suppliers. Its composition continues to include members from Urbis' Office Services, Group Legal, Information Technology and Group Finance teams.

Modern slavery-related policies described in our previous statements continue to apply.

Progress during the reporting period included Urbis developing a comprehensive new Procurement Procedure with implementation underway.² Once fully implemented, the new Procurement Procedure will establish a framework for the procurement of all goods and services and associated activities across all supplier types (including via sole traders, independent contractors, sub-contractors and corporate entities). The Procedure will formalise the Urbis Group's ongoing approach to supplier due diligence and screening for various ESG risks, including our standard practice of conducting modern slavery risk screening for all new vendors.

Education and Training

Urbis staff continue to be trained in identifying and responding to modern slavery issues.

With our ongoing internal education initiatives, we aim to ensure both that:

- all staff are equipped with an essential understanding and awareness of modern slavery, and
- staff undertaking activities with greater potential for exposure to modern slavery risk factors are provided with additional training. For example, those staff who regularly engage in the procurement of goods and services.

All new staff undertake an informative modern slavery training e-module at onboarding. All new staff in the Technology & Digital, Office Services, Group Finance and Group Legal teams and those staff who otherwise regularly engage in procurement activities undertake an additional in-depth modern slavery risk training e-module.

Training completion rates for this reporting period are over 96% for all staff required to undertake the information training, and 88% for those required to undertake the additional in-depth training. The staff with outstanding training is largely comprised of recent new starters for whom completion is not overdue and those staff on long-term leave.

Urbis also supports relevant members of staff to further advance their awareness of modern slavery, and risk mitigation skillset by attending education sessions conducted by industry bodies and other professional services firms. In FY25, sessions attended by Urbis' staff included webinars on Modern Slavery Grievance Mechanisms, Supply Chain Risk Management (Tier2 & beyond) and Modern Slavery Compliance: protecting your business and reputation.

Industry Participation

Urbis also participated in industry collaboration throughout the reporting period through the use of and contributions submitted to ESG compliance portals operated by Property Industry representative bodies and specialist procurement compliance platforms appointed by individual clients including Informed365 (Property Council of Australia) and the Felix procurement platform.

During the reporting period Urbis also responded to numerous modern slavery survey questionnaires and information requests received via compliance portals and directly from individual clients drawn from a diverse range of sectors including government.

The underlying reasons for the surveys and requests included supporting the client's modern slavery compliance program and as a necessary pre-condition for engagement on particular client projects. The content of the questions and requests varied considerably from single enquiries about the Urbis modern slavery reporting status through to comprehensive survey questionnaires directed at: organisational structure and size; staff training, education and knowledge; supplier engagement and risk assessment; policies and procedures; worker dialogue; performance and remediation; sub-contracting and third party recruitment practices; and whether workers at Urbis Australia are recruited from overseas (which Urbis does not undertake).

2. The Procurement Procedure is planned for full implementation in the next reporting period.

Supplier Engagement and Due Diligence

Urbis continued to undertake the following supplier engagement and due diligence:

- Pre-screening for modern slavery risks (within the broader Urbis framework of a holistic ESG-issue assessment) for all new 'material' suppliers (with a total estimated annual spend value of \$2,000 or more).

The internal sponsor proposing to appoint a new supplier is required to complete a New Vendor Form, detailing information relevant to modern slavery risk assessment. This information is then used to conduct media and public information screening through the Ethixbase360 platform. Pre-screening addresses key modern slavery risks, along with other ESG-and compliance related considerations. Urbis uses Ethixbase360 to assess whether a proposed supplier's risk profile is acceptable.

- Desktop-based checks for contractors and subconsultants engaged for client projects in higher-risk countries. These desktop-based checks are conducted by Urbis in-house in addition to the Ethixbase360 pre-screening.
- Urbis has adopted three key template agreements directed at the procurement of goods and services all of which include a contractual requirement that the supplier comply with the Urbis Supplier Code of Conduct. The templates comprise an agreement for engaging subconsultants on client projects, engaging independent contractors to fulfill Urbis Group internal projects and another for the procurement of information technology goods and services. When engaging suppliers other than with an Urbis template agreement, Urbis ensures a modern slavery compliance obligation is included in the procurement agreement.
- Completing the foundational stage of a planned longer-term direct engagement process with each of Urbis' professional office cleaning service providers. This included direct supplier information requests³ relating to whether the service provider has:
 - obtained external anti-slavery-related accreditations or certifications, such as under the Cleaning Accountability Framework (CAF) and/or the service provider is a reporting entity for modern slavery;
 - implemented a formal modern slavery response; and/or
 - appropriate terms of employment, including complete coverage with written employment contracts.

The responses received confirmed that the cleaning service providers at the Urbis offices in Brisbane, Melbourne, Sydney, Parramatta and Perth and Cistri in Singapore comply with the criteria listed above. The service providers at the Geelong and Gold Coast offices remain unchanged from the previous reporting period and as previously reported are not reporting entities under the Act. Taking account of their smaller turnover, Urbis remains satisfied that the two cleaning service providers at these offices are appropriately mitigating or taking active steps to better mitigate the modern slavery risks that are inherent in the cleaning industry sector.

In recognition of the need to specifically address the potential for an elevated modern slavery risk associated with professional cleaning services in Australia, the Urbis Group intends to continue engaging with the office cleaning service providers at its smaller offices (and its other larger providers generally) on modern slavery risk mitigation initiatives.

Grievance and Remediation

As described in previous statements, the Urbis Whistleblower Policy and Procedure outlines how concerning conduct can be safely and appropriately reported by Urbis employees and contractors via an independent Whistleblower Hotline. It also outlines the procedure for the investigation of reports received under the Policy by the dedicated Whistleblower Investigations Officer. Investigation outcomes are reported to the dedicated Whistleblower Protection Officer and if they conclude unacceptable conduct has occurred, a report is made to either the Urbis Chief Executive Officer or Chairperson, which report includes the recommendations (if any) on remedial actions.

3. This external engagement occurred after the reporting period but prior to the lodgement of this statement.

03

Measuring effectiveness and planned focus areas

Urbis considers the modern slavery risk assessment of our supplier annual spend data, utilising our consultant's proprietary assessment model and which Urbis has undertaken for all prior reporting periods, in combination with the outcomes of our risk assessments and due diligence on individual suppliers (current and prospective) provides a primary measure of the overall effectiveness of our modern slavery response. The annual supplier spend risk assessment and individual supplier risk assessments are considered internally as 'business-as-usual' practices.

Whilst we view the consistent implementation and outcomes of core measures as a key indicator of effectiveness for this reporting period, we have also made notable improvements, including through the following initiatives:

- **Embedding enhanced modern slavery risk due diligence of suppliers, as part of a broader focus on ESG-issues:** Urbis has developed and adopted a Procurement Procedure that incorporates a mandatory requirement for ESG-related pre-screening of proposed suppliers including the assessment of potential modern slavery risk for the Urbis Group in engaging the supplier.
- **Integrating the Ethixbase360 due diligence platform into current procurement practices:** To facilitate enhanced due diligence of the modern slavery risk with its suppliers, Urbis has integrated the Ethixbase360 risk due diligence platform into its procurement procedure for pre-screening proposed suppliers before appointment.

Currently Planned Action for FY26

Urbis plans to improve and expand its overall anti-slavery approach in the next reporting period through several identified focus areas⁴:

- Continued direct engagement with the commercial office cleaning service providers to further enhance our understanding of their modern slavery risk mitigation approaches, building upon the existing engagement described in Part Two of this Statement.
- Finalising and implementing a Responsible Procurement Statement. This statement will align with the Urbis Supplier Code of Conduct and complement the Procurement Procedure (referenced above). It will outline the Urbis approach to, governance of and sustainability commitments in procurement and the Urbis expectations of its suppliers including in the context of ESG matters which includes modern slavery risk. It will also arm those Urbis staff responsible for procurement-related decision making with further guidance on how to appropriately select suppliers taking account of the supplier's approach to modern slavery risk and broader ESG-considerations. Finalisation and implementation of this statement is proceeding under the guidance of the Urbis Procurement Procedure Working Group.
- Extend the Ethixbase360 screening of prospective suppliers for modern slavery risk to existing and continuing international suppliers engaged prior to the implementation of the Ethixbase360 platform.
- Finalise the development of a formal measuring effectiveness framework.

4. Disclaimer: This Modern Slavery Statement contains certain forward-looking statements about anticipated modern slavery actions planned to be undertaken by Urbis in the FY26 reporting period. These statements reflect Urbis' reasonable expectations as at the date of preparing this Statement. Such forward-looking statements are predictive and are subject to risks, uncertainties and other factors that could cause actual action to differ from planned activities. Any forward-looking statements are not to be taken as guarantees, representations, warranties or assurance of Urbis' future performance or certainty that planned actions will be achieved.

