

Modern Slavery

STATEMENT FY2025



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Introduction

7C Holdings Pty Ltd (formerly Woods Bagot Holdings Pty Ltd) (herein referred to as ‘7C’) 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 7C during the financial year ending 30 June 2025 to assess and address the risk of modern slavery occurring in our operations and supply chains. This statement applies to 7C and the entities it owns or controls within Australia and overseas, trading as ERA-co, Woods Bagot, Customs Bureau and Impact Futures.

Our Structure, Operations, and Supply Chains

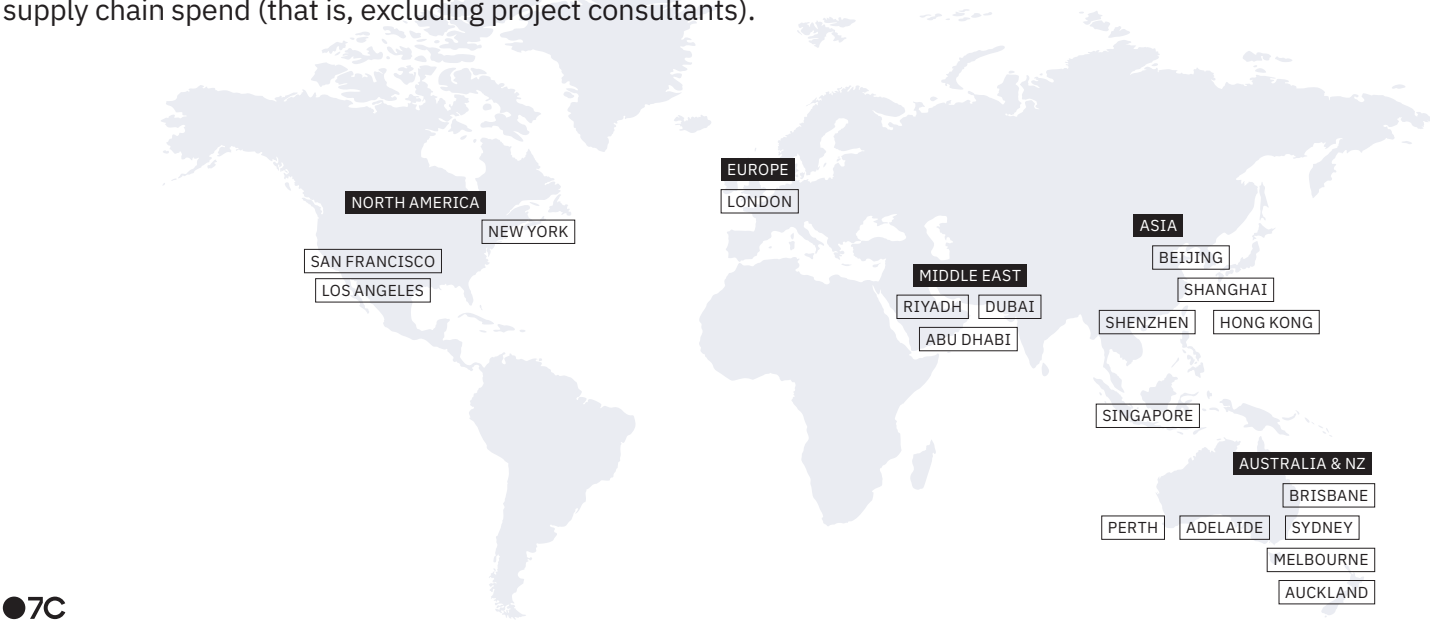
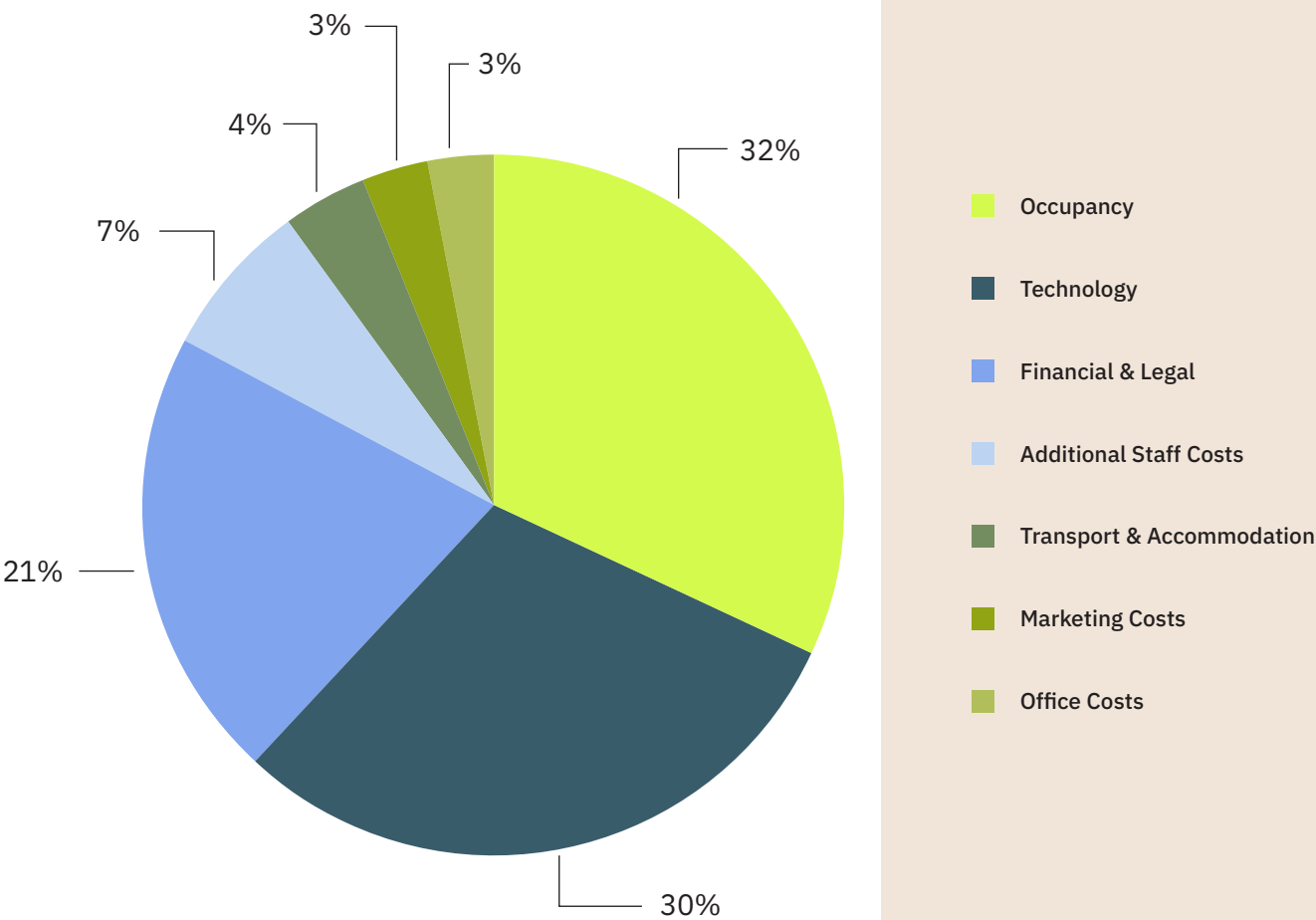
7C is a wholly owned global network of brands specialising in the built environment, including through the provision of services in sustainability, placemaking, urban design, architecture, interior design, luxury design, and strategy.

The 7C network works across a wide variety of sectors including workplace, retail, residential, transport, education and science, health, hospitality, and convention centres.

7C’s registered office is in Melbourne, Australia. We operate studios in 18 locations globally with approximately 1,000 employees.

Our supply chain consists of professional consultancy service providers that we collaborate with to assist in our service and project delivery. We also procure goods and services to support the ongoing operation and maintenance of our studios both globally and locally. In FY2025, we engaged with approximately 2,000 suppliers of goods and services across several sectors, amounting to a global spend of over AUD39 million for corporate suppliers and AUD62 million for project consultants. The chart on the next page provides a sector break down of our corporate supply chain spend (that is, excluding project consultants).

7C SUPPLIER SPEND FY2025
(Excluding subconsultants and project costs)



Modern Slavery Risks

In FY2021 7C 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.

7C 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 FY2025 a review was undertaken of 7C’s supply chains on both a project and corporate level, to determine the adequacy of the business’ 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, 7C considers the risk of modern slavery in our direct business operations to be low. However, our FY2024 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 services or have offices, particularly in the Middle East region. 7C has a robust system of Human Resources policies and procedures that support compliance by legally mandated employment requirements across our workforce. These policies apply to all 7C entities and operations globally.

Supply Chain Risks

The FY2024 modern slavery risk assessment found that 7C may have exposure to modern slavery supply chain risks in three areas, which continued to apply into FY2025:

1. Corporate Procurement

An analysis of the 7C 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

7C utilises a number of subconsultants to provide services in support of 7C’s key service offering. While 7C does not directly engage sub-consultants 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, 7C 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.

Risk Mitigation Actions

7C 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 business’ Audit and Risk Committee. Subject to annual review, updating, and approval of the Audit and Risk Committee, this Action Plan continues to guide the direction, resource allocation, and progress in risk mitigation at 7C. The updated progress of this plan for FY2025 is outlined on the following page.

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 reviewed at least bi-annually to ensure internal relevance and compliance with regulations
- Annual compliance training for all employees that includes health and wellbeing, respect in the workplace, professional conduct, and anti-bribery and corruption
- A whistleblower policy with associated procedures and training, 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. Additional corporate procurement processes have been developed during FY2025 to enable a greater depth in the due diligence process on suppliers, and to enhance the monitoring, assessment, and management of actual or potential modern slavery risk within these supply chains, which are to be implemented during FY2026
- Due diligence completed on new companies that we are looking to work with, both corporate suppliers and subconsultants, to ensure they align with our standards and approach
- Ensuring that relevant contracts include clauses relating to health and wellbeing and modern slavery
- Regular review of legislation, guidance information, and industry standards relating to health and wellbeing and modern slavery to ensure compliance and maintaining the highest standards.

Including the on-going implementation and development of a supplier due diligence process and the regular 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.

ITEM	ACTION	FY2025 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 7C’s commitment to prohibit modern slavery and to mitigate modern slavery risks within 7C.	<p>7C adopted a Supplier Code of Conduct in April 2023, together with the revision of any related policies and the development of standard contract terms to implement the Code and those policies within the commercial terms that are to apply to the arrangements with our sub-consultants and suppliers.</p> <p>The Code has been regularly reviewed for currency and relevance and updated to reflect changes that may be applicable to the business, including the expansion of the business into new regions, and providing services to additional or different sectors. The outcome of these reviews and updates to the Code have been reported to and approved by the Audit and Risk Committee. Other related policies have similarly been reviewed and updated as required.</p> <p>A further internal stakeholder consultation and in-depth review of supply chain risk within the 7C business will be conducted in FY2026, and the suitability and currency of the Code, related policies, and contractual terms will be assessed based on that consultation and review.</p> <p>The Code can be found on the 7C network’s websites.</p>
Risk Assessment & Supply Chain Mapping	Implement processes to gain a deeper understanding of the 7C 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 abovementioned 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>7C has implemented a supplier due diligence process for corporate procurement examining key ESG criteria, including modern slavery, which was applied during FY2025. The process incorporated an inbuilt risk rating based on country location, sector, and spend. It has already been applied to 75% of total corporate procurement spend.</p> <p>Additional corporate procurement processes have been developed during FY2025 to enable a greater depth in the due diligence process on suppliers, and to enhance the monitoring, assessment, and management of actual or potential modern slavery risk within these supply chains.</p> <p>Existing sub-consultancy agreement templates used by the business have been updated to include clauses requiring compliance with the Supplier Code of Conduct, and modern slavery laws and standards. Additional or revised templates include such clauses as they were developed.</p> <p>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 7C 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 and has been implemented during FY2025. This online training is compulsory for all personnel and formed part of the induction compliance training program for all new staff.
Grievance Mechanisms & Remediation	Extend grievance and remediation processes expressly to include modern slavery concerns, including publicising in the Supplier Code of Conduct.	Reporting concerns and violations is a key element of the Supplier Code of Conduct. This is supported by the well-established whistleblower reporting mechanism established within 7C and reinforced as part of the compliance training and is the subject of a separate, dedicated policy.
Monitoring, Review & Reporting	Conduct an annual review, in line with Australia’s modern slavery reporting obligations and any other applicable standards, of 7C’s modern slavery policies and processes to examine their effectiveness, and implement regular modern slavery working group meetings.	<p>Regular reporting occurred during FY2025. Refer to Section 05, Assessing Effectiveness.</p> <p>The methodology for the updated risk assessment included preparatory meetings with the internal operational steering group (see below), surveying a sample of employees, document review, a validation workshop, and provision of draft and final reports. The findings of each review were utilised to set, assess, and update the 3-year plan for FY2025 to FY2027.</p> <p>Commenced the recruitment process for an additional and specialist resource within 7Cto support the evaluation and management of supply chain and related risk, with a view to this resource commencing with 7C during FY2026.</p>

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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 and supported by an internal operational steering group consisting of subject matter experts, and external consultants (when required).

The modern slavery risk assessment (see section 3 above) assessed the adequacy of 7C’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 Section 04). This year’s statement includes an update on the progress made during FY2025 against our Modern Slavery Action Plan.

7C’s modern slavery risk management approach is reviewed 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.

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Consultation with Entities Owned or Controlled

7C consulted with the relevant companies it owns or controls in the development of this Statement. This included consultation with 7C 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 7C to ensure the effective implementation of our approach to modern slavery risk management.

This Statement was approved by the Board of 7C Holdings Pty Ltd on 10 December 2025.



SARAH KAY
CEO, 7C HOLDINGS PTY LTD



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Modern Slavery Act 2018 (CTH) – Statement Annexure

MANDATORY REPORTING CRITERIA REQUIRED BY MODERN SLAVERY ACT 2018	7C 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

