

Modern Slavery Act ZHA Statement 2025/26



This statement sets out ZHA Architect's ongoing commitment as a responsible business to help ensure that modern slavery and human trafficking is eradicated, in accordance with the Modern Slavery Act 2015.

Our business and structure

ZHA Architect's trades as ZHA. We are a global architecture and design company, providing high quality architectural designs globally, employing over 500 people across six offices worldwide. ZHA's business is managed from London. We provide the architectural design services for buildings, working with engineers and other consultants. The extent of our scope and responsibility will depend on the statutory requirements of the country, along with other considerations such as the needs of our client.

Our supply chains

Our supply chains primarily consist of professional consultancy providers acting as sub consultants, providing design and other services for us.

We recognise we also have relationships with suppliers of services to our offices, such as office cleaners, maintenance workers and other such support staff.

Our policies on slavery and human trafficking

ZHA has a zero tolerance approach to modern slavery and human trafficking. As such, we are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or any part of our business. This commitment extends to all individuals working for us at all levels and grades, including directors, associates, staff, consultants, contractors, seconded staff, agency staff, agents or any other person associated with us or any of our subsidiaries or their employees as part of our supply chain, in those locations where we work.

Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We also have in place a robust whistleblowing policy, designed to encourage and to protect anyone who wishes to raise concerns about wrongdoing within our business.

Due diligence and risk assessment

We consider that our supply chain of professional services consultancies presents a relatively low risk with regard to slavery and human trafficking. We recognise that we often operate in territories where there is often a medium to high risk of modern slavery.

With regard to our own staff, our recruitment processes are transparent and reviewed regularly. We communicate directly with candidates to discuss job opportunities and to confirm the details of any offers made. We have robust procedures in place for the vetting of new employees and ensure that we are able to confirm their identities and that they are paid into an appropriate, personal bank account. We ensure that our employees' salaries globally are paid on a fair and comparable basis and comply with local minimum wage standards.

If we discover that any of our employees have been complicit in human trafficking or modern slavery, we will take the appropriate disciplinary action against them.

We audit our suppliers on a regular basis. ZHA has committed to work only with organisations who share our values and who have pledged to assist in the eradication of slavery and human trafficking. They are well respected sub consultants, with whom we work often. We will not work with any organisation that has been found to have been knowingly involved in either human trafficking or modern slavery.

We monitor and review the controls undertaken by our suppliers and require, from all our suppliers, confirmation that they are committed and are taking action to prevent modern slavery and human trafficking. We ask that the businesses in our supply chain, including the sub-contractors and service providers we work with, adhere to our expectations in respect of their workforce. For example, we ask the businesses in our supply chain to confirm that they abide by local minimum wage standards.

We undertake occasional site visits of our suppliers in higher risk areas, and conduct interviews with workers at those sites to ensure continued compliance with the assurances given by our suppliers, and to determine the veracity of those assurances.

While we recognise that there is a heightened level of risk of modern slavery occurring in the construction industry, we tend not to have direct or indirect supply agreements with construction businesses: they will [almost] always contract directly with our clients, rather than with us. As such, our sector risk is also low. However, as architects, we are involved with contract awards and the supervision of construction sites to varying degrees of responsibility, and work with our local suppliers to ensure anti-slavery and human trafficking policies are part of the tender requirements and site practices by contractors. To this end, we work mainly with large recognised and respected organisations and carry out due diligence in relation to our sub-consultants to ensure we are aligned on our commitments to these policies.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, ZHA provides training to relevant members of staff and we have made our modern slavery policy available to all employees. All new starters are asked to review this policy.

Our effectiveness in combating slavery and human trafficking

During 2025/26, there were no concerns reported to us via our whistleblowing policy or any other channels within ZHA relating to slavery and human trafficking or in relation to any sub-contractors, service providers or other companies with whom we partner.

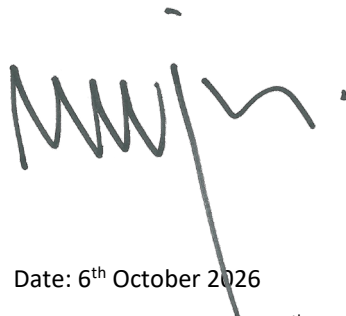
By asking our suppliers, service and consultancy providers to adhere to minimum wage standards and advocate policies preventing modern slavery and human trafficking, we are able to not only highlight these issues to them, but also to ensure we are showcasing the importance to ZHA in regards to preventing slavery and human trafficking globally and putting appropriate safety measures into place to prevent them.

The ZHA board of directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

We will continue to monitor and review our policy relating to slavery and human trafficking. If we become aware of any breaches of the policy, we will investigate and take such steps as are necessary to ensure that the risk of further breaches occurring is minimised.

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains, we are satisfied that our procedures are adequate. However, we will continue to monitor and review our policy and procedure to ensure their ongoing effectiveness.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30th April 2026.



Date: 6th October 2026

Date of board approval: 6th October 2026

