

Introduction

As required by the Modern Slavery Act 2015, this statement describes the steps that Handley House has taken to ensure slavery and human trafficking is not taking place in any part of the group businesses or of our supply chain.

Business and Organisational Structure

Handley House is the parent company which oversees international data and design practices. Our business is organised across two different brands, Pragma and Benoy. Bringing together commercial advice and strategic research, technical knowledge and design expertise, the companies deliver a holistic approach from data analysis, masterplanning and architecture, to urban and landscape design, interior design and wayfinding.

As a leading global design firm, we are rightly held to high standards in everything we do. Modern slavery is a crime and a violation of fundamental human rights. All types of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. As a RIBA Chartered Practice we conduct all our activities professionally and adhere to the RIBA Architects code. Our commitment to act responsibly emanates from the firm's executive leadership team at Group Board level endorsing the objectives of the Modern Slavery Act 2015. Our policy applies to all employees, contractors, consultants, agency workers and self-employed individuals working for Handley House Group.

Our policy on slavery and human trafficking

Handley House recognises we have a responsibility to take a robust approach to slavery and human trafficking. We are committed to acting ethically and with integrity in all our business dealings and relationships, to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our business relationships, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors and suppliers.

Through our policy, workers are free to terminate their employment at any point and also to enjoy freedom of movement. As part of our approach, we champion freedom of association and strictly prohibit the imposition of worker-paid recruitment fees. The confiscation of workers' original identification documents is also strictly prohibited. Moreover, we are committed to providing access to remedy, compensation and justice for any victims of modern slavery.

If any of the Handley House businesses suspect slavery and human trafficking by an associated party, we reserve the right to report such suspicions, and provide appropriate information to the relevant authorities, and to suspend or terminate any engagement, business arrangement or contract.

Risk Assessment

Our ongoing risk assessment is that we are at low risk of slavery and human trafficking occurring within our own business. However, we recognise the need to monitor and update our risk assessment periodically.

We acknowledge that slavery and human trafficking exists in many locations in which we operate, and/ or from which we procure goods or services. Accordingly, our focus remains on

refining and improving the procurement process with suppliers as we continue to refine and implement our procurement policy.

Our supply chain

As a provider of professional business services we do not have a particularly long or complex supply chain. Our key suppliers mainly relate to providers of goods and services to our design businesses, such as recruiters, cleaners, caterers, providers of printing materials and travel service agents. We expect all our suppliers to conduct their businesses in a lawful and ethical manner and require our service providers to meet the requirements of the Modern Slavery Act 2015 and minimum pay requirements for their location.

Employment

As a business working with a global client base and as an Equal Opportunities Employer we are committed to treating all job applicants and employees fairly and equally. This is embodied in the variety of employment policies shared with staff including our Equal Opportunities Policy, Whistleblowing policy, Grievance and Disciplinary Policy and Anti Bribery and Corruption Policy.

Training

We acknowledge that maintaining high standards of conduct requires more than the issuing of a policy document to staff. We achieve it by communicating our values and actions to our employees and stakeholders as we go about our daily business. We are committed to giving our employees the tools to guide proper behaviour, publishing policies on the employee intranet site and referring to them at induction and other training and development events.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Handley House Groups Modern Slavery and Human Trafficking statement for the financial year commencing 1 April 2025 and ending 31st March 2026.

The Handley House Executive Board approved this statement on 20.05.25.