

Modern Slavery Policy

INTRODUCTION

HKS Architects Limited (“HKS” or “the Company”) is committed to preventing modern slavery and human trafficking in all its forms. We recognize our responsibility to act ethically and with integrity in all business relationships and to implement effective systems and controls to ensure modern slavery does not occur within our organisation or our supply chains.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and covers the financial year ending 30 April 2025.

STEP 1: OUR ORGANISATION AND SUPPLY CHAINS

HKS is a global architecture and design firm headquartered in Dallas, Texas, with UK operations based in London. We provide professional services in architecture, planning, interior design, structural engineering, and consultancy across public and private sectors including health, education, hospitality, sports, and commercial developments.

Our supply chains include:

- Professional service providers such as consultants, engineers, and specialist designers.
- Suppliers of IT, technology, and office resources
- Contractors and subconsultants engaged on specific projects

We recognise that our operations and supply chains span multiple jurisdictions and may include regions where the risk of modern slavery is more prevalent. We are therefore committed to ongoing supply chain transparency and ethical procurement practices.

STEP 2: POLICIES IN RELATION TO MODERN SLAVERY AND HUMAN RIGHTS

Our zero-tolerance approach to modern slavery is supported by a robust framework of company policies and standards, including:

- Anti-Bribery and Corruption Policy – ensuring integrity in all business conduct
- Equal Opportunities and Diversity Policy – promoting fairness, respect, and inclusion
- Environmental and Quality Policy Statements – embedding sustainability and ethical accountability
- Social Equity Framework – reinforcing dignity and equitable treatment
- Whistleblowing and Grievance Procedures – ensuring safe and confidential reporting channels

These policies are reviewed annually by the Senior Management Team (SMT) as part of our certified ISO 9001 and ISO 14001 management systems.

STEP 3: DUE DILIGENCE AND RISK MANAGEMENT

We are committed to identifying and mitigating risks of modern slavery through rigorous due diligence procedures. Our approach includes:

- Conducting pre-qualification checks on suppliers and subconsultants to confirm compliance with the Modern Slavery Act
- Including anti-slavery and ethical labor clauses in contracts and procurement documentation.
- Evaluating high-risk suppliers and regions based on activity, geography, and industry sector.
- Maintaining a Compliance Register that records all relevant legislative requirements, interested parties, and performance reviews.
- Investigating and resolving any non-compliance through our Corrective Action Procedure.

Where concerns arise, we work collaboratively with suppliers to address issues or, where necessary, terminate contracts that do not meet our ethical standards.

STEP 4: TRAINING AND AWARENESS

We believe that education is fundamental to prevention. During 2025, we have:

- Delivered targeted training to employees involved in procurement, project management, and supplier engagement.
- Reinforced ethical conduct and modern slavery awareness through the HKS Learning On-Demand platform.
- Encouraged open dialogue and confidential reporting of ethical concerns through HR and senior leadership channels.

Our training ensures that all employees understand their role in identifying risks and upholding our company values.

STEP 5: MEASURING EFFECTIVENESS

To measure the impact of our efforts, HKS uses Key Performance Indicators (KPIs) and regular internal reviews. These include:

- Percentage of key suppliers completing modern slavery and ethics declarations.
- Number of staff trained in modern slavery awareness.
- Audit outcomes and corrective actions implemented under the Management System.
- Feedback from employees and suppliers on compliance and ethical practices.

Results are reported through the Management Review process and used to identify opportunities for continuous improvement.

STEP 6: FUTURE COMMITMENTS

In the coming year, HKS will:

- Expand supplier due diligence and ethical risk assessments.
- Develop enhanced training modules tailored to procurement and project delivery roles.
- Introduce a supplier self-assessment questionnaire focusing on human rights and labour standards.
- Publish progress updates as part of our Environmental, Social and Governance (ESG) reporting.

We remain committed to embedding respect for human rights and ethical labour across every level of our business and supply chain.

Signed on behalf of HKS Architects Limited



Gary Clark, Managing Director
October 2025