



# Commonwealth Modern Slavery Act Statement for Financial Year end 3 January 2025

SLR Consulting Australia Pty Ltd

30 June 2025

Revision: 0

## 1.0 Introduction

This statement is made pursuant to Section 13 of the Commonwealth Modern Slavery Act 2018 (the Act) and constitutes SLR Consulting Australia Pty Ltd (ACN 001 584 612) (SLR) modern slavery statement for the Reporting Period commencing 6 January 2024 and ending 3 January 2025 (Financial Year 2024).

It sets out the steps taken during the reporting period to assess the modern slavery risks and implement action to address the risk of slavery taking place in any part of SLR's business, including entities owned or controlled by SLR and supply chain.

## 2.0 SLR Organisation Structure, Operations and Supply Chains

SLR is an independent, environmental and strategic advisory consultancy with a reputation for providing high quality tailored services to our clients. SLR employs approximately 885 staff across 18 offices located in Australia.

SLR is part of the SLR group and wholly owned by the UK based SLR Management Limited (CN 06538090) with the ultimate holding company Solar Holdings Topco Limited (CN 14159105).

SLR's supply chain is generally limited to providers of niche engineering, advisory and consultancy services, contractors or subcontractors associated with such consultancy services (for example: drillers, services locators, laboratory testing). It also includes suppliers of office consumables, hygiene services, IT services and equipment, and other facilities management services. In addition, our external networks include industrial organisations and professional bodies.

Notwithstanding, SLR recognizes that modern slavery may occur; and SLR has in place processes to mitigate the risk of these practices occurring within both our business and our supply chain.

## 3.0 Risk of Modern Slavery Practice and Actions taken to Assess and Address These Risks

SLR is proud of the ethical standards it has developed over many years and believes that these standards are consistent with the underlying principles of the Act.

### Our employees

SLR adopts and operates a 'one team' culture that fosters and encourages openness whereby all individuals can feel safe to discuss their opinions, views and/or concerns without fear of reprisal, subsequent discrimination or disadvantage. We believe this approach supports and maintains a culture built on trust and openness under which the aiding, abetting, counselling of modern slavery should and would not be tolerated under any circumstances.

SLR maintains a formal whistleblowing and grievance mechanism that enables all employees to confidentially report concerns related to unethical conduct, including potential risks of modern slavery within SLR's operations or supply chain. This mechanism is supported by SLR's HR policies, SLR Global Anti-Bribery and Corruption Training and annual employee acknowledgement of the Code of Conduct and Ethics, which collectively reinforce our commitment to ethical behaviour and transparency. Reports can be made anonymously without fear of reprisal, and all disclosures are handled sensitively and in accordance with our Whistleblowing Policy. (See [Section 4](#) for Policy details).



To mitigate the risk of modern slavery in and around the workplace, SLR offers a range of online courses available for all SLR employees in our learning and development portal, topics include modern slavery, human rights, and fair supply chains.

### **Our supply chain**

As a provider of professional consultancy services, SLR does not have a particularly long or complex supply chain, as described in Section 2 above. We have analysed our supply chain and divided it into two sectors:

- i. engineering, advisory, and consulting services; and
- ii. corporate supply chain.

SLR recognises that modern slavery risks can exist in indirect and less visible parts of our supply chain, particularly through subcontracted or specialist services. While much of our supply chain is based in Australia and consists of lower-risk categories (such as engineering, advisory, and consulting services) we acknowledge there the potential for modern slavery risk exists.

Our approach is therefore focused on strengthening our visibility and oversight of potential risk areas, including through improved screening of suppliers, particularly when niche or international providers are engaged. All contractors and consultancy service suppliers are subject to evaluation and approval processes that incorporate modern slavery risk considerations. ([See Section 4](#)).

There is a higher risk of modern slavery within certain segments of SLR's corporate supply chain. In particular, facilities management services, commercial cleaning and maintenance - especially where services are outsourced to third party providers or agency workers are employed. Facilities management services are procured by SLR or through building property managers. When directly engaged by SLR, suppliers are subject to evaluation and assessment prior to any approval and engagement. ([See Section 4](#)). When provided by building property managers, they have comprehensive processes and policies, including provisions to mitigate modern slavery risks.

Purchase of office supplies, personnel protective equipment, or food and beverage may carry risks prevalent in global commodity supply chains. These risks are especially pronounced in the production and supply of uniforms, electronics, paper products, and low-cost consumables, where the risk of modern slavery may be heightened in upstream manufacturing or raw material sourcing in certain geographies.

Purchase of office supplies, uniforms, personnel protective equipment, or food and beverage are procured by SLR usually via large suppliers with comprehensive processes and policies, including provisions to mitigate modern slavery risk. Most of our suppliers are based in Australia and required to comply with SLR's Supplier Code of Conduct, and to ensure that this is shared and followed both internally and externally to their supply chains and those assigned to perform services or supply goods or materials to SLR.

SLR will only engage with suppliers that display commitment to operate in a manner which is aligned with SLR corporate governance policies. These evaluations are carried out before engagement, at renewal of contract or periodically as required.

This expectation also extends to our external networks, ensuring that the industry organisations and professional bodies SLR collaborates with are aligned with our ethical standards, values, and commitment to responsible business practices.

### **Our services**

One of SLR key areas of business is the provision of specialist environmental, advisory, and sustainability services that help clients identify, assess, and manage a wide range of human rights and environmental risks, including those related to modern slavery. Through our



technical expertise and strategic guidance, we support clients in strengthening their due diligence processes, improving supply chain transparency, and embedding ethical practices across their operations. Due to the nature of our work, SLR is occasionally exposed to sectors, geographies, and operational contexts where modern slavery risks are elevated.

These include:

- **High-risk sectors** such as mining, construction, shipping and waste management;
- **Fieldwork in remote locations**, where labour protections may be weak or inconsistently enforced; and
- **Engagement with supply chains** that may involve informal labour, migrant workers, or subcontracted services with limited oversight.

In delivering our services, SLR staff may encounter or observe vulnerable workers or indicators of modern slavery. We regularly review and refine our procedures to so that they remain effective in identifying and mitigating modern slavery risks while also building on our experience to improve how we detect, report, and respond to potential modern slavery risks.

## 4.0 Relevant Policies

To address the risk of modern slavery, SLR has an established Global Code of Conduct and Ethics policy (which applies to all employees, contractors and business partners) as well as a robust procurement process for the engagement of such suppliers (Supplier Approval Procedures). The Supplier Approval Procedures are described below, together with other SLR policies.

The accountability, oversight, responsibility for implementing and monitoring our modern slavery risk management practices is embedded across leadership, people team, as well as legal and compliance functions. This structure promotes the implementation and effectiveness of our policies.

SLR has developed a suite of policies which sets out how our activities are undertaken to deliver on our commitment to operate in a manner which is ethical and equitable to all our stakeholders, including ensuring compliance with the law.

These include the following:

- **Supplier Approval Procedures** – all potential suppliers are required to complete questionnaires and provide documentation before being included on SLR's approved suppliers list. These questionnaires incorporate a requirement for all suppliers to comply with the Act, any bribery laws, the supplier own policies and SLR's Suppliers Code of Conduct, Business Conduct Policy, Global Human Rights Policies, Global Health and Safety Policy, Global Diversity, Equity & Inclusion Policy. Where appropriate, copies of policies are sought from suppliers so they can be reviewed for compliance with SLR's requirements.
- **Supplier Code of Conduct**: In November 2024, SLR launched a standalone Supplier Code of Conduct. This Supplier Code of Conduct sets out the minimum requirements we expect to be followed by our suppliers, their workforce and any extended supply chain when performing services for or providing services/goods/materials to SLR. SLR's Supplier Code of Conduct outlines clear expectations regarding the protection of human rights and the prevention of modern slavery across our supply chain. The Supplier Code of Conduct has been formally reviewed and signed off by the CEO.
- **Global Code of Conduct and Ethics** – it outlines expectations for ethical behaviour, legal compliance, and responsible business practices, including adherence to anti-bribery and corruption laws as well as sustainability and human rights standards.



SLR requires all directors, officers, employees, consultants and individual contractors, interns, agents, joint venture and business partners to complete relevant training and disclosure of any actual or potential conflicts of interest. Suppliers are expected to align with SLR's standards, including its Human Rights Policy. SLR may request supporting documentation or policies from suppliers to ensure alignment. Whistleblowing mechanisms are in place to report violations confidentially, and retaliation against whistleblowers is strictly prohibited.

- **Human Rights Policy** – commits the SLR group to conducting business at all times in a manner which treats individuals with respect and dignity; complies with the United Nations Declaration on Human Rights and with relevant slavery legislation in the countries where it operates; and is ethical and is equitable to all of our employees and other interested parties, including all parts of our supply chain. It also commits the SLR group to take steps to ensure all our supply chain members can demonstrate a commitment to operating in accordance with the principles of this policy.
- **Business Conduct Policy** – Adoption and acceptance of this policy is mandatory for all SLR group staff. The policy states that SLR group will not engage in business with any contractors/sub-contractors, sub-consultants, suppliers or agents who are not able to demonstrate a similar commitment to that of SLR group in operating in a fair, honest and equitable manner.
- **HR Policy and Employee Code of Conduct** – makes clear to employees the high standards of conduct and ethical behaviour expected of them when representing SLR group.
- **Whistleblowing Policy** – encourages all SLR group staff to report any concerns related to the direct activities of the organisation or of our supply chain. This includes any circumstances that may give rise to any unethical practices or behaviours, including enhanced risk of slavery or human trafficking. SLR's whistleblowing procedure is designed to make it easy for workers to make disclosures, confidentially and without fear of reprisal. Following the launch of our externally hosted whistleblowing hotline in May 2025, we have now revised our Whistleblowing Policy to include reference to Safecall (the hotline).
- **HR Policy and Recruitment** – SLR group either recruits individuals directly or uses a list of pre-approved agencies with whom it has a written contract, and who share SLR group's professional and ethical approach to recruitment. SLR group seeks to verify the practices of each of these agencies before a contract is agreed whether it is of a permanent or temporary nature.

All policies and procedures of SLR are regularly assessed at least annually and periodically updated against best practice.

## 5.0 Due Diligence and Managing Risk

SLR manages the potential ongoing risk through appropriate core business processes including project management and procurement processes which are embedded into our Quality Management System which is externally certified to ISO9001:2015.

All procurement must be from approved suppliers and supplier performance is regularly monitored and audited if necessary. SLR does not wish to be associated with any organisation that either has or is found to be in breach of modern slavery laws. If we were to find evidence that one of our suppliers had failed to comply with the Act, we would require the relevant supplier to remedy such non-compliance and would terminate our relationship should we see no substantial improvement in the way their business was conducted.



## 6.0 Assessment of the Effectiveness

SLR will remain focused on addressing the risks of modern slavery within our supply chain and will continue to work on improvements to the Supplier Approval Procedures and additional screening process, if required.

All policies and procedures of SLR (including but not limited to the Supplier Approval Procedures) are regularly reviewed (i.e., at least annually) and periodically updated to reflect changes in legislation and optimal practice.

SLR is also subject to external audit processes which includes checking SLR compliance with its policies and procedures which in turn includes implementation of the Supplier Approval Procedures.

SLR considers our existing due diligence and other processes to be sufficient and appropriate to manage this level of risk modern slavery risk. Should circumstances arise which we consider may be particularly high risk, appropriate training will be developed and targeted at relevant staff members.

The above approach will be reviewed periodically by senior management.

## 7.0 Consultation with the Entities Owned or Controlled by SLR

In preparing this statement, we checked our internal processes applicable to the relevant entities owned or controlled by SLR. SLR's wholly owned subsidiary companies are listed in Annexure A.

## 8.0 Ongoing Commitment

SLR recognises that addressing modern slavery is an ongoing responsibility that requires continuous learning, vigilance, and adaptation. As we move forward, SLR is committed to strengthening our approach through the following actions:

- Ongoing monitoring and learning: We will continue to monitor modern slavery risks across our operations and supply chain, incorporating insights and observations from our professional delivery teams, particularly those working in high-risk sectors and locations;
- Governance and policy review: Our modern slavery statement and supporting policies will be reviewed regularly for effectiveness, relevance, improvement, and alignment with evolving practices and legal requirements;
- Employee training and awareness: Training for employees particularly those involved in procurement, fieldwork, and client engagement to be monitored and improved if required to further improve awareness of modern slavery; and
- Stakeholder engagement: We will continue to engage with new or existing suppliers, contractors and subcontractors, clients and others within our supply chain as part of our Global Code of Conduct and Ethics, and our Supplier Code of Conduct and promote shared responsibility in mitigating modern slavery risks.



## 9.0 Statement of Approval

This statement was approved by the principal governing body of SLR Consulting Australia Pty Ltd on 21 August 2025.



**Paul Gardiner**  
APAC Regional Managing Director



# Annexure A SLR Consulting Australia wholly owned subsidiaries

Company Name	ACN	Status
NMP Technical Pty Ltd	613 099 540	Non-trading
KDC Pty Ltd	148 085 492	Non-trading
360 Environmental Pty Ltd	109 499 041	Trading
Australian Limnological Services Pty Ltd	145 831 554	Non-trading
FRC Environmental Pty Ltd	002 895 007	Trading
Groundwork Plus Pty Ltd	609 422 791	Trading
Groundwork Plus (SA) Pty Ltd	642 089 683	Trading
Groundwork Holdings Pty Ltd	636 259 035	Trading
Alchemy Growth Partners Pty Ltd	114 290 407	Trading
Astrebla Pty Ltd	651 050 369	Non-trading
Cumberland Ecology Pty Ltd	106 144 647	Trading
Element Advisory Pty Ltd	097 273 222	Trading

