



Modern Slavery Statement

2020 Financial Reporting Year

29 June 2021



**Norman
Disney &
Young**
A TETRA TECH COMPANY

ABOUT THIS STATEMENT	1
STATEMENT APPROVAL	1
INTRODUCTION	2
OUR PURPOSE	2
OUR ORGANISATION	3
NORMAN DISNEY AND YOUNG	3
STRUCTURE	3
OPERATIONS	3
OUR WORKFORCE	3
OUR SUPPLY CHAIN	3
RISK ASSESSMENT	4
NDY SUPPLY CHAIN SCREENING RESULTS BASED ON FY 2020 SPEND	4
OUR SUPPLY CHAIN	4
SUPPLY CHAIN MAPPING	4
OUR ACTIONS	6
WITHIN OUR BUSINESS	6
SUPPLIER ENGAGEMENT	6
ASSESSING EFFECTIVENESS	8
ONGOING PROCESS OF REVIEW	8
CONSULTATION PROCESS	8
APPENDIX A: HOW WE'VE ADDRESSED UK AND AUSTRALIAN MODERN SLAVERY LEGISLATION	9



ABOUT THIS STATEMENT

This Modern Slavery Statement (“Statement”) has been prepared and approved by Norman Disney & Young (“NDY Group”, “we”) on behalf of the reporting entities: Tetra Tech Holdings Pty Ltd, NDY Holdings Pty Ltd, NDY Management Canada Inc and NDY Consulting Ltd (UK).

This Statement covers the financial year ending September 2020, aligned with NDY Group’s ultimate parent company Tetra Tech Inc. financial reporting year.

STATEMENT APPROVAL

This Statement for financial year 2020 is made pursuant to section 14 of the Australian Modern Slavery Act 2018 (Cth), and section 54 of the Modern Slavery Act 2015 (UK) respectively, and constitutes Norman Disney & Young’s Modern Slavery Statement. Alignment of this statement with UK and Australian Modern Slavery Legislation is summarised in Appendix A.

The Statement has been approved by the board of Tetra Tech Holdings Pty Ltd on 28 June 2021, on behalf of the joined reporting entities who intend to review and update it annually, as necessary.

Signed: 
Name: Stuart Fowler
Position: Chief Executive Officer
Date: 29 June 2021



INTRODUCTION

Norman Disney & Young has a proud tradition of upholding the highest ethical standards in the manner by which we conduct ourselves as a company, which is captured in our 6 values developed in 2011.

The ethical principles embodied in our values are the signposts by which our employees make business decisions each day. To help ensure that we conduct business according to these principles, we have specific policies and procedures in place that define what we expect of our people.

We strive to be ethically, environmentally and socially responsible in all we do.

We recognise the importance of tackling modern slavery within our society and our supply chain, as well as contributing to broader cross-sector industry awareness and encouraging meaningful action.

Our first Modern Slavery Statement captures our efforts to understand social risks within our supply chain and outlines our actions for minimising, managing and tracking modern slavery related risks as a result of our global operations.

Our Statement builds on our initial supply chain social screening assessment completed in 2018, which has been updated to reflect our 2020 financial year spend and suppliers. This assessment, coupled with joining Informed 365's Property Council of Australia Modern Slavery supplier platform, has underpinned our actions going forward to tackle modern slavery.

Our Purpose

Making spaces work

Our Vision

To enhance the lives of others, by engineering outstanding projects, mindful that every project matters.

To sustain deep and trusting relationships with our clients, through solving their problems and serving them with utmost reliability, and

To engage our people with meaningful, rewarding, and inspiring opportunities.

Our Values

- > Excellence: do it once, do it well
- > Leadership: lead in our profession, industry, and the community
- > Integrity: treat others as we wish to be treated
- > Collaboration: listen, share, and contribute
- > Accountability & Ownership: understand the impact of our actions and own the outcomes
- > Innovation: inspired creativity to challenge the norm



OUR ORGANISATION

Description of our structure, operations and supply chains

Norman Disney and Young

Established in 1959, Norman Disney & Young (NDY), A Tetra Tech Company is a global firm of consulting engineers. With offices in Australia, Canada, United Kingdom, New Zealand and Hong Kong, NDY is able to deliver innovative, sustainable and tailored solutions for a diverse group of clients. With over 60 years' experience as consulting engineers, NDY has grown its reputation for professional excellence and innovation in building services to a broader suite of client-focused offerings. Our longevity and growth as a leading consultancy is testament to our people and our reputation in the market.

The ultimate parent of the NDY Group is Tetra Tech Inc, a global engineering firm headquartered in California, U.S.A.

For the purposes of this Statement, Tetra Tech Inc. is categorised as a supplier of services to the NDY Group, including in relation to IT infrastructure, licensing and management support.

Structure

NDY Group includes the following corporate entities:

- ▶ Tetra Tech Holdings Pty Ltd:
 - NDY Holdings Pty Ltd
 - › Norman Disney & Young Ltd
 - › NDY Hong Kong Ltd
 - › NDY ICS Pty Ltd
 - › NDY Management Pty Ltd
 - › Engineering and Commissioning Services Pty Ltd
 - › NDY International Pty Ltd
 - › Luminova International Pty Ltd
 - NDY Holdings (NZ) Ltd

In addition, NDY Group also has management responsibility for the following entities:

- ▶ NDY Management Canada Inc.
- ▶ NDY Consulting Ltd (UK)

Operations

NDY Group manages offices in the following locations:

- ▶ Australia:
 - Adelaide
 - Brisbane
 - Canberra
 - Melbourne
 - Perth
 - Sydney (Head Office)
- ▶ New Zealand:
 - Auckland
 - Wellington
- ▶ Hong Kong SAR
- ▶ United Kingdom:
 - London
- ▶ Canada:
 - Vancouver

Our Workforce

NDY Group has over 500 staff based across nominated offices.

Our global workforce comprises the following breakdown:

- ▶ Casual: 6%
- ▶ Fixed Term: 1%
- ▶ Permanent: 93%

'Casual' workers are non-permanent staff engaged on an as needs basis. Fixed Term employees are engaged for a defined term with a specified end date for project-related work. Permanent workers are engaged on a permanent basis and may be employed in a full time or part time capacity.



OUR SUPPLY CHAIN

A description of the NDY supply chain is provided below.

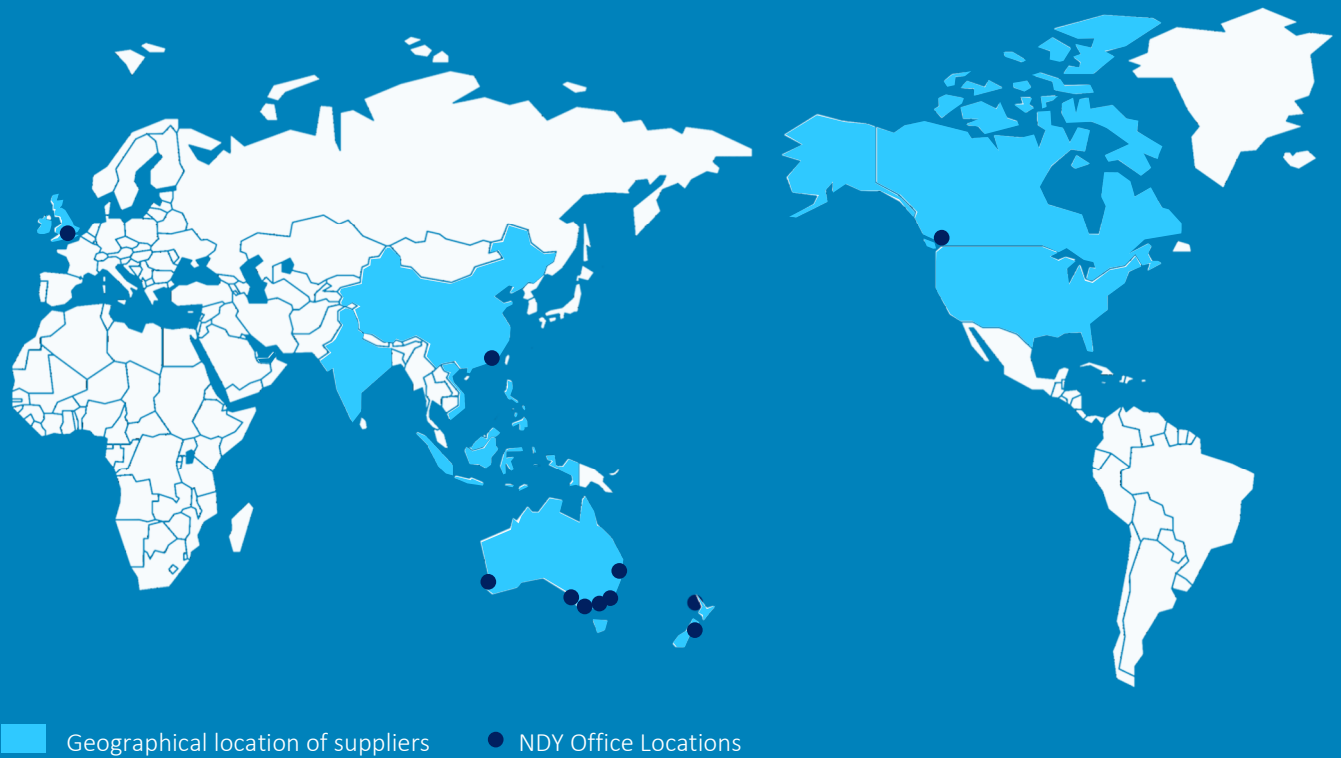
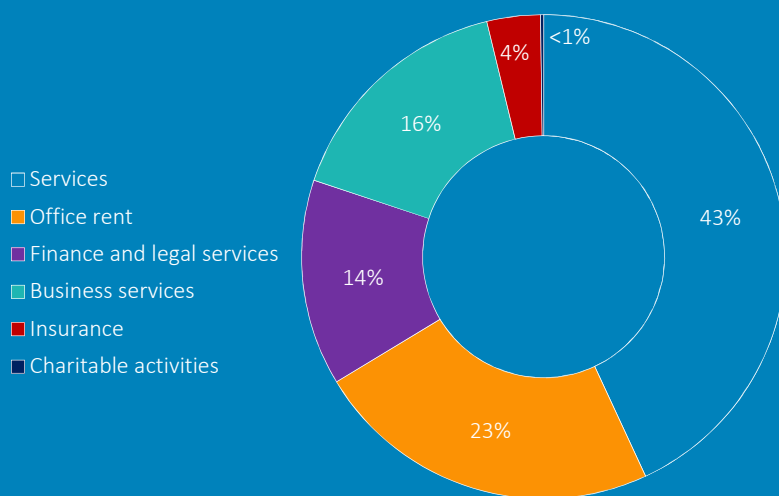


Figure 1: NDY Supply chain map by region, based on 2020 financial year spend



780 Tier 1 Suppliers
Globally

118 Suppliers
accounted for 90% of NDY
Annual Spend in FYR 2020

Figure 2: Categorisation of NDY 2020 financial year spend

RISK ASSESSMENT

Risk of modern slavery practice in NDY Group operations and supply chain within our control

Our Supply Chain

NDY Group suppliers include those of administrative labour and CAD design, as well as relevant local suppliers of facilities management services, transport such as airlines, legal and accounting firms, and insurance and recruitment agencies.

Supply Chain Mapping

NDY has taken a 2-step approach to mapping its supply chain and modern slavery risk:

1. Industry-based supply chain social screening, which includes risk categories identified under the Act.
2. Supplier Engagement Survey, utilising the Property Council of Australia’s Modern Slavery supplier platform, administered by Informed 365.

1. Industry-based Supply Chain Screening

An industry-based screening of social risks in our supply chain has been undertaken, which incorporates activities that constitute modern slavery. NDY has used an economic input-output model (Socially Extended Input-Output (SEIO) model) to estimate social risks in the supply chain. The input-output matrix evaluates the linkage between monetary flows – such as supply chain flows – and social risks. This allows an assessment of the whole supply chain, considering risks beyond the supply chain’s first tier (direct suppliers). This method uses two sets of general data:

- ▶ Monetary flows between sectors and countries
- ▶ Social risks specific to each sector/country

NDY supply chain screening results are shown to the right.

NDY Supply Chain Screening Results based on FY 2020 Spend

To help us properly survey and communicate with our suppliers we need to know the risk profile of the spend categories. These spend categories cover services procured from all over the world so it was important for us to understand the location-based risks within a category. NDY broke down total business spend into 13 categories. This information was paired with a social risks database to identify NDY’s social risk profile per spend. We then evaluated the location-based risks for the top 4 categories – services, business services, travel, and recruitment. This information allows us to target suppliers in those regions identified as hotspots for the business.

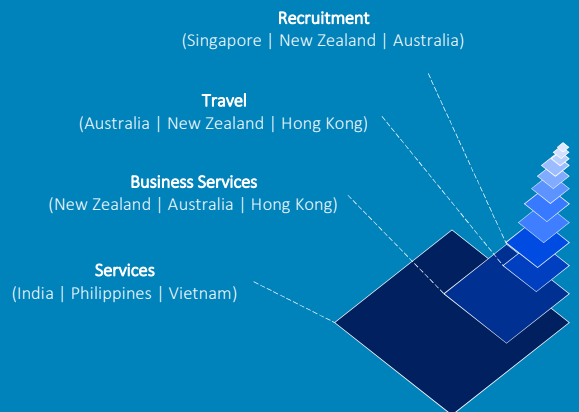


Figure 3: Risk intensity of NDY spend by supplier category

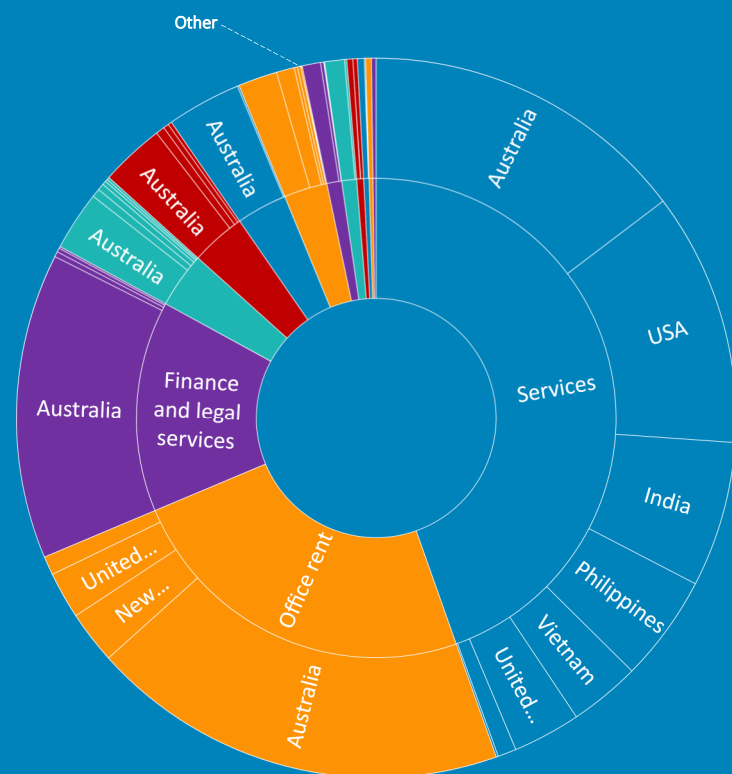


Figure 4: Regional distribution of supplier category by region, by proportion of annual spend



2. Supplier Engagement

NDY has begun engaging directly with our suppliers as a means to validate our social screening process, refine our understanding of broad social and modern slavery risks and develop actions to tackle risk in both their and our supply chains. We have utilised the Informed365 Modern Slavery Supplier Platform to underpin a more structured approach to supplier engagement.

In 2018 The Property Council of Australia (PCA) commissioned Informed365 to develop an industry-wide online supplier platform, in collaboration with industry partners, that allows PCA members to assess and report on modern slavery risks across their supply chains.

This platform was launched in October 2019 and the approach streamlines compliance requirements for property industry suppliers and facilitates consistency in reporting.

As consulting engineers working for some of Australia's largest property companies represented by the PCA, our participation in the Informed 365 Platform demonstrates our commitment to reducing supply chain risk within our professional community, not only in Australia but in all the regions we operate in and procure from.

At the end of March 2021, 23% of NDY Group suppliers had either completed or are currently progressing their questionnaire responses. Supplier survey platform and results currently indicate:

- ▶ 25% are required to report under the Act.
- ▶ 46% surveyed to date are not required to report under the Act.
- ▶ 32% have undertaken a modern slavery assessment of their supply chain operations.
- ▶ 33% use sub-contracting or third-party recruitment organisations (considered a high-risk supplier sector).
- ▶ 4% have opted to report voluntarily.
- ▶ None are currently considered high risk (level 4 or 5), based on the Informed365 supplier platform categorisation.

The supplier information received to date has helped inform the development of our anti-slavery action plan and future reporting.



OUR ACTIONS

Description of actions taken by NDY Group to assess and address modern slavery risks, including due diligence and remediation processes.

NDY Group has used the results of its supply chain screening activities, in conjunction with supplier survey feedback received to date, to set out tangible actions for assessing, managing and reducing modern slavery risks in our supply chain.

Our planned actions, which include internal and external initiatives, are described in this section and shall be progressed over the next 12 months, unless stipulated otherwise.

Within our Business

We shall communicate with our staff regarding modern slavery, its importance, our approach to it and the controls we have developed. We intend to communicate:

- ▶ Our supplier screening methodologies
- ▶ Our modern slavery policy
- ▶ Our supplier code of conduct
- ▶ Our standard supplier contracts.

Our Statement shall be displayed and available to download from our website, contained within a dedicated page on our website.

Awareness and Training

We intend to coordinate, prepare and/or deliver training to all staff. The training shall comprise 3 parts:

1. Awareness. *‘What is modern slavery, where might it exist in our workplace and our business sector supply chain?’* We intend to utilise NDY’s pre-prepared modern slavery act module, supported by third party providers including: the Supply Chain Sustainability School, Anti-Slavery Australia, the UK Border Force, all of whom provide free dedicated Modern Slavery training.

2. Acknowledgement. NDY staff shall be required to read and acknowledge our Statement.
3. NDY Approach and Operational Controls: The training shall outline the controls and processes NDY has put in place to minimise the risk of modern slavery in our work. This third component shall be delivered for a selection of staff across the business where procurement, financial management or executive decision-making forms part of their core duties.

This training shall be run annually for relevant staff with training records retained.

Our Statement shall be included in new staff induction packs, as part our employee onboarding process.

Supplier Engagement

Screening

We intend to continue screening our suppliers, understand their approach to the identification and control of modern slavery risks within their workplace and supply chain.

We intend to screen our proposed and current suppliers at the following intervals:

- ▶ Screening of all currently listed suppliers within our Informed 365 platform within 6 months.
- ▶ New suppliers to be surveyed/screened prior to their initial engagement.
- ▶ Existing high-risk suppliers to be re-surveyed/screened annually.
- ▶ Based on the risk and exposure that each supplier represents, low-risk suppliers may be screened bi-annually.

Management Approval – Medium and High-Risk Suppliers

Medium and high-risk suppliers shall require manager approval prior to engagement.



We shall re-assess suppliers who pose a high risk or high potential exposure to modern slavery to:

- ▶ Determine if their service is critical to our supply chain and whether an alternate and lower risk supplier may be engaged.
- ▶ Support them in modifying their exposure and/or control measures to reduce their level of risk.
- ▶ Monitor their performance to ensure risks are appropriately controlled.

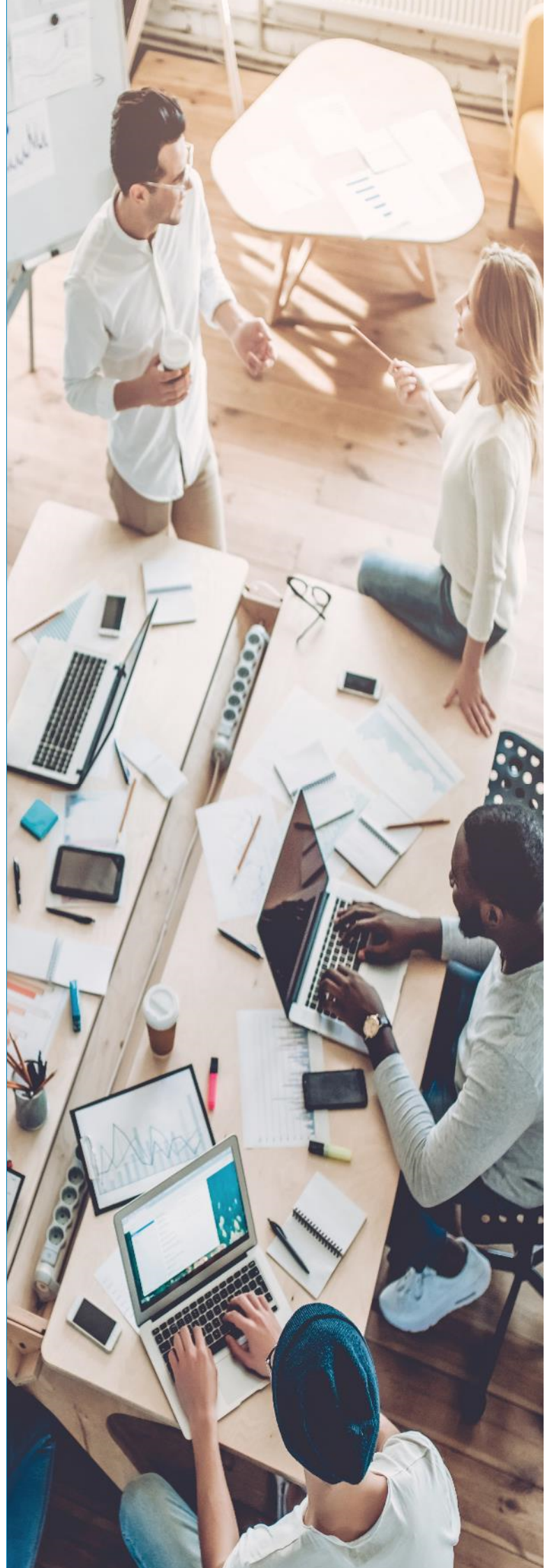
For critical, high-risk suppliers, we shall work with these suppliers to minimise the risk of modern slavery in their work and offer workshops to educate their staff regarding modern slavery, it's risk in their business and supply chain and how to control it.

Procurement

Our procurement procedures shall include the following:

- ▶ Screening of all suppliers for their compliance with the Act, utilising our modern slavery supplier platform administered by Informed 365.
- ▶ Periodic reassessment of suppliers to monitor for the effectiveness of our system and approach.
- ▶ A requirement for our suppliers to commit to abiding by our supplier code of conduct.
- ▶ Offer commercial terms that include specific reference to obligations in respect to the Modern Slavery Act. Where these terms cannot be agreed, as a minimum, the supplier must be screened and commit to our supplier code of conduct.
- ▶ Pre-screening process for potential new suppliers.
- ▶ Workshops with major suppliers, identified based on results from the initial 118 supplier surveys in the first instance.

These procedures shall also be incorporated into NDY's existing integrated management framework – Safety, Health, Environment and Quality (SHEQ) – as required.



ASSESSING EFFECTIVENESS

Description of how NDY Group will assess the effectiveness of our planned actions, which includes the process of consultation with entities under our management control.

Ongoing process of review

We shall continue to work with and screen our suppliers for modern slavery risks. Our process shall include the analysis of the modern slavery questionnaire results year-on-year to identify patterns, emergent risks and priorities for further due diligence.

We shall evaluate the questionnaire responses for the suppliers assigned a high-risk in order to determine root causes. Where their involvement on a project is necessary, we shall work with them to educate them and their staff about the risk of modern slavery and in the identification and implementation of suitable controls to minimise the exposure risk.

We shall seek to assess the effectiveness of our actions by tracking the following metrics:

- ▶ Number and percentage of our staff who have attended the required awareness and procedure-based training.
- ▶ Number and percentage of suppliers who have been screened.

- ▶ Number and percentage of suppliers who have accepted our code of conduct or implemented their own similar terms.
- ▶ Outcomes of the screening process and the number and percentage of suppliers determined as being low, medium or high risk.
- ▶ Results of audits conducted on suppliers.
- ▶ Results of internal audits conducted to check for our own compliance with requirements.
- ▶ Changes in MSQ responses and summary data over time for suppliers or supplier types.
- ▶ Whistle-blower reports/complaints relating to modern slavery risks or potential breaches of our policy of supplier code of conduct.
- ▶ Investigations and outcomes of investigations of potential or reported breaches.

Modern slavery risk shall be incorporated into our existing NDY Environment and Social Governance (ESG) committee agenda, convened on a quarterly basis. Review of metrics shall be undertaken by the committee and a summary issued to NDY Group Executive Committee on a periodic basis, containing any required actions.

Consultation process

We have consulted with and received input from other entities for which NDY Group has management responsibility, including: NDY Management Canada Inc. and NDY Consulting Ltd (UK). Their input is included and consolidated as within this Statement.



APPENDIX A: HOW WE'VE ADDRESSED UK AND AUSTRALIAN MODERN SLAVERY LEGISLATION

Australian Modern Slavery Act mandatory reporting criterion	UK Modern Slavery Act recommended reporting criterion	Statement Reference	How this Statement addresses Legislative Criterion
Identify the reporting entity.	Organisation's structure, its business and its supply chains.	Our organisation	<ul style="list-style-type: none"> ▶ Relevant reporting entity including subsidiaries subject to the UK and Australian legislation ▶ Corporate structure ▶ Screening of NDY's global supply chain
Describe the reporting entity's structure, operations and supply chains.	As above.	Our organisation Our supply chain	<ul style="list-style-type: none"> ▶ As above
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk	Risk assessment	<ul style="list-style-type: none"> ▶ Industry-based supply chain screening to understand the risk profile of goods and services procured by NDY from all over the world ▶ Supplier engagement using Informed365 Modern Slavery Supplier platform
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Organisation's policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains; the training about slavery and human trafficking available to its staff	Our actions	<ul style="list-style-type: none"> ▶ Communicating to staff within our business ▶ Improving awareness and providing training ▶ Outlining the process for engaging with suppliers, and understanding red flags for modern slavery risks ▶ Steps we take for medium and high risk suppliers
Describe how the reporting entity assesses the effectiveness of such actions.	Organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	Assessing effectiveness	<ul style="list-style-type: none"> ▶ Internal assurance and tracking implementation of our policy and procurement procedures ▶ Business conformance audits and group and function level strategic reviews
Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement.	Not applicable	Assessing effectiveness	<ul style="list-style-type: none"> ▶ Identification of Australian reporting entities ▶ Identification of UK reporting entities and a review of current consultation processes with those entities and others that we own or control.



<p>Include any other information that the reporting entity, or the entity giving the statement, considers relevant.</p>	<p>Not applicable</p>	<p>N/A</p>	<ul style="list-style-type: none"> ▶ Multi-stakeholder collaboration ▶ Support for policy and legislative developments
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