



**TETRA TECH**  
COFFEY

## **Modern Slavery Statement**

28 March 2024



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## ABOUT THIS STATEMENT

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The Modern Slavery Act 2018 (Cth) (the Act) requires entities with an annual consolidated revenue of over a \$100 million that are either classed as an Australian entity or a foreign entity carrying out business in Australia during the reporting period, to prepare and publish an annual Modern Slavery Statement (Statement).

This Statement has been prepared pursuant to Section 14 of the Act, by Tetra Tech Coffey Holding Pty Limited (Tetra Tech Coffey, we, us) on behalf of the reporting the following reporting entities:

- ▶ Coffey Australia Holdings Pty Ltd
- ▶ Coffey Corporate Pty Ltd
- ▶ Coffey Environments Australia Pty Ltd
- ▶ Coffey Environments Pty Ltd
- ▶ Coffey Geotechnics Pty Ltd
- ▶ Coffey International Pty Limited
- ▶ Coffey Mining Pty Ltd
- ▶ Coffey Natural Systems Pty Ltd
- ▶ Coffey Projects (Australia) Pty Ltd
- ▶ Coffey Services No 2 Pty Ltd
- ▶ Eco Logical Australia Pty Ltd
- ▶ Macsis Pty Ltd
- ▶ Proteus Engineers Pty Ltd
- ▶ Tetra Tech Australia Holding Pty Ltd
- ▶ Tetra Tech Coffey Pty Ltd
- ▶ Tetra Tech International Development Pty Ltd

This Statement covers the financial year ending September 2023 and sets out the process taken by Tetra Tech Coffey to identify, assess and address the risks of modern slavery in our operations and supply chains.

## STATEMENT APPROVAL

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This Statement for financial year 2023 is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) and constitutes Tetra Tech Coffey Holdings' Modern Slavery Statement.

The Statement was approved by the board of Tetra Tech Coffey Holding Pty Ltd, on behalf of the listed reporting entities on 28 March 2024. This statement be reviewed and updated it as necessary, annually.



Brigid Moriarty

Director – Tetra Tech Coffey Holding Pty Ltd

## INTRODUCTION

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Tetra Tech Coffey Holding Pty Limited (Tetra Tech Coffey Holding) is a wholly owned subsidiary of Tetra Tech, Inc., a NASDAQ-listed company with a global workforce of 28,000 staff working across over 100 countries.

Tetra Tech Coffey Holding provides consulting services in the areas of engineering, geotechnical, environmental, hazardous materials, hygiene, digital and international development.

Tetra Tech Coffey Holding's international development business (Tetra Tech International Development Pty Ltd (Tetra Tech International Development)) provides substantially different services to the rest of the businesses of Tetra Tech Coffey Holding and it has a separate management team and structure which reports directly to Tetra Tech, Inc.

Accordingly, Tetra Tech International Development is submitting its own Modern Slavery Statement. This Modern Slavery Statement does not address Tetra Tech International Development's business unless expressly stated.

The statement has been provided on behalf of Tetra Tech Coffey Holding Pty Limited. Where reference is made to Tetra Tech Coffey Holding, this reference includes all of the listed Tetra Tech entities including Tetra Tech International Development. Where reference is made to Tetra Tech Coffey, this reference excludes Tetra Tech International Development.

It is the policy of Tetra Tech Coffey to proactively identify and manage the environmental, social and economic impacts within our supply chain, and as identified by our key stakeholders and our business.

Tetra Tech Coffey is committed to:

- ▶ Setting objectives and action plans in support of this statement and pursuing improvement of our practices.
- ▶ Prioritising business with suppliers who have embedded sustainable and ethical practices within their organisation and who drive such practices within their own supply chain.
- ▶ Complying with applicable legislation.

This statement will be circulated throughout Tetra Tech Coffey and is available for public review. It will be reviewed on a regular basis to evaluate relevance, monitor compliance and drive improvement.

## OUR ORGANISATION

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### TETRA TECH COFFEY HOLDING

Established in Australia in 1959, Tetra Tech Coffey Holding is a trusted expert in the provision of engineering, geotechnical, environmental, hazardous materials, hygiene, and digital services.

The core areas of expertise for Tetra Tech Coffey Holding include:

- ▶ **Infrastructure:** We support the development of modern and efficient infrastructure across Australia and New Zealand. Our teams of geotechnical, environmental, civil, and structural professionals work with clients across all stages of their project life cycle.
- ▶ **Mining:** We provide a wide range of technical services to clients in the mining industry.
- ▶ **Defence:** We deliver specialist consulting services to the Australian Defence Force. Our expert teams of environmental scientists, engineers and planners have worked in this space for more than 30 years.
- ▶ **Geotechnical:** We provide ground engineering services including site investigation, geotechnical interpretation, analysis and design, and construction advice for a range of projects, clients and environments.
- ▶ **Environments:** We provide specialist environmental, social and safety performance solutions. Our services include feasibility studies, approval management and stakeholder engagement through to environmental management, occupational health and safety, and waste management. We specialise in contaminated site assessment and remediation.
- ▶ **Digital:** We use the latest tools and technology to provide clients with the data intelligence and geospatial solutions they need to make more informed decisions about constraints, priorities, and risks on projects.

- ▶ **Renewable Energy and Climate Change:** We provide consulting and advisory services to companies, institutions, and governments with expertise across geothermal, hydropower, solar, and wind projects.
- ▶ **Eco Logical Australia:** Eco Logical Australia provides multi-disciplinary environmental consultancy services across a range of specialist areas, including, ecology, restoration ecology, restoration and land rehabilitation aquatic ecology, archaeology and heritage, GIS, bushfire, natural resource management, and water.
- ▶ **International Development:** We support clients across several development markets, providing practical and sustainable services, focused on empowering local communities, and leveraging private investment to create a safer, more prosperous world.

This statement has been provided on behalf of the listed reporting entities of Tetra Tech Coffey Holding Pty Limited, with the exception of Tetra Tech International Development which has prepared its own Modern Slavery Statement.

## OUR STRUCTURE

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Tetra Tech Coffey Holding, headquartered in Australia, has management control over the following legal entities:

- ▶ Coffey Australia Holdings Pty Ltd
- ▶ Coffey Corporate Pty Ltd
- ▶ Coffey Environments Australia Pty Ltd
- ▶ Coffey Environments Pty Ltd
- ▶ Coffey International Pty Limited
- ▶ Coffey Geotechnics Pty Ltd
- ▶ Coffey Mining Pty Ltd
- ▶ Coffey Natural Systems Pty Ltd
- ▶ Coffey Projects (Australia) Pty Ltd
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- ▶ Eco Logical Australia Pty Ltd
- ▶ Macsis Pty Ltd
- ▶ Proteus Engineers Pty Ltd
- ▶ Tetra Tech Australia Holding Pty Ltd
- ▶ Tetra Tech Coffey Pty Ltd
- ▶ Tetra Tech International Development Pty Ltd

## OUR OPERATIONS

Tetra Tech Coffey has offices in the following locations:

- ▶ Australia:
  - Adelaide, SA
  - Armidale, NSW
  - Austinmer, NSW
  - Brisbane, QLD
  - Canberra, ACT
  - Chatswood (Head office), NSW
  - Coffs Harbour, NSW
  - Darwin, NT
  - Geelong, VIC
  - Huskisson, NSW
  - Ingleburn, NSW
  - Melbourne, VIC
  - Mudgee, NSW
  - Narooma, NSW
  - Newcastle, NSW
  - Perth, WA
  - Sutherland, NSW
  - Sydney, NSW

- ▶ New Zealand:
  - Auckland
  - Christchurch
  - Hamilton
  - Rotorua
  - Tauranga
  - Wellington
- ▶ Papua New Guinea

Tetra Tech Coffey has approximately 750 staff based across the abovementioned office locations.

## OUR WORKFORCE

Tetra Tech Coffey's workforce comprises 63 casual, 103 part time and 580 permanent staff.

Most of our workers are qualified and/or experienced professionals in the fields in which we offer services. Our workforce also includes administrative and support staff who assist in the operation of our business.

## OUR SUPPLIERS

Tetra Tech Coffey's owned or controlled entities have common suppliers.

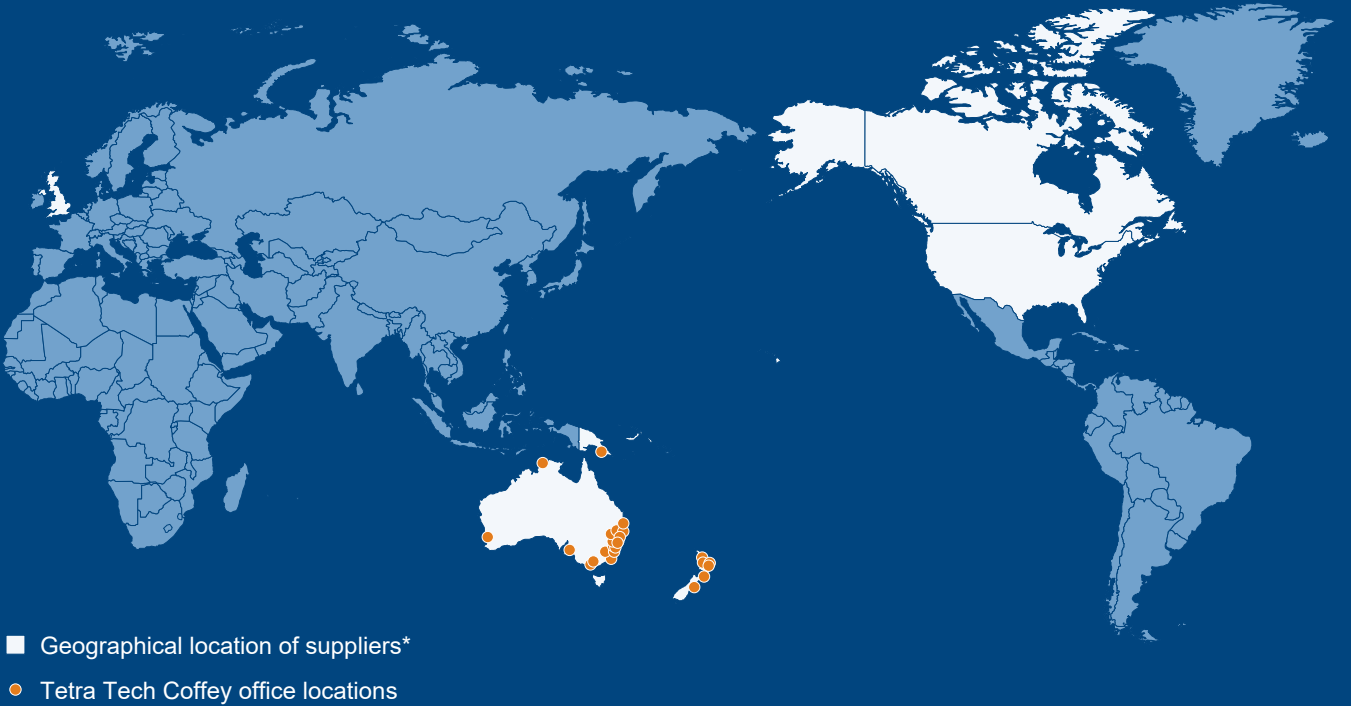
Tetra Tech Coffey's top ten supplier categories account for over 80% of our spend for the reporting period.

The majority of our supply chain is also located within Australia and New Zealand with relatively few suppliers located in other countries. The locations of our supply chain are also shown graphically in Figure 1.

Our top ten supplier types are represented in Figure 2 and include real estate, consulting services, drilling, Tetra Tech sister companies, finance services including tax and auditing, laboratory services, contracting, legal, recruitment, and equipment.

# OUR SUPPLY CHAIN

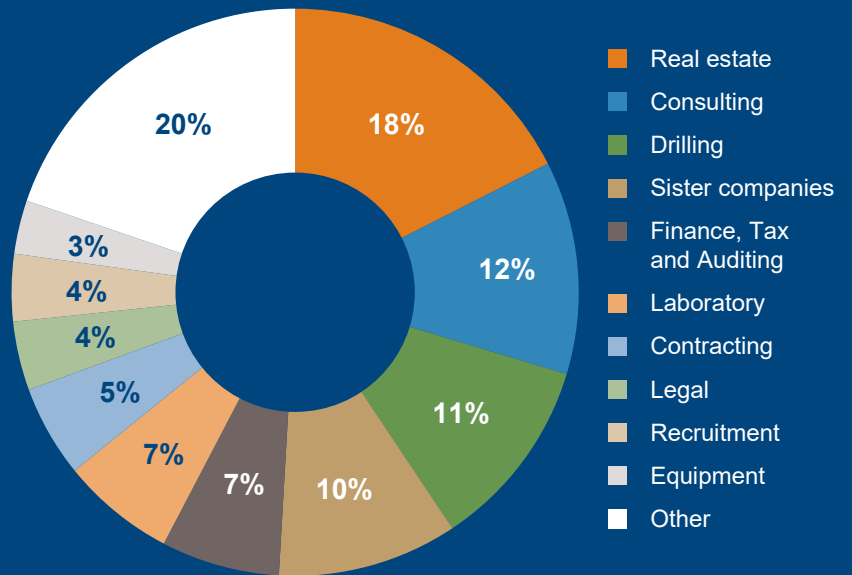
A description of the Tetra Tech Coffey supply chain is provided below.



**Figure 1:** Tetra Tech Coffey supply chain map by region, based on 2023 financial year spend.  
 \*Locations with minor or incidental supplier engagements (Hong Kong and Malaysia) have been excluded from this graphic.

## TETRA TECH COFFEY Top value supplier types

**TOP 10 SUPPLIER TYPES**  
 account for 80% of  
 Tetra Tech Coffey annual  
 spend in FYR 2023



**Figure 2:** Top ten supplier types for Tetra Tech Coffey 2023 financial year spend.



## RISK ASSESSMENT

### OPERATIONS

Tetra Tech Coffey employs approximately 750 staff across Australia, New Zealand and Papua New Guinea (PNG). Most of our employees are employed on a full-time basis (78%), with proportionally fewer part time and casual employees.

Most of our staff are professionals with university qualifications and/or industry experience. We also employ administrative staff to support our operations.

Most of our employees are employed in Australia or New Zealand with a small team in PNG. Work completed outside Australia, New Zealand or PNG is undertaken by our employees who are mobilised to those sites.

Staff are screened prior to employment for their right to work and age and appropriate qualifications for their role to ensure their suitability for employment.

Staff remuneration is based on industry standards and acquired benchmarking data for similar industry groups.

For these reasons, we consider that the combined operational modern slavery risk for Tetra Tech Coffey is low.

The impact of COVID-19 and the associated restrictions was reduced during the reporting period having less impact on our ability to secure and execute work. COVID-19 also appeared to have a less significant impact on the ability of our suppliers to deliver the service we require during the reporting period. We continued to support our staff through the current reporting period in relation to COVID-19. Our plans and actions were and remain in line with legislative changes, the changes to guidance provided by and the needs of government, health professionals, our clients and staff.

We have encouraged and allowed time for our staff to:

- ▶ Be vaccinated including booster shots where required.

- ▶ Attend vaccination centres for their vaccinations.
- ▶ Work remotely when required to support staff and reduce/mitigate risks of potential virus transmission in our workforce whilst maintaining productivity.

### SUPPLY CHAIN

Our suppliers have supply chains that may have risks of modern slavery over which we have limited visibility. Our screening of our supply chain has identified that the highest potential for exposure to modern slavery exists in:

- ▶ The manufacture and supply of uniforms and personal protective equipment.
- ▶ Cleaning services.
- ▶ IT – supply of hardware or software supply and support services.
- ▶ Traffic management.
- ▶ Labour hire providers, particularly in high risk jurisdictions;
- ▶ Hotels, restaurants and leisure.
- ▶ Road and rail transportation.
- ▶ Security.

Most of our suppliers are based in Australia and New Zealand, which are low risk jurisdictions for modern slavery. Where we conduct work outside those countries, we use the same controls for supplier prequalification.

We understand that our suppliers located in Australia and New Zealand may be supplying goods or services that originate from higher risk jurisdictions. To assist us to understand this, and other, less visible modern slavery risk factors in our supply chain, we issued modern slavery questionnaires (MSQ) via an on-line hosted survey platform. The survey was issued to our more significant suppliers that provided goods and/or services to us during the 2023 reporting year. This assisted us to understand the potential risk of modern slavery in our supply chain and we use this information to initiate discussions with higher risk suppliers.

MSQs were issued on behalf of Tetra Tech Coffey to a selection of our suppliers that provided service to our organisation during the 2022/23 financial

year. This supplier list was selected with reference to:

- ▶ Major suppliers by total spend.
- ▶ Suppliers we interacted with on repeated occasions (frequently used suppliers) but where the total spend was relatively low.
- ▶ Suppliers who conduct activities that are considered to represent a higher risk for potential exposure to modern slavery.

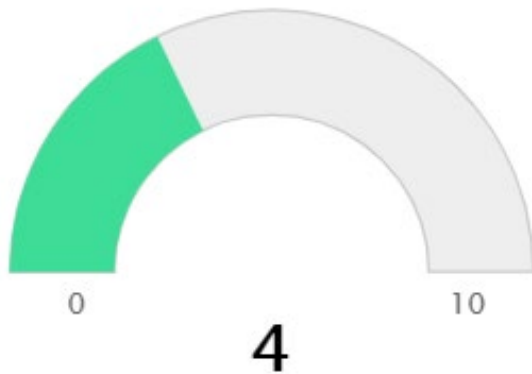
In undertaking the MSQ process, we adopted a risk-based approach in line with the United Nations Guiding Principles on Business and Human Rights.

## SUMMARY OF SUPPLY CHAIN SCREENING RESULTS

The top five countries where our suppliers have business operations are consistent with previous reporting periods and include:

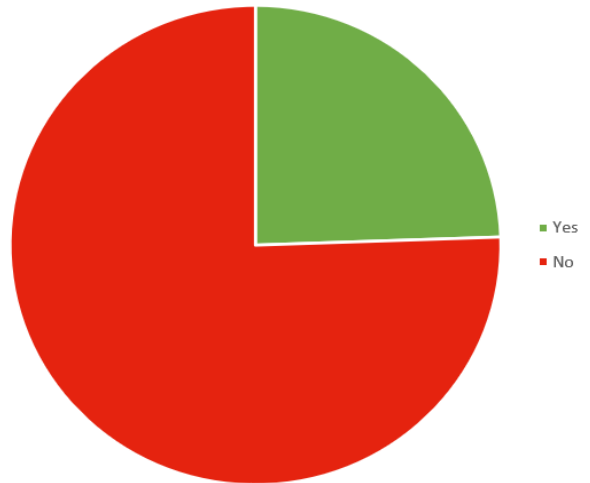
- ▶ Australia.
- ▶ New Zealand.
- ▶ Papa New Guinea.
- ▶ The United States of America.
- ▶ Canada.

Tetra Tech Coffey suppliers were sent a Modern Slavery Questionnaire. The average modern slavery risk rating based on the responses received during the reporting year was 4 out of 10 (refer Figure 3), resulting in an overall low risk average. This rating is consistent with previous years.



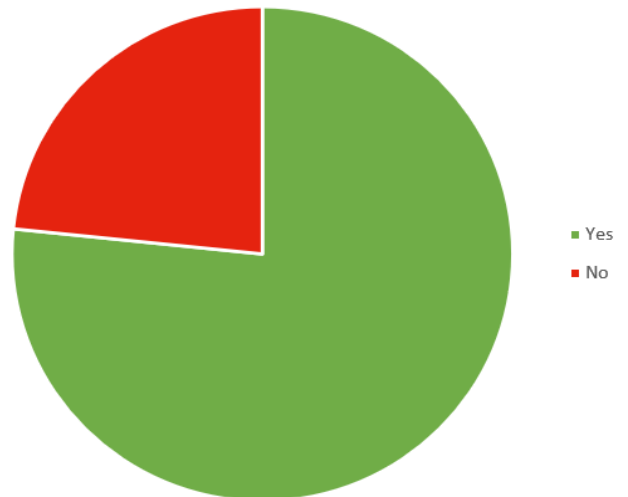
**Figure 3: Average supplier risk score**

A slightly lower proportion of suppliers have conducted a human rights impact assessment for their operations when compared to the 2021/2022 questionnaire responses. The proportion of suppliers that have undertaken a human rights impact assessment is shown in Figure 4.



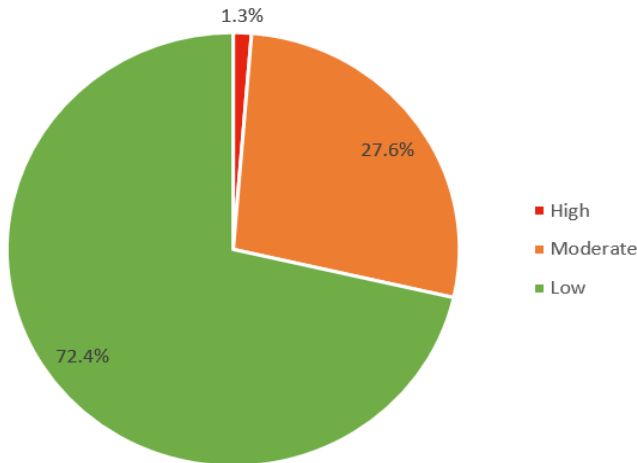
**Figure 4: Supplier human rights impact assessment completion**

Most of the suppliers who responded also confirmed that they have in place, and agree to maintain, adequate policies, controls, procedures and training designed to: prevent, detect, assess, manage and remedy modern slavery in their operations and supply chains. The proportion of suppliers that have confirmed that they have these processes in place is shown in Figure 5.



**Figure 5: Supplier policy, control and procedure implementation**

A breakdown of the risk ratings of those who completed the MSQ during the current reporting period is presented in Figure 6. The results were similar to those observed for the 2021/2022 reporting period.



**Figure 6: Supplier risk rating summary**

The MSQ process has brought to our attention the suppliers with whom we need to engage for further due diligence in our second reporting period.

## SUPPLIER ENGAGEMENT

We understand that each of our suppliers also have their own supply chains, which may expose us to modern slavery risk. Beyond the information collected as part of the MSQ, we currently have limited visibility of this risk. We will work with our suppliers to better understand the risk within their supply chain and their management controls, focusing on our highest risk suppliers.

Education of our staff, in field supervision and observation of our field-based suppliers, ongoing communication with our suppliers with more knowledge of the situation and our risks will assist us in the identification of possible modern slavery risks.

## TETRA TECH INTERNATIONAL DEVELOPMENT OPERATIONS

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Tetra Tech International Development has operations in countries that are considered to have a higher inherent risk of modern slavery than the countries in which Tetra Tech operates. Those countries with higher inherent risk include Fiji, Indonesia, PNG, Tonga, Cambodia, and the Philippines.

Tetra Tech International Development's exposure to modern slavery risk is largely indirect and predominantly associated with the level of expenditure into reported high-risk industries rather than evidenced on their direct interaction with modern slavery practices.

Further details regarding the risks in the operations of Tetra Tech International Development can be found in their modern slavery statement.

## OUR ACTIONS

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Tetra Tech Coffey will continue to use the results of our 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 OPERATIONS

The risk of modern slavery within our workforce is considered low due to the candidate review methodologies we adopt, the employee contracts we execute, the remuneration processes and reviews we apply being based on benchmarked data from similar service industries and the modern slavery training we offer to our staff.

We have developed a modern slavery policy that informs our staff of our expectations in relation to the identification, reporting, management and control of modern slavery risks within our operations.

We maintain a whistle-blower policy that includes modern slavery concerns as listed areas of protected disclosure whereby our staff can report concerns without fear of reprisal.

We require our staff to complete modern slavery awareness training as well as awareness training for our whistleblower policy. This internally developed training program educates our staff about the presence and prevalence of modern slavery in the areas in which we operate, explains the process we adopt to minimise the risk of modern slavery in our operations and projects and advises our staff on how to report the identified potential for modern slavery within our operations.

We have developed a diversity, equity and inclusion policy that sets our approach and commitment to a diverse, equitable and inclusive workplace for all employees and contractors. Our goal is to provide an inclusive and productive working environment in which our workers are treated fairly, with respect and dignity and that we seek to understand, embrace, and nurture our unique qualities and collective differences.

We will monitor the performance of our modern slavery screening processes and develop and

implement improvements where warranted. We will continue to collaborate with other Tetra Tech businesses within our region to align our processes and allow the identification of improvement possibilities across businesses.

## OUR SUPPLY CHAIN

Our due diligence in relation to our supply chain includes screening of potential and existing suppliers for the risk of modern slavery within their operations. This screening is part of an ongoing review process for existing and new suppliers. Their answers to the questionnaire enable us to better understand their approach to the identification and management of modern slavery risks within their operations and supply chain. We will continue to screen our suppliers at regular intervals based on their risk profile to understand when changes in their risk profile occur so that remedial measures may be discussed if required.

We maintain a supplier code of conduct. Suppliers are asked to confirm their acceptance of its requirements as part of the initial and ongoing screening processes.

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

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

We will work with critical suppliers identified as high risk to understand the origin of the risk of modern slavery in their work. We will offer support to educate their staff regarding modern slavery risk. We will offer to assist in the identification and implementation of suitable controls to reduce the potential exposure.

## PROCUREMENT

Our procurement procedures include the following requirements, specifically in relation to assessment of risks related to modern slavery:

- ▶ Initial screening of suppliers based on the geographic location of their service offering and the type of service being offered to understand the level of risk each represents. This will allow effort to be focused effectively on those areas and supplier relationships that are posing the highest risk.
- ▶ Screening of selected existing and potential new suppliers for their compliance with the Act, via the online MSQ survey.
- ▶ Ongoing 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 or have in place a suitable alternative.
- ▶ Provision of 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.
- ▶ Providing support for critical, high risk suppliers, identified based on results of the supplier screening process to assist in the reduction of modern slavery risks.
- ▶ Ongoing internal review and improvement of our operations to confirm adherence to the approved processes.

## ASSESSING EFFECTIVENESS

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### ONGOING PROCESS OF REVIEW

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

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

We will seek to assess the effectiveness of our actions by tracking:

- ▶ The number and percentage of our staff who have attended the required awareness and procedure based training.
- ▶ The number and percentage of suppliers who have been screened.
- ▶ The number and percentage of suppliers who have accepted our code of conduct or implemented their own similar terms.
- ▶ The outcomes of the screening process and the number and percentage of suppliers determined as being low, medium or high risk.
- ▶ The results of internal reviews conducted to check for our own compliance with requirements.
- ▶ The 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.
- ▶ The investigations and outcomes of investigations of potential or reported breaches.

## CONSULTATION PROCESS

Tetra Tech Coffey has worked with the Tetra Tech companies in our region to understand and learn from their approach to the identification and management of modern slavery risks and to provide consistency of approach within the companies over which we have control.

We also sought input from Tetra Tech International Development, which is a subsidiary of Tetra Tech Coffey Holding, and has developed its own modern slavery statement.

We consulted with Norman Disney Young, a Tetra Tech Company, that developed its own modern slavery statement.

We consulted with and received input and review from Eco Logical Australia, which is a subsidiary of Tetra Tech Coffey Holding, whose activities are included in this modern slavery statement.

Each of the Tetra Tech Coffey companies provided input to the development of this modern slavery statement prior to its approval and submission.



## REVISION HISTORY

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| Version History | Date          | Revision            |
|-----------------|---------------|---------------------|
| Version 1       | 28 March 2024 | Original submission |