



Commonwealth Modern Slavery Act Statement for financial year ended 5 January 2024

SLR Consulting Australia Pty Ltd

Date: 24 December 2024 Revision 2



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 financial year ending 5 January 2024. It sets out the steps taken during the financial year 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.

This is SLR's first statement under the *Act*.

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 538 staff across 14 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 supply chain is generally limited to providers of niche engineering, advisory and consultancy services, contractors associated with such consultancy services (for example: drillers, services locators, laboratory testing) as well as office supplies, IT services and equipment and facilities management services.

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*.

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.

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 considers that there is a lower risk of modern slavery occurring in the engineering, advisory, and consulting services supply chain our business. This is because of the services nature of the supply chain, the fact that the majority of services supply chain is based in Australia, and the occasions on which we engage suppliers from high-risk countries is minimal. SLR employees are mostly permanent staff with only a small percentage of individuals being employed on a casual basis. Where SLR uses niche consultancy services, contractors, these are subject to an evaluation and assessment prior to any approval and engagement, see section 4 below.

There is a higher risk of modern slavery in the corporate supply chain. From these, facilities management services, purchase of office supplies or personnel protective equipment, represent the higher risk of modern slavery.

Facilities management services are procured by SLR or through building property managers. When engaged by SLR, the suppliers are subject to evaluation and assessment prior to any approval and engagement, see section 4 below.

When provided by building property managers, these are large and reputable property managers, with comprehensive processes and policies, including modern slavery.

Purchase of office supplies, uniforms or personnel protective equipment are procured by SLR usually via large and reputable suppliers with comprehensive processes and policies, including modern slavery. These suppliers are based in Australia however, products may be grown, manufactured, produced in countries with a higher risk of modern slavery. SLR will evaluate and assess the supplier's reputation, processes and policies prior to any approval and engagement.

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.

4.0 Relevant Policies

To address the risk of modern slavery, SLR has an established procurement process for the engagement of such third parties suppliers (Supplier Approval Procedures). The Supplier Approval Procedures are described below, together with other SLR 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 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.
- **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.
- **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

SLR's wholly owned subsidiary companies are listed in Annexure A. In preparing this statement, we checked our internal processes applicable to the relevant entities owned or controlled by SLR. For the subject report period, all subsidiary business operations were integrated with that of SLR. Post the reporting period three subsidiaries have been deregistered.

8.0 Statement Approval

This statement was approved by the principal governing body of SLR Consulting Australia Pty Ltd on 28 May 2025.

A handwritten signature in black ink, appearing to read "Paul Gardiner".

Paul Gardiner
APAC Regional Managing Director

Annexure A - SLR Consulting Australia Pty Ltd wholly owned subsidiaries

Company Name	ACN	Status	Employees
New Environment Pty Ltd	003 980 676	Deregistered	n/a
Windaf Pty Limited	059 448 323	Deregistered	n/a
Northern Resource Consultants Pty Ltd	126 894 693	Deregistered	n/a
NMP Technical Pty Ltd	613 099 540	Non-trading	n/a
KDC Pty Ltd	148 085 492	Non-trading	n/a
360 Environmental Pty Ltd	109 499 041	Non-trading	n/a
Australian Limnological Services Pty Ltd	145 831 554	Non-trading	n/a