



# GHD Group

## Modern Slavery Report

### 2021-22

## Purpose

This statement is made pursuant to the Modern Slavery Reporting requirements of both United Kingdom Modern Slavery Act 2015 (UK) and Australian Modern Slavery Act 2018 (Cth).

The reporting entity is GHD Group Limited as the parent company of the GHD Group of Companies. The Reporting Period is 1 July 2021 to 30 June 2022.

GHD Group Limited reports on behalf of the subsidiary companies owned or controlled by GHD Group Limited which contribute to the annual consolidated revenue for the reporting period for both the United Kingdom and Australian operations. The list of entities (GHD Reporting Entities) is at Table A.

This joint statement is made and submitted on behalf of the GHD Reporting Entities. References in this statement to GHD refer to the GHD Reporting Entities.

This statement reports on the risks of modern slavery in GHD's operations and supply chains and the actions GHD has taken in the last reporting period to address those risks

GHD has reported its Modern Slavery performance in the United Kingdom since 2016 and this report is GHD's third annual response to the Australian legislation.

GHD is a signatory to the United Nations Global Compact and supports the United Nations Sustainable Development Goals. This includes the commitment to work towards eradicating the many forms of modern slavery that exist and improving human rights across our value chain.

We report on our overall sustainability performance on GHD's sustainability@ghd web portal and within our UN Global Compact Communication on Progress.

## GHD's operations, organisational structure, and supply chains

GHD is a professional services company operating in the global markets of water, energy and resources, environment, property and buildings and transportation. GHD provides engineering, architecture, environmental, construction, advisory and digital services to a diverse range of private and public sector clients.

Established in 1928 and privately owned by our people, the GHD group of companies operates across five continents - Asia, Australia, Europe, North and South America, and the Pacific region.

In the Australian operations GHD employs approximately 4000 people and services are delivered by GHD Pty Ltd, GHD Australia Pty Ltd, GHD Woodhead Architecture Pty Ltd and Remediation and Contracting Services Pty Ltd. Our people are employed by GHD Pty Ltd and GHD Woodhead Architecture Pty Ltd.

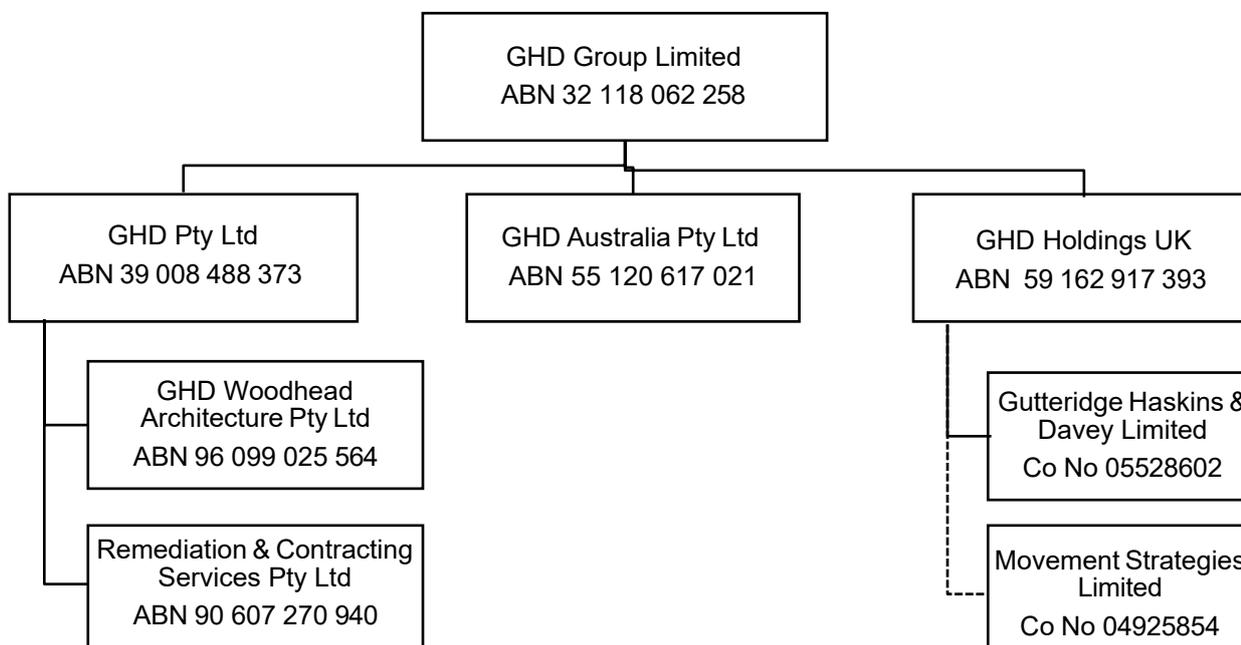
In the United Kingdom GHD employs approximately 400 people and services are delivered by Gutteridge Haskins & Davey Limited, Movement Strategies Limited and GHD Livigunn Limited and our people are employed by those entities.

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**Table A. Operating Entity Structure**



Each of the GHD Reporting Entities have their predominant business operations in Australia and United Kingdom, respectively. Consequently, GHD’s supply chains are predominantly in Australia and the United Kingdom. These supply chains consist of subconsultant and subcontractors for the delivery of professional services and to a much lesser extent suppliers of office consumables such as catering, stationery, IT equipment and PPE supplies.

Given its international nature, GHD does from time to time undertake project work in other countries as part of its broader business strategy. Those opportunities are limited to its core business operations of consulting and supply chains in those countries are similarly limited to professional services.

## Overview of the risks of modern slavery and human trafficking in GHD’s operations and supply chains

GHD has considered the risk that it is causing, contributing to, or enabling modern slavery practices in its operations and supply chains by reference to the countries in which the companies predominantly work and the nature of its services and is of the view that its risk is low.

This is based on:

- The nature of GHD’s services—GHD is a professional services company and is not involved directly in overseas mining, construction, agriculture or other high-risk sectors. GHD’s in-country professional services suppliers (subconsultants) are similarly low risk.
- The location of GHD’s workforce—in addition to Australia and the United Kingdom, GHD draws on its international workforce who are largely situate in GHD offices. This includes a workforce of approximately 800 people in the Philippines who are employed by GHD and where GHD has had an operational presence since 1998 and where, as with all GHD offices, we ensure the strictest compliance with labour and human rights laws.
- The location of GHD’s projects—for projects in countries other than United Kingdom and Australia, an approval process includes consideration of human rights risks.

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- GHD assets are limited to office equipment and consumables. Other assets such as lease interests and intellectual property have no risk. GHD generally does not engage cleaning services. Residual risks are the suppliers of office consumables such as catering, stationery, IT equipment and PPE supplies.

In summary GHD considers its material risks are with subconsultants and suppliers of office consumables.

GHD's management of modern slavery risks falls within its overall approach for managing all human rights-related risks. The risk of modern slavery in GHD's organisation and supply chain is assessed within the enterprise-wide risk management framework. The Board's Audit and Risk Management Committees are responsible for providing oversight on behalf of the Board.

## Due Diligence, Risk assessment and management in relation to Modern Slavery and Human Trafficking

GHD has undertaken appropriate risk assessment during the Reporting Period

GHD undertakes appropriate risk-based due diligence before approving a project. Part of this is an integrity due diligence that includes consideration of the integrity risk posed by a project.

GHD undertakes appropriate risk based due diligence of prospective clients. The purpose of this review is to ensure that GHD is only associated with other companies and personnel that will behave in a manner consistent with GHD's Integrity Management System.

GHD undertakes appropriate risk based due diligence assessment of any prospective business partner before they can be registered as acceptable to be engaged.

Only pre-qualified vendors are engaged on projects to ensure they can deliver quality services in a safe ethical and environmentally responsible manner. To achieve pre-qualification prospective subconsultant and subcontractor vendors must agree to comply with GHD's Vendor Code of Conduct (described below) which includes commitments in respect of modern slavery and human rights.

The prequalification process confirms vendors:

- have adequate Health Safety Environmental and Quality systems to deliver the required services
- can provide services ethically and with integrity
- have adequate and current insurances; and
- commit to adhering to GHD's Vendor Code of Conduct.

GHD's Vendor Code of Conduct prohibits any form of child, forced, bonded or prison labour and participation in any stage of human trafficking. Specifically, GHD's Vendor Code of Conduct covers the following topics:

- compliance with applicable laws
- ethical behaviour
- trade and export controls
- money laundering prevention
- quality
- modern slavery and human rights
- health, safety and wellbeing of employees
- sustainability and environmental responsibility
- privacy and personal data; and
- monitoring and evaluation.

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Elevated risk assessments are required where GHD is:

- working in a country outside its traditional operating environment
- in a joint venture; or
- with a client incorporated in a country outside its traditional operating environment.

## Policies on Modern Slavery and Human Trafficking

The following foundational global policies document GHD's approach to establishing the essential standards of personal and corporate conduct and the behaviour expected of everyone who works for or with GHD (including Directors, employees and vendors). Supporting these documents are specific guidelines and processes that ensure the highest standards are achieved across our business.

### **Code of Conduct**

GHD's Code of Conduct establishes our behavioural expectations and conduct requirements. GHD commits to comply with the laws of the countries in which we operate that are applicable to our work and our people and that promote ethical business practices and personal behaviour consistent with our core values of Safety, Teamwork, Respect and Integrity.

### **Sustainability Policy**

The GHD Sustainability Policy provides strategic direction for how GHD encourage and support our clients and other business partners in their efforts to achieve sustainable outcomes. In an organisational context this means integrating social, economic and environmental issues into core business processes to achieve environmentally and socially responsible operations.

### **Health, Safety and Environment (HSE) Policy**

The HSE Policy seeks to create an outlook and culture in which health, safety and environment principles are at the front of mind and play a part of everyday business in order to eliminate or reduce to So Far As Reasonably Practicable (SFARP) the risk of injury and ill health, minimise our impact on the environment to achieve leading industry practice and prevent pollution.

### **Child Protection Policy (AU)**

GHD's Child Protection Policy aims to protect children associated with GHD-managed international development assistance projects. The policy applies to employees, subcontractors, international sole proprietors and volunteers who are working on GHD projects funded by international development assistance agencies.

### **Preventing Sexual Exploitation, Abuse and Harassment Procedures (AU)**

This framework is built on the relevant United Nations conventions, Australian law and the Australian Department of Foreign Affairs and Trade's corresponding policy. It includes a Code of Conduct with principles for expected behaviours and boundaries and contains procedures which set out what to report and how. The policy applies to employees, subcontractors, international sole proprietors and volunteers who are working on GHD projects funded by international development assistance agencies

### **Integrity Management Policy**

The GHD policy expresses our commitment to ethical business conduct. It also commits to the implementation of an integrity management system with the objective of compliance with the law with a "zero tolerance approach" to unethical and illegal behaviours.

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#### **Human Rights Statement**

The Human Rights Statement articulates our commitment to respect the fundamental rights and dignity of all people in our operations, as well as to encourage and support our clients and other business partners in their efforts to act in accordance with internationally recognised human rights standards.

#### **Whistleblower Policy**

This policy encourages disclosure of improper business conduct and ensures that individuals who disclose improper business conduct can do so safely, securely and with confidence that they will be protected and supported.

For more information regarding GHD's Sustainability program, please visit [sustainability@ghd](mailto:sustainability@ghd).

## **Actions Taken**

During the Reporting Period GHD has reviewed and updated its [Vendor Code of Conduct](#). GHD has integrated adherence to the Vendor Code of Conduct into our vendor prequalification process.

GHD may take steps to assess a vendor's conformance to them and when appropriate, may work with vendors to identify agreed upon actions and timelines to achieve improvement. GHD may choose not to work with vendors who do not meet expectations.

During the Reporting Period, GHD has commenced a project to automate the process for elevated due diligence required in high-risk environments, including human rights risk assessment. The purpose of this project is to ensure that projects which are identified as potentially high risk are captured as it has been noted that not all projects were captured in the existing process. The automated process is expected to go live in September 2022.

During the Reporting Period, GHD has released the Preventing Sexual Exploitation, Abuse and Harassment Procedures (AU). In conjunction with the release, training in the Procedure is planned to be rolled out to all GHD employees and contractors working on GHD projects funded by international development assistance agencies in the next Reporting Period.

During the Reporting Period, the Vendor Prequalification form is being reviewed and updated to add specific Vendor questions relating to the prevention of Modern Slavery. The updated form process is expected to go live in September 2022.

## **Assessment of risk management measures**

We acknowledge that it is difficult to assess the effectiveness of measures GHD take because we do not know of incidents which are not reported.

Notwithstanding, GHD consider some degree of effectiveness of incidents of modern slavery being reported and managed based on limited measurable indicators.

Measurable indicators include:

- vendors failed the existing prequalification relating to Modern Slavery Criteria
- reported incidents under GHD's Child Protection Policy
- reported incidents under GHD's Preventing Sexual Exploitation, Abuse and Harassment Procedures

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GHD has rigorous investigating guidelines. All reported incidents are investigated, managed and ultimately closed out in accordance with the relevant Policy.

## Consultation between entities

During the reporting period, all companies that constitute the Reporting Entities are required to comply with GHD's global policies. The Group's Head of Sustainability; Head of Health, Safety and Environment; Ethics Compliance Officer and Chief Legal Officer work across the Reporting Entities to monitor compliance with the policies outlined above and implementation of the described actions in this statement, and to consider emerging modern slavery issues.

## Training on modern slavery and human trafficking

A training module to raise awareness of modern slavery is included as a mandatory item within GHD's organisational HSE Learning. The module, a seven-minute animation video called "**Modern Slavery,**" defines modern slavery, highlights where it may exist within the value chain, articulates GHD's commitment to preventing it, and explains the actions GHD is taking to do so. A significant percentage of GHD employees assigned to take the training have completed the module.

To build capacity of our current and potential vendors to address modern slavery, we have made the training module available to all vendors via the GHD **Vendor Web portal.**

## Grievance mechanisms and Ethics Hotline

Modern Slavery is prohibited by GHD's Integrity Management Systems. GHD requires suspected or actual breaches of its Integrity Management Systems to be reported. Reports can be raised and managed through GHD's **Integrity Management System** and reported through our **Integrity Hotline** or our internal Integrity Reporting Database. All genuine allegations will be investigated in accordance with GHD's Integrity Management Investigating Procedure.

This statement was approved by the Board of GHD Group Limited on 4 October 2022.



**Rob Knott**  
**Chair**

October 2022



**Ashley Wright**  
**Chief Executive Officer**

October 2022