



TSA Riley

# Modern Slavery Statement

FY2024-25

December 2025



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## Document Control

File location	<a href="https://tsamanagement.sharepoint.com/sites/ESGSector959/Shared Documents/Internal ESG/07 Modern Slavery Prevention/C Statements/FY2024-25 AU/FY25 TSA Riley Australia Modern Slavery Statement RevA.docx">https://tsamanagement.sharepoint.com/sites/ESGSector959/Shared Documents/Internal ESG/07 Modern Slavery Prevention/C Statements/FY2024-25 AU/FY25 TSA Riley Australia Modern Slavery Statement RevA.docx</a>		
Prepared for issue:	Lyndell Roberts	Date:	19 December 2025
Approved for issue:	Andrew Tompson	Date:	19 December 2025



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## Introduction

This statement sets down TSA Riley’s commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place aiming to ensure there is no slavery or human trafficking within our business and supply chains. We have a duty to be alert to risks, however small. Our people are expected to report their concerns, and management are expected to act upon them.

This statement applies to our Australian entities, which are included in this statement as follow:

- TSA Management Group Holdings Pty Ltd ABN: 37 622 812 177
- TSA Riley Group Pty Ltd ABN: 55 622 812 631
- TSA Riley Pty Limited ABN: 71 099 000 272
- TSA Riley (SA) Pty Ltd ABN: 83 602 683 063
- TSA Riley (ACT) Pty Limited ABN: 79 097 795 125
- TSA Riley (VIC) Pty Limited ABN: 32 165 983 586
- TSA Riley (RGB Assurance) Pty Ltd ABN: 84 145 897 418
- Calcutta Group Pty Ltd ABN: 68 147 241 487
- Footprint Holdings Pty Ltd ABN: 64 628 741 579
- The Footprint Calculator Pty Ltd ABN: 22 152 149 454
- The Footprint Company Pty Ltd ABN: 13 149 808 104

The reporting period is 1 July 2024 to 30 June 2025 (FY 2024-25).

This statement is made under Section 14 of the *Modern Slavery Act 2018 (Cth)* on behalf of TSA Management Group Holdings Pty Ltd ABN 37 622 812 177 and its subsidiaries. TSA Management Group Holdings Pty Ltd and its subsidiaries are known as TSA Riley.

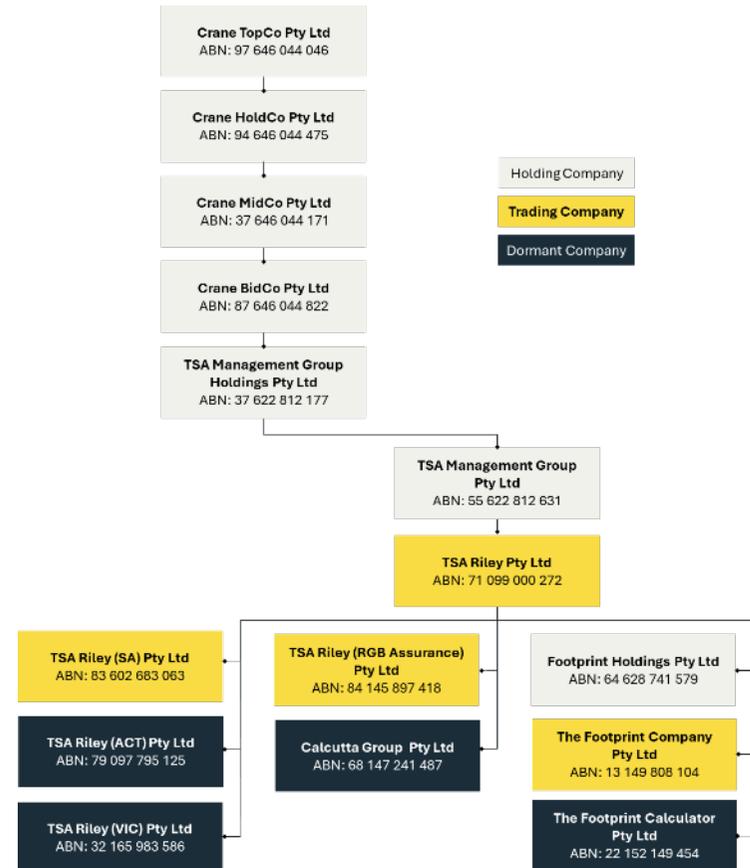


Figure 1: Group ownership structure (extract)

## About us

TSA Riley is committed to preventing modern slavery and human trafficking in all our business activities and ensuring that our supply chains are free from such practices.

## Our business

TSA Riley partners with public and private asset owners to navigate critical decisions that lead to successful property and infrastructure projects.

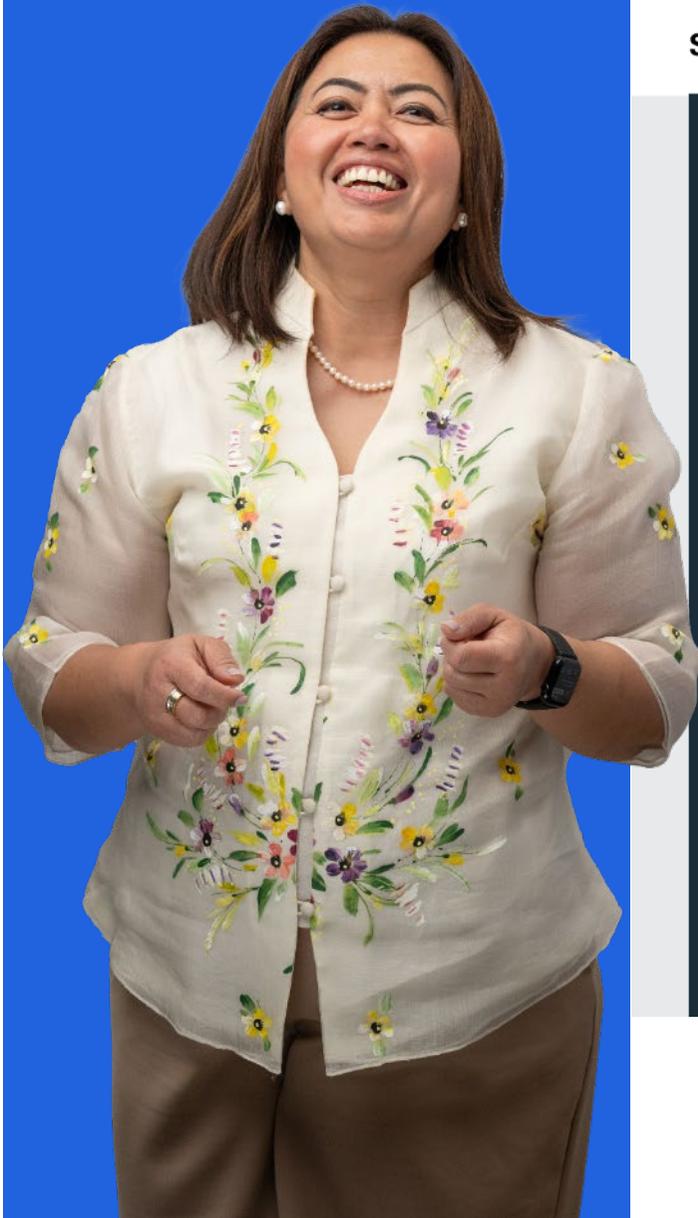
We work across the full lifecycle of projects and asset portfolios – from planning to delivery and optimisation. With global expertise in project management, cost management, advisory, ESG, and asset management, our teams connect the interdependencies across the lifecycle to help clients unlock value at every stage.

Through our connected intelligence – multidisciplinary expertise, global perspective and 130 years of independent thinking – we help clients navigate critical decisions that lead to success.

With more than 1,000 professionals across Australia, New Zealand, Malaysia, the UK and Ireland, we bring global best practice to local projects.



Figure 2: TSA Riley Organisational Structure



### Services and Capabilities



#### Project Management

- Project establishment
- Development management
- Commercial management and procurement
- Design management and buildability
- Programming and scheduling
- Approvals and compliance
- Construction delivery
- Completion and handover



#### Cost Management

- Cost planning and benchmarking
- Cost engineering
- Bills of quantities
- Tendering and procurement
- Contract administration
- Commercial management and valuation
- Value management
- Project monitoring
- Life cycle costing



#### Advisory Services

- Economics and business case
- Procurement and transaction management
- Delivery assurance
- Systems engineering and assurance
- Claims, disputes and expert services
- Health and safety advisory
- Communications and stakeholder engagement
- Change management
- PMO and project controls
- Building surveying
- Data and digital advisory
- Training



#### ESG

- Carbon advisory (decarbonisation advisory)
- Climate advisory
- Nature advisory
- Resource circularity
- Social impact
- Customer experience
- Sustainability strategy, reporting and disclosures
- ESG certification



#### Asset Management

- Strategic asset management
- Asset and facilities operations and maintenance
- Asset and operations performance optimisation
- Asset analytics and insights
- Asset lifecycle planning
- Asset risk and resilience

TSA Riley provides service and capabilities to all our markets and sectors

### Sectors



#### Infrastructure

##### TRANSPORT

- Road
- Rail
- Ports
- Aviation

##### UTILITIES

- Water
- Energy
- Communications and Digital

##### DEFENCE

##### RESOURCES AND WASTE



#### Property

##### SOCIAL INFRASTRUCTURE, COMMUNITY and PLACE

- Health
- Education
- Science and Technology
- Emergency Services
- Sports and Leisure
- Corrections / Justice
- Arts and Culture

##### COMMERCIAL

- Retail
- Land Development
- Tourism and Hospitality
- Manufacturing and Industrial
- Office
- Data Centres
- Logistics and Distribution
- Agriculture
- Entertainment

##### RESIDENTIAL

- Aged care
- Housing

# TSA Riley

Where we operate



## Other office locations:

### Southeast Asia

Malaysia

### New Zealand

Auckland  
Christchurch  
Hamilton  
Queenstown  
Tauranga  
Wellington

### United Kingdom & Ireland

Birmingham  
Bolton  
Bristol  
Cambridge  
Croydon  
Dublin  
Leicester  
Leeds  
London  
Manchester  
Newcastle-upon-Tyne

## Our approach

### Supply chain

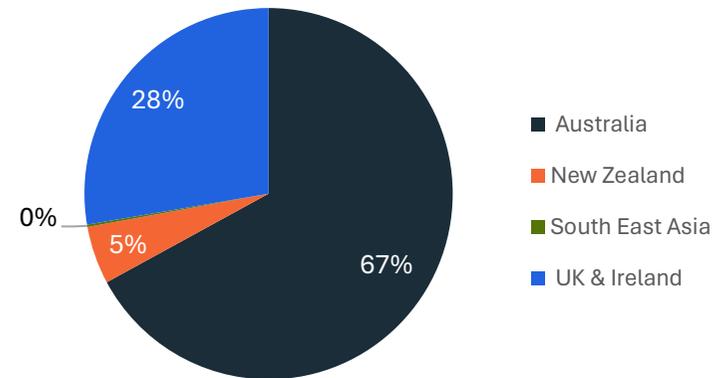
We are a people business, and given the nature of our business, our supply chain largely includes goods and services provided in relation to day-to-day corporate and business operations, rather than our service delivery. As a consulting business, our employees constitute by far the largest single cost.

We have a comparatively short and simple supply chain which includes suppliers such as:

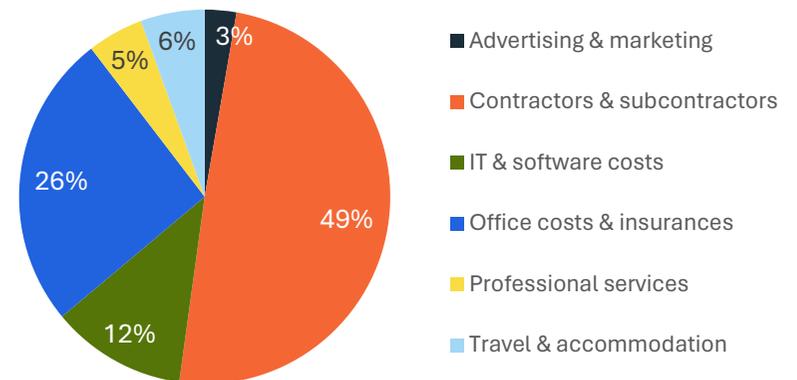
- Advertising & marketing
- Contractors & subcontractors
- IT & software costs
- Office costs & insurances
- Professional services
- Travel & accommodation

Suppliers of many of our corporate and business operations are Tier 1 firms or global providers. Business-to-business spend on such suppliers amounted to 22% of our FY25 consolidated income across some 600 suppliers with payments ranging from \$1 to \$2.6m with an average spend of \$45,000.

**% direct TSA Riley supplier spend by region**



**% of TSA Riley spend by sub-category**



## Governance and consultation

TSA Riley's Group Board and Global Leadership Team (GLT) are dedicated to delivering a balanced, sustainable, and resilient strategy for our business. They guide our vision, manage risks, identify opportunities, and address the needs of our people, organisation, and market. The Board and GLT are responsible for approving our strategic direction related to material impacts and sustainability initiatives, ensuring that impact management is seamlessly integrated into our overall business strategy.

Our consolidated approach to preventing modern slavery is achieved through collaboration with key business leaders, including the Chief Executive Officer, Chief Financial Officer, and Chief Quality and Risk Officer, all of whom are part of the Global Leadership Team. The Global Leadership Team includes representatives from all regions of our business, ensuring a comprehensive and cohesive strategy across the organisation.

We engage with stakeholders—such as our owned and controlled entities, suppliers, and business partners—to identify and mitigate modern slavery risks. During the reporting period and to develop this statement, we engaged and consulted with all companies we own or control (as listed in the Introduction). We discussed the reporting requirements of the *Modern Slavery Act 2018*, shared the actions required to meet these requirements, and provided relevant materials and updates from our due diligence processes.

## Modern slavery risks

**TSA Riley's risk of engaging in modern slavery practices or inadvertently procuring services from a supplier who has engaged in modern slavery is considered low.** Our activities have not changed materially over the last year and correspondingly neither have the identified risks. This assessment is based on the following:

### Geographical risks

TSA Riley's Head Office is in Australia, and the bulk of our operations are based in Australia, New Zealand, and the UK & Ireland regions with small office in Malaysia (<10 employees) .

These regions have strong rule of law and robust government action on modern slavery, resulting in low risk. However, the presence of a small office in Malaysia introduces a slightly higher risk profile compared to our other locations due to regional differences in labour practices and enforcement.

### Direct supplier risks

TSA Riley's supplier risks relate to products and services that support our day-to-day business and operational activities. This includes exposure to imported supplier risks such as suppliers with inadequate labour practices or those operating in high-risk regions.

### Workforce risks

Our workforce is predominately made up of professionals (engineers, project managers, commercial/ procurement professionals, etc) and the type and complexity of the services we offer to our clients generally prevents the use of unskilled or foreign labour.

TSA Riley provides employees with clear written information about their employment or engagement conditions and wages before they commence their employment and we conduct checks on individuals' right to work. We rarely operate under awards systems, but commonly rely on common law contracts given most employees are degree qualified and many are members of relevant professional organisation/s. Our standard employment agreements meet all applicable regulation and are routinely assessed against regulation and industry best practice.

## Client relationship risks

Although TSA Riley operates primarily in low-risk regions, the decision to undertake projects in certain jurisdictions or with certain clients can increase exposure to modern slavery risks. These risks may arise due to:

- **Client procurement practices:** Where clients source materials or labour from high-risk jurisdictions, TSA Riley may be indirectly linked to modern slavery through our advisory or project management roles.
- **Project location choice:** Projects in regions with weak labour protections or enforcement increase the likelihood of exploitation in subcontracting and material supply chains.
- **Influence and leverage:** TSA Riley often has some influence on project governance and procurement standards, which can be used to mitigate these risks through advocacy and contractual requirements.

## Sector and services risks (Tier 2 and 3 Risks)

While TSA Riley's offices are primarily located in low-risk regions, our projects can occur in diverse locations and involve supply chains or subcontractors operating in higher-risk jurisdictions. The sector we work in, the built environment, can involve complex supply chains, subcontracting, and migrant workers, which can increase the risk of labour exploitation, particularly in construction practices and the sourcing of building materials.

TSA Riley does not directly purchase building materials or employ construction labour. However, our project consulting role can influence procurement decisions creating indirect exposure to risk.

Key considerations include:

- **Supply chains for materials:** Building materials (e.g. stone, timber, steel) may originate from regions with weaker labour protections
- **Subcontracting practices:** Multi-tier subcontracting can obscure visibility into labour conditions.
- **Local labour standards:** On-site work in countries with less stringent labour laws increases exploitation risk.



These risks are generally associated with Tier 2 suppliers (subcontractors and material providers engaged through projects) and, in some cases, Tier 3 suppliers (raw material origin).

## Risk assessment

During the reporting period, we conducted risk assessments to evaluate modern slavery risks within our operations and supply chains. This assessment aimed to identify any risks of causing, contributing to, or being directly linked to modern slavery practices. Utilising the Global Slavery Index 2023 (Walk Free 2023), we reviewed our supply chain highlighting potential areas of vulnerability.

### \* Definition of involvement

Understanding our potential involvement is crucial for effectively addressing and remediating modern slavery risks or impacts. The table below categorises the ways we might be involved in modern slavery. It describes how we might cause, contribute to, or be directly linked to a risk or impact.

Involvement Type	Description	Expected Response
<b>Directly linked</b>	Directly linked to modern slavery through their business relationships, even if we are not directly causing or contributing to it.	Use our leverage to prevent and mitigate the impact.
<b>Contribute</b>	Contribute to modern slavery through our operations or supply chains.	Cease, or prevent, and remediate the contribution.
<b>Cause</b>	Causing modern slavery through our direct actions or policies.	Cease, or prevent, and remediate the impact.

*\* Definitions based on the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct.*

Risk area	Definition of involvement*	Why is it a Risk Area (based on Global Slavery Index)	
	<b>Direct supplier risk</b> Electronics (e.g. ICT products, devices)	<b>Directly linked</b> Through our wider business relationships	May be produced by low-skilled and low-wage labour, which may include vulnerable workers such as migrant workers or children in artisanal mines. Electronics and ICT products and their components are often manufactured and mined in high-risk countries.
	<b>Direct supplier risk</b> Branded apparel and marketing merchandise	<b>Directly linked</b> Through our wider business relationships	May be produced by low-skilled and low-wage labour, which may include vulnerable workers, low-wage labour, in high-risk countries.
	<b>Direct supplier risk</b> Cleaning services	<b>Directly linked</b> Through our wider business relationships	Prevalence of vulnerable workers, complex subcontracting practices, and economic pressures leading to exploitative labour conditions.
	<b>Sector and services risk</b> Construction-related supply chains	<b>Contribute</b> Through our clients	TSA Riley does not directly purchase building materials or employ construction labour, but our advisory role influences procurement. Building materials (e.g. stone, timber, steel) may originate from regions with weak labour protections. Multi-tier subcontracting and local labour standards in some jurisdictions increase exploitation risk.
	<b>Project location risk</b>	<b>Contribute</b> Through our clients	Projects in high-risk jurisdictions may involve subcontractors or materials from regions with weak labour protections, indirectly linking TSA Riley to modern slavery risks through project consulting roles.
	<b>Client relationship risk</b>	<b>Directly Linked</b> Through business relationships	If clients source materials or labour from high-risk jurisdictions, TSA Riley may be indirectly linked to modern slavery through project consulting roles.

## Mitigation measures

TSA Riley have the following risk mitigation strategies in place:

- **Grievance mechanisms:** Our grievance mechanism that allows staff to report concerns anonymously. This mechanism is accessible to all staff. Training occurs at onboarding or when the policy changes.
- **Whistleblowing policies:** Our Whistleblowing Policies confirm our commitment to fostering an environment in which staff can make disclosures about matters of public interest without fear of reprisal. This policy is accessible to all staff. Training occurs at onboarding or when the policy changes.
- **Code of conduct:** Our Code of Conduct sets out the actions and behaviour expected of our people when representing TSA Riley. This code is accessible to all staff. Training occurs at onboarding or when the policy changes.
- **ESG Policy:** Our ESG Policy outlines our commitment to acting responsibly across all areas of our operations and striving to create a positive impact through our business operations and the services we deliver. This policy is accessible to all staff. Training occurs at onboarding or when the policy changes.
- **Staff training and communications:** Our company provides modern slavery prevention training to our staff. Currently, this training is available to staff in our Australian region. The training covers modern slavery risks, ethical labour practices, and actions staff can take if they suspect modern slavery in our supply chain or broader community. This training helps build capacity to identify and address potential issues.

Our organisation intranet has a page dedicated to providing our staff information on modern slavery prevention including our latest Statement, latest statistics, related processes, and third-party information.
- **Long-term relationships:** TSA Riley develop long-term relationships with many of our larger suppliers to foster trust and collaboration. We expect suppliers to comply with their legal obligations in relation to modern slavery.
- **Our portfolio of projects:** Downstream from our direct service offering, part of the portfolio of projects that we help to deliver is related to the built environment. The built environment sector faces an elevated risk of modern slavery where business models in the long and multi-tiered supply chains within the built environment favours outsourcing, short-term engagement, and small to medium enterprises, seasonal arrangements, and a high demand for skilled-based labour conditions (*KPMG and Australian Human Rights Commission 2020*).

We consult and partner with our clients to help them deliver their projects. This means that we do not have direct procurement or control, however, we do have opportunities to influence and advise. We ensure that Modern Slavery Statements and/ or policy are received from the Principal Contractors on the projects that we help to deliver.
- **Project and client selection:** In line with our company values, our Global Leadership team applies an ethical decision-making framework to guide project and client selection. This framework ensures that integrity, sustainability, and positive stakeholder impact remain central to our choices. Mitigation measures include due diligence, assessing alignment with our values and long-term objectives. Where concerns are identified or decisions require additional scrutiny, the ethical decision-making process is applied through escalation to ensure transparency and accountability.
- **Gangmasters & Labour Abuse Authority (GLAA):** Our UK & Ireland region have signed up to the GLAA Construction protocol which is aimed at eradicating slavery and labour exploitation in the building industry. We encourage all our suppliers in this region to commit to raising awareness within the supply chain by agreeing to the GLAA Construction Protocol.

## Monitoring and review



TSA Riley have the following monitoring and review strategies in place:

- **Continuous improvement:** TSA Riley completes an annual review and update of our policies and practices, including review of our modern slavery risk assessment and methodology, to ensure they remain effective and compliant with relevant legislation.
- **Supplier audits:** Assessments are carried out as part of an annual business review cycle and based on an historical review of business-to-business supplier spend. In assessing the risks of existing suppliers and service providers, TSA Riley has adopted a risk-based methodology in its assessment which includes:
  - an assessment of the service provider and supplier’s registered address and domicile, noting that those with a head office in countries with a strong rule of law represent a lower risk;
  - the scale of the spend with service providers and suppliers; and
  - the nature of the services and products being purchased.

### Reporting period update

- We have received no complaints, enquiries, or information to suggest that modern slavery has been identified in our supply chain.
- Our Global Leadership Team undertook a knowledge-upskilling workshop focused on ethical decision-making, equipping leaders to identify and manage modern slavery risks and apply our ethical framework in project and client selection.
- We also identified 4 Tier 1 suppliers with modern slavery risk indicators and confirmed that each has a Modern Slavery Statement in place, meeting their reporting obligations.
- Finally, a link to our Modern Slavery Statement was published on the TSA Riley website.

**Statement  
approval**

**Principal governing body approval**

This modern slavery statement was approved by the principal governing body of TSA Riley as defined by the *Modern Slavery Act 2018 (Cth)* (“the Act”) on 18 December 2025.

**Signature of responsible member**

This modern slavery statement is signed by a responsible member of TSA Riley, as defined by the Act:



**Andrew Tompson**  
Chief Executive Officer  
TSA Riley

## Statement annexure



With reference to section 16 of the *Modern Slavery ACT 2018 (Cth)*.

Mandatory Criteria	Page number/s
a. Identify the reporting entity.	Introduction, page 3
b. Describe the reporting entity's structure, operations and supply chains.	About us, page 4 (Our Business, Services and sectors, Where we operate, Supply chain)
c. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Our approach, page 7 (Modern slavery risks, Risk assessment)
d. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Our approach, page 7 (Mitigation Measures)
e. Describe how the reporting entity assesses the effectiveness of these actions.	Our approach, page 7 (Monitoring and Review, Reporting and Transparency)
f. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Our approach, page 8 (Governance and consultation)
g. Any other information that the reporting entity, or the entity giving the statement, considers relevant.	-

The background of the image is a vibrant, multi-colored marbled paper pattern. The colors range from deep blues and greens to bright yellows and oranges, creating a complex, swirling texture. A large, dark blue circular shape is cut out from the center of the image, serving as a backdrop for the text.

# TSA Riley

[tsariley.com](https://tsariley.com)

Australia | Malaysia | New Zealand | United Kingdom | Ireland