



# MODERN SLAVERY STATEMENT

## 2025 Financial Reporting Year

Tetra Tech Holdings Pty Limited (ACN 623 346 225)

NDY Holdings Pty Limited (ACN 002 589 693)



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## INTRODUCTION

This Modern Slavery Statement is jointly submitted by Tetra Tech Holdings Pty Ltd (ACN 623 346 225) (Tetra Tech Holdings, we, us, TTH) and NDY Holdings Pty Ltd (ACN 002 589 693, NDYH).

This statement outlines the actions TTH, NDYH and the various subsidiaries of NDYH have taken to address the risks of modern slavery in operations and supply chains.

This Statement has been prepared in accordance with the requirements of Australian legislation, Modern Slavery Act 2018 (Cth) (the "Act") and covers the organisations' financial reporting period ending 1 October 2025.

## ORGANISATION STRUCTURE

This statement relates to TTH, and its subsidiaries which are NDYH, NDY Management Pty Ltd (ACN 003 234 571, NDYM), Engineering Commissioning Services Pty Ltd (ACN 150986799, ECS), NDY ICS Pty Ltd (ACN 089 674 420, ICS), NDY Holdings (NZ) Ltd (NZCBN 1934886, NZH)

TTH, is wholly owned by Tetra Tech Inc (Org No 112 443 599, Tetra Tech) which is headquartered in Pasadena, California, United States of America.

ENTITY	STRUCTURE	SUBSIDIARIES	REGISTERED OFFICE	COMPANY IDENTIFIER
<b>Ultimate Parent Company</b>				
<b>Tetra Tech Inc (Tetra Tech).</b>	US listed entity	Tetra Tech Holdings Pty Ltd	Pasadena, CA, United States	Org No 112 443 599
<b>Reporting Entity</b>				
<b>Tetra Tech Holdings Pty Ltd (TTH)</b>	Australian private company	NDY Holdings Pty Ltd	North Sydney, Australia	ACN 623 346 225
<b>Subsidiary Entities</b>				
<b>NDY Holdings Pty Ltd (NDYH)</b>	Australian private company	NDY Management Pty Ltd Engineering Commissioning Services Pty Ltd NDY ICS Pty Ltd NDY Holding (NZ) Ltd NDY International Pty Ltd**	North Sydney, Australia	ACN 002 589 693
<b>NDY Management Pty Ltd (NDY)</b>	Australian private company	Nil	North Sydney, Australia	ACN 003 234 571
<b>Engineering Commissioning Services Pty Ltd (ECS)</b>	Australian private company	Nil	North Sydney, Australia	ACN 150 986 799
<b>NDY ICS Pty Ltd (ICS)</b>	Australian private company	Luminova International Pty Ltd**	Melbourne, Australia	ACN 089 674 420
<b>Luminova International Pty Ltd (LI)**</b>	Australian private company	Nil	Melbourne, Australia	ACN 138 823 695
<b>NDY Holdings (NZ) Ltd (NZH)</b>	NZ Limited Company	Norman Disney & Young Limited	Auckland, New Zealand	NZCBN 1934886
<b>Norman Disney &amp; Young Limited (NDYNZ)</b>	NZ Limited Company	Nil	Auckland, New Zealand	NZCN 336379

\*\* Company is not actively trading

# OPERATIONS

## TTH (TETRA TECH HOLDINGS)

TTH is a holding company which operates through its subsidiary, NDYH.

## NDYH (NDY HOLDINGS PTY LTD)

NDYH is a holding company which operates through its subsidiaries NDYM, ECS, ICS and NZH.

## NDY (NDY MANAGEMENT PTY LTD)

NDY is a consulting engineering firm that works with clients worldwide in the construction and property sectors, covering various market segments.

The main services that NDY offers to these clients are engineering design or reporting services. NDY collaborates with clients to create documentation that helps them achieve their project goals. To do this, NDY works alongside other design professionals such as architects, planners, structural engineers, civil engineers, cost consultants (quantity surveyors), project managers and other professionals the client hires.

The engineering services NDY provides include:

Acoustics	Asset performance	Audio visual
Commissioning management	Building information modelling (BIM)	Communications (ICT)
Electrical	Controls & integration	Fire engineering
Interiors	Fire protection	Hydraulics
Mechanical	Lighting	Property consultancy
Smart buildings	Structural & civil	Security
Vertical transportation	Sustainability	

NDY directly employs engineers to provide the services, as well as staff who support the delivery of the services, including finance and treasury functions, marketing and business development, legal and administration support as well as information technology and software development. NDY also uses suppliers who offer assorted services to support the NDY operations, such as administration, engineering, legal, information technology, cleaning, insurance, property leasing and financial.

## ECS (ENGINEERING COMMISSIONING SERVICES PTY LTD)

ECS collaborates with clients globally in the construction and property sectors, covering various market segments, to deliver commissioning management services.

The objective of commissioning management is to affect the safe and orderly handover of the asset from the constructor to owner, ensuring its operability in terms of performance, reliability, safety, information traceability, energy consumption and maintainability in accordance with required standards.

The importance of effective commissioning management cannot be overestimated. Effective commissioning is an essential factor in delivering facilities that provide optimal occupant comfort, low energy consumption and the resultant low carbon footprint.

ECS has recognised Commissioning Management experience, having multiple professional staff registered with the Commissioning Specialist Association in Australia.

ECS services include:

Independent Commissioning Agent	Engineering Inspection and Reporting
Commissioning Management	Witness Testing
Building Tuning	

## ICS (NDY ICS PTY LTD)

ICS is a non-trading entity which provides management support services to NDY.

## NZH (NDY HOLDINGS (NZ) LTD)

NZH is a holding company which operates through its subsidiaries NDYNZ.

## NDYNZ (NORMAN DISNEY & YOUNG LIMITED)

NDY NZ is a trading entity in New Zealand which operates in the same manner as NDY.

## WORKFORCE

TTH operates in Australia and New Zealand through leased offices in Adelaide, Brisbane, Canberra, Gold Coast, Melbourne, Perth, Sydney, Auckland and Wellington. At the time of reporting, TTH had 394 staff across these locations, as outlined below:

ENTITY	EMPLOYEE NUMBERS AND EMPLOYMENT TYPE
TTH	0
NDYH	0
NDY	20 Casual employees 2 Fixed term employees 19 part time employees 248 Full time employees
ECS	1 fixed term employee 1 part time employees 13 Full time employees
ICS	2 Casual employee 8 Fixed term employees 22 Full time employees 4 Part time employees
LI	0
NZH	0
NDYNZ	3 Casual employees 54 Full time employees 4 Part time employees

**Casual employees** are non-permanent employees engaged under an enterprise award with minimum rates of pay and allowances for base-skilled administrative work.

**Fixed term employees** are engaged for a defined term with a specified end date for project-related work.

**Part time and full-time employees** are engaged on a permanent basis and may be employed in a full time or part time capacity.

## SUPPLY CHAIN

Through its subsidiaries, TTH engaged approximately 344 suppliers during the reporting period. Most of these organisations were based in Australia, at 92%, followed by 3% from the USA, 1% from New Zealand and 0.6% from each of the UK, Canada, Philippines, Germany and India. The remaining suppliers were from Singapore and UAE.

In terms of expenditure, 57% occurred in Australia, followed by 19% in the USA, 14% in India, 9% in the Philippines. The remaining regions equated to 1%.

The main services provided to TTH and its subsidiaries, ranked by spending, were:

- Professional technical and outsourced services (28%)
- Intercompany services (24%)
- Government administration (14%)

- Rent (12%)
- Insurance(5%)
- Travel & hospitality (4%)
- Human resources (3%)
- Technology/software (3%)
- Financial and accounting services (2%)
- Legal (1%)
- Professional associations/memberships (1%)
- Property & construction (1%)
- Transport & logistics (1%)

The remaining 1% included office cleaning, employee training and education, utilities, charities and not for profits, media, office supplies and equipment, and waste services.

In reviewing the largest expenditure group, over 70% of the professional technical and outsourced services expenditure was with long term suppliers who provide engineering and administration services.

## RISKS

Given the nature of TTH and NDYH's direct operations in Australia and New Zealand, the risk of causing or contributing to modern slavery through our own workforce is comparatively lower than in more labour-intensive sectors. However, we recognise that modern slavery risks can still arise through our supply chain and business relationships, particularly in outsourced services, facilities-related services such as cleaning, courier and transport, and international sub-consultant and service-provider arrangements where geographic and sector risks may be higher.

While the services provided by subsidiaries of TTH are predominantly professional and advisory in nature, rather than physical construction or manufacturing activities, our procurement of suppliers and engagement of sub-consultants can expose us to modern slavery risks. We therefore undertake annual supply chain screening and targeted monitoring of suppliers where country, industry or service type indicates an elevated risk.

## ACTIONS TAKEN

NDY actively assessed and mitigated modern slavery risks during the reporting period.

## SUPPLY CHAIN SCREENING

An assessment was conducted of NDY's total spend during the reporting period. Out of all suppliers, there were **50 suppliers who represented up to 90% of the aggregate spend** during the reporting period.

These 50 suppliers were evaluated to calculate an overall risk score. Based on their materiality and in terms of the following risk factors:

- Percentage of spend – which places great emphasis and focus on service providers who are our main trading partners, which directly correlates to our ability to influence their decision making.
- Country Risk – which considers the prevalence of modern slavery in the country of the service provider, which has been based on the Global Slavery Index.
- Industry risk – which considers the prevalence of modern slavery in the type of service provided by the service provider, which has been based on the Responsible Sourcing Tool.

The evaluation identified **zero** suppliers as high risk, 29 suppliers were medium risk, 21 suppliers were low risk.

## SUPPLIER ENGAGEMENT

TTH and NDY implement strategies to engage with these main suppliers who pose medium risks, including:

- Working together on resourcing levels to match staff numbers with work demands.
- Working together on work process and improvements to help deliver better outcomes.
- Sharing workload forecast to anticipate resource gaps.
- Frequent on-site meetings between our senior leaders and various levels of their employees.
- Frequent collaboration on project tasks between employees at various levels of both organisations.

Key suppliers are asked to complete an annual survey to report any issues, potential or actual, enabling collaboration to lower the risk in the future. This helps TTH, NDYH and our suppliers to improve our combined awareness of general social and modern slavery risks and take actions to address risk in our mutual supply chain.

TTH and NDYH apply a risk-based due diligence approach to suppliers and sub-consultants. Where screening identifies a supplier as presenting elevated risk, or where a concern, complaint or allegation is raised, the matter is escalated for review by the Modern Slavery Work Group, with support from relevant operational, legal and people teams as required. Further due diligence may include seeking additional information from the supplier, reviewing relevant policies and labour practices, assessing the use of subcontractors or labour hire, and confirming the availability of appropriate grievance and remediation mechanisms.

Where concerns are substantiated, or where a supplier is unable to demonstrate adequate controls, TTH and NDYH may implement corrective actions proportionate to the risk. These actions may include enhanced supplier engagement, requests for remedial action within agreed timeframes, additional contractual requirements, increased monitoring, or reconsideration of the ongoing business relationship. Where any actual adverse impact on people is identified, our approach is to support remediation through engagement with the relevant supplier and other appropriate stakeholders, consistent with our policies and legal obligations.

## **POLICY**

New staff receive the following policies, which help to deal with modern slavery risks, and all staff can access them on our intranet at any time:

- Modern Slavery Policy,
- Supplier Code of Conduct,
- Whistleblower Policy,
- Anti-Corruption Policy,
- Code of Conduct,
- Ethical Statement,
- Workplace Behaviour Policy.

Standard sub consultancy agreements used to engage suppliers and sub consultants are used which include requirements for compliance with Australian laws, our policies, codes, and procedures including modern slavery requirements.

## **TRAINING**

In addition to sharing our modern slavery statement for the previous year with employees, employees are assigned Modern Slavery training that explains what modern slavery is, where it occurs, our commitment, the risks relevant to our business, how to identify indicators of modern slavery, and what to do if they suspect it is occurring. The training also asks staff to acknowledge that they have been provided with and read the modern slavery statement.

During the period, all Modern Slavery courses due were successfully completed, reflecting a 100% completion rate.

Employees are assigned Ethics and Code of Conduct training upon commencement of employment and are required to complete refresher training every two years thereafter.

During the period, over 99% of Ethics and Code of Conduct training courses due were successfully completed.

All staff were also provided with mid-period refresher and awareness training through town hall presentation sessions on Modern Slavery policies.

## **GRIEVANCE MECHANISMS**

Employees and suppliers are urged to promptly report unethical conduct including modern slavery concerns.

In accordance with its Whistleblower Policy, Tetra Tech has established an anonymous 24-hour-a-day Ethics Hotline and anonymous online reporting portal to enable employees to raise concerns about behaviour and incidents that may be in breach of corporate policies, including the Code of Conduct.

No reports or allegations were received through our existing grievance mechanisms during the period.

## **ASSESSMENT OF EFFECTIVENESS**

We assess the effectiveness of our modern slavery risk management framework through governance oversight, coverage measures and outcome indicators. During the reporting period, this included:

- Reviewing the coverage of our supplier screening activities, including the assessment of the 50 suppliers representing up to 90% of aggregate supplier spend.

- Reviewing key supplier engagements, including annual supplier survey participation, with no suppliers requiring further follow-up or escalation.
- Reviewing and updating standard contractual terms and supplier obligations addressing compliance with applicable laws, policies and codes.
- Completion of mandatory training, including 100% completion of Modern Slavery training due during the period and over 99% completion of Ethics and Code of Conduct training due during the period.
- Zero reports received through our grievance mechanisms, with no modern slavery matters reported during the period.

These measures help us assess both the reach of our controls and whether they are identifying and addressing issues in practice. The Modern Slavery Work Group reviews these indicators and reports outcomes to the ESG Committee, which uses the findings to inform priorities and any improvements for the following reporting period.

## CONSULTATION ACROSS OUR GROUP

In preparing this Statement, consultation was undertaken across TTH and the entities it owns or controls, including NDYH, NDY, ECS, ICS and NDYNZ. Input was sought from representatives responsible for operational leadership, procurement, finance, legal, people and ESG matters across the group. This consultation informed the description of our structure and operations, supplier spend analysis, risk screening outcomes, training completion data, grievance mechanisms and the actions described in this Statement.

## APPROVAL

This statement was approved by the board of Tetra Tech Holdings Pty Ltd (ACN 623 346 225) and Directors of NDY Holdings Pty Ltd (ACN 002 589 693) on 13 April 2026.



Stuart Fowler  
Chief Executive Officer

# MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE EXTRACT

## MANDATORY CRITERIA

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

MANDATORY CRITERIA	PAGE NUMBER/S
a) Identify the reporting entity.	1
b) Describe the reporting entity's structure, operations and supply chains.	1, 2, 3, 4
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.	4
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.	4, 5
e) Describe how the reporting entity assesses the effectiveness of these actions.	5
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).*	6
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	N/A

\* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

\*\* You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

1. Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

2. Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.

## NDY, A TETRA TECH COMPANY | CONSULTING ENGINEERS

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## NDY QA SYSTEM

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