



Modern Slavery Statement

16 April 2025

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ABOUT THIS STATEMENT

The Modern Slavery Act 2018 (Cmlth) (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 2024 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

This Statement for financial year 2024 is made pursuant to section 14 of the Modern Slavery Act 2018 (Cmlth) and constitutes Tetra Tech Coffey's Modern Slavery Statement.

The Statement was approved by the board of Tetra Tech Coffey, on behalf of the listed reporting entities on 16 April 2025. This statement be reviewed and updated it as necessary, annually.



Brigid Moriarty

Director – Tetra Tech Coffey Holding Pty Ltd

INTRODUCTION

Tetra Tech Coffey Holding Pty Limited (Tetra Tech Coffey) is a wholly owned subsidiary of Tetra Tech, Inc., a NASDAQ-listed company with a global workforce of 30,000 staff working across over 100 countries.

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

Tetra Tech Coffey'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 and has a separate management team and structure which reports directly to Tetra Tech, Inc.

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

Tetra Tech Coffey proactively identifies and manages 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 the 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

TETRA TECH COFFEY HOLDING

Established in Australia in 1959, Tetra Tech Coffey 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 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 collaborate 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, 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 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 Environmental Approvals & Planning, Terrestrial and Aquatic Ecology, Archaeology & Heritage, Bushfire, Climate Change Adaptation and Resilience, Environmental Offsets & Bio Banking, GIS & Remote Sensing, Water, Land Management, NRM, Restoration Ecology, and Mine Closure Services.
- ▶ **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 is provided on behalf of the listed reporting entities of Tetra Tech Coffey Holding Pty Limited, except for Tetra Tech International Development which has prepared its own Modern Slavery Statement.

OUR STRUCTURE

Tetra Tech Coffey, 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
- ▶ 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

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
 - Sydney, NSW

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

Tetra Tech Coffey has approximately 620 staff across the above-mentioned office locations.

OUR WORKFORCE

Tetra Tech Coffey's workforce comprises 45 casual, 102 part-time and 470 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 approximately 75% of our spend for the reporting period.

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

Our top ten supplier types are shown in Figure 2 and include real estate, related companies (sister companies), drilling services, finance services including tax and auditing, laboratory services, consulting services, legal, recruitment, telecommunications, and equipment.

OUR SUPPLY CHAIN

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

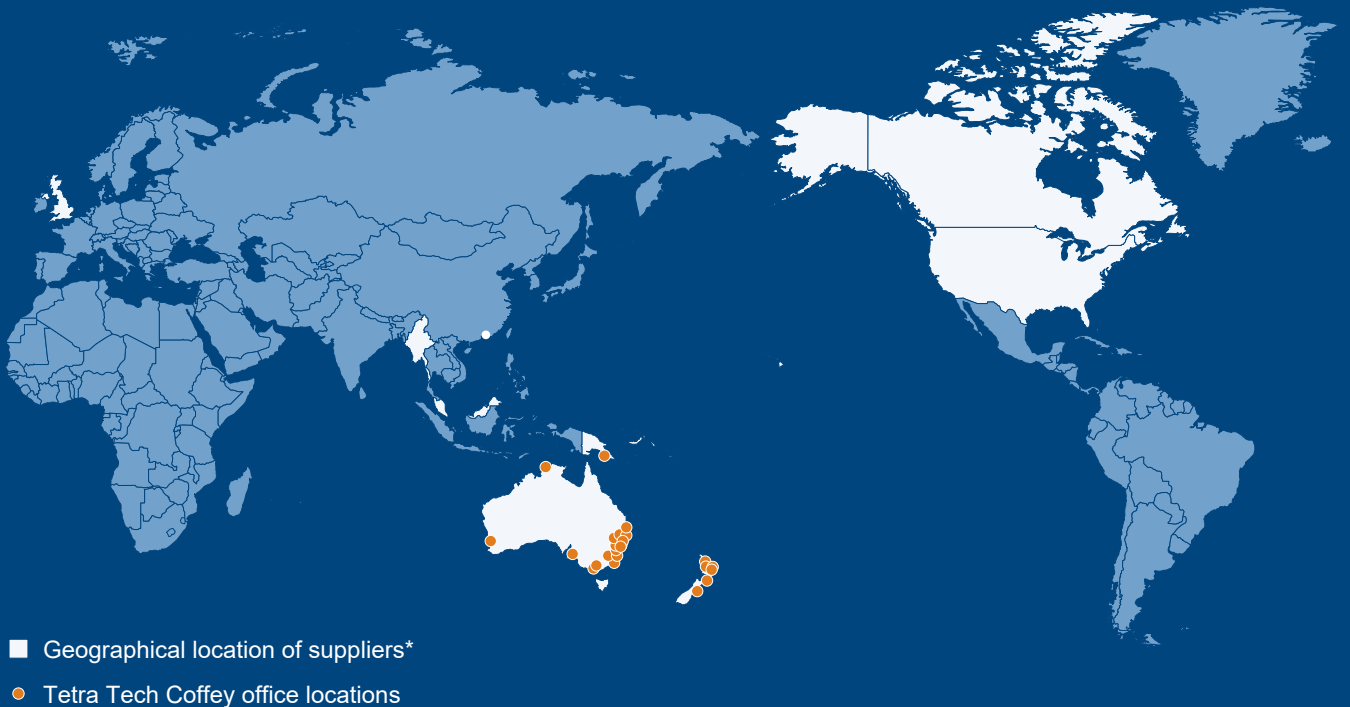


Figure 1: Tetra Tech Coffey supply chain map by region, based on 2024 financial year spend.

*Locations with minor or incidental supplier engagements have been excluded from this graphic.

TETRA TECH COFFEY Top value supplier types

TOP 10 SUPPLIER TYPES
account for 75% of
Tetra Tech Coffey annual
spend in FYR 2024

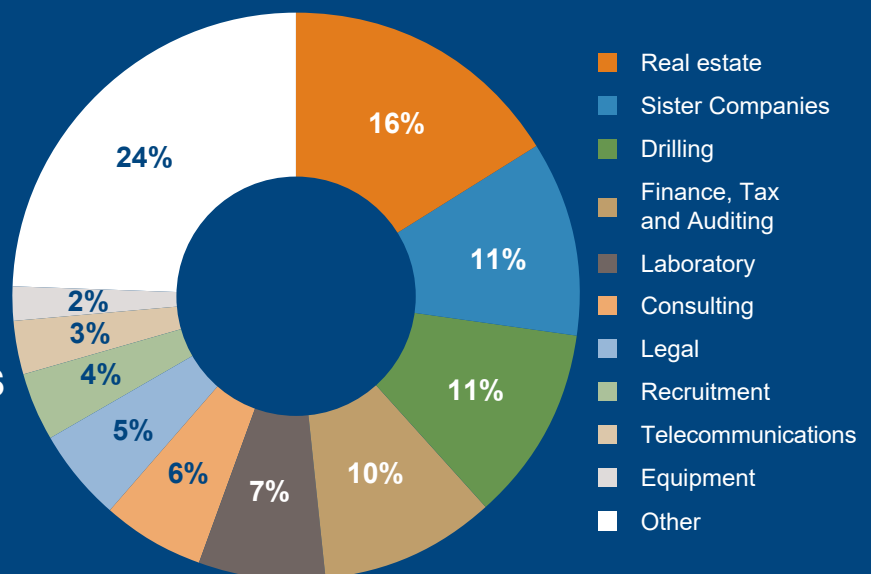


Figure 2: Top ten supplier types for Tetra Tech Coffey 2024 financial year spend.

RISK ASSESSMENT

OPERATIONS

Tetra Tech Coffey employs approximately 620 staff across Australia, New Zealand, and Papua New Guinea (PNG). Most of our employees are employed on a full-time basis (76%), 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. Our employees from Australia, New Zealand or PNG are mobilised to completed work in other locations.

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.

SUPPLY CHAIN

Our suppliers have supply chains that may have risks of modern slavery over which we have limited visibility. 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. 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 have been issued on behalf of Tetra Tech Coffey to a selection of suppliers with reference to:

- ▶ Major suppliers by total spend.
- ▶ Frequently used suppliers, where the total spend was low.
- ▶ Suppliers who conduct activities that may 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.

We have identified that some suppliers, to whom the MSQ has been sent, have been unable or unwilling to complete the questionnaire. For this reason, we are revising our approach to supplier screening.

We have developed a screening tool that allows for a preliminary assessment of potential modern slavery risk, based on the jurisdiction (country of supply) and the activities (scope conducted by the supplier). This allows us to focus our efforts on screening those suppliers with higher risk of exposure. A comprehensive questionnaire will be issued to suppliers deemed medium or high risk to understand their approach to employee engagement and screening, as well as investigating the terms on which their staff are employed.

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 have been screened using an internally developed, preliminary screening tool. The screening tool uses the location of provider (country), the service provided and the value of engagements, assigning a risk score to each.

Each characteristic (location, category and spend) is assigned a relative value in determination of the overall risk score.

Scores below 50 are considered low risk. Scores between 50 and 75 are considered medium risk and scores above 75 are considered to represent a high risk of exposure.

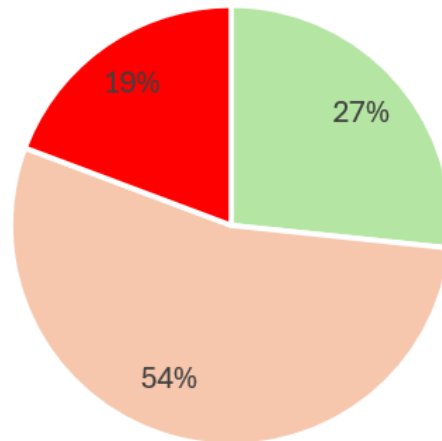
Over 900 suppliers were screened using the preliminary screening tool. Less than 1% of those (seven in total) were rated as representing a high risk of exposure.

Each supplier that returned a high-risk score was in PNG. These suppliers have been contacted to complete a comprehensive modern slavery questionnaire.

The average overall risk score for the suppliers screened was 38/100. This represents an average “Low” risk score.

The average category risk score was 51.6, meaning an overall risk rating of “medium” for the categories identified. We have taken a conservative approach to rating the categories of suppliers we used resulting in a higher score than might have been otherwise achieved. Figure 3 shows a summary of the category risk scores:

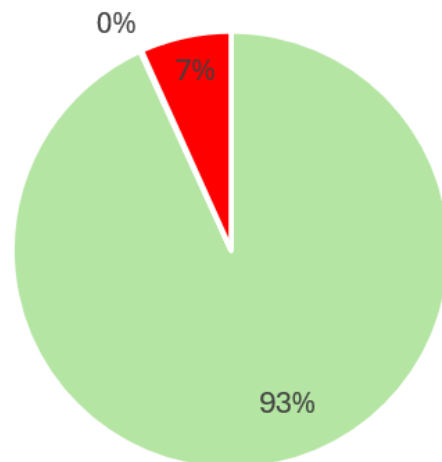
Figure 3 - Category Risk Score



■ Low ■ Medium ■ High

The average location risk score was 25.4 meaning a rating of “low” for the locations identified. Most suppliers engaged by Tetra Tech Coffey are based in Australia and New Zealand with fewer located in other international locations. Figure 4 shows a summary of the location risk scores:

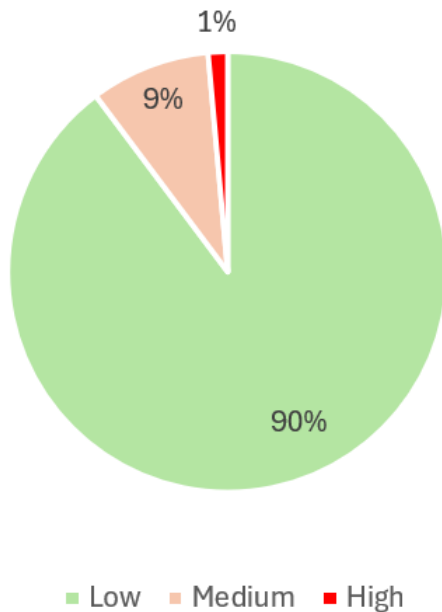
Figure 4 - Location Risk Score



■ Low ■ Medium ■ High

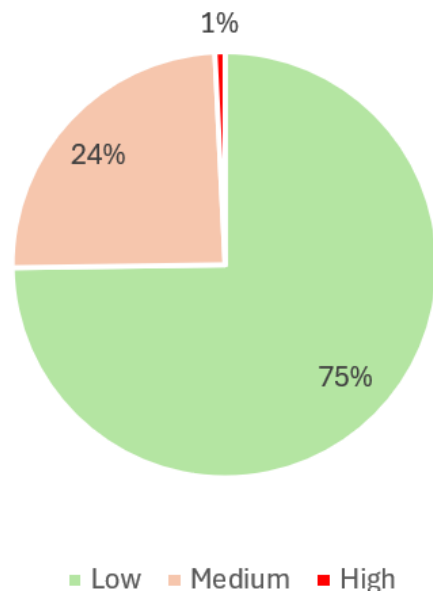
The average spend risk score was 23.8 meaning a rating of “low” for location. Many engagements are relatively low value with relatively fewer engagements of significant value.

Figure 5 - Spend Risk Score



The average overall risk score was 35.6 which is considered to represent a “low” risk score. The overall risk score is a combination of category, location and spend. With most suppliers being based in Australia or New Zealand and with relatively small contract values, even with a conservative approach to the category risk ratings, the overall scores have remained low.

Figure 6 - Overall Risk Score



The review process conducted has identified the suppliers with whom we need to engage with for further due diligence in subsequent reporting periods.

SUPPLIER ENGAGEMENT

We understand that each of our suppliers also has their own supply chains, which may expose us to modern slavery risk. Beyond the information collected as part of the reviews conducted, we currently have limited visibility of this risk. We will collaborate with our suppliers to better understand the risk within their supply chain and their management controls, prioritising 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 ongoing process of identification of possible modern slavery risks.

OUR ACTIONS

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 a 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 established policies that outline our commitment to fostering a workplace that values the wide range of perspectives and backgrounds of our employees, clients and contractors. Our aim is to create a welcoming and productive environment where everyone is treated fairly, with respect and dignity.

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 reassess suppliers who pose a high risk or high potential exposure to modern slavery to:

- ▶ Determine whether their service is critical for 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 collaborate 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, the type of service offered and the spend per supplier, to understand the level of risk each represents. This will focus our effort on those areas and supplier relationships that are posing the highest risk.
- ▶ Screening of existing and potential new high risk suppliers for their compliance with the Act, via a comprehensive modern slavery survey.
- ▶ Ongoing reassessment of suppliers to monitor 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 of and compliance with the Act.
- ▶ 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

ONGOING PROCESS OF REVIEW

We have identified that a low proportion of our suppliers have historically successfully completed the online questionnaire. We do not believe this changes the overall risk of exposure to modern slavery breaches, however it warranted a review of our processes to progress towards more effective screening of suppliers.

Our updated supplier screening methodology includes a preliminary screen and a comprehensive survey of higher risk suppliers to understand their approach to employee engagement and hire, screening of their own supply chain and the procurement of their own services. We believe this approach will allow us to more effectively screen a greater number of suppliers and provide greater certainty in the results of these processes.

We will evaluate the responses to the comprehensive survey for suppliers rated as high risk to determine root causes: the underlying reason for the high rating. Where their involvement on a project is necessary or critical, we will collaborate 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, both preliminary and comprehensive screens.
- ▶ The number and percentage of suppliers who have accepted our code of conduct or implemented their own similar and acceptable 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.
- ▶ 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, and has developed its own Modern Slavery Statement.

We consulted with Norman Disney Young, a related Tetra Tech company, that developed its own Modern Slavery Statement.

We consulted with and received input and review from Eco Logical Australia and other trading companies within the Tetra Tech Coffey group, whose activities are included in this Modern Slavery Statement.

REVISION HISTORY

Version History	Date	Revision
Version 1	16 April 2025	Original submission