



# Turner & Townsend Pty Ltd Australian Modern Slavery Statement 2025

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Turner & Townsend Pty Ltd

2025

### 1.1 Introduction

Turner & Townsend Pty Ltd ACN 115 688 830 is an independent global consultancy and leader, specialising in programme management, project management, cost management and consulting across the real estate, infrastructure and natural resources sectors. Turner & Townsend Pty Ltd is part of an international group of companies operating in 247 offices in 62 countries worldwide. Our Purpose of transforming performance for a green, inclusive, and productive world underpins the way we do business and the work we undertake. Further information about the Turner & Townsend group's structure, functions and the markets within which we operate can be found at <http://www.turnerandtownsend.com>.

Turner & Townsend Pty Ltd's registered office address is: Level 13, 140 Creek Street, Brisbane QLD 4000.

### 1.2 Purpose

Turner & Townsend is committed to operating with the highest levels of professionalism and integrity. This is the foundation we build on to truly make a difference for our people, communities and clients.

The purpose of this statement is to outline Turner & Townsend Pty's approach in Australia to comply with our obligations under the Modern Slavery Act 2018 (Cth) ("the Act"), and our dedication to elimination of modern slavery and human trafficking. Turner & Townsend Pty Ltd is the relevant reporting entity under the Act. Turner & Townsend Pty Ltd adopts a robust approach to slavery and human trafficking. We take a zero-tolerance approach to non-compliance with the Act within our company, our operations and supply chains. This statement applies to all Turner & Townsend Pty Ltd's operations within Australia and their associated supply chains. Our statement is reviewed and amended for good practice, at periodic intervals as appropriate. This statement has been prepared for the reporting period published in June 2025 and outlines our activity for the financial year 2025.

This statement has been created in consultation with and reviewed by the board of directors of Turner & Townsend Pty Ltd. Consultations with the board of directors have involved taking on board their views in identifying, assessing, and addressing modern slavery risks and actions that need to be taken.

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## 1.3 Our Statement

Turner & Townsend Pty Ltd is committed to our business and supply chains being free of any practices of modern slavery and human trafficking. It is our expectation that our employees and our supply chains will respect this commitment and comply with relevant legislation. We are a business that upholds integrity and transparency in all our business dealings and our modern slavery prevention measures are no exception. Our policy and processes and any changes to them are communicated to those affected. We are committed to investigating any claims of suspected human trafficking activity in relation to our business and will take prompt remedial action, where necessary.

## 1.4 Organisational structure and supply chains

### 1.4.1 Structure

Turner & Townsend Pty Ltd is the Australian subsidiary of an international group of companies (Turner & Townsend Group) – see: <http://www.turnerandtownsend.com>. Turner & Townsend Pty Ltd is a subsidiary of the Turner & Townsend Group. The Turner & Townsend Group is a private group of companies operating on a partnership-type model with over 20,000 employees worldwide and operating in 62 countries. The Turner & Townsend Group operates in the UK, the Americas, Europe, Africa, the Middle East, Asia, Australia and New Zealand. In Australia and New Zealand we have over 1,000 employees and operate in Sydney, Perth, Brisbane, Adelaide, Gold Coast, Newcastle, Melbourne, Darwin, Townsville, Canberra, and Auckland. The global head office is in Leeds, UK.

On 1 November 2021, we formed a strategic partnership with CBRE Group, Inc, the world leading commercial real estate services and investment firm listed on the New York Stock Exchange. As part of this transaction, CBRE acquired an interest in 60% of the share capital of our group holding company, Turner & Townsend Holdings Limited. CBRE now owns 70% of the combined Turner & Townsend/CBRE Project Management business. Turner & Townsend remain operationally independent under this legal structure, and there has been no change to our clients; in the way we operate, our commitment to service excellence, or the personal care we demonstrate.

### 1.4.2 Operations

We provide professional services and so our supply chain risks mostly arise from the personnel we engage to carry out those professional services and to support the performance of that work.

### 1.4.3 Supply chains

Our supply chains are comprised of our own direct employees, contractors, other service providers, and manufacturers of a variety of electrical and other products used in professional services.

It is our expectation that our suppliers:

- Comply with the provisions of the Act;
- Adhere to our commitment to a zero-tolerance approach when it comes to any form of slavery or human trafficking;

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- Ensure employment is always freely chosen. We do not tolerate forced, bonded or involuntary prison labour or schemes that give such an effect;
- Take steps to prevent modern slavery within their business and supply chains;
- Pay at least the national minimum wage for Australia-based employees; and
- For non-Australia based locations, the wages of their employees meet applicable local standards;
- Provide safe and hygienic working conditions, taking adequate steps to prevent accidents and injury.

Our financial teams and business management system teams record the suppliers we engage, comprised of short-term and long-term relationships. In addition, a list of potential suppliers, who can support our service delivery, if required by our clients, is available on a supplier database maintained by our operational teams. Turner & Townsend Pty Ltd's supplier database provides a platform to evaluate supplier competence on a specific project/commission. These suppliers are required to submit information covering a wide range of topics relevant to management systems, internal policies, diversity etc.

A supplier pre-qualification questionnaire is required to be completed to assess the general capability of the supplier to provide services on projects to be undertaken for our clients. The supplier pre-qualification questionnaire addresses modern slavery, bribery and corruption, health and safety, personnel/consultants, areas of operation, services offered, and sector experience. A performance assessment is also conducted once a project/commission or other activity is completed. Our direct employment model means that we are largely able to conduct our own checks and that any areas of concern in the supply chains can be identified and audited.

## 1.5 **Polices in relation to slavery and human trafficking**

Our commitment that there is no modern slavery or human trafficking within our business or supply chains is underpinned by the following policies:

- Code of conduct policy: lays out the principles we expect from all our people and third parties, at every level and in every location.
- Third-party code of conduct policy: sets out our expectations of third parties that we engage.
- Labour & human rights policy: outlines Turner & Townsend's commitment to protecting and promoting all human rights, including women's rights and minority rights.
- Employment screening policy: sets out the employment screening checks required during the recruitment process and during employment.
- Anti-bribery & corruption policy: our people and third parties must be aware of and comply with anti-corruption legislation, and our policies and guidelines on corporate conduct.

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- Health, safety and wellbeing policy: outlines the framework for managing health and safety risks in line with the applicable legislation and in alignment with our health and safety objectives.
- Grievance procedure: Turner & Townsend's robust grievance procedure ensures a fair and reasonable approach is taken when grievances raised.
- Whistleblowing policy: sets out the framework under which our people and third parties can report suspected misconduct or wrongdoing, how we manage whistleblowing reports, investigation processes, and how we act to support/protect whistleblowers.

Our Purpose underpins our corporate responsibility strategy, which includes governance and social considerations. We are aligned to the United Nations Sustainable Development goals and United Nations Ten Principles. These are voluntary initiatives based on CEO commitments to implement universal sustainability principles.

In 2017, in addition to the internal processes the Turner & Townsend Group already had in place, an external anti-bribery and corruption hotline was launched providing our workforce with ability to raise concerns independently. Parties involved in our operations and supply chains who are identified as employees or contractors are required to complete an annual anti-bribery and corruption declaration.

## 1.6 Risk assessment and management

As a professional services company, our services are generally delivered by our global workforce. Our direct employment model provides control over the work undertaken and labour conditions under which our workforce operates. We recognise that the highest risk areas are likely to be outside of Australia and New Zealand and that collaboration with the supply chain is needed to prevent such issues arising. That said, our direct supply chain is relatively limited as would be expected of a professional service organisation. Control is provided through various global policies as listed above. On this basis, the risk of modern slavery and human trafficking within our recruitment, employment and associated supply chain in Australia and New Zealand is considered low. We further mitigate the risk through the processes described above. However, we recognise ongoing monitoring to identify any emerging Modern Slavery risks is crucial to eliminating modern slavery.

As part of our commitment to reduce the risk of slavery and human trafficking we undertake risk assessments to prioritise activities designed to mitigate the risk. In 2024, this included incorporating modern slavery risk as a theme in our global corporate ethics and compliance risk assessment process. The outcome of these assessments included:

- Country Risk: Our direct employment model means that the risks of slavery or trafficking are low in Australia and New Zealand. We have established controls to manage risk in our global supply chain.
- Sector Risk: The professional services industry in which we operate in is considered low risk.
- Transaction Risk: As we generally directly employ our workforce, the transaction risks are assessed as low.

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Turner & Townsend Pty Ltd checks effectiveness of implemented actions to manage modern slavery risks by regularly reviewing policies, procedures and data. We run regular audits on the supplier pre-qualification process and related records to determine if mitigation measures have been consistently actioned. Turner & Townsend Pty Ltd monitors any trends in cases reported through grievance mechanisms and how these cases were handled. Turner & Townsend Pty Ltd uses a variety of measures to work proactively with suppliers to ensure that relationships remain positive and productive, and to ensure our expectations are clearly communicated.

## 1.7 Due Diligence

We have implemented robust recruitment practices, including 'right to work' checks for all prospective employees. We maintain a preferred supplier list of agencies that may source candidates on our behalf. This provides an assured overview of those entering the employment process and minimises the risk of forced or involuntary labour.

Our employees are engaged on individual common law employment contracts, underpinned by the National Employment Standards and relevant Modern Awards contained in the Fair Work Act 2009 (Cth). We are committed to complying with all applicable requirements within the workplace relations framework within Australia and New Zealand according to the Fair Work Act and to providing our employees with a safe and equitable workplace in compliance with Health and Safety laws and regulations.

We have human resources representatives working with senior management so that:

- Recruitment practices are fair and equitable and in accordance with the relevant employment laws;
- Company standards, values, corporate behaviours and policies are being adhered to and satisfy working conditions;
- Relevant safeguards are in place; and
- Appropriate training is provided.

## 1.8 Remediation processes

A grievance mechanism and whistleblowing policy is in place for people to safely raise concerns at Turner & Townsend Pty Ltd. Any grievances or complaints are received through either verbal or written communication, reported to managers and/or HR confidentially. Complaints can also be received through Safecall, a global external whistleblowing service that focuses on establishing a safe and confidential reporting system to allow ethical transparency. Employees can contact the whistleblowing hotline as a safe and secure service to speak up and report issues that are unethical, unsafe or unlawful.

## 1.9 Workforce Training

Where relevant, we have/provide our staff with enhanced training when appointing contractors in higher-risk locations.

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## 1.10 Further steps

During the next financial year, we have identified the following activities to progress our commitment to the Act, we shall:

- Prepare our WGEA gender pay gap publication and Gender Pay Gap Report in Australia;
- Work with our significant suppliers in Australia and New Zealand to gain assurance that they are complying with the Act;
- Review the complaints and escalation procedures in respect of slavery and human trafficking in our supply chains and wider business and publish this in future policy statements. This will be inclusive of our safe-call reporting routes as outlined in our whistleblowing and ABC policies and any revisions will be published in future statements;
- Review and amend our standard terms and conditions for the appointment of Australian based contractors, sub-consultants, and general providers to include conditions covering our slavery and human trafficking supplier commitment;
- Review the obligations and scope options for UK-based sub-consultants with an objective to improve our modern slavery provisions and safeguards;
- Set Key Performance Indicators covering the response rate for supplier surveys, percentage of suppliers with sustainability in commercial arrangements and the percentage of suppliers with a human rights policy or modern slavery statement; and
- Conduct supplier process training for relevant personnel to ensure they understand the impact of modern slavery and human trafficking and thus consider how they can make changes to minimise the risks, as appropriate.

This statement dated 23 May 2025 applies to Turner & Townsend Pty Ltd. It has been approved by the Board of Directors.



Darren Munton  
Managing Director – Australia & New Zealand

23 May 2025