



MODERN SLAVERY STATEMENT

2024 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 outlines the actions 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) 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 financial year ended 1 October 2024.

TTH and NDYH jointly submit this modern slavery statement.

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
Ultimate Parent Company				
Tetra Tech Inc (Tetra Tech).	US listed entity	Tetra Tech Holdings Pty Ltd	Pasadena, CA, United States	Org No 112 443 599
Reporting Entity				
Tetra Tech Holdings Pty Ltd (TTH)	Australian private company	NDY Holdings Pty Ltd	North Sydney, Australia	ACN 623 346 225
Subsidiary Entities				
NDY Holdings Pty Ltd (NDYH)	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
NDY Management Pty Ltd (NDY)	Australian private company	Nil	North Sydney, Australia	ACN 003 234 571
Engineering Commissioning Services Pty Ltd (ECS)	Australian private company	Nil	North Sydney, Australia	ACN 150 986 799
NDY ICS Pty Ltd (ICS)	Australian private company	Luminova International Pty Ltd**	Melbourne, Australia	ACN 089 674 420
Luminova International Pty Ltd (LI)**	Australian private company	Nil	Melbourne, Australia	ACN 138 823 695
NDY Holdings (NZ) Ltd (NZH)	NZ Limited Company	Norman Disney & Young Limited	Auckland, New Zealand	NZCBN 1934886
Norman Disney & Young Limited NDYNZ)	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
Commissioning Management
Building Tuning

Engineering Inspection and Reporting
Witness Testing

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 600 staff across these locations, as outlined below:

ENTITY	FULL TIME EMPLOYEES	FIXED TERM EMPLOYEES	PART TIME EMPLOYEES	CASUAL EMPLOYEES
TTH				
NDYH				
NDY	329	105		22
ESC	11	2		1
ICS	32	8	3	1
LI				
NZH				
NDYNZ	75	1	4	6

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 475 suppliers during the reporting period. Most of these organisations were based in Australia, at 91%, followed by 4% from the USA, 1% from the UK, 1% from Canada, 1% from Philippines, 1% from Germany and 1% from New Zealand and the remaining suppliers were from Finland, Hong Kong, Malaysia, India, Romania, Singapore and Vietnam. In terms of expenditure, 56.7% occurred in Australia, followed by 19.7% in the USA, 8.1% in India, 7.5% in the Philippines and 7.3% in Vietnam. The remaining regions equated to 0.7%

The main services provided to TTH and its subsidiaries, ranked by spending, were sub-contractor professional services (36.1%), intercompany professional services (29.7%), rent (9.9%), vendor services (9.4%), insurance

services (3.2%), legal services (2.5%), local government (2.4%), recruitment (2.5%) financial services (2.4%), transportation (1.2%), hospitality (0.8%).

In reviewing the largest expenditure group, over 60% of sub-contractor professional services expenditure was with long term suppliers who provide engineering and administration services.

RISKS

We understand TTH and NDYH businesses based in Australia and NZ are less likely to encounter modern slavery practices than companies working in blue-collar sectors or in countries with more casual workforces, but we also recognise the importance of our role in tackling modern slavery.

The scope and nature of professional services undertaken by subsidiaries of TTH, whilst servicing clients in the property and construction industry, we are not directly engaged to carry out the building, cleaning, or maintaining the physical final product.

Subsidiaries of TTH conduct a supply chain screening annually to monitor for the risk of modern slavery in our supply chain and determine if there are any major suppliers who present a medium or high-risk which warrant further action.

We recognise courier, transportation and cleaning service providers have providers who present higher risks. International sub-consultant service providers may also present risk associated with geographical location, and we conduct specific monitoring of these service providers.

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 **75 suppliers who represented up to 90% of the aggregate spend** during the reporting period.

These 75 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, 27 suppliers were medium risk, 48 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.

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

New employees are assigned relevant training in Modern Slavery which explains what modern slavery is, where it happens, our commitment, what our business risks are, how to spot modern slavery and what to do if they suspect modern slavery is occurring. The training also asks staff to acknowledge that they have been provided with and read the modern slavery statement.

During May 2024, the Modern Slavery training module was transferred to a new training platform to enable reporting of completion results. During this period (16th May 2024 to 1st Oct 2024) 80% of employees completed the training.

Employees are assigned the Ethics and Code of Conduct training upon commencement of employment and is also required to be re-completed every two years thereafter. 100% completion rate was achieved in 2024.

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 instances of modern slavery issues were reported on during this period.

ASSESSMENT OF EFFECTIVENESS

Our Modern Slavery working group reports to the broader ESG Committee and meets regularly to review progress towards key activities to addressing modern slavery. During this reporting period the working group undertook the following:

- Annual review and monitoring of compliance with the Act including reporting the leadership and external bodies.
- Annual review of related policy and procedures, including Code of Conduct and Ethical Statement.
- Shared our Modern Slavery statement for 2023 with all staff and external stakeholders.
- Provided all staff with refresher and awareness training via town hall presentation sessions on Modern Slavery policies.
- Annual review of purchasing data to identify any high-risk suppliers.

CONSULTATION ACROSS OUR GROUP

TTH businesses share resources, policies and supply chains. A Modern Slavery Work Group coordinates consultation across the various TTH and Tetra Tech businesses and reports back via the ESG Committee.

APPROVAL

This statement was approved by the board of Tetra Tech Holding on 1 March 2025.

A handwritten signature in blue ink, consisting of a stylized 'S' followed by a horizontal line.

Stuart Fowler
Chief Executive Officer

NDY, A TETRA TECH COMPANY | CONSULTING ENGINEERS

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