



**Norman  
Disney &  
Young**  
A TETRA TECH COMPANY

# MODERN SLAVERY STATEMENT

2021 Financial Reporting Year

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[www.ndy.com](http://www.ndy.com)

# Table Of Contents

|                               |    |
|-------------------------------|----|
| About this statement.....     | 3  |
| Introduction.....             | 4  |
| Our organisation.....         | 5  |
| Workforce .....               | 7  |
| Our supply chain .....        | 8  |
| Risk assessment.....          | 9  |
| Our actions .....             | 11 |
| Assessing effectiveness ..... | 14 |
| Appendix A: .....             | 15 |





# About this statement

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The Modern Slavery Act 2018 (Cth) (the “Act”) requires entities over a \$100 million annual consolidated revenue threshold that are either classed as an Australian entity or a foreign entity carrying on 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 Norman Disney & Young (“Norman Disney & Young”, “NDY Group”, “NDY”, “we”, “us”) on behalf of the reporting entity Tetra Tech Holdings Pty Ltd in consultation with NDY Holdings Pty Ltd and NDY Consulting Ltd (UK). Alignment with the Act and UK modern slavery legislation is summarised in Appendix A.

This Statement covers the financial year ending September 2021 and was approved by the board of Tetra Tech Holdings Pty Ltd on 23/12/2022.



Stuart Fowler  
Chief Executive Officer  
23/12/2022

A blue ink handwritten signature of Stuart Fowler.



“

We strive to be ethically, environmentally and socially responsible in all we do.

”

# Introduction

Norman Disney & Young (NDY) has a proud tradition of upholding the highest ethical standards in the manner by which we conduct ourselves as a company, which is captured in our 6 values developed in 2011.

The ethical principles embodied in our values, policies and procedures are the signposts by which our employees make business decisions each day. To help ensure that we conduct business according to these principles, we have specific policies and procedures that define what we expect of our people.

We recognise the importance of tackling modern slavery within our society and our supply chain, as well as contributing to broader cross-sector industry awareness and encouraging meaningful action.

Our second Modern Slavery Statement captures our efforts to understand social risks within our supply chain and outlines our actions for minimising, managing and tracking modern slavery related risks as a result of our global operations.

Our Statement builds on our initial supply chain social screening assessment completed in 2018, which has been updated to reflect our 2021 financial year spend and suppliers. This assessment, coupled with joining Informed 365's Property Council of Australia Modern Slavery supplier platform, has underpinned our actions going forward to tackle modern slavery.

## Our values

Excellence

**Do it once, do it well**

Leadership

**Lead in our profession, industry and the community**

Integrity

**Treat others as we wish to be treated**

Collaboration

**Listen, share and contribute**

Accountability & Ownership

**Understand the impact of our actions and own the outcomes**

Innovation

**Inspired creativity to challenge the norm**

## Our Purpose

Making Spaces Work

## Our Vision

**To enhance the lives of others, by engineering outstanding projects, mindful that every project matters**

**To sustain deep and trusting relationships with our clients, through solving their problems and serving them with utmost reliability**

**To engage our people with meaningful, rewarding and inspiring opportunities.**

# Our organisation

Description of our structure, operations and supply chains

## Norman Disney & Young

Established in 1959, Norman Disney & Young, A Tetra Tech Company is a global firm of consulting engineers. With offices in Australia, Canada, United Kingdom, Ireland and New Zealand, NDY is able to deliver innovative, sustainable and tailored solutions for a diverse group of clients. With over 60 years' experience as consulting engineers, NDY has grown its reputation for professional excellence and innovation in building services to a broader suite of client-focused offerings. Our longevity and growth as a leading consultancy is testament to our people and our reputation in the market.

NDY and its subsidiary entities are fully owned by Tetra Tech Inc, a global engineering firm headquartered in California, U.S.A.

For the purposes of this Statement, Tetra Tech Inc. is categorised as a supplier of services to NDY Group, which includes IT infrastructure, licensing and management support.

NDY Group includes the following corporate entities:



## Locations

NDY Group manages offices in the following locations:



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### Australia

Adelaide  
Brisbane &  
Gold Coast  
Canberra  
Melbourne  
Perth  
Sydney



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### New Zealand

Auckland  
Wellington



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### Canada

Vancouver



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### United Kingdom

London



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### Ireland

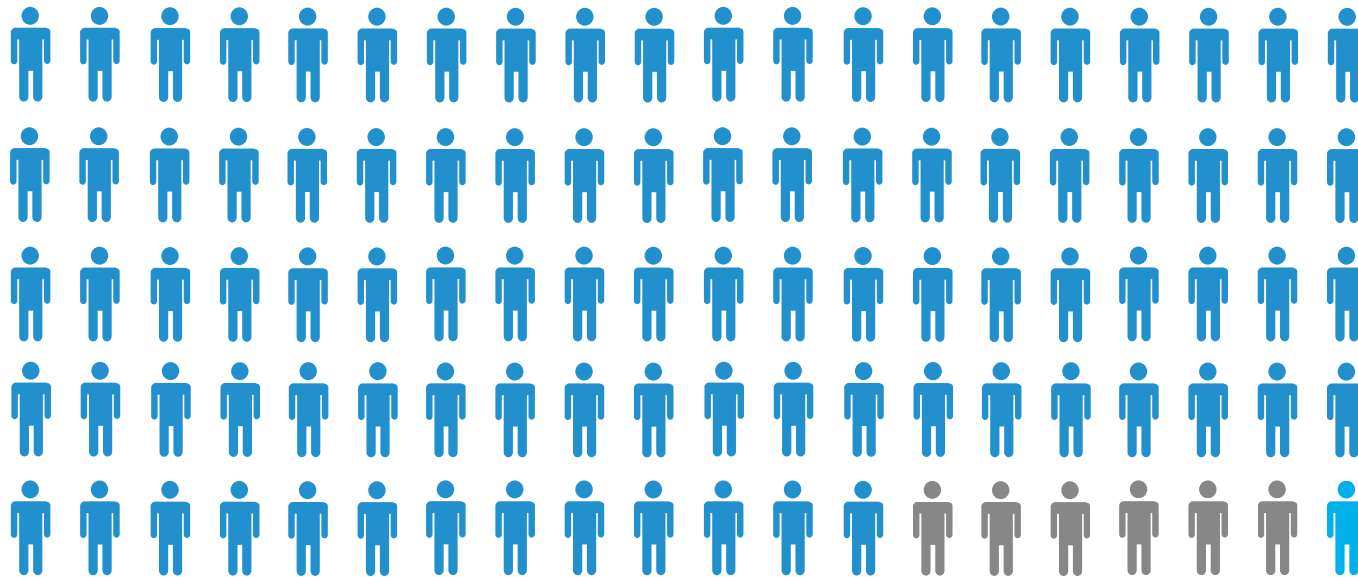
Dublin

This office opened in November 2021 & will be included in the next report

# Workforce



Our global workforce of over 500 staff comprises the following breakdown:



Casual workers are non-permanent staff 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. Permanent workers are engaged on a permanent basis and may be employed in a full time or part time capacity.

- Permanent
- Casual
- Fixed term

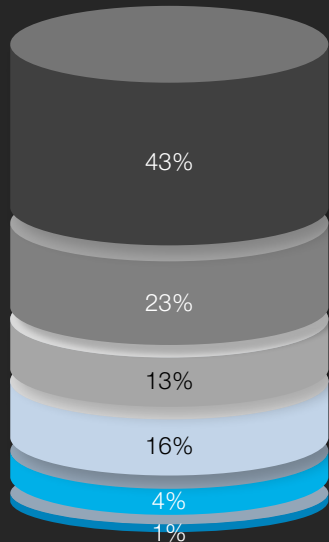


# Our supply chain

A description of the NDY supply chain is provided below.

NDY Supply chain map by region, based on 2021 financial year spend

Geographical location of suppliers



Categorisation of NDY 2021 financial year spend

- Services
- Office rent
- Finance and legal services
- Business Services
- Insurance
- Charities

**678** Tier 1 Suppliers Globally

**65** Suppliers accounted for 90% of NDY Annual Spend in FYR 2021



# Risk assessment

Risk of modern slavery practice in NDY Group operations and supply chain within our control

## Our Supply Chain

NDY Group suppliers include those of administrative labour and CAD design, as well as relevant local suppliers including facilities management services, transport, legal and accounting firms, insurance, and recruitment agencies.

## Supply Chain Mapping

NDY has taken a 2-step approach to mapping its supply chain and modern slavery risk:

1. Industry-based supply chain social screening, which includes risk categories identified under the Act
2. Supplier Engagement Survey, utilising the Property Council of Australia's Modern Slavery supplier platform, administered by Informed 365.



### 1. Industry-based supply chain screening

An industry-based screening of social risks in our supply chain has been undertaken, which incorporates activities that constitute modern slavery. NDY has used an economic input-output model (Socially Extended Input-Output (SEIO) model) to estimate social risks in the supply chain. The input-output matrix evaluates the linkage between monetary flows – such as supply chain flows – and social risks. This allows an assessment of the whole supply chain, considering risks beyond the supply chain's first tier (direct suppliers). This method uses two sets of general data:

- › Monetary flows between sectors and countries
- › Social risks specific to each sector/country



### 2. Supplier Engagement

NDY engages directly with our suppliers as a means to validate our social screening process, refine our understanding of broad social and modern slavery risks and develop actions to tackle risk in both their and our supply chains.

In 2021, NDY began utilising the Informed365 Modern Slavery Supplier Platform as the means to engage with suppliers.

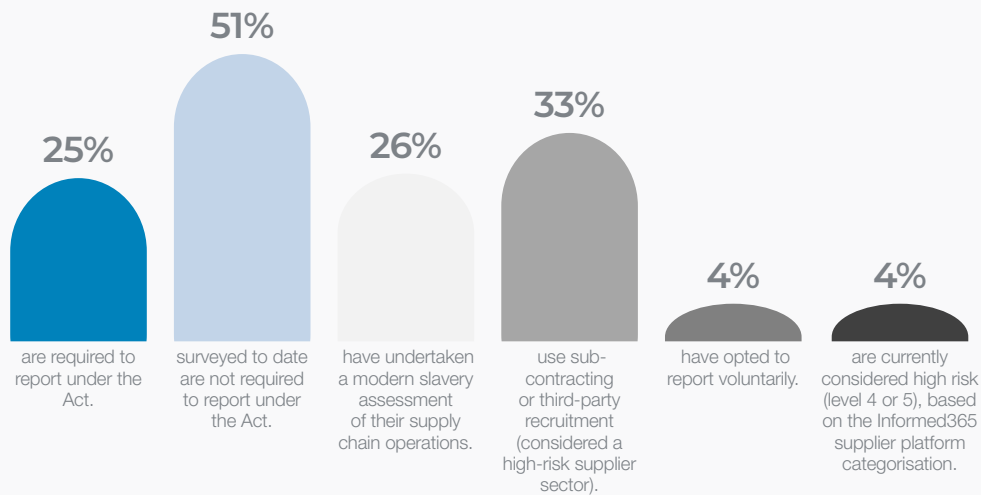
As a member of the platform, NDY participates in the Property Council Australia (PCA) Platform Partners Update, hosted by Informed365.

## Supplier Engagement

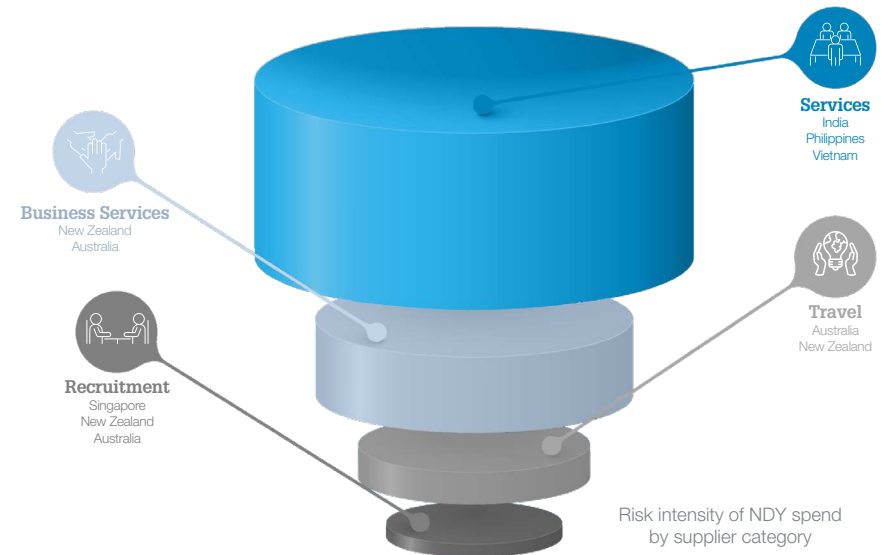
As consulting engineers working for some of Australia's largest property companies represented by the PCA, our continued participation in the Informed 365 Platform demonstrates our commitment to reducing supply chain risk within our professional community, not only in Australia but in all the regions we operate in and procure from.

The supplier information received to date has helped inform the development of our anti-slavery action plan and future reporting.

By the beginning of April 2022, 35% of NDY Group suppliers had either completed or are currently progressing their questionnaire responses. Supplier survey platform and results currently indicate:



## NDY Supply Chain Screening Results based on FY 2021 Spend



To help us properly survey and communicate with our suppliers we need to know the risk profile of the spend categories.

These spend categories cover services procured from all over the world, so it was important for us to understand the location-based risks within each category. NDY broke down total business spend into 13 categories. This information was paired with a social risks database to identify NDY's social risk profile per spend. We then evaluated the location-based risks for the top 4 categories – services, business services, travel, and recruitment.

This information allows us to target suppliers in those regions identified as hotspots for the business.

# Our actions

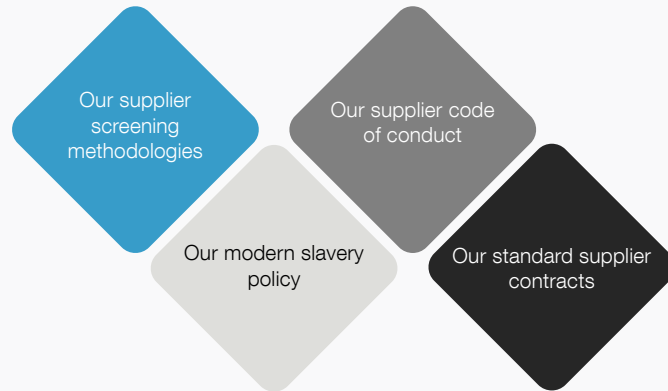
Description of actions taken by NDY to assess and address modern slavery risks; including due diligence and remediation processes.





## Communications and Awareness

We began communicating with our staff regarding Modern Slavery, its importance, our approach to it and the controls we have developed. A significant proportion of our staff are aware of:



Our Statement is displayed and available to download from our website, contained within a dedicated page on our site.

## Training

Our staff training includes:



1

### Awareness

NDY's Modern Slavery Awareness Training covers what modern slavery is, where it happens, NDY's commitment, what our business risks are, how to spot modern slavery and what to do if you suspect modern slavery is occurring.



2

### Acknowledgement

NDY staff, including new staff as part of their onboarding process, are required to read and acknowledge our Modern Slavery Statement.



3

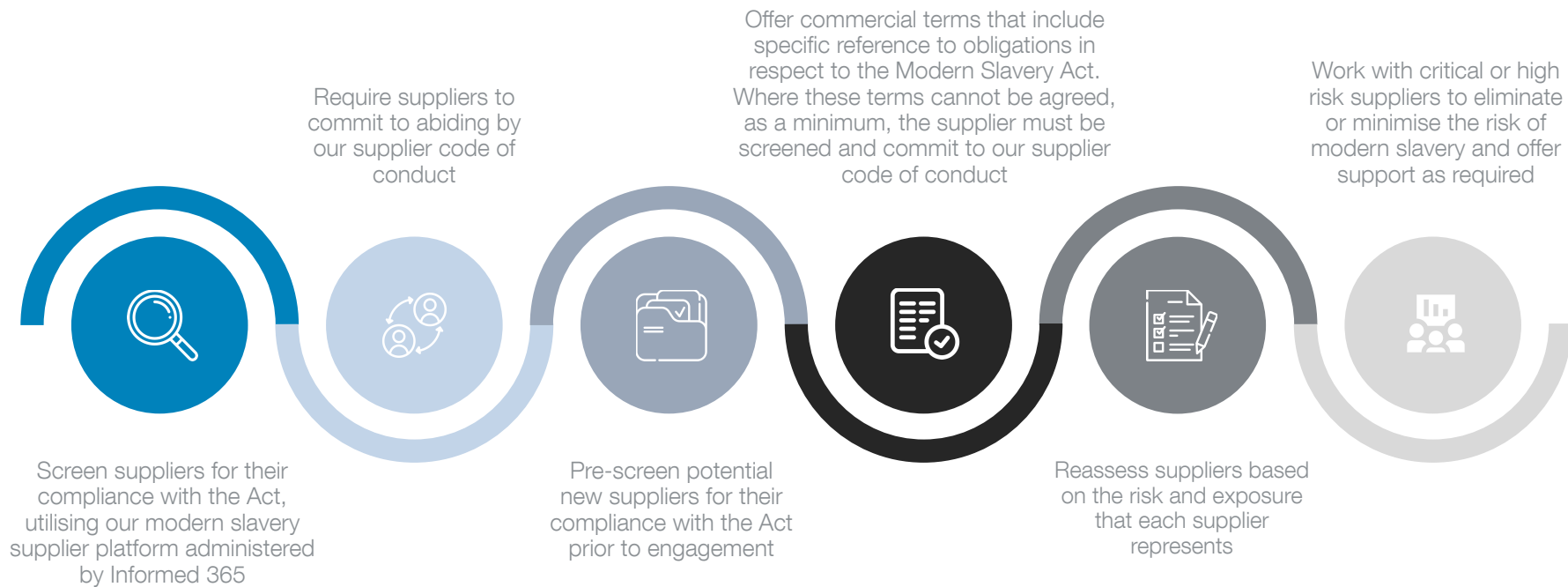
### NDY Approach and Operational Controls

More detailed information on NDY's approach and operational controls regarding Modern Slavery are provided to a selection of staff across the business where procurement, financial management or executive decision-making forms part of their core duties.

## Supplier Engagement

We continued to work across the business to embed modern slavery practices into our supplier screening, engagement and monitoring. This included engaging with our higher risk suppliers, who we work closely with to ensure they comply with our modern slavery requirements.

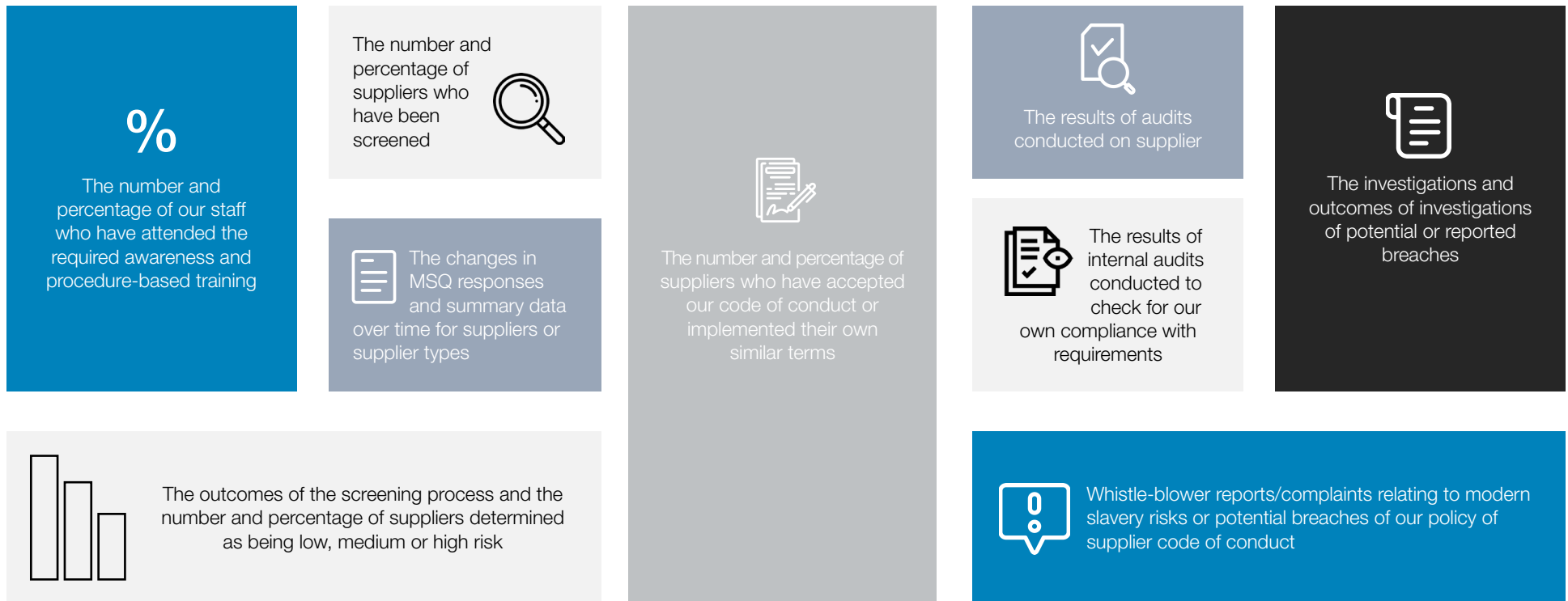
We will continue to incorporate the following practices into NDY's existing integrated Safety, Health, Environment and Quality (SHEQ) management system and procurement practices:



# Assessing effectiveness

Description of how NDY Group is seeking to measure the effectiveness of our actions.

NDY's Environmental, Social and Governance (ESG) Committee monitors NDY's approach to addressing modern slavery. It is working to embed the following metrics into existing systems:





# Appendix A:

## How we are addressing UK and Australian modern slavery legislation

| Australian Modern Slavery Act 2018   | UK Modern Slavery Act 2015<br>(*not mandatory)   | Statement Reference   |
|--|--|---|
| Identify the reporting entity; describe the structure, operations and supply chains of the reporting entity.   | Organisation's structure, its business and its supply chains*.   | About this statement (page 3)<br>Our organisation (page 5)<br>Workforce (page 7)<br>Our Supply Chain (page 8) |
| Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.   | Its due diligence processes in relation to slavery and human trafficking in its business and supply chains*; the parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk*. | Risk assessment (page 9)  |
| Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes; describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement. | (A) a statement of the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place<br>(i) in any of its supply chains, and<br>(ii) in any part of its own business, or<br>(B) a statement that the organisation has taken no such steps. | Risk assessment (page 9)<br>Our actions (page 11)   |
| Describe how the reporting entity assesses the effectiveness of such actions.  | Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.   | Assessing effectiveness (page 14)   |
| Describe the process of consultation with any entities that the reporting entity owns or controls.   |  | About this statement (page 3)   |
| Include any other information that the reporting entity, or the entity giving the statement, considers relevant.   | Its policies in relation to slavery and human trafficking*; the training about slavery and human trafficking available to its staff*.  | Our actions (page 11)   |

# Contact Us

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