

Modern Slavery Statement FY23/24

Tetra Tech International Development Pty Ltd

December 2024



A message from our Managing Director

As a leading development consulting firm, we work with people and communities to achieve a positive impact. We live our values. We deliver intelligent and co-created solutions across the development sphere.

By working with our clients, partners and suppliers, Tetra Tech International Development plays a critical role in helping people and communities navigate development and human rights challenges and enable tangible action towards sustainability, equality and social justice.

Tetra Tech International Development fully supports continued progression and improvement within the development community in order to make development initiatives more effective – including complying at all times across our operations with a ‘do no harm’ approach and protecting those who are vulnerable to human rights abuses.

We are committed to taking action within existing and future development activities to foster the realisation of the Sustainable Development Goals, and to embed the principles of the Paris Declaration on Aid Effectiveness, the Accra Agenda for Action and the UN Guiding Principles on Business and Human Rights into our systems and procedures. We are also committed to addressing the various cross-cutting themes relevant to the development context to ensure that all people can access and enjoy the benefits of our activities.

Our work is geographically diverse – across international, regional and domestic development projects. While we know there are many barriers to development, we believe in empowering people, communities and society to have equal access to opportunities of health, education, economic security, housing, infrastructure and other areas that support the achievement of their outcomes. Through our work, we aim to remove barriers in the way of development; and ensure that people have safe, clean and sustainable environments to live in.

To this end, we have developed our Modern Slavery Statement detailing the ways we are combatting modern slavery not only as it relates to Tetra Tech International Development’s standards for aid delivery, but our expectations and aspirations for our internal organisation. It is important that the principles and actions captured in this statement are understood and embodied by all our staff, no matter what their role may be.



A handwritten signature in dark ink, appearing to read 'Amy Gildea'.

Amy Gildea

Managing Director of Tetra Tech International Development Pty Ltd

December 2024

About this Statement

Our Statement

Tetra Tech International Development condemns all forms of human rights abuses, including Modern Slavery practices. We recognise our role in protecting the human rights of all people involved in, or impacted by, our business operations and supply chains. We acknowledge Modern Slavery as a business risk for every industry and seek to take meaningful steps to identify and address those risks by maintaining responsible and transparent supply chains.

Tetra Tech International Development values the *Modern Slavery Act 2018* (Cth) (Act) and the opportunity to provide a Modern Slavery compliance statement ("the Statement"). We understand that, globally, all businesses are likely to be affected by Modern Slavery, either directly or indirectly. Through engaging in honest and collaborative dialogue within and across industry sectors, we can fully understand the exploitation and abuse that characterise Modern Slavery and raise awareness throughout the supply chain.

As prescribed by the Act, our Statement comprises the following:

- » the reporting entities covered by this Statement (p. 3)
- » our company structure, operations and supply chains (p. 4)
- » Modern Slavery risks in our operations and supply chains (p. 8)
- » the actions we have taken to assess and address those risks, including due diligence and remediation processes (p. 9)
- » how we assess the effectiveness of such actions (p. 11)
- » our process of consultation with our subsidiary entities (p. 13), and
- » other information that we consider relevant regarding our efforts to combat Modern Slavery in our operations and supply chains (p. 13).

Reporting entity, period and approval

This Statement is provided by Tetra Tech International Development Pty Ltd (ACN 007 889 081) under the Act and is an individual Statement covering the financial year ending June 2024.

This statement was approved by the principal governing body of Tetra Tech International Development on 19 December 2024.

Our business

We've been operating in the Indo-Pacific for over 40 years designing, delivering and evaluating aid programs on behalf of governments and donors worldwide, transforming the lives of people and their communities.

Our business

Tetra Tech International Development is a leading global development consulting firm that works with global and local partners including governments, the private sector and civil society organisations to deliver effective and sustainable development projects in 16 countries throughout the Indo-Pacific region.

Our team of over 5,000 development professionals work in more than 80 countries as part of a global network that forms Tetra Tech International Development services.

Purpose

From improving access to education and health services, supporting economic growth and livelihoods, to water, environment and natural resources management, Tetra Tech International Development brings an integrated approach focused on building the capacity of communities and individuals. We help to deliver sustainable projects and positive impact.

Vision

We believe in supporting thriving people, thriving communities and a thriving planet. Our expertise spans sectors across the development life cycle to provide the specialised support required to help partners navigate through dynamic political, social and economic landscapes.

Values

How we work is just as important as what we do. We are a values-based organisation with shared behaviours that we embed into everything we do. These behaviours guide our engagement with our clients, our partners, and the people and communities we work with and support

Structure



Tetra Tech Coffey Holding Pty Limited

ACN 611 080 534



Coffey International Pty Limited

ACN 003 835 112



Tetra Tech International Development Pty Limited

ACN 007 889 081

Tetra Tech International Development is a wholly owned subsidiary of Tetra Tech Coffey Holding Pty Ltd (Tetra Tech Coffey Holding).

Tetra Tech Coffey Holding is a wholly owned subsidiary of Tetra Tech, Inc. a NASDAQ-listed company with a global workforce of 28,000 staff working across more than 100 countries.

Tetra Tech International Development provides substantially different services to the rest of the businesses of Tetra Tech Coffey Holding. Accordingly, this statement does not relate to any of Tetra Tech Coffey Holding businesses unless expressly stated. Tetra Tech Coffey Holding has prepared a separate Modern Slavery Statement.

Office locations

Tetra Tech International Development maintains its central corporate presence in Australia with remote registered offices in the following countries:

- » Papua New Guinea
- » Philippines
- » Indonesia
- » Nauru
- » Fiji
- » Cambodia
- » Vietnam
- » Tuvalu

Operations

In FY23/24, Tetra Tech International Development continued to operate both locally in Australia and overseas in the broader Indo-Pacific region.

As a Managing Contractor, Tetra Tech International Development's operations cover three main levels:

- » Directly employing staff corporately for consultancy services, management services and business operations
- » Subcontracting individuals and companies to deliver specialist services to projects we manage
- » Engaging suppliers for the provision of goods and services to our programs and corporate offices.

The services are provided across these levels:

- » The provision of project management services, research and evaluation services, and technical assistance or advisory services to projects
- » Legal and accounting services
- » Occupancy of offices, including provision of internet services, office equipment, and office maintenance, such as cleaning and security
- » Information technology services
- » Travel and transportation services
- » Insurances
- » Construction services.

Key partners and clients

Our teams work closely with international and local organisations to deliver projects and act as trusted partners to our clients.

Australian Department of Foreign Affairs and Trade

Tetra Tech International Development has worked as a trusted implementing partner to the Australian Government for more than four decades. We design, deliver and evaluate Australian aid investments that help build stable societies, reduce poverty and stimulate economies.

New Zealand Ministry of Foreign Affairs and Trade

Tetra Tech International Development supports the New Zealand Government's aid programme through the evaluation and monitoring of Ministry of Foreign Affairs and Trade activities that aim to deliver prosperity and stability in the Pacific Islands region.

Multilateral and global organisations

We work with the world's largest international development agencies, foundations, bilateral and multilateral donors, such as the Asian Development Bank and the European Commission, to design and implement solutions to global challenges.

Our areas of practice



Australian Consulting

Tetra Tech's Australian Consulting Practice provides the tailored care, integrity and personalised service of a boutique consultancy, a specialisation in relational approaches guided by First Nations leaders, backed by the mobilisation capacity of a multi-national company.



Defence and Human Security

People, communities and economies often thrive when supported by effective security, law and justice systems. We support integrated security, law and justice reforms by working with local, regional and national government institutions, as well as with informal justice and legal systems.



Future Economies

The creation of new jobs and business opportunities helps lift people out of poverty and leads to more stable societies. We train business leaders in developing countries and implement grant funds to support innovative business ideas that can benefit struggling communities.



Digital Health

From training midwives and health workers, to creating or expanding successful healthcare programs, we provide support across a range of health care services, including reproductive health, family planning, HIV/AIDS, immunisation coverage and water, sanitation and hygiene (WASH).



Infrastructure

Our team of experts specialise in architecture-engineering services and sustainable infrastructure design, helping improve access to clean drinking water, sanitation, roads and bridges, health clinics, schools, government building and reliable energy in developing countries.



Research, monitoring and evaluation

Improving results requires an understanding of what works and what does not. We work in partnership with donors, governments, multilateral organisations, foundations, universities, NGOs and businesses to help them understand the effectiveness, efficiency and impact of their work



Climate Justice

With the increase in extreme weather events becoming more frequent and natural resources more scarce, developing countries need our support. We empower communities to mitigate and adapt to climate change through improved resource management and resilient physical and institutional infrastructure.



Education

Our education experts work closely with clients and in-country partners to deliver effective projects that change lives. We strive to strengthen and build capacity within education systems to help build future generations of well-educated citizens.



Inclusion, Justice and Transformation

For Tetra Tech International Development, inclusion is our end goal. We work for a world in which individuals and communities thrive within systems and structures where they belong because the systems and structures were designed with and for them.



Human resource development and leadership

Professional development scholarships offer the next generation of global leaders an opportunity to study and research in Australia, providing graduates with the skills they need to create positive change in their home country.



Policing and Justice

People, communities and economies often thrive when supported by effective security, law and justice systems. We support integrated security, law and justice reforms by working with local, regional and national government institutions, as well as with informal justice and legal systems.

Our supply chain

Tetra Tech International Development delivers a diverse range of services each year to carry out the functions of our core business, and in doing so, have a supply chain reflective of this diversity.

In 2020, we undertook an analysis of our tier one supply chain. The top ten categories of suppliers (by spend) were as follows:



Professional services

- » HR services
- » Consultancy services



Diversified consumer services

- » Education services
- » Legal
- » Security services



Commercial services and supplies

- » Commercial printing
- » Commercial cleaning



Hotels, restaurants and leisure

- » Transit accommodation
- » Function room hire
- » Catering



Construction and engineering

- » Infrastructure grants
- » Construction companies



Health care equipment and supplies

- » Health care equipment
- » Health care supplies



Specialty retail

- » Computer and electronics retail
- » Specialty stores
- » Home furnishing retail



Road and rail

- » Taxis
- » Vehicle rental
- » Goods transportation



Real estate management and development

- » Local offices
- » Expat accommodation



Insurance

- » Insurance brokers
- » Multi-line insurance
- » Property and casualty insurance

We plan to undertake another complete analysis of our tier one supply chain and a limited analysis of our tier two supply chain as part of our workplan for the next three years.

Risk Assessment

Operational and supply chain analysis

For the FY22/23 Statement, Tetra Tech International Development conducted an operational risk assessment through two mechanisms:

1. a corporate led risk assessment of all home office locations
2. all programs completed a risk assessment of their local operations and supply chain specific to their operative environment/country/regional context

These assessments were then analysed and consolidated to produce the Tetra Tech International Development's overall operational risk rating. In order to determine supply chain risk, Tetra Tech International Development evaluated supply chain risks via analysis of results from our Supplier Safeguarding Questionnaires (SSQ) issued to all new suppliers through our supply chain management platform.

Findings

Risk type	Risk rating	Reasons
Causing modern slavery	Low	<ul style="list-style-type: none"> » The majority of Tetra Tech International Development's team members are directly employed and work on contracts under highly visible conditions, which are managed by a central Human Resources team.¹ » Our primary operations are the delivery of management consulting services for the Australian government and, as such, we do not directly engage in high-risk operations.
Contributing to modern slavery	Low	<ul style="list-style-type: none"> » Tetra Tech International Development implements a robust procurement process which integrates the Commonwealth Procurement Rules, incorporating ethical considerations, risk assessments and transparency into procurement. As a result, suppliers are thoroughly scrutinised, modern slavery risks are mitigated, and responsible sourcing practices are fostered across the supply chain. » There was no evidence to suggest we engaged in any purchasing practices which could put pressure on suppliers, leading to modern slavery.
Directly linked to modern slavery	Medium-High	<ul style="list-style-type: none"> » Low visibility over Tier 2 and 3 suppliers. » Our supply chain's geographical complexity and the prevalence of Modern Slavery in the Asia Pacific region. » Low maturity of regulatory and enforcement mechanisms/rule of law across our area of operations. » Engagement with high-risk industries, such as the construction, cleaning and hotel industries. » Analysis of the Safeguard Questionnaire indicated many of our local suppliers did not have sophisticated capabilities for managing modern slavery risks.

For the FY23/24 Statement, a corporate review of the above assessments was undertaken, with the same results maintained.

¹ A small number of short-term staff are sourced through a third-party recruitment agency.

Risk mitigations

Policies

Modern Slavery Policy

The prevention of Modern Slavery practices remains a core risk area for Tetra Tech International Development and is considered a priority in our safeguarding framework. Tetra Tech International Development policies related to Modern Slavery are in the table below:

Tetra Tech, Inc.	Tetra Tech International Development Pty Ltd
Combating in Trafficking in Persons Policy	Modern Slavery Policy Whistleblower Policy
Foreign Corrupt Practiced Act Policy	Safeguarding Code of Conduct
Tetra Tech Code of Conduct	

Through Tetra Tech International Development's Modern Slavery Policy we:

- » state a zero-tolerance approach to Modern Slavery
- » commit to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in our business operations or supply chains
- » prohibit behaviour that leads to Modern Slavery or a breach of Modern Slavery laws
- » require screening of all suppliers
- » require all downstream and partnering agreements to contain a clause that:
 - ensures all supplier contracts prohibit Modern Slavery practices
 - compels assessment of Modern Slavery risks, and
 - compels reporting of Modern Slavery incidents
- » set out Modern Slavery reporting requirements.

In addition to mitigating against modern slavery risks in our operations, Tetra Tech International Development's Modern Slavery Policy is available for

our suppliers to adapt and implement where they do not have an existing policy which addresses modern slavery. The Modern Slavery Policy underwent a review in FY23/24, with the updated Policy (version two) to be launched in FY24/25.

Safeguarding Code of Conduct

Tetra Tech International Development intends to expand the scope of the Safeguarding Code of Conduct to cover Modern Slavery to ensure our suppliers are committed to ethical and responsible sourcing, adhering to all laws and regulations related to Modern Slavery, conduct due diligence and implement risk management plans to address potential risks, including developing additional policies or procedures and conducting supplier audits. The updated Safeguarding Code of Conduct will be launched in FY24/25.

Child Protection Code of Conduct

Tetra Tech International Development's Child Protection Code of Conduct mitigates the risk of the worst forms of child labour in our operations and supply chains. The Code states that we will not hire children for domestic or other labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.

Diversity and Inclusion Policy & Equal Employment Opportunity and Discrimination Free Workplace Policy

Tetra Tech International Development's Diversity and Inclusion Policy and Equal Employment Opportunity and Discrimination Free Workplace Policy mitigate the risk of modern slavery in our operations, by ensuring all staff enjoy the same working rights, standards and conditions, regardless of migrant status.

Whistleblower Policy

Tetra Tech International Development's Whistleblower Policy ensures pathways are available for employees to seek assistance for a range of complaints or concerns, including for labour rights violations and/or exploitation.

Training and education

In 2024, Tetra Tech International Development designed and produced a Modern Slavery Awareness training, with roll out of the training to commence in FY24/25. In the first year of the roll out, the training will be delivered by an internal subject matter expert to all Tetra Tech International Development employees. An online modern slavery module has also been developed for use as an annual refresher for all staff and can be made available to contractors and other third parties on a case-by-case basis.

Tetra Tech International Development's internal subject matter expert will develop bespoke modern slavery risk management training for specific projects, upon request.

Supplier due diligence

As the primary source of Modern Slavery risk lies within our supply chain, particularly the increased risk at Tier 2 and beyond suppliers, our supplier due diligence procedures and system remain a critical mechanism through which we reduce risk. We continue to integrate Modern Slavery questions into our Supplier Safeguard Questionnaire (SSQ) to assess the capability of our suppliers in managing downstream risks.

The SSQ is designed to understand our supplier's risk controls and capability for managing Modern Slavery risks including:

- » policies and procedures
- » risk assessment capacity
- » staff training
- » risk and incident reporting.

Following review and assessment of the SSQs, we mitigate risk in our supply chains through supplier engagement by:

- » re-assessing criticality to our supply chain and whether an alternate and lower risk supplier may be engaged

- » capacity building suppliers to effectively modify their exposure and/or control measures to reduce their level of risk
- » monitor their performance to ensure risks are appropriately controlled.
- » monitor their performance to ensure risks are appropriately controlled.

The SSQ is undergoing a review in 2024, with the updated Questionnaire due to be launched in FY24/25.

Recognising the emerging connection between Modern Slavery and terrorism, the due diligence framework also requires thorough vetting of all downstream partners against common international sanctions lists such as the World Bank Listing of Ineligible Firms and Individuals. This critical process serves to prevent the diversion of funds to entities involved in terrorism or Modern Slavery practices, aligning with our commitment to ethical practices

Risk Management

A Modern Slavery Risk Assessment tool is available for project staff to use to determine whether there are any existing or potential modern slavery risks associated with the program's operations or supply chain.

If the modern slavery risk is assessed as high or very high following the Modern Slavery Risk Assessment, or where staff have a reasonable suspicion that modern slavery could be occurring, staff should use the Modern Slavery Key Indicator Assessment tool to assist in the identification of modern slavery practices. This assessment aligns with the NSW Anti-Slavery Commissioner's Guidance on Reasonable Steps to Manage Modern Slavery Risks in Operations and Supply-Chains, Appendix M – Good practice in identifying forced labour.² It sets out key information and indicators which provide a clear method of determining whether Modern Slavery practices are present and allows staff to clearly and accurately report and manage the issues.

² See Office of the NSW Anti-slavery Commissioner, 'Guidance on Reasonable Steps' (Guidance, 2023) 170
<<https://dcj.nsw.gov.au/content/dam/dcj/dcj-website/documents/legal-and-justice/anti-slavery-commissioner/due-diligence-and-reporting/guidance-on-reasonable-steps.pdf>>.

Assessing effectiveness

For FY22/23, Tetra Tech International Development sought to assess the effectiveness of our actions by tracking certain information/data. The results are as follows:

KPI	Results
The number and percentage of our staff who have attended the required awareness and procedure-based training	No staff, as no trainings were delivered during FY23/24. Training will be rolled out in FY24/25.
The number and percentage of suppliers who have accepted our Safeguarding Code of Conduct or implemented their own similar terms	Safeguarding Code of Conduct not yet launched – it will be launched in FY24/25.
The number of suppliers who have completed the SSQ	For FY23/24, 42 out of 69 SSQs were completed (60% completion rate). 10 SSQs (15%) were not completed and 17 SSQs (25%) were not requested or commenced.
The number of SSQs that have been reviewed and actioned by staff	<p>For FY23/24, of the 42 completed SSQs:</p> <ul style="list-style-type: none"> » 21 returned a low risk ‘No Risk Alert’ score of 1 and did not require further review or actions » 4 returned a moderate risk score of 5: <ul style="list-style-type: none"> – 1 of these was reduced to a low-risk status following review – No reviews or actions were recorded against the remaining 3 SSQ results » 17 returned a high risk ‘Risk Alert’ score of 10: <ul style="list-style-type: none"> – 3 of these were reduced to a low-risk status following review – No reviews or actions were recorded against the remaining 14 SSQ results <p>The above suggests that only 4 (19%) of the moderate-high risk SSQs were reviewed, however, this is based on information from our online platform and may not be an accurate reflection of the work that is being undertaken at the project-level. Regardless, it demonstrates a need for further training and compliance with our screening procedures.</p> <p>As such, we plan to deliver further trainings to all staff on the process for screening suppliers in accordance with our Supplier Screening and Due Diligence Procedure and how to record information on our online platform in FY24/25.</p>
The results of audits conducted on suppliers	No external audits conducted.

KPI	Results
The results of internal audits conducted to check for our own compliance with requirements	No additional results further to what is outlined above in relation to SSQ completion.
Whistle-blower reports/complaints relating to modern slavery risks or potential breaches of our Policy or Safeguarding Code of Conduct	No reports/complaints regarding modern slavery. <i>Note: Safeguarding Code of Conduct not yet launched.</i>
The investigations and outcomes of investigations of potential or reported breaches	N/A.

For future years (commencing from the FY24/25 Statement), Tetra Tech International Development (TTID) will report on the following indicators:

Pillar	Indicator	Target
Governance	The TTID Modern Slavery Policy establishes an accountability framework for managing modern slavery risks across the business	Accountability framework established
	TTID staff are aware of their responsibilities for managing modern slavery risk across the business	95% of staff
Risk identification and assessment	Projects complete a modern slavery risk assessment within three months of project start-up	100% of projects (new projects only)
	Projects review their modern slavery risk assessment at least annually	100% of projects
	Modern slavery risk assessment of corporate operations is reviewed annually	Task completed annually
Risk mitigation	Supplier Screening Questionnaire (SSQ)	90% completion rate
Supplier Due Diligence	All parties who return a high modern slavery risk on their SSQ are regularly followed up (minimum six-monthly) to ensure they are implementing their risk mitigation measures	Relevant parties followed up at least six-monthly
Human Resources	TTID staff receive modern slavery training and other training/resources on their rights at work, workplace policies and how to report any grievances as part of their onboarding	95% of staff
	Relevant local labour, modern slavery or trafficking laws are respected	0 breaches reported

Pillar	Indicator	Target
Training and resources	Modern slavery awareness training refresher is completed annually by TTID staff	90% completion rate
Communication	Modern Slavery poster listing the reporting channels is displayed	In all nine TTID offices
	TTID staff are aware of the requirement to report and how to make a report	95% of staff
Tracking effectiveness	The framework for tracking effectiveness is reviewed	Every two years
Providing and enabling remedy	The number of whistle-blower reports/complaints relating to modern slavery risks or potential breaches of our Policy or Safeguarding Code of Conduct	N/A
	The outcomes of investigations of potential or reported breaches	Outcomes reported as required

Consultation process

For this Statement we worked with Tetra Tech Coffey Pty Ltd, to understand and learn from their approach to the identification and management of Modern Slavery risks and to ensure uniformity of approach with the other companies within the Tetra Tech group.

Workplan

Key workplan activities: the next three years

Risk identification and assessment	<ul style="list-style-type: none"> » undertake modern slavery risk assessments of operations and supply chains of our corporate operations and projects » undertake complete analysis of our tier one supply chain and a limited analysis of our tier two supply chain
Risk mitigation	<ul style="list-style-type: none"> » develop and roll out modern slavery awareness training to all staff » develop a modern slavery Frequently Asked Questions toolkit for staff » develop a resource for staff on managing modern slavery risk in procurement » review, update and implement Supplier Screening and Due Diligence Procedure » develop and implement Safeguarding Code of Conduct » annual review of Modern Slavery Policy
Tracking effectiveness	<ul style="list-style-type: none"> » implement assessing effectiveness framework, including developing annual staff survey and biannual compliance check for projects
Remediation	<ul style="list-style-type: none"> » develop and implement Safeguarding Investigation and Remediation resource