



Modern Slavery Statement

FY2023-24

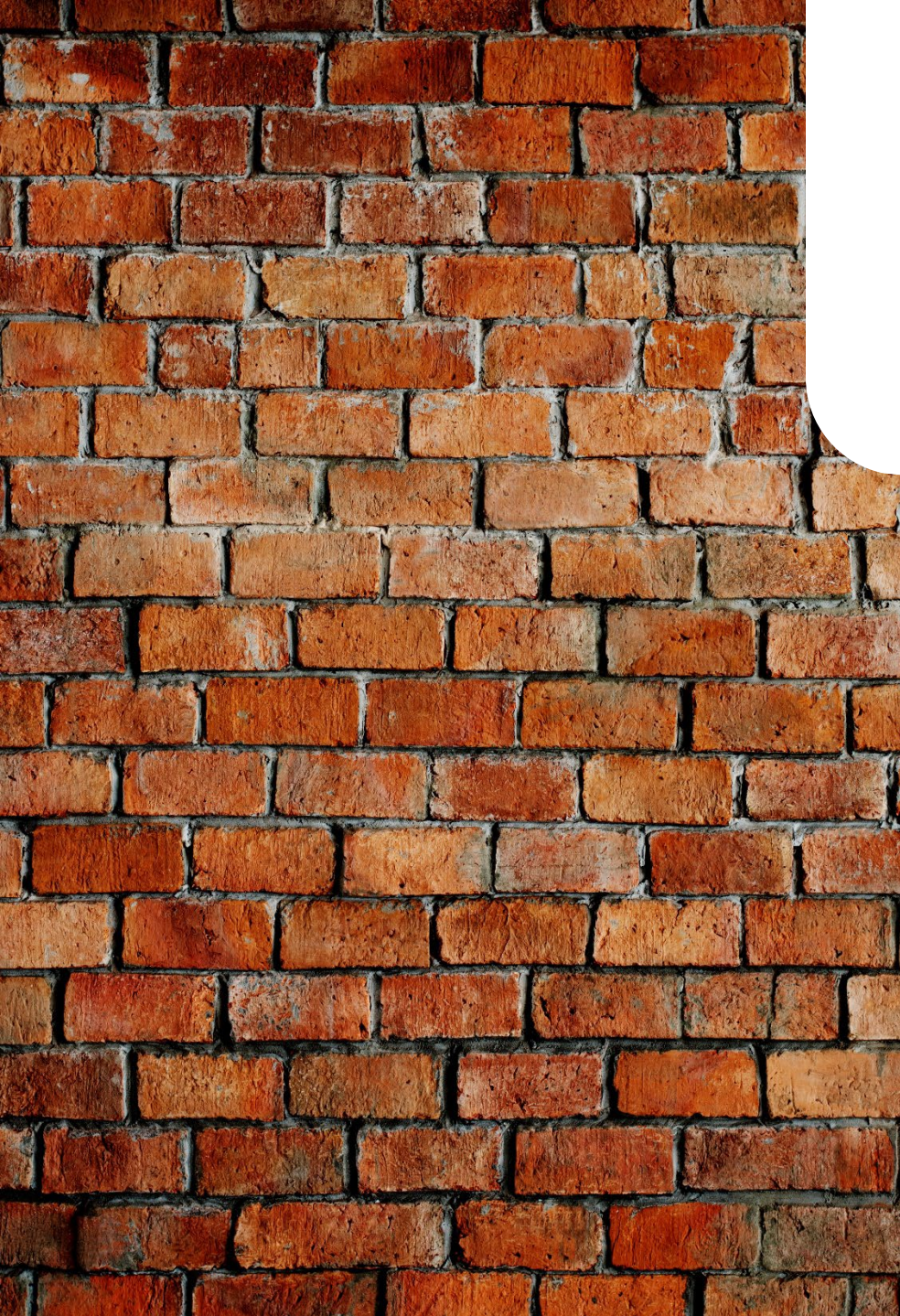
April 2025



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Prepared for issue:	Lyndell Roberts	Date:	4 March 2025
Approved for issue:	Paul Edwards	Date:	9 April 2025



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Introduction

The statement sets down TSA Riley's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking within our own business and supply chains. We all have a duty to be alert to risks, however small. Our people are expected to report their concerns and management to act upon them.

This statement is made under Section 14 of the *Modern Slavery Act 2018 (Cth)* on behalf of TSA Management Group Holdings Pty Ltd ABN 37 622 812 177 and its subsidiaries. TSA Management Group Holdings Pty Ltd and its subsidiaries are known as TSA Riley.

Reporting entities included in this statement follow:

- TSA Management Group Holdings Pty Ltd ABN: 37 622 812 177
- TSA Riley Group Pty Ltd ABN: 55 622 812 631
- TSA Riley Pty Limited ABN: 71 099 000 272
- TSA Riley (SA) Pty Ltd ABN: 83 602 683 063
- TSA Riley (ACT) Pty Limited ABN: 79 097 795 125
- TSA Riley (VIC) Pty Limited ABN: 32 165 983 586
- RGB Assurance Pty Ltd ABN: 84 145 897 418
- Calcutta Group Pty Ltd ABN: 68 147 241 487
- Footprint Holdings Pty Ltd ABN: 64 628 741 579
- The Footprint Calculator Pty Ltd ABN: 22 152 149 454

The reporting period is 1 July 2023 to 30 June 2024 (FY 2023-24).

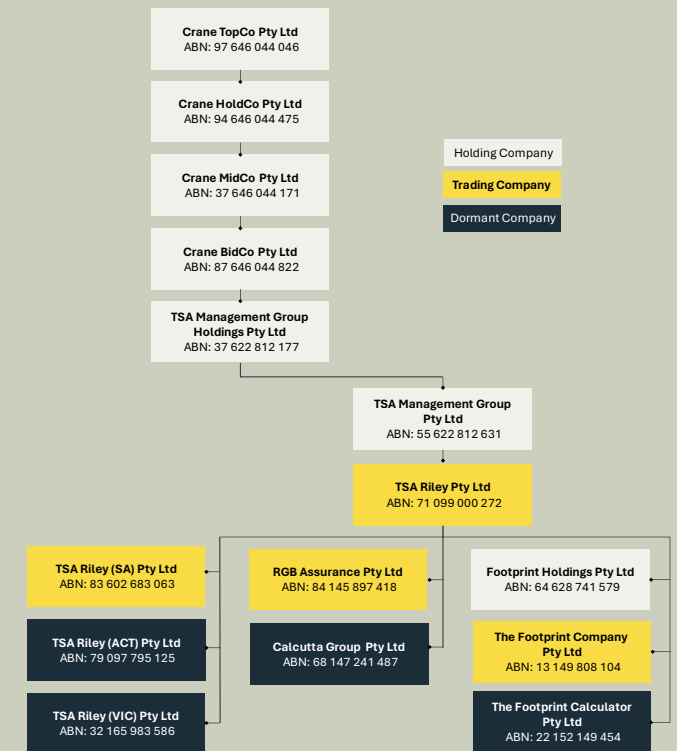


Figure 1 Group ownership structure (extract)

About us

TSA Riley is committed to preventing modern slavery and human trafficking in all our business activities and ensuring that our supply chains are free from such practices.

Our business

We help clients and communities realise the transformative power of their built assets.

TSA Riley are an independent global project consulting business on built assets and projects. We help clients plan, procure, deliver, optimise and decarbonise their assets and operations.

Our difference lies in our global reach, wide range of sectors, and unique depth and breadth of services.

Our strength lies in how we work together, each of us supported by the collective knowledge of an international team of experts.

Our leaders bring their extensive hands-on experience to every project and team. They create a culture of integrity that empowers each of us to always do the right thing: by each other, our clients and our communities. We're pioneers, defining the new category of project consulting.

Our unique combination of services helps drive real value and positive impact for clients' projects.

Side by side with them, we're solving the most important challenges of our time.

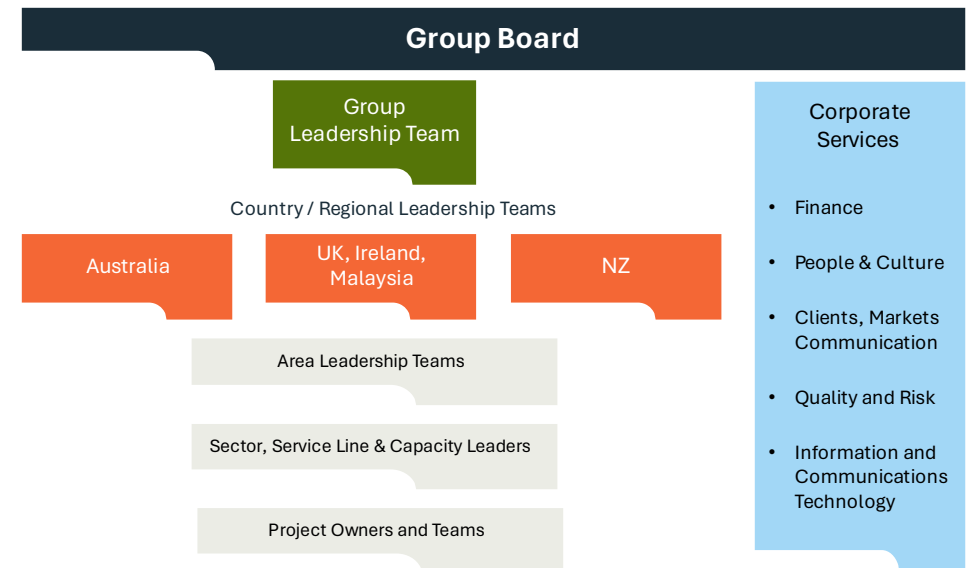
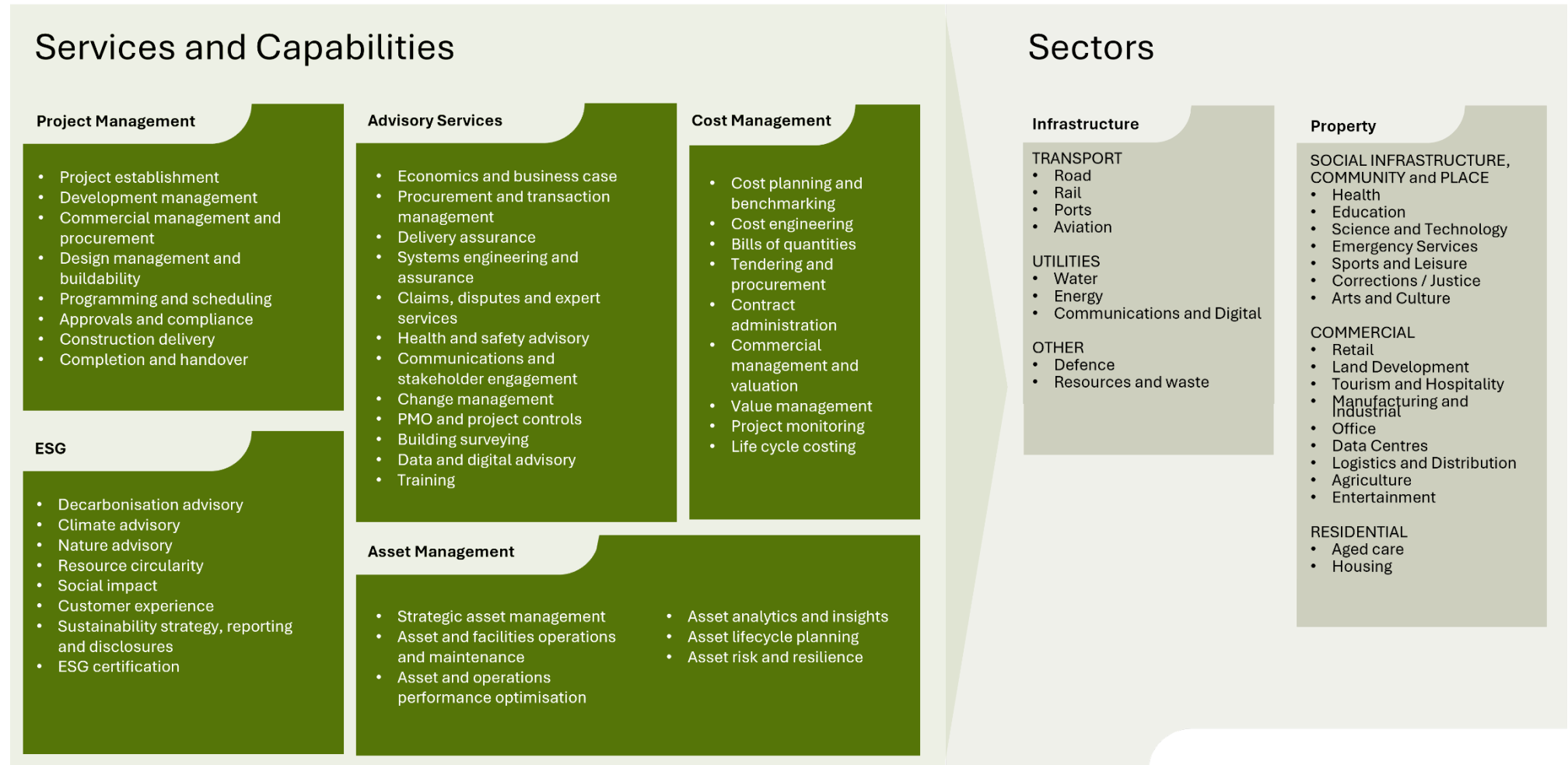


Figure 2 TSA Riley Organisational Structure

Services and sectors



Where we operate

AUSTRALIA

Adelaide
Ballina
Brisbane
Canberra
Darwin
Melbourne
Perth
Sydney
Western Sydney

NEW ZEALAND

Auckland
Christchurch
Hamilton
Queenstown
Tauranga
Wellington

UNITED KINGDOM & IRELAND

Birmingham
Bolton
Bristol
Cambridge
Croydon
Dublin
Glasgow
Leicester
Leeds
London
Manchester
Newcastle-upon-Tyne

SOUTHEAST ASIA

Kuala Lumpur



Our approach

Supply chain

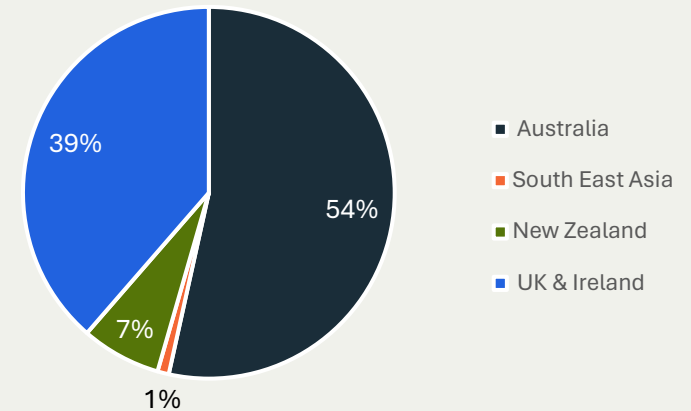
We are a people business, so given the nature of our business, our supply chain largely includes goods and services provided in relation to day-to-day corporate and business operations rather than our service delivery. As a consulting business, our employees constitute by far the largest single cost.

We have a comparatively short and simple supply chain which includes suppliers such as:

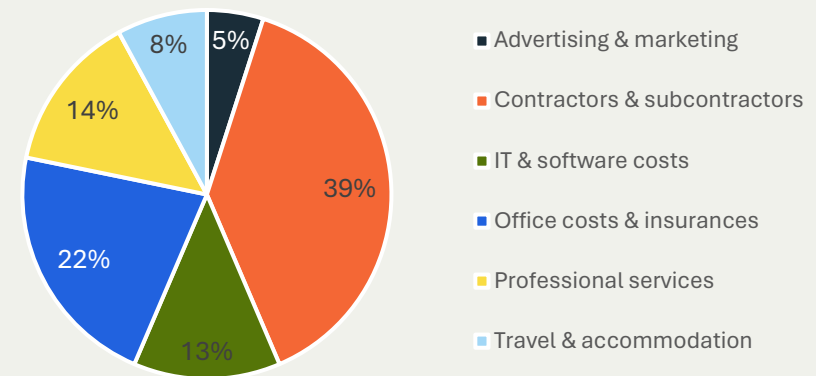
- Advertising & marketing
- Contractors & subcontractors
- IT & software costs
- Office costs & insurances
- Professional services
- Travel & accommodation

Supplier of many of our corporate and business operations are Tier 1 firms or global providers. Business-to-business spend on such suppliers amounted to 16% of our FY24 consolidated income across some 600 suppliers with payments ranging from \$1 to \$1.5m with an average spend of \$45,000.

% direct TSA Riley supplier spend by region



% of TSA Riley spend by sub-category



Governance and consultation

TSA Riley's Board and Group Leadership Team are dedicated to delivering a balanced, sustainable, and resilient strategy for our business. They guide our vision, manage risks, identify opportunities, and address the needs of our people, organisation, and market. The Board and Group Leadership Team are also responsible for approving the strategic direction related to material impacts and sustainability initiatives, ensuring that impact management is seamlessly integrated into our overall business strategy.

Our consolidated approach to preventing modern slavery is achieved through collaboration with key business leaders, including the Chief Executive Officer, Chief Financial Officer, Chief Quality and Risk Officer, and Global ESG Leader, all of whom are part of the Group Leadership Team. The Group Leadership Team includes representatives from all regions of our business, ensuring a comprehensive and cohesive strategy across the organisation.

We engage actively with stakeholders—such as our owned and controlled entities, suppliers, and business partners—to identify and mitigate modern slavery risks. During the reporting period, we engaged and consulted with all companies we own or control in developing this statement (as listed in the Introduction). We discussed the reporting requirements of the *Modern Slavery Act 2018*, shared the actions we plan to take to meet these requirements, and provided relevant materials and updates from our due diligence processes.

Modern slavery risks

TSA Riley's risk of engaging in modern slavery practices or inadvertently procuring services from a supplier who has engaged in modern slavery is considered low. The activities undertaken by TSA Riley have not changed materially over the last year and correspondingly neither have the identified risks even though our geography has expanded. This assessment is based on the following:

Geographical risks

TSA Riley's Head Office is in Australia, and the bulk of our operations are based in Australia, New Zealand, and the UK & Ireland regions with small office (<10 people

employed) in Malaysia with most of our services are also delivered in Australia, New Zealand, and the UK & Ireland. Consequently, the risk exposure to modern slavery, based on the strong rule of law and strong Government action on modern slavery in Australia, New Zealand, and the UK & Ireland is low.

Sector and services risks

TSA Riley provide professional consulting services; we do not produce any products. Our clients comprise government departments, authorities, small to medium sized business, and large corporations many of which have modern slavery policies and prevention processes.

The sector where we provide our services is largely related to the built environment which can often involve complex supply chains and subcontracting, leading to an increase in the risk of labour exploitation, particularly in construction practices and material supply.

Supplier risks

TSA Riley's supplier risks relate to products and services that support our day-to-day business and operational activities. This includes exposure to imported supplier risks such as suppliers with inadequate labour practices or those operating in high-risk regions.

Workforce risks

Our workforce is predominately made up of professionals (engineers, project managers, commercial/ procurement professionals, etc) and the type and complexity of the services we offer to our clients generally prevents the use of unskilled or foreign labour.

TSA Riley provides employees with clear written information about their employment or engagement conditions and wages before they commence their employment; and we conduct checks on individuals' right to work. We rarely operate under awards systems, but commonly rely on common law contracts given most employees are degree qualified and many are members of relevant professional organisation/s. Our standard employment agreements meet all applicable regulation and are routinely assessed against regulation and industry

best practice.






Risk assessment

During the reporting period, we conducted risk assessments to evaluate modern slavery risks within our operations and supply chains. This assessment aimed to identify any risks of causing, contributing to, or being directly linked to modern slavery practices. Utilising the Global Slavery Index 2023 (Walk Free 2023), we reviewed our supply chain highlighting potential areas of vulnerability.

* Definition of involvement

Understanding our potential involvement is crucial for effectively addressing and remediating modern slavery risks or impacts. The table below categorises the ways we might be involved in modern slavery. It describes how we might cause, contribute to, or be directly linked to a risk or impact.

Directly linked	Directly linked to modern slavery through their business relationships, even if we are not directly causing or contributing to it.	Use our leverage to prevent and mitigate the impact.
Contribute	Contribute to modern slavery through our operations or supply chains.	Cease, or prevent, and remediate the contribution.
Cause	Causing modern slavery through our direct actions or policies.	Cease, or prevent, and remediate the impact.

Risk area	Definition of involvement*	Why is it a risk area
 Supplier risk Electronics (e.g. ICT products, devices)	Directly linked Through our wider business relationships	May be produced by low-skilled and low-wage labour, which may include vulnerable workers such as migrant workers or children in artisanal mines. Electronics and ICT products and their components are often manufactured and mined in high-risk countries.
 Supplier risk Branded apparel and marketing merchandise	Directly linked Through our wider business relationships	May be produced by low-skilled and low-wage labour, which may include vulnerable workers in high-risk countries.
 Supplier risk Cleaning services	Directly linked Through our wider business relationships	Prevalence of vulnerable workers, complex subcontracting practices, and economic pressures leading to exploitative labour conditions.
 Supplier risk Food services	Directly linked Through our wider business relationships	Prevalence of vulnerable workers, complex supply chains, and economic pressures leading to exploitative labour conditions.
 Sector and services risk Imported risk related to purchase of solar panels and timber (UK & IRE), construction and cleaning labour.	Contribute Through our clients	Cleaning services and food services are modern slavery risks due to the high prevalence of vulnerable workers, complex subcontracting practices, and economic pressures leading to exploitative labour conditions. Imported risks related to the purchase of solar panels, timber (UK & IRE), and construction and cleaning labour are high due to the potential for forced labour and poor working conditions in these sectors.

Mitigation measures

TSA Riley have the following risk mitigation strategies in place:

- **Grievance mechanisms:** Our grievance mechanisms that allows staff to report concerns anonymously. This mechanism is accessible to all staff with training occurring upon onboarding or when the policy changes.
- **Whistleblowing policies:** Our Whistleblowing Policies confirm our commitment to fostering an environment in which staff can make disclosures about matters of public interest without fear of reprisal. This policy is accessible to all staff with training occurring upon onboarding or when the policy changes.
- **Code of conduct:** Our Code of Conduct sets out the actions and behaviour expected of our people when representing TSA Riley. This code is accessible to all staff with training occurring upon onboarding or when the policy changes.
- **ESG policy:** Our ESG Policy outlines our commitment to acting responsibly across all areas of our operations and strive to create a positive impact through our business operations and the services we deliver. This policy is accessible to all staff with training occurring upon onboarding or when the policy changes.
- **Staff training and communications:** Our company provides modern slavery prevention training to our staff. Currently, this training is available to staff in our Australian region. The training covers modern slavery risks, ethical labour practices, and actions staff can take if they suspect modern slavery in our supply chain or broader community. This training helps build capacity to identify and address potential issues.

Our organisation intranet has a page dedicated to providing our staff information on modern slavery prevention including our latest Statement, latest statistics, related processes, and third-party information.
- **Long-term relationships:** TSA Riley develop long-term relationships with many of its larger suppliers to foster trust and collaboration. We expect our suppliers to comply with their legal obligations in relation to modern slavery and are committed to ensuring there is no modern slavery taking place within their businesses or supply chains.
- **Our portfolio of projects:** Downstream from our direct service offering, the portfolio of projects that we help to deliver is related to the built environment. The built environment sector faces an elevated risk of modern slavery where business models in the long and multi-tiered supply chains within the built environment favours outsourcing, short term engagement, and small to medium enterprises, seasonal arrangements, and a high demand for skilled-based labour conditions (KPMG and Australian Human Rights Commission 2020).

We consult and partner with our clients to help them deliver their projects. This means that we do not have direct procurement or control within our portfolio, however, we do have opportunities to influence and advise. We ensure that Modern Slavery Statements and/ or policy are received from the Principal Contractors on the projects that we help to deliver.
- **Gangmasters & Labour Abuse Authority (GLAA):** Our UK & Ireland region have signed up to the GLAA Construction protocol which is aimed at eradicating slavery and labour exploitation in the building industry. We encourage all our suppliers in this region to commit to raising awareness within the supply chain by agreeing to the GLAA Construction Protocol.

Monitoring and review

TSA Riley have the following monitoring and review strategies in place:

- **Continuous improvement:** TSA Riley completes an annual review update of our policies and practices, including review of our modern slavery risk assessment and methodology, to ensure they remain effective and compliant with relevant legislation.
- **Supplier audits:** Assessments are carried out as part of an annual business review cycle and based on an historical review of business-to-business supplier spend. In assessing the risks of existing suppliers and service providers, TSA Riley has adopted a risk-based methodology in its assessment which includes:
 - an assessment of the service provider and supplier's registered address and domicile, noting that those with a head office in countries with a strong rule of law represent a lower risk;
 - the scale of the spend with service providers and suppliers; and
 - the nature of the services and products being purchased.

Reporting period update

We have received no complaints, enquiries, information to suggest that modern slavery has been identified in our supply chain.

During FY2023-24 we have embedded our employee Modern Slavery training into our Australian compliance training program forming part of our employee onboarding. We will now look to develop and deliver regionally appropriate training for our New Zealand and UK & Ireland region.

Our leadership has endorsed formation of a Responsible Procurement working group during the next reporting period. This working group will be tasked with developing and implementing strategies to ensure our procurement practices align with our commitment to human rights and sustainability.

We have, and continue to, focus on developing a modern slavery prevention approach that applies beyond our Australian that applies to our global operations bringing in our UK & Ireland, Malaysia, and New Zealand operations.

Statement approval

Principal governing body approval

This modern slavery statement was approved by the principal governing body of TSA Riley as defined by the *Modern Slavery Act 2018 (Cth)* (“the Act”) on 14 April 2025.

Signature of responsible member

This modern slavery statement is signed by a responsible member of TSA Riley, as defined by the Act:

A handwritten signature in black ink, appearing to read 'A. Thompson', with a long horizontal stroke extending to the right.

Andrew Thompson
Chief Executive Officer
TSA Riley

Statement annexure

With reference to section 16 of the *Modern Slavery ACT 2018 (Cth)*.

Mandatory Criteria	Page number/s
a. Identify the reporting entity.	Introduction, page 3
b. Describe the reporting entity's structure, operations and supply chains.	About us, page 4 (Our Business, Services and sectors, Where we operate, Supply chain)
c. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Our approach, page 7 (Modern slavery risks, Risk assessment)
d. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Our approach, page 7 (Mitigation Measures)
e. Describe how the reporting entity assesses the effectiveness of these actions.	Our approach, page 7 (Monitoring and Review, Reporting and Transparency)
f. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Our approach, page 8 (Governance and consultation)
g. Any other information that the reporting entity, or the entity giving the statement, considers relevant.	-

TSA Riley

tsariley.com

Australia | Malaysia | New Zealand | United Kingdom | Ireland