Modern Slavery Statement 2025

SLR Consulting Australia Pty Ltd

Prepared by: SLR Consulting Australia

Revision: 1.0

30 June 2026





Contents

1. Introduction 2
2. Reporting Entity 2
3. Our Organisation 3
4. Our Supply Chains 5
    4.1 Supply Chain Overview 5
    4.2 Key Supplier Categories and Risk Exposure 5
    4.3 Geographic Exposure 6
5. Modern Slavery Risk Assessment 7
    5.1 Risk Identification 7
    5.2 Priority Risks 7
6. Managing Modern Slavery Risks 9
    6.1 Relevant Policies and Supporting Procedures 9
    6.2 Due Diligence Processes 10
    6.3 Supplier Monitoring 10
    6.4 Remediation 11
7. Assessing Effectiveness 11
8. Consultation 12
9. Looking Forward 12
10. Approval 12
Annexure A - SLR Consulting Australia Pty Ltd wholly owned subsidiaries 13

1. Introduction

This Modern Slavery Statement is made pursuant to Section 13 of the *Modern Slavery Act 2018* (Cth) (the *Act*) and sets out the steps taken by SLR Consulting Australia Pty Ltd (SLR) during the 2025 reporting period to identify, assess and address the risks of modern slavery practices occurring in SLR's operations and supply chains.

Modern slavery refers to practices where individuals are exploited and deprived of their freedom for commercial gain, including through forced labour, child labour, deceptive recruitment practices, debt bondage and other forms of coercion or abuse within workplaces and supply chains. While SLR operates primarily as a professional services consultancy, SLR recognises that modern slavery risks can arise through the procurement of goods and services, particularly within labour-intensive services, subcontracted activities and goods manufactured through offshore supply chains.

SLR is committed to conducting its business ethically and in accordance with applicable laws and standards. This Statement outlines SLR's current approach to identifying modern slavery risks, assessing their potential impact, managing those risks through proportionate due diligence and monitoring arrangements, and reviewing the effectiveness of those actions over time. It also outlines the governance, supplier management and risk management processes currently used by SLR to support ongoing oversight of modern slavery risks.

SLR recognises that modern slavery risks may evolve over time as operations, supplier relationships and procurement activities change.

2. Reporting Entity

This Statement is prepared by SLR Consulting Australia Pty Ltd (ACN 001 584 612). It covers the operations and supply chains of SLR Consulting Australia Pty Ltd and its wholly owned subsidiaries and controlled entities for the reporting period ending 31 December 2025; these entities are listed in Annexure A.

SLR Consulting Australia Pty Ltd is part of the global SLR Group and is wholly owned by SLR Management Limited (United Kingdom), with Solar Holdings Topco Limited as the ultimate holding company. During the reporting period, SLR's Australian entities operated as an integrated group with shared policies, systems and governance arrangements.

This Statement has been prepared in accordance with the requirements of the Modern Slavery Act 2018 (Cth).

3. Our Organisation

SLR is an independent environmental and advisory consultancy providing professional services across environmental, planning, engineering and related technical disciplines. Services are delivered through multidisciplinary project teams and may involve engagement of external consultants, contractors or specialist service providers where required.

Graph 1: SLR presence in APAC



During the reporting period, SLR employed 827 staff within Australia and 1,107 across all of the Asia Pacific region. The workforce predominantly consists of permanent employees, with limited use of casual staff, and a small proportion of contractors and external consultants engaged on a project-by-project basis.

SLR is committed to maintaining fair and lawful employment practices across its operations. All employees are engaged under formal employment arrangements and are remunerated in accordance with applicable industrial instruments, awards and legislative requirements in Australia. SLR's internal policies and procedures support compliance with workplace laws and are designed to mitigate the risk of modern slavery practices within its direct workforce.

Table 1: Workforce Overview

Location	Permanent	Fixed term	Casual	Contract	Total
Australia	750	5	69	3	**827**
New Zealand	189	3	3	0	**195**
Asia	50	34	1	0	**85**
Total: APAC	**989**	**42**	**73**	**3**	**1107**
Total: Global Corporate	**11**	**0**	**0**	**0**	**11**
Total: APAC + Global Corporate	**1000**	**42**	**73**	**3**	**1118**

SLR's operational footprint is primarily Australia based, with the majority of activities undertaken through office-based and project-driven professional services operations. However, its supply chains extend beyond Australia through the procurement of certain goods and services. This includes office supplies, information technology equipment, personal protective equipment (PPE) and facilities management services, where manufacturing or upstream sourcing may occur in higher-risk jurisdictions.

These procurement activities represent the primary areas of potential exposure to modern slavery risks, particularly where goods are manufactured offshore or services involve subcontracted or labour-intensive activities. Supplier engagement and procurement activities are supported through existing supplier governance and approval processes, including supplier onboarding and review procedures.

4. Our supply chains

SLR engages a range of suppliers to support its operations, corporate functions and project delivery activities. These supply chains include professional services, subcontracted services and procurement of operational goods and services. While many suppliers are Australia based, certain goods and services may involve extended or offshore supply chains where visibility and control may be more limited, and modern slavery risks may be elevated.

4.1 Supply chain overview

SLR's supply chains comprise a mix of professional services, project-related contractors and corporate procurement activities.

Professional services suppliers include specialist consultants, laboratory services and technical contractors engaged to support project delivery. Corporate procurement includes goods and services required to support business operations, such as office supplies, IT hardware and software, PPE and facilities management services. Depending on the supplier category, these goods and services may involve upstream manufacturing, subcontracting or offshore sourcing arrangements.

Suppliers are generally engaged through SLR's established procurement and supplier approval procedures in line with the Global Supplier Code of Conduct. These processes require suppliers to be assessed and approved prior to engagement and through supplier onboarding, review and approval processes aligned with SLR's procurement and supplier governance requirements.

4.2 Key Supplier Categories and Risk Exposure

SLR has identified several key supplier categories within its supply chains. The nature and level of modern slavery risk vary across these categories depending on factors such as the type of goods or services provided, workforce arrangements, geographic sourcing and the complexity of the supply chain

- **Professional and technical services:** These suppliers include specialist consultants, laboratories and technical service providers engaged to support project delivery activities. These services are generally considered to have lower relative risk as they are predominantly professional services based, operate largely within Australia and involve a primarily skilled and directly engaged workforce.
- **Labour-intensive and subcontracted services:** Certain service categories may involve greater reliance on subcontracted or externally managed workforces, including facilities management and operational support services. These arrangements may present higher modern slavery risk exposure due to the labour-intensive nature of the services and potential reliance on subcontracted workforces.
- **Operational goods and corporate procurement:** SLR also procures operational goods and services required to support business activities, including PPE, uniforms, IT equipment and office supplies. Higher relative modern slavery risk may arise where goods are manufactured, assembled or sourced through offshore supply chains, particularly where there may be limited visibility beyond direct suppliers or where sourcing occurs through extended manufacturing and distribution networks.

The level of inherent risk varies across categories depending on factors such as the nature of the goods or services, workforce composition, and the complexity and geographic reach of the supply chain.

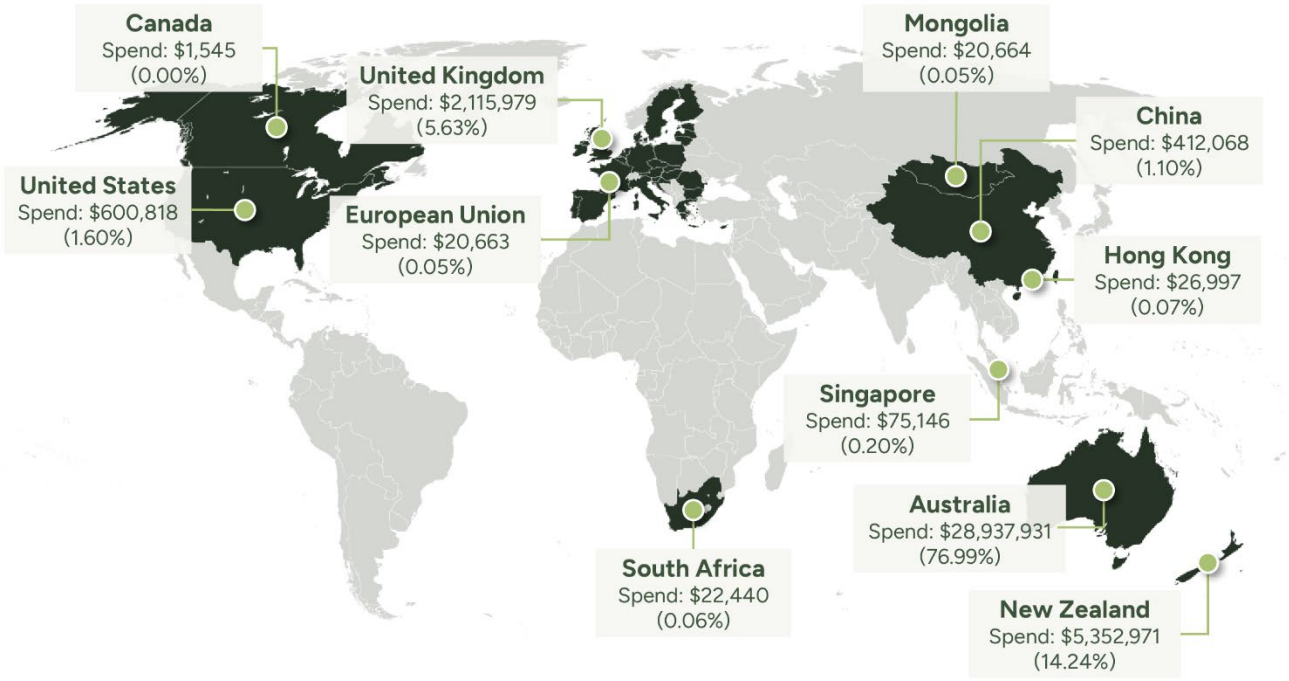
4.3 Geographic Exposure

SLR's direct suppliers are predominantly located in Australia. However, for certain goods procurement categories, including PPE, uniforms, IT hardware and office supplies, manufacturing, assembly or upstream sourcing activities may occur outside Australia through extended supply chains.

In these cases, the geographic location of manufacturing may present a higher inherent risk of modern slavery, even where the supplier is an Australian-based entity. Accordingly, SLR considers both the location of direct suppliers and, where visibility is available, broader upstream sourcing arrangements when assessing modern slavery risk exposure across supplier categories.

SLR also recognises that visibility beyond direct suppliers may be more limited within certain procurement categories, particularly where goods are sourced through multi-tiered manufacturing and distribution supply chains.

Graph 2: Spend by country of origin



5. Modern Slavery Risk assessment

Based on the nature of SLR's operations and supply chains, modern slavery risks are more likely to arise within certain supplier categories, procurement activities and workforce arrangements than within SLR's direct professional services operations. SLR has identified several priority areas of inherent modern slavery risk exposure across its operations and supply chains, informed by factors including labour intensity, subcontracting arrangements, offshore manufacturing exposure, geographic sourcing and supply chain complexity.

5.1 Risk Identification

SLR identifies potential modern slavery risks through consideration of its operations, supplier categories, procurement activities and supply chain characteristics. Risk identification activities are primarily focused on areas where there may be increased exposure to labour-intensive services, subcontracted workforces, offshore manufacturing or extended supply chains.

As part of supplier onboarding and engagement processes, suppliers are assessed through the Supplier Approval Management (SAM) and procurement procedures. These processes include completion and review of a supplier questionnaire and supporting documentation, together with consideration of factors such as supplier type, service offering, geographic location and operational risk profile.

In identifying areas of potential modern slavery risk exposure, SLR considers factors such as, but not limited to:

- the type of goods or services being procured;
- whether services involve subcontracted or labour-intensive workforces;
- whether goods are manufactured or sourced through offshore supply chains;
- the level of visibility available beyond direct suppliers; and
- supplier information obtained through supplier onboarding and review processes.

Risk identification activities are supported through existing supplier governance and procurement processes, including the Global Supplier Questionnaire, supplier onboarding procedures and the Global Supplier Code of Conduct.

5.2 Priority Risks

Based on the nature of SLR's operations and supply chains, SLR has identified several areas where there may be higher inherent exposure to modern slavery risks. These risks are primarily associated with labour-intensive services, subcontracted workforce arrangements and procurement categories involving goods manufactured or sourced through offshore supply chains.

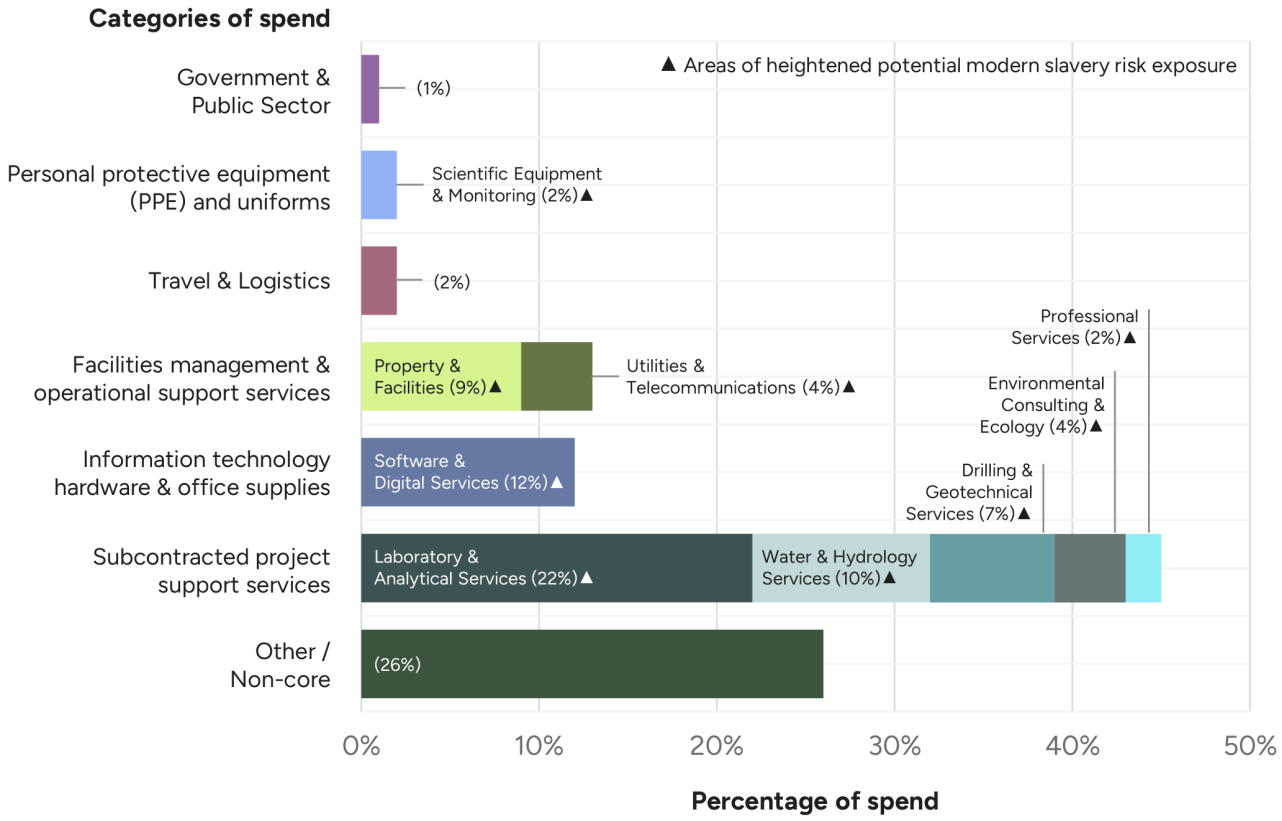
Through its risk assessment, SLR has prioritised supplier categories and procurement activities where these risk factors are more likely to be present. Graph 3 summarises the results of this initial assessment. We will continue to deepen our analysis over the next reporting period to better understand our exposure. These priority areas inform SLR's ongoing due diligence and risk management activities, as outlined in Section 6. The key areas of potential modern slavery risk exposure identified by SLR during the reporting period include:

- **Facilities management and operational support services:** Certain operational support services may involve labour-intensive workforces, subcontracting arrangements or lower visibility across workforce practices. Risks may arise where services rely on outsourced or externally managed labour arrangements.
- **Subcontracted project support services:** Depending on project requirements, SLR may engage specialist subcontractors or technical service providers to support project delivery activities. Risks may arise where subcontracting arrangements reduce visibility over workforce practices or labour conditions.
- **Personal protective equipment (PPE) and uniforms:** PPE and uniforms may be manufactured through offshore supply chains involving multiple tiers of suppliers, manufacturers and distributors. Inherent risks may increase where there is limited visibility across upstream manufacturing and sourcing activities.

- **Information technology hardware and office supplies:** Certain technology equipment and operational goods may involve complex international supply chains and manufacturing processes extending beyond direct suppliers.

While SLR considers the overall risk of modern slavery occurring within its directly employed professional workforce to be relatively lower, SLR recognises that modern slavery risks may exist indirectly through supplier and procurement activities, particularly where goods or services are sourced through extended or offshore supply chains.

Graph 3: Key supplier categories and supply chain structure



6. Managing Modern Slavery risks

SLR manages modern slavery risks through its existing governance, procurement and supplier management processes used across its operations and supply chains. These processes are designed to support supplier oversight, supplier onboarding, approval and ongoing management, procurement governance and ongoing review activities relevant to modern slavery risk exposure.

SLR's approach is primarily focused on supplier governance, procurement controls and supplier onboarding processes, particularly within procurement categories identified as having higher relative modern slavery risk exposure.

6.1 Relevant Policies and Supporting Procedures

SLR maintains a range of governance, procurement and workforce policies and procedures that support management of modern slavery risks across its operations and supply chains. These are intended to support ethical business conduct, supplier governance, workforce management and procurement oversight activities.

Key policies and supporting procedures relevant to modern slavery risk management include:

- **SLR Group Supply Chain Management Framework:** Defines SLR's enterprise-wide supplier governance framework, including supplier categorisation, risk-tiering, review processes, monitoring and reassessment mechanisms. This framework supports disclosure on supplier governance, risk assessment methodology, supplier monitoring, reassessment triggers and effectiveness measures.
- **Supplier Approval Management (SAM) and supplier onboarding procedures:** Suppliers are generally required to complete onboarding questionnaires and provide supporting information prior to engagement. These processes support supplier review, approval and inclusion on SLR's Approved Supplier List and may include consideration of supplier governance, compliance and operational information.
- **Global Supplier Code of Conduct:** Establishes expectations regarding ethical business practices, labour standards and human rights, including prohibitions on forced labour and child labour. Suppliers are required to acknowledge and accept the Supplier Code of Conduct as part of the onboarding and approval process prior to being engaged by SLR.
- **Human Rights Policy:** Outlines SLR's commitment to conducting business in a manner that respects human rights and supports ethical and lawful business practices across its operations and supply chains.
- **Business Conduct Policy and Employee Code of Conduct:** Establish expectations relating to ethical behaviour, lawful conduct and professional standards across SLR's workforce and business activities.
- **Whistleblowing Policy and Procedures:** Provide mechanisms for reporting concerns relating to unethical, unlawful or inappropriate conduct, including concerns potentially relevant to modern slavery risks.
- **HR Policy, recruitment and workforce procedures:** SLR recruits employees directly or through approved recruitment providers and maintains processes intended to support lawful and ethical recruitment practices.

These policies and procedures support SLR's broader supplier governance, procurement and operational risk management activities relevant to modern slavery risk oversight.

6.2 Due Diligence Processes

SLR manages supplier due diligence through its Supplier Approval Management (SAM) system and associated procurement procedures, which are aligned with the SLR Supply Chain Management Framework. Suppliers are required to complete onboarding and approval processes prior to engagement, including completion of the Global Supplier Questionnaire and provision of supporting documentation where required.

The due diligence process follows a risk-based approach, whereby suppliers are categorised based on the type of goods or services provided and their associated risk profile, this may include consideration of factors such as:

- geographic location and sourcing arrangements;
- labour-intensive or subcontracted workforce arrangements;
- supplier governance and compliance information; and
- operational or project-related risk considerations.

This categorisation determines the level of information required and the extent of review undertaken during onboarding.

As part of the supplier approval process:

- Supplier information is collected through tailored questionnaires, with information requirements varying depending on the nature of the supplier and services provided;
- Information provided by suppliers may include details relating to governance, business conduct, human resources, compliance and operational capability;
- Where responses fall outside standard acceptance criteria or relate to higher-risk areas, they may be referred to relevant internal specialists (e.g. quality, health and safety or other functions) for further review.

Suppliers must satisfy SLR's requirements and be approved through SAM prior to being included in the Approved Supplier Database and engaged for work.

Where potential risks, information gaps or non-standard responses are identified, follow-up engagement may be undertaken with the supplier to obtain further information or clarification as part of the approval process.

6.3 Supplier Monitoring

SLR's supplier governance processes include ongoing supplier management and monitoring activities relevant to supplier performance, compliance, and operational engagement. Monitoring activities may vary depending on the supplier category, nature of services provided and level of engagement with SLR operations or projects.

SLR maintains an Approved Supplier List as a key control within its procurement framework. All suppliers engaged for project delivery are required to be approved and included within this system, with contractual arrangements in place. The database records supplier information, including governance, compliance, certification and performance data.

The system is supported by monitoring processes that require suppliers to maintain up-to-date mandatory information (e.g. insurances and certifications). Automated reminders and status controls support timely updates and may restrict supplier approval status where requirements are not met.

Monitoring activities may also include ongoing engagement with suppliers, performance review, management of operational issues and reassessment of supplier arrangements where required.

Supplier governance processes also include mechanisms for escalation of supplier concerns or non-conformance through procurement, quality and operational management channels.

At the time of reporting, SLR's supplier monitoring activities remain primarily focused on direct suppliers and supplier onboarding and management processes, rather than detailed upstream supply chain monitoring.

6.4 Remediation

SLR recognises the importance of responding appropriately where supplier-related concerns or potential issues are identified. Existing supplier governance and incident management processes provide mechanisms for escalation, review and management of supplier performance or compliance concerns where required.

Where concerns are identified, SLR may undertake follow-up engagement with suppliers to obtain additional information, clarify expectations or address identified issues through existing supplier management processes. Depending on the nature of the issue, this may include corrective actions, further review of supplier practices, or escalation through procurement and operational management pathways.

Supplier performance issues may also be identified through ongoing monitoring activities or project-level feedback, which can trigger investigation and review. Where necessary, this may result in reassessment of the supplier's approved status and potential removal from the Approved Supplier List.

SLR also maintains whistleblowing and reporting mechanisms through its Global Whistleblowing Policy and Procedures, which enable employees, contractors and third parties to report concerns relating to unethical or unlawful conduct, including potential human rights issues.

At the time of reporting, SLR has not identified any confirmed instances of modern slavery within its operations. SLR acknowledges that visibility beyond direct suppliers may be more limited within certain procurement categories and recognises the importance of ongoing review and continuous improvement of supplier governance and risk management processes.

7. Assessing effectiveness

SLR assesses the effectiveness of its approach to managing modern slavery risks through existing supplier governance, procurement and operational review processes. As SLR's modern slavery risk management approach continues to develop, SLR recognises the importance of strengthening visibility, oversight and monitoring activities across higher-risk supplier categories and procurement activities.

Current measures are primarily process-based and focus on ensuring consistent application of supplier approval, monitoring and compliance requirements.

Key indicators supporting assessment of effectiveness include:

- supplier onboarding and approval processes undertaken through the Supplier Approval Management (SAM) framework;
- ongoing supplier performance monitoring and evaluation, including identification and management of underperformance;
- existing quality management and operational review processes; and
- internal governance and compliance processes relevant to procurement and supplier management activities.
- maintenance of accurate, up-to-date supplier data and certification status through system-based monitoring and renewal processes; and
- alignment with regulatory and external requirements applicable to SLR's operations.

At the time of reporting, SLR does not maintain a formal standalone modern slavery effectiveness or KPI framework. However, SLR recognises the importance of continuing to strengthen monitoring and oversight activities over time, particularly in relation to higher-risk supplier categories and offshore supply chain exposure.

8. Consultation

In preparing this Statement, SLR consulted relevant internal stakeholders and reviewed internal processes applicable to the entities owned or controlled by SLR and covered by this Statement. During the reporting period, the subsidiary business operations covered by this Statement operated as part of an integrated business structure with shared governance, procurement and supplier management processes.

Consultation undertaken during preparation of this Statement informed the review of supplier governance processes, procurement activities and potential areas of modern slavery risk exposure relevant to SLR's operations and supply chains.

9. Looking Forward

SLR recognises the importance of ongoing review and continuous improvement in managing modern slavery risks across its operations and supply chains.

Future areas of focus may include:

- Enhancing supplier due diligence processes, including exploring more structured and consistent review of supplier modern slavery statements, policies and related disclosures. This may be implemented progressively, with an initial focus on higher-risk and newly onboarded suppliers, and broader application across the supplier base over time.
- Strengthening contractual controls, including the potential incorporation or enhancement of modern slavery provisions within standard supplier terms and conditions.
- Leveraging global governance structures, including the Sustainability Executive Council, to support greater visibility, coordination and alignment of modern slavery risk management approaches across SLR's operations.
- Building internal capability and awareness, including the potential development of targeted modern slavery training and the integration of modern slavery considerations into existing training programs (such as whistleblowing and ethics training).
- Improving supply chain visibility, particularly across higher-risk procurement categories and suppliers beyond Tier 1, where feasible over time.

SLR's approach to modern slavery risk management is expected to continue to develop over time as supplier governance processes, procurement activities and understanding of supply chain risks mature.

10. Statement of approval

This statement was approved by the principal governing body of SLR Consulting Australia Pty Ltd on 30 June 2026.



Paul Wilkinson
Executive Director - APAC

Annexure A - SLR Consulting Australia Pty Ltd wholly owned subsidiaries

Company Name	ACN/Registration number	Status	Employees
NMP Technical Pty Ltd	613 099 540	Non-trading	n/a
KDC Pty Ltd	148 085 492	Non-trading	n/a
360 Environmental Pty Ltd	109 499 041	Non-trading	n/a
Australian Limnological Services Pty Ltd	145 831 554	Non-trading	n/a
FRC Environmental Pty Ltd	72 002895007	Non-trading	n/a
Groundwork Plus Pty Ltd	13 609422791	Trading	11
Groundwork Plus (SA) Pty Ltd	93 642089683	Trading	0
Groundwork Plus Holdings Pty Ltd	44 636259035	Trading	0
Alchemy Growth Partners Pty Ltd	20 114290407	Non-trading	n/a
Astrebla Pty Ltd	651 050 369	Non-trading	n/a
Element Advisory Pty Ltd	097 273 222	Trading	60
SLR Advisory Services Pty Ltd	611 453 126	Trading	n/a
SLR Advisory International Pty Ltd	053 417 799	Trading	n/a
SLR Consulting LLC	5365791	Trading	4
SLR Advisory Asia Limited	1282772	Trading	0
SLR Advisory China Limited	003417717 / 91110105558509594G	Trading	7
PT RPMGlobal Advisory Services	09.03.1.09.61315	Trading	12
SLR Canada Advisory Ltd.	BC1512648	Trading	8
SLR Consulting Turkey Danismanlik Hizmetleri ve Ticaret A.S	408616	Trading	1
SLR Advisory do Brasil Ltda.	07.776.080/0001-10	Trading	n/a

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