

Modern Slavery Statement FY22/23

Tetra Tech International Development Pty Ltd

December 2023

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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 and the Accra Agenda for Action 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 black ink, appearing to read 'Amy Gildea', positioned above the printed name.

Amy Gildea

Managing Director of Tetra Tech International Development Pty Ltd

December 2023

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 practices. 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 issues 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
- » our company structure, operations and supply chains
- » Modern Slavery risks in our operations and supply chains
- » the actions we have taken to assess and address those risks, including due diligence and remediation processes
- » how we assess the effectiveness of such actions
- » our process of consultation with our subsidiary entities, and
- » other information that we consider relevant regarding our efforts to combat Modern Slavery in our operations and supply chains.

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 2023.

This statement was approved by the principal governing body of Tetra Tech International Development on 08 January 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



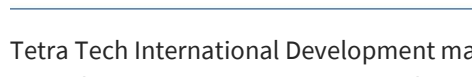
Coffey International Pty Limited

ACN 003 835 112



Tetra Tech International Development Pty Limited

ACN 007 889 081



Tetra Tech International Development 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

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 21,000 staff working across 120 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.

Operations

In FY22/23, 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 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



Agriculture and food security

We support agriculture improvements as a driver of economic growth through technical assistance to actors across the agriculture and agribusiness sectors. To help farmers remain resilient to the effects of climate change, we apply technology solutions to inform them of climate patterns, market prices and advice on crops and soil.



Civil society support

We work with partners to mentor, coach and train civil society organisations to make them stronger, more effective and sustainable. From better collaboration to supporting fairer justice systems or tackling critical health issues – our experts create local ownership and action within civil society organisations.



Climate change and resilience

With 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.



Economic growth, trade and livelihoods

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.



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.



Gender equality, disability and social inclusion

Working closely with our partners, we integrate gender, disability, and social inclusion strategies into our projects, whether in education, governance or security sector reform. We facilitate legislative change, improve government practices, and raise public awareness to foster institutional and social sustainability.



Governance and anti-corruption

We believe in the importance of governmental accountability and integrity, and their responsibility to effectively respond to citizen needs. We provide efficient public service delivery and the transparent use of public funds through the improvement of systems, skills, organisational structures and incentives.



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).



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.



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.



Indigenous participation and livelihoods

Our vision is to have strong and long-lasting relationships with Australian Indigenous communities. Tetra Tech design, deliver, evaluate and transform programs for Commonwealth, State and Territory and local governments, NGOs, universities, foundations and private businesses in Australia and the Indo-Pacific region.



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.

Our supply chain

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

The top ten suppliers:



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

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

Tetra Tech International Development's risk of **causing** Modern Slavery practices both in Australia and internationally is assessed as low.

From an operational perspective, all of Tetra Tech International Development's team members continue to be directly employed and work on contracts under highly visible conditions which are managed by a central Human Resources team. This transparency maintains a low risk profile within our direct teams across both the corporate and project offices. Additionally, as our primary operations are the delivery of management consulting services for the Australian Government, we do not directly engage in high-risk operations.

The risk of Tetra Tech International Development **contributing to** Modern Slavery practices is assessed as low. Although we operate in a high-risk environment, Tetra Tech International Development

implements a robust procurement process which integrates the Commonwealth Procurement Rules, incorporating ethical considerations, risk assessments, and transparency into procurement. This ensures thorough scrutiny of suppliers, mitigating Modern Slavery risks and fostering responsible sourcing practices across the supply chain which increases transparency and promotes a risk-based approach for building our supply chain. There was no evidence to suggest any purchasing practices which could put pressure on suppliers, leading to Modern Slavery.

The risk that Tetra Tech International Development may be **directly linked to** Modern Slavery practises is assessed as medium to high. This rating is attributed to factors including:

- » 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 indicates many of our local suppliers do not have sophisticated capabilities for managing Modern Slavery risks, further aggravating the risk Tetra Tech International Development is directly linked to Modern Slavery practices.

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
Foreign Corrupt Practices Act Policy	Whistleblower 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.

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.

Training and education

Tetra Tech International Development will continue to develop and roll out awareness training and specific procedure-based training for staff who engage with suppliers. This training will be built on the risk data captured for this Statement and be designed to build a better understanding of:

- » industry specific Modern Slavery risks
- » how we review our supply chain and suppliers
- » how we engage with suppliers, and
- » how we monitor for compliance with external obligations and our internal control environment.

Supplier due diligence

As the primary source of Modern Slavery risk lies within our supply chain and in particular 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 SSQ to assess the capability of our suppliers in managing downstream risks.

The questionnaire 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
- » assisting suppliers with modifying their exposure and/or control measures to reduce their level of risk
- » monitor their performance to ensure risks are appropriately controlled.

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

Tetra Tech International Development undertook a review of its risk management resources to determine if they can be enhanced to support management of Modern Slavery risks. Following review, Tetra Tech International Development developed a Modern Slavery Key Risk Indicator assessment to be used by staff where the likelihood of Modern Slavery practices is determined to be high for an activity or program. The assessment 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.

Assessing effectiveness

Tetra Tech International Development will work with all new suppliers regarding Modern Slavery risks.

We will seek to assess the effectiveness of our actions by tracking:

- » the number and percentage of our staff who have attended the required awareness and procedure-based training
- » the number and percentage of suppliers who have accepted our Safeguarding Code of Conduct or implemented their own similar terms
- » the number of suppliers who have completed the SSQ
- » the number of SSQs that have been reviewed and actioned by staff
- » the results of audits conducted on suppliers
- » the results of internal audits conducted to check for our own compliance with requirements
- » whistle-blower reports/complaints relating to Modern Slavery risks or potential breaches of our policy of supplier code of conduct, and
- » the investigations and outcomes of investigations of potential or reported breaches.

As part of our commitment to continuous improvement, we will keep our operational teams abreast of progress on the above which will then be reported to our Executive Leadership Team on a periodic basis.

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.