

The title 'Modern Slavery Statement FY23' is centered on the left side of the page. It is written in a large, white, sans-serif font. The background of the page is a photograph of a modern office meeting room. A man in a checkered shirt stands on the right, holding a yellow sticky note and pointing at a whiteboard covered in other sticky notes. In the background, several people are seated around a table with laptops, engaged in a meeting. The room has large windows and a wooden floor.

Consult  
**Manage**  
Partner

**We manage, consult and partner with our clients to bring impactful projects to life. We are known for our passion, professionalism and collaboration, bringing the right people, processes and experience together to deliver a positive community impact.**

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# Modern Slavery Statement (Australia)

This Statement is published in accordance with section 54(1) of the Modern Slavery Act 2015 (MSA) Modern Slavery Act 2018 (Cth. AU) on behalf of TSA Management Pty Ltd (TSA) operating under the ultimate parent company Crane TopCo Pty Ltd and its wholly owned subsidiaries.

The entity giving this statement is TSA Management Pty Ltd for the Australian fiscal year 2022–2023 (FY23). TSA operates as a privately held company with backing from a private equity investor and has offices in Australia (AU), Malaysia (MY), New Zealand (NZ), Singapore (SG), and the United Kingdom (UK). Our head office is located in Sydney AU.

**This Modern Slavery Statement applies to our AU operations only.**

Our UK operation, which is not covered by this statement, has a Modern Slavery Statement in place and is voluntarily compliant with the relevant Modern Slavery Act 2015 (UK). Additionally, they are signatories to the GLAA (Gangmasters & Labour Abuse Authority) Construction Protocol which is aimed at eradicating slavery and labour exploitation in the building industry.

## 1. About Us

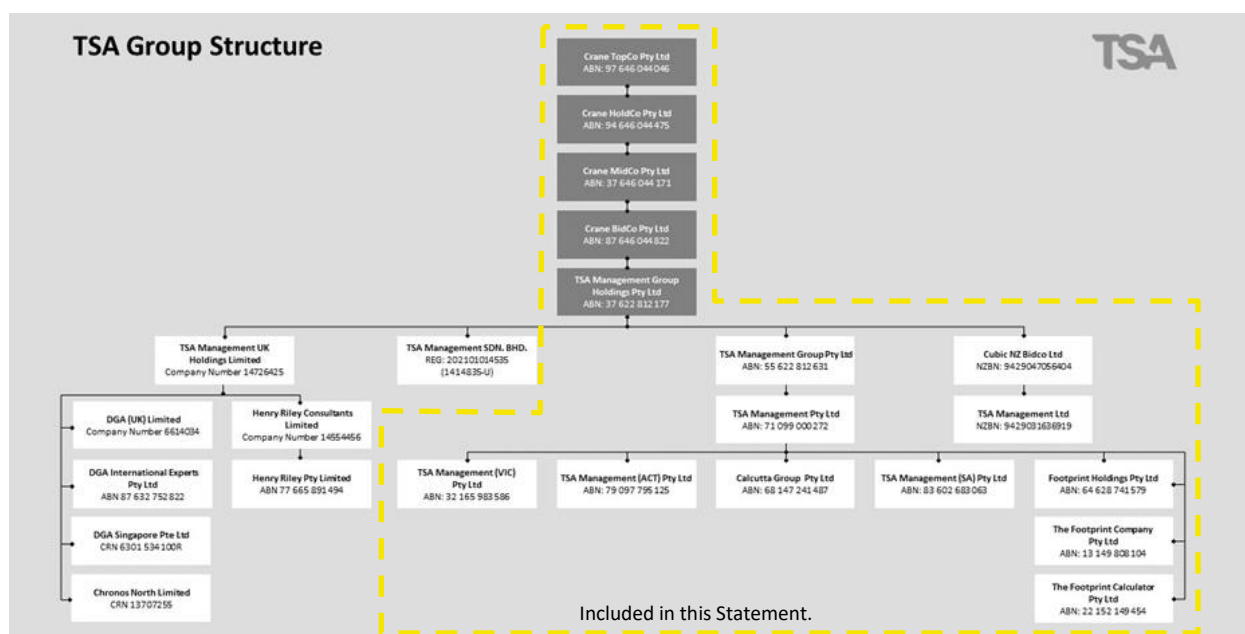
TSA Management (TSA) specialises in providing independent, tailored solutions for complex projects across a range of property and infrastructure sectors for government, private and not-for-profit clients. With experience spanning over 20 years, TSA has a proud company record and invaluable depth of industry knowledge.

We are a group of people who manage, consult and partner with industry professionals to radically improve public and private utilities and infrastructure through projects both big and small. Sometimes we help build, other times we advise. We always collaborate for an outcome with positive impact.

Our Mission is to deliver projects of significance leaving a positive legacy for those who live in the communities we create.

TSA works across the full lifecycle of challenging projects offering a unique combination of project management and advisory services across a broad and expanding range of sectors and industries.

Our systems, processes, and procedures are adaptive to individual client needs and compliant with corporate governance and regulatory requirements. Scalable and flexible, these systems allow TSA's people to work effectively with small businesses, large corporations, and government departments across a diversity of projects.



## 1.1 Our Services.

Sometimes we help build, other times we advise.

Under two distinct but complementary service offerings (TSA Projects and TSA Advisory), our people manage, consult and partner with clients to bring impactful projects to life. The TSA Projects team specialises in project and program management, while TSA Advisory offers advisory services, development, and procurement management. TSA is uniquely positioned to draw on any configuration of TSA Projects and TSA Advisory members to form optimal teams for project success.

## 1.2 Where we operate.

We saw large growth in our business during FY23. We ended FY22 with a headcount of 550 people and ended FY23 with a headcount of 920.

In 2023 we acquired businesses with head offices in the United Kingdom which has expanded our primary areas of operation to the United Kingdom and Singapore.



## 1.3 Sectors.

TSA operate in a wide range of sectors, both public and private including:

- |  |  |  |                         |  |                               |  |                          |
|--|--|--|-------------------------|--|-------------------------------|--|--------------------------|
|  | <b>Aged care and retirement living</b> |  | <b>Arts and Culture</b> |  | <b>Energy &amp; Resources</b> |  | <b>Health</b>            |
|  | <b>Defence</b>                         |  | <b>Education</b>        |  | <b>Ports and Logistics</b>    |  | <b>Rail</b>              |
|  | <b>Hospitality</b>                     |  | <b>Justice</b>          |  | <b>Road</b>                   |  | <b>Sports and Stadia</b> |
|  | <b>Residential and Urban Growth</b>    |  | <b>Retail</b>           |  | <b>Utilities</b>              |  |                          |
|  | <b>Aviation</b>                        |  | <b>Commercial</b>       |  |                               |  |                          |

## 2. Our Approach

TSA is committed to adopting best practices to combat modern slavery and human trafficking through its policies and practices. We are committed to acting ethically and with integrity in all business dealings and relationships and to ensuring that its business operations are free from involvement in modern slavery.

### 2.1 Supply Chain and Modern Slavery Risks.

#### 2.1.1 Our 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 of IT equipment, photo copiers, office equipment, plants and furniture, stationery, and local cleaning (usually part of our lease agreements), travel and catering services. The provision of professional services, insurance, and computer software packages in support of our corporate and business operations are provided by Tier 1 firms or global providers. Business-to-business spend on such suppliers amounted to 23% of our FY23 consolidated income across some 400 suppliers with payments ranging from \$1 to \$1.6m with an average spend of \$75,000.

#### 2.1.2 Our modern slavery risks.

TSA'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 have not changed materially over the last year and correspondingly neither have the identified risks. This assessment is based on the below risk analysis:

##### **Geography.**

The bulk of the TSA operations are based in AU, NZ, and the UK with small offices (<12 people employed in each) in Malaysia and Singapore. Our presence in South Africa relates to one person on sub-consultancy agreement. Most of our services are delivered in AU and NZ and UK. Consequently, the risk exposure to modern slavery, based on the strong rule of law and strong Government action on modern slavery in AU, NZ, and the UK is low.

##### **Our Services.**

TSA provide consulting services and we do not manufacture any products. Our clients comprise both Commonwealth and State government departments, authorities, and small to medium sized business, and large corporations many of which have modern slavery policies.

##### **Our People.**

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

TSA 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.

We undertook risk assessments of modern slavery risks in our operations and supply chains over the reporting period to consider the risk that we are causing, contributing, or directly linked to modern slavery practices.

Using The Global Slavery Index 2023 (Walk Free 2023) TSA reviewed our supply chain and identified the highest risk industries we connect with whom present potential areas of vulnerability in our operations:

Area	Modern Slavery Risk Indicator	High Risk Supply
Business Operations	Imports of products at risk of modern slavery	Garments (i.e., PPE & marketing collateral), IT hardware
Business Operations	High risk geographies	Philippines

## 2.2 Governance and Policy.

TSA’s Group Board is ultimately accountable for managing risk including modern slavery, whilst the Executive Boards and regional and functional leaders are accountable for overseeing risk management.

TSA has in place a range of business policies and approaches which are relevant to the prevention of modern slavery and compliance with the Modern Slavery Act 2018 (Cth AU). These include:

### Modern Slavery Policy (AU).

This policy details our commitment to adopting best practice to combat modern slavery and human trafficking through our policies and practices. We are commitment to acting ethically, and with integrity, in all business dealings and relationships to ensure that its business operations are from involvement in modern slavery. Our Policy is reviewed annually.

### Other Policies.

Our internal policies protect the working rights of our people. We are committed to providing equal opportunity, safe working conditions, and fair working practices.

### Environment, Social and Governance (ESG) Steering Committee, ESG Policy and ESG Framework.

The responsibility for compliance with the Modern Slavery Act 2018 (Cth AU) sit within the remit of our ESG Steering Committee.

The ESG Steering Committee has been entrusted by the Chief Executive Officer (CEO) with the task of managing TSA's Modern Slavery Policy implementation and the Modern Slavery Statement.

### Ethics and Integrity Committee.

As a sub-committee of the TSA Group Board, involving the Group Board Chairman and key Executive Directors, the Ethics and Integrity committee is responsible for ensuring that our engagements and interactions are consistent with the agreed values and ethics.

### Whistleblowing Policy and Grievance Handling process.

TSA is committed to fostering an environment in which Staff can make disclosures about matters of public interest without fear of reprisal.

While our people are encouraged to in an open, two-way communication with their people manager and the leadership team, our Whistleblowing Policy and grievance procedure outlines our policy and mechanisms, including confidentiality and anonymously, and process for our people to raise concerns with appropriate protections, support, and fair treatment.

## 2.3 Actions and Effectiveness – Business Operations.

### 2.3.1 Consultation.

The ESG Steering Committee is responsible for managing TSA's modern slavery policy implementation and the Modern Slavery Statement. The Modern Slavery Statement is endorsed by the Chief Executive Officer and referred to our Executive and Group Boards. Our employees are trained in modern slavery prevention, and we have mechanisms for whistleblowing, grievance handling.

Further, the ESG Steering Committee engages with the Regional General Managers across the key geographies to ensure that there is alignment on supplier engagement and Modern Slavery compliance checking.

We do not own or control any other AU entities that require consultation.

Also refer **2.2.1 Training** and **2.2.3 Grievance and Critical Concerns**.

### 2.3.2 Due Diligence.

The ESG Steering Committee has the responsibility for assessing the effectiveness of the measures put in place via a review of suppliers used by TSA. Assessments are done as part of an annual business review cycle and based on a historical review of business-to-business supplier spend.

In assessing the risks of existing suppliers and service providers, TSA 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.

TSA will conduct an annual review of our modern slavery risk assessment and methodology.

### 2.3.3 Employee Training.

To cultivate a comprehensive comprehension of the risks associated with modern slavery and human trafficking in both our business and supply chains, we offer online training courses to all our personnel as part of our annual mandatory compliance training and refresher programs for all employees. This strategic approach guarantees that all employees are well-informed about this critical matter.

In Modern Slavery prevention training was made mandatory for all employees in AU and, moving forward, the training has been incorporated into the employee onboarding program to ensure all new AU employees complete the training.

### 2.3.4 Issue Handling.

Any issues found are dealt with by the ESG Steering Committee and raised to Executive Board and Group Board level for any escalation required, via the appropriate channels. Issues are referred to the Ethics and Integrity based on a needs assessment.

## 2.4 Our FY23 Performance.

Our monitoring and assessment process is developing, and the focus of this first reporting period has been to develop the groundwork to be able to monitor the effectiveness of our actions to detect and mitigate risks of modern slavery in our operations and supply chain.

A Monitoring Audit and Risk Assessment was undertaken for FY23. For our AU operations, four suppliers were reviewed. No critical concerns related to Modern Slavery were identified.

## 2.5 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.

## 2.6 Future commitments.

In FY24 we aim to:

- continue to develop the maturity of our vendor selection by reviewing and updating our business operations procurement guide and policy.
- implement processes to undertake further due diligence verifications on our portfolio of projects.



### 3. Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of TSA Management Pty Ltd as defined by the *Modern Slavery Act 2018* (Cth) (“the Act”) on the 12 December 2023.

#### Signature of Responsible Member

This modern slavery statement is signed by a *responsible* member of TSA Management Pty Ltd as defined by the Act:

Signed:



Andrew Tompson  
Chief Executive Officer and Director

Date: 12 December 2023

#### Statement Annexure

Reference to page number/s of statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Section number/s
a) Identify the reporting entity.	Page 3
b) Describe the reporting entity’s structure, operations and supply chains.	1 About Us 2 Our Approach
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.	2.1 Supply Chain and Modern Slavery Risks.
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.	2.2 Governance and Policy. 2.3 Actions and Effectiveness – Business Operations 2.6 Future commitments.
e) Describe how the reporting entity assesses the effectiveness of these actions.	2.3 Actions and Effectiveness – Business Operations 2.4 Our FY23 Performance.
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).*	2.3.1 Consultation.
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	2.5 Our portfolio of projects.

# Best for Project

## AUSTRALIA

SYDNEY | ADELAIDE | BRISBANE | CANBERRA | DARWIN  
MELBOURNE | NEWCASTLE | PERTH | PARRAMATTA

## NEW ZEALAND

AUCKLAND | CHRISTCHURCH | TAURANGA  
WELLINGTON | QUEENSTOWN

## MALAYSIA

KUALA LUMPUR

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# TSA