



# MODERN SLAVERY STATEMENT

## 2023 Financial Reporting Year

Tetra Tech Holdings Pty Limited (ACN 623 346 225)

NDY Holdings Pty Limited (ACN 002 589 693)



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## INTRODUCTION

This Modern Slavery Statement outlines the actions Tetra Tech Holdings Pty Ltd has taken to address the risks of modern slavery in its operations and supply chain. It has been prepared in accordance with the requirements of Australian legislation, Modern Slavery Act 2018 (Cth) (the "Act") and covers the financial year ended 1 October 2023.

Tetra Tech Holdings Pty Ltd and NDY Holdings Pty Ltd are each required to submit a modern slavery report and make this joint submission.

## ORGANISATION STRUCTURE

This statement relates to Tetra Tech Holdings Pty Ltd (ACN 623 346 225) (Tetra Tech Holdings, we, us), and all its Australian subsidiaries which are NDY Holdings Pty Ltd (ACN 002 589 693), NDY Management Pty Ltd (ACN 003 234 571), Engineering Commissioning Services Pty Ltd (ACN 150986799), NDY ICS Pty Ltd (ACN 089 674 420), NDY Holdings (NZ) Ltd (NZCBN 1934886)

Tetra Tech Holding Pty Ltd, is wholly owned by Tetra Tech Inc (Org No 112 443 599) (Tetra Tech) which has its headquarters in the California, United States of America.

ENTITY	STRUCTURE	SUBSIDIARIES	REGISTERED OFFICE	COMPANY IDENTIFIER
<b>Ultimate Parent Company</b>				
<b>Tetra Tech Inc.</b>	US listed entity	Tetra Tech Holdings Pty Ltd	Pasadena, CA, United States	Org No 112 443 599
<b>Reporting Entity</b>				
<b>Tetra Tech Holdings Pty Ltd</b>	Australian private company	NDY Holdings Pty Ltd	North Sydney, Australia	ACN 623 346 225
<b>Subsidiary Entities</b>				
<b>NDY Holdings Pty Ltd</b>	Australian private company	NDY Management Pty Ltd Engineering Commissioning Services Pty Ltd NDY ICS Pty Ltd NDY Holding (NZ) Ltd NDY International Pty Ltd**	North Sydney, Australia	ACN 002 589 693
<b>NDY Management Pty Ltd</b>	Australian private company	Nil	North Sydney, Australia	ACN 003 234 571
<b>Engineering Commissioning Services Pty Ltd</b>	Australian private company	Nil	North Sydney, Australia	ACN 150 986 799
<b>NDY ICS Pty Ltd</b>	Australian private company	Luminova International Pty Ltd**	Melbourne, Australia	ACN 089 674 420
<b>Luminova International Pty Ltd</b>	Australian private company	Nil	Melbourne, Australia	ACN 138 823 695

ENTITY	STRUCTURE	SUBSIDIARIES	REGISTERED OFFICE	COMPANY IDENTIFIER
<b>NDY Holdings (NZ) Ltd</b>	NZ Limited Company	Norman Disney & Young Limited	Auckland, New Zealand	NZCBN 1934886
<b>Norman Disney &amp; Young Limited</b>	NZ Limited Company	Nil	Auckland, New Zealand	NZCN 336379

\*Many subsidiaries around the world belong to Tetra Tech Inc, including 29 that are based in Australia.

\*\* Company is not actively trading

## OPERATIONS

### TETRA TECH HOLDINGS

Tetra Tech Holdings is a holding company which operates through its subsidiaries, NDY Holdings Pty Ltd.

### NDY HOLDINGS PTY LTD

NDY Holdings Pty Ltd is a holding company which operates through its subsidiaries NDY Management Pty Ltd (ACN 003 234 571), Engineering Commissioning Services Pty Ltd (ACN 150 986 799), NDY ICS Pty Ltd (ACN 089 674 420) and NDY Holdings (NZ) Ltd (NZ CBN 1934886).

### NDY MANAGEMENT PTY LTD

NDY Management ("NDY") is a consulting engineering firm that works with clients worldwide in the construction and property sectors, covering various market segments.

The main services that NDY offers to these clients are engineering design or reporting services. NDY collaborates with clients to create documentation that helps them achieve their project goals. To do this, NDY works alongside other design professionals such as architects, planners, structural engineers, civil engineers, cost consultants (quantity surveyors), project managers and other professionals the client hires.

The engineering services NDY provides include:

Acoustics	Asset performance	Audio visual
Commissioning management	Building information modelling (BIM)	Communications (ICT)
Electrical	Controls & integration	Fire engineering
Interiors	Fire protection	Hydraulics
Mechanical	Lighting	Property consultancy
Smart buildings	Structural & civil	Security
Vertical transportation	Sustainability	

NDY directly employs engineers to provide the services, as well as staff who support the delivery of the services, including finance and treasury functions, marketing and business development, legal and administration support as well as information technology and software development. NDY also uses suppliers who offer assorted services to support the NDY operations, such as administration, engineering, legal, information technology, cleaning, insurance, property leasing and financial.

### ENGINEERING COMMISSIONING SERVICES PTY LTD

The main objective of commissioning is to affect the safe and orderly handover of the asset from the constructor to the owner, ensuring its operability in terms of performance, reliability, safety, information traceability, energy consumption and maintainability in accordance with required standards.

The importance of effective commissioning management cannot be overestimated. Yet despite this, it is not always carried out as effectively as it should be. Effective commissioning is an essential factor in delivering facilities that provide optimal occupant comfort, low energy consumption and the resultant low carbon footprint.

Engineering Commissioning Services has significant experience acting as commissioning managers. The commissioning managers are registered with the Commissioning Specialist Association and are responsible for the delivery of many prestigious projects ranging from highly technical mission critical facilities to multi-use projects across many market sectors.

Consulting services offered include:

Independent Commissioning Agent	Engineering Inspection and Reporting
Commissioning Management	Witness Testing
Building Tuning	

### NDY ICS PTY LTD

NDY ICS is a non-trading entity which provides management support services to NDY Management Pty Ltd.

### NDY HOLDINGS (NZ) LTD

NDY Holdings (NZ) Ltd is a holding company which operates through its subsidiaries Norman Disney & Young Limited (NZCN 336379).

### NORMAN DISNEY & YOUNG LIMITED

Norman Disney & Young Limited is operates in the same manner as NDY Management Pty Ltd.

## WORKFORCE

Tetra Tech Holdings Pty Ltd operates in Australia and New Zealand through leased offices in Adelaide, Brisbane, Canberra, Melbourne, Perth, Sydney, Auckland and Wellington. Across these locations, over 600 people are employed, as outlined below:

ENTITY	EMPLOYEE NUMBERS AND EMPLOYMENT TYPE
<b>Tetra Tech Holdings Pty Ltd</b>	0
<b>NDY Holdings Pty Ltd</b>	0
<b>NDY Management Pty Ltd</b>	22 Casual employees 105 Fixed term employees 329 Full time employees
<b>Engineering Commissioning Services Pty Ltd</b>	1 Casual employee 2 Fixed term employees 11 Full time employees
<b>NDY ICS Pty Ltd</b>	1 Casual employee 8 Fixed term employees 32 Full time employees 3 Part time employees
<b>Luminova International Pty Ltd</b>	0
<b>NDY Holdings (NZ) Ltd</b>	0
<b>Norman Disney &amp; Young Limited</b>	6 Casual employees 1 Fixed term employees 75 Full time employees

## ENTITY

## EMPLOYEE NUMBERS AND EMPLOYMENT TYPE

4 Part time employees

**Casual employees** are non-permanent employees engaged under an enterprise award with minimum rates of pay and allowances for base-skilled administrative work.

**Fixed term employees** are engaged for a defined term with a specified end date for project-related work.

**Part time and full-time employees** are engaged on a permanent basis and may be employed in a full time or part time capacity.

## SUPPLY CHAIN

Through its subsidiaries, Tetra Tech Holdings collaborated with approximately 500 suppliers during the reporting period. Most of these organisations were based in Australia, at 96%, followed by 1.4% from the USA, 1.1% from the UK, and the remaining suppliers were from Canada, India and the Philippines. In terms of expenditure, 69.4% occurred in Australia, followed by 10.7% in the USA, 12% in the Philippines and 7.2% in India.

The main services provided to Tetra Tech Holdings and its subsidiaries, ranked by spending, were sub-contractor professional services (38%), intercompany professional services (25%), local government services (15%), vendor services (8%), rent (6%), insurance (3%), recruitment (2%), financial services (1%) and transportation (1%).

26% of total spending on professional services from sub-contractors (68% of the sector spending) is attributed to 6 suppliers. These suppliers provide distinct types of services, such as engineering (18.9%), administration (4.9%) and architecture (2.2%). These suppliers are divided into two groups: one group has a long-term relationship with us (18.3% of total spend), while the other group has a fixed term contract related to specific client engagement (7.7% of total spend).

## RISKS

We know that our business of professional consulting engineers based in Australia and NZ is less likely to encounter modern slavery practices than other companies that work in blue-collar sectors or have more casual workers in countries with higher risks, but we also recognise the importance of our role in tackling modern slavery.

The scope and nature of professional services undertaken by subsidiaries of Tetra Tech Holdings, whilst servicing clients in the property and construction industry, we are not directly involved in the building, cleaning, or maintaining the physical final product.

Subsidiaries of Tetra Tech Holdings conduct a supply chain screening annually to monitor for the risk of modern slavery in our supply chain and determine if there are any major suppliers who present a medium or high-risk which warrant further action.

For our own activities, we recognise courier and transportation have greater risks as do services provided under our leases, such as cleaning services. Our sub consultant service providers also present risk associated with their geographical location, and we focus our monitoring into the main providers in this area.

## ACTIONS TAKEN

During the reporting period, NDY undertook various actions to assess and address modern slavery risks in our business.

## SUPPLY CHAIN SCREENING

An assessment was conducted of NDY's total spend during the reporting period. Out of all suppliers, there were **61 suppliers who were responsible for up to 90% of the aggregate spend** during the reporting period.

These 61 suppliers were evaluated to calculate an overall risk score. Based on their materiality and in terms of the following risk factors:

- Percentage of spend – which places great emphasis and focus on service providers who are our main trading partners, which directly correlates to our ability to influence their decision making.
- Country Risk – which considers the prevalence of modern slavery in the country of the service provider, which has been based on the Global Slavery Index.

- Industry risk – which considers the prevalence of modern slavery in the type of service provided by the service provider, which has been based on the Responsible Sourcing Tool.

The evaluation identified zero suppliers as high risk, 36 suppliers were medium risk, 25 suppliers were low risk.

## SUPPLIER ENGAGEMENT

We have various ways to engage with our main suppliers who pose medium risks, such as our major sub consultants, to check for any signs of modern slavery, such as:

- Working together on resourcing levels to make sure they have sufficient staff for the work demands.
- Working together on work process and improvements to help deliver better outcomes.
- Sharing workload forecast to anticipate resource gaps.
- Frequent on-site meetings between our senior leaders and various levels of their employees.
- Frequent collaboration on project tasks between employees at various levels of both organisations.

Also, these key suppliers are asked to complete an annual survey where they can report any issues, potential or actual, so we can cooperate to lower the risk in the future. This helps us and our suppliers to improve our combined awareness of general social and modern slavery risks and take actions to address risk in our mutual supply chain.

## POLICY

New staff receive the following policies, which help to deal with modern slavery risks, and all staff can access them on our intranet at any time:

- Modern Slavery Policy,
- Supplier Code of Conduct,
- Whistleblower Policy,
- Anti-Corruption Policy,
- Code of Conduct,
- Ethical Statement,
- Workplace Behaviour Policy.

Standard sub consultancy agreements used to engage suppliers and sub consultants are used which include requirements for compliance with Australian laws, our policies, codes, and procedures including modern slavery requirements.

## TRAINING

New employees are assigned relevant training in Modern Slavery which explains what modern slavery is, where it happens, our commitment, what our business risks are, how to spot modern slavery and what to do if they suspect modern slavery is occurring. The training also asks staff to acknowledge that they have been provided with and read the modern slavery statement.

Employees are assigned the Ethics and Code of Conduct training upon commencement of employment and is also required to be re-completed every two years thereafter. 100% completion rate was achieved in 2023.

## GRIEVANCE MECHANISMS

Employees and suppliers are encouraged to report any actual or suspected instances of unethical conduct, including modern slavery issues, in a timely manner.

In accordance with its Whistleblower Policy, Tetra Tech Inc has established an anonymous 24-hour-a-day Ethics Hotline and anonymous online reporting portal to enable employees to raise concerns about behaviour and incidents that may be in breach of corporate policies, including the Code of Conduct.

No instances of modern slavery issues were reported on during this period.

## ASSESSMENT OF EFFECTIVENESS

Our Modern Slavery working group reports to the broader ESG Committee and meets regularly to review progress towards key activities to addressing modern slavery. During this reporting period the working group undertook the following:

- Annual review and monitoring of compliance with the Act including reporting the leadership and external bodies.
- Annual review of related policy and procedures, including Code of Conduct and Ethical Statement.
- Shared our Modern Slavery statement for 2022 with all staff and external stakeholders.
- Provided all staff with refresher and awareness training via town hall presentation sessions on Modern Slavery policies.
- Annual review of purchasing data to identify any high-risk suppliers.

## CONSULTATION ACROSS OUR GROUP

The businesses in Tetra Tech Holding are a combination of businesses that have many resources and policies in common, as well as a shared supply chain. The division of businesses is based on history and shows how the business has changed over time. A Modern Slavery Work Group is in charge of consulting with the relevant businesses that are owned or controlled by the reporting business and reports to the ESG Committee which has representatives from the different businesses.

## APPROVAL

This Modern Slavery Statement has been reviewed, approved, and endorsed by Stuart Fowler in his role as Director of both Tetra Tech Holdings Pty Limited and NDY Holdings Pty Limited on 25 March 2024 for the financial year ending 1<sup>st</sup> October 2023.

Director resolution confirming permission to submit this Modern Slavery Statements for Tetra Tech Holdings Pty Ltd and NDY Holdings was agreed by all Directors.

A handwritten signature in blue ink, consisting of a stylized 'S' and 'F' followed by a horizontal line.

Stuart Fowler  
Chief Executive Officer

## NDY, A TETRA TECH COMPANY | CONSULTING ENGINEERS

NDY Management Pty Limited trading as NDY, A Tetra Tech Company  
ABN 29 003 234 571  
90 Arthur Street  
North Sydney NSW 2060  
Telephone: +61 2 9928-6800  
Facsimile: +61 2 9955-6900

## OFFICES

Australia:	Sydney, Melbourne, Brisbane, Perth, Canberra, Adelaide, Gold Coast
Canada:	Vancouver
Ireland:	Dublin
New Zealand:	Auckland, Wellington
United Kingdom:	London

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## NDY QA SYSTEM

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# CONTACT US

## AUSTRALIA

### ADELAIDE

T: +61 8 8290 6800  
E: adelaide@ndy.com

### BRISBANE

T: +61 7 3120 6800  
E: brisbane@ndy.com

### CANBERRA

T: +61 2 6295 1788  
E: canberra@ndy.com

### GOLD COAST

T: +61 7 5512 1235  
E: goldcoast@ndy.com

### MELBOURNE

T: +61 3 9862 6800  
E: melbourne@ndy.com

### PERTH

T: +61 8 9281 6800  
E: perth@ndy.com

### SYDNEY

T: +61 2 9928 6800  
E: sydney@ndy.com

## CANADA

### VANCOUVER

T: +1 604 734 9338  
E: vancouver@ndy.com

## NEW ZEALAND

### AUCKLAND

T: +64 9 307 6596  
E: auckland@ndy.com

### WELLINGTON

T: +64 4 471 0151  
E: wellingtonadmin@ndy.com

## UNITED KINGDOM

### LONDON

T: +44 20 7553 9494  
E: london@ndy.com

## IRELAND

### DUBLIN

T: +353 1 264 6995  
E: dublin@ndy.com

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