

# MODERN SLAVERY POLICY

**NDY Policy & Procedure** 

CONFIDENTIAL

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# 1 INTRODUCTION

# 1.1 PURPOSE

Modern slavery is a crime and a violation of fundamental human rights. NDY does not tolerate the existence of modern slavery in its business or supply chain.

This policy sets out the process by which NDY will strive to ensure there is no modern slavery present in its business or supply chain and the manner in which employees of NDY can report any suspected instances of modern slavery.

# 1.2 SCOPE

This policy applies to all permanent Norman Disney & Young (NDY) employees.

# 2 DEFINITIONS

# 2.1 WHAT IS MODERN SLAVERY

Modern Slavery is as defined in accordance with any applicable legislation in the various regions in which we operate.

However generally, modern slavery could encompass any or all of the following conduct: servitude, child labour, forced labour, human trafficking, debt bondage, forced marriage, deceptive recruitment for labour or services, and other conduct as defined by applicable legislation from time to time.

# 3 ADDRESSING MODERN SLAVERY

# 3.1 REVIEW OF SUPPLY CHAIN

In accordance with applicable legislation in the areas in which we operate, NDY will conduct any required audits of our supply chain to try and eliminate modern slavery practices if found.

# 3.2 MODERN SLAVERY STATEMENT

In accordance with applicable legislation in the areas in which we operate, NDY will publish any required statements or notifications in relation to our efforts to address modern slavery in our business or supply chain.

# 3.3 PROHIBITION ON ENGAGING IN CERTAIN CONDUCT

All employees of NDY must not engage in any conduct which would amount to a breach of any applicable modern slavery legislation in the region they work in.

# 3.4 REPORTING MODERN SLAVERY

All employees of NDY are responsible for being alert to any modern slavery practices that they may become aware of in our business or supply chain.

If any employee reasonably believes or suspects that modern slavery may be present in our supply chain or business, they must notify the Director People & Culture, or NDY's General Counsel, as soon as possible.



# 3.5 TRAINING

All employees of NDY will have access to e-learning on understanding what modern slavery is, ways to spot modern slavery, and how to report modern slavery. It is each employee's own responsibility to notify their manager if they are unable to completed or access this training so that alternative options can be made available for them.

# 4 ASSOCIATED POLICIES

# 4.1 ASSOCIATED POLICIES

This Policy should be read in conjunction with:

- Anti-Corruption Policy
- Code of Conduct
- Grievance Policy
- Disciplinary Policy & Procedure
- Ethical Statement
- Workplace Behaviour Policy
- Code of Employee Conduct Policies (Tetra Tech)
- Combating Trafficking in Persons Policy (Tetra Tech)
- Foreign Corrupt Practices Act Policy (Tetra Tech).

# NORMAN DISNEY & YOUNG | CONSULTING ENGINEERS

NDY Management Pty Limited trading as Norman Disney & Young

ABN 29 003 234 571 80 Collins Street

Melbourne Victoria 3000 Telephone: +61 3 9862 6800 Facsimile: +61 3 9862 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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LinkedIn: www.linkedin.com/company/norman-disney-&-young

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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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