

# MODERN ANTI-SLAVERY COMPLIANCE STATEMENT



This statement focuses specifically on Norman Disney & Young's (NDY) compliance with the various modern anti-slavery acts that exist in the regions in which we operate.

This statement highlights the steps we are taking to help ensure there is no slavery or human trafficking occurring within NDY or its supply chains. NDY is an engineering design consultancy firm, which is part of the Tetra Tech group of companies. NDY has an Australian Head Office as well as offices in London, Vancouver, Hong Kong, New Zealand and major Australian cities. NDY currently employs around 650 individuals. NDY's suppliers include suppliers of administrative labour and CAD design, as well as relevant local suppliers of facilities management services, transport such as airlines, legal and accounting firms, and insurance and recruitment agencies.

## POLICIES

We intend to conduct a review of our employee-related policies to alert all staff specifically to modern slavery issues, and how to raise any known or suspected concerns. These policies are available on our intranet for any staff member to access at any time. This also includes our Anti-Corruption Policy, Grievance Policy, and Whistle-blower Policy. In addition, employees of NDY are required to comply with Tetra Tech policies which include a Combating Trafficking in Persons Policy and Foreign Corrupt Practices Act Policy. These policies are also available for staff to access at any time.

As well as these policies, all employees of NDY are required to comply with any legal obligations that apply to them in the country they work in, including compliance with all relevant laws during any recruitment or initial orientation process. Our staff also complete training on our policies including training on discrimination and equal opportunity obligations during the recruitment process.

## AUDIT

In alignment with the Act requirements, NDY has screened its supply chain to identify key risk areas for potential modern slavery malpractice, which includes looking at sectors and countries NDY is supplying from. Although our direct supply chain is mainly in Australia, some products and services we buy have tier 2 and tier 3 suppliers overseas, where risks can be higher. By analysing our annual spend in each sector and using a social database, it helps us to identify high risks in our supply chain and shows us where to focus our effort to ensure we do everything we can to keep our supply chain aligned with our values.

Using our knowledge of NDY's exposure to modern slavery and key hotspots, we are currently updating company policies and procedures as they relate to our social supply chain, including our sustainable procurement strategy and suppliers code of conduct. The overall intent is to help support the elimination of modern slavery and educate our supply chain network.