



# GHD Group

## Modern Slavery Statement 2024 – 2025

### Purpose

This statement is made pursuant to the Modern Slavery Reporting requirements of United Kingdom Modern Slavery Act 2015 (UK), Australian Modern Slavery Act 2018 (Cth), and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act.

The reporting entity is GHD Group Limited as the parent company of the GHD Group of Companies. The Reporting Period is 1 July 2024 to 30 June 2025.

GHD Group Limited reports on behalf of the subsidiary companies owned or controlled by GHD Group Limited which contribute to the annual consolidated revenue for the reporting period for the United Kingdom, Australian, and Canadian operations. The list of entities (GHD Reporting Entities) is in Table A.

This joint statement is made and submitted on behalf of the GHD Reporting Entities. References in this statement to GHD refer to the GHD Reporting Entities.

This statement reports on the risks of modern slavery in GHD's operations and supply chains and the actions GHD has taken in the last reporting period to address those risks.

GHD has reported its modern slavery performance: in the United Kingdom since 2016; in Australia since 2020; and in Canada since 2023.

GHD is a signatory to the United Nations Global Compact and supports the United Nations Sustainable Development Goals. This includes the commitment to work towards eradicating the many forms of modern slavery that exist and improving human rights across our value chain.

We report on our overall sustainability performance on [GHD's website](#) and within our [UN Global Compact Communication on Progress](#).

### GHD's operations, organisational structure and supply chains

GHD is a professional services company operating in the global markets of water, energy and resources, environment, property and buildings and transportation. GHD provides engineering,

architecture, environmental, construction, advisory and digital services to a diverse range of private and public sector clients.

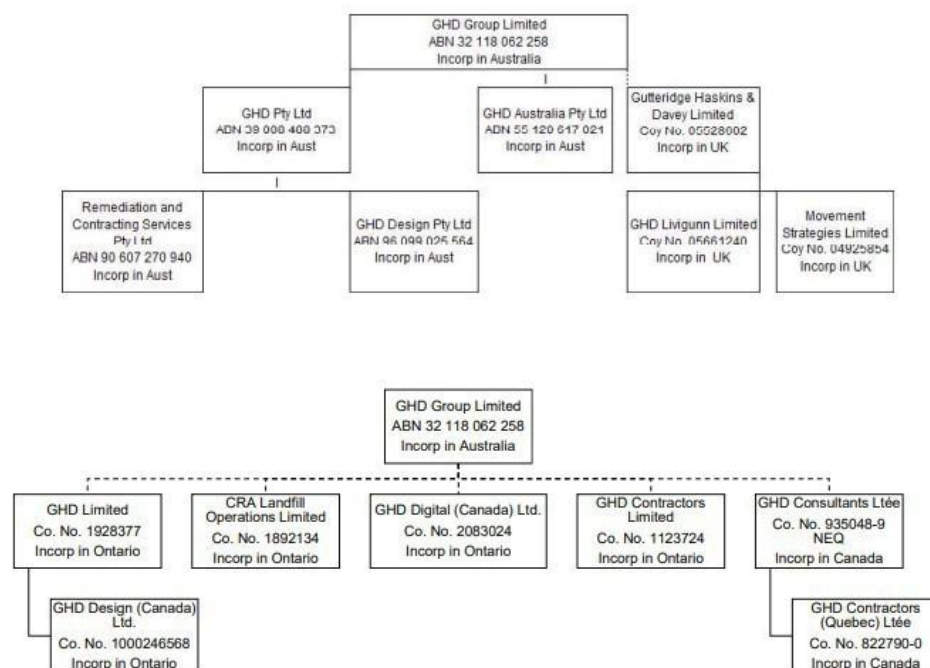
Established in 1928 and privately owned by our employees, the GHD Group of Companies operates across five continents and has permanent operations in thirteen countries: Australia, Canada, Chile, Fiji, Indonesia, New Zealand, Papua New Guinea, Philippines, Qatar, Singapore, United Arab Emirates, United Kingdom and United States of America.

In Australia, GHD employs approximately 4605 people and services are delivered by GHD Pty Ltd, GHD Australia Pty Ltd, GHD Design Pty Ltd and Remediation and Contracting Services Pty Ltd. Our people are employed by GHD Pty Ltd and GHD Design Pty Ltd.

In the United Kingdom GHD employs approximately 375 people (with 320 full time employees) and services are delivered primarily by Gutteridge Haskins & Davey Limited and our people are employed by that entity, with circa. 70 persons having their employment contracts with legacy businesses Movement Strategies Limited and GHD Livgunn Limited.

In Canada, GHD employs approximately 1885 people and services are delivered by GHD Limited, GHD Design (Canada) Ltd., GHD Consultants Ltée, GHD Contractors (Quebec) Ltée, CRA Landfill Operations Ltd., GHD Digital (Canada) Limited, and GHD Contractors Limited. Our people are employed by GHD Limited, GHD Consultants Ltée, GHD Contractors (Quebec) Ltée, CRA Landfill Operations Ltd., GHD Digital (Canada) Limited, and GHD Contractors Limited.

**Table A - Operating Entity Structure**



## Overview of the risks of modern slavery and human trafficking in GHD's operations and supply chains

GHD has considered the risk that it is directly causing, contributing to, or enabling modern slavery practices in its operations and supply chains by reference to the countries in which the companies predominantly work and the nature of its services and is of the view that its risk is low.

This is based on:

- The nature of GHD's services: GHD is a professional services company. While GHD supports projects in elevated risk sectors such as mining, construction and agriculture, our role is generally limited to professional services and the nature of our activities in these sectors is not considered high risk. GHD's professional services suppliers (subconsultants) are similarly low risk.

- The location of GHD's workforce: in addition to Australia, the United Kingdom, and Canada, GHD draws on its international workforce who are largely situated in GHD offices. This includes workforces of (i) approximately 1060 people in the Philippines who are employed by GHD and where GHD has had an operational presence since 1998, (ii) 5 people in Papua New Guinea, (iii) 215 people in the United Arab Emirates, (iv) 85 people in Qatar) and (v) approximately 420 people in Chile who are employed by GHD and where GHD has had an operational presence since 2001. In the Philippines, Indonesia and Chile, as with all GHD offices, we require the strictest compliance with labour and human rights laws.
- The location of GHD's projects: for projects undertaken by the Reporting Entities an approval process includes consideration of human rights risks.
- GHD's assets are generally limited to office equipment and consumables. Other assets such as lease interests and intellectual property have no risk. GHD generally does not engage cleaning services. Residual risks are the suppliers of office consumables such as catering, stationery, IT equipment and Personal Protective Equipment supplies and the provision of cleaning services by the owners of the properties that GHD leases.

In summary GHD considers its material risks are with subconsultants and suppliers of office consumables.

GHD's management of modern slavery risks falls within its overall approach for managing all human rights-related risks. The risk of modern slavery in GHD's organisation and supply chain is assessed within the enterprise-wide risk management framework. The Board's Audit, Sustainability, and Risk Management Committees are responsible for providing oversight on behalf of the Board.

## Due diligence, risk assessment and management in relation to modern slavery and human trafficking

GHD has undertaken appropriate risk assessment during the Reporting Period.

GHD undertakes appropriate risk-based due diligence before approving a project. Part of the due diligence includes consideration of any integrity and human rights risks posed by a project.

GHD undertakes appropriate risk-based due diligence of prospective clients and joint venture partners. The purpose of this review is to ensure that GHD is only associated with other companies and personnel that we expect to behave in a manner consistent with GHD's Integrity Policy and associated requirements.

GHD's standard practices entail prequalification of vendors prior to engagement on projects to support delivery of quality services in a safe, ethical and environmentally responsible manner. To achieve prequalification prospective subconsultant and subcontractor vendors must agree to comply with GHD's Vendor Code of Conduct (described below) which includes commitments in respect of modern slavery and human rights.

The prequalification process confirms vendors:

- have adequate Health, Safety, Environmental and Quality systems to deliver the required services
- can provide services ethically and with integrity
- have adequate and current insurances; and
- commit to adhering to GHD's **Vendor Code of Conduct**.

GHD's Vendor Code of Conduct prohibits any form of child, forced, bonded or prison labour and participation in any stage of human trafficking. Specifically, GHD's Vendor Code of Conduct covers the following topics:

- compliance with applicable laws
- ethical behaviour
- trade and export controls
- money laundering prevention

- quality
- modern slavery and human rights
- health, safety and wellbeing of employees
- sustainability and environmental responsibility
- privacy and personal data; and
- monitoring and evaluation

Elevated risk assessments are required where GHD is working:

- in a country outside its traditional operating environment
- in a joint venture; or
- with a client incorporated in a country outside its traditional operating environment.

## **Policies on modern slavery and human trafficking**

The following foundational global policies document GHD's approach to establishing the essential standards of personal and corporate conduct and the behaviour expected of everyone who works for or with GHD (including Directors, employees and vendors). Supporting these documents are specific guidelines and processes that promote achievement of the highest standards across our business.

### **Code of Conduct**

GHD's Code of Conduct establishes our behavioural expectations and conduct requirements. GHD commits to comply with the laws of the countries in which we operate that are applicable to our work and our people and that promote ethical business practices and personal behaviour consistent with our core values of Safety, Teamwork, Respect and Integrity.

### **Sustainability and Social Responsibility Policy**

The GHD Sustainability and Social Responsibility Policy provides strategic direction for how GHD encourages and supports our people, clients and other business partners in efforts to achieve sustainable outcomes. In an organisational context this means integrating social, economic and environmental issues into core business processes to achieve environmentally and socially responsible operations.

### **Health, Safety and Environment (HSE) Policy**

The HSE Policy seeks to create a culture in which health, safety and environment principles are at the front of mind and play a part of everyday business in order to eliminate or reduce to So Far As Reasonably Practicable (SFARP) the risk of injury and ill health, minimise our impact on the environment to achieve leading industry practice and prevent pollution.

### **Child Protection Policy (AU)**

GHD's Child Protection Policy aims to protect children associated with GHD-managed international development assistance projects. The policy applies to employees, subcontractors, international sole proprietors and volunteers who are working on GHD projects funded by international development assistance agencies.

### **Preventing Sexual Exploitation, Abuse and Harassment Procedures (AU)**

This framework is built on the relevant United Nations conventions, Australian law and the Australian Department of Foreign Affairs and Trade's corresponding policy. It includes a Code of Conduct with principles for expected behaviours and boundaries and contains procedures which set out what to report and how. The policy applies to employees, subcontractors, international sole proprietors and

volunteers who are working on GHD projects funded by international development assistance agencies.

## Integrity Policy

The GHD policy sets the overarching requirements for integrity, including anti-bribery and corruption, confidentiality and conflicts of interest. It reflects our 'zero tolerance' approach towards unethical business practices in respect of the internal conduct of business, and in engagement with external stakeholders and the public. It applies to all GHD employees, subconsultants and contractors.

## Human Rights Statement

The Human Rights Statement articulates our commitment to respect the fundamental rights and dignity of all people in our operations, as well as to encourage and support our clients and other business partners in their efforts to act in accordance with internationally recognised human rights standards.

## Whistleblower Policy

This policy encourages reporting concerns of improper business conduct and provides that individuals who report such conduct can do so safely, securely and with confidence that they will be protected and supported.

For more information regarding GHD's policies, please visit [the GHD website](#).

## Actions taken during the Reporting Period

The following are the steps taken by GHD in the Reporting Period to prevent and reduce the risk of modern slavery in GHD's operations and supply chains.

As part of the vendor prequalification process for new project-related vendors, GHD has implemented a new anti-modern slavery requirement. Any new project-related vendor that responds in the affirmative to the prequalification question, "Do you have policies or practices to prevent modern slavery in your procurement and supply chain activities?" must now provide evidence of their policies or practices. A GHD team member subsequently verifies the information provided.

GHD developed SustainDESIGN, a digital tool that supports project teams in embedding sustainability into project delivery by guiding sustainability integration in asset planning and design, and piloted it on select projects. The tool guides the project team through considering the environmental and social impacts and opportunities related to the project delivery. Relevant to managing modern slavery risks, the tool prompts the project team to consider whether the asset will impact or disadvantage any vulnerable communities now or in the future.

## Assessment of modern slavery risk management measures

As mentioned, GHD is of the view that the risk that it is directly causing, contributing to, or enabling modern slavery practices in its operations and supply chains is low. GHD has adopted appropriate risk management measures to mitigate against this risk. GHD has implemented training programs for its employees and has made these available to vendors to raise awareness of modern slavery. Additionally, GHD's vendor prequalification process requires that vendors adhere to GHD's Vendor Code of Conduct and GHD's foundational global policies, which prohibit any form of modern slavery. GHD's whistleblower program enables anyone to report concerns of modern slavery anonymously and without reprisal. GHD is committed to investigating any reports in a timely and rigorous manner in accordance with the relevant Policy.

There were no modern slavery issues that related either to GHD or its supply chain reported to GHD's Integrity Office during the Reporting Period. GHD acknowledges that it is difficult to assess the effectiveness of measures taken because GHD does not know of incidents that are not reported. Notwithstanding this absence of reports, GHD believes its modern slavery reporting measures to be of some degree of efficacy, as GHD has analogous reporting and management protocols for other compliance matters which have yielded incident reports by users. GHD can thus infer that its reporting protocols are accessible and effective, and the absence of modern slavery issues reported leads us to believe that no such issues occurred.

## Consultation between entities

During the reporting period, all of the Reporting Entities are required to comply with GHD's global policies. The Group's Enterprise Sustainability Leader; Enterprise Health, Safety, Environment and Quality Leader; Integrity Compliance Officer and Chief Legal Officer work across the Reporting Entities to monitor compliance with the policies outlined above and implementation of the described actions in this statement, and to consider emerging modern slavery issues.

## Training on modern slavery and human trafficking

A training module to raise awareness of modern slavery is included as a mandatory item within GHD's organisational Learning. The module, a seven-minute animated video called "**Modern Day Slavery**," defines modern slavery, highlights where it may exist within the value chain, articulates GHD's commitment to preventing it, and explains the actions GHD is taking to do so. For the reporting period, 89% of GHD employees assigned to take the training have completed the module.

To build capacity of our current and potential vendors to address modern slavery, we have made the training module "Modern Day Slavery" available to all vendors via the GHD **Vendor Web portal**.

To reinforce GHD's broader commitment to human rights, a training module on the GHD Sustainability Way is included in mandatory training for all GHD employees every two years, for new employee onboarding and for graduate programs. The Sustainability Way articulates seven principles that provide guidance to advance sustainability and respect for human rights in GHD's operations, supply chain and client project work. The module is available in English, Spanish and French. For the reporting period, 91.5% of GHD employees assigned to take the training completed the module.

## Remediation measures

GHD has not taken any remediation measures during the Reporting Period, as GHD has not identified any forced labour or child labour in its activities and supply chains.

## Remediation of loss of income

GHD has not taken any remediation measures regarding loss of income during the Reporting Period, as GHD has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains.

## Grievance mechanisms and Ethics Hotline

GHD requires suspected or actual breaches of its Integrity Policy and associated requirements to be reported. Reports can be raised and managed through GHD's **Integrity Management System**. All genuine allegations will be investigated in accordance with GHD's Integrity Investigation and Reporting Guideline.

This statement was approved by the Board of GHD Group Limited on 05 December 2025.

### Attestation (Canada):

In accordance with the requirements of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act), and in particular section 11 thereof, I attest that I have reviewed the information contained in the statement for the GHD Reporting Entities. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the statement is true, accurate and complete in all material respects for the purposes of the Act, for the Reporting Period.

**Ian Fraser**  
**Chair**

05 December 2025

\*I have the authority to bind GHD Group Limited

**Jim Giannopoulos**  
**Chief Executive Officer**

05 December 2025

\*I have the authority to bind GHD Group Limited