



# GHD Group

## Modern Slavery Statement 2023 – 2024

### 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 2023 to 30 June 2024.

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.

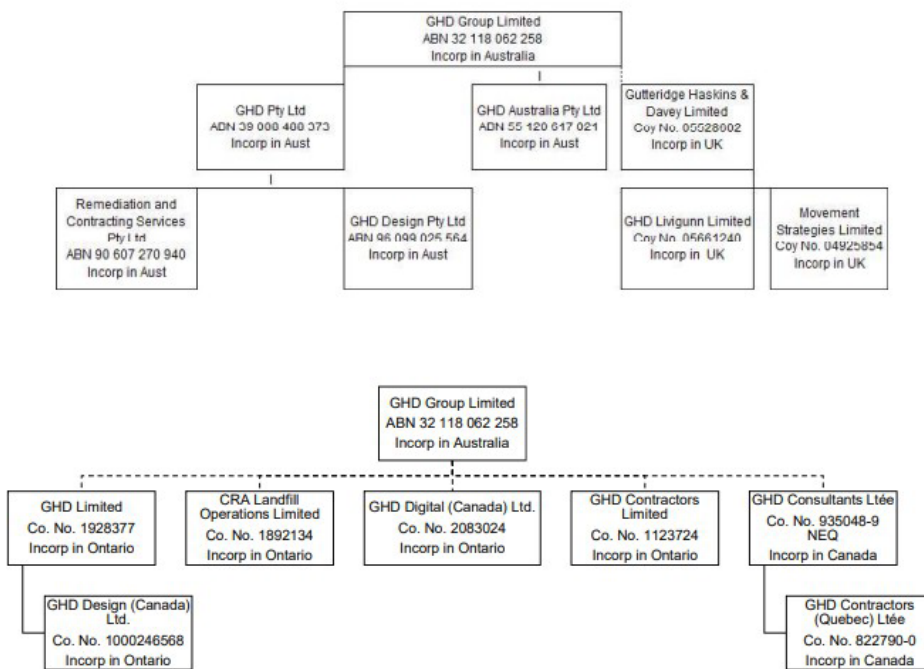
Established in 1928 and privately owned by our employees, the GHD Group of Companies operates across five continents and has permanent operations in twelve countries - Australia, Canada, Chile, Fiji, New Zealand, Papua New Guinea, Philippines, Qatar, Singapore, United Arab Emirates, United Kingdom and 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 475 people and services are delivered primarily by Gutteridge Haskins & Davey Limited and our people are employed by that entity as well as Movement Strategies Limited and GHD Livigunn 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 and is not involved directly in overseas mining, construction, agriculture or other high-risk sectors. GHD’s in-country 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 situate 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, and (ii) approximately 420 people in Chile who are employed by GHD and where GHD has had an operational presence since 2001. In the Philippines and Chile, as with all GHD offices, we ensure 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 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 the integrity and human rights risks posed by a project.

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

GHD undertakes appropriate risk-based due diligence assessment of any prospective business partner before they can be registered as acceptable to be engaged.

GHD’s standard practices entail pre-qualification of vendors prior to engagement on projects to ensure they can deliver quality services in a safe, ethical and environmentally responsible manner. To achieve pre-qualification 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 ensure the highest standards are achieved 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 an outlook and 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 expresses our commitment to ethical business conduct. It also commits to the implementation of an Integrity Policy as well as associated requirements with the objective of compliance with the law with a 'zero tolerance approach' to unethical and illegal behaviours.

## 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 disclosure of improper business conduct and ensures that individuals who disclose improper business 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.

GHD completed the implementation of a Sustainable Procurement Program in North America. The program is guided by the North America Sustainable Procurement Standard, which articulates GHD's commitment to create positive environmental, social and economic impacts while maintaining open, fair and transparent procurement practices. The Standard specifies how GHD will operationalise that commitment by incorporating social and environmental considerations within the procurement lifecycle through specific actions, including the following:

- Consider environmental, social, circular economy and total life cycle impacts during procurement decision-making,
- Offer information to enable vendors to integrate sustainable sourcing into the procurement process,
- Review and monitor vendor performance and compliance to address misalignment with GHD's social and environmental commitments.

As part of the Sustainable Procurement Program implementation, the North America Procurement team conducted awareness sessions with those responsible for procurement across the business. The sessions addressed both procurement for GHD's operations and procurement for client projects and included a discussion on the risk of modern slavery. Additionally, the North America Procurement team set a 2030 target of at least 67 percent of our vendors being committed to ESG Programs of their own, such as programs to reduce greenhouse gas emissions, prohibit modern-day slavery, promote the hire of diverse, small, local and Indigenous-owned businesses in line with GHD's own commitments. The team engaged with 30 of GHD's top spend vendors in North America to discuss their sustainability commitments and progress in these areas.

The Sustainable Procurement Program in North America will provide valuable insights as we look to implement similar efforts in Australia and the United Kingdom.

As a result of GHD's project and client due diligence processes, GHD decided not to pursue certain projects that were presented during the reporting period. The due diligence processes identified risks related to forced labour in the supply chain for the projects.

## 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.

No modern slavery issues were reported or identified within GHD or its supply chain during the Reporting Period. GHD acknowledges that it is difficult to assess the effectiveness of measures taken because GHD does not know of incidents which 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 companies that constitute 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; Ethics 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 HSE Learning. The module, a seven-minute animated video called "**Modern 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, 83% 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, 85% 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

Modern Slavery is prohibited by GHD's Integrity Policy and associated requirements. 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** and reported through our **Integrity Hotline** or our internal Integrity Reporting Database. All genuine allegations will be investigated in accordance with GHD's Integrity Management Investigating Procedure.

This statement was approved by the Board of GHD Group Limited on 13 December 2024.

### 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.

**Rob Gordon Knott**  
**Chair**

13 December 2024

\*I have the authority to bind GHD Group Limited

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

13 December 2024

\*I have the authority to bind GHD Group Limited