



# GHD Group

## Modern Slavery Statement

### 2022 – 2023

#### 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 2022 to 30 June 2023.

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<sup>1</sup> 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 and in Australia since 2020. This statement is GHD's first instance of reporting its modern slavery performance in Canada.

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

<sup>1</sup> Modern slavery includes, without limitation, forced labour and child labour as those terms are defined in Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act.

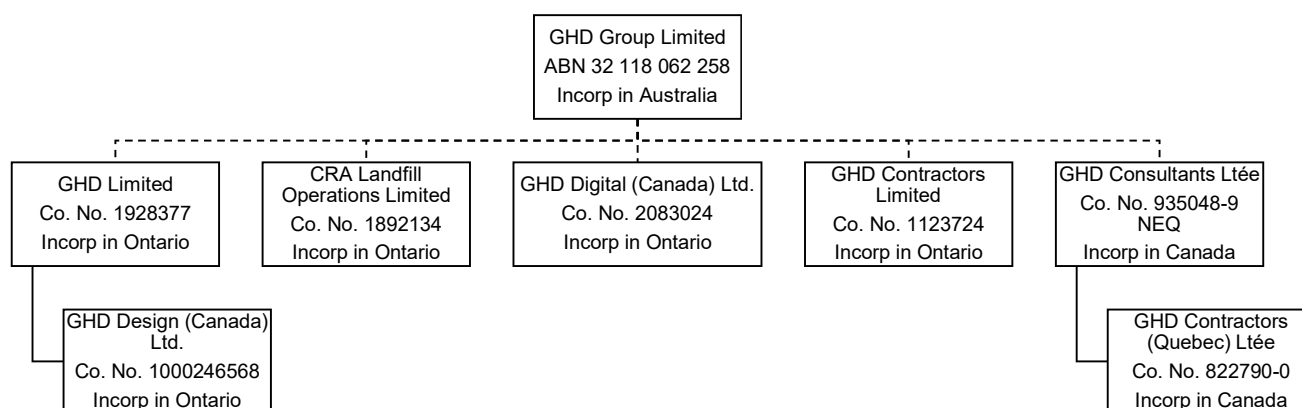
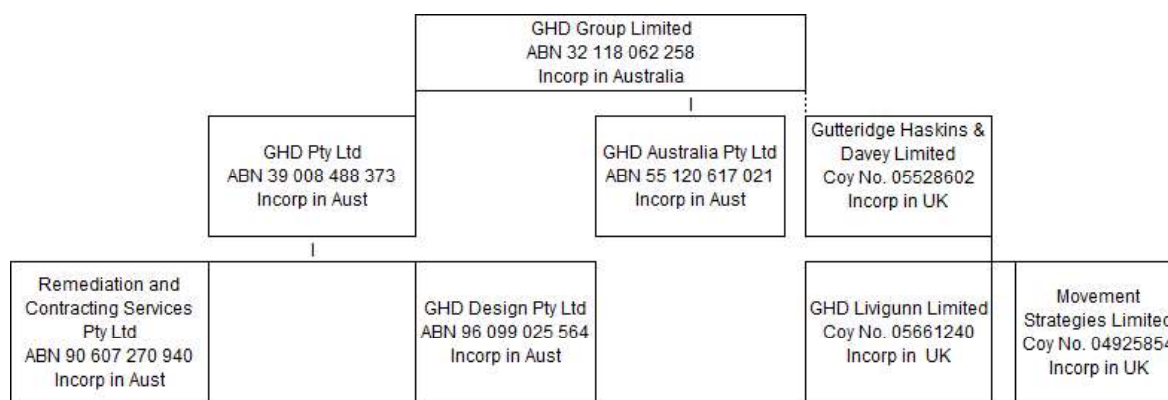
operates across five continents and has permanent operations in twelve countries - Australia, Canada, Chile, Fiji, New Zealand, Papua New Guinea, Philippines, Qatar, Singapore, United Arab Emirates, United Kingdom and United States of America.

In Australia, GHD employs approximately 4000 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 500 people and services are delivered by Gutteridge Haskins & Davey Limited, Movement Strategies Limited and GHD Livigunn Limited and our people are employed by those entities.

In Canada, GHD employs approximately 2000 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 (Quebec) Ltée. Our people are employed by GHD Limited, GHD Consultants Ltée, and GHD Digital (Canada) Limited.

**Table A - Operating Entity Structure**



Each of the GHD Reporting Entities has their predominant business operations in Australia, United Kingdom, or Canada, respectively. GHD Pty Ltd also operates a branch in the Philippines with approximately 1000 employees. GHD Group Limited also operates a subsidiary in Chile, GHD Promina S.A. with approximately 350 employees. GHD's supply chains are predominantly in

Australia, the United Kingdom, Canada, the United States and, to a lesser extent, the Philippines and Chile. These supply chains consist of subconsultants and subcontractors for the delivery of professional services and to a much lesser extent suppliers of office consumables such as catering, stationery, IT equipment and PPE supplies.

Given its international nature, GHD undertakes project work in other countries from time to time as part of its broader business strategy. Those opportunities are limited to its core business operations of consulting and supply chains in those countries are similarly limited to professional services.

## **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 situated in GHD offices. This includes workforces of (i) approximately 1000 people in the Philippines who are employed by GHD and where GHD has had an operational presence since 1998, and (ii) approximately 350 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 PPE supplies and the provision of cleaning services by the owners of property 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 Management System.

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 prequalification of vendors prior to engagement on projects to ensure they can deliver 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.pdf \(sharepoint.com\)](#)

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 Policy**

The GHD Sustainability Policy provides strategic direction for how GHD encourages and supports our clients and other business partners in their 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 Management Policy**

The GHD policy expresses our commitment to ethical business conduct. It also commits to the implementation of an integrity management system 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 Sustainability program, 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 updated the Vendor Prequalification form with the following vendor question relating to the prevention of Modern Slavery:

*Does your organization have current policies, strategies, or practices to prevent modern slavery in your operations and supply chain?*

GHD incorporated a human rights risk review into its Project Setup Form (PSF). The PSF is an enterprise-level mandatory procedure. Responses to the PSF questions provide the information necessary for GHD management to approve a proposal or project. The most recent update to the PSF introduced a question on compliance with GHD's Project Selection Guidelines. The Guidelines include the following language referencing the United Nations Universal Declaration of Human Rights, which specifically prohibits slavery and servitude:

*GHD will implement the necessary measures to ensure respect for human rights\* in our project work and will not knowingly participate in projects that violate human rights of impacted stakeholders.*

*\*as outlined in the United Nations Universal Declaration of Human Rights*

GHD conducted a risk assessment workshop to assess the level of risk associated with each procurement category of its procured services, consumables and equipment in North America. The assessment reviewed a diverse list of risk factors and their potential impact to environmental and social risks, including modern slavery, related to the provision of the service, consumption of the commodity or use of equipment. The workshop results support the prioritisation of higher risk vendors we plan to engage with on their environmental and social performance through the vendor management process. GHD intends to conduct a similar risk assessment for procurement in our other regions, including Australia and the United Kingdom.

GHD in North America created a sustainable procurement specialist role to support the North American procurement function. The specialist role supports the development of vendor governance for sustainable procurement and engages with vendors to improve their sustainability performance, including preventing modern slavery. The specialist will engage with identified high risk vendors in North America with the aim of improving their sustainability performance. GHD intends to implement similar roles across our other regions, including Australia and the United Kingdom.

GHD developed and launched a mandatory training module on its "Sustainability Way". 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 and is now included in mandatory training for all GHD employees every two years, new employee onboarding and graduate programs.

## **Assessment of modern slavery risk management measures**

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, GHD considers some degree of effectiveness of incidents of modern slavery being reported and managed based on limited measurable indicators. Measurable indicators include:

- 3 reported incidents under GHD’s Child Protection Policy
- 3 reported incidents under GHD’s Preventing Sexual Exploitation, Abuse and Harassment Procedures
- Nil reported incidents of Modern Slavery to the Integrity Compliance Officer

GHD has rigorous investigating guidelines. All reported incidents are investigated, managed and ultimately closed out in accordance with the relevant Policy.

## 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. A significant percentage 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, new employee onboarding and 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.

## 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 Management Systems. GHD requires suspected or actual breaches of its Integrity Management Systems 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 11 April 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**

23 May 2024

\*I have the authority to bind GHD Group Limited



**Jim Giannopoulos**

**Chief Executive Officer**

23 May 2024

\*I have the authority to bind GHD Group Limited