TETRA TECH
International Development
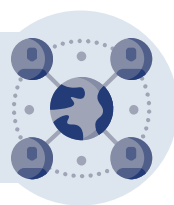
Tetra Tech International Development

Modern Slavery Statement

2020

Table of Contents

1. Introduction

Tetra Tech International Development is committed to continually improving its practices to combat slavery and human trafficking and proactively raise the awareness of modern slavery throughout its business and within its supply chain.

We believe that by engaging in honest, supportive and collaborative dialogue within and across industry sectors about these problems, we can fully understand the challenges we all face and design and implement sustainable solutions.

Our brand and development

In July 2019, Coffey International Development Limited's (Coffey) parent company, Tetra Tech UK Holdings Limited acquired WYG plc. (https://www.wyg.com/news-and-press-releases/tetra-tech-acquires-wyg). Further to this, WYG plc's international development business (IDB) has been operationally merged into Coffey's European international development division.

Coffey and IDB operations have come together and now trade under the name **Tetra Tech International Development**. Please see here for more details.

For the purposes of our reporting obligations under the Modern Slavery Act 2015, this statement is therefore given for and on behalf of:

- Tetra Tech International Development Limited – formerly Coffey International Development Limited (see: https://beta.companieshouse.gov.uk/company/03799145); and
- Tetra Tech International Development BV (UK Branch) – formerly WYG International Development BV (UK Branch) (see: https://beta.companieshouse.gov.uk/company/FC034786).

(together, Tetra Tech)

These entities are based at the same offices in Reading, UK, and their managing director (Ben Ward, the signatory of this statement) is a statutory director of both companies.

Our aim is to work with our colleagues, suppliers and competitors to reduce the exploitation and abuse that characterises modern slavery and to raise awareness throughout the supply chain of just how serious an issue this is.

This is our fourth statement and covers the twelve months to 31st March 2021.

Ben Ward

Managing Director

on behalf of *Tetra Tech International Development Limited* and *Tetra Tech International Development BV (UK Branch)*

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Sign off MD Ben Ward		Sign off COO Keith Onslow	

2. About us

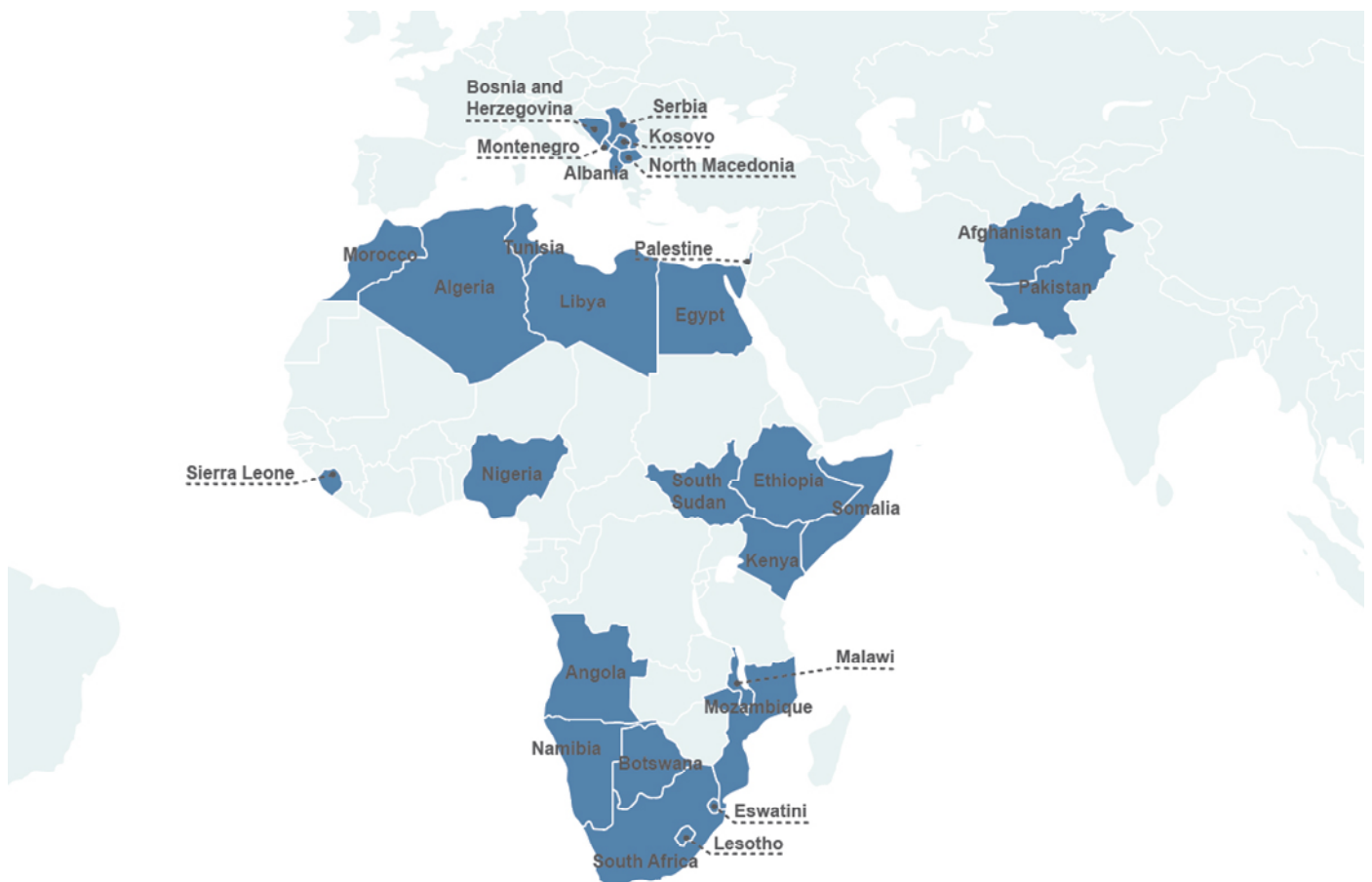Tetra Tech pursues clear solutions to international development's most complex problems. Working with global partners, we design and deliver programmes that make real differences to lives and economies.

Tetra Tech is part of the Tetra Tech Inc. group, which for over 30 years has provided solutions in the water, environment, infrastructure, resource management and energy sectors, as well as for international development.

We help countries around the world to make measurable progress towards the Sustainable Development Goals. Using our extensive networks, global partnerships and technical excellence, we work with countries, multilateral organisations and civil society to advance towards those goals by reducing poverty, developing peace and prosperity and improving quality of life for all.

Tetra Tech implements international development projects all over the world. Our four key practice areas are: Economic Growth; Governance, Security and Justice; Evaluation and Research; and Infrastructure. We have incorporated IDB's portfolio under these practices.

We are trusted partners to our clients, including the UK's Department for International Development, Department for Business, Energy and Industrial Strategy, UK's Foreign and Commonwealth Office, the European Commission and the European Investment Bank, as well as the World Bank and Asian Development Bank.

3. Our commitment

Tetra Tech is committed to maintaining business practice standards that honour and protect the dignity and integrity of everyone with whom the company conducts business, employs and serves. This includes an opposition to slavery and human trafficking in any form.

We are committed to preventing slavery and human trafficking in all our activities and ensuring that we and our supply chains are free from slavery and human trafficking and endorse human rights such as:

- the freedom of employees terminating their employment;
- freedom of movement;
- the prohibition of threats of violence, harassment and intimidation;
- the prohibition of debt bondage and bonded labour;
- the prohibition of prohibit disciplinary measures, including the obligation to work;
- the prohibition of compulsory overtime; and
- the prohibition of worker-paid recruitment.

Our commitment to understanding the risks to our business from modern slavery comes from the very top of the business.

Our Managing Director, the board and our shareholders, Tetra Tech Inc., view this issue as critical to our success. We see it as an opportunity to examine our practices and procedures, honestly observe the mistakes we make and commit to a program of continual improvement.

Everyone who works for or with Tetra Tech must be left in no doubt that we will not tolerate any form of labour abuses within our organisation and that we will work to highlight and eradicate such abuses wherever we find them.

Our policies and practices

Our Modern Slavery Statement covers two areas of focus in which we work to ensure that:

- the supply chains in our consultancy/sub-contracting services are corruption and slavery free, which often take place in challenging locations; and
- the goods and services we procure to help improve productivity, efficiency and routes to market for beneficiaries of our clients' aid projects, are as far as practicable, corruption and slavery free.

4. Partnership and collaboration

Tetra Tech has sought specialist advice and guidance from reputable national and international organisations to make sure that our policies and procedures are industry-leading.

UN Global Compact

Our parent company, Tetra Tech Inc., is a registered participant member of the UN Global Compact. As part of this membership, Tetra Tech has joined the UN Global Compact Local Network UK.

The UN Global Compact is the world's largest corporate sustainability initiative where companies align their strategies and operations with universal principles on human rights, labour, environment and anti-corruption, and take actions that advance societal goals.

UN Global Compact Local Networks were launched to help make the UN Global Compact relevant across the world's different economic, political and cultural landscapes and to support meaningful engagement with participants. The UN Global Compact Local Network UK implements a programme of activity in support of UK-entities who wish to maximise the benefits of their engagement with the UN Global Compact.

Tetra Tech is delighted to be part of the join the UN Global Compact Local Network UK in order to collaborate with other companies, share industry knowledge and help build better solutions and innovations to tackle and uphold universal principles, including modern slavery and labourright abuses.

Skillcast

We work with SkillCast to provide internal online training to all our staff on various ethical training modules, including a modern slavery module which raises the awareness of modern slavery and covers:

- how to identify modern slavery within our company and our supply chain;
- how to effectively deal with a scenario when modern slavery is discovered; and
- the obligation to report to senior management.
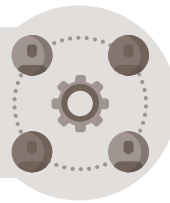
Clarkslegal

We have previously worked with the specialist Supply Chain team at Clarkslegal LLP to better understand and manage our modern slavery risks and to develop our first modern slavery statement for 2017/2018.

Transparency International UK

We have worked with Transparency International to design an anti-bribery training course that is now part of Tetra Tech's internal training and development program. It is monitored and updated to ensure that all employees are aware of their responsibilities. Anti-bribery policies and procedures are also central to the fight against modern slavery as many of the practices overlap and intersect.

5. Areas of concern

Irregular workers

The use of day-laborers or other unofficial workers is a common practice in many developing countries.

While irregular workers can be a source of efficient and flexible labour, they can also be vulnerable to abuse and exploitation.

We seek to source our workers through recognised and credible systems, where we are able to keep records of their terms of engagement, and work with our partners and suppliers to help them maintain similar standards.

Cash payments

The use of cash is unavoidable, particularly in many developing countries where sophisticated banking facilities may not be trusted or accessible. The risks associated with cash payments are significant, however, as they can easily be intercepted or used inappropriately, particularly in the facilitation of modern slavery practices.

Where possible we use electronic payment systems, mobile phone payments and other forms of micro-banking, which help to ensure that payments are made and received in full, on time and in a way that can be audited and monitored.

Where the use of cash cannot be avoided, we ensure that our staff and partners are aware of the risks associated with cash payments and are vigilant about recording and monitoring transactions.

Child labour

In some of the countries where we operate there is a risk of child labour and other forms of exploitation.

When Tetra Tech starts working with new partners and suppliers, we make it very clear that nobody under the minimum legal age should be employed on our projects.

Where we have identified a high risk of child labour, whether because of the nature of the project or because of the location, we will institute an elevated due diligence protocol.

Safeguarding has been an issue and can be linked to modern slavery and therefore, we have introduced the Safeguarding Policy which clearly sets out our stance and lays out the procedure for reporting.

6. Mitigation efforts

Due Diligence and Contracting

Supplier due diligence and local intelligence

We undertake thorough due diligence on each supplier and partner prior to contracting.

We conduct comprehensive corporate and personal background checks. We also confirm with the suppliers and partners if they plan to sub-contract any part of the services, HR processes and policies in place, if they employ migrant workers, if they hold physical copy of their staff's passport and if their staff frequently work in excess of 12-hour shifts per day.

We use a comprehensive enhanced due diligence tool, World Check, provided by Thompson Reuters. Where necessary, we conduct police record checks and other desk-based assessments.

We have strict terms and conditions in our contracts with all of our suppliers that they will adhere to the Modern Slavery Act and our policies (including Whistleblowing Policy) and ensure that they have measures in place reiterating their commitment - and that of their employees, consultants or subcontractors to understanding modern slavery and child exploitation.

Our teams are trained on the importance of thorough due diligence checks and complete induction and annual ethical training, The comprehensive training provision covers subjects such as: ethical behaviour, safeguarding including child & vulnerable adult protection, and modern slavery.

Risk mapping

Tetra Tech has a dedicated risk and compliance team and regularly monitors and maps risk profiles for all projects.

We have incorporated questions on modern slavery risks into our risk assessments, to highlight any modern slavery violations at the outset of the project and capture them on our strategic risk register, which is monitored throughout the lifeline of the project.

We operate a dynamic risk reduction strategy that recognises that some projects and some locations will present a higher risk than others.

Where we identify a high risk of exploitation and abuse, we implement appropriate risk reduction measures. However, we are equally careful not to become complacent about relatively 'safe' jurisdictions, as these too can present risk challenges that need to be considered and addressed.

Monitoring, evaluation and remedy

Tetra Tech is acutely aware that harm reduction measures must include effective monitoring and remedy procedures. The nature of our work means that we are often operating in challenging environments, where exploitation and abuse is common.

If a project is considered high risk, we will activate a more intensive monitoring program to ensure that the projects we are facilitating progress appropriately. This might include more active contact with our personnel on the ground and/or closer monitoring or auditing of the project.

It is vitally important that we react appropriately if we encounter such abuse. We have a robust set of internal protocols that trigger responses to allegations of improper conduct. This recognises that some violations are worse than others and that responses need to be graduated and fair to all parties.

 The ultimate sanction would be to terminate a contract or project. However, we recognise that this may have unintended consequences and that a better course could be to impose a remedial structure into the project with close scrutiny.

Employee engagement and employment

Tetra Tech is passionate about empowering its staff to take responsible and ethically sound decisions. We recognise that sometimes urgent decisions have to be taken without reference to senior management personnel. As such, we strive to ensure that all local managers are trained to understand and insist upon ethical trading practices.

We provide continuous project management and ethical training and make sure this is comprehensively disseminated. It is supported by project-specific factsheets for managers to use when considering how best to manage their projects.

Policies and training

To ensure that our staff and all those in our supply chain comply with our ethics, we have in place the following policies:

Whistleblowing policy

We want all of our staff members and suppliers to feel that they can safely expose any wrongdoing that they encounter at Tetra Tech.

The policy, which is provided to all staff members and suppliers, gives detailed support and guidance on the whistleblowing procedure. The policy is clear that any matters raised will be investigated quickly and confidentially.

Conflict of interest and anti-bribery policy

Tetra Tech has a comprehensive anti- bribery policy, which helps staff and suppliers to understand their obligations under the Bribery Act 2010.

Employee Code of Conduct

This policy requires all Tetra Tech employees to act in accordance with all relevant national and international laws and to abide by the specific codes of practice such as, bribery and equality of opportunity.

Safeguarding policy

This policy is provided to all staff members, our partners and suppliers and highlights our high stance on protecting children and vulnerable adults.

Investigations

We have received investigations training to support designated staff in responding to and manage safeguarding incidents arising through Tetra Tech's projects.

We now have knowledge of key principles and practice of case management and investigation of safeguarding incidents including modern slavery incidents.

We have increased our capacity to assess, respond and to take appropriate decisions in relation to safeguarding incidents

We rolled out Safeguarding Train The Trainer to staff members. We want to effectively combat the root causes of safeguarding risks, where possible, our training is face-to-face and interactive. It gives the opportunity to discuss the nuance of gender and power dynamics and reflect the issues that individual managers might experience on their programmes.

Ethical Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide comprehensive training to all Tetra Tech employees on modern slavery, conflict of interest and anti-bribery, as well as on our Code of Conduct.

To ensure that our staff and supply partners delivering our programmes or component parts of our programmes are able to meet the highest standards of ethical and professional behaviour we provide compliance and supply chain management training which highlight the risks within delivery chains and how to aware of the potential for slavery, servitude, forced and compulsory labour and human trafficking.

7. Continually improving

We are always seeking ways to improve our approach to the Modern Slavery Act.

We are regularly providing training on conflict of interest and anti-bribery, our code of conduct, safeguarding and how to conduct effective due diligence to all of our staff.

We also stated that we would put together a process for auditing our suppliers and conduct audits using a risk-based approach. We now train project teams on managing suppliers; how to look out for signs of slavery and child labour.

Building on this exercise, we are still in the process of developing a series of supply chain and modern slavery audits across a sample of programmes within our portfolio. Where there is scope for improvement identified we will ensure that programme teams are provided clear action points for what needs to be remedied and by when.

One of our goals is to fully integrate Coffey's and IDB's operations and ensure that a consistent approach is applied across all projects on compliance training, policies and processes.

Detailed child labour risk mapping

Where there are programmes with a risk of child labour abuses we provide tailored safeguarding training to Programme senior leadership team to ensure the right, culturally sensitive measures are in place to prevent child labour . We recognise, that it remains a potential threat on all of our Infrastructure programmes.

We monitor risk of child labour in the countries where we identify that it is a high risk. This has also been integrated into the corporate risk register which outlines mitigation plans in the event that child labour is discovered or suspected.

The use of cash

Over the last 12 months we continue to reduce the number of cash transactions wherever possible and we continue to increase the use of electronic fund transfers in all the countries in which we operate.

Dedicated modern slavery web page

Our website - www.Tetra Techeurope.com - features a dedicated page detailing our Responsible Business Practices, featuring our Modern Slavery Statement and other relevant documents.

We will publish any internal updates and promote modern slavery to other individuals and companies who are developing innovative and ethical supply chain practices. We will encourage participation from our staff, clients, partners, contractors and others.

8.   Conclusions

It is entirely unacceptable for people, wherever they live and work, to be subjected to abusive labour practices.

We recognise that, as a company responsible for the distribution of donor funding, we have an obligation to ensure that our processes are robustly ethical and sustainable.

In this statement, we have highlighted some of the policies and processes we have implemented to ensure that, as far as possible, our value chains are free from slavery. However, we will remain vigilant to ensure that we are not unwittingly party to this most insidious of crimes.

We approach this problem with resolve but also with humility. The challenges we face are serious and on-going. We will continue to engage in collaborative and mutually supportive conversations on these issues with clients, employees and other stakeholders. Only by doing so will we be able to make real progress towards ending modern slavery and thus help to develop a fairer and more sustainable world.