

Modern Slavery Statement 2022

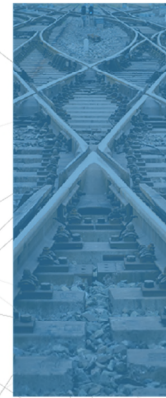


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1. Introduction

Tetra Tech International Development Europe Limited¹ (**Tetra Tech**) is committed continually to improve our practices to combat slavery and human trafficking and proactively raise the awareness of modern slavery throughout our business and within our supply chain.

This statement has been provided on behalf of Tetra Tech and its subsidiary companies.

We're part of a leading, global consulting firm, Tetra Tech, Inc., that provides practical and sustainable international development services, empowering local communities and leveraging private investment to create a safer, more prosperous world for all. Our purpose is to improve societies, economies, the environment, and people's lives.

We are proud of our ethical standards that we have embedded and maintain into the fabric of our business.

Our values shape the way we work with all of our clients and with each other – these include valuing our people, collaboration, integrity, innovation, and consistently delivering on what we say we will do.

This allows us to outline our responsibilities towards anyone working within our supply chains and that they are treated with fairness, dignity, and integrity. We recognise the need to remain alert to the risk of slavery and human trafficking occurring in any area of our operational business and are committed to continuous improvement to prevent this.

Our employees and suppliers are encouraged to raise concerns through our reporting channels about any suspicion that slavery or human trafficking may exist in any part of our business or supply chain.

To date, we have received no reports of slavery or human trafficking relating to any of our activities.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Tetra Tech's slavery and human trafficking statement for our financial year 2022.

Ben Ward

Managing Director

¹ Registered in England under company number 04120956

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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 International Development Europe Limited is a wholly owned subsidiary of Tetra Tech, Inc., a NASDAQ-listed company with a global workforce of over 20,000 staff working across 120 countries. Tetra Tech, Inc. has provided solutions for over 30 years in the water, environment, infrastructure, resource management and energy sectors, as well as for international development.

Tetra Tech helps countries around the world to make measurable progress towards the Sustainable Development Goals. We have corporate offices in the following locations: London, Nottingham, Reading, Amsterdam, Nairobi and Warsaw as well as project offices in multiple locations.

Tetra Tech implements international development projects all over the world. Our three core practice areas are: Economic Growth and Infrastructure; Governance, Security and Justice; and Evaluation and Research. The suppliers to these practices are primarily technical experts and some operational suppliers for our international project offices.

We are trusted partners to our clients, including the Foreign, Commonwealth and Development Office, the European Commission and the European Investment Bank, the World Bank, and foundations.

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3. Our commitment



Tetra Tech is committed to maintain 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 Leadership Team, and our ultimate parent company, 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 programme 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 free of slavery 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.

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4. Partnership and collaboration



UN Global Compact membership

Our parent company, Tetra Tech Inc., is a registered participant member of the UN Global Compact. As part of this membership, Tetra Tech International Development Limited 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 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 labour right abuses.

Training

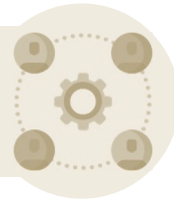
We use the multiple platforms to provide internal online training to all our staff on various ethical training modules, including a modern slavery module which raises the awareness of modern slavery and covers:

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

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 programme. 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.

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5. Areas of concern

Irregular workers

The use of day-laborers or other unofficial workers is a common practice in many of the countries in which we operate. 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 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 UK 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 and additional safeguarding procedures.

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

COVID-19 pandemic

As the global pandemic is gradually easing, vulnerable workers may feel unable to speak up about any concerns they have about their working environments – especially given the difficult economic climate, job uncertainty, and potential fear of redundancies. We have updated our whistleblowing policy and ensured that this is made widely available, including details such as confidential reporting hotlines. We also offer toll-free lines for employee support, which provides (for example) counselling to support wellbeing and resilient mental health. The pandemic disrupted numerous industries and businesses, resulting in insolvencies and shifts in production away from certain items and towards others. This could result in suppliers being unpaid for services they have rendered, tasks they have completed or equipment and machinery they have delivered. Owing to this, we prioritise engagement with suppliers including, where possible, paying for orders already in production and not contracting any new suppliers if we do not have the funds to pay them.

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6. Risk assessment and mitigation efforts



Risk assessment

Tetra Tech employs around 130 staff in the UK and the EU. Most of our employees are employed on a full-time basis with a small number of part-time employees. Our wider staff base includes project staff and consultants. We have a dedicated in-house corporate risk and compliance team regularly monitors risk profiles for all projects.

Our suppliers have supply chains of their own and our high-risk projects are required to map their suppliers visually to ensure project management teams have oversight of this. Our work requires us to operate in countries considered to have a higher risk profile for modern slavery – however, it is primarily an indirect risk associated with our delivery partners and supply chains.

We capture this risk on our risk registers, which is monitored throughout the lifetime of the project. Screening of our programme-level supply chain suggests that our highest risk areas are:

- Cleaning and catering services;
- Taxi services;
- Hotel and restaurant services.

Due Diligence and Contracting

Supplier due diligence and local intelligence

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

Staff are vetted prior to employment for their right to work in the UK and a criminal background check is done to ensure there is nothing of concern.

Remuneration of employees and consultants is based on industry benchmarks, and feedback provided on salary levels by employees and consultants.

For suppliers, due diligence, as a minimum, takes the form of completing an online form via our bespoke Engage Contracting System. This online platform manages our vetting and contracting process. We ask for all relevant supporting documentation and a range of questions to identify if the supplier can perform the work and to check that there are no historical or financial issues we should be aware of.

Included within the due diligence questions are a series of questions related to modern slavery. We ask if suppliers plan to sub-contract any part of the services; about 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, Lexis Nexis *World Compliance*, which uses a number of verified databases to check that any planned suppliers are not on any debarred list or have involved in any fraudulent activities. 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 Tetra Tech policies (including our Whistleblowing Policy) and ensure that suppliers have measures in place reiterating their commitment – and that of their employees, consultants, and/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 and vulnerable adult protection, and modern slavery.

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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 programme 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 abuse or exploitation. 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 proportionate 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 onto the project with close scrutiny.

Employee engagement and employment

Tetra Tech is passionate about empowering its staff to take responsible and ethically sound decisions. Our Employee Engagement Forum provides a platform for representatives to escalate concerns or issues they need the Leadership Team to address.

At a project level, we also 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, as well as access to a comprehensive Project Management Toolkit.

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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 (as well as publicly via Tetra Tech's website) gives detailed support and guidance on our whistleblowing procedure. The policy is clear that any matters raised will be investigated quickly and confidentially. This policy was updated in early 2022.

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, anti-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 combat effectively the root causes of safeguarding risks, and, 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. We have recently devised a new training that encompasses all these elements. The Ethics and Professional Conduct training seeks to ensure that all our employees prevent, prepare, and protect both their colleagues and our supply chain map from any form of modern slavery.

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.

New Safeguarding e-learning

In spring 2022, Tetra Tech rolled out two online training courses on Brainier (Tetra Tech, Inc.'s corporate training platform) which was mandatory for all Tetra Tech staff. These courses were: Introduction to Safeguarding; and Safeguarding for Programmes.

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7. Continually improving



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

We regularly provide 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 will continue to work with and vet our suppliers for modern slavery risks. Our improved contracting process now allows us to assess supplier responses in a more comprehensive manner and automate updates to their responses every two years.

We review our supply chain in line with our government reporting. Our most recent review of our supply chain across a sample of programmes within our portfolio allowed us to request revised declarations of compliance from our suppliers. 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.

UK Modern Slavery Bill

We are monitoring developments in relation to the UK's Modern Slavery (Amendment) Bill. We plan to update our policies and procedures as required and our next Modern Slavery Statement will reflect this.

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 appropriate, culturally sensitive measures are in place to prevent child labour. We recognise that it remains a potential threat particularly 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 have reduced the number of cash transactions and increased the use of electronic fund transfers in all the countries in which we operate. We will continue to do so wherever practicable.

Dedicated modern slavery web page

Our website features a dedicated page detailing our Responsible Business Practices, featuring our Modern Slavery Statement and other relevant documents – [Responsible Business Practices – intdevtetratecheurope.com](https://intdevtetratecheurope.com).

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.

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8. Conclusions

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

We acknowledge the scope and scale of the challenge faced by our work and our clients as we work together to create a better world, free of slavery. We recognise that, as a company responsible for the distribution of donor client 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. Tetra Tech's suppliers and employees are expected annually to commit to our Supplier Code of Conduct or Employee Code of Conduct respectively. We have a strong culture of integrity throughout our organisation and will continue to maintain this through:

- Continual review of our processes including out vetting procedures;
- Training provision for all staff so they are able to identify risks in relation to slavery;
- Strong commitment from our Leadership Team.

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