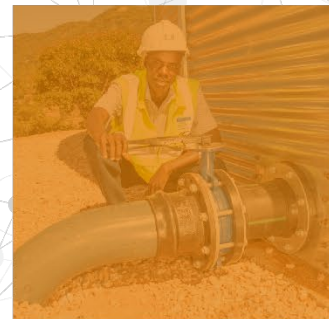
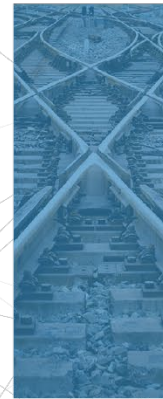




**TETRA TECH**  
International Development

# Modern Slavery Statement 2023



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# 1. Introduction

**Tetra Tech International Development Europe Limited<sup>1</sup> (Tetra Tech Europe) 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.**

This statement has been provided on behalf of Tetra Tech Europe 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.

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 collaboration, integrity, innovation, and consistently delivering on what we say we will do. Those values form the underlying principles to our Modern Slavery Statement. 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 its operational business and are committed to continuous improvement to prevent all forms of slavery and human trafficking within our remit.**

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.**

Ben Ward

**Managing Director, Tetra Tech International Development Europe Limited**

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<sup>1</sup> Registered in England under company number 04120956

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## 2. About us



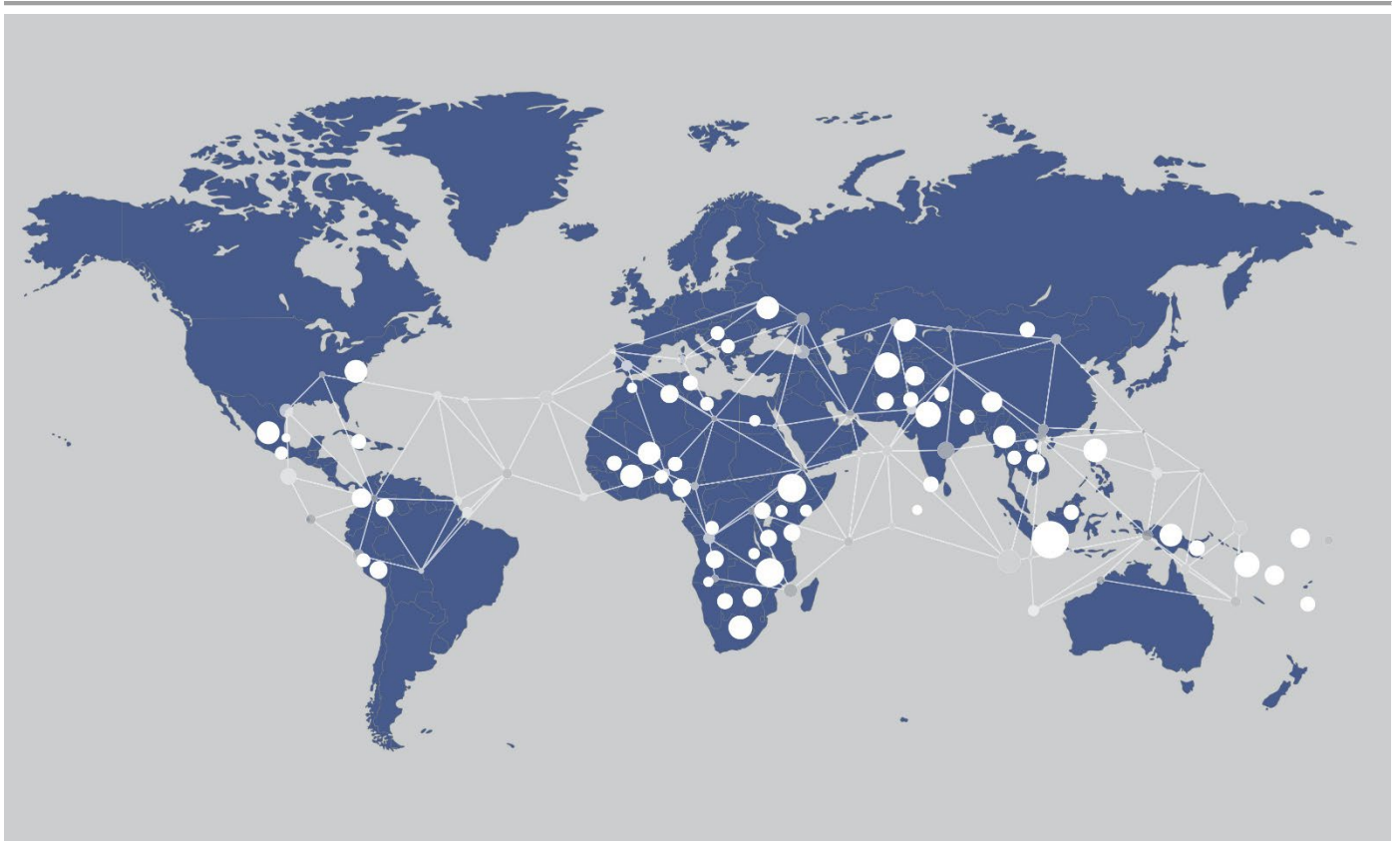
Tetra Tech Europe pursues clear solutions to international development’s most complex problems. Working with global partners, we design and deliver programmes that make real differences to lives and economies.

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

Tetra Tech Europe 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 (UK), Amsterdam (NL) and Warsaw (PL). We also have international project offices in the following locations: Abuja, Nairobi, Rabat, Pretoria (Africa), Amman, Ramallah (Middle East), Belgrade, Pristina (Western Balkans).

Tetra Tech Europe implements international development projects all over the world. Our three key 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 UK’s Foreign, Commonwealth & Development Office, Department for Business, Energy and Industrial Strategy, the European Commission and the European Investment Bank, the KfW Development Bank, as well as the World Bank and Asian Development Bank, the Green for Growth Fund, and the UN.



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### 3. Our commitment



**Tetra Tech Europe is committed to proactively 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 Europe 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.**

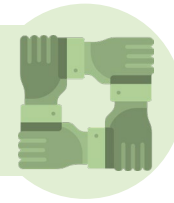
[Our policies and practices](#)

**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 modern 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 modern slavery free.

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## 4. Partnership and collaboration



Tetra Tech Europe 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 Europe's UK subsidiary 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 international development and other 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 Europe 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 labour right abuses.

### Skillcast and Brainier

We use the with SkillCast and Brainier 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 effectively deal with a scenario when modern slavery is discovered; and
- the obligation to report to senior management.

### Clarkslegal UK

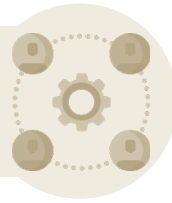
We have previously worked with the specialist Supply Chain team at Clarkslegal LLP to better understand and manage our modern slavery risks and to develop our first UK Modern Slavery statement for 2017-2018. Received advice on modern slavery from Clarkslegal is now reflected in all our company documents and relevant trainings.

### Transparency International UK

We have worked with Transparency International UK to design an anti-bribery training course that is now part of Tetra Tech Europe'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.

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## 5. Areas of concern



### Post Pandemic Effects

As we are in the post period of the 2020-2021 Covid 19 pandemic, vulnerable workers may still feel unable to speak up about any concerns they have about their working environments – especially given the difficult economic climate, job uncertainty and fear of redundancies. We have ensured that robust grievance procedures and whistleblowing policies are in place and are accessible, along with other options such as confidential reporting hotlines or toll-free lines for counselling to ensure mental wellness.

The pandemic has 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.

### 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, online/card/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 Europe 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 review and update the Safeguarding Policy which clearly sets out our stance and lays out the procedure for reporting.

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# 6. Risk Assessment and Mitigation efforts



## Risk assessment

Tetra Tech Europe currently employs over 160 staff in the UK and in the EU (Netherlands, France, Belgium, Spain, Bulgaria, Poland, etc.), but also in Nigeria, Kenya and in Palestine/OTP. Most of our employees are employed on a full-time basis with fewer part-time employees. Our wider staff base is comprised of external project consultants. Our a dedicated risk and compliance team that 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 some 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 indirect risk associated with our delivery partners and supply chains.

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

- Downstream delivery partners on our economic growth and infrastructure programmes;
- Cleaning and catering services;
- Taxi/transport and security services;
- Hotel and restaurant services.

Regarding the risk involved with working in post-pandemic times, we've been proactive in ensuring that our staff, their families, and the people we work with are protected as best as possible. We continue to allow remote/home working with only essential in-person meetings. We have reduced the number of individuals who can access our offices at a time and heavily encouraged those who can effectively carry out their role off site or at home to continue doing so.

As a result of the pandemic our risk-profile has greatly reduced.

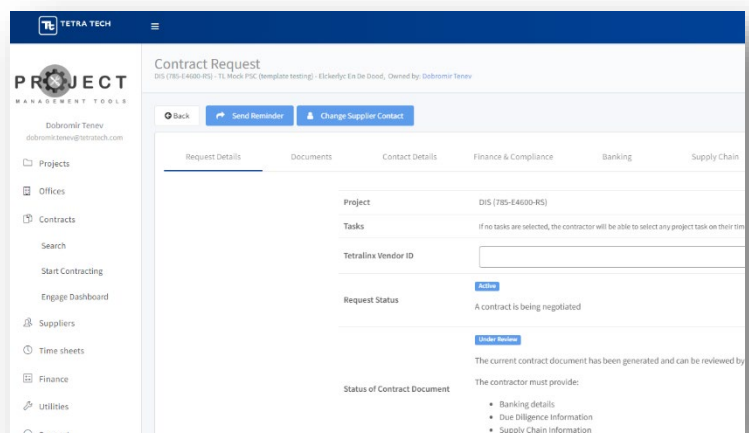
## Due Diligence and Contracting

### Supplier due diligence and local intelligence

We undertake thorough due diligence on each prospective employee and supplier prior to contracting. Staff are a vetted prior to employment for their right to work in the UK/relevant location of employment and criminal background to ensure their suitability for the role. Remuneration of employees and consultants is based on industry benchmarks.

For suppliers, due diligence, as a minimum, takes the form of completing an online form via our Engage online 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 that there are no historical or financial issues.

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.



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We use a comprehensive enhanced due diligence tool, Lexis Nexis, which collaborates with other verified world check systems to check that the suppliers we intend to work with are not on any blacklist or debarred or have been 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 (including in the new FY24 universal contract template) with all of our supply chain suppliers that they will adhere to the UK 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.

**Monitoring, evaluation and remedy.**

Tetra Tech Europe 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.

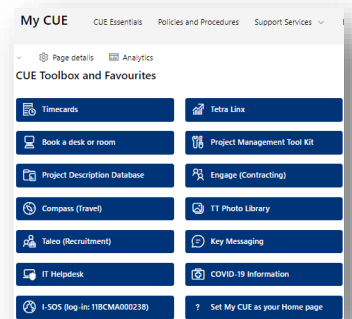
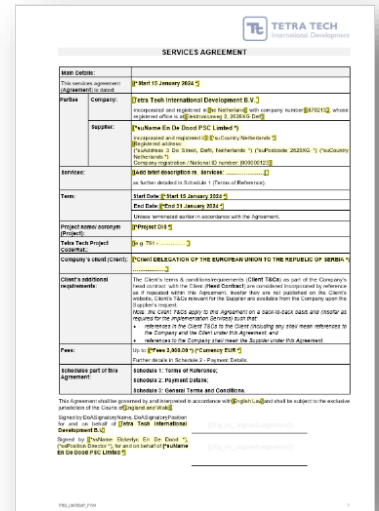
**Employee engagement and employment**

Tetra Tech Europe 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 senior management 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.

All ethical and modern slavery information and respective policies are also available for staff at Tetra Tech Europe's **MyCUE intranet page launched in 2023**.



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Some of our key projects in FY23 (ending September 2023):



Climate Resilient Infrastructure Development Facility



North Africa Technical Assistance Facility



United Kingdom Nigeria Infrastructure Advisory Facility



Economic Resilience Initiative – Infrastructure Technical Assistance



Western Balkans Investment Framework – Infrastructure Projects Facilities



Sustainable Urban Economic Development Programme



LINKS – Catalysing economic growth in Northern Nigeria



Transport and mobility – European institutions



Monitoring systems – European institutions

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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 (also covering the EU Whistleblowing Directive)

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

The policy, which is provided to all staff members and suppliers and published on MyCUE, 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 US 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 Europe'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 Europe employees on modern slavery, conflict of interest and anti-bribery, as well as on our Code of Conduct. We have prepared updated training materials that encompasses all these trainings. 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.

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## 7. Continually improving



We are always seeking ways to improve our approach to the UK 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 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.

One of our goals is to fully integrate Tetra Tech Europe's operations into a single approach. We have now trained and educated staff across all of our ethical policies to ensure that consistent approach is applied across all projects.

### 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 economic growth & 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 FY23 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 - <https://intdev.tetratecheurope.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 our suppliers/contractors/partners (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 Tetra Tech Europe's work, 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 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 modern slavery. Tetra Tech Europe's suppliers and employees are expected and annually 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 modern slavery;
- and commitment from our senior leadership team.



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