



TSA Riley

Modern Slavery Statement

FY 2026

September 2026



© Copyright TSA Riley. All rights reserved. No part of this document may be reproduced or transmitted, in any form or by any means, without the express permission of TSA Riley, unless specifically allowed for by the terms of a contractual agreement with TSA Riley.

Document Control

File location	https://tsamanagement.sharepoint.com/sites/ESGSector959/Shared Documents/Internal ESG/07 Modern Slavery Prevention/C Statements/FY2025-26 Group/Working documents/FY26 MS Statement Draft.docx		
Prepared for issue:	Lyndell Roberts	Date:	21 September 2026
Approved for issue:	Emma Sellick	Date:	22 September 2026



Contents

Executive Summary..... 3

1. Organisational Context 4

2. Policies11

3. Risk management14

4. Due diligence.....16

5. Training18

6. Assesses the effectiveness19

7. Other relevant information21

Statement approval.....22

Compliance mapping annexure23



Executive Summary

TSA Riley is committed to identifying, preventing and addressing modern slavery risks across its operations, supply chains and business relationships. This statement outlines the actions taken during FY26 and covers relevant Australian and United Kingdom entities within the group.

As a professional services organisation, TSA Riley's direct exposure to modern slavery risks is considered low. The Group's most significant potential exposures arise through construction-related value chains, client relationships, outsourced services, ICT supply chains and suppliers operating in higher-risk jurisdictions.

During FY26, TSA Riley strengthened its governance framework by recognising Modern Slavery Prevention as a standalone material Environment Social Governance (ESG) topic, supported by defined accountability through the Group Board, Chief Executive Officer and Chief Risk Officer, together with implementation of an Ethical Decision Framework.

Modern slavery risk management is supported through policies, annual risk assessments, targeted supplier reviews, due diligence processes and confidential reporting mechanisms.

No incidents of modern slavery were identified within TSA Riley's operations during the reporting period.

TSA Riley remains committed to continuous improvement through enhanced governance, training, supplier engagement and integration of modern slavery considerations into business and procurement processes.

1. Organisational Context

We help clients and communities realise the transformative power of their assets.

TSA Riley partners with public and private sector clients and delivery partners to navigate the critical decisions that shape successful property and infrastructure projects.

Through our connected intelligence – multidisciplinary expertise, global perspective and 135 years of independent thinking – we bring clarity to complexity and enable confident choices to help clients deliver assets that perform today and shape tomorrow.

We work across the full lifecycle of projects and asset portfolios – from planning to delivery and optimisation. With global expertise in project management, cost management, advisory, ESG, and asset management, our teams connect the interdependencies across the lifecycle to help clients unlock value at every stage.

Plan . Deliver . Optimise

We call this **Project Consulting**.



1.1 Organisation and supply chain structure

TSA Riley is a global project management, advisory and consulting organisation operating across Australia, New Zealand, Malaysia, the United Kingdom, Ireland and Canada. TSA Management Group Holdings Pty Ltd (ABN 37 622 812 177) is ultimately owned by Crane TopCo Pty Ltd (ABN 97 646 044 046), which is 34% owned by management shareholders - people who work in the business, with the remaining 66% a private equity firm.

This statement covers the operations and supply chains of TSA Riley Group entities within Australia, United Kingdom and Canada that are subject to modern slavery reporting requirements. The statement has been developed through consultation with relevant entities and representatives across the Group.

TSA Riley provides project management, cost management, advisory, ESG and asset management services across the property and infrastructure sectors.

As a professional services organisation, TSA Riley's direct supply chain primarily comprises suppliers that support its corporate and business operations. These include information technology and telecommunications providers, professional service firms, recruitment and labour support services, travel and accommodation providers, facilities management services, marketing and communications suppliers, insurance providers, and office-related goods and services. These suppliers are predominantly located in Australia, New Zealand, the United Kingdom and Ireland.

TSA Riley's indirect supply chain arises through project delivery and client-related activities within the built environment sector. These value chains may involve consultants, contractors, subcontractors, labour providers, and suppliers of construction materials and equipment operating across multiple jurisdictions. While TSA Riley does not typically procure construction materials or engage construction labour directly, it recognises that modern slavery risks may exist within these broader project-related supply chains and value-chain relationships.

TSA Riley delivers its services through employees and contractors. As a service-based organisation, its Tier 1 supply chain is relatively limited, with potential exposure to higher modern slavery risks generally concentrated within indirect and project-related supply chains.

During FY26, TSA Riley (group wide) employed approximately 1,000 employees globally and generated annual revenue of approximately \$240m.

1.1.1 The entities covered by this statement

This statement is made by TSA Management Group Holdings Pty Ltd (ABN 37 622 812 177) on behalf of the TSA Riley entities covered by this statement. This statement applies to the following entities:

Australian entities:	United Kingdom, Ireland, and Canada entities:
• TSA Management Group Pty Ltd (ABN 55 622 812 631)	• TSA Management UK Holdings Limited (Company Number 14726425)
• TSA Riley Pty Ltd (ABN 71 099 000 272)	• TSA Riley Limited (Company Number 14554456)
• TSA Riley (ACT) Pty Ltd (ABN 79 097 795 125)	• DGA (UK) Limited (Company Number 6614034)
• TSA Riley (SA) Pty Ltd (ABN 83 602 683 063)	• D2 Global Ltd (Company Number 07550270)
• TSA Riley (VIC) Pty Ltd (ABN 32 165 983 586)	• D2 Global Holdings Ltd (Company Number 15901573)
• TSA Riley (RGB Assurance) Pty Ltd (ABN 84 145 897 418)	• D2 Infrastructure Inc (Bus Number 766326409)
• Calcutta Group Pty Ltd (ABN 68 147 241 487)	• Chronos North Limited (Company Number 13707255)
• Footprint Holdings Pty Ltd (ABN 64 628 741 579)	
• The Footprint Company Pty Ltd (ABN 13 149 808 104)	
• The Footprint Calculator Pty Ltd (ABN 22 152 149 454)	
• Henry Riley Pty Limited (ABN 77 665 891 494)	
• DGA International Experts Pty Ltd (ABN 87 632 752 722)	

Australian entities are included as part of TSA Riley's reporting obligations under the Modern Slavery Act 2018 (Cth). United Kingdom entities are included to support compliance with section 54 of the Modern Slavery Act 2015 (UK) and TSA Riley's commitment to a group-wide approach to modern slavery prevention.

1.2 Supply chain understanding

TSA Riley has visibility over its direct (Tier 1) suppliers through procurement and finance records. The organisation has not yet comprehensively mapped Tier 2 and Tier 3 suppliers within project-related built-environment supply chains, including subcontractors, labour providers and the ultimate sources of construction materials.

As a professional services organisation, TSA Riley does not directly procure construction materials or engage construction labour. Accordingly, visibility and influence over labour conditions within lower-tier supply chains is more limited than for direct suppliers and is generally exercised through client, contractor and supplier relationships rather than direct contractual control.

Notwithstanding these limitations, TSA Riley undertakes due diligence as part of project delivery and procurement activities. This may include assessment of contractor and consultant procurement practices, consideration of labour and workforce risks, review of supplier policies and compliance requirements, and engagement with clients and project participants on environmental, social and governance (ESG) matters. These activities provide TSA Riley with a degree of visibility into potential modern slavery risks within project-related value chains, despite not having direct contractual relationships with lower-tier suppliers.

1.3 Products, sectors, and services

TSA Riley provides services across five capability areas: Project Management, Cost Management, Advisory, ESG, and Asset Management.



Project Management

- Project Establishment & Development
- Development Management
- Contract Procurement & Management
- Design Management
- Approvals & Compliance Management
- Construction & Delivery Management
- Completion & Handover Management



Cost Management

- Cost Planning & Benchmarking
- Cost Engineering
- Bill of Quantities
- Tendering & Procurement
- Contract Administration
- Commercial Management & Valuation
- Value Management
- Project Monitoring
- Life Cycle Costing



Advisory

- Economics & Business Case
- Procurement & Transaction Management
- Construction Assurance
- Systems Advisory
- Claims, Disputes & Expert Witness
- Health & Safety Advisory
- Communications & Stakeholder Engagement
- Change Management
- Project Governance & PMO
- Building Surveying
- Data & Digital Advisory
- Training



ESG

- ESG strategy, reporting and disclosure
- Carbon advisory
- Climate advisory
- Nature advisory
- Customer experience
- Social Impact
- Responsible procurement



Asset Management

- Strategic Asset Management
- Asset & Facilities Operations & Maintenance
- Asset Performance & Optimisation
- Information Systems & Analytics
- Asset Lifecycle Planning
- Asset Management Maturity

Services are delivered across two sectors: Infrastructure and Property.

Business-to-business spend on such suppliers amounted to 24% of our FY26 consolidated income across some 1,011 suppliers with payments ranging from \$1 to \$0.9m with an average spend of \$61,874 (group wide).



Property

Social Infrastructure, community and place

Arts and Culture
Corrections/Justice
Education
Emergency Services
Health
Science and Technology
Sports and Leisure

Residential

Aged Care
Housing

Commercial

Agriculture
Data Centres
Entertainment
Land Development
Logistics and Distribution
Manufacturing and Industrial
Office
Tourism and Hospitality
Retail



Infrastructure

Transport

Aviation
Ports
Rail
Road

Utilities

Energy
Water
Communications and Digital

Defence

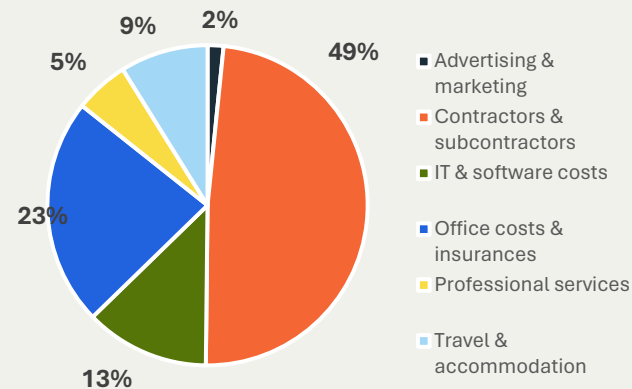
Resources and Waste

1.4 Direct and indirect suppliers

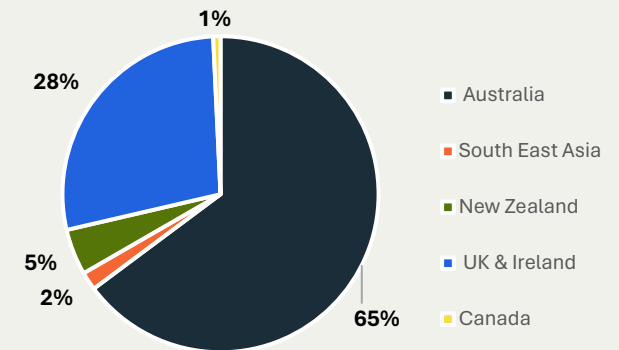
Direct suppliers are predominantly Tier 1 corporate and operational suppliers spanning advertising and marketing, contractors and subcontractors, IT and software, office costs and insurances, professional services, and travel and accommodation located mainly in Australia, the United Kingdom & Ireland, and New Zealand, and drawn from professional/business services, technology, and facilities services.

Indirect suppliers are primarily found within client project value chains and include contractors, subcontractors, labour providers and material suppliers involved in the delivery of built-environment projects. TSA Riley does not typically contract directly with these suppliers but may be linked to associated modern slavery risks through its project and client relationships.

% of TSA Riley spend by sub-category



% direct TSA Riley supplier spend by region



FY26 risk assessment identified cleaning services and electronics/ICT products as higher-risk indirect supplier categories. The assessment also identified supplier expenditure in jurisdictions associated with elevated modern slavery risks. These areas were prioritised for supplier due diligence activities.

1.5 Modern slavery risk management governance

Oversight of modern slavery risk sits with the TSA Riley Group Board. Responsibility for day-to-day management is delegated to the Chief Executive Officer (CEO), with operational oversight of modern slavery risk management supported by the Chief Risk Officer (CRO). This governance structure is supported by the Global Leadership Team (GLT) and TSA Riley's broader Integrated Management System and ESG framework, which identifies Modern Slavery Prevention as one of the Group's six material ESG topics.

1.6 Information gathering

In preparing this statement, TSA Riley consulted with relevant representatives from entities owned or controlled by TSA Management Group Holdings Pty Ltd. Consultation was undertaken through Group governance structures and regional leadership representatives to support identification of relevant modern slavery risks, mitigation measures and reporting obligations across the Group.

1.7 Stakeholder engagement

TSA Riley does not currently undertake formal consultation with external stakeholders specifically for the purpose of supply chain mapping. However, the organisation considers information obtained through supplier due diligence activities, supplier modern slavery statements, procurement reviews, project governance processes and publicly available guidance and risk sources when assessing modern slavery risks. TSA Riley also works with clients, contractors and project participants to encourage the application of modern slavery requirements and responsible labour practices within project delivery arrangements.

1.8 Continuous improvement

Since the FY25 statement, TSA Riley's most significant change has been extending its modern slavery reporting and consultation framework to cover United Kingdom, Ireland and Canada reporting entities for the first time, moving from an Australia-only statement to a broader statement covering Australia and the United Kingdom, Ireland and Canada.

During FY27, TSA Riley intends to further mature its modern slavery risk management framework across the Group. Key initiatives will include:

- Extending mandatory modern slavery awareness training to employees in additional jurisdictions, commencing with the United Kingdom, Ireland and Canada, with the objective of establishing a consistent Group-wide understanding of modern slavery risks and responsibilities.
- Further integrating modern slavery considerations into procurement, project delivery processes to strengthen identification, assessment and management of potential risks.
- Continuing to engage with suppliers, clients and project partners to promote awareness of modern slavery risks and encourage responsible business practices throughout the value chain.
- Monitoring regulatory developments across jurisdictions in which TSA Riley operates, including preparing for the introduction of anticipated modern slavery legislation in New Zealand and assessing any resulting changes required to policies, procedures and reporting frameworks.

2. Policies

2.1 Internal operating policies

TSA Riley's approach to identifying, preventing and responding to modern slavery is supported by a framework of governance, employment and procurement policies. Key policies include the Modern Slavery Policy, ESG Policy, Whistleblowing Policy, Anti-Bribery and Anti-Corruption Policy, Sustainable Procurement Policy, Appropriate Workplace Behaviour Policy, Workplace Anti-Bullying Policy and Supplier Code of Conduct. Together, these policies support ethical business conduct, respect for human rights, responsible procurement, fair treatment of workers, effective reporting of concerns, and governance oversight of modern slavery risks across the Group's operations and supply chains.

Primary policies

Policy	Purpose	Key Modern Slavery Controls
Modern Slavery Policy	Establishes TSA Riley's commitment to preventing modern slavery and human trafficking across its operations and supply chains.	Prohibits slavery, forced labour, debt bondage, trafficking, forced marriage and child labour; requires right-to-work checks; written employment terms; compliant wages and benefits; safe working conditions; and supplier compliance with modern slavery laws.
ESG Policy	Establishes TSA Riley's approach to environmental, social and governance matters and responsible business practices.	Supports commitments relating to human rights, labour standards, employee welfare, diversity and inclusion, health and safety, social responsibility and responsible supply chain management.
Whistleblowing Policy	Provides mechanisms for reporting actual or suspected misconduct and unlawful conduct.	Confidential and anonymous reporting channels, investigation procedures, whistleblower protections, support mechanisms and protection from retaliation.
Anti-Bribery and Anti-Corruption Policy	Promotes ethical business conduct and prevents bribery, corruption and unethical practices.	Due diligence requirements for commercial business partners, reporting obligations, investigation procedures and governance oversight of unethical conduct.
Ethical Decision Framework	Supports ethical and values-based decision-making across the organisation.	Requires consideration of stakeholder impacts, human rights risks and ethical concerns; establishes escalation pathways for red-line issues including human rights violations.
Supplier Code of Conduct	Establishes TSA Riley's expectations for suppliers, sub-consultants and business partners regarding ethical, sustainable and responsible business practices.	Requires suppliers to uphold human and labour rights, provide fair and safe working conditions, comply with applicable laws, and operate ethically, supporting the management of modern slavery and other human rights risks within the supply chain.



Supporting employment-related policies

Policy	Relevant modern slavery topic
Appropriate Workplace Behaviour Policy	Supports respectful treatment of workers and reporting of unacceptable conduct.
Workplace Anti-Bullying Policy	Addresses intimidation, coercion and abusive workplace behaviours.
Diversity, Equity & Inclusion Statement	Supports non-discrimination and equal treatment of workers.
IMS Health & Safety Policy	Supports safe working conditions, which is a key labour rights consideration.

Supporting procurement-related policies

Policy	Relevant modern slavery topic
Sustainable Procurement Policy	Responsible sourcing, supplier assessment and supply chain risk management

Collectively, these policies, governance arrangements and decision-making processes support TSA Riley's approach to identifying, preventing and responding to modern slavery risks across its operations, supply chains and business relationships.

2.2 International standards

TSA Riley's approach to modern slavery prevention is informed by internationally recognised human rights and responsible business frameworks, including the United Nations Guiding Principles on Business and Human Rights (UNGPs), the OECD Due Diligence Guidance for Responsible Business Conduct, and the International Labour Organization's core labour standards. These frameworks inform the organisation's governance arrangements, policies, risk assessment processes, due diligence activities and reporting mechanisms that support the identification, prevention and management of modern slavery risks across its operations and supply chains.

2.3 Stakeholder engagement

TSA Riley's modern slavery policies and governance arrangements are developed and implemented through collaboration between key internal stakeholders. These stakeholders include the Group Board, Global Leadership Team, Chief Executive Officer, Chief Risk Officer, procurement personnel, people and culture teams, and regional operational leaders. Together, these groups contribute to the development, implementation and periodic review of policies, governance arrangements and risk management processes relating to modern slavery prevention.

Where relevant, policy development and implementation activities are informed by legislative requirements, government guidance, industry developments and feedback obtained through operational and supplier due diligence processes.

2.4 Communication and enforcement

TSA Riley communicates relevant policies and governance requirements through its Integrated Management System, resources, onboarding processes, mandatory compliance training and leadership communications. Policies are accessible to all employees and are supported by management oversight and governance review processes. Modern slavery awareness training forms part of employee onboarding in Australia and is planned to be expanded through broader compliance and governance training initiatives across the Group.

The Whistleblowing Policy establishes multiple reporting channels, including authorised recipients, leadership and external regulators. Reports may be made anonymously and are managed in accordance with established investigation, confidentiality and protection requirements.

Compliance with policy requirements is supported through employee onboarding, mandatory training, management oversight, governance reporting, investigation procedures and, where necessary, disciplinary action. TSA Riley may also review supplier or commercial business partner relationships where actual or potential breaches of ethical, legal or modern slavery obligations are identified.

2.5 Continuous improvement

During FY26, TSA Riley strengthened its governance framework by recognising Modern Slavery Prevention as a standalone material ESG topic and implementing the Ethical Decision Framework. The organisation also undertook a broader review of its policy framework to support greater consistency, accessibility and alignment across regions.

During FY27, TSA Riley will continue to review and enhance its policy framework to support a consistent Group-wide approach to modern slavery prevention and evolving regulatory requirements. TSA Riley also intends to improve the accessibility of its modern slavery policies, including making the Modern Slavery Policy publicly available through its global website.

3. Risk management

3.1 Risk assessment frequency

Risk assessments are conducted as part of TSA Riley's annual business review cycle, which includes review of the risk assessment methodology to ensure it remains effective and compliant with relevant legislation.

3.2 Risk assessment governance

Responsibility for assessing and managing modern slavery risks sits with the Global Leadership Team, supported by TSA Riley's ESG governance arrangements and broader risk management framework. Oversight extends across the Group's operations and supply chains, including Australia, the United Kingdom & Ireland, and Canada.

Modern slavery risk management is governed through TSA Riley's ESG Framework, which identifies Modern Slavery Prevention as a material topic for the Group. Responsibility is assigned to the Group Board, Chief Executive Officer and Chief Risk Officer, who oversee risk assessments, compliance activities, reporting obligations and improvement initiatives. Modern slavery risk management is integrated with TSA Riley's broader governance, risk and compliance processes.

Risk assessment activities are informed by procurement information, supplier reviews, operational risk assessments and relevant external risk indicators. Governance oversight is supported through the Policy and Ethical Decision Frameworks.

3.3 Identifying and assessing risks

TSA Riley applies a risk-based approach to identifying and assessing modern slavery risks across its operations, supply chains and business relationships. Risk assessments consider supplier location, supplier spend, industry sector, workforce vulnerability, geographic risk and the nature of products and services procured.

The organisation draws upon publicly available risk sources, including the Global Slavery Index, alongside internal supplier reviews and procurement data. Consideration is also given to project delivery activities, client relationships and broader value-chain exposures associated with the built environment sector.

3.4 Highest priority risks to workers

As a professional services organisation, TSA Riley considers the risk of modern slavery within its directly employed workforce to be low. Employees are predominantly qualified professionals engaged under formal employment arrangements within jurisdictions that have established labour laws, workforce protections and grievance mechanisms.

TSA Riley considers its highest priority modern slavery risks to workers arise within supply chains and project-related value chains where the organisation may be directly linked to modern slavery risks through business relationships. Areas of focus include:

- Electronics and ICT equipment supply chains, where manufacturing may occur in higher-risk jurisdictions and involve complex multi-tier supply chains.
- Cleaning, facilities management and other outsourced services, which may rely on vulnerable workers and subcontracting arrangements.
- Branded apparel, uniforms, promotional merchandise and PPE, sourced through international manufacturing supply chains.
- Built-environment value chains, involving construction labour, subcontracting arrangements and construction material supply chains where TSA Riley may be directly linked to modern slavery risks through project delivery and advisory activities.
- Projects delivered in higher-risk jurisdictions and engagements with clients operating in sectors or regions with elevated human rights and labour exploitation risks.

Worker groups that may be exposed to elevated modern slavery risks within these supply chains include migrant workers, temporary workers, low-skilled labourers and workers engaged through complex subcontracting arrangements.

3.5 Stakeholder engagement

TSA Riley's assessment of modern slavery risks is informed primarily through internal governance processes, procurement reviews, operational knowledge and recognised external sources.

Risk assessments are supported by publicly available guidance, legislation and recognised risk assessment resources, including the Global Slavery Index and government guidance relating to modern slavery reporting obligations. These sources assist TSA Riley in identifying higher-risk countries, sectors, workforce characteristics and supply chain activities that may be associated with increased risks of modern slavery.

TSA Riley's engagement with external stakeholders for the purpose of risk identification is currently limited. However, information obtained through supplier due diligence activities, supplier modern slavery statements and project delivery processes may also contribute to the organisation's understanding of emerging modern slavery risks.

3.6 Continuous improvement

During FY26, TSA Riley expanded its modern slavery risk assessment activities to support a broader Group-wide reporting framework encompassing Australia, the United Kingdom, Ireland and Canada. This improved visibility of regional operations, supply chains and reporting obligations.

During FY27, TSA Riley intends to improve visibility of higher-risk built-environment supply chains through enhanced supply chain mapping and risk assessment activities.

4. Due diligence

4.1 Prevention and mitigation

TSA Riley seeks to prevent and mitigate modern slavery risks through governance arrangements, policies, due diligence activities and reporting mechanisms designed to promote ethical business conduct and respect for human rights.

Key measures include implementation of the Modern Slavery Policy, ESG Policy, Whistleblowing Policy and Anti-Bribery and Anti-Corruption Policy; right-to-work verification checks; written employment terms and conditions; governance oversight; annual risk assessment activities; supplier review processes; know your client checks; and confidential reporting mechanisms.

TSA Riley also applies an Ethical Decision Framework that supports consideration of stakeholder impacts, human rights concerns and ethical risks when making decisions relating to projects, clients and business opportunities. Human rights violations are identified as a red-line issue requiring additional governance review and escalation.

4.2 Supplier and worker engagement

TSA Riley adopts a risk-based approach to supplier due diligence. While detailed modern slavery assessments are not routinely undertaken for all suppliers, those presenting elevated risk indicators, such as geographic, sector or workforce-related risks, may be subject to further review. This may include reviewing modern slavery statements, requesting supplier information, or assessing governance and risk management practices.

TSA Riley also encourages consideration of modern slavery risks through its procurement and project delivery activities, promoting responsible labour practices and appropriate supplier oversight.

For its direct workforce, TSA Riley provides employees and contractors with access to management reporting channels, grievance processes and whistleblowing mechanisms that enable concerns regarding unethical conduct, human rights issues or suspected modern slavery risks to be raised confidentially and, where permitted, anonymously.

TSA Riley does not currently undertake formal engagement with organisations representing people with lived experience of modern slavery. As the organisation's modern slavery programme matures, opportunities to strengthen engagement and collaboration with external stakeholders will continue to be considered.

4.3 Human rights due diligence approach

TSA Riley's approach to identifying and managing human rights and modern slavery risks is supported by its Modern Slavery Policy, ESG Policy, Supplier Code of Conduct, Whistleblowing Policy, Anti-Bribery and Anti-Corruption Policy, and Ethical Decision Framework. These governance arrangements support risk identification, ethical decision-making and risk management across the organisation's workforce, operations, supply chains and business relationships.

Responsibility for oversight of human rights and modern slavery risks sits with the Group Board and is delegated through the Chief Executive Officer and Chief Risk Officer. Human rights and modern slavery risks are considered through workforce practices, supplier due diligence, risk assessments and governance processes. The Ethical Decision Framework requires escalation of potential human rights violations and other defined red-line issues, while the Supplier Code of Conduct establishes expectations regarding human rights, labour standards, safe working conditions and ethical business practices across TSA Riley's supply chain.

4.4 Grievance mechanisms

TSA Riley maintains formal grievance and whistleblowing mechanisms that provide employees and other eligible stakeholders with avenues to raise concerns regarding actual or suspected misconduct, unlawful conduct or unethical behaviour.

The Whistleblowing Policy applies to employees, contractors, subcontractors, labour hire workers, suppliers and other eligible persons. Reports may be made through authorised recipients, senior managers, external regulators or legal representatives. Anonymous disclosures are permitted and individuals may remain anonymous throughout the investigation process.

The policy provides protections relating to confidentiality, protection from retaliation and independent investigation of concerns. Support services are also available to individuals affected by the reporting process where appropriate.

4.5 Remediation policies and processes

Where actual or suspected instances of modern slavery, human rights abuse or related misconduct are identified, TSA Riley's governance framework provides mechanisms for escalation, investigation and review. Matters involving human rights concerns may be escalated through the organisation's ethics and governance processes for assessment and decision-making. Issues may also be raised through whistleblowing and other reporting mechanisms which support confidential investigation and corrective action.

TSA Riley recognises that formal remediation arrangements continue to evolve and intends to further strengthen its approach as governance frameworks mature.

4.6 Incidents of modern slavery

For FY26, TSA Riley received no complaints, enquiries, or information suggesting modern slavery had occurred in its supply chain.

4.7 Business model

As a professional services organisation, TSA Riley's direct operational exposure to modern slavery risks is considered low. The organisation does not manufacture goods, directly procure construction materials, or employ construction labour. Most employees are skilled professionals engaged under formal employment arrangements within regulated labour markets.

TSA Riley recognises, however, that its business activities may be directly linked to modern slavery risks through supply chains, client relationships and project-related value chains. Projects involving construction labour, subcontracting arrangements, outsourced services and internationally sourced goods may present elevated modern slavery risks. Procurement decisions, project delivery approaches and the selection of clients, suppliers and business partners may influence the organisation's exposure to these risks.

4.8 Continuous improvement

During FY26, TSA Riley continued to apply a risk-based approach to modern slavery due diligence through supplier reviews, risk assessments, governance processes and project delivery activities. The organisation also strengthened the integration of modern slavery considerations within its ESG and governance framework.

During FY27, TSA Riley intends to strengthen supplier and contractor due diligence processes, particularly within higher-risk built-environment supply chains.

5. Training

5.1 Internal and external training

Modern slavery awareness forms part of TSA Riley's broader governance, compliance and ESG programme. Since 2023, all Australian employees have completed mandatory modern slavery awareness training during onboarding. The training introduces employees to modern slavery risks, relevant legislation, indicators of labour exploitation, reporting obligations, supplier risks and TSA Riley's governance framework for identifying and responding to concerns.

5.2 Training programme materials

Training materials include modern slavery awareness modules, policy documentation, onboarding resources and guidance materials designed to support employee understanding of modern slavery risks and reporting obligations. Content covers modern slavery definitions, common risk indicators, governance responsibilities, reporting pathways and practical examples relevant to TSA Riley's operations, supply chains and business relationships.

TSA Riley also promotes awareness through policy updates, governance communications and ESG-related information that supports responsible business conduct and ethical decision-making.

5.3 Training package development

TSA Riley's modern slavery awareness programme has been developed internally using guidance published under the Australian Modern Slavery Act, Australian Government guidance for reporting entities, the Global Slavery Index, international reporting guidance and other recognised human rights and modern slavery resources. Content is reviewed periodically to support alignment with legislative developments, organisational requirements and emerging best practice.

5.4 Continuous improvement

During FY26, TSA Riley continued to provide mandatory modern slavery awareness training to Australian employees as part of its onboarding and compliance programme. The organisation also began planning for a broader Group-wide training approach aligned with expanding reporting obligations and governance arrangements.

During FY27, TSA Riley will expand modern slavery awareness training to employees in the United Kingdom, Ireland and Canada.

6. Assesses the effectiveness

6.1 Goal setting & Key Performance Indicators

TSA Riley recognises that assessing the effectiveness of modern slavery risk management activities is an important component of continuous improvement. During FY26, the Group strengthened its approach to performance measurement by establishing FY27 objectives and key performance indicators to support monitoring of governance, risk management, due diligence and training activities. These objectives and indicators provide a foundation for more structured and outcome-focused effectiveness reporting in future reporting periods.

FY27 Goal	KPI
Expand mandatory modern slavery awareness training across the United Kingdom, Ireland and Canada.	Training completion rate by relevant region.
Strengthen supplier and contractor due diligence processes.	Number of higher-risk suppliers and contractors reviewed.
Further integrate modern slavery considerations into procurement, project delivery and contractor management processes.	Implementation status of modern slavery requirements within procurement, project governance and contractor management processes.
Maintain compliance with applicable modern slavery legislative and reporting requirements.	Annual reporting obligations completed.
Monitor and prepare for emerging regulatory requirements, including regulatory developments in New Zealand.	Regulatory developments monitored and implementation actions completed as required.

6.2 Monitoring and evaluation governance

Monitoring and evaluation of modern slavery activities is overseen by the Group Board and delegated through the Chief Executive Officer to the Chief Risk Officer. Progress against commitments, actions and indicators is monitored through TSA Riley's ESG Framework and governance reporting processes.

6.3 Use of data

TSA Riley uses both quantitative and qualitative information to assess effectiveness, including risk assessment outcomes, supplier review results, training metrics, statement publication status, due diligence implementation progress and mitigation activities arising from identified risks.

6.4 Evidencing outcomes

During FY26, TSA Riley strengthened its modern slavery governance framework through the recognition of Modern Slavery Prevention as a standalone material ESG topic, implementation of the Ethical Decision Framework, and expansion of its reporting framework to incorporate reporting entities in Australia, the United Kingdom, Ireland and Canada. Modern slavery awareness training continued as part of employee onboarding and annual risk assessments were undertaken. During the reporting period, 5 suppliers were identified as exhibiting one or more modern slavery risk indicators and two suppliers were subject to further review as part of TSA Riley's risk-based due diligence process. No incidents or allegations of modern slavery were identified within TSA Riley's operations or through these due diligence activities. These outcomes establish a baseline against which future progress and performance can be assessed.

6.5 Utilising findings

Findings from FY26 risk assessments, supplier reviews and governance activities informed the development of TSA Riley's FY27 modern slavery priorities. In particular the need for strengthened supplier and contractor due diligence and expanded employee awareness training. These findings have informed the Group's planned FY27 initiatives and will continue to guide future risk management and continuous improvement activities.

6.6 Success stories

During FY26, TSA Riley strengthened its governance approach through implementation of its Ethical Decision Framework. The framework provides leaders with a structured process for assessing complex business decisions against organisational values, stakeholder impacts, ethical risks and governance requirements.

The framework identifies specific red-line issues, including human rights violations, corruption concerns and significant environmental harm, which require escalation for review and consideration. By embedding these requirements into decision-making processes, TSA Riley has strengthened its ability to identify and respond to potential modern slavery and broader human rights risks across its operations and business relationships.

These improvements support TSA Riley's broader commitment to responsible business conduct and continuous improvement in managing modern slavery risks.

6.7 Stakeholder engagement

TSA Riley's assessment of effectiveness is informed through governance processes, risk assessments, procurement reviews and engagement with internal stakeholders, including operational leaders, procurement personnel, people and culture representatives and regional leadership teams.

6.8 Continuous improvement

During FY27, TSA Riley will monitor performance against the goals and key performance indicators established in this statement. Findings from risk assessments, supplier engagement, due diligence activities and training outcomes will be used to inform future improvements to governance, supply chain risk management and modern slavery prevention activities across the Group. These initiatives support TSA Riley's continued transition towards a more structured and outcome-focused approach to assessing effectiveness.

7. Other relevant information

7.1 Year-on-year progress

Since the FY25 reporting period, TSA Riley has continued to mature its approach to modern slavery risk management and reporting. The most significant development during FY26 was the transition from an Australia-focused reporting approach to a broader group-wide framework that incorporates United Kingdom reporting requirements and supports greater consistency across regions. This reflects TSA Riley's growing international footprint and commitment to maintaining a consistent approach to identifying and addressing modern slavery risks across its operations and supply chains.

To support this transition, TSA Riley adopted the International Reporting on Modern Slavery, Forced Labour and Child Labour template, promoting greater consistency, transparency and comparability across reporting jurisdictions and aligning with the organisation's broader group-wide reporting approach.

During the reporting period, TSA Riley strengthened governance arrangements through implementation of its ESG Framework, which identifies Modern Slavery Prevention as a standalone material topic and establishes clear accountability.

TSA Riley further enhanced its approach to human rights and modern slavery risk management through implementation of the Ethical Decision Framework. The framework supports consideration of stakeholder impacts, human rights concerns and ethical risks when evaluating business decisions, client relationships and project opportunities, and identifies human rights violations as a red-line issue requiring escalation and additional governance review.

7.2 Challenges in responding to requirements

TSA Riley has greater visibility of its direct (Tier 1) suppliers than the project-related value chains in which it operates. While the organisation maintains visibility over direct suppliers through procurement and finance systems, visibility of lower-tier suppliers, subcontractors, labour providers and construction material supply chains remains limited.

As a project consultancy operating across multiple jurisdictions, TSA Riley may be linked to modern slavery risks through client relationships and broader built-environment value chains over which it does not have direct control. Understanding and identifying these risks can be challenging where labour practices are not readily visible or exploitation may be hidden or underreported and remains an ongoing area of focus.

7.3 Additional information

During FY26, TSA Riley adopted the structure of the International Reporting on Modern Slavery, Forced Labour and Child Labour template jointly developed by the Governments of Australia, the United Kingdom and Canada. While voluntary, the template supports greater consistency, transparency and comparability across jurisdictions and aligns with TSA Riley's transition toward a group-wide reporting approach.

This reporting approach supports TSA Riley's commitment to continuous improvement and reflects the organisation's intention to strengthen governance, transparency and human rights due diligence as modern slavery reporting expectations continue to evolve internationally.



Statement approval

Principal governing body approval

This Modern Slavery Statement was approved by the principal governing body of TSA Management Group Holdings Pty Ltd in accordance with section 13 of the Modern Slavery Act 2018 (Cth) on 23 September 2026.

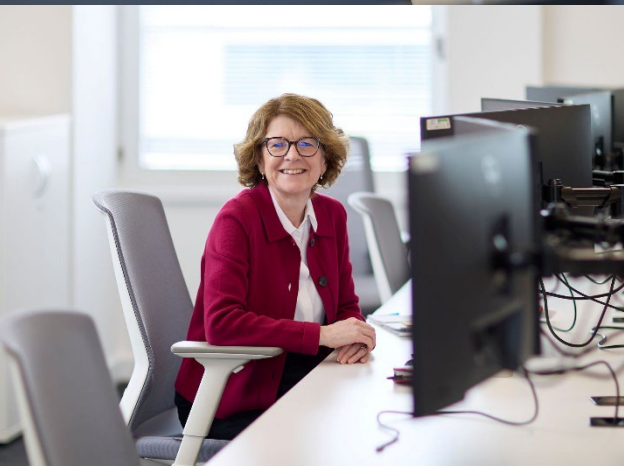
This statement has also been approved for the purposes of section 54 of the Modern Slavery Act 2015 (UK) and applies to relevant TSA Riley operations and supply chains in the United Kingdom and Ireland.

Signature of responsible member

This Modern Slavery Statement is signed by a responsible member of TSA Management Group Holdings Pty Ltd for the purposes of the Modern Slavery Act 2018 (Cth) and Modern Slavery Act 2015 (UK) and on behalf of the TSA Riley Group.

A handwritten signature in green ink, appearing to read 'AT', with a long horizontal stroke extending to the right.

Andrew Tompson
Chief Executive Officer
TSA Riley



Compliance mapping annexure

Australian Modern Slavery Act 2018 (Cth)

With reference to section 16 of the Modern Slavery Act 2018 (Cth).

Mandatory Criteria	Page number/s
a. Identify the reporting entity.	1 Organisational Context
b. Describe the reporting entity's structure, operations and supply chains.	1.1 Organisation and supply chain structure
c. c. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	3 Risk management
d. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	2 Policies, 4 Due diligence, 5 Training
e. Describe how the reporting entity assesses the effectiveness of these actions.	6 Assesses the effectiveness
f. Describe the process of consultation with any entities the reporting entity owns or controls.	1.6 Information gathering
g. Any other relevant information.	7 Other relevant information



United Kingdom Modern Slavery Act 2015

The disclosure requirements of section 54(5)(a)-(f) of the UK Modern Slavery Act 2015 have been addressed throughout this statement as outlined below.

UK Transparency in Supply Chains Provision	Statement Section
Organisation structure, business and supply chains	1. Organisational Context
Policies relating to modern slavery	2. Policies
Risk management	3. Risk management
Due diligence processes	4. Due diligence
Training	5. Training
Effectiveness	6. Assesses the effectiveness



TSA Riley

tsariley.com

Australia | Canada | Malaysia | New Zealand |
United Kingdom & Ireland