

MODERN SLAVERY JOINT STATEMENT

1 July 2024 to 30 June 2025



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The SAGE Group shares a collective commitment to making our world smarter, safer and more sustainable: for everybody, everywhere. In support of this mission, SAGE is committed to a better world where Modern Slavery has no place in its supply chain.

1. Introduction

This Modern Slavery Statement (**Statement**) is produced by SAGE Group Holdings (ACN 093 581 330) (**SAGE**), a reporting entity under the *Modern Slavery Act 2018* (Cth) (Act). As such, this Statement is designed to identify, assess and address the risks of Modern Slavery in its supply chain and operations. This Statement will also cover SAGE Automation Pty Ltd (ACN 104 119 833) (**SAGE Automation**), a wholly owned and controlled entity of SAGE, and a reporting entity under the Act. SAGE submits this Statement as a joint statement on behalf of both reporting entities.

2. Structure and Operations

On 27 June 2025, SAGE was acquired by Tetra Tech Australia Group Holdings Pty Limited (TTAGHL). TTAGHL is a wholly owned subsidiary of Tetra Tech Inc, a company listed on NASDAQ. SAGE's head office remains in Tonsley, South Australia. SAGE has a workforce of more than 800 people across Australia and India. Our offices are located around the major cities of New South Wales, Northern Territory, Queensland, South Australia, Tasmania, Victoria, and Western Australia, as well as regional offices in Geelong, Whyalla and Alice Springs. Our office in India is in Pune. SAGE is also currently operating in Pakistan, providing engineering services in support of a major infrastructure upgrade.

SAGE is the parent entity of four innovative and specialist companies within the sectors of defence, energy, transport, resources, utilities, and manufacturing. Together, these companies deliver services including end-to-end automation project delivery, Australian-based manufacturing, support and maintenance services, digitalisation consulting, resource capability and upskilling workforces with skills of the future.

SAGE undertakes its business activities under its subsidiaries, rather than through SAGE as the parent entity. Accordingly, this Statement covers the activities of all SAGE subsidiaries from 1 July 2024 to 30 June 2025 (**Reporting Period**). SAGE wholly owns and controls all its subsidiaries, with the exceptions of Nukon Pty Ltd, and SAGE Automation India PVT Ltd, which are controlled by SAGE but not wholly owned.

- SAGE Automation Pty Ltd specialises in automation and control system engineering, delivery and support, providing smart automation solutions. Its manufacturing operations assemble control cabinets and switchboard solutions.
- SAGE Automation India PVT Ltd provides the same specialist automation and control solutions as SAGE Automation Pty Ltd.
- Nukon Pty Ltd specialises in software and systems engineering, developing products and delivering high-end digital solutions that increase operational efficiency, service level, quality and other business outcomes.
- Embedded Expertise Pty Ltd is a specialist consultancy labour hire business, placing technical specialists into businesses.

- Skills Lab Pty Ltd is a registered training organisation in Australia where expert trainers, backed by SAGE Automation's foundations in smart systems and technology, equip the workforce with current knowledge through hands-on learning in specialist areas of industrial automation and control, instrumentation, big data analytics and hazardous area electrical equipment management.



SAGE has two manufacturing facilities, which are located at SAGE's head office in Tonsley, South Australia. SAGE employees work in our offices, at various client sites in both metropolitan and rural areas and remotely from their homes. SAGE's team in India is made up of engineers and other technical experts who generally work in the office.

3. Supply Chain and Operations

SAGE utilises an extensive supply chain of material suppliers, contractors, labour hire and offshore resources to deliver its products and services. SAGE engages approximately 750 suppliers, of which approximately 95% are Australian companies or Australian-based subsidiaries. SAGE procures its primary and recurring goods and services from its preferred suppliers. These preferred supplier relationships are well established and long-term. SAGE also has many short-term supplier relationships that it uses on an ad hoc basis. Suppliers are selected based on project specification, quality, risk, warranty, delivery times, price, after-sales support and compliance with SAGE's terms and policies.

The manufacturing, industrial automation, electronics, telecommunications, Information and Communication Technology (ICT), transport, and traffic management industries make up the majority of SAGE's supply chain. This supply chain can be divided into two categories of products and services as set out below.

Supply chain used in products and services that SAGE deliver:

Manufacturing electrical equipment and electronics such as switchboards, power supplies and cables; LEDs, protective coatings, telecommunications, industrial automation materials, Information and Communication Technology (ICT), pneumatics, timber packaging, traffic signal controllers, detection systems, industrial cleaning equipment, transport, freight, craneage and labour services via contractors.

Supply chain not used in products and services that SAGE deliver:

Professional services, finance and banking, cleaning and facility management services, work uniforms, storage and waste disposal services, insurance, motor vehicle rental, kitchen supplies, branded merchandise, office materials, travel services, mobile phones and information technology equipment such as computers, monitors and drives.

As approximately 95% of our supply chain is comprised of Australian companies or subsidiaries, we perceive working with Australian suppliers as a risk mitigation strategy, as our Australian suppliers are expected to adhere to Australian Modern Slavery laws, which are amongst the most developed globally. Further, our suppliers are required to either have their own Code of Conduct or agree to SAGE's Corporate Responsibility

Charter which requires suppliers to take action to identify, prevent and reduce Modern Slavery risks in their supply chains. In addition, our suppliers' contracts often incorporate Modern Slavery clauses to ensure suppliers respond to Modern Slavery risks appropriately and act to eliminate all forms of Modern Slavery.

4. Risks of Modern Slavery

While SAGE does not directly engage in Modern Slavery practices, we recognise that there are Modern Slavery risks that we may be directly linked to or contribute to due to how our procured goods and services are produced, provided or used; the characteristics of the industries that those goods and services are part of; and the prevalence of Modern Slavery in specific source countries. For SAGE, Modern Slavery risks refer to the risk of harm to people in our operations and supply chain rather than an entity risk.

This reporting period we sent thorough questionnaires to our top 100 suppliers by spend to find out:

- The countries our Tier 1 suppliers source goods and materials from;
- Where their business is conducted;
- What measures/ policies they have in place for Modern Slavery;
- How they prevent and mitigate risks of Modern Slavery; and
- Whether regular audits of their operations and supply chain are conducted.

We received 91/100 responses from our Tier 1 suppliers reporting that there are no Modern Slavery risks within their operations or direct supply chain. Since our last reporting period we have halved the number of our suppliers and received 11 additional responses from our top 100 suppliers. This additional oversight into our supply chain provides us with reassurance that our major suppliers are complying with their Modern Slavery obligations.

Whilst SAGE is satisfied that the risk of Modern Slavery within our business operations and supply chain is minimal this reporting period, we recognise the following risk areas, given the industry we operate in:

Electronics:

Several of SAGE's suppliers belong to the electronics industry and provide SAGE with electrical components. Some of our other suppliers provide the business with its computers, laptops and mobile phones. China is a major supplier of electronic circuits and products to Australia, providing over 70% of the Australian market's electronics. SAGE deems this level of exposure to the Chinese market, as a high-risk industry for our business. As of 2024, Australia imports approximately US\$75.7 billion products from China, many which are at-risk of being made using forced labour.¹ Malaysia is also a significant importer, with Australia importing around US\$11.86 billion worth of goods from Malaysia in 2024. Considering that, as of a 2021 statistic from the Global Slavery Index, an estimated 5.8 million people are living in Modern Slavery in China, SAGE recognises that computers, laptops and mobile phones imported from China and Malaysia are high-risk products potentially linked to Modern Slavery, where forced labour and child labour are associated with their manufacturing.

As reported in Trading Economics in 2025, Australia imported approximately US\$15.74 billion in electronics from China in 2024, making it Australia's highest-value at-risk import. Several of our suppliers listed China as one of their source countries for electrical equipment and ICT. Additionally, a portion of SAGE's company mobiles are Apple iPhones. Multiple investigative reports by China Labour Watch allege instances of exploitation and forced labour at some of Apple's largest suppliers in China³.

Conflict Minerals:

Raw minerals used in electronics manufacturing are often sourced from conflict-affected countries with weak governance structures. This significantly contributes to the prevalence of the worst forms of Modern Slavery. SAGE recognises that although we have little to no visibility of potential practices, this is a risk further upstream in our supply chain.

Clothing Industry / Cotton:

Garments and textiles produced in China are at risk goods as forced labour, child labour and slavery are prevalent. China is Australia's largest at-risk apparel import source by volume. A large portion of the uniforms that SAGE purchases are made in China; however, we source our uniform from one Australian supplier, who sources products in an ethical, responsible manner and is bound by Australian Modern Slavery legislation.

Cleaning services:

The cleaning industry is a high-risk industry for Modern Slavery in Australia. Withholding of wages, immigration-related coercion and threats, deceptive recruitment, excessive overtime, debt bondage, confiscation of personal and travel documents, and dangerous and substandard working conditions are all practices that are found in the cleaning industry in Australia. Cleaning services support our Australian and Indian offices. SAGE recognises that cleaning services currently presents a risk within our supply chain but like most of our suppliers, we engage reputable Australian companies who are compliant with Australian Modern Slavery legislation to reduce potential risks of Modern Slavery.

Labour Hire Arrangements:

Workers in the labour hire industry are often exploited and underpaid. SAGE engages labour providers in addition to one of our entities, Embedded Expertise, being a labour-hire business.

Embedded Expertise holds all labour hire licences as required under legislation. These laws aim to protect labour hire workers from exploitation. The professionals we connect our clients with are technical experts in various fields, including engineering and project management. The majority of Embedded Expertise's clients operate in the water, transport, energy and mining industries. SAGE does not embed people in industries that are widely exposed to risk, such as agriculture and meat-processing.

SAGE uses labour hire companies to supplement its workforce. Labour hire providers are required to be pre-qualified in SAGE's contractor management system. We conduct internal checks to identify whether any existing labour hire providers have not been set up on the contractor management system. Any labour hire providers who have not been through the pre-qualification process will be added into SAGE's contractor management system to ensure compliance with the pre-qualification requirements.

¹ Walk Free Foundation 2023, Global Slavery Index, available from: <https://www.walkfree.org/global-slavery-index/country-studies/Australia/>

² Walk Free Foundation 2023, Global Slavery Index 2023, Available from: <https://cdn.walkfree.org/content/uploads/2023/05/17114737/Global-Slavery-Index-2023.pdf>

³ China Labor Watch 2017, A Year of Regression in Apple's Supply Chain: Pursuing Profits at the Cost of Working Conditions. Available from: http://www.chinalaborwatch.org/upfile/2017_05_03/20170517.pdf. [19 December 2017]; China Labor Watch 2023, Investigation of an Apple Supplier: Pegatron Kunshan Report in 2023. Available at: <https://chinalabor.wpenginepowered.com/wp-content/uploads/2023/09/Pegatron-Kunshan-2308.pdf> [August 2023].

5. Actions taken to assess and address risks

SAGE's Standard Terms and Conditions for Suppliers (**Supplier Terms**) require our suppliers to sign and adhere to the SAGE Group Corporate Responsibility Charter (**Charter**) or a code of conduct substantially equivalent to the Charter. SAGE suppliers must agree to comply with the requirements of the Charter, including compliance with all laws of the countries within which they operate. This includes, without limitation, laws that:

- Protect human rights,
- Prohibit human trafficking,
- Combat corruption, money laundering, and terrorism,
- Ensure data protection and privacy,
- Regulate international trade,
- Promote workplace health and safety, and
- Safeguard the environment.

The Charter also requires that the supplier:

- ensures that their own suppliers, contractors and sub-contractors comply with the requirements of the Charter;
- agrees to notify SAGE promptly of any actual or suspected breach of this Charter whether committed or allegedly committed by SAGE staff or supplier's staff, subcontractors or suppliers;
- must provide their staff with mechanisms for raising legal or ethical issues or concerns with management without fear of retribution; and
- acknowledges that their non-compliance with the Charter may constitute a breach of their contractual obligations to SAGE which may involve, depending on the severity of the breach, the termination of their contract with SAGE.

As the majority of SAGE's suppliers are engaged on SAGE's Supplier Terms most SAGE suppliers agree to comply with all anti-slavery and human trafficking laws, including the Act and the *Modern Slavery Act 2018* (NSW) (if their business is conducted in NSW).

In addition to the above, the Supplier Terms require that the supplier:

- warrant that neither it nor its officers, employees, or related personnel have been convicted of any offence involving slavery or human trafficking, and that, to the best of its knowledge and after reasonable enquiries, the same is true of its supply chain.
- have in place and implement, appropriate anti-slavery and anti-trafficking policies, practices and procedures;
- incorporate into contracts with its supply chain, obligations equivalent to those set out in SAGE's Terms; and
- notify SAGE of any actual or suspected breach of the Terms by the supplier or any member of its supply chain, or any actual or suspected slavery or human trafficking in a supply chain related to the contract between SAGE and the supplier.

SAGE has a Whistleblower Policy available for all people who work for or with SAGE, including our suppliers and employees. This is publicly available on our website and on our internal company portal. The policy outlines a clear process on how to make a protected, and if necessary, anonymous, disclosure. SAGE encourages the reporting of any concerns regarding unethical or illegal conduct, including Modern Slavery. SAGE will investigate any grievances or concerns raised and address them appropriately, including by engaging with customers, suppliers and other stakeholders. Where necessary, SAGE will report matters to the appropriate authorities. During the Reporting Period, we distributed a reminder to all staff of SAGE's Whistleblower policy and procedure with an explanation of why we have it and how it works.

SAGE has a **Code of Conduct** which requires all employees and contractors to ensure that the risks of Modern Slavery within our business are adequately assessed and addressed to comply with the Act.

In relation to contractors, SAGE's compliance management program requires each contractor to agree to comply with both the SAGE Code of Conduct and the Charter before the contractor undertakes work for SAGE.

As part of our continuous improvement initiatives during this reporting period, SAGE has:

1. Updated its Modern Slavery Procedure (Procedure) to which all SAGE entities, directors, officers, senior managers, employees and contractors must adhere. This Procedure aims to ensure that SAGE manages all aspects of its operations and supply chains to assess and address risks of Modern Slavery.
2. Conducted numerous training sessions across the SAGE Group relating to Modern Slavery to provide training and development opportunities for all employees in attempt to procure products and services according to Modern Slavery legislation, set out the responsibilities of SAGE and its subsidiaries, employees, operations and suppliers in observing and upholding SAGE's position on Modern Slavery, and provide information and guidance to SAGE employees on how to recognise and report any Modern Slavery concerns.
3. Actively participated in providing detailed information to other businesses (upon request) regarding our operational practices and supply chain (by way of questionnaires, tender submissions and other correspondence).

In future reporting periods, SAGE will look to continue raising awareness within our business by training and development, regularly auditing our supply chain, engaging with our top suppliers to collect information and monitoring the effectiveness of our policies and procedures.

6. Remediation

SAGE has a high-level remediation plan that will be progressively developed into a more detailed process. If an incident of Modern Slavery occurs or is suspected, SAGE will, as soon as reasonably possible:

- hold an internal meeting at the Manager and Executive level; and
- co-operate and discuss the incident with the supplier directly to help them properly identify and remedy the issue.

SAGE's key objective will be to ensure that the incident has been effectively dealt with to remove any Modern Slavery from our operations whilst maintaining the relationship with that supplier, if possible.

If the supplier fails to take appropriate corrective action to eliminate the instance of Modern Slavery within a reasonable period of time, or the supplier takes the appropriate corrective measures, but those measures do not mitigate or eliminate the instance of Modern Slavery such that there are recurrences of the Modern Slavery activities in their operations, SAGE will again raise this with the supplier and may terminate the relationship.

7. Assessing Effectiveness

Overall, the requirement to comply with the Charter in order to be engaged as a supplier by SAGE has been an effective tool to measure supplier compliance or non-compliance with our Modern Slavery commitments during this reporting period. There are instances where SAGE engages suppliers on the suppliers' relevant terms and conditions, and such terms and conditions also include Modern Slavery obligations for suppliers. SAGE will continue to review supplier terms and conditions for Modern Slavery compliance obligations and negotiate their inclusion in the event that they are absent.

SAGE's grievance mechanism through our Whistleblower Policy tracks the number of concerns disclosed, investigated and resolved. There have been no reports of Modern Slavery related complaints through this mechanism during the Reporting Period. We recognise that this does not indicate the absence of Modern

Slavery in our supply chain as there may exist Modern Slavery practices further upstream in our supply chain which is less likely to result in a disclosure through SAGE's Whistleblower Policy.

SAGE assessed the effectiveness of the self-assessment questionnaires sent to our top 100 Suppliers by expenditure and recognises the limitations of the questionnaire. We strongly encouraged our suppliers to complete the questionnaire; however, several suppliers did not provide a response, which reduces the effectiveness of the questionnaire. Regardless, we are confident this tool provides us with insights that are applicable to this reporting period, especially with the increased response rate since last year's reporting period. We are also confident that supplier engagement will improve over future reporting periods as the Modern Slavery landscape continues to mature in Australia and globally.

We acknowledge the importance of measuring the effectiveness of our actions to properly mitigate and eliminate Modern Slavery within our business. SAGE will continue to explore and implement further measures to help adequately track the performance of our actions through a combination of internal and external mechanisms.

We will look to assess the effectiveness of our actions against the following in future reporting periods:

- Engagement with suppliers on Modern Slavery risks;
- Employee and management training;
- Internal and external audits;
- Supplier pre-qualification requirements;
- Targeted supply chain audits;
- Policy and process review;
- Board oversight;
- Key personnel meetings; and
- Contracts with Modern Slavery obligations.

8. Consultation process with entities owned or controlled

SAGE is the reporting entity for this Statement and provides this Statement on behalf of all entities owned or controlled by SAGE, including SAGE Automation. The controlled entities of SAGE all report to Tetra Tech Inc.

SAGE has prepared this Statement with input from the operational business units and the legal and procurement functions, which service all SAGE controlled entities.

9. Statement Approval

This Statement for financial year 2025 is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) and constitutes SAGE Group's Modern Slavery Joint Statement.

This Statement was approved by the SAGE Board of Directors on 17 December 2025. This Statement may be reviewed and updated as is necessary, annually.



Adrian Fahey
Group Managing Director

10. Revision History

Version History	Date	Revision
Version 1	17 Dec 2025	Original submission