

ERM Global Policy

Human Rights, Modern Slavery and Child Labor



1.0 PURPOSE

The purpose of this policy is to outline ERM's commitment and actions in support of international efforts to uphold human rights and against modern slavery and child labor. The policy is in alignment with the ERM Code of Business Conduct and Ethics, ERM's Annual Statements on Modern Slavery, and applicable international and national laws.

2.0 SCOPE

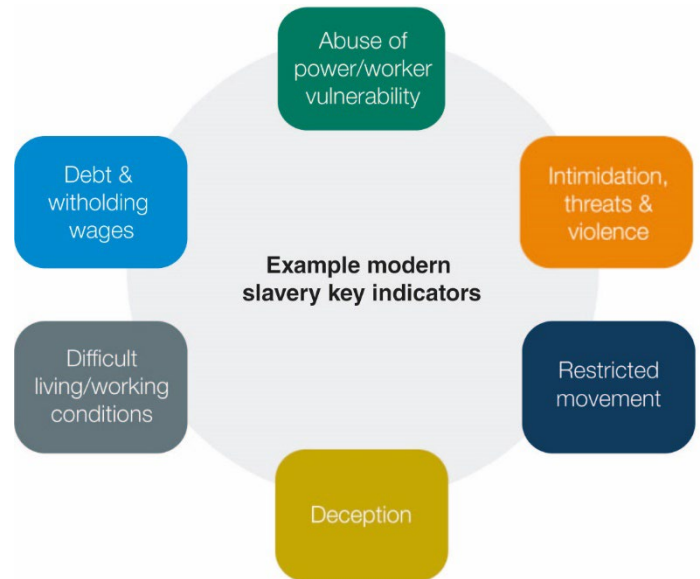
This Policy applies worldwide to all ERM entities, all Employees and all ERM Agents.

3.0 DEFINITIONS

The term "Employee" or "Employees" is specifically defined, for purposes of this policy, as: any personnel hired directly by ERM (regardless of status classification of full-time, part-time, temporary, contract, etc.); interns; employees of other companies seconded into ERM, and any ERM employee seconded to a non-ERM company.

The term "Agent" or "Agents" is specifically defined as any member of any ERM entity board, any officer of any ERM entity, hired personnel, consultants, intermediaries, lobbyists, agents, representatives, independent contractors, subcontractors, and any others who act on ERM's behalf.

The term "modern slavery" is a broad phrase used to encompass slavery, servitude, forced or compulsory labor and human trafficking. "Slavery" occurs when ownership is exercised over a person which deprives the person of his or her freedom. "Servitude" is the obligation to provide services imposed by the use of coercion, while "forced or compulsory labor" refers to any work or service that is performed involuntarily and under the menace of penalty. "Human trafficking" is the recruitment, transportation, transfer, harboring or receipt of a person by improper means (including but not limited to force, abduction, fraud or coercion) for an illegal or improper purpose, including forced labor. The above definitions are in line with the [UK Modern Slavery Act 2015](#), [International Labour Organisation \(ILO\)'s Forced Labour Convention 29](#) and the [1926 Slavery Convention](#).



Example types of modern slavery:

Debt bondage/bonded labour	The most widespread form of slavery where people are forced to work to pay off the debt. Often people are tricked into working for little or no pay, with no control over their debt and employment conditions.
Forced labour	Any work or services people are forced to do against their will under threat of punishment.
Human trafficking	Refers to the recruitment, transportation, transfer, harbouring, or receipt of persons under the use of threat and/or force or other forms of coercion with the intent of exploiting that person (e.g. for purposes such as forced prostitution, labour, criminality, marriage or organ removal).
Descent-based slavery	Most traditional form, where people are treated as property, and their "slave" status was passed down the maternal line.
Slavery of children	When a child is exploited for someone else's gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery.
Forced and/or early marriage	Any situation where persons, regardless of age, have been forced to marry without their consent and cannot leave.

The term "child labor" means hazardous labor or labor provided by a child below a basic minimum age. For the

purposes of this policy, ERM defines “basic minimum age” and “age for hazardous work” as 15 years and 18 years respectively, or the minimum age set by national law, with any conflict in application by ERM to be resolved by the higher age. Certain exceptions may exist and be permitted by ERM for supporting the goal of promoting education and work experience as part of a bona fide education program, but only in conformance with local law. The above definitions are in line with the [ILO Conventions 138 and 182](#).

4.0 COMMITMENT

ERM endorses the United Nations Guiding Principles on Business and Human Rights and supports the principles contained within the International Bill of Human Rights and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work.

ERM are signatories to the UN Global Compact and thereby commit to uphold it’s 10 principles, two of which focus on human rights. We report our performance annually via the Communication on Progress which is published on the UN Global Compact website.

We conduct human rights due diligence as part of our project selection and review process. This includes triggers within our Project Liability Analysis (PLAN) tool and our automated sanctions checks.

Modern slavery is both a crime and a violation of fundamental human rights. ERM is committed to the elimination of all forms of modern slavery and to the international effort to abolish child labor. ERM takes a zero-tolerance approach to such activities and seeks to identify and address such risks in our offices, operations and wider supply chains. ERM publishes an Annual Statement on Modern Slavery Statement that outlines our activities and performance during the year.

ERM will routinely fund, develop and require training on modern slavery as determined by ERM’s ExCom Sustainability Working Group.

ERM is committed to supporting its clients in their efforts to address modern slavery and child labor in their operations and supply chains. ERM delivers a range of services to its clients including the development of modern slavery and child labour policies, risk assessments, mitigation strategies and remediation. Examples of ERM client work in this area may be reported in the Sustainability Report or our corporate communication channels, subject to confidentiality and other considerations, as determined by ERM’s ExCom Sustainability Working Group.

5.0 EMPLOYEE RESPONSIBILITIES

- 5.1** All Employees are expected to be aware of human, rights, modern slavery and child labor risks and to remain vigilant in spotting the signs when conducting business, particularly when involving third-party business partners. Some examples include:
- Hiring a sub-contractor to support a site assessment;
 - Contracting transport or logistical services for a remote project;
 - Using a recruitment agency to hire new employees; and
 - Contracting cleaning services for ERM’s offices.
- 5.2** Employees should familiarize themselves with the [ERM Business Code of Conduct and Ethics](#) and [ERM Statement on Modern Slavery](#), which include provisions related to modern slavery and child labor.
- 5.3** If an Employee suspects a breach of this Policy they should report their concerns immediately to their line manager and Chief Compliance Officer or via the business.conduct@erm.com email notification system.
- 5.4** Any Employee who breaches this Policy or fails to report any breach they become aware of will be subject to appropriate disciplinary action up to and including dismissal.
- 5.5** Student educational work experience that has been approved by ERM in accordance with international standards and local applicable law is not considered child or forced labor.

6.0 BUSINESS PARTNER RESPONSIBILITIES

- 6.1** Business partners including sub-contractors, suppliers and recruitment agencies are required to comply with ERM’s [Supplier Code of Business Conduct and Ethics](#) and [Sustainable Procurement Policy](#), which include provisions related to human rights, modern slavery and child labor.
- 6.2** Business partners should also endeavor to cascade the provisions of the Supplier Code down their own supply chains.
- 6.3** If a business partner suspects a breach of this Policy they should report their concerns immediately to the Chief Compliance Officer.

7.0 PROCEDURE

All Employees will be registered in ERM's Human Resources Information System (HRIS) and contractors providing labor or services to ERM will be registered in ERM's Global Contractor Management System as that system is progressively rolled out globally. ERM's hiring and contractor selection protocols must be adhered to but may vary to meet local applicable law and applicable ERM global, regional, and local policies. All approval for student educational work experience must be obtained in writing from the applicable Regional Human Resources Director.

8.0 Implementation

This policy will be reviewed at least every three years. On at least a yearly basis, the ERM Global Sustainability Director will report progress under this policy to ERM's Global CEO.

ERM Global Policy Manual Administration

Policy Title: Human Rights, Modern Slavery and Child Labor

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Original Approver and Original Effective Date: Group CEO / 20 August 2021 (Approval and version history maintained by ERM Legal Department)

Policy Description: Policy to support human rights and prohibit modern slavery and child labor use or involvement by ERM, updated for the UK Modern Slavery Act 2015.

Authority to Amend this Policy: Chief Compliance Officer

Authority to Waive this Policy: None

Policy Review Cycle: 3 years from Effective Date of this version

Docket Responsibility for Review Cycle: ERM Global Sustainability Director