



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 UN Declaration of Human Rights, 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](mailto:business.conduct@erm.com) email notification system. Additionally, ERM has a 24/7 online or call-in option for any employee who wishes to report concerns anonymously. The anonymous reporting option is the ERM Helpline. The Helpline is a third party independently administered system that is a multilingual reporting system accessible to all employees.

**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

**Policy Number:** 13

**Revision Number:** 4 (Note: originally titled *Child and Forced Labor* in 2010, then revised to *Slavery, Child Labor and Human Trafficking* in 2016 and 2019 revisions prior to current title)

**Effective Date of this Version:** 23 June 2023

**Original Approval 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