



# Our approach to human rights

# Introduction

This document provides an overview of ERM’s approach to human rights, which is central to our purpose and values, a priority for management and our employees and a central tenet of our strategic approach to ESG.

We are committed to respecting the rights of all those with whom we engage through our own operations and across our value chain, this including our work with clients, [The SustainAbility Institute by ERM](#), the [ERM Foundation](#) and our engagement with wider stakeholders, in recognition of our individual and collective responsibility to respect and promote human rights in society.

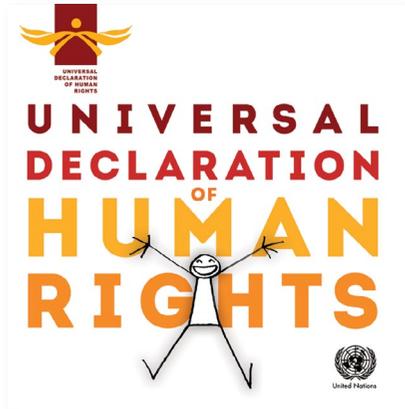


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# Our commitment



ERM endorses the Universal Declaration of Human Rights, 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 Labor Organization's Declaration on Fundamental Principles and Rights at Work.

As a signatory to the UN Global Compact, we are committed to upholding its 10 principles, two of which specifically focus on the protection of human rights. Through the UN Global Compact, we are also a signatory to the Women's Empowerment Principles.

We strongly support the implementation of the UN Sustainable Development Goals (SDGs) and understand that respecting human rights is fundamental to the contribution which companies can make to the delivery of the goals.

We are also committed to workplace equality and ERM is a signatory to the Race at Work Charter driven by Business in the Community.



Photo credit: ERM

Our **Human Rights, Modern Slavery and Child Labor Policy** outlines ERM's commitments and actions on these topics, and articulates the responsibilities for employees and our business partners in this context. 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.

Respecting human rights set out in our Human Rights, Modern Slavery and Child Labour Policy and is supported by a wider policy framework, which includes our **Business Code of Conduct, health and safety, and supplier policies**.

We are committed to open and transparent disclosure across the jurisdictions within which we operate, including through our annual Modern Slavery Statement and wider disclosures, which are subsequently detailed in this document.

# Our approach

## Our value chain

We respect and promote human rights across our value chain, which encompasses the following:

- **Our operational approach**, from our Business Code of Conduct to the training our staff undertake to staff, human rights is embedded in our operational governance.
- **Our people**, based in over 40 countries across the globe and who worked in over 172 countries during FY23, bringing their local and specialist understanding of human rights to inform our operational approach and that of clients.
- **Clients** who span across industries, including energy; chemical and pharmaceutical; finance; technology, media and telecommunications; mining and metals; manufacturing; and other important industries, which face evolving human rights issues.
- **Commercial partnerships**, which augment and increase the positive impact we can have on human rights performance through our own operations and through our work with clients.
- **Contractors and suppliers** who provide specialized expertise, from construction and heavy equipment operators to local and Indigenous natural and social scientists.
- **Our engagement with stakeholders and contribution to society.** We seek to further the human rights agenda through collaborations with leading organizations including the United Nations, the World Business Council for Sustainable Development and the Business Commission for Tackling Inequality, as well as through the work of The SustainAbility Institute at ERM and ERM Foundation.

## Material to our business

Respecting human rights has been embedded in ERM's material topics from our first materiality assessment in 2012, focusing on our most salient issues such as occupational health and safety, training and development, labor management, environmental protection and how it may impact workers and communities, and diversity, equity, inclusion and belonging. Human rights remains one of our key material issues and our approach has, and will continue, to evolve drawing upon our own in-house expertise but also working in partnership with stakeholders to build our collective understanding of how best to drive performance in this context.



Photo credit: ERM

# Our own operations



Photo credit: Indradi Soemarcijan, Singapore

## Governance

ERM's most senior governance is provided by the ERM Board and Executive Committee. The Board is the highest authority and ultimately responsible for the strategic direction, governance and oversight of The ERM International Group Limited (as parent company of the ERM "Group") on behalf of its stakeholders. The ESG Risk and Sustainability Steering Group serves as an advisory group to the ERM Board and reviews social impact and human rights lessons learned from its own operations and its work with clients, identifies external factors that might affect performance and recommends any necessary changes to the business.

ERM's Executive Committee members are responsible for the strategic and operational leadership and management of the business. The Executive Committee has accountability for managing the sustainability impacts of the organization, including human rights. Executive Committee members with accountability for human rights and other sustainability material topics have related performance criteria in their annual goals and targets, and this also extends to a range of functional and operational leaders.

The performance of our overall sustainability program is included in bonus considerations for our Global Leader of Sustainability and Risk, who also serves on ERM's Executive Committee, ESG Risk and Sustainability Steering Group and the Board. In addition, the Executive Committee leaders accountable for material topics, including human rights; diversity, equity, inclusion and belonging (DEIB) and wellbeing; health and safety; risk management; and business conduct and ethics, have specific targets and bonus considerations.

Our human rights governance and operational management is led by our sustainability and risk function, working closely with legal, procurement and finance functions, and cascaded through our business operations and across our value chain.

The Sustainability Working Group of ERM's Executive Committee provides strategic leadership on sustainability, including human rights, and reports to the full Executive Committee, then via the Group CEO to ERM's Board. Working group members include the Global Leader of Sustainability and Risk, our Chief People Officer, the Global Services' Director, the Regional CEO for Latin America and the Caribbean, and the Regional CEO for North America, with facilitation by the Global Sustainability Director.

## Embedding respect for human rights

Ethical business conduct is essential to the success and sustainability of ERM. We conduct business with uncompromising honesty and integrity, adhering to laws, regulations and our written **Code of Business Conduct and Ethics**, and expect everyone at ERM to act accordingly. We express this commitment through our business values, professional standards, employee training and our internal systems and practices.

Our Code sets out clear and unequivocal requirements on adherence to the highest standards of ethical and legal compliance, this including our commitment to combat bribery and corruption. These requirements are embedded across our key systems and programs, and fundamental to our operational approach.

For more on the location of anti-bribery and corruption-related disclosures, see our **UN Global Compact Communication of Progress**, which includes details of our reporting on Principle 10, Anti-Corruption.



Our approach to ethical business conduct includes:

- Screenings and risk analysis for clients, locations and opportunities for trade sanctions, anti-money laundering and human rights.
- Internal policies and procedures on subcontractor management. We continue to expand and improve subcontractor management in the many jurisdictions where we operate.
- Participation in building external standards and providing education so that momentum not only builds in value chain but beyond, fully aligned with our purpose of shaping a more sustainable future with the world's leading organizations.

## Identifying human rights risks and impacts

ERM integrates an array of human, operational, financial, geopolitical, legal and strategic issues into a common approach to identify, assess and manage risks. Our risk function supports our organization's ability to deliver on our goals, anticipate risks, flow risk information to decision-makers, proactively implement management strategies and improve our stakeholders' confidence and trust.

Our approach to identifying salient human rights risks and impacts enables ERM to assess risks at the local, business unit, regional and companywide levels. We consider risks associated across our operations and value chain, including our work with clients, subcontractors, suppliers and the communities, in which we operate.

We recognize the importance of reflecting the different priorities and challenges, which different regions/geographies face, but also the common driver of protecting and promoting human rights, which unites us and our stakeholders globally.

To execute our vision, deliver on our growth ambitions and meet the needs of stakeholders, our risk and sustainability programs are tied directly to each other in support of our business strategy. The top sustainability issues identified through our materiality assessment, which includes human rights, are considered alongside enterprise-level risks, which in turn inform our strategy and strategic plans. Strategic risks, including human rights-related risks are identified and assessed through our risk management processes and included in our risk register.

We work in more than 170 countries annually across six continents, including locations that present challenges due to complex economic, political, social and geographic conditions. Our risk management systems enable us to provide world-class services to our clients without compromising the health, safety and integrity of our people.



Photo credit: ERM

We have introduced a risk-based project screening requirement to help us identify more systematically the potential adverse human rights impacts of our work with clients, enabling us to take the appropriate measures to avoid causing, contributing or being linked to such impacts.

We take care in forming business relationships so that we honor our standards of business conduct and ethics. We are required by various laws and regulations to undertake certain due diligence in relation to clients, subcontractors or other third parties, and comply with applicable trade sanctions and anti-money laundering laws. To do this, ERM conducts a due diligence screening process to check our clients, contractors and other business relationships. ERM's system for this compliance is integrated within our customer management system.

We consider geopolitical risk within the context of our business strategy and risk management program, and we consider the implications within our own operations as well as our work at the sector, client and project levels.



## Enterprise risk management

ERM's enterprise risk management system is overseen by our Head of Global Risk and is subject to ongoing review and development. Most recently, the system has evolved to align more fully with the Committee of Sponsoring Organizations of the Treadway Commission (COSO) framework, which addresses control environment, risk assessment, information and communication, monitoring and existing control activities. This includes the integration of material human rights issues into our risk management and our strategy.

Opportunities are automatically screened for potential ESG risks, including human rights, biodiversity and climate impact. Our sustainably transparent assessment of risk and reward (STARR) process is a first step prior to evaluating opportunities that have been triggered and all opportunities for new clients.

At the earliest possible time, an assessment of clients and opportunities is required to help make the right decision that is aligned with our strategy, purpose and beliefs. Based on an assessment of available information and discussions with relevant stakeholders and decision-makers, as facilitated by the Regional Risk Director, a preliminary “go/no go” decision will be made. For opportunities that receive preliminary approval to advance, commercial and project evaluation and a project risk review process continues throughout the project.

Once the STARR process is complete, ERM's operational risk processes provide a globally consistent approach to managing our project risks that enables us to identify and mitigate the risks before project commencement or at significant change-in-scope events.

ERM has in place a Global Project Risk Review Policy to strengthen project risk management throughout the life cycle of significant projects. This policy applies where a project has a material impact on the business, or project risks are material to the business, or a project failure could have a material impact on the business. The process involves senior experienced business leaders and technical specialists supporting the project team throughout the project.

ERM is also further developing our human rights due diligence as part of our risk management approach, once projects are operational, to assess whether any of our own employees, subcontractors or external stakeholders would be at risk for infringement of their human rights.

If there is any potential for human rights issues, this would be discussed with the client and other relevant stakeholders. Should the project proceed, mitigation measures would be implemented with input from relevant human rights experts and senior leaders and monitored on an ongoing basis. If the human rights concerns cannot be mitigated, then ERM would not proceed with the project or activity.

## Tracking and monitoring

We continue to learn more about human rights-related risks based on direct feedback from our delivery teams, and we continue to incorporate this learning into the corresponding risk tools.

During FY24, we are evaluating options to improve how we track and evaluate the effectiveness of our responses to actual and potential human rights impacts, including feedback from internal and external stakeholders. We are committed to implementing effective monitoring and are continuing to work with clients, our supply chain and across our operations to develop our monitoring framework.

We are identifying opportunities to better track and monitor human rights performance across our global operations. In addition to evolving the governance of our value chain, we are also committed to monitoring performance and will engage to understand how best this can be achieved, building upon our processes to-date.

## Grievance mechanisms and remedying adverse impacts

We have established grievance mechanisms in place for employees, suppliers and subcontractors, clients and the public, and publish information on how to access our grievance mechanisms through our [Human Rights, Modern Slavery and Child Labor Policy and Modern Slavery Statement](#) on [erm.com](http://erm.com)

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 with over 30 different language options, accessible to all employees. Additionally, we have internal resources directly available.

Clients can report concerns through ERM's client feedback program. The approach uses a global project and client management tool, based on the Salesforce platform, to document, internally publicize and respond to client feedback. Every project has an identified Account Director/Manager and Partner in Charge who are directly accountable and fully responsible for ensuring client feedback is received and actioned.

A range of stakeholders – including Account Directors, Industry Leaders, Service Leaders and Operational Leaders – are engaged in the feedback approach to share insights, provide support and respond to client needs. Where warranted, client concerns are elevated within the organization to assess whether changes are needed within our quality management system, governing procedures or training requirements.

Members of our account teams, service leaders and technical communities engage with our clients on how to generate greater impact and how we can make an even greater contribution to addressing their key business and societal issues.

Members of the public (individuals and communities) can communicate concerns or ask questions by emailing [sustainability@erm.com](mailto:sustainability@erm.com).

We have a clear process for the cessation of project activities where concerns are raised and investigating incompatibility with our policies or Code of Conduct. Continued development of grievance mechanisms for external stakeholders will remain a priority focus for FY24.

## Supply chain

We have developed specific global requirements for suppliers and subcontractors as part of our supply chain process, with explicit requirements in relation to modern slavery concerns. This is part of our wider human rights due diligence process.

ERM works with suppliers and subcontractors that demonstrate the following attributes:

- Incorporate safe practices in all commercial decisions;
- Exhibit a high level of integrity at all times and in all dealings;
- Commit to enhancing human rights and wider sustainability performance;
- Demonstrate outstanding quality of work; and
- Provide cost savings innovation.

ERM's process for engaging subcontractors includes the use of a third-party supply-chain risk management solution to pre-screen our subcontractors. Combined with our own Active Leadership Audit Program audits and subcontractor qualification assessments, ERM regularly collects and evaluates data on our use of subcontractors.

Our Supplier Code of Business Conduct and Ethics supplements our supply chain management system. Specifically, the supplier code consolidates updates on key international terms such as anti-bribery and corruption, human rights (including prohibitions for all forms of modern slavery) and our health and safety contractual requirements. Our standard form subcontractor agreements and supplier-relationship management system requirements were all updated with the supplier code as part of its implementation. Learn more about [ERM's global requirements for suppliers and subcontractors](#).

In line with our commitment to implementing sustainable practices across our business operations and supply chain, ERM also requests suppliers to adhere to our Sustainable Procurement Policy and provide ESG-related data. Supplier ESG performance management will continue to be a focus for development throughout the coming year.

Our supply chain is required to adhere to our Supplier Code of Business Conduct and Ethics, our Sustainable Procurement Policy and our **Human Rights, Modern Slavery and Child Labor Policy**. Going forward, we will engage to identify opportunities to further increase awareness and build capacity in our supply chain, consistent with our own internal operational approach.

ERM has established internal procedures for vetting third parties to help ensure that our business partners are not engaged in suspected practices relating to human trafficking. This year, we implemented mandatory training for those in a project or operational managerial capacity, to strengthen their awareness of the issue, and how to take action if they have concerns with any of our business partner activities.

We review our supplier's hiring practices, from asking how they recruit employees to requesting records that verify they follow anti-trafficking efforts. This can include thorough background checks and efforts to confirm submitted documents. A high degree of due diligence is conducted when engaging labor brokers, especially in high-risk jurisdictions.

In accordance with our Sustainable Procurement Policy, we encourage companies in our supply chain to promote transparency in their own supply chains. ERM will work with our supply chain to develop effective monitoring processes to stay alert to forced labor and other human trafficking risks. We commit to performing regular engagement with businesses along our supply chain to determine if their practices remain aligned to ERM's ethical standards and goals.

## Training

We place a significant focus on ethical and responsible decision-making, from the Board to our Partners and all employees. Our training, systems and procedures provide the guardrails for making ethical decisions in every facet of work at ERM.

The delivery of our human rights approach is the individual and collective responsibility of all ERM employees, and we promote active awareness of, and response to, any potential human rights issues or violations.

This year, we refreshed our modern slavery and human trafficking training, which is mandatory for all manager level and above roles. We will extend this to all employees in the coming year.

On a global basis, ERM also now requires all new employees to undertake mandatory training on modern slavery and human trafficking, along with a wider suite of training, examples of which are subsequently outlined. We also require existing employees to undertake refresher training.

### Examples include:

- ERM Code of Business Conduct and Ethics (which includes confidential information and computer security, conflicts of interest, promoting diversity and inclusion, reporting and nonretaliation, and electronic communications);
- Anti-bribery and corruption;
- Human trafficking;
- Key health and safety policies and processes;
- Data protection and privacy;
- Preventing workplace harassment; and
- Building an inclusive culture.

We assign additional training to meet ERM's regulatory, safety and compliance requirements based on each employee's role or the location, in which they are working, or in response to individual client or project need. This can include:

- International contracting: money laundering and trade sanctions;
- See Own Share: Beyond Hazard Recognition.

**In FY23, 96% of new hires completed their training on time and 92% of existing employees completed the refresher training.** We will continue to focus on ensuring employees complete training in the required timeframes.

All finance and legal personnel are required to complete training in trade sanctions and anti-money laundering, for both new and existing employees.

Every supervisor is required to complete an annual self-certification on compliance with our global policies regarding conflict of interest, manager duty and antibribery and corruption policies. We recognize that our continued success depends on our ability to maintain a culture of integrity, which is why we are committed to the highest standards of ethical conduct and comply with both the letter and spirit of the law everywhere.

# Our work with clients

Our most significant impact as a company is through our work with clients, whom we support to embed and improve their human rights policies and practices. Drawing upon leading expertise and knowledge of local contexts across the globe, our social and human rights consulting services teams help companies in various industry sectors, at the corporate and asset levels, to conduct human rights due diligence and manage social impacts. We work on a wide range of issues including community participation, impacts and access to remedy; indigenous peoples rights; supply-chain due diligence; diversity, equity, inclusion and belonging; and just transition.

We have risk management processes in place to help us identify whether any of our engagements with clients, whether on environment, climate or social impact could potentially be linked to adverse human rights impacts. Further information on this is set out later in this document. We understand that our clients may be at different maturity levels embedding human rights in their management systems and are ready to encourage alignment with key international frameworks.

## Securing social license & building social capital for clients

### Social impact & performance

- Conduct participatory baseline and impact assessments for successful permitting and expansions
- Formulate corporate and asset-level social impact strategies, identify goals and metrics, report and communicate to stakeholders
- Update and roll out social performance policies and standards following international frameworks
- Design and implement social systems and create dashboards

### Human rights

- Conduct gap assessments against emergent and established regulations across jurisdictions
- Conduct salient and detailed human rights impact and risk assessments, identify human rights risks related to climate
- Update human rights policies, train leadership and staff
- Identify and address supply-chain impacts and risks
- Set up and upgrade grievance mechanisms
- Report on human rights and modern slavery due diligence
- Improve human rights rankings and ratings

### Stakeholder engagement & trusted communications

- Identify and map stakeholders, including local communities, public officials, development partners and NGOs
- Develop and implement meaningful stakeholder engagement and trusted communication approaches
- Set up and facilitate community advisory panels
- Design websites and digital media campaigns

### Diversity, equity, inclusion & belonging

- Set targets and programs on DEIB
- Consult, engage and involve employees
- Report on DEIB
- Understand and address energy and digital transition risks and opportunities for your workforce

### Cultural heritage & archaeology

- Generate cultural heritage baseline mapping
- Identify, evaluate and mitigate cultural resources
- Develop plans for historic preservation and unanticipated discovery
- Conduct interpretive programming, public outreach and education
- Support compliance reporting
- Design research for data recovery and investigations
- Conduct architectural inventories and assessments
- Analyze artifacts

### Transformation

- Translate the stewardship of social outcomes into leadership language, business processes and workforce behaviors
- Accelerate growth of brand and asset value by elevating social trust and human capital through stories and campaigns

### Political risk advisory

- Monitor geopolitical and societal risks and opportunities based on human intelligence gathering
- Conduct political and reputational due diligence, supply chain risk analysis for mergers and acquisitions
- Support innovative solutions to complex political and social contexts
- Develop best practice government relations governance structures, tools and processes, aligned with social, legal and permitting needs

### Just transition

- Support the development and implementation of project and portfolio transition strategies
- Develop and implement stakeholder engagement to inform transition planning
- Develop social investment, training and upskilling programmes to support transition of employees and wider communities

The consideration of human rights is also integral to our climate and wider environmental advisory services, further detail on which is available at [www.erm.com/service](http://www.erm.com/service)

In addition, ERM has developed proprietary tools to support clients' development and improvement of human rights-related management systems as well as their performance.

These include:

- Human Rights Impact Assessment standard;
- Human Rights Country and Industry Risk Tool; and
- Assessment assurance methodology for assets.



Photo credit: ERM

# Our engagement with stakeholders & contribution to society

We are committed to engaging and collaborating with our stakeholders to promote the human rights agenda, these including: our employees, clients, investors, lenders, suppliers and subcontractors, strategic partnerships, local communities, governments, nongovernmental organizations (NGOs), business and industry associations, and academics and other thought leaders.

## Advocacy

ERM actively supports a range of leading organizations working to promote the human rights agenda including, the Working Group on Modern Slavery facilitated by the United Kingdom's chapter of the UN Global Compact, the World Business Council for Sustainable Development (WBCSD) activities related to human rights and our Global Services lead for Social Performance, serves as a commissioner in the Business Commission for Tackling Inequality.

## ERM partners with multistakeholder organizations addressing human rights issues

### **Business Commission to Tackle Inequality**

**(BCTI)** is a cross-sector, multistakeholder coalition of nearly 60 organizations and their leaders launched in July 2021 with the mission of mobilizing the private sector to tackle inequality. ERM's Global Leader on Social Performance & Human Rights serves as a Commissioner to BCTI.

**The Campbell Institute** is the environmental, health, safety and sustainability center of excellence of the US National Safety Council. ERM has been a member of the Campbell Institute since June 2017 and actively participates in Campbell Institute committees, working groups and meetings.

**Capitals Coalition** develops, advocates for and advances the capitals approach, which integrates measurement and valuation of natural, social, human and produced capital. ERM sits on the Advisory Board of the Coalition and contributes to technical and strategic support on topics such as the living wage and valuation of occupational health and safety. We have also collaborated on research and publications including the Social and



Human Capital Protocol – a Primer for Business. Doug MacNair, Technical Director, serves as a Commissioner on the Value Commission.

### **The World Business Council for Sustainable Development (WBCSD)**

is a global, CEO-led organization of over 200 leading businesses working together to accelerate the transition to a sustainable world. ERM has been actively involved in WBCSD since we joined as a founding member in 1995 through secondments, the involvement of the SustainAbility Institute by ERM and engagement of our Group CEO and other senior leaders.

### **ERM also works with numerous wider organisations dedicated to addressing climate and nature-related challenges, including:**

The Climate Pledge, Ceres, Circular Electronics Partnership, Natural Climate Solutions Alliance, Principles for Responsible Investment, Race to Zero, The Science Based Targets initiative, Task Force on Climate-related Financial Disclosures, Taskforce for Nature-related Financial Disclosures, World Business Council for Sustainable Development and World Environment Center (WEC).

Our work with organizations and clients has helped push for public policy that drives the sustainability agenda, including human rights. We have a long and successful track record of providing advisory services to companies and other clients on public policy and advocacy strategies.

For nearly three decades, we have brought together companies and other stakeholders with similar interests to advance common goals in sustainability-related policy, such as developing strategies to promote policies that support human rights.

We will continue to explore further opportunities for human rights advocacy through our work with clients and partner organizations.



## Thought leadership

Beyond our advisory services to clients and collaboration with organizations such as the Business Commission for Tackling Inequality, ERM contributes to thought leadership on human rights through The SustainAbility Institute by ERM. The Institute provides a platform for our in-house technical experts and through collaborations with clients, to discuss key topics in the human rights and broader sustainability agenda.

## The ERM Foundation

The ERM Foundation is an employee-led foundation that works in partnership with smaller nonprofit organizations and social enterprises. It seeks to create a lasting impact at the intersection of biodiversity protection, climate action, women’s livelihoods and improving access to clean water and sanitation. The protection and promotion of human rights is at the core of the ERM Foundation, both through the nature of the work, which is funded and impact generated but also with respect to the standards and ethical practice required from the organizations with whom we partner.

Key aspects of the Foundation’s work, which contribute to the promotion of human rights, are the focus areas of “investing in women’s livelihoods in the low carbon economy” and providing access to menstrual health and hygiene education, through “improving access to clean water and sanitation”. Partnerships with the organizations such as Africa Development Promise, Swadhina in India and Palesa Pads in South Africa, to provide education, training and access to opportunities for females who may otherwise be overlooked or denied such opportunities and/or face discrimination or marginalization.

Further information on the work of the [ERM Foundation](#)

# Communicating openly & transparently

Over the past year, we have seen increased attention on human rights in the requests for sustainability and ESG-related information from investors, lenders, clients, acquired companies, business partners, employees and membership organizations. These requests are growing in volume and complexity, and increasingly extend beyond our core business activities to encompass our value chain.

We are committed to communicating openly and reporting publicly on human rights. This document forms part of our evolving commitment to transparent and accessible reporting on our approach and performance, for the benefit of all our stakeholders. Our reporting includes:

- Annual disclosure of our sustainability performance, including human rights, in our **Sustainability Report**, which is prepared according to the Global Reporting Initiative (GRI) Standards. We were among the first companies to report in accordance with the GRI Standards. Our GRI-driven materiality assessment process enables us to identify, prioritize and validate human rights as one of our companywide material topics. We are proud to be a GRI Community member.
- Our performance in upholding the 10 principles of the UN Global Compact and the Women's Empowerment Principles annually via the **Communication on Progress**, which is published on the UN Global Compact website.
- Our annual **UK Modern Slavery Statement** that outlines our activities and performance during the year. Our statement reflects our commitment to international efforts to abolish all forms of modern slavery and sets out the measures to ensure there is no slavery and human trafficking in our business operations and supply chain.
- **Supporting the SDGs**, a supplemental document that provides a snapshot of ERM's contributions to the United Nations Sustainable Development Goals (SDGs). Human rights are essential to achieving the SDGs.

# Looking ahead

As societal understanding evolves, so to does our approach to human rights.

We are committed to ongoing development and in FY24 we are prioritizing the following actions with respect to human rights:

- Evaluating options to improve how we track and evaluate the effectiveness of our responses to actual and potential human rights impacts, including feedback from internal and external stakeholders.
- Engaging with our supply chain to identify opportunities to further increase awareness and build capacity in our supply chain, consistent with our own internal operational approach.
- Publishing our ERM Human Rights Strategy document, which will be made available online.
- Continuing development of grievance mechanisms for external stakeholders.

We will report on our progress on [erm.com](https://erm.com)



Photo credit: Edward Huang, Taiwan



# Our Approach to Human Rights



Photo credit:  
Gonzalo Sanson  
Image of local fisherman, taken  
during field reconnaissance  
of environmental and social  
impacts in Peru

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The business of sustainability