

ERM Modern Slavery Statement 2018

Note: This Statement is made pursuant to section 54(i) of the UK Modern Slavery Act 2015 and constitutes the Modern Slavery Statement 2018 for ERM Worldwide Group Ltd and its global subsidiaries.



This Statement is ERM's third Modern Slavery Statement and should be read in conjunction with our [previous Statements](#) and our [Slavery, Child Labour and Human Trafficking Policy](#). ERM continues to be a strong supporter of ethical business conduct in our operations and supply chains and the international effort to abolish all forms of modern slavery. Below we describe the specific actions we have taken in the past fiscal year and note our next steps on this topic planned for the fiscal year ending 31 March 2019.

1.0 Summary of Actions taken during fiscal year ending 31 March, 2018

In the fiscal year ending 31 March 2018, the specific actions taken to progress our efforts are as follows:

- We made the decision to implement a global anonymous reporting system so that concerns about our business operations, including modern slavery and any other form of unethical business conduct, can be reported to us without fear of retaliation;
- We established a supplier/subcontractor task force to perform an in-depth analysis of ERM's operations with the purpose of developing improved policies, procedures, and systems related to our own supply chain;
- We began development of a mandatory online training module for our employees regarding modern slavery, with the aim to rollout a training pertinent to our specific industry and operations in the next fiscal year; and,
- In addition to our work for clients on modern slavery matters, ERM participated in a number of external engagements related to modern slavery in the last year. Examples include: participation in the Working Group on Modern Slavery facilitated by the UK chapter of the United Nations Global Compact and active engagement with the World Business Council on Sustainable Development (WBCSD) on Human Rights.
- Commenced development of a separate and specific Supplier Code of Business Conduct & Ethics to be used as part of our supply chain process (with explicit requirements, in relation to modern slavery concerns ("Supplier Code").

2.0 Our Business

ERM is a leading global provider of sustainability consultancy services, including environmental, health, safety, risk, social and human rights consulting services. As a professional services firm that has operated for almost half a century, our people are our greatest

asset. We have more than 160 offices in over 40 countries and territories.

The Board of Directors and Executive Committee are ERM's highest governing bodies. Our operational and governance structure is further detailed on [erm.com](#) in the section [about us/who we are](#) and in our [ERM Sustainability Report 2018](#). While our business is structured on a corporate model and is not a partnership in the legal sense, we use the term "Partner" to designate our top executives and leaders. ERM is led by approximately 550 Partners and at any given time, we have between 4,500 to 5,000 people working on projects for clients around the world.

We provide both office-based services and on-site work all over the world. Our work takes us to manufacturing plants, construction sites, mine sites, offshore and onshore rigs, agricultural and rural areas.

We provide services to clients in many countries and in all types of industries, with a focus on the following key sectors: Oil and Gas, Mining, Power, Manufacturing, Technology, Media and Telecommunications, Chemical and Pharmaceutical, and Banking and Finance.

As part of our work, we also act as advisors to multi-national corporations on human rights, UN Global Compact initiatives, OECD standards, and the Sustainable Development Goals (SDGs). ERM has seen a significant increase in the work we do with our clients to help them understand where risks of human rights abuses may appear in their operations or supply chains, how they can improve their performance to avoid these risks from occurring, and/or how they might remedy any cases if discovered.

3.0 Our Supply Chain

Our supply chains include various forms of capital (human, financial and physical), and goods and services. As a professional services firm, our people (human capital) are our greatest asset. Financial capital enables us to grow our business, while physical capital includes our 160 offices and site-based facilities. We require goods and services for our global offices and to support our delivery of projects to clients, including travel management, technical and personal protection equipment, office and IT equipment, facilities and maintenance providers as well as specialist support from subcontractors.

We acknowledge the challenges of respecting human rights throughout our supply chain and are committed to working with our suppliers and business partners to adopt and follow principles and standards similar to ERM's.

Because ERM is a services company and not a products company, we have decided to focus our modern slavery efforts on subcontracted services as they are our primary supply chain. As noted previously, supply chain management of our subcontractors continues to be a key focus for us and in the past fiscal year a task

4.0 Our Policies

Our [Slavery, Child Labour and Human Trafficking Policy](#) is in line with the terminology of the Modern Slavery Act. Accordingly, our policy prohibits the use of child or forced labour in our business and any involvement by ERM with organisations that support prohibited labour practices or human trafficking. This policy works in conjunction with ERM's [Vision and Values](#) and [Code of Business Conduct and Ethics](#).

ERM's [Sustainability Policy](#) and [Sustainability Approach](#) articulate our commitments to sustainability, and ERM became a signatory of the UN Global Compact in 2011. As part of our ongoing support for the protection of international human rights, we have continued to use our UN commitment and other international developments as a basis to improve our policies, procedures, and approach to business. Our policy framework and corporate governance disclosures are mapped in [ERM's 2018 Sustainability Report](#) to the Global Reporting Initiative (GRI) Index and also to the Ten Principles of the UN Global Compact, which include points on anti-corruption and human rights, along with further details of operational and governance structure.

Our Partners use our vision, values, policies, and internal governance arrangements to lead an ERM culture based on sustainability principles, including fair labour and human rights. Our ability to attract, develop, reward and retain talented employees is central to our business strategy and vital to our future. As part of ERM's new corporate Strategy, which we started rolling out in May 2016, we updated our values to include 'caring for our people' to underline the absolute priority that we have always maintained for the safety and health of our employees, as well as our strong focus on the growth and development of our employees. ERM strives to provide a work environment where all employees have an equal opportunity to reach their full potential and contribute to our success.

5.0 Our Next Steps for the fiscal year ending 31 March 2019

We have already accomplished certain of our goals for the new fiscal year relating to modern slavery. In August 2018, we introduced our mandatory modern slavery online learning module to all employees and we also rolled out our global reporting line. Both of these achievements will be fully discussed in next year's statement. For the remainder of this fiscal year, we will:

- Complete and issue the Supplier Code of Business Conduct and Ethics to be used as part of our supply chain process, and introduce it into operations;
- Revise our internal policies and procedures on subcontractor management in line with the Supplier Code, and introduce our new policies and procedures.
- Continue to do geographic corruption risk assessments focused on high risk areas, and encompassing modern slavery risk;

- Continue to expand and improve subcontractor management in the many jurisdictions where we have offices; and
- Work with clients and maintain active involvement in industry forums and working groups to promote the elimination of slavery around the world.

We will provide details on progress made and our performance in next year's Statement.

We reaffirm and recommit to our goal as stated last year: ERM is committed to the goal of respect for human rights and a world free of slavery, and in furtherance of this goal, we will make efforts that extend beyond our own immediate organizational interests. Not only will we continue to set internal goals, we will also participate in building external standards and providing education so that momentum not only builds in our sphere of business influence but beyond, fully aligned with our purpose of shaping a more sustainable future with the world's leading organisations.

Signed on behalf of the Board of Directors and Executive Committee:

Keryn James

Group Chief Executive

Signed: November 2018 for the financial year 2018 (1 April 2017 to 31 March 2018) for ERM Worldwide Group Ltd and its global subsidiaries