

ERM Global Policy

Slavery, Child Labor and Human Trafficking



1.0 PURPOSE

The purpose of this policy is to support international efforts against slavery, child labor and human trafficking in conformance with the ERM Code of Business Conduct and Ethics, the UK Modern Slavery Act of 2015, and other applicable international 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 (even if an intern does not receive payment by ERM); 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 “slavery” includes all of the following: definitions provided in the UK Modern Slavery Act of 2015; definitions of “slavery” or “forced labor” used in federal or state law in the United States of America; any coerced or compulsory labor, servitude; indentured servitude; detained servitude; sexual exploitation; removal of organs; or securing labor or services by force, threat, or deception.

The term “child labor” means hazardous labor or labor provided by a child below a basic minimum age. Further, for the purposes of this definition, ERM accepts the definitions of “basic minimum age” and “hazardous work” as defined by the International Labour Organization Conventions, including but not limited to Convention Nos. 138 and 182. The following minimum age rules apply, with any conflict in application by ERM to be resolved by the

higher age: minimum age specified in local law, 15 years, and 18 years for hazardous work., 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 term “human trafficking” is the recruitment, transportation, transfer, harboring or receipt of persons by improper means (including but not limited to by force, abduction, fraud or coercion) for an illegal or improper purpose, including forced labor or sexual exploitation. Further, the definition of human trafficking includes transportation of humans in violation of applicable international laws and applicable country requirements, and includes human smuggling, regardless if the person transported gave consent at any point in time.

4.0 POLICY

Modern slavery is a crime and a violation of fundamental human rights. ERM is committed to the elimination of all forms of slavery and to the international effort to abolish child labor and human trafficking and has a zero-tolerance approach to such activities..

- 4.1 No Employee of ERM may hire child or forced labor or conduct or support human trafficking on behalf of ERM.
- 4.2 All Employees should be alert to any evidence of slavery, child labor or human trafficking in operations linked to our businesses. If an Employee suspects slavery, child labor or human trafficking, report your concerns immediately to your manager and to the Chief Compliance Officer or via the businessconduct@erm.com email notification system.
- 4.3 On at least a yearly basis, the ERM Global Sustainability Program Director will report to ERM’s Global CEO progress under this policy as well as provide recommendations on education of ERM staff and public reporting of ERM’s progress under this Policy.
- 4.4 ERM expects and requires its Agents to follow the same zero-tolerance approach and will take steps to identify sources of slavery, child labor and human trafficking in our supply chain. Once identified, ERM will take steps to

eliminate those relationships or activities from our business arrangements.

- 4.5** 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.
- 4.6** 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.

5.0 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.

ERM Global Policy Manual Administration

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Policy Description: Policy to prohibit slavery, child labor and human trafficking 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 Program Director