



# Modern Slavery Statement 2024



We are committed to proactively and systematically addressing the risk of modern slavery in our own operations and across our value chain, in recognition of our individual and collective responsibility to respect and promote human rights in society, consistent with the UN Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, International Labor Organization Principles and Fundamental Rights at Work and UN Sustainable Development Goals.

**Tom Reichert, ERM Group CEO**

This document comprises the Modern Slavery Statement 2024 for The ERM International Group and all of its global subsidiaries including those encompassing operations in Canada and Australia. The complete list of ERM subsidiaries, which includes ERM Worldwide Group Limited, Environmental Resources Management Limited and ERM-Europe Limited, as of 31 March 2024, can be found on [erm.com](http://erm.com).

This Statement is published pursuant to section 54(i) of the UK Modern Slavery Act 2015 and section 14 of the Australian Modern Slavery Act 2018 (Joint Modern Slavery Statements). ERM does not currently meet the definition of a reporting entity under the terms of section 11 of the Fighting Against Forced Labor and Child Labor in Supply Chain (Canadian Modern Slavery Act) 2023 but is voluntarily reporting consistent with the provisions of the Act.

This Statement describes the specific action undertaken in the fiscal year ending 31 March 2024 (FY24) and notes plans for the next fiscal year (FY25). This Statement should be read in conjunction with our previous Modern Slavery Statements, our Human Rights, Modern Slavery and Child Labor Policy and wider corporate policies available to view at [erm.com](http://erm.com).

Signed on behalf of the Board of Directors and Executive Committee

**Tom Reichert**  
 Group CEO  
 The ERM International Group Ltd  
 Company registration no.: 13391605

# Recognizing the diverse forms of modern slavery

It is estimated that over 50 million people\* are subjected to modern slavery, and recent years have seen a sustained increase in those affected. Modern slavery exists across all parts of the world and in many forms, not all of which are easy to recognize but are nonetheless important to mitigate against.

ERM recognizes that it is our responsibility to respect the human rights of our employees and stakeholders and to support the eradication of modern slavery in all its forms. We support and align our work to the UN SDG Goal 8.7, which seeks to eradicate modern slavery amongst children by 2025 and universally by 2030\*\*.

## Forms of modern slavery

Trafficking of people for sexual and economic exploitation including children	Forced labor
Bonded labor including debt bondage	Child labor
Domestic servitude	Forced marriage

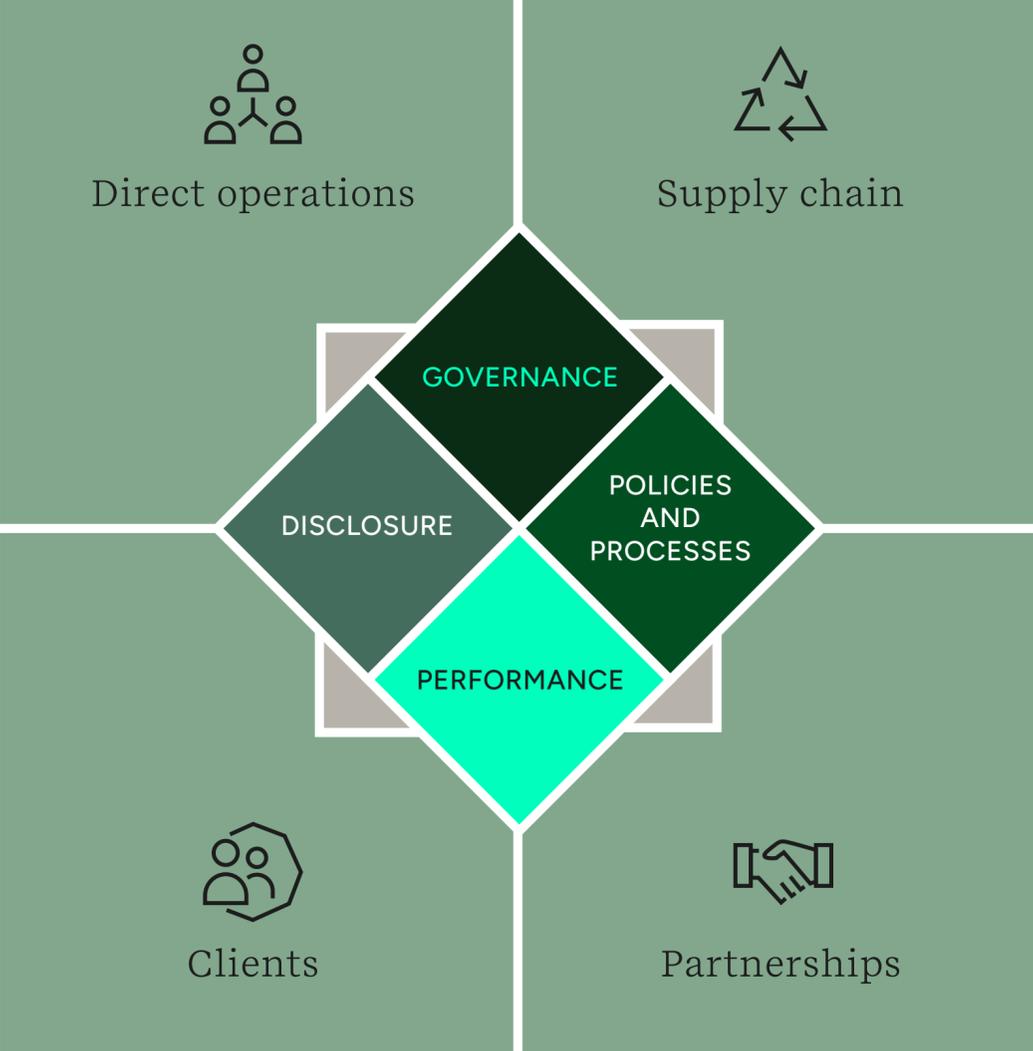
\*Global Estimates of Modern Slavery, Forced Labor and Forced Marriage, Report by International Labor Organization (ILO), Walk Free, and International Organization for Migration (IOM) 2022  
 \*\*Goal 8 | Department of Economic and Social Affairs (un.org)

**Value chain approach**

ERM is the world’s largest specialist sustainability consultancy. We operate as a services company, delivering strategic advice and technical expertise to clients across the globe.

We adopt a value chain approach to management of modern slavery risk, recognizing the potential for modern slavery risk in our direct operations and that of our supply chain but also the opportunities to work collaboratively with our clients and organizations such as the UN Global Compact to address modern slavery in all its forms.

Upstream our value chain includes employees, partners and investors who are shareholders in the business, our offices and the materials required to support them, and the services provided by the diverse suppliers and contractors who comprise our supply chain. Downstream, are our clients, the communities they operate in and their own supply chains, alongside partner organizations, global society and environment. Across our value chain, we seek to work with organizations who share our purpose and values.



**Our structure, activities and supply chain**

**Our structure**

We operate as a services company, delivering strategic advice and technical expertise to clients across the globe. Our organizational structure is built around our Partnership model, where ERM Partners are the shareholding managers and leaders of the firm.

The ERM Board of Directors is responsible for the direction and oversight of The ERM International Group Limited (as parent company of the ERM Group) on behalf of its shareholders.

This statement encompasses the Group and all its subsidiaries globally. All subsidiary companies either carry out the principal activities of the Group, namely the provision of environmental, health, safety, risk, social, and sustainability consulting services, or are holding companies.

ERM has more than 140 offices in over 40 countries and territories and employs 8,000 people globally.

**Our activities**

We operate primarily from our offices of which we have 149, located in over 40 countries and territories. We, however, also work from client offices and assets and also conduct in-field or survey activity to support out services to client.

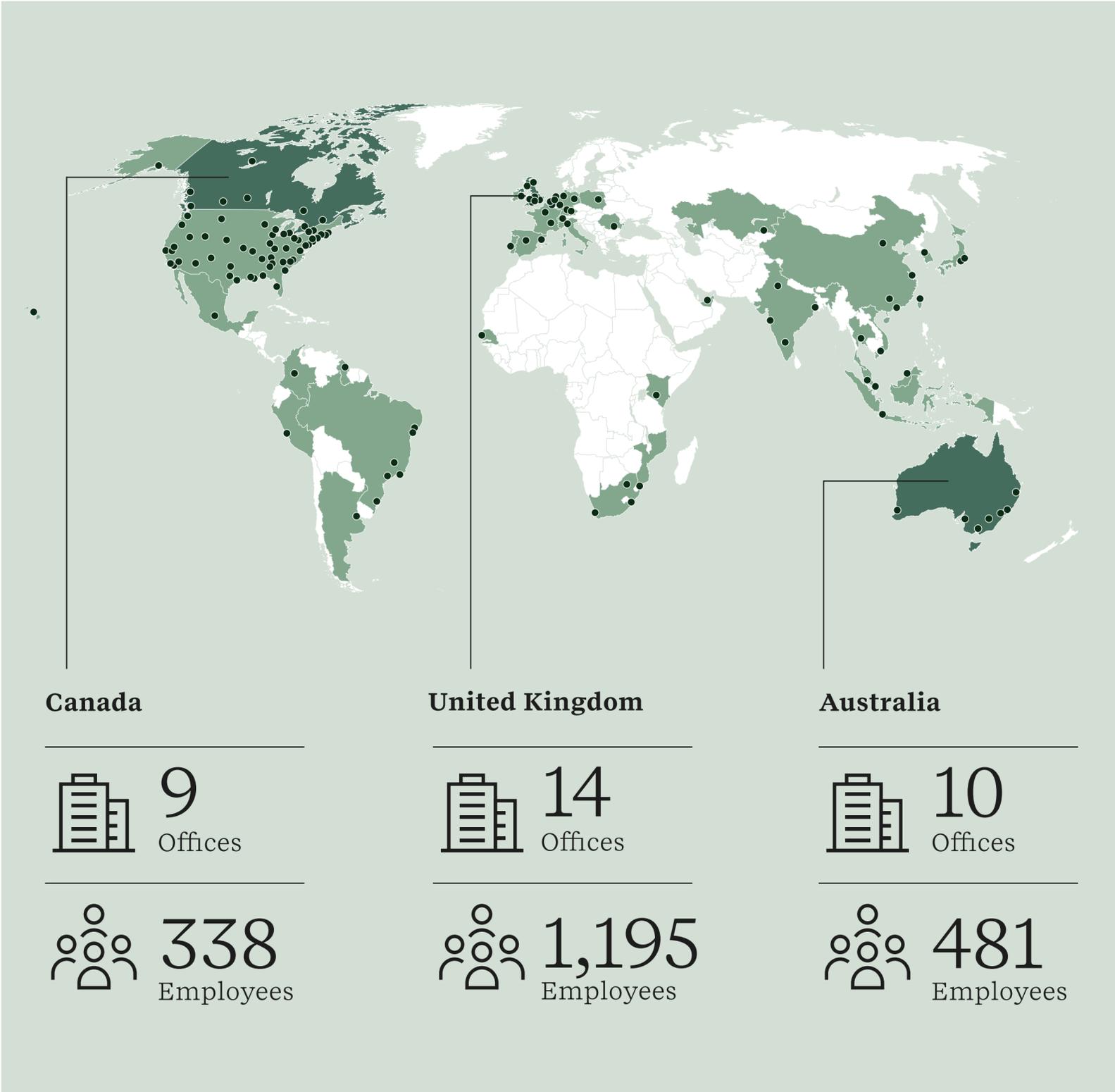
Our operational presence in respect of the UK, Canada and Australia is highlighted on the right but consistent with our approach to managing modern slavery risks, this statement addresses the breadth of our operations globally.

**Services and sectors**

Our diverse global team of experts works with the world’s leading organizations to help them set clear sustainability targets, measure progress and operationalize strategy through deep implementation and business transformation. We offer services to support clients across their operational needs, for further information please refer to [ERM's services](#).

**Our supply chain**

The nature of ERM’s business as a services company means that we subcontract services to support the delivery of our work. Our supply chain is diverse, spanning the breadth of our global offices and countries within which we deliver our services. This is an area where the potential for modern slavery exists beyond our direct operational control but we have the potential to influence. Our focus in FY24 and continuing in FY25 is, therefore, on identifying the opportunities to further strengthen our visibility, management and remediation of modern slavery risk in our supply chain. More detailed information is available in the ERM Sustainable Supply Chain Strategy.



A full list of The ERM International Group Limited’s subsidiaries can be accessed at: [erm.com](http://erm.com)

# Our assessment of material risks of modern slavery across our value chain

We adopt a value chain approach to the assessment of material risks of modern slavery. We will continue to evolve our assessment of key areas where the potential for modern slavery exists, including through targeted human rights due diligence assessments and the effectiveness of our approach to managing these risks.

## People and offices

Our employees and those with whom they work to deliver our client services, are at risk of modern slavery. Risk of modern slavery also exists within our own operations, with respect to the offices we operate from. This risk emanates from the management firms and owners of the buildings within which we lease offices and from those whom these companies employ in office service roles such as facilities management and security side. Outside of our offices, employees may conduct in-field or survey activities in locations across the world. The potential exists for our employees and contractors to encounter persons who may be at risk of modern slavery or activities which suggest that modern slavery is occurring.

## Services

Whilst we deliver specialist advice to clients on human rights and modern slavery risk management, we also deliver thousands of wider projects to clients and need to proactively identify where the risk of modern slavery may arise in respect of the delivery of these. During the delivery of those projects, it is also possible for our employees to consider some of the operational practices or employees whom they encounter, as being at risk of modern slavery. This may be a particular risk when working in client offices or wider assets, including conducting services such as audits on behalf of clients.

## Supply chain

The potential exists for modern slavery in the companies whom we contract to support delivery of our client work and with those whom our contractors may sub-contract to themselves i.e. their own supply chain. This risk may be heightened in certain geographies or in the delivery of certain services.

## Partnerships and collaborations

The risk of modern slavery exists within the organizations whom we partner with, commercially, strategically and through the work of the ERM Foundation.

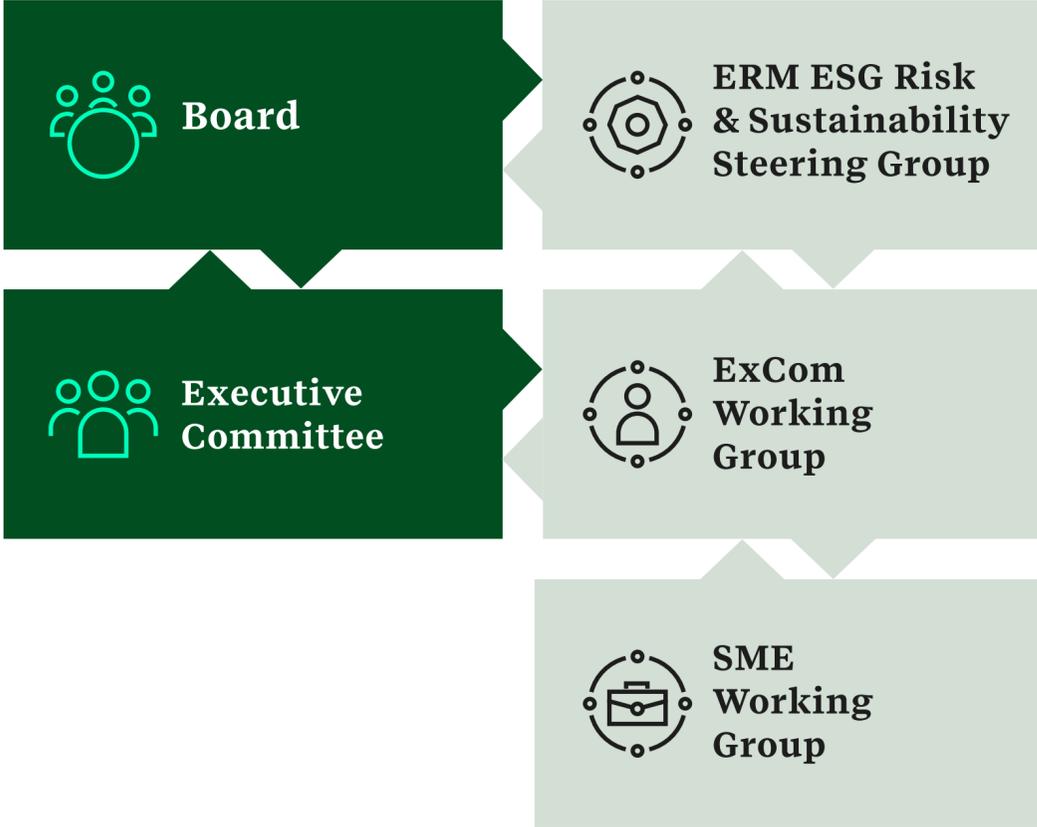
The remainder of this statement is structured as follows to provide the reader with information on our management of modern slavery risk:

1. Governance, policies and processes to proactively manage modern slavery risk
2. Our people and offices: managing modern slavery risk in relation to our offices, our people and the delivery of our work
3. Our services: managing modern slavery risk in our service delivery and supporting our clients to manage and report on modern slavery risk in their own operations
4. Our supply chain: managing modern slavery risk arising from our use of suppliers across our global operations
5. Our partnerships: opportunities to collaboratively raise awareness around modern slavery
6. Performance, grievance mechanisms and remedies
7. Reporting

# 1. Governance

## Our structure

The Board of Directors and Executive Committee are ERM’s highest governing bodies. 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. It works in conjunction with the Board to oversee the identification and mitigation of risks relating to ESG and reputation, including human rights and modern slavery risks.



The Executive Committee (ExCom) which feeds into Board, has accountability for managing the sustainability impacts of the organization, including human rights and modern slavery risks throughout our operations. The ExCom meets seven times a year to discuss operational performance and to ensure key strategic responses to human rights related risk and opportunity are being implemented effectively. The ExCom is supported by the ExCom Sustainability Working Group, which advises on all aspects of operationalizing sustainability across our value chain, including our management of modern slavery risks through strategy, programmatic priorities, target setting and resourcing. The Working Group reports into ExCom on all aspects of operational sustainability strategy, performance and reporting and is supported by our subject-matter experts across all aspects of sustainability, including human rights and modern slavery management.

Supporting ExCom are our operational and business senior leadership, who are responsible for our performance and adherence to organizational policies and programs, including our approach to Human Rights and management of modern slavery risks across the value chain.

### Leadership and accountability

The promotion of human rights and management of modern slavery risks is fundamental to ERM’s purpose and is led from the top of our organization, our CEO.

ERM’s Global Head of Sustainability and Risk (GHSR) has overall accountability for our strategic approach to risk, which includes those risks associated with

Modern Slavery. Our GHSR is a member of ERM’s Board and ExCom, co-chairs and convenes the ESG Risk and Sustainability Steering Committee to the Board and chairs the ExCom Sustainability Working Group. Our GHSR works in conjunction with our Group General Counsel and Chief Compliance Officer, to oversee compliance with the UK Modern Slavery Act (2015), and the Australian Modern Slavery Act (2018) and the Canadian Modern Slavery Act (2023). Their work is supported by our senior leaders, including our Global Director for Sustainability, Head of Risk and Head of Sustainability, and supported by wider functional leads across the business, including People, Clients and Services and Procurement, amongst others.

Across our global operations, our partners assume a key leadership role in implementing our global approach. In accordance with the UN Declaration of Human Rights, ERM also believes it is the individual and collective responsibility of all our employees to respect and promote human rights. To this end, all employees are expected to demonstrate leadership in our management of modern slavery risk. Our employees receive training and are empowered to report any concerns they may have through our Legal and Compliance, project management hierarchy or through our helpline, further details of which are subsequently set out in this Statement. We will continue to work on enhancing awareness and understanding of modern slavery risks across the business and to provide catered guidance to specific sections of our employee base, including our office managers, facilities, procurement and project management personnel.

## Policies

As part of our ongoing support for the promotion of international human rights, we have continued to use our participation in the UNGC and other international developments as the basis to improve our policies, procedures, and approach to business. All policies referred to in this section can be viewed on [erm.com](https://erm.com).

We express our commitment to conducting business with uncompromising honesty and integrity through our business values, professional standards, employee training and our internal systems and practices.

Human rights is embedded in our operational governance: our [Business Code of Conduct and Ethics](#) is available in 18 languages and all employees must act in accordance with this. Our Code sets out clear and unequivocal requirements on adherence to the highest ethical standards.

As reported in FY23 our [Human Rights, Modern Slavery and Child Labor Policy](#) was updated to further align with emerging best practice. Our policy prohibits the use of child or forced labor in our own operations and that of our supply chain and any involvement by ERM with organizations that support prohibited labor practices or human trafficking. This policy works in conjunction with ERM's purpose and beliefs and Code of Business Conduct and Ethics.

ERM's [Sustainability Policy](#) articulates our commitments to sustainability, including social and economic development of communities, which can meaningfully contribute to the alleviation of modern slavery. The policy applies globally to all ERM entities and all ERM employees. Our policy framework and corporate governance disclosures are mapped in ERM's Sustainability Report, the Global Reporting Initiative (GRI) Index, and in ERM's Communication of Progress to the UNGC.

Specific to our supply chain:

Our [Supplier Code of Conduct](#) outlines our commitment to working with suppliers who have embedded sustainability, diversity, and ethical practices within their own organization and supply chain. It contains specific reference to labor and human rights and articulates that suppliers we work with must have public commitments and processes in place to prohibit slavery in all its forms across the supply chain,

and prohibit unlawful discrimination and harassment of workers. ERM contractually binds our suppliers to our Supplier Code of Conduct.

Our Partners use our purpose, values, policies, and internal governance arrangements to support our working culture based on sustainability principles, which includes fair labor and treatment to all.

## Risk management

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 regions or geographies face, but also the common driver of protecting and promoting human rights which unites us and our stakeholders globally. A further detailed assessment of geo-political specific human rights risk, will be undertaken in FY25.

An annual assessment of our human rights-related risks, opportunities and impacts is undertaken by our Group Sustainability and Risk function, working in conjunction with other functions and operational units. This assessment also informs our double materiality assessment process and material risks are fed into our enterprise risk management register. The register is actively reviewed and updated throughout the year on the basis of additional emergent risks and is used to inform our strategic and operational planning, including our Human Rights operational program and strategy. We have introduced a risk-based project screening requirement to help us identify more systemically the potential adverse human rights impacts of our project work with clients, enabling us to take the appropriate measures to avoid causing, contributing or being linked to such impacts.

For further information, see the ERM Sustainability Report and ERM Human Rights Strategy.

## 2. People and offices

ERM's primary asset is our people, just over 8,000 of whom work in our operations, with our clients and suppliers, and engage with our wider stakeholders. Below are some of the ways in which we seek to manage risk of modern slavery within the management of our people.

### HR management

ERM has an extensive People Function operational across our global operations and addressing the breadth of our people function, from recruitment and retention to employee management, health and wellbeing, and professional career development. As part of introductory mandatory training, ERM employees are required to review our Global Code of Business Conduct and Ethics, Sustainability Principles, and Modern Slavery training within the first two months of joining the firm. Compliance is actively reviewed by our Group Learning and Development, Legal and Sustainability teams.

### Training

The delivery of our human rights and modern slavery risk management is the individual and collective responsibility of all employees at ERM. To reflect this, in FY24, we have expanded our mandatory human rights and modern slavery training module to encompass all employees, regardless of position or seniority. All employees must also complete refresher training to ensure their knowledge and awareness remains up-to-date.

### Dialogue and discussion

We encourage an open dialogue about modern slavery, both within our business and with our wider stakeholders. Through this we believe that our collective understanding of this challenging topic can be enhanced and we both contribute to but also learn from the shared discussion.

### Our offices

We have offices in over 40 countries but our work has an even broader geographical reach. Our management of modern slavery is, therefore, global in its approach whilst recognizing that the profile of modern slavery risk can vary on a country or regional basis, subject to a range of factors including geo-political and socio-economic context.

Our offices are run by our Operations and Facilities Teams, under the leadership of our business unit senior leadership. All offices operations must adhere to our global management policies and protocols, including those pertaining to Human Rights and Modern Slavery. During FY25, we will be further developing guidelines to equip our office management staff with further understanding of how modern slavery risks may arise in relation to this specific aspect of our operations. We will also commence further due diligence assessments of those companies with whom we lease our offices, as part of our supply chain management strategy.

### Conducting our work with clients and in-field

As a leading provider of sustainability consultancy services, including environmental, health, safety, risk, social and human rights consulting amongst others, we have a broad sectoral coverage, encompassing clients across industry sectors. We provide both office-based services and on-site work all over the world. Our work takes us to a diverse range of locations including manufacturing plants, construction sites, mine sites, offshore and onshore rigs, factories, agricultural and rural areas, amongst many others. We are alert to the potential for our employees to observe modern slavery whilst 'in-field', on client sites and/or sites owned and managed by third parties. Our training to employees emphasises the importance of remaining vigilant to this potential and reporting any suspected incidence of modern slavery through the appropriate channels, as outlined in our Grievance Mechanism section of this Statement.

## 3. Our services

### Due diligence of clients and projects

ERM is committed to identifying and addressing impacts to human rights and modern slavery throughout our value chain, driving better performance across all our operations. We undertake a range of due diligence to assess potential risks around human rights and modern slavery arising from the delivery of our work and have remedial measures in place to address behaviors and practices which we consider inconsistent with our Human Rights Policy. We encourage all employees, clients, suppliers, and the wider general public to raise ethical and legal concerns about the operations of ERM or its supply chain, including potential human rights concerns. We treat all concerns raised seriously and have a zero-tolerance approach for retaliation.

Our CRM tool includes pre-screening of potential clients to identify potential issues with the sustainability performance of prospective clients, this including an ESG risk assessment. All opportunities must be recorded on the system which includes screening questions on the nature of the work to be undertaken. If the screening identifies the potential for such impacts, the opportunity must then be taken through the ERM Sustainably Transparent Assessment of Risk and Reward (STARR) process.

The STARR process provides a framework for further due diligence of those projects identified as potentially having a higher sustainability risk, including potential impacts to nature. The opportunity lead must provide further information which is then considered by our Global Head of Risk and further information or mitigation measures may be required, if appropriate.

### Impact of our services

As a leading provider of sustainability consultancy services, including environmental, health, safety, risk, social and human rights consulting amongst others, we have a broad sectoral coverage, encompassing clients across industry sectors. Our most material risk and opportunities exist with respect to the services we provide to clients, how these are conducted and the impact which they can generate with respect to management of modern slavery risks.

We provide specialist expertise to clients supporting them to manage the social impact of their own operations, including management of modern slavery risk. We also undertake work for clients across a much broader spectrum of services and are working to identify and manage the risk of modern slavery within these, particularly in services such as low carbon energy transition and permitting where risks may emerge in respect of where and how client projects may be located, constructed and operated.

### Conducting our work with clients and in-field

We provide both office-based services and on-site work all over the world. Our work takes us to a diverse range of locations including manufacturing plants, construction sites, mine sites, offshore and onshore rigs, factories, agricultural and rural areas, amongst many others. We are alert to the potential for our employees to observe modern slavery whilst 'in-field', on client sites and/or sites owned and managed by third parties. Our training to employees emphasises the importance of remaining vigilant to this potential and reporting any suspected incidence of modern slavery through the appropriate channels, as outline in our Grievance Mechanism section of this Statement.

### Our human rights capabilities

For over 50 years, ERM has helped clients to understand human rights, prevent or remediate negative impacts, and go further to operate in a manner that respects and advances human rights. We combine an intimate understanding of emerging international and national requirements with practical on the ground experience to support clients in understanding and fulfilling their human rights responsibilities. This helps protect access to capital, develop and maintain a social license to operate, and ensure regulatory compliance. Our multidisciplinary teams are at the forefront of human rights and environmental regulatory developments.

We advise clients on a range of issues relating to modern slavery, including due diligence; policy and strategy development; training; gap, risk, and impact assessments in operations and supply chains; and disclosures. More detailed information can be found in our Human Rights Strategy.

## 4. Supply chain

The nature of ERM’s business as a services company means that we subcontract services to support the delivery of our work. This is an area where the potential for modern slavery exists beyond our direct operational control. Our focus in FY24 and continuing in FY25 is, therefore, on identifying the opportunities to further strengthen our visibility, management and remediation of modern slavery risk in our supply chain.

To this end we have strengthened our requirements from all suppliers in respect not just of adherence to our policies and procedures on human rights and sustainability more broadly, but we have also instituted new requirements for suppliers to document their own policies and management.

### **New procurement**

In FY24, we further strengthened our requirements for data on prospective suppliers’ approaches and management of human rights, setting out new specifications in one of our top spend procurement exercises. This will be further rolled out to wider top tier supplier spend as new procurement exercises are undertaken.

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.

### **Screening of eligible subcontractors**

ERM’s process for engaging subcontractors includes the use of a third-party supply-chain risk management solution to identify potential or known risks. We combine this with our Active Leadership Audit Program and subcontractor qualification assessments to collate and evaluate data on our use of subcontractors to ensure we are adequately managing and mitigating risk. 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 where an elevated risk is assessed to exist. A high degree of due diligence is conducted when engaging labor brokers, especially in high-risk jurisdictions. We will continue to focus on this during FY25.

We require all subcontractors and third-party suppliers to act in accordance with our Supplier Code of Business Conduct and Ethics (“Supplier Code”), which includes specific clauses around human rights and modern slavery, and our broader Human Rights Policy. Our standard contractual Terms and Conditions bind suppliers to our Supplier Code and therefore provide explicit expectations and requirements in respect to addressing human rights, including modern slavery. 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 were all updated with the supplier code.

### **Ongoing management of our subcontractors and wider supply chain**

Through our subcontractor management system, we introduced new data and performance reporting requirements during FY24. All subcontractors on our system are now requested to provide information on their approach and management of human rights risk, including that of modern slavery.

During FY25, we will further engage with our subcontractors on the issue of human rights and modern slavery and expand engagement across the top tier of our supplier spend. Our focus will remain on identifying and capitalizing upon opportunities to strengthen our procedures, enhance visibility, engage and reduce risk. For further details, refer to the ERM Sustainable Supply Chain Strategy.

## 5. Our partnerships

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. We comply with the applicable trade sanctions and anti-money laundering laws. To do this, ERM conducts a due diligence screening process to check those with whom we seek to form relationships.

In addition to our ongoing internal program of action and work for clients on modern slavery issues, ERM participates in a number of external engagements and strategic international partnerships pertaining to modern slavery and human rights. We act as advisors to multinational corporations on all issues related to climate change, human rights, UN Global Compact initiatives, OECD standards, and the Sustainable Development Goals.

For further information please see ERM's Human Rights Strategy and Sustainability Report.

## 6. Grievance mechanisms and remedying adverse impacts

### **Project management model: supporting the delivery of our project work**

Our project management model ensures that all ERM work is led by a Partner in Charge (PiC) with the support of a Project Manager (PM). It is the responsibility of the PiC and PM to ensure that all projects are conducted in accordance with ERM's policies and processes, and pursuant to ERM's purpose of being a sustainability leader. Should the Project Management Team have any concerns about the current or future direction of the project, they are required to report these to the client relationship manager, Business Unit and Legal Counsel, as appropriate.

### **The ERM Helpline**

Our reporting system, The ERM Helpline, was implemented in 2018 and is a service hosted by a third-party provider, Navex. It is available 24 hours a day, 365 days a year by phone or online and is available in 30 languages. Concerns about our business operations and any other form of unethical business conduct, including activities which may negatively impact biodiversity and nature can be reported anonymously in confidence and without fear of retaliation.

### **Client concerns**

Clients can report concerns through ERM's client feedback program. The approach uses a global project and client management tool, Salesforce, 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.

### **Public concerns**

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

### **Remedy**

ERM is committed to investigating, addressing and remedying where possible and appropriate. We will take all appropriate measures to protect those who raise modern slavery issues, as set out in our Whistleblowing Policy and issues can be raised anonymously through the ERM Helpline.

Our protocol for managing issues raised includes:

- Exploration of the issue or concern with the stakeholder who identified it (if known) and wider operational or project management team (if internal).
- All modern slavery concerns will be escalated internally with appropriate business personnel, including Sustainability, Risk and Legal functions.
- As appropriate, Legal will report to Executive Committee on the issue of concern and any proposed remediation which has been identified during the course of investigation.
- Where the reported issue involves clients or client contractors and suppliers, the issue will be explored with the client and remedial measures identified.
- Where appropriate, ERM will engage third parties, including law enforcement stakeholders to investigate identified potential incidences of modern slavery.

We are committed to addressing any issues promptly but do not put time limits of the duration of time we will take to investigate issues and identify appropriate remedy. We will, however, maintain engagement with those involved during the course of this time.

### **Tracking and monitoring**

- We continue to learn more about modern slavery and human rights-related risks based on direct feedback from our delivery teams. We continue to incorporate this learning into the corresponding risk tools.
- Throughout FY24, we evaluated how to improve how we track and evaluate the effectiveness of our responses to actual and potential human rights impact, 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 on our processes to date.

## **7. Reporting**

This Statement forms part of our ongoing commitment to transparent and accessible reporting for the benefit of all stakeholders and reflects our commitment to international efforts to abolish all forms of modern slavery. Our wider reporting on human rights issues, which includes modern slavery, includes:

- Annual disclosure of our sustainability performance in our Sustainability Report.
- Our progress in upholding the 10 principles of the UNGC and the Women's Empowerment Principles are reported annually via the Communication on Progress which is published on the UNGC website.
- Our 'Supporting the SDGs' document provides a snapshot of ERM's contribution to the United Nations Sustainable Development Goals which includes Goal 8.7 on the eradication of all forms of modern slavery.

ERM's previous published Modern Slavery Statements are available on [erm.com](http://erm.com).

Consultation:

Our policies, programs, and practices are global, and each ERM entity is subject to the same standards of conduct outlined in this statement. We have consulted with the relevant entities that we own and control regarding this statement and our approach to human rights and modern slavery. This statement has been signed on behalf of all relevant ERM entities by the Group CEO. A full list of ERM entities can be found on our website.

# Our priorities for FY25

We will continue to implement our program of action focussed on evolving our governance and management of human rights and modern slavery across our value chain, as set out in our Human Rights Strategy. The Strategy will be reviewed annually to assess the effectiveness of our governance and further actions will be taken as required to support our management of modern slavery risk.

We reaffirm and recommit our goal of respect for human rights and a world free of slavery for all. In pursuit of this goal, we will make efforts that extend beyond our own immediate organizational interests. Alongside setting internal goals, we will continue to participate in building external standards and providing education so that momentum builds beyond our own sphere of business influence, fully aligned with our purpose of shaping a more sustainable future with the world’s leading organizations.

Area	Targets
Governance	Undertake three regional/sectoral Human Rights due diligence assessments to further understand modern slavery and wider human rights risk in specific geographies.
People & Offices	<p>Renew engagement and communications across our operations to enhance employee awareness and active consideration of modern slavery through all our activities.</p> <p>Review and update the Modern Slavery training as appropriate and continue to actively review compliance.</p> <p>Develop further guidance to specific teams including office management, facilities, procurement and project management personnel on modern slavery risks.</p>
Services	We will look to embed social advisory work, including modern slavery risk management, within all our service lines.
Supply Chain	Engage the top tier spend of suppliers on human rights to further understand governance and performance across this tier of our supply chain. For further detail, see ERM’s Sustainable Supply Chain Strategy on erm.com.
Partnerships	Continue our participation in key collaborations such as the WBCSD, UNGC and wider as appropriate.



Sustainability is our business