



Modern Slavery Statement 2025

ERM CEO
Tom Reichert

CEO Foreword



At ERM we are committed to shaping a sustainable future with the world's leading organizations. As the largest specialist global sustainability consultancy with an ecosystem of clients, partners and suppliers, we constantly take steps to ensure that we minimize the risk of modern slavery in our own operations and across our value chain. We are committed to this goal in recognition of 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 (SDGs).

This statement is published pursuant to section 54(1) of the UK Modern Slavery Act 2015 and voluntarily disclosed in accordance with best practice, consistent with the principles of section 14 of the Australian Modern Slavery Act 2018 (Joint Modern Slavery Statements) and section 11 of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023.

It constitutes the Modern Slavery Statement 2025 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 2025, can be found on erm.com.

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. This Statement describes the specific action undertaken in the fiscal year ending 31 March 2025 (FY25) and notes plans for the next fiscal year (FY26).

Signed on behalf of the Board of Directors and Executive Committee
Tom Reichert, CEO

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 CEO.

A full list of ERM entities can be found on our website.

The ERM International Group Ltd
Company registration no: 1339605

Our collective responsibility to address modern slavery

WHAT IS MODERN SLAVERY?

The term modern slavery encompasses those activities which involve the exploitation of others and encompasses a range of activities which includes human and sexual trafficking, forced labor, bonded labor, child labor, forced marriage and all forms of slavery-like practices.

Eradicating modern slavery is a global challenge which unites public and private sectors, organizations and individuals alike. We all have a collective role to play in eradicating modern slavery, and respecting human rights for all.

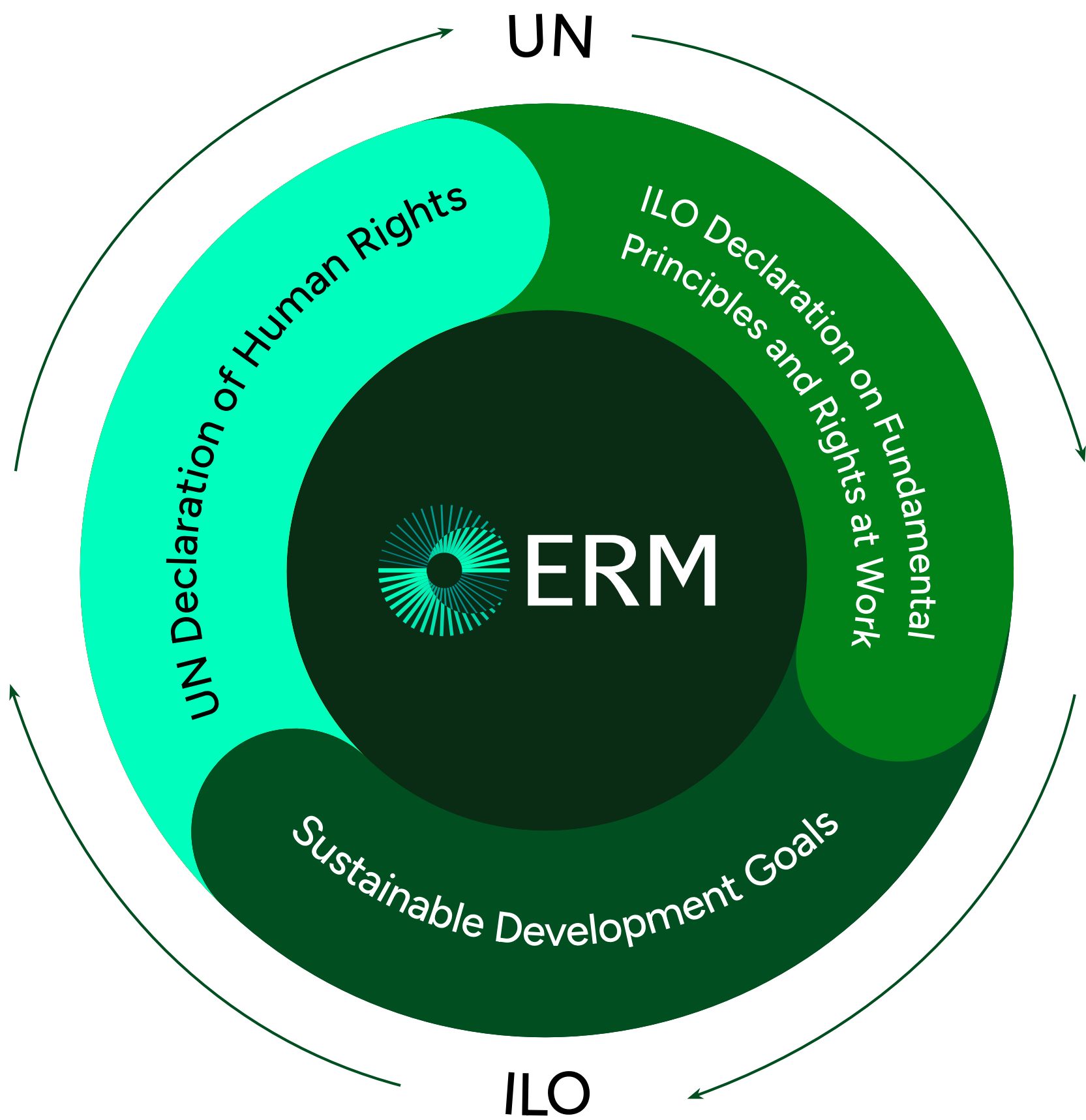
Forms of Modern Slavery

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

OUR ROLE

At ERM, we recognize our role in supporting the fight against modern slavery, in particular, through our own operations and our supply chain. We also recognize the role we have to play in our business partnerships and the organizations we collaborate with.

We are fundamentally committed to respecting and promoting human rights for all, as set out in our ERM Human Rights Strategy and consistent with the UN Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work and UN Sustainable Development Goals (SDGs).

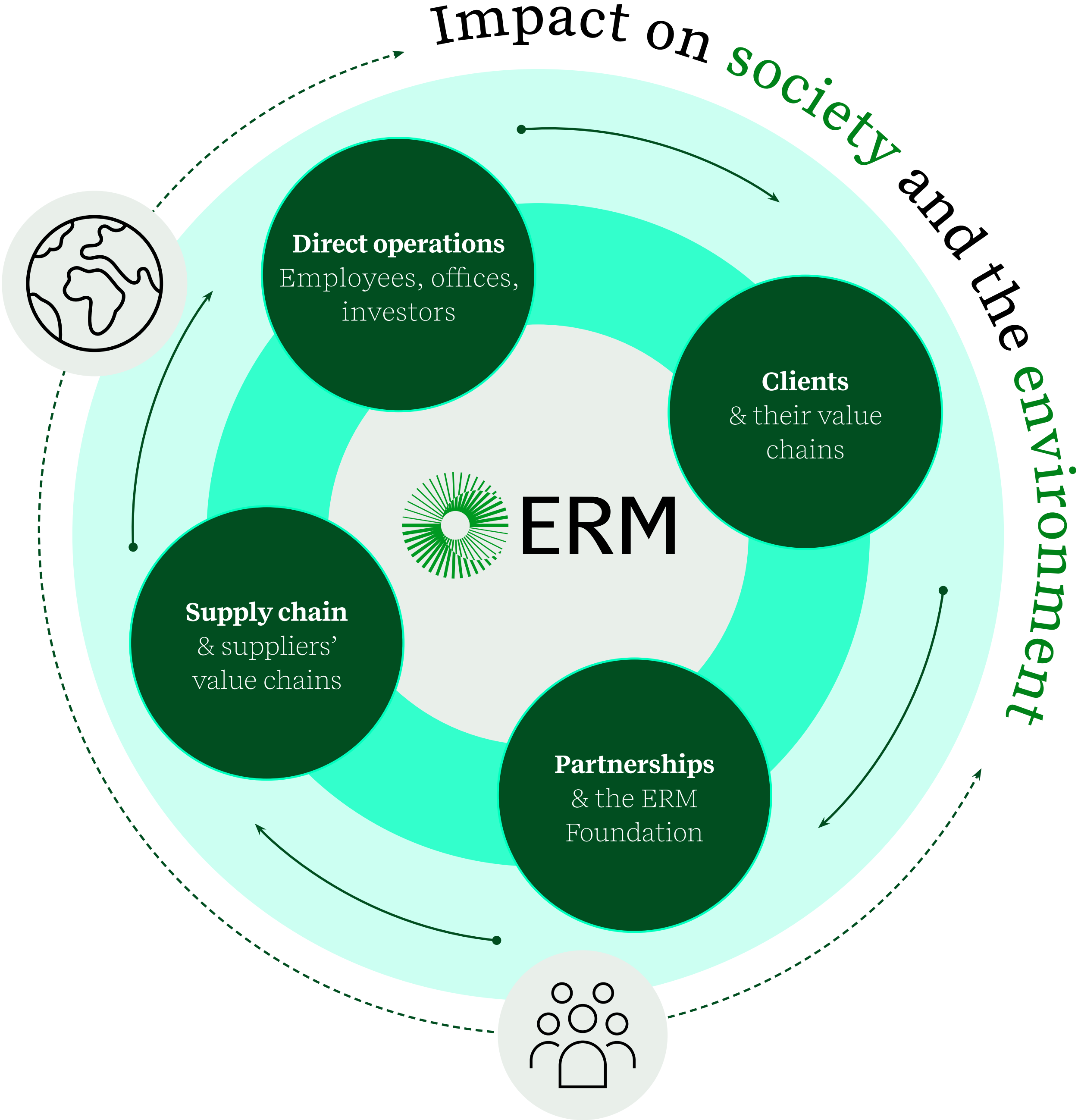


OUR VALUE CHAIN

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 (UNGC) to address modern slavery in all its forms.



Upstream

Our upstream value chain includes 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

Our downstream value chain encompasses: 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 operations

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

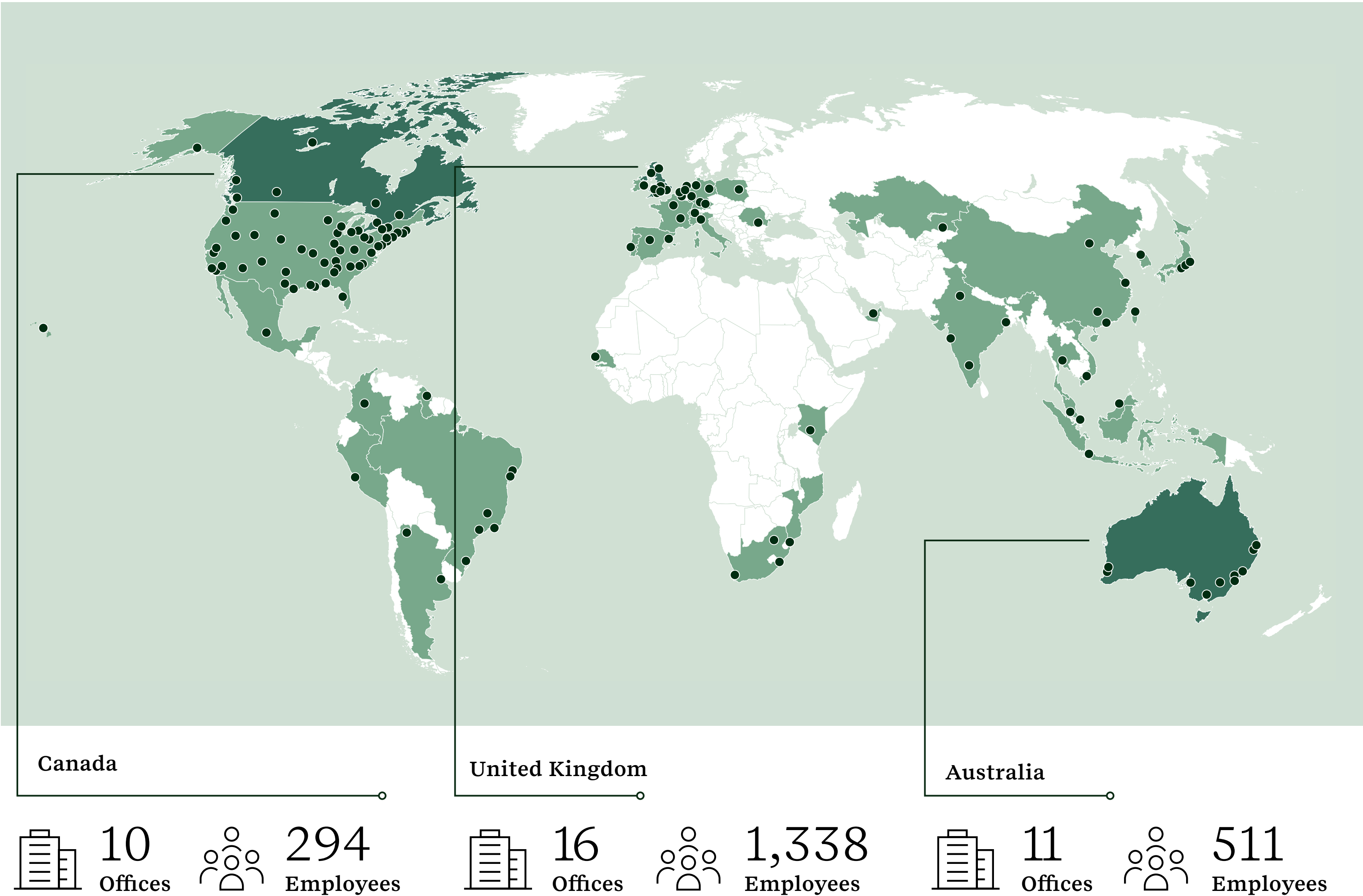
We operate primarily from our offices of which we have 149, located in over 40 countries and territories. We also conduct work from client offices and assets and undertake field work to support our services to clients.

OUR STRUCTURE

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.



A full list of The ERM International Group Limited's subsidiaries can be found on our [website](#).

OUR SERVICES AND SUPPLY CHAIN

The nature of ERM’s business as a services company means that we use suppliers to support the delivery of our work.

ERM is supporting companies around the world as they are responding to the ever-growing and evolving sustainability imperative. From meeting regulatory requirements to driving full-scale business transformation, we support clients at every stage of their sustainability journey.

Our global supply chain spans the full reach of our offices and the countries in which we operate. Our diverse supplier base is essential to the smooth functioning of our business and enables us to deliver seamless, high-quality services to our clients. We recognize that this is an area where a potential risk of modern slavery exist beyond our direct operational control and where we have the opportunity to use our influence.

The measures which we are undertaking in respect of our supply chain are set out in this Statement and information on our broader approach to sustainable supply chain management is outlined in the [ERM Sustainable Supply Chain Strategy](#).



Contents

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

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1 Governance, policies and processes

Our structure

The Board of Directors and Executive Committee are ERM’s highest governing bodies. The ERM Board, hereafter referred to as ‘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.

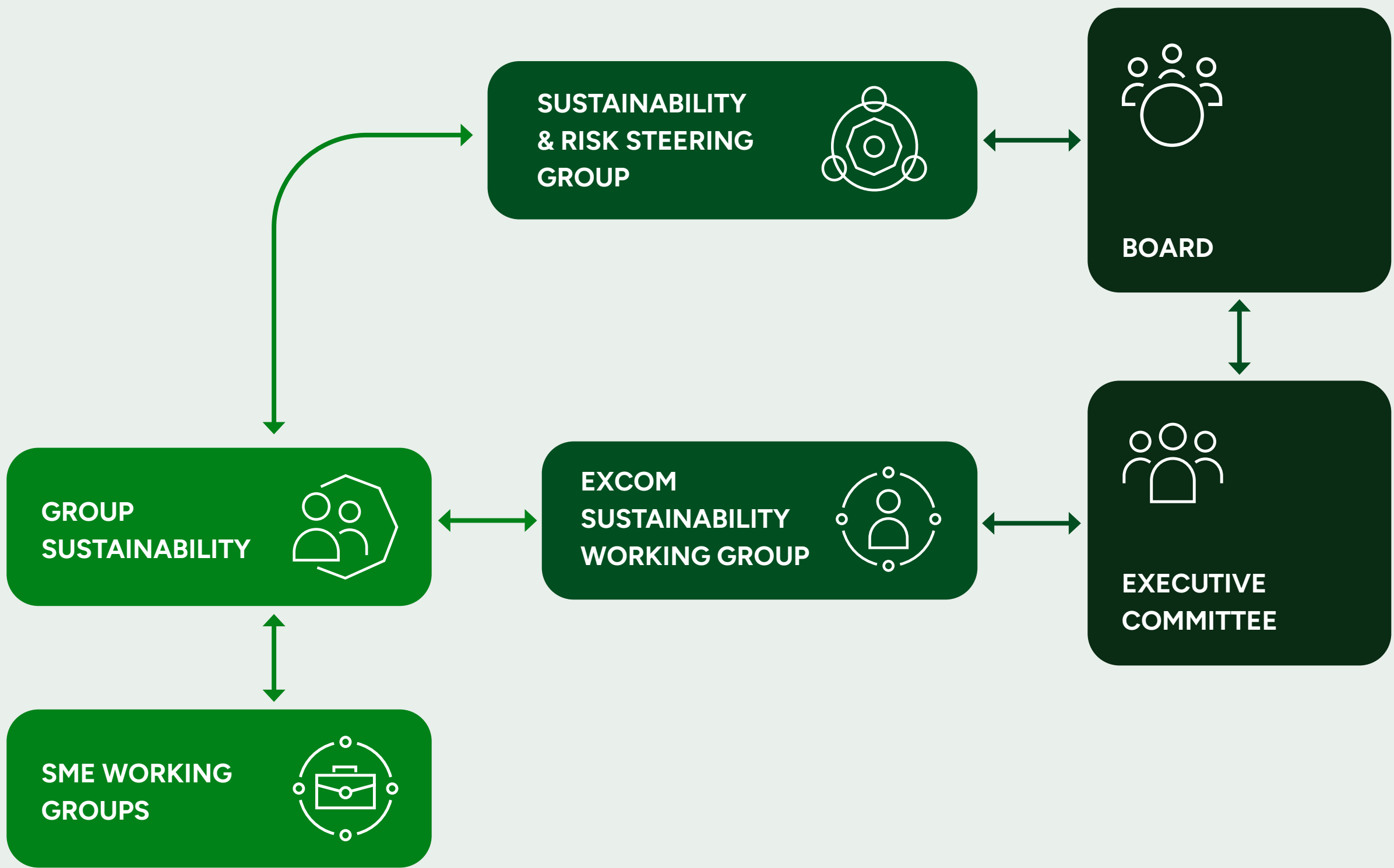
The Sustainability & Risk Steering Group serves as an advisory group to the Board. It works in conjunction with the Board to oversee the identification and mitigation of risks relating to sustainability and reputation, including human rights and modern slavery risks.

The Executive Committee (ExCom), which feeds into the Board, has accountability for managing the sustainability impacts of the organization including human rights and modern slavery risks. The ExCom meets six 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.

This Statement has also been supported by the ExCom Sustainability Working Group, which comprises Legal, Finance, Operations and Sustainability global functions and whose remit is to support the content and publication of ERM’s sustainability-related disclosures.

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, by the 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 Sustainability & Risk Steering Group to the Board and chairs the ExCom Sustainability Working Group.

Our GHSR works in conjunction with our General Counsel and Chief Ethics and 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 Head of Risk and Head of Sustainability and supported by wider functional leads across the business, including People, Clients, 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 Legal & Compliance, the project management hierarchy or through our **Speak Up Helpline**, further details of which are subsequently set out in this Statement.

Policies

As part of our ongoing support for the promotion of international human rights, we have continued to use our participation in the UN Global Compact and other international initiatives as the basis to improve our policies, procedures and approach to business.

HUMAN RIGHTS IS EMBEDDED IN OUR OPERATIONAL GOVERNANCE

Our **Global Code of Business Conduct and Ethics** is available in 15 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.

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.

Our **Human Rights, Modern Slavery and Child Labor Policy** was updated in 2024 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 **Global 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 UN Global Compact.

SPECIFIC TO OUR SUPPLY CHAIN

Our **Supplier Code of Conduct and Ethics** 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.

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.

All policies referred to in this section can be viewed on **erm.com**.

Risk Identification

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 company-wide 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 or 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 directly tied 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 planning. Strategic risks, including human rights-related risks, are identified and assessed through our risk management processes and included in our risk register.

We have introduced a risk-based project screening requirement to help us identify more systemically 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 consider geopolitical risk within the context of our business strategy and risk management program; we consider the implications within our own operations as well as our work at the sector, client and project levels.

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.

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 our clients, contractors and other business relationships. ERM’s system for this compliance is integrated within our client relationship management (CRM) tool.



Enterprise risk management

ERM’s enterprise risk management system is overseen by our GHSR and is subject to ongoing review and development.

Our 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 framework and our strategy.

Opportunities are screened for potential sustainability risks, including human rights and modern slavery, biodiversity and climate impact. Our sustainably transparent assessment of risk and reward (STARR) process is a first step prior to engagement with a client.

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 values. 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 material impact on the business, or project risks are material to the business, or a project failure could have material impact on the business. The process involves senior experienced business leaders and technical specialists supporting the team throughout the project.

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

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

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 FY25, 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.

2 Management of our direct operations and supply chain

Management of modern slavery risk

During FY25, we undertook a detailed assessment of our human rights risks, focusing on selected countries within which we operate. The assessment supported our undergoing review of identifying where evolving modern slavery risk exists within our operations and how best to proactively manage such risk.



Our people

ERM’s primary asset is our people, just over 8000 of whom work in our operations, with our clients and suppliers and engage with our wider stakeholders.

HR MANAGEMENT

ERM has an extensive People function operating across our global business and addressing the breadth of our people-related topics, from recruitment and retention to employee management, health and wellbeing and professional career development.

As part of introductory mandatory training, ERM employees are expected 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.

TRAINING

The delivery of our human rights and modern slavery risk management is the individual and collective responsibility of all employees at ERM. In FY25, we continued to review our mandatory human rights and modern slavery training module to reflect our evolving understanding of where and how risks of modern slavery exist and how we should manage these appropriately. We will continue to evolve our training during FY26. 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. In support of this, we have launched a new communications campaign across our offices which seeks to further raise awareness around common signs of modern slavery and how to report these. This campaign will continue throughout FY26.

Our operations



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 recognising that the profile of modern slavery risk can vary on a country or regional basis, subject to a range of factors including geo-political, regulatory 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. Office management teams are required to undertake specific training related to modern slavery.

During FY25, we developed and disseminated new guidance to our office management staff to support their understanding of where and how risks of modern slavery may materialise within the operation of our offices across the globe and how best to manage these. The guidance equips our office leads to engage all those involved in procuring services, maintaining

our facilities and engaging with personnel. Detailed within the guidance was also clear signposting on our processes and protocols for reporting and escalating concerns, and information posters for wider publication in our offices.

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 outlined in the Grievance Mechanism section of this Statement.

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. This is an area where the potential for modern slavery exists beyond our direct operational control.

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. 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 FY26.

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 & 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 as part of its implementation.

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.

Our focus will remain on identifying and capitalising upon opportunities to strengthen our procedures, enhance visibility, engage and reduce risk. For further details, please refer to the [ERM Sustainable Supply Chain Strategy](#).

SCREENING OF THIRD PARTIES

ERM has established internal procedures for vetting third parties to help ensure that our business partners are not engaged in suspected practices related to human trafficking. We have mandatory training in place for those in a project or operational managerial capacity to strengthen their awareness and understanding of human trafficking and how to take action if they have any concerns regarding our business partner activities.

SUSTAINABLE PROCUREMENT POLICY

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

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 modern slavery and 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.

3 Our services to clients

Supporting our clients with management of modern slavery risks

Our most significant impact with respect to managing modern slavery risk, 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 context across the globe, our social and human rights consulting services teams act as advisors to companies in a diverse range of sectors at the corporate and asset levels to conduct human rights due diligence and manage social impacts.

We have expertise in a wide range of human rights areas, including helping clients to identify and address supply chain impacts and risks, setting up and upgrading grievance mechanisms and reporting on human rights and modern slavery due diligence. A detailed list of our social and human rights programs can be found on erm.com and in our Human Rights Strategy..



Our Human Rights Capabilities

We have been global providers of human rights, social and environmental solutions for over 50 years and have combined our global footprint with local expertise. ERM helps clients to understand human rights, prevent or remediate negative impacts and go further to operate in a manner that respects and advances human rights, which positively contributes to their social license to operate and their shareholder value.

We have a dedicated team based in key locations around the world who have expertise in managing a range of human rights issues. 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 with in-depth human rights and environmental expertise across sustainability topics 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.

4 Our partnerships

Our partnerships

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 SDGs.

Highlighted below are some of our partnerships and engagements that allow us to deliver on our human rights strategy and prioritise the prevention of modern slavery in our own operations and supply chain and more broadly.

THE WORLD BUSINESS COUNCIL FOR SUSTAINABLE DEVELOPMENT (WBCSD)

A global, CEO-led organization of over 200 businesses working together to accelerate the transition to a sustainable world. ERM is a founding member of the WBCSD and actively participates through secondments, the involvement of the ERM SustainAbility Institute and engagement of our CEO and other senior leaders. ERM chairs the Just Transition workstream and has seconded employees into this program. We also actively participate in the Human Rights workstream.

BUSINESS COMMISSION FOR TACKLING INEQUALITY (BCTI)

ERM is a member of the BCTI, with our CEO a Commissioner on this body. We supported the launch of the BCTI flagship report on human rights and are part of the corporate action to address rising inequality which is inextricably linked to modern slavery.

THE UN GLOBAL COMPACT (UNGC)

The UNGC brings companies together with UN agencies, international labor organizations and civil society to support universal environmental and social principles in the areas of human rights, labor, the environment and anti-corruption. ERM has been a signatory of the UNGC since 2011 and strives to embrace and promote these values within our sphere of influence and across the supply chain. ERM is a signatory of the Women’s Empowerment Principles as part of our commitment.

As is our normal practice, we will maintain and enhance where possible our participation in international forums regarding human rights and continue to support and promote further efforts to reduce the risk of modern slavery.



Partnerships: The work of the ERM Foundation in promoting human rights

For 30 years, the ERM Foundation has been actively involved in improving livelihoods and eliminating the economic disempowerment that drives modern slavery.

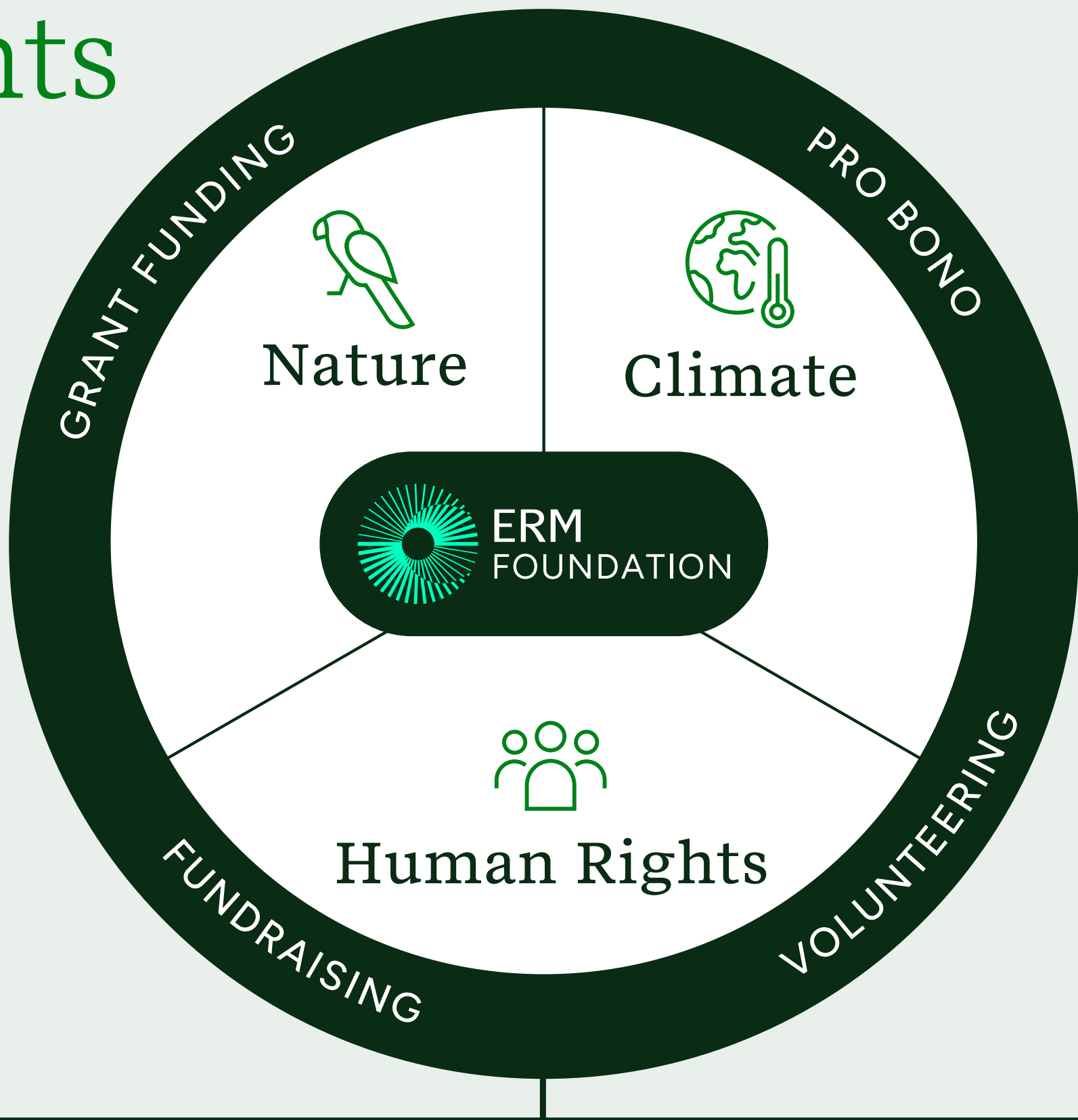
The ERM Foundation was established in 1995 to allow ERM and its employees to provide support for nonprofit organizations and social enterprises that share our commitment to creating a more sustainable and equitable world. Working across the globe for 30 years, it blends grant funding, professional pro bono support and volunteering to create a lasting impact and measurable contributions to the SDGs.

In FY25, the Foundation announced updated focus areas aligned to our sustainable operational programs and included a specific reference to human rights. This demonstrates its longstanding commitment to the protection and presentation of human rights and sustainable livelihoods globally. The Foundation has partnered with a range of organizations in FY25, providing a combination of grant funding and technical pro bono support to enhance livelihoods and support capacity building initiatives aimed towards eliminating the economic disempowerment that drives modern slavery.

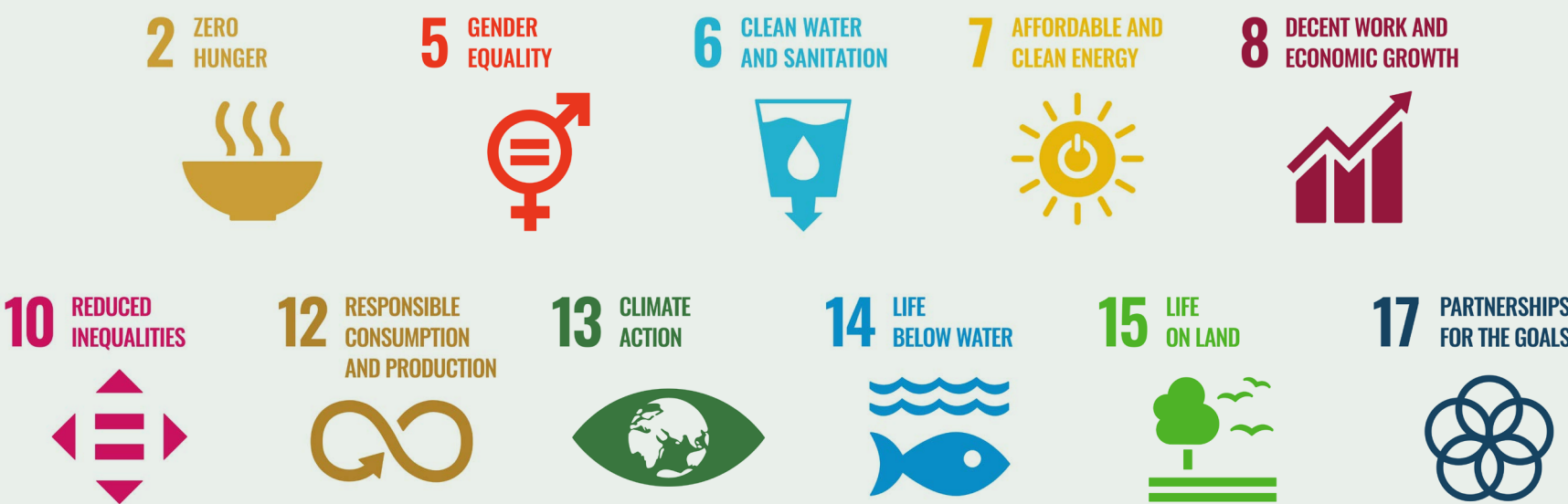
To read more about the work of the ERM Foundation, read our 2025 [Annual Review](#).

21,451
livelihoods
improved in
FY25

Almost 4 million
livelihoods supported
in the Foundation's
30-year history



Contributing to the SDGs



5 Grievance mechanisms and remedies

Grievance mechanisms and remedies

ERM is committed to identifying and addressing adverse 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.

CLIENT RELATIONSHIP MANAGEMENT: DUE DILIGENCE OF OUR COMMERCIAL OPPORTUNITIES

Our CRM tool includes pre-screening of potential clients to identify potential issues with the sustainability performance of prospective clients, this includes a sustainability 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 STARR process.

STARR: ADDITIONAL ASSESSMENT OF COMMERCIAL OPPORTUNITIES WITH POTENTIAL HEIGHTENED RISK

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 Regional Risk Director and further information or mitigation measures may be required, if appropriate.

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 leadership and Legal Counsel, as appropriate.

THE ERM SPEAK UP HELPLINE

Our reporting system, The ERM Speak Up 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 can be reported anonymously without fear of retaliation.

CLIENT CONCERNS

Clients can report concerns through ERM’s client feedback program. The approach uses a global project and CRM tool to document, internally publicize and respond to client feedback. Every project has an identified Account Director/Manager and PiC 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 social issues.

PUBLIC CONCERNS

Members of the public – individuals and communities – can communicate concerns or ask questions by emailing businessconduct@erm.com.

Grievance mechanisms and remedying adverse impacts

ERM is committed to investigating, addressing and remedying where possible and appropriate. Our protocol includes:

- Exploration of the issue or concern with the stakeholder who identified it (if known) and wider operational or project management team (if internal).
- If escalation is required, the relevant senior leadership in the business unit or region will be engaged, including Legal Counsel.
- Subject to the outcome of this engagement, the issue may be further escalated to regional and global Legal Counsel, including our Chief Ethics and Compliance Officer (CECO) and General Counsel (GC).
- As appropriate, the CECO and GC will report to ExCom 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. In the event that issues or concerns continue, and remedial measures are deemed not to have been effective, ERM will cease all activities related to the project or client operation.
- 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 on 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.

Remedy may include but is not limited to further mitigation measures integrated into project delivery, professional support for any affected individual affected and recourse to law enforcement agencies where required. We will enact further wider remedial measures as appropriate for the specific issue identified.

6 Performance and reporting

Delivering on our priorities for FY25

As noted in our FY24 Statement, we committed to undertaking specific actions in respect to our due diligence, training and communications, supply chain management and operations.

We have included commentary in respect of these within the preceding sections and include the summary to the right.

During FY25, there were no reported incidents of modern slavery.

AREA	TARGETS
Due diligence assessments	Human rights due diligence assessments were undertaken in FY25. The outcomes of these assessments has informed our FY26 Action Plan, key priorities of which are set out in our FY26 Priorities within this Statement.
Training and communications	<p>Our communications in respect of modern slavery were reviewed and updated, with communications engaging the breadth of our global operations. A new communications campaign has been launched and will continue to be implemented throughout FY26.</p> <p>Our modern slavery training was reviewed by our in-house human rights subject-matter experts and we will continue to evolve our training during FY26.</p> <p>Further guidance was produced and disseminated to our office management teams on modern slavery risk and how to manage this within the delivery of their roles.</p>
Supply chain	A detailed analysis was undertaken of the governance and performance of our top tier of suppliers with respect to human rights and modern slavery. Engagement in respect of this is underway and will continue throughout FY26.
Partnerships	We continued our participation in key collaborations such as the WBCSD, UNGC and wider fora as appropriate, with our subject-matter experts supporting collaborative efforts and thought leadership.

Training and awareness

During FY25, we have continued our ongoing engagement with staff across our operations to continue to raise awareness of modern slavery and broader human rights concerns.

As part of this ongoing engagement, we have launched a new communications campaign to enhance awareness and understanding across our offices of the risks of modern slavery.

In FY26, we plan to continue this engagement and continue to disseminate more information to our employee base across our operations, including the development of more specific regional and country-level guidance.

TRAINING

ERM requires all employees at all levels to complete mandatory modern slavery training. In FY25, our completion rate was 90%.

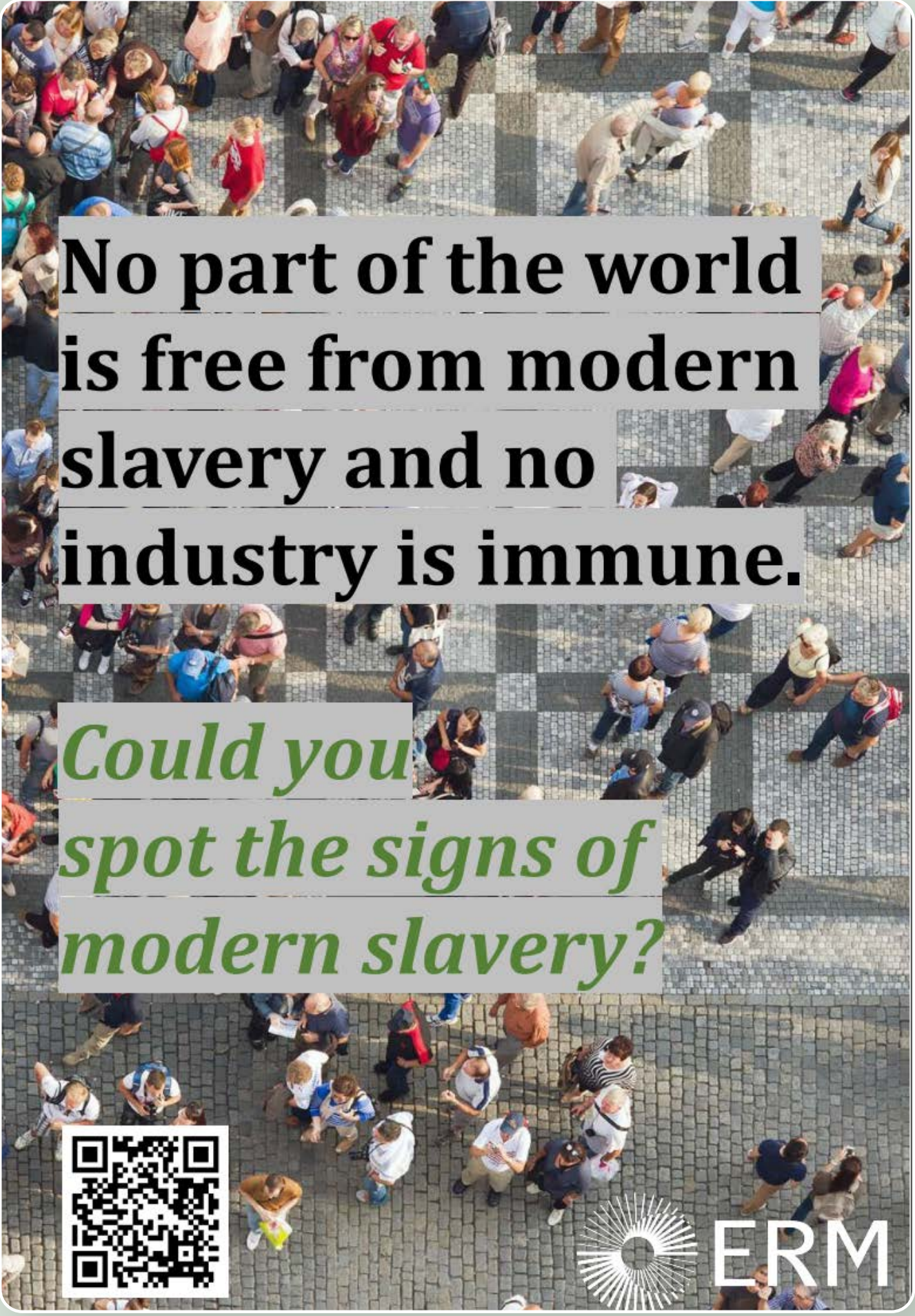
In FY25, we undertook a review of our existing modern slavery training offered to employees and have identified further opportunities to provide catered training to subsets of our staff. This is being developed in conjunction with our in-house human rights subject matter experts.

Could you... Spot the Signs of Modern Slavery





1. Isolation <i>Rarely being allowed to travel alone.</i> <i>Appearing under the control of others.</i> <i>Withdrawn and tending not to interact with others.</i>	2. Restricted freedom of movement <i>Lack of travel documents/ID.</i> <i>Few personal possessions.</i> <i>Wear same clothes day-in day-out.</i>	3. Reluctance to seek help <i>Avoiding eye contact.</i> <i>Appearing frightened, fear of law enforcers.</i> <i>Unsure of who to trust or where to get help.</i>	4. Physical appearance <i>Signs of physical or psychological abuse, such as untreated injuries or anxiety.</i> <i>Looking malnourished or unkempt.</i> <i>Wearing clothes unsuitable for their work</i>	5. Poor living conditions <i>Living in dirty, cramped, or overcrowded accommodation.</i>	6. Unusual travel arrangements <i>Always dropped off at/collected from work; and very early in the morning or late at night.</i> <i>Children dropped off/picked up at unusual times where it isn't clear why they would be there.</i>
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No part of the world is free from modern slavery and no industry is immune.

Could you spot the signs of modern slavery?



Supply Chain

Our focus during FY25 and continuing in FY26 is to further strengthen our visibility, management and remediation of modern slavery risk in our supply chain.

- During FY25, we undertook an extensive review to further our understanding and management of modern slavery risk within our supply chain, this included:
- Analysis of the composition of our supply chain across the last five years, including nature of services, geographical location and spend.
 - Identification of our top tier suppliers by spend and individual analysis of each of the suppliers within this top tier, including their publicly stated position and reporting on modern slavery risk.
 - Implementation of new requirements with respect to the provision of data and reporting around modern slavery risk management and performance for our suppliers. These requirements are being rolled out through our procurement processes and through our ERM Supplier Portal.
 - Management of modern supply chain risk will continue to be a priority for FY26, to further strengthen our visibility and monitoring of performance across our supplier base.

Our priorities for FY26

We will continue to implement our program of action focussed on evolving the governance and management of human rights and modern slavery across our value chain, as set out in our [Human Rights Strategy](#). As noted in this Statement, some of the key actions to be delivered in FY26 are summarised to the right.

AREA	TARGETS
Training and communications	Roll out campaign on raising awareness of modern slavery risk across our global operations, with targeted campaigns at key sections of our workforce.
Supply chain	Continue engagement and further enhance our management of modern slavery risk across our supply chain, including through further data gathering and monitoring and active due diligence.
Clients	Continue to embed social advisory work, including modern slavery, across our client services.
Partnerships	Continue to explore collaborative working with partner organizations, to promote awareness and proactive 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.

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 approach and performance in relation to the protection and respect of human rights across our value chain, is set out in the ERM Sustainability Report.

Our Sustainability Report provides snapshots of ERM's contribution to the SDGs throughout. The Social Impact & Human Rights section includes information on Goal 8.7, which focuses on the eradication of all forms of modern slavery.

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.



Modern Slavery Statement 2025

Sustainability is our business

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