

# ERM Modern Slavery Statement 2019

*Note: This Statement is made pursuant to section 54(j) of the UK Modern Slavery Act 2015 and constitutes the Modern Slavery Statement 2019 for ERM Worldwide Group Ltd and all its global subsidiaries. The complete list of ERM subsidiaries (which includes Environmental Resources Management Limited, ERM-Europe Limited and Emerald 2 Limited) is available for download [here](#).*



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

## 1.0 Summary of Actions taken during fiscal year ending 31 March, 2019

In the fiscal year ending 31 March 2019, the specific actions taken to progress our efforts are as follows:

- Implemented a global anonymous reporting system in August 2018 for all the 42 countries and territories in which we operate. The reporting system is a multi-lingual service hosted by a third party provider and is available 24 hours a day, 365 days a year by phone or web portal. With this system, concerns about our business operations (including modern slavery and any other form of unethical business conduct) can be reported completely anonymously and without fear of retaliation;
- Rolled out online training for our employees regarding modern slavery;
- Finalized our Supplier Code of Business Conduct & Ethics ("Supplier Code") which will be rolled out to subcontractors and third party suppliers with updated Terms and Conditions as part of our supply chain process. Each sets out explicit expectations and requirements in respect of combatting modern slavery risks.
- Published and trained personnel on our Subcontractor Management Policy and centralized our Subcontractor Auditing Procedure Policy. Both the Subcontractor Management Policy and our updated, centralized audit standards address modern slavery and human rights issues.
- Continued to update procedures, systems, and data analytics capabilities related to our own supply chain so that those improvements and information can support our efforts to identify and abolish all forms of modern slavery along our supply chain; and
- In addition to our work for clients on modern slavery matters, ERM participated in a number of external engagements and strategic international partnerships related to modern slavery in the last year. Examples include: continued participation in the Working Group on Modern Slavery facilitated by the UK chapter of the United Nations Global Compact and active involvement in the development of a WBCSD CEO guide on Business and Human Rights.

## 2.0 Our Business

ERM is a leading global provider of sustainability consultancy services, including environmental, health, safety, risk, social and human rights consulting. As a professional services firm that has operated for almost half a century, our people are our greatest asset. We have more than 160 offices in over 40 countries and territories. We provide services to clients in many locations and in all types of industries, with a focus on the following key sectors: Oil and Gas, Mining, Power, Manufacturing, Technology, Media and Telecommunications, Chemical and Pharmaceutical, and Banking and Finance.

The Board of Directors and Executive Committee are ERM's highest governing bodies. Our operational and governance structure is further detailed on [erm.com](#) in the section [about us/who we are](#) and in our [ERM Sustainability Report 2019](#). While our business is structured on a corporate model and is not a partnership in the legal sense, we use the term "Partner" to designate our top executives and leaders. Approximately 550 Partners lead ERM, and at any given time, we have between 5,000 to 5,500 people working on projects for clients around the world. We provide both office-based services and on-site work all over the world. Our work takes us to manufacturing plants, construction sites, mine sites, offshore and onshore rigs, agricultural and rural areas.

While all ERM Partners are responsible for risk management across the ERM operations and projects which they manage, the Group General Counsel and his team provide overall advice and analysis in respect of ERM's compliance with applicable laws and regulations (including the Modern Slavery Act) and internal policies and procedures (including ERM's Code of Business Conduct & Ethics and our Slavery, Child Labour and Human Trafficking Policy) and oversee any investigation as appropriate. The Group General Counsel reports to the Group Chief Executive, who is ultimately accountable to the Board of Directors for the Group's management of its risks and compliance in general. Additional support in respect of the Group's efforts to manage its Modern Slavery risks and compliance is also provided by ERM's Sustainability team. The remuneration of the Group General Counsel and the Group Chief Executive is set by the Board (through its Remuneration Committee) based against goals and targets which include, inter alia, ensuring compliance and effective risk management. The Group also publishes supporting data in its annual Sustainability Report [ERM Sustainability Report 2019](#).

As part of our work, we also act as advisors to multi-national corporations on human rights, UN Global Compact initiatives, OECD standards, and the Sustainable Development Goals (SDGs). ERM has seen a significant increase in the work we do with our clients to help them understand where risks of human rights abuses may appear in their operations or supply chains,

how they can improve their performance to avoid these risks from occurring, and/or how they might remedy any cases if discovered.

### 3.0 Our Supply Chain

Because ERM is a services company and not a products company, we focus our modern slavery efforts on subcontracted services as they are our primary supply chain. As noted in last year's statement and our description above of what we accomplished this fiscal year, management of our subcontractors continues to be our key supply chain focus.

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

### 4.0 Our Policies

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

ERM's [Sustainability Policy](#) and [Sustainability Approach](#) articulate our commitments to sustainability, and ERM became a signatory of the UN Global Compact in 2011. As part of our ongoing support for the protection of international human rights, we have continued to use our UN commitment and other international developments as a basis to improve our policies, procedures, and approach to business. Our policy framework and corporate governance disclosures [are mapped in ERM's 2019 Sustainability Report to the Global Reporting Initiative \(GRI\) Index and also to the Ten Principles of the UN Global Compact](#), which include points on anti-corruption and human rights, along with further details of operational and governance structure.

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

### 5.0 Our Next Steps for the fiscal year ending 31 March 2020

We will provide details on progress made and our performance in next year's Statement. Until that time, we intend to roll our Supplier Code out to our supply chain, maintain and enhance where possible our participation in international forums regarding

human rights, and continue to promote and support further efforts to reduce the risk of modern slavery.

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

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

Keryn James  
Group Chief Executive

**Signed: 18 September 2019 for the financial year 2019 (1 April 2018 to 31 March 2019) for ERM Worldwide Group Ltd and its global subsidiaries**