

# ERM Modern Slavery Statement 2021

Note: This Statement is made pursuant to section 54(i) of the UK Modern Slavery Act 2015 and constitutes the Modern Slavery Statement 2021 for ERM Worldwide Group Ltd and all its global subsidiaries. The complete list of ERM subsidiaries as at 31 March 2021 (which includes Environmental Resources Management Limited, ERM-Europe Limited and Emerald 2 Limited) is available for download [\[here\]](#).



This Statement should be read in conjunction with our [previous UK Modern Slavery 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 2021 and note plans for the next fiscal year.

## 1.0 Summary of Actions taken during fiscal year ending 31 March, 2021

In the fiscal year ending 31 March 2021, the specific actions taken to progress our efforts are as follows:

- International anti-money laundering compliance and trade sanctions requirements are key to an international system to combat the money laundering and humanitarian abuses of the modern slavery trade. Accordingly, we made significant updates to our internal anti-money laundering and trade sanction systems, including additional data capabilities about location risk. By improving oversight of our operational risk, and especially pipeline opportunity risk, we can address modern slavery risk more effectively. We believe that improving data collection and communication throughout our organization is particularly important due to the fast pace of much of our work, the quick decision making that this pace entails, and the corresponding risk measures that must be implemented. We believe that these improvements will be particularly important as our people return to “in the field, in the office” travel post-pandemic.
- Due to the fact that many of our employees did not go to a physical office due to the pandemic, we broadened internal communications on our Helpline. We also updated the Helpline system for better global coverage and reporting. As noted previously, our reporting system was implemented in calendar 2018 and 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;
- We finalized and published our [Supplier Code of Business Conduct & Ethics](#) (“Supplier Code”), which includes specific clauses around human rights and modern slavery, and rolled it out to subcontractors and third party suppliers. As part of this effort, we updated Terms and Conditions as part of our supply chain process. Our contractual updates bind suppliers to our Supplier Code and therefore provide explicit expectations and requirements in respect of combatting modern slavery risks.
- We see continual improvement as key to our supply chain approach, and we continued to update procedures, systems,

and data analytics capabilities related to our 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.

- Given the links between Diversity, Equity and Inclusion (DE&I) and Modern Slavery, we believe it is also relevant to report that we appointed a formal head of DE&I for ERM globally.
- 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: active membership of the Working Group on Modern Slavery in the UN Global Compact; participation in a World Environment Center human rights forum, an international anti-money laundering/trade sanctions forum in Berlin, and a supply chain forum with Anti-Slavery International.

## 2.0 Our Business

ERM is a leading global provider of sustainability consultancy services, including environmental, health, safety, risk, social and human rights consulting. This year is our 50<sup>th</sup> anniversary, and as a professional services firm that has operated for half a century, we are well prepared to aid our clients on their sustainability journey going forward. 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 sustainability across all industry sectors.

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/company/leadership](#) and in our [ERM Sustainability Report 2021](#). 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. Our 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 UK 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 and our Chief Compliance Officer. 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](#).

As part of our work, we also act as advisors to multi-national corporations on all issues related to climate change, 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.

As part of our charitable work with the ERM Foundation supporting the SDGs, we are actively involved in initiatives aimed at eliminating the economic disempowerment that drives modern slavery. For more information, see our [ERM Foundation Annual Review 2021](#).

### 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 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 [Purpose 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 2021 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 purpose, 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. The values contained in ERM's corporate Strategy, including 'caring for our people', 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 2022

We will provide details on progress made and our performance in next year's Statement. Our plans include making our Modern Slavery Statement a part of our Sustainability Report and changing our reporting date to earlier in line with that change. We will also provide a refresher training on modern slavery to our top leadership and begin to report on modern slavery training statistics. We will update both our project risk review system and our travel approval system as to modern slavery risk. We will also perform {at least one} geographical modern slavery risk assessment and report on those findings. As part of our DE&I programme, we will identify DE&I goals that support our efforts against modern slavery.

Further, as is our normal practice, we will 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 three 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: 27 September 2021 for the financial year 2021 (1 April 2020 to 31 March 2021) for ERM Worldwide Group Ltd and its global subsidiaries**