

## Modern Slavery and Human Trafficking Statement

### Introduction

Arup is an independent firm of designers, engineers, architects, planners, consultants, and technical specialists with over 19,000 members of staff worldwide.

At Arup we take our responsibilities around Modern Slavery and Human Trafficking very seriously and are committed to increasing our activity in this area to meet head-on the challenges that we may face. We have developed a proactive approach that focusses on our suppliers, particularly on our efforts to review, assess, and monitor high and medium risk suppliers.

We work in a professional services industry working predominantly within engineering design consultancy services and therefore our Modern Slavery and Human Trafficking risks are assessed to be low. However, we do recognise that our supply chain may pose higher risk in certain industries and locations.

We are committed to developing our policies to ensure a strong position according to our risk profile and business and to sharing our progress along the way.

This is the modern slavery and human trafficking statement of Arup Group Limited and its subsidiaries for the financial year ending 31 March 2023.

Please note that where ‘modern slavery’ is referred to below it can be inferred that human trafficking is included within such references.

Arup’s Business Integrity Leader is responsible for monitoring Arup’s compliance to commitments made in this modern slavery statement (‘the Statement’) and is accountable to the directors of Arup for reporting on Arup’s management of the risk of modern slavery in the business and/or supply chains; and that basic labour standards are met. The Business Integrity Leader provides regular updates the directors of Arup Group Limited and other relevant executive bodies regarding Arup’s compliance.

The Statement is signed by the Chair on behalf of the board of directors of Arup Group Limited.

### Modern slavery consultation process

Arup Group Limited (‘Arup’) is the ultimate parent of the wider Arup Group of companies. Arup sets and approves an overarching Statement for Arup Group companies (Arup entities) each financial year.

The Statement is reviewed and updated each year by the Business Integrity Leader, the Arup Group General Counsel and the Arup Group Ethics Committee Chair and is then formally approved by the board of directors of Arup. The Statement is communicated down to, and formally adopted by, the boards of directors of every operating subsidiary within the Group.

Where appropriate, the Statement will be supported by regional or country-specific appendices.

### Arup’s structure, operations, and supply chains

Arup Group Limited is a company registered in England and Wales under company number 01312454. Arup Group Limited sets the governance framework for Arup entities and each region is responsible for the implementation of that framework. Specific Arup entities contract with clients to provide integrated consultancy services in engineering and related disciplines, focused on sustainability and the built environment.

As these entities' primary purpose is to provide consultancy services and advice to clients, the supply chain involves minimal procurement of tangible goods or equipment for usage on projects. The supply chain does involve procurement of sub-consultants and intangible assets such as computer software or licences.

Other Arup entities support our people who work on these projects. Supply chains for these entities mainly involve contracting with corporate suppliers regarding the procurement of office-related goods, equipment, and services as part of ensuring our people's health, safety and wellbeing.

These various components of Arup and Arup entities supply chains are subject to the due diligence process described in the 'Due diligence processes in relation to modern slavery and human trafficking' section below.

The following sections of this Statement apply to Arup and Arup entities.

## **Policies relating to modern slavery**

We align our work and our business with the UN Sustainable Development Goals (SDGs) 5 – Gender Equality, 8 – Decent Work and Economic Growth and 16 – Peace, Justice and Strong Institutions which seek to end modern slavery and human trafficking.

Arup's Business Integrity Code of Practice ('the Code of Practice') confirms that Arup will work with its supply chain - clients, partners and collaborators including sub-consultants and other suppliers of goods and services - to seek to ensure that modern slavery does not feature in our supply chain. Arup publishes an external-facing version of the Code of Practice, applicable to all external parties we engage with.

## **Modern slavery risks in Arup's supply chains and operations**

Due to the scope of Arup's project-related activities and design consultancy services, the risk of breaches of modern slavery regulatory requirements within these parts of Arup's supply chain has been assessed as low.

Arup has identified that suppliers of goods and services for Arup offices may present a risk of a breach of modern slavery regulatory requirements. Suppliers of at-risk goods include Arup-branded clothing, personal protective equipment and various office-related equipment and furniture. Other suppliers of at-risk services relating to Arup offices include cleaning, security, catering, and maintenance activities.

Where Arup engages sub-consultants and suppliers of services and equipment to our offices, we seek to agree contractual terms which require compliance with modern slavery and human trafficking legislation.

Arup's recruitment processes align with modern slavery and human trafficking legislation, including, but not limited to, assurance that prospective employees align with our values and behaviours. We seek to ensure that prospective employees have the competency to carry out the role they have applied for and have done so under their own free will. We also undertake right-to-work checks and employment is conditional on them having a legal right to work in the relevant jurisdiction(s).

## **Arup's due diligence processes in relation to modern slavery and human trafficking**

Suppliers of goods and services to specific Arup offices have been the subject of manual due diligence screening during the past financial year, including in relation to modern slavery. Due diligence screening, both automated and manual, will continue, over time, to be applied to suppliers of goods and services to all Arup-offices.

Automated due diligence is increasingly being utilised to screen suppliers of goods and services. This is being achieved via the continuing implementation of a supplier on-boarding and management portal (the supplier portal). Arup's suppliers are required to confirm their compliance to relevant regulatory requirements with regards to modern slavery and will be automatically screened, via use of a third-party due diligence tool, to identify any instances of non-compliance to relevant regulatory requirements, including modern slavery. Any actual or potential non-conformances will be investigated by Arup and appropriate action taken where required.

Similarly, a combination of automated and manual due diligence screening, including for modern slavery issues, is applied to Arup's clients.

### **Modern slavery awareness training**

Arup's Ethical Conduct Policy states in part "Our values and commitment to business integrity stem from a desire to act honourably and with integrity in all our business dealings". Our Business Integrity Code of Practice supports our Ethical Conduct Policy and includes a section that details Arup's requirements with regards to modern slavery. All staff are required to complete Arup's Ethics: acting in line with our values training module, which reinforces the requirements of the Ethical Conduct Policy and Business Integrity Code of Practice.

An on-line modern slavery learning module ('the module') has been developed and published.

The module provides awareness of what modern slavery is and how it might manifest both in the workplace and in the domestic and 'out of work' environment, provides an understanding of the extent of the crime and gives information on how to spot the signs of modern slavery. There is a separate section to inform staff on what Arup is doing to protect against modern slavery and how staff should respond if they have any concerns or suspicions. The module references sources of further information globally along with support services in this area.

All staff have access to, and are encouraged to complete, the module. Completion rates globally are currently relatively low. Completion of the module to be made mandatory for all staff globally has been agreed by Arup's global Ethics committee and formal approval is being sourced from Arup's Group Board.

As our policies and procedures around ensuring robust modern slavery measures are developed further then our training program will be amended and further developed to reflect this.

Arup has developed and published a podcast to further raise awareness of modern slavery and to inform of what is being done to mitigate the risk of modern slavery occurring within Arup's supply chain. While the number of views of the Newsroom article introducing the podcast is satisfactory, the number of views of the podcast are currently relatively low. Further communication of the availability of the podcast will be provided.

### **Modern slavery confidential reporting**

Arup has a confidential reporting program called Speak Up which is available for all staff and those who work with us to challenge unethical behaviours such as those related to modern slavery. The Speak Up Procedure has been developed to provide a safe and publicly available channel for anyone who works with us, or for us, to disclose any concerns they may have about the conduct of our business.

## Arup's key performance indicators (KPIs) and measures taken to address modern slavery

Arup has developed the following KPIs and measures including:

- Completion of a modern slavery risk workshop; the workshop was completed in December 2022, and risk mitigation actions generated from the workshop are being progressed to completion.
- Measuring rates for completion of the modern slavery learning module; please refer to the modern slavery awareness training section above.
- Monitoring access to the modern slavery learning podcast; please refer to the modern slavery awareness training section above.
- Monitoring actions and awareness of staff with direct responsibilities in this area; this will be an area of focus for the coming year.

## Next steps

Arup is committed to continual growth in this area and has a range of activities proposed for progression in the coming year:

- Development and publication of a modern slavery in construction supply chains guidance.
- Development and publication of a Sustainable Procurement Policy and a Supplier Code of Conduct that both contain information relating to Arup's modern slavery requirements.
- Further implementation of the Business Integrity (including modern slavery) due diligence component of the on-line supplier onboarding and management portal.
- Continued development of the modern slavery learning module; the module content will be reviewed prior to end of 2023.
- Further communication of the availability of the modern slavery learning module and modern slavery podcast.
- Consideration of providing access to Arup's on-line modern slavery learning module to nominated suppliers of goods and services to Arup.
- Continuing assessment of staff performance, and supply chain performance, in regard to commitments made in this Statement.
- On-going monitoring and measurement of the effectiveness of the actions detailed in this Statement, that Arup has implemented, and is implementing, to mitigate risk associated with modern slavery. This includes for example, review of our onboarding process, project audits, and supply chain feedback. It should be noted that to date no issues/concerns have been raised internally or externally relating to modern slavery.



Alan Belfield  
Chair  
Arup Group Limited