

## Modern Slavery and Human Trafficking Statement

### Introduction

This is the Modern Slavery and Human Trafficking Statement (“**Statement**”) of Arup Group Limited for the financial year ending 31 March 2024. This Statement is applicable to the subsidiaries of Arup Group Limited and may be supplemented by local addendums.

This Statement is signed by the Chair on behalf of the board of directors of Arup Group Limited. This Statement is aligned with Arup’s Modern Slavery and Human Trafficking Policy (“**Policy**”).

### 1. Arup’s Organisation Structure and Supply Chains

Arup Group Limited (“**AGL**”) is a company registered in England and Wales under company number 01312454. AGL is the ultimate parent of all Arup subsidiary entities (AGL and subsidiary entities are collectively referred to as “**Arup**” herein).

Arup is an independent firm of designers, engineers, architects, planners, consultants, and technical specialists with over 18,000 members of staff worldwide.

Arup includes entities incorporated and/or operating in the UK, providing professional design and engineering services predominately in relation sustainable development in the built environment.

In respect of Arup’s project work, Arup’s supply chain is predominately the engagement of professional sub-consultants for the provision of professional services.

In addition, Arup’s operations are supported by the procurement of goods and services such as office supplies, catering, drivers, cleaners, and security. Professional advisors, external lawyers and consultancy firms are also engaged to provide professional services such as tax and employment advice. Arup’s supply chain also includes the procurement of branded items and personal protective equipment.

### 2. Policies in relation to slavery and human trafficking

This Statement is aligned to Arup’s **Policy** which encapsulates Arup’s commitments and objectives in respect of slavery and human trafficking.

Arup’s Policy and this Statement have been developed to align 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.

AGL is a member of the UN Global Compact and the World Economic Forum Good Governance Forum. AGL is a signatory to the World Economic Forum Partnering Against Corruption Initiative.

Arup acts in accordance with a global governance framework that includes the Group Ethical Conduct Policy and the Business Integrity Code of Practice, both of which are available

externally on [www.arup.com](http://www.arup.com). It is Group practice to require supply chain partners to act in a manner that is consistent with Arup's policies, practices and expectations.

### 3. Due Diligence Processes

Arup's supply chain involves minimal procurement of tangible goods or equipment for use on projects. Supply chains for Arup's operations mainly involve contracting with corporate suppliers for the provision of office-related goods, equipment, services and products.

In maturing our due diligence processes and in advancement of our commitments, Arup's Business Integrity team have conducted business integrity due diligence on suppliers of office-related goods, equipment, services and products.

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 behaviors. 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).

### 4. Risk Assessment and Management

Due to the nature of Arup's project-related activities and professional consultancy services, the risk of breaches of modern slavery regulatory requirements within these parts of Arup's supply chain (professional sub-consultants) are deemed as low.

Arup has identified that suppliers of certain goods and services may present a higher 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.

As a measure to mitigate risk, where Arup engages sub-consultants, we seek to contract on Arup's standard terms. Arup's standard terms include obligations for the sub-consultant / supplier to comply with Arup policies and applicable legislation.

### 5. Key Performance Indicators (KPIs)

- Risk mitigation actions generated from completion of a modern slavery risk workshop are being progressed to completion.
- Training: Monitoring training completion rates.
- Engagement: Monitoring access levels to communications and resources.
- Due diligence: Arup is working towards automated business integrity due diligence of suppliers of goods and services via the implementation of a supplier on-boarding and management portal. It is intended that, through this portal, Arup's suppliers will be required to confirm their compliance to applicable regulatory requirements, including 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. The volume of due diligence screening will be monitored and the number and nature of any 'flags' will be reported to relevant

leadership and functions and addressed as appropriate by the business integrity and procurement teams.

- Reporting: Our Speak-Up Procedure enables concerns regarding unethical behaviour or improper conduct, including those related to modern slavery, to be disclosed confidentially, and where the disclosure selects, anonymously. The volume and nature of disclosures are monitored so that trends can be identified. Metrics are reported to global leadership at least quarterly.
- Guidance on ‘Modern Slavery in Construction Supply Chains’ is under development. The guidance will be launched as part of the suite of resources made available to Arup’s members in relation to modern slavery. Engagement levels will be monitored.
- A comprehensive Supplier Code of Conduct, which reinforces Arup’s commitments and expectations regarding modern slavery and trafficking, is planned to be launched within the 2024/25 FY.

## 6. Training

A modern slavery e-learning module (“**MS module**”) has been developed and is encouraged for all Arup members.

Completion of Arup’s Ethics learning is mandatory for permanent and temporary members (including contract and agency staff), statutory directors and officers and trustees. To further our commitments in respect of slavery and human trafficking, core aspects of the MS module are being incorporated into the mandatory Ethics learning thereby making modern slavery learning mandatory for all Arup members (including contract and agency staff, statutory directors and officers and trustees) globally.

In addition to mandatory training and e-learning, communications and resources regarding slavery and human trafficking are curated and maintained to support our members.



Jerome Frost  
Chair  
Arup Group Limited  
September 2024