

Modern Slavery and Human Trafficking Statement

Introduction

Arup is an independent firm of designers, engineers, architects, planners, consultants, and technical specialists with over 17,000 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 ('Arup') for the financial year ending 31 March 2022.

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

Modern slavery consultation process

Arup Group Limited is the ultimate parent of the wider Arup Group of companies. Arup Group Limited sets and approves an overarching modern slavery statement ('the Statement') for the Group 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 Limited Ethics Committee and is then formally approved by the board of directors of Arup Group Limited. 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 the ultimate parent of the wider Arup Group of companies. Arup Group Limited is a company registered in England and Wales under company number 01312454. Arup Group Limited sets the governance framework for its group of companies (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 to look after our people and ensure their health, safety and wellbeing.

These various components of Arup's 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.

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, including clients, partners and collaborators including sub-consultants and other suppliers of services and goods to seek to ensure that modern slavery does not feature in our supply chain. During 2021 Arup published 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 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 will continue, over time, to be applied to suppliers of services and goods to all Arup-offices.

Automated due diligence will increasingly be utilised to screen suppliers of goods and services. This is being achieved via the implementation of a supplier on-boarding and management portal (the supplier portal). Arup's suppliers will be 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

An on-line modern slavery learning module ('the Module') has been developed and was published in May 2022.

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 will have access to, and be encouraged to complete, the Module. Logistics to make this course mandatory for all staff are to be confirmed but currently Arup staff involved in office support activities and staff in procurement-related roles will be requested to complete the Module.

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

Arup is also developing 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.

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

Arup has yet to develop formal management metrics for the area of KPIs but will be looking to introduce measures such as:

- Measuring attendance and completion of a Modern Slavery risk workshop;
- Measuring rates for completion of the Modern Slavery learning Module;
- Monitoring access to the Modern Slavery learning podcast;
- Monitoring actions and awareness of staff with direct responsibilities in this area.

Modern slavery confidential reporting

Arup has introduced a confidential reporting program called Speak Up which is available for all staff to make their concerns heard. This encourages and supports 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.

Next steps

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

- Implementation of the Business Integrity (including modern slavery) due diligence component of the on-line supplier onboarding and management portal;
- Scheduling of a Modern Slavery risk workshop;
- Continued development of the Modern Slavery learning Module;
- Development and publication of a modern slavery podcast;
- Developing mechanisms to measure attendance and completion of the above, as relevant;
- Continuing assessment of staff performance, and supply chain performance, in this area.



Alan Belfield
Chair
Arup Group Limited