

# ERM Modern Slavery Statement 2020

*Note: This Statement is made pursuant to section 54(j) of the UK Modern Slavery Act 2015 and constitutes the Modern Slavery Statement 2020 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 fifth Modern Slavery Statement and should be read in conjunction with our [previous Statements](#) and our [Slavery, Child Labour and Human Trafficking Policy](#). This statement and all past statements can be accessed via a link on our public website, [erm.com](#). 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 2020 and note plans for the next fiscal year.

## 1.0 Summary of Actions taken during fiscal year ending 31 March, 2020

We progressed our Supplier Code as referenced in last year's statement, but did not complete the rollout across our supply chain by 31 March 2020. Due to the subsequent operational impacts of Covid-19 our rollout has been further delayed, but as at the date of this statement is planned to be completed by December 2020.

During the year, we took other specific actions to progress our efforts against Modern Slavery, as follows:

- Improved our due diligence process by linking automatic first level anti-money laundering, trade sanction and compliance screening to our project opportunity database. Our improvements allow screening information to flow to project teams at the earliest discussion of a project. Since international sanctions are the primary way to shut down money laundering from modern slavery, our system improvements not only improve our commercial agility but also support our ethical commitments in business relationships.
- Implemented a broad based training programme for our personnel regarding safe and ethical management of subcontractors, especially designed for high risk activities and jurisdictions;
- Developed and piloted new training for our project managers (as they are "front line" for spotting and reporting concerns), plus we set in motion an aggressive plan to launch this new training across the global business; and
- In addition to our work for clients to support their efforts against modern slavery, ERM also participated in a number of external engagements and strategic international partnerships related to modern slavery in the last year, including with the UN Global Compact Working Group and WBCSD. For example, our CEO Keryn James was one of the 35 forward-thinking top executives of WBCSD member companies who signed and promoted the WBCSD CEO Guide on Human Rights and Business in 2019.

## 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 2020](#).

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 supporting 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 – see [ERM Sustainability Report 2020](#).

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).

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. By way of example, we invest in women-led agricultural cooperatives and fund training and support for women-owned clean water businesses. For more information, see our ERM

Foundation Annual review at [ERM Foundation 2020 Annual Review](#).

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. We focused our training efforts on subcontractor management in general and project managers in particular.

In FY19, we designed a refreshed training program for subcontractor management and for project management, and during early FY20, we piloted and commenced the delivery of this training. During FY20, of the average target cohort of approximately 1,400 employees, we trained over 600 people (over 40% attendance). As at the date of this statement, we are progressing toward our target to train the remainder of the target cohort.

### 3.0 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 2020 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.

### 4.0 Our Next Steps for the fiscal year ending 31 March 2021

We will provide details on progress made and our performance in next year's Statement. Until that time, we intend to complete the roll out of our Supplier Code 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 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: 29 September 2020 for the financial year 2020 (1 April 2019 to 31 March 2020) for ERM Worldwide Group Ltd and its global subsidiaries***