

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Policy statement

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. The Company has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015. The Company also expects the same high standards from its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery and expects that its suppliers will in turn hold their own suppliers to the same standards.

This policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.

Compliance

As a member of the Arcadis group of companies, CallisonRTKL-UK Ltd carries out its business activities in compliance with the Arcadis General Business Principles ("AGBP"). The AGBP confirms that "Our people are the key to our success, and we respect their human and labor rights so that they may work in a safe, healthy, professional, and supportive environment."

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your HR Business Partner or one of our Compliance Officers. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your HR Business Partner or one of our Compliance Officers. You can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to making sure that no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

Our Supply Chain

Our supply chain comprises sub-consultants, contingent workers agencies and suppliers who provide professional services to us, and suppliers who provide goods and/or services to us in the support of our business.

We take the following steps to prevent modern slavery or human trafficking from occurring within our supply chain:

1. All new sub-consultants, contingent workers, agencies and suppliers must be approved through our pre-qualification process in order to be registered on our system and paid. The pre-qualification process specifically asks questions around compliance with modern slavery legislation.
2. Our standard contractual terms with third parties confirm that they carry out their business in accordance with principles consistent with the AGBP and with reference to the Modern Slavery Act where appropriate.

Right to Work Checks and Due Diligence Processes

Our HR processes comply with all applicable UK legislation.

Right to work checks as a minimum are carried out on all new CallisonRTKL UK employees. An individual's employment with us is conditional upon having the legal right to work in the UK.

Training for Staff

Training on compliance and anti-corruption is a mandatory part of the induction process for all new employees. All staff are required to undertake online refresher training every 2 years.

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

Risk Assessment

We have built a step into our Anti-Bribery and Corruption Risk Assessment in order to routinely assess our approach to the risk of modern slavery within our business.

Due to the professional nature of our business' work, we believe the risks associated with slavery and human trafficking within our business are objectively considered to be low.

However, we acknowledge that our key risks are:

1. Our supply chain;

We manage these risks through the procedures referred to above.

Breach of the policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

Measuring Effectiveness

We maintain a telephone and web-based Integrity Line through which integrity issues can be reported anonymously. Contact details are available to all staff. All issues reported through the Integrity Line are followed up by the Arcadis compliance committee as appropriate.

There have been no issues raised internally or externally relating to modern slavery.

We continue to monitor our third parties' compliance with our processes.
This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Approved by Kelly Farrell, President and CEO, CallisonRTKL

Date: November 2019