

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 2025. In accordance with section 54, part 6 of the Modern Slavery Act 2015, this Statement is submitted on behalf of Arup Group Limited and its subsidiaries and may be supplemented by local addendums.

This Statement is signed by the Chief Executive Officer on behalf of the board of directors of Arup Group Limited. This Statement is aligned with Arup’s Modern Slavery and Human Trafficking Policy

Our Values in Action

At Arup, *straight and honourable dealings* are more than a tradition - they are the foundation of our culture. We commit to acting honestly, openly and fairly in every relationship, guided by the standards set out in Ethical Conduct Policy and the Business Integrity Code of Practice. These principles shape how we work with colleagues, clients, suppliers and the communities we serve, wherever in the world we operate.

Respect for People, Zero Tolerance for Exploitation

It is our pledge to treat people with dignity and respect and to maintain ethical business standards in all markets. We therefore have zero tolerance for modern slavery, human trafficking, forced or child labour in any part of our business or supply chain.

Embedding the Commitment

- Every employee, officer and third-party representative is required to understand and uphold these expectations, reinforced through mandatory training and robust due-diligence processes.
- We collaborate only with partners whose own conduct aligns with our Ethical Conduct Policy and Business Integrity Code of Practice; any breach can lead to suspension or termination of the relationship.
- Concerns can be raised in confidence - and without fear of retaliation - via our global *Speak Up* channels, ensuring issues are addressed swiftly and transparently.

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 to 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 are also engaged to provide professional services such as tax and employment advice, external lawyers and consultancy firms. Arup's supply chain also includes the procurement of branded items and personal protective equipment (PPE).

2. Policies in relation to slavery and human trafficking

Arup maintains a strict zero-tolerance stance toward any breaches of the UK's anti-trafficking and modern-slavery legislation. Should a violation be identified in our supply chain, we will work constructively with the relevant company to help it meet the required legal standards.

This Statement is aligned to Arup documents (collectively referred to hereafter as the "Policies"):

- Arup Ethical Conduct Policy
- Business Integrity Code of Practice
- Arup's Modern Slavery and Human Trafficking Policy
- Global Supplier Code of Conduct

Arup's Policies 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. 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, PPE 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, we assess the suppliers and sub-consultants that we deal with as part of the decision-making process. When we admit a new supplier and or subconsultant, a thorough due diligence process takes place to ensure that the supplier and or sub-consultant have a good reputation with good practices in a number of areas including people and culture. We aim to contract under Arup's standard terms, which expressly require every sub-consultant and supplier to follow our policies and all relevant laws.

5. Key Performance Indicators (KPIs)

Arup assesses the effectiveness of its modern slavery risk mitigations through the following KPIs:

- **Risk mitigation** actions generated from the completion of a modern slavery risk workshop are being progressed to completion.
- **Training:** Monitoring training completion rates.
- **Engagement and Consultation:** Monitoring access levels to communications and resources, ensuring widespread awareness of modern slavery initiatives and incorporating consultation with relevant stakeholders and our clients to strengthen alignment and shared responsibility.
- **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 with 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 with 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 be relevant leadership and functions and addressed as appropriate by the business integrity and procurement teams.
- **Reporting:** Our Speak-Up Procedure enables concerns regarding unethical behavior 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 and to date there have been no instances of modern slavery reported. Metrics are reported to global leadership. Existing regional Speak-Up platforms will be consolidated into one global system with a plan to launch during the 2025/2026 FY.
- **Guidance on 'Modern Slavery in Construction materials in Supply Chains'** was launched last March 2024.
- A comprehensive **Supplier Code of Conduct**, that reinforces Arup's commitments and expectations regarding modern slavery and trafficking was launched in March 2025 and is now available externally on www.arup.com.

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 embedded within 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
Chief Executive Officer
Arup Group Limited
July 2025

This Statement will be published on the homepage of www.arup.com and has been uploaded to the UK Government Modern Slavery Statement Registry in accordance with section 54 of the Modern Slavery Act 2015.