



Slavery and human trafficking

Purpose

This policy covers our approach and commitments to modern slavery, which covers any form of servitude, forced or compulsory labor, child labor, and human trafficking. This issue affects virtually every country in the world and is a violation of basic human rights.

Commitment

The Group has a zero-tolerance approach to all forms of modern slavery and is committed to acting ethically and with integrity in all its activities, wherever we are working.

We are committed to achieving transparency in our approach to tackling modern slavery in our supply chains, in accordance with our obligations under legislation such as the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018, and the USA Trafficking Victims Protection Act: 22 U.S.C. § 7101.

We are committed to paying at least the local national living wage where this exists to our employees and expect our contractors, suppliers, and business partners to do the same.

Responsibility

We have implemented and enforce measures and controls to ensure modern slavery is not taking place within or related to our business. This is reflected in Our Code, where we set out the standard of behavior expected from our colleagues and supply chain.

An Executive Board director is responsible for the effective implementation and maintenance of the policy.

The Group business management systems director is responsible for implementing this policy, monitoring its use and effectiveness, and for auditing the control systems embedded in our business management systems.

General managers ensure we meet our obligations on a day-to-day basis and are responsible for monitoring and implementing this policy.

Approach

We seek to have a culture of mutual respect among all the Mott MacDonald community, with equal opportunities promoting fair employment, considering local culture and laws.

In doing so we:

- Only work with clients around the world who share our commitment to meeting the principles of national legislation and associated International Labor Organization (ILO) regulations and best practice.
- Require our contractors, suppliers, and business partners to have standards and policies that govern their business and meet their obligations under the national legislation and associated ILO regulations.
- Undertake appropriate due diligence in evaluating contractors, suppliers, agencies, and business partners before formalizing relationships with them.
- Assess our projects to identify and act on risks associated with modern slavery.
- Provide training to help employees understand the risks associated with modern slavery and human trafficking and how one can identify people working under these conditions.

Our arrangements with contractors, suppliers, and business partners allow us to withdraw from contracts if breaches of their commitments or unethical business practices become apparent.

Employees, contractors, suppliers, and business partners are encouraged to raise concerns without fear of reprisal. Employees may do this either through line managers or by using “Speak Up,” our confidential and independent reporting service.

A handwritten signature in blue ink, appearing to read 'M. C. Isola'.

Michael C. Isola
President and CEO
Mott MacDonald North America