

Slavery and human trafficking statement 2024

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. For the purpose of this statement, we consider Mott MacDonald Group with the exception of JN Bentley Limited, our construction business, which produces a separate statement. In describing our actions, we aim to follow the UK Government guidance 'Transparency in supply chains'.

Mott MacDonald's structure, business and supply chain

Mott MacDonald is a global engineering, management and development consultancy headquartered in the United Kingdom.

We operate globally with one set of policies, directives and requirements through a common business management system. Through this approach, all our colleagues in the Mott MacDonald Group, wherever they are based, are required to comply with relevant legislation.

Our people: Our 20,000 staff are mainly directly employed, typically have tertiary education, and are often members of professional organisations. Our agency supplied labour is generally for skilled or professional roles. We comply with employment laws in the jurisdictions in which we operate and follow a robust recruitment process.

Our supply chain: Mott MacDonald Group is supported by approximately 10,000 suppliers. The major categories of spending include consultancy, professional and IT services, and equipment for our premises and people.

Our policies

Our Purpose is to improve society by considering social outcomes in everything we do; relentlessly focusing on excellence and digital innovation, transforming our clients' businesses, our communities and employee opportunities. Our code of conduct, [Our Code](#), sets out our standards and expectations for all colleagues and those we work with, and advances our PRIDE values – Progress, Respect, Integrity, Drive, and Excellence. With respect to slavery and human trafficking Our Code states:

"We reject modern slavery in all its forms, including servitude, forced or compulsory labour and human trafficking. This includes providing a fair living wage for all our staff. We follow local legislation and regulation wherever we work. However, where Our Code provides the higher standard, we expect that to apply."

Our global commitments, responsibilities and approaches are outlined in [our policies](#). These are reviewed annually and signed off by the Executive Board. Each policy has a designated Executive Board director, responsible for ensuring its implementation and continuous improvement. The key policies related to slavery and human trafficking are:

- Human rights and modern slavery policy,
- Equality, diversity and inclusion policy,
- Business integrity policy,
- People policy,
- Risk management policy,
- Supply chain policy,
- Safeguarding policy,
- Social responsibility and social value policy.

We have whistleblowing mechanisms in place, with a Speak Up helpline, as fully described in Our Code.

Due diligence

Due diligence is our first line of defence in mitigating potential risks when working with third parties, including clients and suppliers.

We recognise our responsibilities to work with suppliers that respect International Labour Organisation conventions and ensure that they share our values and operate in a manner consistent with Our Code, in their dealings with us and within their own supply chains. Our approach is informed by the United Nations Global Compact and the Guiding Principles on Business and Human Rights.

We carry out due diligence checks on clients, suppliers and partners. We evaluate third parties using a standard questionnaire to identify competence, compliance with our values, policies and standards and to understand how they are addressing slavery and human trafficking risks. Due diligence relating to clients and suppliers is undertaken through a third-party risk management solution, our previous experience of working with the organisation, and our local knowledge.

Following appointment, for key and critical suppliers review meetings take place to monitor performance against agreed metrics and identify any development or improvement opportunities, including in relation to modern slavery. Through these meetings, we communicate our expectations, monitor

performance and address any issues in accordance with Our Code.

Suppliers are required to adhere to the modern slavery aspects included in our standard supplier and joint venture contracts.

Risk management

Risk Overview: The risks associated with slavery and human trafficking in our operations are generally low. Our work to assess slavery and human trafficking risks within our supply chains has been focused primarily on our Tier 1 suppliers.

Our modern slavery risks are broadly divided into the following categories of supply chains:

- Facilities Management (FM) staff (cleaning, janitorial, security, etc.) in our 140 offices across the world.
- Organisations providing resources or services to support the delivery of our business, such as suppliers of personal protective equipment (PPE), office supplies, catering organisations, accommodation and travel companies.
- Office equipment manufacturers, such as furniture and laptops.

The above groups can be further subdivided into labour that is:

- Directly employed (where a company in the Mott MacDonald Group is the contracting party).
- Sub-contracted, where we employ a service agency who is the contracting party.
- Associated labour, whereby our joint venture (JV) partners are the contracting party, or they sub-contract to agencies to provide labour.

The highest risks for Mott MacDonald Group are in relation to:

- Outsourced low wage jobs, such as office cleaners, drivers and support staff.
- Our commodity purchasing supply chain, eg personal protective equipment, IT equipment, office furniture, tea and coffee, where unskilled labour is prevalent.
- The construction related supply chains of our partners and clients around the world.
- Working with JVs and sub-contractors.
- Staff untrained in recognising the signs of modern slavery.
- Failure to report and investigate suspected modern slavery issues.

Our people: We deem the risk of modern slavery or human trafficking occurring within Mott MacDonald's direct employee population to be low. Nevertheless, we take steps to help ensure our business and employees are protected from modern slavery or human trafficking risks.

We employ individuals through a transparent recruitment process, whether they are employees or contract staff. This seeks to confirm individuals share our corporate values, have a right to be employed for a specific job, are not breaching immigration regulations; have the necessary competence and aptitude for the position and are applying to work for us through their own free will.

Our Conditions of Employment set out the general terms and conditions of employment applicable to personnel who are recruited by a Group company or branch office. We operate in accordance with local laws and regulations relating to working conditions. We are also committed to having fair employment policies in accordance with local standards and cultures.

Our supply chain: We seek to ensure that our purchasing practices do not create pressure on our suppliers that could lead to modern slavery, for example, by avoiding aggressive pricing that does not consider production costs, late payments or imposing unfair penalties.

Our risks related to modern slavery vary between the countries and sectors we work in. We use a suite of modern slavery country risk assessments, which enables the business to assess the level of likelihood and severity of modern slavery risks, using the Global Slavery Index alongside factors such as the sector and region.

We have produced guidance for our project managers and office managers to help them identify key areas of risk and to implement appropriate control measures to mitigate them.

Training and awareness on slavery and human trafficking available to our staff

Our staff are trained in, Our Code, ethics and compliance, and the Group Business Integrity policy, confirming that they will comply with the respective provisions.

We have developed an awareness module for modern slavery, which is available to all staff, and is designed to develop the understanding of what modern slavery is, who is affected, and how to spot the signs.

Our Code is available to our suppliers and on our external website to highlight our value, standards and expectations, including on modern slavery

and human rights, and how to raise concerns related to this. We include modern slavery training material in the mandatory learning that all staff who work outside the office are required to complete.

We make use of dilemmas to help staff understand some of the issues they might encounter. These scenario-based discussions help staff think through what they might do in a specific situation.

Effectiveness of our processes, including our key performance indicators

We undertake internal audits to verify compliance with our own business processes and are externally verified by third party organisations for compliance with ISO standards where relevant.

Since 2022 we have been partnering with the international social enterprise Slave-Free Alliance to support us in our approach and action plan to mitigate the risk of modern slavery.

Our programme of work is informed by the gap analysis conducted by the Slave Free Alliance in 2023. In FY23 we have focused on strengthening the modern slavery element of our due diligence questionnaire and supplier performance assessments.

We have set metrics to evaluate the effectiveness of our approach to tackling modern slavery. We continue to monitor our performance, as well the need for additional metrics, to drive improvements across our operations and supply chain. For

example, over the course of 2023 we did not receive any reports (internal or via Speak Up) related to modern slavery or human trafficking. To ensure that low numbers of reports are not due to lack of awareness of Speak Up or modern slavery, we continue to promote our reporting mechanisms, both as part of Our Code and wider communications to the business, and review our training programme.

Key Performance indicators	FY23
Our Code training completion rate (%)	98%
Speak Up reports related to modern slavery or human trafficking (#)	None

This statement was approved by the Executive Board of Mott MacDonald.

Cathy Travers
 Group Managing Director

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