

# ANTI-HUMAN TRAFFICKING/ MODERN SLAVERY POLICY



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# ABOUT THIS POLICY

It continues to be a priority for Moffatt & Nichol Ltd and the Moffatt & Nichol group (collectively the “Company”) to ensure that we trade ethically, source responsibly and are committed to improving our practices to combat slavery and human trafficking throughout our organisation and our supply chain. We understand the obligations imposed by the Modern Slavery Act 2015 in the United Kingdom and elsewhere, which is why we are committed to establishing a work environment free of discrimination, harassment, intimidation or coercion during all phases of employment. The Company has a zero-tolerance policy regarding the use of forced labour, human trafficking, and child labour.

## OUR STRUCTURE

Moffatt & Nichol Ltd is a global infrastructure advisory firm providing engineering and consulting services to clients in the marine terminal, transportation, energy, environmental, federal and urban development markets all around the world.

Moffatt & Nichol Ltd is a subsidiary company to its parent company, Moffatt & Nichol, which is incorporated in California in the United States. We currently have over 1,200 employees worldwide and operate in over 40 countries.



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# 1.0 PROCEDURES IN PLACE TO PREVENT MODERN SLAVERY

Our Modern Slavery Policy is supplemental to our Code of Business Conduct and Ethics, both of which reflect our commitment to acting ethically and with integrity in all of our business relationships, and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.

The nature of our business model and undertaking means that our business and supply chain is manageable in terms of controlling the risks of slavery. Nonetheless, we have given thought to the risks of modern slavery in all operations and supply chains. Our supply chains include but are not limited to:

- Subconsultants
- Contractors
- Vendors
- Goods (office supplies, store items, food etc.)
- Services (Janitorial, office-related maintenance items etc.)

Upon analysing our business structure we wish to emphasize areas that can highlight some of the risks involved. These include, but are not limited to:

## 1.1 ENVIRONMENTAL RISKS

The Company is a global infrastructure firm, and consequently we operate in countries all over the world. Naturally, some of the countries in which we operate have higher risks of modern slavery, which we take into consideration.

## 1.2 PRODUCTS AND SERVICES

Within some of the countries in which we operate, a few products and services used within our supply chain could be deemed to be of higher risk. These services can include foreign migrant workers and manual labour.

The Company has worked hard to establish frontline defenses against modern slavery and human trafficking, and we present them below for your information:

- The Company has established a line of action to identify and abolish slavery from within our business and supply chain. We have a robust Code of Business Conduct and Ethics which cements these strategies. The policies within the structure are supported by our human resources, legal, audit and compliance, and health and safety teams.



- The Company has a long reputation and culture for honesty and integrity in business dealings and lawful and ethical behaviour. Within our Code of Business Conduct and Ethics, we have in place a stringent anonymous reporting procedure, which could include any issues surrounding modern slavery. The Company acknowledges any issues that may arise with the highest of importance, and each issue is dealt with in a dignified and prompt manner.
- The Company has in place a comprehensive package of training resources available, which are to be completed by employees at intervals throughout the working year. These training programs are heavily based on how employees are expected to behave within our business. In addition, the Company is fully committed to further improving and exploring our modern slavery training as a part of an ongoing process.
- The Company strives to have a transparent working relationship with everyone with whom we work, including professionals within our supply chains. We have evaluated and continue to monitor and evaluate our risks when working with our suppliers.



# 2.0 OUR COMMITMENT

The Company continues to take the appropriate steps and is committed to improving and adapting any provisions needed to ensure slavery does not occur within its business or supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the financial year ending 31 December 2024.



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