

Modern Slavery and Human Trafficking Statement

In accordance with our Group Policy on Ethical Conduct, we will treat people respectfully and maintain ethical business standards in all the markets in which we operate.

Arup is an independent firm of designers, engineers, architects, planners, consultants and technical specialists with over 16,000 members of staff worldwide. We believe the risk of slavery and human trafficking in our business is low.

Implementation

Specifically, with regard to Modern Slavery and Human Trafficking legislation, during the relevant financial year, our policies and procedures were reviewed and updated where required.

We align our work and our business with the UN Sustainable Development Goals (SDGs), including SDG 8.7, which seeks to end Modern Slavery and Human Trafficking.

Where Arup engages sub-consultants, and suppliers of services and equipment to our offices, we seek to agree contractual terms which require compliance with Modern Slavery and Human Trafficking legislation.

We have published a Business Integrity Code of Practice. This includes required actions to minimise the risk of Modern Slavery in our business.

We have implemented due diligence screening of our supply chain.

We continue to develop training for Arup staff involved in the selection and appointment of sub-consultants and suppliers.

Governance

This is the modern slavery and human trafficking statement of Arup Group Limited and its subsidiaries ('Arup') for the financial year ending 31 March 2021.

This statement was approved by the boards of directors of Arup Australia Pty Ltd and Arup Pty Ltd on 28 September 2021 and by the board of directors of Arup Australia Services Pty Ltd on 29 September 2021.



Murray Kretschmer
Director

Addendum

Supporting Information

Please note that where ‘modern slavery’ is referred to below it can be inferred that human trafficking is included within such references.

Structure, operations, and supply chains

Arup Australia Pty Ltd and Arup Pty Ltd are the entities which contract with clients to provide integrated consultancy services in engineering and related disciplines, focussed on sustainability and the built environment. As these entities’ primary purpose is to provide consultancy services and advice to clients, the supply chain involves minimal procurement of tangible goods or equipment for usage on projects. The supply chain does involve procurement of sub-consultants and intangible assets such as computer software or licences, subject to the same due diligence process.

Arup Australia Services Pty Ltd is the entity which houses our people who work on these projects. Its supply chain mainly involves contracting with corporate suppliers regarding the procurement of office related goods, equipment and services in order to look after our people and ensure their health, safety and wellbeing.

All three companies are related bodies corporate under the definition given in Section 50 Corporations Act 2001 (Cth). Their ultimate parent company is Arup Group Limited, a company registered in England and Wales under company number 1312454. Arup Group Limited sets the governance framework for its group of companies and each region is responsible for the implementation of that framework.

The boards of directors of all three entities have formally delegated authority to a Management Team consisting of senior leaders to run the day-to-day operations of the business, including procurement and management of supply chains. The Management Team report back to the boards of directors on a quarterly basis regarding their activities. As part of our risk management framework, there is a dedicated Business Integrity Team who regularly review and monitor supply chains and operations and provide reports to senior leadership. Any areas of concern identified

are then escalated to the Management Team and up to the boards of directors if required.

Modern slavery risks in Arup’s supply chains and operations

Arup has identified (in relation to Arup Australia Services Pty Ltd) that suppliers of goods and services for Arup offices present a risk of breaches of modern slavery regulatory requirements. Suppliers of at-risk goods include Arup-branded clothing, personal protective equipment and various office-related equipment and furniture. Other suppliers of at-risk services relating to Arup offices include cleaning, security, and maintenance activities.

Due to the scope of Arup’s project-related activities (in relation to Arup Australia Pty Ltd and Arup Pty Ltd) i.e. predominantly engineering design consultancy services, the risk of breaches of modern slavery regulatory requirements within these parts of Arup’s supply chain has been assessed as low.

Modern slavery risk mitigation actions

Arup’s Business Integrity Code of Practice (‘the Code of Practice’) confirms that Arup will work with its supply chain, including clients, partners and collaborators including sub-consultants and other suppliers of services and goods to seek to ensure that modern slavery does not feature in our supply chain. During 2021 Arup published an external-facing version of the Code of Practice, applicable to all external parties we engage with.

Suppliers of goods and services to Arup’s Australian offices have been the subject of due diligence screening during the financial year, including in relation to modern slavery. This screening has indicated that two suppliers have previously been the subject of adverse media relating to alleged underpayments to employees / contractors. Further due diligence is being applied to these two suppliers. Periodic due diligence screening will continue to be applied to suppliers of services and goods to Arup’s Australian offices.

A combination of automated and manual due diligence screening, including for modern slavery issues, is applied to Arup’s clients.

ARUP

A supplier on-boarding tool ('the Tool'), that includes a focus on modern slavery, was purchased by Arup in mid-2021, and while initially being implemented in Arup's UK operations, the Tool will be adopted for Arup's Australian operations during 2022-23.

An on-line modern slavery learning module ('the Module') is currently being developed, with publication date to be by end December 2021. While requirements for mandatory completion of the Module are to be confirmed, Arup staff involved in office support activities and staff in procurement-related roles will be required to complete the module. Regardless, all staff will have access to, and be encouraged to complete, the Module.

Modern slavery consultation process

The three Australian reporting entities are part of the wider Arup Group of companies ('the Group') with Arup Group Limited being the ultimate parent. Arup Group Limited sets and approves an overarching modern slavery statement ('the Statement') for the Group each financial year. The Statement is reviewed and updated each year by the Business Integrity Leader, the Arup Group General Counsel and the Arup Group Limited Ethics Committee and is then formally approved by the board of directors of Arup Group Limited. The Statement is communicated down to, and formally adopted by, the boards of directors of every operating subsidiary within the Group, including the three Australian reporting entities. As the Modern Slavery Act 2015 (UK) is not as prescriptive as the Modern Slavery Act 2018 ('the Australian Act'), this addendum is being provided in addition to the Group Statement to address the mandatory reporting criteria under Section 16 of the Australian Act.