ARUP

# Modern Slavery and Human Trafficking Statement

# Our Modern Slavery and Human Trafficking Statement 2026

## Message from the CEO

At Arup, respect for people and responsible business conduct are fundamental to how we operate. Modern slavery, human trafficking, forced labour and child labour are serious violations of human dignity, and we are committed to ensuring they have no place in our business or supply chains.

Our approach is grounded in our values and supported by clear governance, policies, training and reporting mechanisms. During the year, we continued to strengthen our framework through the establishment of our Ethics & Compliance function, the implementation of our Supplier Code of Conduct and the consolidation of Speak Up reporting into a single global system to improve accessibility, consistency and oversight.

As a professional services firm with a complex global supply chain, we recognise that modern slavery risk can arise in different ways, including through the goods and services that support our operations. We apply proportionate, risk-based due diligence and set clear expectations for suppliers and partners to act in line with our standards.

No instances of modern slavery were identified during the reporting period. However, we remain vigilant and are committed to continuous improvement in how we identify, assess and address modern slavery risks. If our people or partners see something that is wrong, or that may indicate a risk of modern slavery, we encourage them to raise concerns in good faith through our Speak Up channels. Those concerns will be treated seriously and without retaliation.

Jerome Frost
Chief Executive Officer
Arup Group Limited

# Introduction

This Modern Slavery and Human Trafficking Statement ("Statement") is made by Arup Group Limited for the financial year ending 31 March 2026 and sets out the steps taken during the 2025–2026 financial year to manage the risk of modern slavery within Arup's operations and supply chains. The Statement is made in accordance with section 54 of the Modern Slavery Act 2015 on behalf of Arup Group Limited and its subsidiaries (see Appendix A) and may be supplemented by local addenda where appropriate.

Approved by the Board of Arup Group Limited and signed by the Chief Executive Officer, this Statement should be read alongside Arup's Modern Slavery and Human Trafficking Policy and related governance documents that support its implementation.

## Our Values in Action

At Arup, *straight and honourable dealings* are more than a tradition, they are the foundation of our culture. We expect all members, suppliers and business partners to act with integrity and in line with the standards set out in Arup's Ethical Conduct Policy and Business Integrity Code of Practice. These principles underpin our approach to identifying and addressing modern slavery risks across our business and supply chains.

## Respect for People

We believe that everyone should be treated with dignity, respect and fairness. Modern slavery, human trafficking, forced labour and child labour are serious abuses of human rights. We are therefore committed to working to prevent these practices within our operations and supply chains.

## Embedding the Commitment

- Our expectations apply to all employees, officers and third-party representatives, and are supported by mandatory training and proportionate due diligence.
- We seek to work only with suppliers and partners whose conduct is consistent with Arup's standards, and we may suspend or terminate relationships where those standards are not met.
- Concerns can be raised confidentially through Arup's global Speak Up channels, enabling issues to be reported and addressed appropriately.

## Arup’s Organisation Structure and Supply Chains

Arup Group Limited is a company registered in England and Wales under company number 01312454 and is the ultimate parent company of Arup’s subsidiary entities (together, “Arup”).

| 18,000 | 35+ | 100+ |
|---|---|---|
| **People** | **Countries** | **Offices worldwide** |

Arup is an independent firm of designers, engineers, architects, planners, consultants and technical specialists, employing more than 18,000 people worldwide. Arup operates globally through entities that provide professional design, engineering and advisory services, primarily in support of sustainable development in the built environment.

For project delivery, Arup’s supply chain primarily comprises sub-consultants engaged in providing professional services. Arup’s operations are also supported by the procurement of goods and services such as office supplies, catering, transport, cleaning, security and maintenance. Arup also engages professional advisers, including legal, tax, employment and consulting providers, where required, and procures items such as Arup-branded goods and personal protective equipment.

Responsibility for the effective management of modern slavery risk sits at both Board and Executive levels, with regular oversight provided through Arup’s governance structures. The Arup Group Limited Board sets Arup’s Modern Slavery and Human Trafficking Policy. The Executive Board, appointed by the Arup Group Limited Board, is responsible for implementing the Policy across Arup’s operations through relevant policies, procedures, management systems and learning.

Operational oversight is maintained by Arup’s Ethics & Compliance function, which supports the implementation of policies, procedures and controls relating to modern slavery risk across the organisation. The Policy is reviewed and approved annually, or more frequently where appropriate.

# Policies in relation to slavery and human trafficking

Arup's approach to modern slavery and human trafficking is supported by a structured policy governance framework. Key policies are approved, periodically reviewed and updated, and communicated through internal platforms, mandatory training and targeted communications to support awareness and understanding across the organisation.

These policies reinforce Arup's commitment to working to prevent modern slavery, human trafficking, forced labour and child labour within our operations and supply chains. They set expectations for ethical conduct, responsible purchasing, fair working conditions, human rights protections and the reporting of concerns. Where concerns are identified within our supply chain, we seek to address them promptly and appropriately, including by working with the relevant third party to support compliance with applicable legal and ethical standards.

Responsible purchasing principles are incorporated into Arup's procurement processes. These include expectations relating to fair working conditions and broader human rights protections, as reflected in the Supplier Code of Conduct. We expect suppliers and business partners to act in a manner consistent with Arup's policies, practices and standards.

Key policies and procedures relating to Arup's approach to mitigating the risk of human rights abuses and modern slavery include:

- Ethical Conduct Policy – sets expectations for ethical behaviour for all members.
- Business Integrity Code of Practice – defines standards for responsible business conduct.
- Modern Slavery and Human Trafficking Policy – outlines Arup's approach to identifying, assessing and mitigating modern slavery risks.
- Supplier Code of Conduct – sets expectations for suppliers on ethical conduct, responsible business practices, fair working conditions and respect for human rights.
- Speak Up Procedure – enables members, suppliers and business partners to raise concerns relating to human rights and modern slavery through established Speak Up channels.
- Grievance Procedure – provides a formal mechanism to address concerns raised by members.

Arup's policies and this Statement support the objectives of the United Nations Sustainable Development Goals, including Goal 5, Goal 8 and Goal 16, each of which is relevant to the prevention of modern slavery and human trafficking. Arup's Group Ethical Conduct Policy and Business Integrity Code of Practice are available externally on Arup's website.

## Risk Assessment and Management

During the reporting period, modern slavery considerations continued to be embedded within Arup's broader enterprise risk management framework. Arup uses a range of sources to identify, assess and monitor potential modern slavery risks, including supplier onboarding processes, external data sources such as recognised global indices, internal reporting mechanisms and stakeholder engagement.

Modern slavery risk may arise in different ways across Arup's business and supply chains. In Arup's project-related activities, this may include the use of sub-consultants or specialist service providers. In Arup's operational supply chain, certain categories of goods and services may require closer attention, including Arup-branded clothing, personal protective equipment, office equipment, furniture and services associated with office operations such as cleaning, security, catering and maintenance.

Oversight of modern slavery risk management activities is maintained through Arup's governance structures, including Board and Executive-level oversight. Operational responsibility is supported by the Ethics & Compliance function and relevant business functions.

This reflects an evolution from the prior reporting period. Further work is planned to formalise risk assessment methodologies and enhance data-driven insights to support more targeted monitoring and continuous improvement.

## Due Diligence Processes

Arup applies risk-based due diligence across its supply chain, including supplier onboarding assessments, contractual controls and ongoing monitoring. Due diligence is tailored to the nature of the supplier relationship and the goods or services being procured, with additional focus applied where risk indicators are identified.

To mitigate risk, Arup assesses suppliers and sub-consultants as part of onboarding and supplier selection processes. New suppliers and sub-consultants are subject to due diligence designed to assess reputation, business practices and relevant people-related risks. Ongoing engagement is supported by Arup's policies and, where practicable, by contracting on Arup's standard terms, which require compliance with applicable laws and Arup's expectations.

Arup is progressing the implementation of a structured and scalable third-party due diligence framework, including the development of an automated supplier onboarding and management portal. Through this portal, suppliers will be required to confirm compliance with applicable regulatory requirements, including those relating to modern slavery. Suppliers will also be screened using third-party due diligence tools to identify potential legal, ethical, reputational or modern slavery-related risk indicators.

Arup also participates in external ESG assessments, including EcoVadis, which provides an independent evaluation of Arup's policies and practices in relation to human rights and modern slavery.

No instances of modern slavery were identified through these processes within Arup's operations or supply chains during the reporting period.

## Training

Ethics learning is mandatory for Arup's permanent and temporary members, including contract and agency staff, as well as statutory directors, officers and trustees. During the reporting period, modern slavery awareness formed part of Arup's mandatory ethics learning programme and was supported by a dedicated modern slavery e-learning module available to members globally.

The training is designed to help members understand what modern slavery is, recognise potential indicators of risk and know how to raise concerns through Arup's Speak Up channels. This is supported by communications and resources that reinforce awareness of modern slavery risks and provide practical guidance on identifying and reporting concerns.

## Collaboration

Arup is a participant in the United Nations Global Compact and the World Economic Forum Good Governance Forum and is a signatory to the World Economic Forum Partnering Against Corruption Initiative. Participation in these initiatives supports Arup's broader commitment to responsible business conduct, transparency and continuous improvement.

## Looking ahead and Key Performance Indicators (KPIs)

Arup is strengthening its approach to measuring effectiveness and will focus on the following priority areas over the next year:

### Priority 1 - Enhance awareness and accountability

- Maintain and improve completion rates for mandatory ethics training that includes modern slavery awareness.
- Continue to embed modern slavery risk awareness within core ethics and compliance learning programmes and supporting communications.

### Priority 2 – Strengthen risk assessment and due diligence

- Formalise the modern slavery risk assessment methodology and apply it to priority supplier or operational categories.
- Increase the proportion of suppliers subject to due diligence screening through the supplier onboarding and management portal.

- Monitor due diligence findings and ensure appropriate follow-up, escalation or remediation actions are taken.

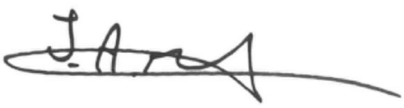
### Priority 3 – Improve reporting, transparency and insight

- Monitor and analyse Speak Up disclosures relating to human rights and modern slavery to identify trends and inform continuous improvement.
- Maintain global Speak Up capability to support consistent reporting and escalation.

To support these priorities, Arup will monitor performance through a set of measurable indicators, including:

- Completion rates for mandatory ethics training and any dedicated modern slavery e-learning module.
- Number and proportion of suppliers subject to due diligence screening.
- Number, nature and status of due diligence findings, including remediation or escalation actions taken.
- Number and nature of Speak Up disclosures relating to human rights or modern slavery, and associated triage, escalation and follow-up actions.
- Progress in implementing a formal modern slavery risk assessment methodology for supplier and operational risk categories.

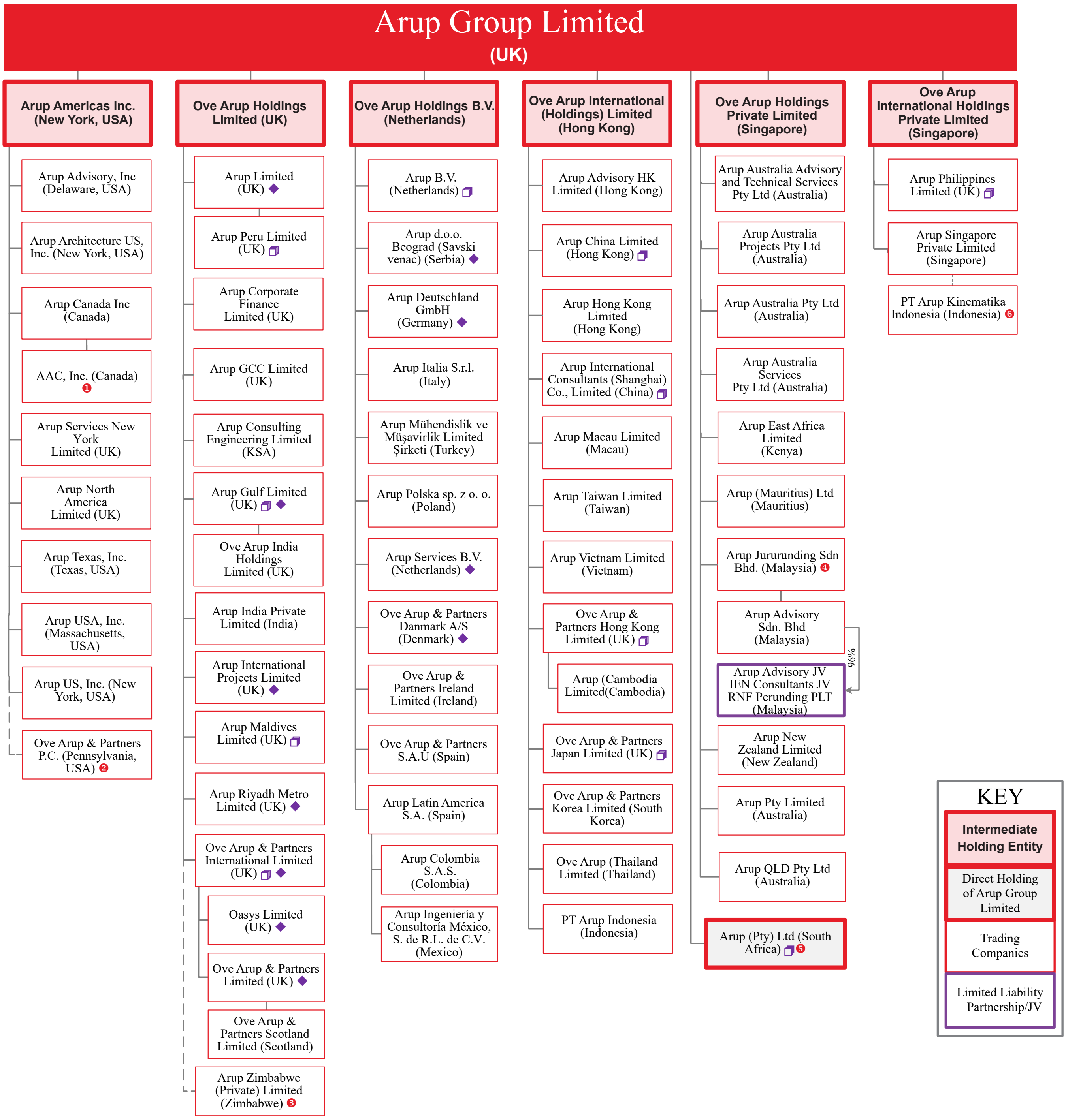
Arup will continue to develop more quantitative and outcome-focused performance indicators in future reporting periods as its Ethics & Compliance framework continues to mature.



Jerome Frost
Chief Executive Officer Arup
Group Limited
July | 2026

*This Statement will be published on the homepage of [www.arup.com](http://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.*

# Operating Companies and Branches as at 29 June 2026




**Branches ( ) and Tax Registrations : (◆)**

**Arup (Pty) Ltd** Branch: Mozambique (in process of deregistering), Zimbabwe (in the process of deregistering)
**Arup B.V.** Branch: Belgium
**Arup China Limited** Branch: Macau
**Arup d.o.o. Beograd (Savski venac)** tax registration: Bosnia and Herzegovina (VAT)
**Arup Deutschland GmbH** Tax Registration: Switzerland
**Arup Gulf Limited** Branch: Dubai, Abu Dhabi, Oman (Government Contract Branch). Tax Registration: Kuwait (CT)
**Arup International Consultants (Shanghai) Co., Limited** Branch: Beijing, Shenzhen, Guangzhou
**Arup International Projects Limited** Tax Registration: Nigeria (VAT), Greece (VAT)
**Arup Limited** Tax Registration: PAN Registration in India
**Arup Maldives Limited** Branch: Maldives
**Arup Peru Limited** Branch: Peru
**Arup Philippines Limited** Branch: Philippines
**Arup Riyadh Metro Limited** Tax Registration: Saudi Arabia (CT)
**Arup Services B.V.** Tax Registration: PAN Registration in India
**Oasys Limited** Tax Registration: PAN Registration in India
**Ove Arup & Partners Hong Kong Limited** Branch: Hong Kong, Macau, Philippines, Taiwan
**Ove Arup & Partners International Limited** Branch: France, Qatar (in process of deregistering). Tax Registration: Denmark (CT), Italy (VAT)
**Ove Arup & Partners Ireland Limited** Tax Registration: Finland (VAT)
**Ove Arup & Partners Japan Limited** Branch: Tokyo
**Ove Arup & Partners Limited** Tax Registration: Jersey (GST)
**Ove Arup & Partners Danmark A/S** Branch: Sweden (VAT)

**Footnotes:**

❶49% owned by Arup Canada Inc., remaining 51% owned by individual shareholders
❷Owned by individual shareholders. Shareholder agreement to link to the Group
❸90% owned by Arup Zimbabwe 2014 Trust
❹70% owned by local shareholders
❺30% owned by The Arup Education Trust
❻33% owned by local shareholders

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