UK Modern Slavery Statement (FY 2022)

Introduction

HDR Inc, is a global multidisciplinary professional services organization operating in more than 200 locations around the globe in a variety of sectors such as architecture, asset management, engineering, economics and finance, planning and consulting, program management, project delivery, research and environmental sciences.

HDR Inc, has over twelve thousand employees worldwide and operates in nine countries. HDR Inc, principal subsidiary in the UK is HDR Holdings Limited (Company No. 11829965) which operates nationally and has a number of UK subsidiaries which have a combined annual turnover of £126,321,934 (**HDR**). This statement summarizes HDR's policies and practices concerning anti-human trafficking and modern slavery in the UK.

HDR is committed to improving our practices to combat slavery and human trafficking in our business and supply chain. HDR strives to eradicate slavery and human trafficking from its supply chain by conducting risk-based due diligence on business partners, providing resources and awareness to employees, maintaining and promoting use of an anonymous reporting hotline, and ensuring the tone from the top encourages a culture of integrity and respect for all individuals.

Structure and Supply Chains

Our work is delivered by staff (permanent, temporary, agency, consultants, consultants, subconsultants) and suppliers. In general, our professional services activities produce a low risk in relation to modern slavery and human trafficking. However, HDR is committed to being a responsible corporate citizen and acting with the highest ethical standards.

Our business

Our business is organised into the following business units:

Architecture – HDR is committed to designing intelligent and inspiring architecture that express our clients' missions and values in areas such as science, education, health, science, urban and community development, and civic and cultural.

Building Engineering Services – Our multidisciplinary engineering, commissioning, building data management, digital and sustainability experts embrace new technologies to be responsive and agile in delivering innovative and elegant solutions to meet client needs in areas such as commercial and real estate, finance, hospitality, tech and data.

Federal – We work in defense and intelligence markets such as civilian agencies, installations, and security.

Resources – HDR provides resilient resource management solutions to address the interdependent social-ecological elements in the industrial, power, and waste arenas.

Transportation – HDR's goal is to develop customized mobility programs designed to improve overall performance in areas such as aviation, freight rail, highways and roads, ports and maritime, and transit.

Water – HDR strives to combine technical innovations with practical solutions by providing services such as source water development, system master planning, infrastructure design and sustainable operations in areas such as conveyance, drinking water, water resource management, fisheries, wastewater.

Advisory Services and Cross Sector Services – HDR works to assist clients with management consulting services such as right of way, geotechnical, urban planning and design, sustainability and resiliency, strategic communications, and asset management.

Field Services – HDR provides skilled professional construction, environmental, and emergency management staff to work alongside our clients, designers, consultants, and stakeholders.

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Our supply chains

Our supply chains include: consultants, subconsultants, suppliers, and other third party vendors over which HDR is capable of exerting control.

Policies

HDR seeks to comply with all applicable laws and regulations regarding forced labor, human trafficking, and modern slavery. Our Anti-Human-Trafficking and Modern Slavery Policy and our Code of Business Conduct ***(HDR.com external Third Party Code of Conduct)*** confirm that we will not tolerate or condone abuse of human rights within our business or supply chain and will take seriously any allegations that human rights are not properly respected. Both HDR's Anti-Human Trafficking and Modern Slavery Policy and our Code of Business Ethics and Conduct are available to all business partners of HDR in addition to HDR employees. HDR's annual ESG Report reiterates our commitment to an ethical workplace and the value of our professionals. HDR reviews and updates all policies on a regular basis.

Training

All HDR employees and new hires undergo annual Compliance Season training, which includes a myriad of internal educational trainings on HDR's policies, Code of Business Ethics and Conduct, global anti-corruption and anti-bribery and more. HDR has the ability to provide additional trainings for employees in higher risk or unique regulatory environments. HDR also has an internal "Ethics Moments" video series which provide employees with guidance on how to handle ethically challenging situations.

Due Diligence and Risk Assessment

We understand that the following areas give rise to the highest modern slavery risks: operations and procurement on a global scale, geopolitical differences, labor shortages, lack of reporting mechanisms or tracking of metrics in certain countries or regions, and lack of transparency in certain countries or regions.

As part of our initiative to identify and mitigate risk HDR has instituted policies and procedures, an audit process and internal controls, anonymous reporting hotline, trainings, and compliance requirements for various business partners.

HDR's Procurement Policy establishes standards for procurement of goods and services on behalf of HDR and any HDR business partners. Our procurement department is charged with applying HDR's Code of Business Ethics and Conduct and Anti-Human Trafficking and Modern Slavery Policy.

HDR performs a risk-based due diligence process to assess any business partner with which HDR may engage. This due diligence process flags potential business partners that present an increased risk and utilizes third-party screening tools to identify potential anticorruption violations, OFAC and other sanctions, human rights violations, and other reputational risks. Parties flagged for risk receive further scrutiny. HDR's due diligence tool also includes a continuous monitoring tool aimed to ensure HDR's decision-making is current.

How We Measure Effectiveness

HDR is dedicated to ensuring our employment practices and internal controls protect the rights of all those who work for us. We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain comply with our values and ethics we have in place supply chain compliance requirements outlined in our Third Party Code of Business Conduct. This consists of compliance requirements for the third party. The Third Party Code of Business Conduct also allows HDR to audit such third party or appoint a third party to conduct an audit. Any violations are reported to HDR and the third party's management for appropriate corrective action. Information for the Integrity in Action anonymous hotline reporting is also included.

We encourage our staff and others working in our supply chain to report any instances of human trafficking, modern slavery, involuntary labor, or complicity with respect to any of the foregoing. HDR has provided all employees with access to an anonymous "***Integrity in Action" Hotline*** for such purposes. All "Integrity in Action" hotline reports are investigated, and appropriate actions taken.

Internal control systems and procedures are subject to regular audits to provide assurance that they are effective in countering Human Trafficking and Modern Slavery.

Further steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking: continue to refine and update our policies, procedures, and internal controls to target noncompliance and promote awareness of activities indicative of slavery and human trafficking; continue to monitor and take appropriate action to reports made through our anonymous hotline; and continue to promote a culture of integrity and respect for all individuals.

This Statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the HDR's slavery and human trafficking statement for the financial year ending December 31, 2022. This Statement has been reviewed and approved by the Board of Directors on 26 June 2023.

HDR HOLDINGS LIMITED



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John W. Henderson, Director

26 June 2023