



# Modern Slavery Policy

Ecorys UK Ltd

<b>Last updated</b>	<b>May 2026</b>
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## Definitions

<b>Ecorys, we or the company</b>	<p>Means Ecorys UK Ltd,</p> <p><b>Registered company number:</b> 01650169</p> <p><b>Registered office:</b> 6th Floor, Queen Elizabeth House 4 St Dunstan's Hill, London EC3R 8AD</p>
<b>Policy</b>	Means this Modern Slavery Policy as amended from time to time.
<b>Responsible Person</b>	<p>Means a) HR (employment practices and training); (b) Line Managers and Project Directors (operational oversight);</p> <p>The Board will: (i) approve this policy annually(ii) ensure adequate resources and training are in place. The policy owner is responsible for maintaining the policy, coordinating reporting, and ensuring periodic review of effectiveness.</p>
<b>Personnel</b>	Means employees, contractors, consultants, temporary, and other workers at Ecorys and its subsidiaries or affiliates, including anyone subcontracted to Ecorys for the performance of Ecorys or Ecorys' Clients work.

## 1. Policy statement and purpose

Ecorys' reputation for conducting its business with integrity, as an ethical company, and with respect for the interests of those whose lives our activities affect, is an asset, just as real as our people and brands.

We aim to run a profitable business, which means investing for growth and balancing short- and long-term interests. It means caring about our customers, employees, consultants, shareholders and suppliers, and the communities in which we conduct our business. We consider it essential that all Personnel understand and comply with our values and share the "Ecorys way" of doing things.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

We are committed to ensuring transparency in our business and in our approach to tackling modern slavery across our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners.

### **Ecorys will:**

- Support our staff to be aware of the risks of human trafficking and modern slavery and to act appropriately when any such risk is detected.
- Conduct due diligence on business partners within our supplier chain.
- Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the appropriate authorities.
- Encourage workers to report cases of third-party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
- Positively encourage and support employees and contractors to report such exploitation which may be occurring within their communities. Points of reference include Line Managers, the Group Compliance Officer and avenues outlined in the Ecorys Whistleblowing Policy.
- Ecorys accepts that job-finding fees are a business cost and will not allow these to be paid by job applicants.
- As appropriate, designate managers to attend training on the prevention of labour exploitation who will have responsibility for developing and operating company procedures.

**This Modern Slavery Policy sets out Ecorys UK zero-tolerance approach to modern slavery and human trafficking, and the controls we apply to prevent, identify and respond to risks within our operations and supply chains. It is a core Ecorys UK policy and applies to all Personnel.**

## Ecorys values



## 2. Scope and application

This policy applies to all Personnel and to all third parties working for or on behalf of Ecorys UK, including suppliers, subcontractors, consultants and recruitment agencies, whether operating in the UK or overseas, who were engaged by Ecorys UK. Where Ecorys UK delivers services to UK public sector clients, this policy should be read alongside relevant contract requirements and our Supplier Selection and Management processes.

We are committed to transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers, and other business partners.

## 3. Organisational structure and supply chains

Ecorys UK Ltd is a professional services organisation. Our supply chain typically includes: (i) subcontractors and associates; (ii) facilities, cleaning, catering and security services; (iii) IT and professional service providers; (iv) travel, events and corporate hospitality suppliers and (v) occasionally, recruitment agencies. We recognise that modern slavery risks can arise in any sector and are heightened where low-paid labour, agency work, migrant labour, informal subcontracting or overseas sourcing is involved.

## 4. Standard of Conduct

### 4.1 Conduct

Ecorys conducts its business with transparency, honesty, and integrity and with respect for human rights, the interests of all our customers, employees, consultants, shareholders and suppliers, and the communities in which we conduct our operations.

All Ecorys personnel have a responsibility to ensure all people we deal with on a day-to-day basis are safeguarded, treated fairly and with dignity.

Ecorys UK will apply risk-based due diligence proportionate to the nature of the engagement. This includes, where appropriate:

- supplier onboarding checks (e.g., ownership, country of operation, labour practices, policies, and adverse media screening);
- contractual controls (e.g., compliance with the Modern Slavery Act 2015, flow-down requirements to subcontractors, and audit/termination rights for material breaches);
- ongoing monitoring for higher-risk suppliers (e.g., periodic reassessment, sampling, and assurance evidence); and
- recruitment controls (e.g., right to work checks, transparent terms and conditions, no unlawful fees, and use of reputable agencies).
- maintain clear policies and procedures preventing exploitation and human trafficking, protecting our personnel, our clients, suppliers, and our reputation.
- be clear about our recruitment policy.
- have in place an open and transparent grievance process for all staff.
- Training is a key control. Ecorys UK will provide: (i) mandatory induction training for all staff; (ii) refresher training for relevant roles; and (iii) where appropriate, enhanced training for procurement, contract managers, project directors and anyone involved in supplier selection or labour engagement. Training completion will be monitored.
- pay a fair wage for staff and a fair market value price for goods and services.
- Ensure all personnel have appropriate contracts in place.

Ecorys UK will not knowingly engage suppliers or partners that do not meet our minimum standards or that fail to remediate identified issues within agreed timescales.

Any Personnel who suspect modern slavery, human trafficking or labour exploitation must report concerns promptly via: (a) their line manager; (b) HR; (c) the legal and compliance team; and/or (d) the Ecorys Whistleblowing line, found on the Ecorys website. Where there is an immediate risk to a person's safety, emergency services should be contacted.

All reports will be assessed, recorded and managed in line with our incident/concerns handling processes. Where appropriate, Ecorys UK will: (i) investigate or commission investigation; (ii) engage the relevant supplier/partner to remediate; (iii) consider suspension or termination of the relationship; and (iv) refer to relevant authorities where required. Ecorys UK will take a victim-centred approach, including signposting to support services where appropriate.

#### **Supervisors and Line Managers will:**

- listen and be approachable to personnel.
- respond appropriately if they are told something that might indicate any personnel may be in an exploitative situation.
- remain alert to indicators of slavery.
- use their experience and professional judgement to gauge situations.
- Ensure personnel complete training.
- follow the reporting procedure if they are told something that may indicate they are or someone else is being exploited or ill-treated.

## 4.2 Identifying Slavery

There is no typical victim, and some victims do not understand they have been exploited and are entitled to help and support.

The following could trigger suspicions that someone may be a victim of slavery or human trafficking. The person:

- May not be in possession of their own passport, identification, or travel documents.
- May not be allowed to speak to you alone.
- May allow others to speak for them when spoken to directly/ may not be allowed to answer you directly
- May be withdrawn or appear frightened.
- May not seem to be able to contact friends or family freely - for example, may not be allowed a mobile phone.
- May not have or be allowed to have social interaction or contact outside their immediate environment.

A person may display several of the indicators above and may not necessarily be a victim of slavery or trafficking. It is better to report suspected issues than ignore them.

## 5. Effectiveness and KPIs

Ecorys UK will measure the effectiveness of this policy and associated controls. Metrics may include:

- % of staff completing modern slavery training within required timescales;
- % of suppliers (and subcontractors) completing due diligence prior to engagement;
- number of higher-risk suppliers subject to enhanced assurance/audit;
- number of concerns raised and time to triage/investigate/close; and
- corrective actions implemented and verified.

These metrics will be reviewed at least annually by the policy owner and reported to the Board (or delegated committee).

The Responsible Person will verify compliance through proportionate monitoring, including: supplier due diligence records, contract reviews, internal audit sampling, and management information (e.g., training completion). Where non-conformities are identified, corrective actions will be tracked to closure.

It is the responsibility of the Ecorys UK Board to ensure that the principles embodied in this Policy are communicated to, understood, and observed by all personnel. The UK Board will not criticise or blame personnel for any loss of business resulting from adherence to these principles. Equally, the Board of Management of Ecorys undertakes that no employee will suffer because of bringing to their attention, or that of senior management, a breach or suspected breach of these principles. The UK Whistleblowing Policy sets out how personnel may raise concerns and the management's response to a concern raised in this manner.

## 6. Exceptions

Any exception to the Policy must be approved in advance, in writing, by the policy owner (or a delegated responsible person) and recorded, including the rationale and any mitigating controls.

## 7. Non-Compliance

Personnel found to have violated this policy may be subject to disciplinary action, up to and including termination of employment or contract. Suppliers and partners may be subject to contractual remedies, including termination, where modern slavery risks are identified and not remediated.

## 8. Review and approval

This policy will be reviewed at least annually (and sooner where required), with version control maintained.

## 9. Associated Documents and Policies

Associated documents include (as applicable):

Whistleblowing Policy;

Safeguarding Children and Vulnerable Adults Policy;

Supplier Selection and Management Policy;

Recruitment and Onboarding procedures;

Business Conduct, Ethics and Social Value Policy; and Information Security and Data Protection policies (where supplier assurance overlaps).