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## **Bill S-211**

### **An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff**

#### **Modern Slavery Statement for the Financial Year ended 2023**

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff. This statement outlines the approach and initiatives by Hatch Ltd. to identify and address the risks of forced labour and child labour in its business operations and supply chains during the financial year commencing October 1<sup>st</sup> and ending September 30<sup>th</sup> 2023.

#### **Who We Are**

We provide professional engineering, technology, and consulting services to the metals, energy, and infrastructure market sectors. Founded more than sixty-five years ago, our global staff of 10,000 professionals work on the world's toughest challenges, spanning 150 countries with capital projects in the billions of dollars under management at any given time.

Our organization is committed to the pursuit of a better world through positive change. We are employee-owned and independent, which enables us to approach our business and client relationships with a long-term view. We deliver complex capital projects, optimize operations, and develop new technologies.

Based on the principles of our Manifesto and from founder, Gerry Hatch, we have built a strong reputation for conducting business with integrity. Modern slavery is a crime and a violation of fundamental human rights. We believe that to mitigate risk in relation to modern slavery, we have a responsibility to work with organizations in our supply chain to identify and eliminate risks of personal exploitation for personal or commercial gain.

Embracing our obligations under the Canadian Modern Slavery Act we assess potential suppliers and partners in accordance with our commitment to identify and eliminate risks of modern slavery. We strive to protect human rights and freedoms through ongoing due diligence. We are guided by our corporate policies and commitments, which can be found online at [About Hatch](#).

#### **Group Structure**

Hatch Ltd. is 100% owned by Hatchcos Holdings Ltd., both of which are Canadian companies. The Hatch Group of Companies is 100% employee owned. The shareholdings of our employee shareholders is private and confidential information.



## Supply Chain

We deal with supply chain issues in the following areas of our business:

- *Permanent and temporary or contract employees of Hatch providing professional services*

Hatch has a large global workforce which delivers professional services in the metals, energy, and infrastructure market sectors. The services we offer are in highly specialized areas with the result that our business is generally not exposed to risks of forced or child labour.

- *Subconsultants retained by Hatch to support our professional services*

Hatch delivers its professional services normally without subconsultants. From time to time, however, Hatch retains professional services from other consultants to assist us in delivering on our mandates.

- *Procurement that we perform as agents on behalf of our clients in Hatch's larger consulting professional services mandates to design and deliver facilities for our clients*

These larger professional services mandates relate to our detailed engineering and project support services as a procurement agent on large client projects in the metals, energy, and infrastructure market sectors.

- *Goods and services that support our overall global operations such as office leases, utilities, IT hardware and software, office equipment, marketing material, stationary supplies, catering and cleaning services, and personal safety, clothing, and equipment*

This category of procurement relates to goods and services needed for the operations of our offices in connection with the proper and professional delivery of engineering services.

Hatch procures computers, offices supplies, and professional services of third parties to assist us support our general operational needs as a large firm of consulting engineers.

## Risks in Supply Chain

### *A. Permanent and temporary or contract employees of Hatch providing professional services*

Because the professional services offered by Hatch are in highly specialized technical areas, our business generally is not exposed to risks of modern slavery. Our employees, design professionals, and corporate staff are employed on contracts with standard terms allowing the employee to terminate their employment on notice. All employees are paid at or above the relevant minimum wage in their jurisdiction.

Hatch has assessed the risks of modern slavery violation in the professional services area of our business as generally very low for two main reasons. First, our offices are in regions where the risk of modern slavery is low. As well, the type of services we provide are sophisticated and do not pose any risks for child or forced labour. Our professional services industry does not pose any significant relevant modern slavery risks.



### ***B. Subconsultants to support the professional services Hatch provides***

Like Hatch's own workforce, the workforce of our subconsultants are generally professional and office staff serving as permanent employees. Our subconsultants operate in the same engineering and consulting profession as Hatch. As well, they engage their staff on employment contracts similar to those offered to our staff.

These subconsultants also have their offices located in the same regions in which we work. The services our subconsultants provide are sophisticated, like ours, and their staff is either professional or semi-professional people with post secondary education and highly specialized training.

When professional recruiters assist us in hiring contract employees for large projects in foreign countries, we comply with local law. We allow our contractors to terminate contract on notice. All contract employees are paid at or above the relevant minimum wage in their jurisdiction and in accordance with applicable laws.

### ***C. Procurement when executing Hatch's larger consulting mandates***

On our larger implementation projects, we often are the procurement agent for our clients when they are purchasing equipment and bulk materials for the construction of their facilities. We believe the risk of modern slavery violations in this area of our business to be relatively small because of the type of procurement (specialized equipment) and our highly customized facilities we design.

On our large projects, our clients take ultimate responsibility for their supply chain choices. Some of our clients' projects are in jurisdictions where there are higher risks for modern slavery. We have identified tier 2 and tier 3 subcontractors and suppliers to be areas of potential risk. Where we are acting as Owner's Construction Manager at their projects, our Construction Management and Procurement groups initiate a pre-screening and selection process for both National and International construction contractor participation in construction of the project. This is followed by a rigorous contract tender, bid evaluation and construction contractor recommendation process prior to contract award. When construction contractors have mobilized, our Construction Management team implement industrial relations programs tailored to the project to provide ongoing monitoring of worker welfare issues and processes for their resolution. These programs offer open discussions on items such as compensation, travel, accommodation and hygiene, hours of work and worker fatigue as well as opportunities for workplace improvement. As a trusted procurement agent, we help clients implement best practices when advancing their modern slavery initiatives.

Most of our large clients have policies in place on modern slavery, sustainability, and other supply chain initiatives. We are often asked to ensure compliance with relevant legislation in connection with supply chains for our projects. As a consultant performing procurement services as agent, we aim to have a positive impact and influence when assisting clients as a consultant.

Hatch's procurement teams monitor the technical depth, capacity, and business practices of our main suppliers with most of whom we have well-established relationships. Hatch's list of suppliers is regularly purged and updated as we perform our ongoing monitoring and due diligence.

The list presently consists of approximately 2,000 active companies. Regular reviews of our supplier list encourages modern slavery best practices.



#### ***D. Goods and services that support our corporate operations***

Hatch considers modern slavery risks in our day-to-day corporate and office operations as low. When procuring office leases, utilities, IT hardware and software, office equipment, marketing material, stationary supplies, catering and cleaning services, we deem ourselves exposed only to second and third tier supplier risks and mostly in remote jurisdictions only i.e., the subcontractors and unknown suppliers assisting our suppliers.

We consider the manufacturer of electronics and personal safety, clothing, and equipment for our personnel to be areas to monitor. To mitigate risks, we intend to pay more attention to suppliers and jurisdictions which are new to us. As well, we have retained a third-party service provider to monitor our suppliers and provide us regular status reports and alerts in relation to both new and existing suppliers contained in our global database.

#### **Actions Taken**

Our employees are expected to abide by our Code of Conduct, which helps to create a culture that fosters transparency. We strive to empower our people with the correct tools to avoid, identify, and respond to legal and ethics-related issues.

Suppliers, contractors, and business associates working under Hatch's direction are also expected to comply with our Code of Conduct. This Code applies to all contractors working for us in any capacity, including their employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representative, joint venture, and partners business partners.

Hatch is introducing a vendor self-assessment questionnaire which will address among other risks, modern slavery risks. For new and existing subconsultants and goods and services suppliers, Hatch will introduce the requirement that this self-assessment questionnaire be completed. Answers to the questionnaire will be reviewed as part of our due diligence process when assessing whether to conduct business with proposed suppliers.

As part of our onboarding process, Hatch intends to provide basic training to our procurement teams on modern slavery risks to enable our teams to improve their recommendations. Where Hatch is performing procurement services on behalf of our clients, we are often asked to use our clients' systems and processes for identifying modern slavery risks.

Hatch directors have overall responsibility for ensuring we comply with our legal and ethical obligations. Our employees are expected to understand and comply with our Code of Conduct. Employees are required to avoid any activity that might lead to, or even suggest, a breach of our Code of Conduct. Employees will be encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage.



### **Risk Assessment**

We are introducing steps to mitigate the risks of modern slavery by managing third parties through site visits, interviewing new entities within the supply chain, and questionnaires for suppliers to complete to better assess risks. We intend to implement best practices wherever we see a need for improvement.

We are monitoring risks in countries and jurisdictions that have yet to embrace modern slavery initiatives. When acting as a procurement agent, we will continue to consider compliance with modern slavery initiatives from the perspective of our clients and ourselves.

For new suppliers that Hatch directly engages, we will be introducing ongoing monitoring practices to better manage this risk and the potential of modern slavery risk.

### **Remediation**

As of this time, we have not experienced any impacts in Hatch's supply chain and no forced/child labour has been identified within any of our suppliers. Hence, Hatch has not had to implement any remedial actions to manage known or actual modern slavery risks.

If we become aware that remediation measures are required to address the issues of forced/child labour, we will promptly take such steps as are necessary to protect victims and prevent recurrence.

### **Training**

Training on the risk our business faces from modern slavery in its supply chains will form part of the onboarding process for all individuals engaged in procurement activities at Hatch. Our commitment to addressing the issue of modern slavery in our business and supply chains is to be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### **Effectiveness Assessment**

At this stage, no Key Performance Indicators or other measures have been put into place to measure whether our policy is effective. Going forward, it is expected that at minimum we will review annually the number of employees trained and the number of suppliers made aware of modern slavery initiatives and remediation actions.



This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year ending September 30<sup>th</sup>, 2023. It has been issued on behalf of Hatch Ltd. and approved by the Board of Directors.

Signed *DATED MAY 31, 2024*

DocuSigned by:  
*John Bianchini*  
GIOVANNI BIANCHINI, Director  
I have the authority to bind Hatch Ltd.

DocuSigned by:  
*[Signature]*  
JOHANNES LOMBARD, Director  
I have the authority to bind Hatch Ltd.

DocuSigned by:  
*Robert Francki*  
ROBERT FRANCKI, Director  
I have the authority to bind Hatch Ltd.

DocuSigned by:  
*Doug Stirling*  
DOUG STIRLING, Director  
I have the authority to bind Hatch Ltd.

DocuSigned by:  
*Michael Schatz*  
MICHAEL SCHATZ, Director  
I have the authority to bind Hatch Ltd.

# Our Manifesto

**OUR VISION**

We are passionately committed to the pursuit of a **better world** through **POSITIVE CHANGE**.

**OUR MISSION**

**TOGETHER** we create unprecedented outcomes for our clients by **partnering with them** to develop **better ideas**.



Our **exceptional, diverse teams** combine vast engineering and business knowledge, applying them to the **world's toughest challenges**.



We build practical **SOLUTIONS** that are **SAFE, INNOVATIVE, & sustainable**.

**OUR VALUES**

**INNOVATING** all that we do

Acting *like* **OWNERS**

Achieving **NO** harm

**nurturing** long-term relationships

DOING OUR **homework**

Encouraging a **flat, connected organization**

Engaging great people who make a **difference**

Thinking globally; acting locally

ENSURING **cost** effective, efficient **delivery**

Living our **commitments** with integrity

Being unconditionally **HONEST**

*"We believe in exceptional ideas delivered with exceptional service."*



+  
Our Code  
of Conduct

**HATCH**



# Our values

Our values guide everything that we do. They are the foundation from which we run our business, integral to how we express ourselves as a group and direct our engagement with stakeholders and partners, as we seek to inspire their trust and deliver real value to their businesses.

We believe in exceptional ideas delivered with exceptional service.

Exceptional ideas come from:

- Doing our homework
- Innovating all that we do
- Engaging great people who make a difference
- Acting like owners
- Encouraging a flat, connected organization

Exceptional service comes from:

- Achieving no harm
- Nurturing long-term relationships
- Thinking globally, acting locally
- Ensuring cost effective, efficient delivery
- Living our commitments with integrity
- Being unconditionally honest



## Message from the CEO

We believe that together we can change our world for the better. To do this well, we must, at all times, conduct ourselves with integrity. We must maintain the highest standards of ethical behavior in every corner of our business. And above all, we must be accountable for our actions, as we partner with clients, communities, and stakeholders to deliver safe, respectful, legal, and sustainable projects around the world.

Our Code of Conduct is driven by these values. It helps us to create a culture that fosters transparency, and it empowers our people with the right tools to avoid, identify, and respond to all ethics-related issues.

We are all responsible for adhering to the Code and have a duty to report all ethics-related issues. You are the embodiment of our values. Please take the time to read and understand the Code and encourage your colleagues to do the same.

Thank you for living your commitments with integrity and believing in our business.

A handwritten signature in black ink that reads 'John Bianchini'.

John Bianchini  
Chairman and Chief Executive Officer

# Application of the Code of Conduct

Hatch employees must behave in accordance with the principles stated in this Code while performing their duties, with clients, with colleagues and when representing Hatch in any environment (i.e., client events, industry events, teams meetings etc). We expect that our contractors, suppliers, joint venture partners, subcontractors, and vendors who work with us act in a manner consistent with these principles.

At the same time, when we work with our clients and partners, we respect and comply with their codes of conduct. If there is an inconsistency between codes, the most stringent will apply.

## Our Promise

This is how we deliver value to our clients.

### Safety

Health and safety is at the core of everything we do. It's more than just managing risks—we make safety a front-of-mind issue for everyone, building a strong safety culture for employees, partners, and the communities we serve. We believe this is imperative to mitigate risks and reduce incidents.

We do this by:

- Working together safely with the goal of "no harm" to people, the environment, and communities associated with projects and activities managed by Hatch
- Designing facilities for our clients that are inherently safe to operate
- As individuals, working free from the influence of any substance that could prevent us from conducting our work safely and effectively.

### Quality

Achieving the highest attainable standards to enable asset owners to achieve their business goals, safely and responsibly—that's always the key objective. We have processes and structures in place to help

ensure consistency of equipment, skills, and service, for optimal project results. Our Quality Management System is designed to continuously find new ways to enhance project outcomes. It documents best practices and empowers us all to achieve exceptional results. By working closely with our partners, and welcoming their feedback, we are constantly improving and finding new ways to do things better. At all times, we are rigorous in our work so it is correct, complete, and consistent.

We do this by:

- Building systems and processes that allow you to communicate and work together effectively on a global basis
- Encouraging excellence in our people, through professional and personal development, and ensuring everyone can make a difference
- Innovating in all that we do, applying new ideas to help our clients achieve unprecedented and sustainable business results
- Continuously improving the quality of our deliverables and our services.

## Sustainability

We define sustainability as the optimization of environmental protection, economic prosperity, social justice, and cultural vibrancy to ensure that businesses, ecosystems, and communities thrive, now and in the future. Sustainability is at the core of how we deliver value to our clients as a socially responsible company.

We demonstrate sustainability by:

- Optimizing environmental, social, economic, and cultural impacts in all aspects of our business
- Planning, designing, and implementing projects that focus on creating sustainable value for our clients and their communities
- Following the Hatch Project LifeCycle Process, incorporating sustainability principles in all aspects of our services
- Operating our own facilities in a safe, environmentally and socially responsible manner, while minimizing our footprint
- Developing, employing, and disseminating innovative technologies and methods that integrate sustainability into our business and our clients' facilities
- Contributing to the communities in which we live and work through initiatives such as volunteering and charitable giving, with a particular focus on educational scholarships
- Providing us all with the training, opportunity, and encouragement to integrate sustainability as part of our work.

## Global compliance

We comply with all laws and respect the customs and business practices of the countries in which we work.



# Responsibility and accountability

We honor our commitments, take responsibility for all matters over which we have control, and are accountable for the results and consequences of our work.

## Our expectations

We are all individually responsible for:

- Complying with the provisions of our Code and completing the training upon induction at Hatch
- Being aware of and respecting the laws and regulations applicable in all jurisdictions in which we work
- Making sure we understand and apply the policies and standard operating procedures relevant to our individual scope of work
- Immediately seeking help or guidance from available resources when in doubt
- Being unconditionally honest, reporting any breach or suspected breach of our Code, its underlying policies, or standard operating procedures
- Living our commitments with integrity, always.

In addition, we expect those in leadership to:

- Lead by example and live up to the standards of our Code
- Ensure our colleagues understand and follow the standards set forth in our Code, policies, and standard operating procedures
- Develop an open and accessible environment where our colleagues feel welcome to report their concerns without fear or discrimination
- Support and protect individuals who, with honesty and integrity, raise a concern or report potential unethical or non-compliant behavior
- Follow up when we hear about potential misconduct and never ignore questionable behavior.

## Behavior

We expect all Hatch employees and any person working with or for Hatch to demonstrate appropriate behaviors:

- Cultivate and foster a diverse and inclusive culture.
- Maintain a professional demeanor in all settings and interactions when attending any Hatch-sponsored function, client event, industry event, and, but not limited to, any social media accounts/platforms that you may use.
- Any personal opinions or statements in a business setting or on any social media platforms should include a statement clarifying your thoughts are your own and do not reflect the views of Hatch.
- When providing information to the public, report all related facts accurately, completely, and in a timely and comprehensive manner. Care should be taken to not disclose confidential company or client information. If you are unsure, you must seek appropriate approvals.
- Do not speak with the media on behalf of Hatch, our clients, or partners without express written approval that has been granted in advance by Hatch's public relations team.

## Respect in the workplace

We maintain a supportive, professional, and positive workplace environment by:

- Appreciating the unique skills, experience, and talent of each individual
- Treating everyone with courtesy, fairness, and respect
- Believing that a diverse workforce is a strong workforce, capable of developing compelling ideas and achieving better business results
- Creating a vibrant work environment that is open, challenging, and fun
- Individually and collectively striving to keep our workplace free from harassment, bullying, violence, and discrimination
- Encouraging employees to enhance their professional and personal development, reach their full potential, and make a difference.

## Relationships

We build relationships and teams based on trust, honesty, integrity, and respect. Our teams actively collaborate and openly share their experience and knowledge globally.

## Confidentiality and privacy

We understand and respect the sensitive and confidential nature of the information that we are provided, in our roles and by clients, and do not release this information without appropriate consent—unless required to do so by law.

We respect and protect the privacy of personal information, including you, as an employee, and those who work with us.

## Fairness, integrity, and honesty in our dealings

We establish and maintain professional relationships with our clients, contractors, suppliers, vendors, joint venture partners, and others, based on mutual respect, integrity, and honesty. We achieve this by:

- Prohibiting acts of corruption, bribery, or the improper influencing of decision makers
- Respecting that gift-giving and providing entertainment is an important cultural business practice in some of the countries in which we work. At the same time, we use careful judgment to ensure that we do not offer or accept such benefits when the situation could either reasonably be perceived to create an obligation or would be in breach of the recipient's policies
- Avoiding any situation that creates or appears to create a conflict of interest, and informing clients of all known or perceived conflicts of interest
- Not disclosing or trading upon non-public, market sensitive information
- Competing fairly and ethically, offering services based on our qualifications and experience
- Observing applicable laws regarding political contributions, activities, and lobbying.



## Further guidance and raising concerns

While most ethics-related decisions can be made using good judgment, sometimes the answer is unclear. Our Code is designed to provide you with the clarity you need to address those difficult decisions. If the answer is still unclear after consulting the Code, further guidance can be obtained from our company's corporate policies, found on Hatch Hub, by speaking with your manager or Human Resources representative.

If you are aware of a situation that you believe may raise concerns under our Code of Conduct, you should try to raise it first with the person involved. If this is not possible or successful, then promptly bring the matter to the attention of your manager, Human Resources representative, an associate, or board member; alternatively, you can submit your query or report confidentially, securely, and anonymously through our web-based **Hatch Code of Conduct anonymous email hotline**. Every report will be duly investigated and Hatch supports individuals who report genuine concerns.

HATCH



# Code of Conduct Acknowledgement



## Compliance

This Code of Conduct establishes the standards of behavior Hatch expects from all their employees and where these standards are not met, Hatch reserves the right to require the employee in question to bring themselves into full compliance with the requirement(s) in question within a defined and reasonable time period and to correct their behavior to Hatch's satisfaction. In the event of serious, material and/or persistent non-compliance Hatch will take appropriate disciplinary action against the employee.

## Hatch Employee

I acknowledge that I have read, understood and will comply with the Hatch Code of Conduct.

Signed \_\_\_\_\_

Date \_\_\_\_\_

Name \_\_\_\_\_

Hatch supplier, consultant, contractor, or business associate, where such person shall be working under Hatch supervision and performing services for and on behalf of Hatch or in joint venture or partnership with Hatch.

On behalf of \_\_\_\_\_ (name of supplier/consultant/contractor/business associate) the undersigned acknowledges that he/she has read, understood and will comply with the Hatch Code of Conduct while working with Hatch.

Signed \_\_\_\_\_

Date \_\_\_\_\_

Name \_\_\_\_\_

Title \_\_\_\_\_



HATCH



## 2024 Statement on Modern Slavery

Our vision at Hatch, as stated in our Manifesto, is that we are passionately committed to the pursuit of a better world through positive change. Our Manifesto also includes our values that guide everything we do and are integral to how we express ourselves as a group. Based on these values, Hatch has built an unwavering and strong reputation for conducting business with integrity, earning the respect and trust of our clients, employees, and the communities in which we work.

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 in order to exploit them for personal or commercial gain.

One of our core values at Hatch is achieving no harm. We believe that to achieve no harm in relation to modern slavery, we have a responsibility to continuously work with organisations in our supply chain to identify modern slavery risks and eliminate them.

### About Hatch

The Hatch group of companies is an employee-owned, multidisciplinary professional services firm that delivers a comprehensive array of technical and strategic services including engineering, consulting, information technology, process development and project and construction management and procurement services to the metals, energy, and infrastructure sectors. Hatch has served clients for over six decades and has project experience in over 150 countries and has over 9,000 employees.

As a global group of companies Hatch is committed to ensuring there is transparency not only in our own business but in our approach to tackling modern slavery in our supply chains.

This statement addresses Hatch's obligations for its reporting entities required by the UK Modern Slavery Act 2015<sup>1</sup> and the Australian Modern Slavery Act 2018<sup>2</sup>.

### Hatch Structure

Hatch operates offices globally including in Canada, United States, Brazil, Chile, Colombia, Peru, Russia, United Kingdom, UAE, South Africa, China, India, Indonesia, and Australia.

Operationally, the management of Hatch is divided into regions under the supervision and governance of our Global Board of Directors. Experienced and long-standing Hatch employees manage the regional operations of Hatch. Hatch operates under a common risk framework that applies to the entities covered by this statement.

### Risks of Modern Slavery in the Operations and Supply Chains of Hatch

For our employees and contractors that Hatch directly employs or engages, Hatch has assessed the risks of modern slavery as very low. Whilst we operate in some jurisdictions where there are higher risks for modern slavery, the majority of our workforce are permanent employees and our employees and employees on contracts with standard terms allowing the employee to terminate their employment on notice and all employees are paid at or above the relevant minimum wage in their jurisdiction. Where we engage recruiters to assist in the recruitment of contract employees for our large projects, we comply with all applicable local laws. We allow our contractors to terminate their contract on notice and all contractors are paid at or above the relevant minimum wage in their jurisdiction and in accordance with all applicable local laws.

Hatch's supply chain consists of the following:

- Subconsultants to support the professional services we provide.
- Goods and services that support our operations such as office leases, utilities, IT hardware and software, office equipment, marketing material, stationary supplies, catering and cleaning services and PPE.
- Procurement that we perform as agents for and on behalf of our clients; and
- Procurement for Hatch supplied technologies.

There is the potential for there to be modern slavery risks in Hatch's supply chain and Hatch has and is implementing the actions outlined below to manage this risk.

#### Policies and Actions in Relation to Slavery and Human Trafficking

Our employees are expected to abide by our Code of Conduct, which helps to create a culture that fosters transparency, as it empowers our people with the correct tools to avoid, identify, and respond to all ethics-related issues. Our suppliers, contractors, consultants, and business associates working under Hatch's direction in addition to joint venture partners are expected to have read, understand, and comply with our Code of Conduct. Our Code of Conduct applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

Hatch has produced an internal process guide with respect to Worker Welfare (The Worker Welfare Guide) that addresses many of the key issues within the UK and Australian Modern Slavery Acts. The Worker Welfare guide ensures that the Contractors in our supply chain with whom we work on Projects hold an equal regard for the health, safety, and welfare of the Project workers to promote a healthy environment for workers, and further improve project delivery, quality, safety, and sustainability outcomes for our clients. This Worker Welfare Guide is to be adopted across all Hatch's projects, with a particular focus on our large projects in high-risk jurisdictions and is complementary to this Modern Slavery Act Statement.

We expect the same high standards from all of our contractors, suppliers, and other business partners and, as part of our contracting processes have introduced specific prohibitions against the use of forced, compulsory or trafficked labour. We expect that our suppliers will hold their own suppliers to the same high standards and have introduced contractual provisions requiring our suppliers to conduct due diligence of their supply chain.

In the Australian region, Hatch is requesting key existing suppliers to complete a vendor self-assessment questionnaire on modern slavery risks. Going forward, for all new subconsultants and good and services suppliers, Hatch will introduce the requirement that this self-assessment questionnaire be completed, and the questionnaire reviewed as part of our due diligence process of assessing whether to do business with the relevant company.

Where Hatch is performing procurement services on behalf of our clients, we are often using our clients' systems and processes for identifying modern slavery risks. Hatch has and will continue to provide training to our procurement teams on modern slavery risks to enable our procurement teams to recommend if any of our clients' systems and processes could be improved for assessing modern slavery risks.

#### Responsibility for the Policy

The UK and Australian directors have overall responsibility for ensuring this Statement complies with our legal and ethical obligations, and that all those under our applicable control comply with it. Management at all levels are responsible for ensuring those reporting to them understand and comply with this Statement and are given adequate and regular training on it and the issue of modern slavery in supply chains.

#### Compliance with the Policy

Our employees are expected to understand and comply with this Statement and our Code of Conduct. The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might lead to, or even suggest, a breach of this policy. Employees must notify as applicable, the applicable HR business partner as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If an employee believes or suspects a breach of this policy has occurred or that it may occur, they must notify their applicable HR business partner or report it in accordance with our Hatch Code of Conduct Hotline as soon as possible. Where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains. Where a supplier will not engage in a remediation process to address modern slavery or Hatch considers that it is not appropriate to continue business dealings with the supplier, Hatch will end the business relationship.

Communication and Awareness of this Policy

Training on this policy and on the risk our business faces from modern slavery in its supply chains forms part of the induction process for all individuals who work for us and is provided, as necessary. Our commitment to addressing the issue of modern slavery in our business and supply chains is to be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



John Bianchini  
Chairman & CEO, Hatch  
January 2024

