

ANTI-SLAVERY POLICY AND PROCEDURE

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Last updated: May 2024

1. INTRODUCTION

RWDI's Modern Slavery and Human Trafficking Statement relates to actions and activities for the financial year ending 31 July 2024. This policy follows the guidance of the Modern Slavery Act 2015 and Forced & Child Labour in Supply Chains Act 2024.

This statement sets out RWDI's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains.

We all have a duty to be alert to risks, however small and staff are expected to report their concerns and for management to act upon them.

RWDI reserves the right to amend and update this policy as required. For the avoidance of doubt, this policy does not form part of your contract of employment.

This policy applies to RWDI Anemos, Southdowns Environmental Consultants Ltd., Rowan Williams Davies & Irwin Inc., and RWDI AIR Inc.

2. SCOPE

This policy applies to all employees of RWDI globally.

RWDI is a global engineering and environmental consultancy, providing multi-disciplinary services to the property, infrastructure, environment and energy markets across the world.

Our supply chains consist primarily of suppliers of materials and equipment to our offices but can occasionally include professional service providers acting as sub-consultants.

RWDI considers its activities to be of low risk in respect of slavery and human trafficking, although through continual review and assessment of current and new suppliers, RWDI will identify where there may be any potential for particularly high risks.

3. PROCEDURE

3.1. Organizational Tools

Responsibility for the Company's anti-slavery initiatives is as follows:

- Policies: The Group Director of HR Services is responsible for creating and reviewing policies. The process by which our policies are developed is looking at best practice and adapting to the needs of the business.
- Risk assessments: The Project Manager Offices (PMO) is responsible for maintaining the procedure which covers due diligence checks on suppliers with regards to human rights and modern slavery. This procedure is periodically reviewed and results reviewed by senior management on an annual basis.

• Due diligence: Group HR and PMO are jointly responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking and reported immediately to the Board.

3.2. Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, RWDI will communicate its statement widely, internally and externally, and through publication on the company's intranet and website. In any circumstances where we consider there may be a high risk, appropriate training will be developed and targeted at those personnel who may have direct exposure.

3.3. Performance Indicators

RWDI will regularly assess how effective it is in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains through regular audit review, including for resource monitoring and our payroll systems.

This Modern Slavery and Human Trafficking Statement and Forced & Child Labour in Supply Chains Act Statement will be regularly reviewed and updated as necessary. The Board of Directors endorse this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement and Forced & Child Labour in Supply Chains Act Statement has been approved and authorised by:

Name: Michael J. Soligo, M.A.Sc., P.Eng.

May 29, 2024

Position: President /CEO

"I have the authority to bind all companies named in this document"

Signature: