

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

2022

A photograph of three people standing in a field at sunset, looking towards a mountain range. The scene is bathed in the warm, golden light of the setting sun, creating a silhouette effect on the figures and the landscape. The sky transitions from a deep blue at the top to a bright yellow near the horizon. The foreground is a field of tall grasses, and the background features a range of mountains under a hazy sky.

APEM Group

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1. APEM Group structure, operations and supply chains

1.1. Organisational structure

APEM Group



The APEM Group are a global geospatial environmental consultancy providing independent advice and guidance to support government and environmental regulatory guidelines. Our integrated approach covers all areas of the natural environment, supporting industries with expert advice reinforced by data excellence. With a scientific mindset and innovative technology, our specialists provide a comprehensive range of integrated freshwater, marine, terrestrial and geospatial specialist services for clients across Europe, the US, Australia, and Asia.

While the APEM Group have grown mainly through organic expansion, acquisitions have accelerated the path to the current 500+ strong team. With employees in the UK, Ireland, Australia, Germany and the USA, we provide independent environmental consultancy and expert advice to clients in industries including water, renewables, power and utilities, marine and ports, transport, construction and development.

Since 2021, the APEM Group have made three acquisitions:

- [Woodrow](#), an environmental and sustainability consultancy based in County Sligo, Ireland in July 2021.
- [AQUAFACT](#), a specialist in marine surveys, based in Galway, Ireland in February 2022.
- [GoBe Consultants](#), a planning and environmental services consultancy based in Devon and Glasgow in July 2022.

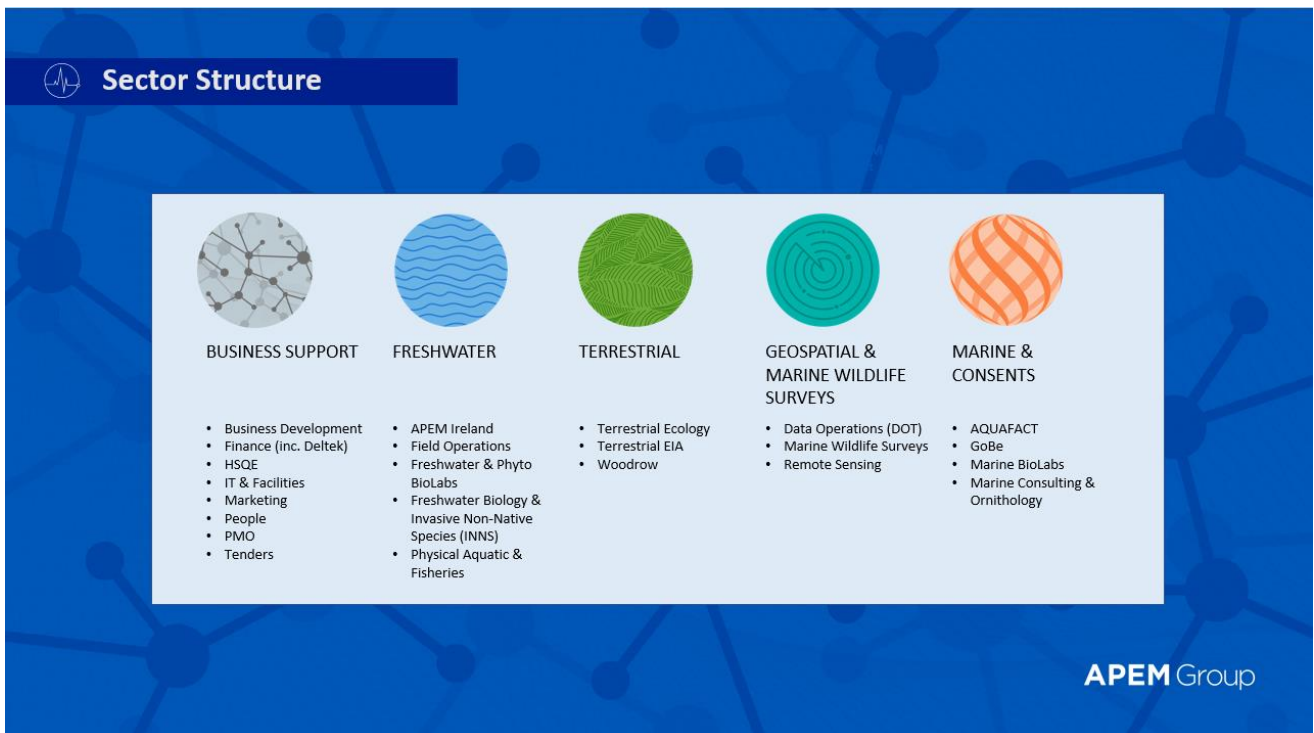


Figure 1 APEM Group sector structure

1.2. Supply chains

We recognise that our supply chains extend globally, and we are dedicated to ensuring that our suppliers and business partners share our commitment to prevent modern slavery through ethical practices and human rights. We use a selection of reputable suppliers that undergo vetting and auditing as part of our due diligence processes.

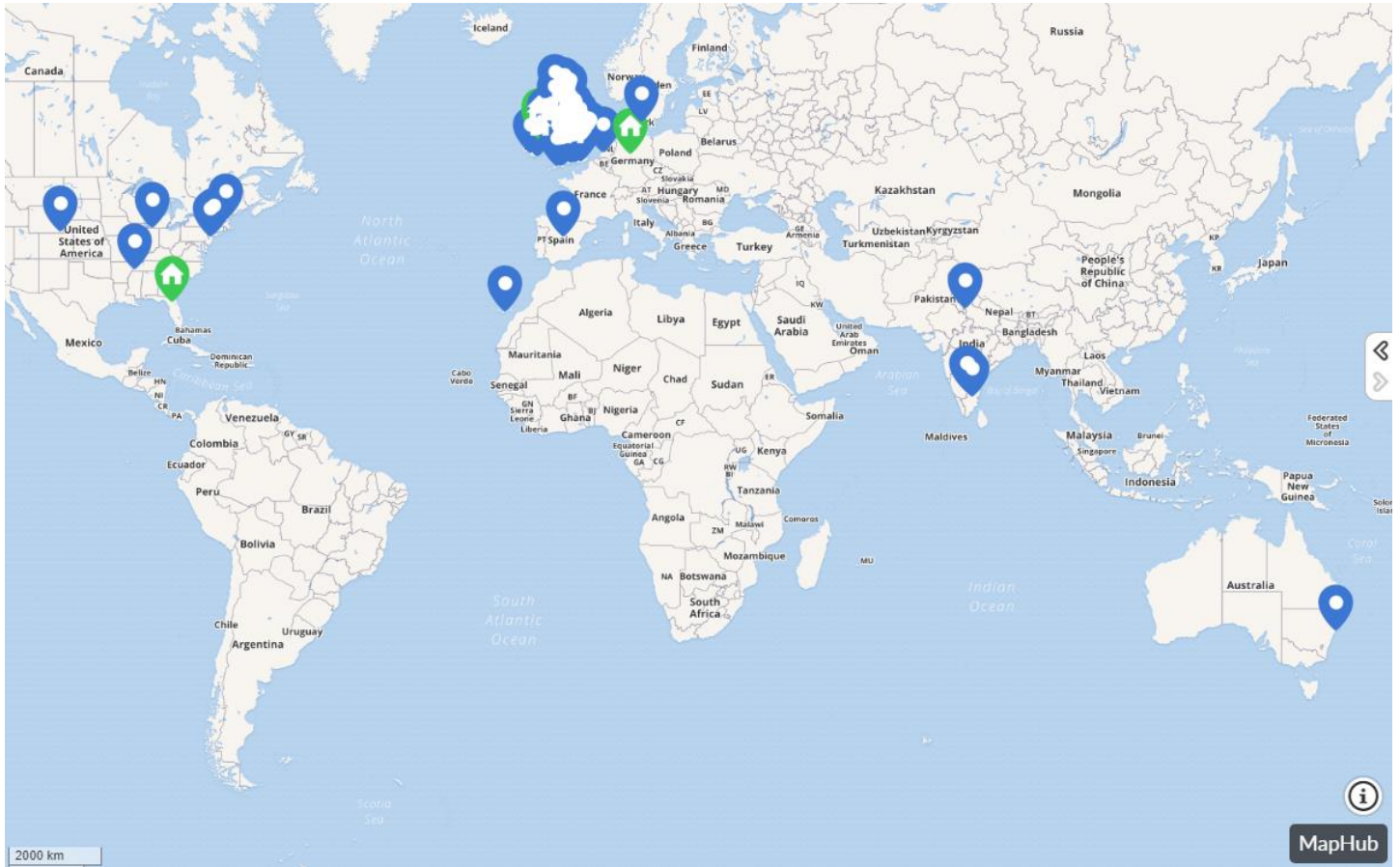


Figure 2 Map of APEM Group approved suppliers and their geographical locations

2. Policies in relation to slavery and human trafficking

2.1. APEM Group Modern Slavery Policy

APEM are committed to preventing modern slavery practices in our operations and supply chain to ensure that we are supporting global efforts to improve the lives of all people on this planet. Our policies outline the standards we aim to maintain to prevent modern slavery risks within our operations and procurement practices, and ensure that our stakeholders comply with the same rigorous standards.

This annual Modern Slavery Statement highlights our ongoing efforts to address any risks and promote ethical practices, promote human rights and ensure that slavery and forced labour have no place in our business activities.

Our Modern Slavery Policy is also supported by the following policies on:

- Ethics
- Whistleblowing
- Ethical Procurement
- Anti-Bribery and Corruption

Our corporate standards documented in the suite of policies, handbooks, and terms and conditions set out clear expectations regarding labour standards, fair wages, working conditions and the prohibition of forced labour or human tracking. We expect our stakeholders to adhere to these standards, and we communicate our expectations during employee induction and supplier onboarding processes.



3. Due diligence processes

3.1. Human Resources

Within the APEM Group we are committed to upholding the highest standards of ethical conduct and human rights throughout our operations. We recognise that modern slavery and human trafficking are abhorrent practices that have no place in our organisation.

We commit to creating a workplace free from any form of forced labour, human trafficking, or exploitation. We adhere to all applicable labour laws and regulations, guaranteeing fair pay, working hours, and safe working conditions for our employees. We have a zero-tolerance approach towards modern slavery, extending to all levels of our organisation, including contractors, subcontractors, and third-party suppliers.

Additionally, we provide comprehensive training to our People team, equipping them with the knowledge and skills to identify potential indicators of modern slavery within our workforce. We maintain open lines of communication, empowering employees to report any concerns or suspicions without fear of reprisal.

3.2. Procurement

Procurement practices, manufacturing and supply of goods and services performed by suppliers and vendors can have some of the most significant implications on human rights. We are committed to identifying and managing these risks by conducting due diligence activities such as audits, engaging with suppliers and communicating our expectations.

All employees involved in procurement activities must comply with our Modern Slavery Policy whether these are internal to APEM or a part of our supply chain partners operating as an extension of our business. Our commitment to eradicating modern slavery in all its forms must be embedded in all procurement activities. The procurement department shall take clear steps to ensure the suppliers we engage with adhere to the same standards as APEM. The management of the procurement team, together with the senior leadership team, are all signed up to and actively involved in implementing these standards.

3.2.1. Supplier evaluation

Prior to undertaking any work, our suppliers undergo an evaluation which includes an assessment of their policies and commitment to human rights.

3.2.2. Audits

We shall conduct audits or assessments of suppliers deemed as high risk to ensure compliance with our standards. These audits are conducted by professionally trained auditors.

3.2.3. Corrective actions

Should non-compliance or potential risks be identified, we shall work collaboratively with our suppliers to address issues and implement corrective actions.

3.2.4. Continuous monitoring and improvement

We shall continually monitor and review our performance in preventing modern slavery and human trafficking to measure progress and identify areas for improvement.

4. Risk assessment and management

4.1. Recruitment

A comprehensive recruitment process is part of our commitment to combating modern slavery. This process ensures that our recruitment is fair, transparent, and free from any form of exploitation.

We strictly prohibit the use of forced labour, debt bondage, or any other practices that infringe upon the rights and dignity of individuals seeking employment. We carefully select and engage with reputable recruitment agencies and partners who share our commitment to ethical practices. We conduct thorough due diligence on these agencies and monitor their compliance to ensure they adhere to our strict standards.

Our recruitment process also includes measures to prevent the charging of recruitment fees to candidates, protecting them from potential debt bondage.

We provide ongoing training and awareness programs to our People team and hiring managers to ensure they are well-informed and equipped to identify and address any indicators of modern slavery during the recruitment process.

We encourage all employees to report any concerns or suspicions related to modern slavery, and we guarantee that appropriate action will be taken in a confidential and supportive manner. Through our recruitment processes, we are dedicated to fostering a safe and inclusive work environment for all individuals associated with our organisation.

4.2. Supply chain

To assess the risk of modern slavery within our supply chain, APEM conduct a comprehensive risk assessment, identifying any potential risks related to modern slavery practices. Our procurement team identify the relevant industries and geographic regions where modern slavery is often present and assess the risk of every supplier according to their industry and location.

We are committed to engaging with suppliers who share our commitment to human rights and who can provide safe and fair working conditions. We will only engage suppliers who have passed our due diligence process, targeting the prevention of modern slavery practices and other human rights abuses.

5. Key performance indicators (KPIs)

In case a violation of our Modern Slavery Policy occurs, APEM commit to responding swiftly and taking necessary action based on the gravity of the violation. Collaboration and support will be expected to support any investigations and necessary action will be taken as per the outcome of the investigation.

KPIs are established as part of ongoing monitoring processes. These indicators include supplier compliance, incident reporting rates, and effectiveness of closed corrective actions.

To date, we have had no incidents in relation to modern slavery, but we are committed to the prevention of modern slavery in our operations and beyond. We will identify and address occurrences of modern slavery and human trafficking in our processes and supply chains and uphold the highest human rights standards.



6. Training on modern slavery and trafficking

We are committed to providing training and support to both staff and suppliers to identify and prevent modern slavery practices from our recruitment processes and within our supply chain.

APEM will communicate our expectations to our suppliers, both before signing a contract and continuously throughout the contracting relationship. All contracts feature clauses that require suppliers to comply with our modern slavery policy. Additionally, we will continue a two-way conversation with our suppliers, providing the necessary support and training for identifying and preventing modern slavery practices if required.

APEM will ensure that our employees are fully aware of our modern slavery policies and procedures. We will also provide training to suppliers to increase their understanding of the importance of compliance with our Modern Slavery Policy where required.



This Statement relates to our financial year ended 31 December 2022 and is made in accordance with the UK Modern Slavery Act 2015. It applies to the APEM Group and all its subsidiaries and was approved by the board of directors in June 2023.



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