



# Global Human Trafficking and Modern Slavery Statement

HDR is a global multidisciplinary professional services organization operating in more than 200 locations around the globe. This statement summarizes HDR's policies and practices concerning anti-human trafficking and modern slavery.

## Structure and Supply Chains

Our work is delivered by staff (permanent, temporary, agency, consultants, contractors, sub-contractors) 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.

## 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 ([HDRinc.com external Third Party Code of Conduct](https://www.hdrinc.com/external/ThirdPartyCodeofConduct)) 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 apply 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.

## 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

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 complying with 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. HDR monitors social standards in our supply chain and encourages our suppliers to operate in accordance with the same ethical standards HDR employs.

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"](#) 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.

A handwritten signature in black ink, appearing to read 'John W. Henderson', followed by a horizontal line.

John W. Henderson  
Chief Executive Officer

February 20, 2025