



UK Modern Slavery Statement (FY 2024)

Introduction

HDR Inc. is a global multidisciplinary professional services organization operating in more than 200 locations around the globe in a variety of sectors such as architecture, asset management, engineering, economics and finance, planning and consulting, program management, project delivery, research and environmental sciences.

HDR Inc. has over fourteen thousand employees worldwide and operates in eleven countries. HDR Inc.'s principal subsidiary in the UK is HDR Holdings Limited (Company No. 11829965), which operates nationally and has a number of UK subsidiaries that have a combined annual turnover of £ [70,768,463] (HDR). This statement summarizes HDR's policies and practices concerning anti-human trafficking and modern slavery in the UK.

HDR is committed to improving our practices to combat slavery and human trafficking in our business and supply chain. HDR strives to eradicate slavery and human trafficking from its supply chain by conducting risk-based due diligence on business partners, providing resources and awareness to employees, maintaining and promoting use of an anonymous reporting hotline, and ensuring the tone from the top encourages a culture of integrity and respect for all individuals.

Structure and Supply Chains

Our work is delivered by staff (permanent, temporary, agency, consultants, and subconsultants) and suppliers. Our professional services activities present 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.

Our Business

Our business is organised into the following business units:

Architecture

HDR is committed to designing intelligent and inspiring architecture that expresses our clients' missions and values in areas such as science, education, health, science, urban and community development, and civic and cultural.

Building Engineering Services

Our multidisciplinary engineering, commissioning, building data management, digital and sustainability experts embrace new technologies to be responsive and agile in delivering innovative and elegant solutions to meet client needs in areas such as commercial and real estate, finance, hospitality, tech and data.

Federal

We work in defense and intelligence markets such as civilian agencies, installations, and security.



Resources

HDR provides resilient resource management solutions to address the interdependent social-ecological elements in the industrial, power, and waste arenas.

Transportation

HDR's goal is to develop customized mobility programs designed to improve overall performance in areas such as aviation, freight rail, highways and roads, ports and maritime, and transit.

Water

HDR strives to combine technical innovations with practical solutions by providing services such as source water development, system master planning, infrastructure design and sustainable operations in areas such as conveyance, drinking water, water resource management, fisheries, and wastewater.

Advisory Services and Cross Sector Services

HDR works to assist clients with management consulting services such as right of way, geotechnical, urban planning and design, sustainability and resiliency, strategic communications, and asset management.

Field Services

HDR provides skilled professional construction, environmental, and emergency management staff to work alongside our clients, designers, consultants, and stakeholders.

Our Supply Chains

Our supply chains include: consultants, subconsultants, suppliers, and other third-party vendors, over which HDR is capable of exerting control.

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 Statement and our Code of Business Conduct ([HDRinc.com external Third Party Code of Conduct](https://www.hdrinc.com/external-third-party-code-of-conduct)) 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. During onboarding, our suppliers confirm they are in compliance with our Third Parties' Code of Business Conduct. Both HDR's Anti-Human Trafficking and Modern Slavery Statement and our Third Parties' Code of Business Ethics and Conduct are available 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. HDR reviews and updates all internal policies and external business statements on a regular basis.

Training

All HDR employees undergo training upon hire and annually thereafter, on a myriad of topics including HDR's policies, Code of Business Ethics and Conduct, global anti-corruption and anti-bribery and more. HDR requires additional training for employees in higher risk or unique



regulatory environments. HDR also has an internal "Ethics Moments" video series which provides employees with guidance on how to handle ethically challenging situations. HDR assesses the adequacy and scope of all internal trainings on a regular basis.

Due Diligence and Risk Assessment

We understand that the following areas give rise to the highest modern slavery risks: operations and procurement on a global scale, geopolitical differences, labor shortages, lack of reporting mechanisms or tracking of metrics in certain countries or regions, and lack of transparency in certain countries or regions.

As part of our initiative to identify and mitigate risk HDR instituted policies and procedures, an audit process and internal controls, an anonymous reporting hotline, trainings, and compliance requirements for various business partners. Any violations of our Supplier Code of Conduct or failure to cooperate in an audit or investigation may jeopardize a supplier's business relationship with us, up to and including termination of contracts. HDR's Anti- Human Trafficking and Modern Slavery Policy also contains website links to local laws, along with phone numbers and e-mails to assist employees with accessing grievance mechanisms and reporting suspected incidents of modern slavery to the proper authority.

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 applying HDR's Code of Business Ethics and Conduct and Anti-Human Trafficking and Modern Slavery Policy. In addition, HDR's standard contracts stipulate that suppliers will comply with all applicable laws, rules and regulations including those related to human trafficking, worker welfare and modern slavery.

HDR utilizes a risk-based due diligence process to assess business partners 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 risks. Parties flagged for risk receive further scrutiny. This due diligence process has resulted in HDR electing not to do business with certain parties. Due diligence is performed at the pre-contractual stage and HDR's due diligence tool includes a continuous monitoring function to ensure HDR's decision-making is current. HDR assesses the adequacy and scope of its third-party due diligence screenings on a regular basis and engages employees for their feedback on the effectiveness of policies, programs, and initiatives through surveys and other mechanisms.

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. We have zero tolerance for slavery and human trafficking. To ensure all those in our supply chain comply with our values and ethics we have in place supply chain compliance requirements outlined in our Third-Party Code of Business Conduct. The Third-Party Code of Business Conduct also allows HDR to audit such third party or appoint a third party to conduct an audit. Any violations are reported to HDR and the third party's



management for appropriate corrective action. Information for the Integrity in Action anonymous hotline reporting is also included.

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](#)" Hotline for such purposes. All "Integrity in Action" hotline reports are investigated, and appropriate actions taken. Additionally, consistent with our Speaking Up/Anti-Retaliation Policy, any HDR party or HDR third party who, in good faith, reports suspected legal, ethical or policy violations will not suffer any adverse consequences for doing so.

Internal control systems and procedures are subject to regular audits to provide assurance that they are effective in countering Human Trafficking and Modern Slavery.

Further Steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking: continue to refine and update our policies, procedures, and internal controls to target noncompliance and promote awareness of activities indicative of slavery and human trafficking; continue to monitor and take appropriate action to reports made through our anonymous hotline; and continue to promote a culture of integrity and respect for all individuals.

HDR seeks input from employees at all levels worldwide to help shape its strategic plan, which sets out what we aspire to achieve over the next five years and defines our vision for the future and the steps we will take to reach it. A cornerstone of this plan is our commitment to doing things right to make great things possible. While the future cannot be predicted, HDR uses the plan as a guide and actively monitors progress year over year toward achieving its short-, medium-, and long-term goals.

This Statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes HDR's slavery and human trafficking statement for the financial year ending December 31, 2024. This Statement has been reviewed and approved by the Board of Directors on December 20, 2025.

A handwritten signature in blue ink, appearing to read 'Neil Graff', with a stylized flourish at the end.

Neil Graff
HDR Holdings Limited
January 30, 2026