

MODERN SLAVERY POLICY

November 2020

OUR COMMITMENT

SYSTRA Limited has zero tolerance towards slavery, servitude, forced or compulsory labour and human trafficking (modern slavery), and any violation of, and crime against fundamental human rights. This statement is made in relation to the Modern Slavery Act 2015 and sets out SYSTRA Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

SYSTRA Ltd. recognises it's responsibility to take a robust approach to slavery and human trafficking. This policy statement covers all activities of SYSTRA Ltd. The scope of our business has been defined as:

"The provision of engineering (project, programme and design services for metros and LRT, conventional rail and high-speed rail) and consultancy services (transport consultancy, social research, software services, studies, planning, design, construction supervision, verification & commissioning, training) in the fields of urban and railway transportation, civil infrastructures, buildings, urban & regional planning related to the UK and Ireland public and private sector markets"

Our supply chain consists of other professional service providers acting primarily as subconsultants together with suppliers of services and equipment to our offices.

SYSTRA Ltd. primarily operates in the United Kingdom and the Republic of Ireland with some occasional project work in overseas locations.

We consider our business activities to be low risk in relation to slavery and human trafficking, however through continual review and assessment of our current and new suppliers we will identify any areas where there may be higher risks.

POLICIES AND PROCEDURES ON SLAVERY AND HUMAN TRAFFICKING

The following policies describe SYSTRA Ltd. approach to the identification of modern slavery risks and the steps taken to prevent slavery and human trafficking in our operations:

Corporate Social Responsibility

Social responsibility is an intrinsic element of our business decisions and culture in the UK and

Ireland; globally, the SYSTRA Group General Policy summarises our core values supported by 12 social responsibility commitments.

Ethics and Compliance Programme

- SYSTRA Group Business Ethics and Compliance Policy and the SYSTRA Ltd. Anti-Bribery Policy summarise our values, objectives, and commitments designed to ensure that we maintain SYSTRA Ltd. reputation and conduct our business with integrity.
- SYSTRA's Code of Ethics and Anti-Corruption Code of Conduct set out our commitment to act ethically and with integrity in all our business relationships.

We require our colleagues to obey the law, observe regulations and guidelines and, irrespective of geographical location or position, remember that ethics, integrity, and loyalty in business practice and respect for others are not negotiable and not open to compromise.

We have sought to embed the Code of Ethics and Anti-Corruption Code of Conduct across SYSTRA Ltd. through compulsory online training for all colleagues.

- Our corporate ethics and compliance initiative also involve mandatory procedures and tasks designed to build and strengthen SYSTRA Ltd's culture and reputation for integrity, such as the Business Partners Due Diligence procedure, and the Ethics Alert Process.
- The SYSTRA Business Partner Questionnaire requests information to verify that supply chain partners operate in a manner consistent with our core values on ethics, quality, safety, integrity and sustainability.



MODERN SLAVERY POLICY

November 2020

EQUAL OPPORTUNITIES AND DIGNITY AT WORK

Our values and vision are core to the policies which colleagues are expected to adhere to in relation to their employment. Particularly relevant policies and procedures include:

- The Equality, Diversity and Inclusion Policy set out our commitment to create a work environment free of harassment and bullying, where everyone is treated with dignity and respect
- The Grievance Policy provides a route for all employees to raise concerns within the workplace in a constructive and supportive manner.
- The Whistleblowing Policy and Procedure provides colleagues, agency workers and contractors with confidential access to raise any concerns that they may have about the interests of the organisation, of others, or any instances of malpractice within SYSTRA Ltd.

CONTINUOUS IMPROVEMENT

SYSTRA Ltd. is committed to continuous improvement in all its operations. As our approach to identifying and combatting modern slavery and human trafficking continues to improve, we will implement key performance indicators to enable us to monitor and measure our performance in this important area.

This policy is communicated to all colleagues and organisations working for SYSTRA Limited or on our behalf.

This policy is reviewed annually by the SYSTRA Limited Management Board and is available to interested parties upon request.



Nick Salt
CEO

SYSTRA LIMITED - UK & IRELAND

December 2020