Our vision at Hatch, as stated in our Manifesto, is that we are passionately committed to the pursuit of a better world through positive change. Our Manifesto also includes our values, which guide everything we do and are integral to how we express ourselves as a group. Based on these values, Hatch has built an unwavering and strong reputation for conducting business with integrity, earning the respect and trust of our clients, employees, and the communities in which we work.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

One of our core values at Hatch is achieving no harm. We believe that to achieve no harm in relation to modern slavery, we have a responsibility to continuously work with organisations in our supply chain to identify modern slavery risks and eliminate them.

About Hatch

The Hatch group of companies is an employee-owned, multidisciplinary professional services firm that delivers a comprehensive array of technical and strategic services, including engineering, consulting, information technology, process development, project and construction management, and procurement services to the metals, energy, and infrastructure sectors. Hatch has served clients for over six decades and has project experience in over 150 countries.

As a global group of companies, Hatch is committed to ensuring there is transparency not only in our own business but in our approach to tackling modern slavery in our supply chains. This statement addresses Hatch’s obligations for its reporting entities required by the UK Modern Slavery Act 2015\(^1\) and the Australian Modern Slavery Act 2018\(^2\).

Risks of Modern Slavery in the Operations and Supply Chains of Hatch

For our employees and contractors that Hatch directly employs or engages, Hatch has assessed the risks of modern slavery as very low. Whilst we operate in some jurisdictions that are at a higher risk for modern slavery, the majority of our workforce are permanent employees that are employed on contracts with standard terms allowing the employee to terminate their employment on notice and all employees are paid at or above the relevant minimum wage in their jurisdiction. Where we engage recruiters to assist in the recruitment of contract employees for our large projects, we comply with all applicable local laws. We allow our contractors to terminate their contract on notice and all contractors are paid at or above the relevant minimum wage in their jurisdiction and in accordance with all applicable local laws.

Hatch’s supply chain consists of the following:

- Subconsultants to support the professional services we provide
- Goods and services that support our operations, such as office leases, utilities, IT hardware and software, office equipment, marketing material, stationary supplies, catering and cleaning services, and personal protective equipment
- Procurement that we perform as agents for and on behalf of our clients
- Procurement for Hatch-supplied technologies.

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1 Registered in England, Company No. 02425546. Registered Office: 4th Floor 20 St Andrew Street, London EC4A 3AG, United Kingdom

2 This Statement constitutes Hatch’s slavery and human trafficking statement for the previous financial year (ending 30 September 2020) and is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and Section 13 of the Australian Modern Slavery Act 2018. As required by the Australian Act, this Statement covers the entities Hatch controls in the Australia - Asia region and these entities are: Hatchcos Holdings Pty Ltd, Hatch Pty Ltd, Hatch Roberts Day Holdings Pty Ltd (ACN 131 779 001), Hatch Roberts Day Pty Ltd (ACN 008 892 135), Hatch Pte Ltd, Hatch Associates India Private Limited, Hatch Project Consulting (Shanghai) Co. Ltd, Hatch Engineering (Shenyang) Co. Ltd, Hatch Nuttall Engineering Pty Ltd, Hatch Consulting (Malaysia) Sdn Bhd, Hatch Nouvelle-Caledonie SARL, Hatch Engineering and Consulting (Russia) LLC, Hatch LTK Australia Pty Ltd, LTK (Jilin) Rolling Stock Technology Consulting Co., Ltd, LTK Hong Kong Limited, Hatch Ingenieros Y Consultores Limitada and Hatch-CISDI International Engineering & Consulting Co. Ltd and Hatch-CISDI Engineering (Shanghai) Co. Ltd.
There is the potential for there to be modern slavery risks in Hatch’s supply chain and Hatch has and is implementing the actions outlined below to manage this risk.

**Policies and Actions in Relation to Slavery and Human Trafficking**

Our employees are expected to abide by our Code of Conduct, which helps to create a culture that fosters transparency, as it empowers our people with the correct tools to avoid, identify, and respond to all ethics-related issues. Our suppliers, contractors, consultants, and business associates working under Hatch’s direction, in addition to joint-venture partners, are expected to have read, understand, and comply with our Code of Conduct. Our Code of Conduct applies to all persons working for us or on our behalf in any capacity, including employees at all levels: directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

Hatch has produced an internal process guide with respect to Worker Welfare (The Worker Welfare Guide) that addresses many of the key issues within the UK and Australian Modern Slavery Acts. The Worker Welfare guide ensures that contractors in our supply chain with whom we work on projects hold an equal regard for the health, safety, and welfare of the project workers to promote a healthy environment for workers, and further improve project delivery, quality, safety, and sustainability outcomes for our clients. This Worker Welfare Guide is to be adopted across all Hatch projects, with a particular focus on our large projects in high risk jurisdictions, and is complementary to this Modern Slavery Act Statement.

We expect the same high standards from all our contractors, suppliers, and other business partners and, as part of our contracting processes, have introduced specific prohibitions against the use of forced, compulsory, or trafficked labour. We expect that our suppliers will hold their own suppliers to the same high standards and have introduced contractual provisions requiring our suppliers to conduct due diligence of their supply chain.

In the Australian region, Hatch is requesting key existing suppliers to complete a vendor self-assessment questionnaire on modern slavery risks. Going forward, for all new subconsultants and good and services suppliers, Hatch will introduce the requirement that this self-assessment questionnaire be completed, and the questionnaire reviewed as part of our due diligence process of assessing whether to do business with the relevant company.

Where Hatch is performing procurement services on behalf of our clients, we are often using our clients’ systems and processes for identifying modern slavery risks. Hatch has and will continue to provide training to our procurement teams on modern slavery risks to enable our procurement teams to recommend if any of our clients’ systems and processes could be improved for assessing modern slavery risks.

**Responsibility for the Policy**

The UK and Australian directors have overall responsibility for ensuring this statement complies with our legal and ethical obligations, and that all those under our applicable control comply with it. Management at all levels are responsible for ensuring those reporting to them understand and comply with this statement and are given adequate and regular training on it and the issue of modern slavery in supply chains.

**Compliance with the Policy**

Our employees are expected to understand and comply with this statement and our Code of Conduct. The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might lead to, or even suggest, a breach of this policy. Employees must notify, as applicable, the relevant HR business partner as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If an employee believes or suspects a breach of this policy has occurred or that it may occur, they must notify their applicable HR business partner or report it in accordance with our Hatch Code of Conduct hotline as soon as possible. Where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains. Where a supplier will not engage in a remediation process to address modern slavery or Hatch considers that it is not appropriate to continue business dealings with the supplier, Hatch will end the business relationship.
Communication and Awareness of this Policy

Training on this policy and on the risk our business faces from modern slavery in its supply chains forms part of the induction process for all individuals who work for us and is provided as necessary. Our commitment to addressing the issue of modern slavery in our business and supply chains is to be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

John Bianchini
Chairman & CEO, Hatch
March 2021