

**Policy Statement**  
**on respect for human rights and environmental**  
**standards under the German Supply Chain Due**  
**Diligence Act (“LkSG”)**

**Our commitment to respect human rights and**  
**corresponding environmental standards**

13th December 2023

## Contact

### COMPLIANCE DEPARTMENT

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Arcadis recognizes its social responsibility and is particularly aware of its responsibility as a company to uphold human rights and related environmental standards. Our Global human rights and labor policy reflects our commitment to respecting internationally recognized human rights when conducting business and addresses our own operations, supply chain, projects, services, solutions, and clients. Further information on our commitment to respect human rights and related environmental standards can be found in our [Global human rights and labor policy](#).

This LkSG statement expands the Global Arcadis human rights and labor policy, with reference to the additional legal requirements arising from the German Act on Corporate Due Diligence Obligations in Supply Chains.

We are committed to the standards mentioned in the LkSG, in particular:

- International Labor Organization (ILO) Convention No. 29 concerning Forced or Compulsory Labor.
- Protocol of June 11, 2014 to ILO Convention No. 29 concerning Forced or Compulsory Labor.
- ILO Convention No. 87 concerning Freedom of Association and Protection of the Right to Organize
- ILO Convention No. 98 concerning the Application of the Principles of the Right to Organize and to Bargain Collectively
- ILO Convention No. 100 concerning Equal Remuneration for Men and Women Workers for Work of Equal Value
- ILO Convention No. 105 concerning the Abolition of Forced Labor
- ILO Convention No. 111 on Discrimination in Respect of Employment and Occupation
- ILO Convention No. 138 on the Minimum Age for Admission to Employment
- ILO Convention No. 182 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- Minamata Convention on Mercury
- Stockholm Convention on Persistent Organic Pollutants, as last amended by decision of May 6, 2005
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, as last amended by the Third Ordinance Amending Annexes to the Basel Convention of May 6, 2014

### **Our approach to implementing human rights and environmental due diligence**

To comply with the LkSG, this LkSG statement, our Global human rights and labor policy and other Arcadis Group policies,<sup>1</sup> we will carry out annual and ad hoc risk analyses in our own business area and at direct suppliers. In the case of indirect suppliers, we will carry out ad hoc risk analyses if we have substantial knowledge that a human rights or environmental rights related violation appears to be possible. Protecting human rights and corresponding environmental standards is a continuous process for us. To meet our due diligence obligations, we examine the potential and actual impact of our business activities on human beings and the environment. For this purpose, we have established a risk management process that enables us to identify, weigh and prioritise relevant risks and, if necessary, take appropriate measures, as well as to recognise those groups that are potentially impacted by our business activities through our direct and indirect business partners in the supply chain. We will document all identified risks in our annual reports, starting with the 2024 financial year.

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<sup>1</sup> Our global human rights and labor policy and this LkSG Statement complement the human rights-related statements in other Arcadis standards and policies. These related policies are as follows: [Arcadis Global Business Principles \(AGBP\)](#), [Global Sustainability Policy Statement](#), [Procurement Policy](#), [Supplier Code of Conduct](#) and [Global Privacy Notice](#).

### Risk management and responsibilities

Responsibility for the implementation of the obligations of the LkSG is managed by our senior management, the heads of our business units, the heads of our corporate divisions and the heads of corporate functions, who accept and assume this responsibility. We have a risk management system in place consisting of guidelines and instructions for the management and the units/divisions involved in the implementation and the supervision of human rights and environmental rights related risks. This ensures that each area of our company is aware of its own responsibility for compliance with human rights and environmental obligations and their implementation on a day-to-day basis. To support and monitor our due diligence requirements and processes, the Board of Management of Arcadis Germany appointed

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as Human Rights Officer and person responsible for compliance with the LkSG in 2023. The Board of Management will be informed at regular intervals and on an ad-hoc basis on measures that have been implemented to comply with LkSG.

### Preventive and remedial measures

In order to avoid, minimise or end human rights and environmental risks, we have introduced preventive and remedial measures, the effectiveness of which we review annually and on an ad hoc basis and update as necessary.

Preventive measures are in particular:

- We will communicate this LkSG Statement regularly and raise awareness and inform our employees and partners.
- We will provide specific training to our employees on human rights and related environmental issues.
- We maintain a digital reporting channel to which our employees and external stakeholders can report suspected violations of the LkSG anonymously and free of charge, either verbally or in writing in many different languages. We also operate an Integrity Line where internal violations of guidelines and laws can be reported - also anonymously.
- We regularly update our code of conduct, AGBP, and train our employees on it on a regular basis.

We expect our employees to comply with our Code of Conduct and support us to the best of their ability in order to appropriately prevent and, if necessary, end or minimise the human rights and environmental risks.

We also expect our direct suppliers to comply with our Code of Conduct for Suppliers, respect human rights and environmental obligations in accordance with the LkSG and other national and international human rights instruments, to address them appropriately in the supply chain, and to support us in fulfilling our due diligence obligations.

If we identify a violation of human rights or environmental obligations that has occurred or is imminent, we will take appropriate remedial action without delay. If immediate cessation, prevention or minimisation is not possible, we will prepare and implement a concept for termination or minimisation with a specific timetable.

To date, we have not identified any imminent or actual violation of human rights or environmental obligations. Accordingly, we have not yet had to take any remedial measures.



**Grievance mechanism**

We have set up a complaints procedure for our employees and external stakeholders to report actual and potential violations of human rights and corresponding environmental standards in accordance with the LkSG within our company and our supply chain anonymously and confidentially, either verbally or in writing via the Reporting Channel. The rules of procedure and instructions for reporting via the Reporting Channel can be found on our website.

**Reporting**

From financial year 2024 onwards, Arcadis Germany will document and report annually to the German Federal Office for Economic Affairs and Export Control. The annual reports will also be available on the Arcadis Germany website for a period of seven years.

Darmstadt, 13.12.2023

Signed Markus Reppenhagen  
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Managing Director

Signed Dr. Birgit Guhse  
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Managing Director

Signed Michael Hanita  
.....  
Managing Director

Signed Niels Schallenberg  
.....  
Managing Director

## About Arcadis

Arcadis is the leading global planning and consulting firm for the natural and man-made environment. By pooling local knowledge worldwide and combining our expertise with the latest digital achievements, we achieve outstanding and sustainable results for our clients and their customers. We are 36,000 people operating in more than 70 countries, generating revenues of €4.2 billion (based on pro forma figures for the full year 2021). We support UN Habitat with knowledge and expertise to improve the quality of life in fast-growing cities around the world.

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