

***Fighting Against Forced Labour and Child Labour in Supply Chains Act* report**

Reporting Entities

This statement is made in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) on behalf of Arcadis Canada Inc., Arcadis Professional Services (Canada) Inc. and Arcadis Architects (Canada) Inc. (“Arcadis Canada”) for the financial year ended December 31, 2025.¹

Organizational Structure

Arcadis Canada is part of a global consultancy which is ultimately owned by Arcadis NV, a Dutch listed company. Further information on our Canadian business can be found on our website [here](#).

Supply Chains

The supply chain of Arcadis Canada comprises:

- Other professional service organizations and individuals with whom we work to provide services to our clients, including architects, engineering companies, planners, surveyors, digital service providers and other professional advisors; and
- Suppliers of products and services for our corporate operations, including insurance, legal and financial advisors, software and technology providers, stationery and materials.

Policies and Governance

Arcadis General Business Principles (AGBP)

Arcadis conducts its business in accordance with our global code of conduct, the AGBP, which reinforces our commitment to respect human rights. The AGBP define our values and the interpretation of business ethics and provide guidance for business decisions and actions by Arcadis Canada throughout the world.

Global Human Rights Policy

Arcadis confirms its commitment to following international standards as outlined in the United Nations Guiding Principles on Business and Human rights (UNGPs) and the company’s responsibility to respect human rights and to prevent, mitigate and remediate adverse human rights impacts that may be directly or indirectly caused by its activities.

The Human Rights policy addresses:

1. our own operations, comprising our offices, our employees, and our contingent workforce.
2. our direct and indirect supply chains, covering the people that work in these supply chains, as well as in the supply chains of our business partners; and

¹ Arcadis acquired IBI Group in 2023. IBI Group Professional Services (Canada) Inc. changed its name to Arcadis Professional Services (Canada) Inc. on April 25, 2023, and IBI Group Architects (Canada) Inc. changed its name to Arcadis Architects (Canada) Inc. on April 20, 2023.

- our projects, services, solutions, and clients (including the people) as well as in the value chain of our business partners, including those that are affected by our projects, services, solutions or clients, e.g., residents in surrounding communities.

The policy explicitly prohibits forced and child labour, worker paid recruitment fees, retention of identity documents, compulsory overtime, and any form of intimidation or restriction on freedom of movement or association.

The Human Rights policy also presents the assessment of Arcadis' most salient human rights risks, modern slavery being one of the 9 most salient focus areas:



Global Supplier Code of Conduct

Our suppliers are expected to commit and observe our Global Supplier Code of Conduct, which aligns with our Human Rights Policy and the internally recognised frameworks and standards referenced. This code establishes clear environmental, social and governance requirements for all suppliers and contractors. Through the Global Supplier Code of Conduct, suppliers agree to provide appropriate working conditions for supply chain workers, combat child labour, forced labour, human trafficking and discrimination.

We aim to collaborate with first-tier suppliers with whom we have a direct contractual relationship, and we expect them, via our Supplier Code of Conduct, to uphold and actively cascade the same standards within their own supply chains.

Seek Advice and Speak Up Policy Statement

The Seek Advice and Speak Up Policy sets out the available reporting channels for raising concerns about unethical practices including modern slavery. It also provides a confidential and anonymous reporting line which is available to all employees as well as to third parties.

UN Global Compact (UNGC)

Arcadis has been a member of the UN Global Compact (UNGC) since 2009 and is committed to its objectives and to the ten universal principles regarding human rights, labour standards, environmental stewardship and anti-corruption.

We previously reported on the activities of the Arcadis Modern Slavery Working Group (“MSWG”).² As indicated in our last report, the MSWG is tasked with:

- Overseeing disclosure in accordance with modern slavery laws;
- Establishing a governance and management system;
- Developing and implementing risk-based due diligence for employees/contract workers, suppliers, and clients/projects;
- Defining protocols for remediation if links to forced or child labour are found;
- Delivering tailored modern slavery training to staff, and
- Developing key performance indicators of modern slavery efforts.

The membership of the MSWG includes our human rights experts alongside business area representatives, including personnel from Arcadis Canada.

Due Diligence and Risk Assessment Across our Value Chain

Own Operations: As a professional services business, we consider the risk of modern slavery occurring within Arcadis Canada’s employee population to be low. Nevertheless, our recruitment process usually includes a two-stage interview process which is carried out virtually by the Talent Acquisition Team and relevant Project Hiring Manager. This process is designed to see that prospective employees share our values and behaviours and have the necessary competencies to carry out the role as well as to confirm that the prospective employee has applied to work with us of their own free will. In addition to this we also undertake right to work checks, and employment is conditional on them having the legal right to work in Canada.

Projects/Clients: Although the Canadian market may present low risk for modern slavery, Arcadis recognizes that certain sectors within Canada may present higher risks. In 2025, the MSWG engaged in a sector-mapping exercise to identify which of the sectors in which we do business carry the highest risk for modern slavery. In 2026, the MSWG will continue to work on defining a risk-based due diligence approach for project work in Canada.

Supply Chain: Arcadis Canada acknowledges that there may be risks of modern slavery within our supply chain arising primarily from:

- purchase of commodities, products and services for use in operations or projects, particularly where the supply chain may utilize unskilled labour (for example, supply of office goods), where the supplier is in countries with weaker legal protections and/or higher rates of modern slavery or where the supplier is active in a sector with higher rates of modern slavery;
- any failure of our partners, subconsultants, contingent workers or suppliers to comply with our Supplier Code of Conduct, including in relation to modern slavery, and

² Last year, we reported on the activities of the Canadian Modern Slavery Working Group. Since our last report, we have modified the working group to be global in composition to reflect the international nature of our work.

- entry into new services and contracting models where we may have less visibility of the supply chain or project context.

We are continuously working to improve our supplier due diligence processes. We have implemented the following measures:

- **Identified our high-risk areas**

To better identify high-risk areas related to human rights, including modern slavery, within our supply chain, we collaborated with external human rights experts to develop a Sustainability Risk matrix. This matrix evaluates various factors, such as the supplier's services and operational locations. By combining insights from the matrix with our ESG (Environmental, Social, and Governance) screening tools, we have been able to pinpoint high-risk purchasing categories, countries where we operate, and vulnerable groups, such as migrant workers. Our higher-risk categories include construction, IT hardware, and materials.

- **Pre-qualification questionnaire and Supplier Code of Conduct**

Suppliers active in high-risk areas undergo a due diligence process that is increasingly centralized via our prequalification questionnaire and screening tools. Commitment to the Supplier Code of Conduct is required in the prequalification questionnaire and our general terms and conditions, which are also references in our purchase orders. For example, through our Supplier Code of Conduct, suppliers agree to provide appropriate working conditions for supply chain workers and combat child labour, forced labour, and human trafficking. To facilitate the understanding of our Supplier Code of Conduct, a concise training module for suppliers is provided online.

In 2025, Arcadis developed ESG contractual clauses, including modern slavery clauses, for embedding ESG considerations into our contractual agreements with suppliers and contractors. We are currently in the process of embedding these clauses into our supplier contract templates.

- **ESG screening & monitoring tool**

To support effective oversight of our supply chain, we continue to utilize an ESG and monitoring system. This tool enables us to continuously monitor and assess all suppliers active in high-risk areas, helping us identify potential human rights issues, including modern slavery, across the industry and our supply chain.

The tool leverages digital technology to analyze supplier activities, assess risks, and flag potential incidents in real-time. By focusing on suppliers operating in high-risk industries and countries, the tool provides valuable insights that allow us to act swiftly to address any identified risks. This approach helps us ensure compliance with our Supplier Code of Conduct and uphold our commitment to ethical and sustainable practices.

- **Know Your Third Party screening**

As third-party organizations and vendors deliver more business processes and services, oversight becomes more complex. We continue our phased implementation of a Global KY3P Centralised Screening Programme ("Know Your Third Party") which has been designed to screen certain categories of new third parties for defined risk areas. KY3P offers solutions, informed by global regulations and best practices.

Monitoring and Reporting

Arcadis Canada manages risks of modern slavery through the AGBP, referred to above, the Arcadis Integrity Line (both internal and external), and the Canada Compliance Committee.

Arcadis Canada provides access to both internal and external Integrity Lines which are available not only to employees but also to suppliers, clients, value chain workers, local communities and other third parties and which are hosted by an independent third party. This provides for reporting of actual or suspected breaches of the AGBP including anonymously if requested.

Arcadis Canada also has a legally qualified Compliance Officer whose responsibilities include monitoring compliance with the AGBP. The Compliance function is in turn supervised by a Canadian Compliance Committee. Actual or suspected breaches of the AGBP may be reported directly to the Canada Compliance Officer if employees are not comfortable raising such issues with their line manager, or through the Integrity Line.

Remediation

Arcadis Canada has not identified any modern slavery in our activities or supply chains during FY 2025. Accordingly, no remediation measures have been taken in this area.

Similarly, Arcadis Canada has not identified any circumstances in which vulnerable families have experienced loss of income as a result of steps Arcadis Canada has taken to eliminate modern slavery risks during FY 2025. Accordingly, no remediation measures have been taken in this area.

Training

Our AGBP refers to our Human Rights Policy, which includes modern slavery as a salient human rights issue. Arcadis Canada employees are required to complete online training about the AGBP as part of their onboarding and an annual mandatory refresh training.

As previously reported, in 2023 Arcadis Canada employees were provided access to two online human rights trainings: An Introduction to UN Guiding Principles on Business and Human Rights, and An Introduction to Modern Slavery. In 2024, an online learning module pertaining to sustainable procurement containing a dedicated human rights section that places specific emphasis on modern slavery risks within the construction industry was also made available to all Arcadians.

In 2025, the MSWG explored whether there were ways to strengthen our training on modern slavery. As a result, we developed a more in-depth version that is now finalized and is anticipated to be deployed in 2026. The learning objectives are as follows:

- Explain what modern slavery is and why it matters
- Recognise three prevalent forms of modern slavery:
 - Forced labour
 - Human trafficking
 - Slavery and slavery-like practices
- Examine ways to identify and address modern slavery risks in Arcadis' operations and projects

It contains a series of definitions, videos, knowledge-checks, case studies, exercises and practical resources, both internal and external, to better identify, prevent and mitigate modern slavery risks.

Future Activities

We plan to make enhancements to our approach to modern slavery in Canada on a continuous-improvement basis, and consistent with the *Act*, will report next year on progress made.

Attestation

In accordance with section 11(4)(b)(i) of the *Act*, this report was approved by Scott Arbuckle on behalf of Arcadis Canada Inc., Arcadis Professional Services (Canada) Inc., and Arcadis Architects (Canada) Inc.



Scott Arbuckle