

## ANTI BRIBERY, MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### Our Commitment

At Omnium International, we are committed to preventing modern slavery and human trafficking in our operations. We are dedicated to protecting our people from any form of modern slavery and human trafficking by promoting our core values: Safety, Integrity, Collaboration and Innovation.

We do not tolerate any form of bribery, forced labour, slavery or human trafficking in any part of our business. As a signatory to the UNGC, we are committed to implementing internationally recognized best practices. This includes adhering to the sixth principle that addresses working conditions and human rights.

Our Code of Conduct and Supplier Code of Conduct specifically prohibit human trafficking as well as child and forced labour. All personnel must abide by our Code. In terms of our operations, our sustainable business strategy is aligned with the UN Sustainable Development Goals. Our mission is to do business while taking into consideration the economic, social and environmental realities in different countries around the world.

The success of this policy can only be achieved through teamwork, dedication and commitment by all our staff members. We are committed to aiming for excellence and to accept nothing less. This policy is communicated and made available to all our interested parties.

*P. Westeng*

**Peter J Westeng, BSc. FRICS**  
Chairman



# MODERN SLAVERY

Modern Slavery is the illegal exploitation of people for personal or commercial gain. Victims are trapped in servitude, which they were deceived or coerced into, and cannot leave.

## MODERN SLAVERY INCLUDES:

SEXUAL  
EXPLOITATION



CRIMINAL  
EXPLOITATION



FORCED  
LABOUR



DOMESTIC  
SERVITUDE



## **Business Overview**

Omnium International are an independent Chartered Quantity Surveying firm, headquartered in Dubai, United Arab Emirates and has worked internationally for over 50 years. The Omnium International Group contains five established international offices, located in Dubai (UAE), Abu Dhabi (UAE), Jeddah (KSA), Riyadh (KSA) and London (UK).

Omnium International's mission is to be a trusted cost partner, delivering outstanding client service. Our clients rely on us to support projects of all sizes, understanding that they will receive advice tailored to their budget from a hands-on team that works alongside them, building lasting, long-term partnerships.

Omnium International maintains high standards for health and safety, integrity, and environmental protection. The company is committed to delivering quality projects on budget and on schedule to the complete satisfaction of its clients.

We endeavour to play our part to reduce any modern slavery and human trafficking risks that may be present in any of the project teams that we are working with. We strive to be reliable partners in our clients' own efforts to fight modern slavery and human trafficking, whenever we advise them, or act on their behalf on procurement matters. Every member of the Omnium team strictly adheres to the following policies and governances:

### **1. Code of Conduct**

Our Code of Conduct sets the standards of how we work together for or on behalf of Omnium International. This important document articulates our values and includes a section dedicated to modern slavery. We aim to maintain high ethical standards in the conduct of our business. As a result, compliance with the Code of Conduct is mandatory for all personnel: it is a condition of working with us.

### **2. Compliance**

Considering that our personnel are the front-line agents in the application of our Integrity value, we have a Compliance Procedure operationalizing the principles laid out in our Code of Conduct. These principles relate to anti-corruption and bribery, facilitation payments, antitrust, political contributions, gifts & hospitality, duty to report and how we deal with business partners

### **3. Sustainability**

We put sustainability at the heart of our corporate and project activities and business strategy. In that sense, every year we commit in our Sustainability Statement to conduct business activities in a way that is beneficial to society and global and local economies. Therefore, our Sustainable Business Strategy is aligned with the UN Sustainable Development Goals. We also help clients to address the global, local, social and economic impacts, opportunities and risk associated with their projects.

### **4. Suppliers**

We commit to undertake business with integrity and expect our suppliers, subcontractors and consultants to respect and adhere to our values and high ethical standards of conduct. The Supplier Code of Conduct summarizes Omnium's expectations and governing principles, including those

## 5. Procurement

We strive to be competitive, yet fair and ethical in our business practice. To ensure the effectiveness of the process, the company has implemented a procurement policy that our personnel must follow. The policy communicates Omnium's procurement principles and rules and contributes in creating and maintaining effective supply chain management capabilities, processes and systems. To ensure the transparency of the process, the company also makes all governance documents available to all employees. Relevant governance documents include the Purchasing Management Procedure, Vendor Integrity Verification Procedure and Project Risk Identification work instruction which set out the necessary precautions to be taken to avoid modern slavery and human trafficking:

## 6. Human Resources

We also have human resources governance documents to protect our personnel and potential personnel from modern slavery and human trafficking. These include: The Human Resources Policy and Workplace Discrimination, Harassment and Violence Procedure.

## **DUE DILIGENCE - SUPPLIERS AND OTHER THIRD PARTIES**

At Omnum International, we expect third parties we work with to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. Before making any commitments towards third parties, we take steps to appropriately evaluate the relationship and mitigate any associated risks by carrying out due diligence as may be dictated based on the risk level:

Our 360° Integrity Check verifies if the third party is listed on international data sources, has a history of corruption, collusion, fraud or labour/human right issues, is a state-owned entity or politically exposed person, or appears on Omnum's Reference List in order to take the appropriate mitigating measures.

- The Vendor Integrity Verification process is an integral part of Omnum's Integrity program. It uses multiple tools to ensure vendors are ethical through a rigorous screening and ongoing monitoring process.
- All clients for international projects undergo an Integrity Check. If there are any findings a prior review and endorsement by an Integrity Officer is required, as well as approval up to the Managing Director.
- Suppliers are required to accept integrity-related contractual provisions and adhere to our Supplier Code of Conduct.

## **RISK ASSESSMENT AND MANAGEMENT**

We undertake risk assessments to determine where our operations present a higher risk of modern slavery and human trafficking. Where we identify higher risks, we implement mitigation measures (e.g. enhanced due diligence).

Significant risk is known to reside in the use of blue-collar workers, something that is common in our industry and indeed in our own operations. The risk is compounded in the case of migrant workers. We have mapped out our use of such workers on our worksites, by country of origin (where applicable) and country of deployment and compared that against indices such as the Global Slavery Vulnerability Score, the Global Slavery Prevalence Index and the Human Freedom Index. A number of countries have thus been identified as requiring heightened attention from our perspective, and our efforts are guided accordingly.

## **TRAINING AND AWARENESS**

Every year, Omnum personnel at all levels are required to complete a mandatory certification process to ensure that our Code of Conduct is understood and properly applied to our daily activities. We ensure awareness of our Code of Conduct and values by providing timely information by various means such as onboarding presentations, posters, and during daily meetings. Pictograms have specifically been developed to aid understanding and knowledge of the principles covered by the Code of Conduct.

The modern slavery and human trafficking toolbox (which includes posters and a facilitation guide) provides our workforce with a summary of our modern slavery and human trafficking principles, giving real life examples and advising how to report any suspected or known violations.

To ensure a good understanding of the risks of modern slavery and human trafficking in our supply chains and business, we provide additional training for personnel in key positions. Our training actively explains human trafficking, how to recognize it, and proposes compliance strategies to use internally and throughout the supply chains. Every member of our board of directors has completed it as part of their onboarding. It is also available to all our employees and each manager may, at their discretion, assign it to their employees.

In addition, the company's board of directors and top executives attended an in-person presentation aimed at raising their awareness and giving them an understanding of modern slavery and human trafficking issues, given by outside counsel specializing in the topic.

### **DUTY TO REPORT**

At Omnimium, all our personnel have a duty to report any known or suspected violation of our Code or any governance documents, as well as any violation of applicable laws, rules or regulations. That requirement is set out in our Code of Conduct, in our Compliance Procedure, as well as in our Supplier Code of Conduct. The various reporting channels are set out in our Reporting Work Instruction. One such channel, the Reporting Line, is operated by an external service provider and is an anonymous way to report ethical and compliance concerns, including any concerns about modern slavery and human trafficking. The line is accessible not only to Omnimium personnel, but also to third parties who may potentially witness a violation by our personnel.

We make sure personnel, and third parties are able to disclose, without fear of retaliation, concerns, complaints or allegations of known or suspected wrongdoing or misconduct and this, regardless of the local norms and culture.

Afterwards, we undertake to review all reported matters and investigate when required, within a reasonable timeframe.

### **ALIGNING WITH GLOBAL INITIATIVES AND BEST PRACTICES**

In 2020, we joined the United Nations Global Compact (UNGC), the world's largest corporate social initiative, with more than 9,000 business and 3,000 non business participants in more than 160 countries. Joining the UNGC underscores our commitment to putting our extensive know-how and resources to work to meet the world's sustainability challenges. It also signals our intention to align our strategies and operations with the UNGC's ten Principles on human rights, labour, environment and anti-corruption.