

# Modern Slavery Statement for SC Companies, Inc.

(Fiscal Year 2022-23)

## Purpose

Since 1913, Stanley Consultants has been committed to improving lives by creating the best experience for our clients and delivering projects with valuable results. Stanley Consultants is a member-owned multidisciplinary professional services organization, with a dedication to conducting its business consistent with all laws, regulations and the highest standards of business ethics.

Our business has operated in accordance with our core values of integrity, social responsibility, excellence, mutual success, commitment and membership. Our [Code of Business Conduct](#) is our ethical compass, providing direction to all employees of Stanley Consultants regarding how to do business with integrity. The Code sets minimum expectations of our partners, suppliers and vendors, and confirms our dedication to preventing modern slavery risks in our operations and supply chain. For purposes of this Statement, Stanley Consultants includes SC Companies, Inc., and its affiliates and subsidiaries.

## Policy Statement

As described in our [Code of Business Conduct](#), Stanley Consultants does not tolerate or condone forced, bonded or involuntary labor, human trafficking or any forms of slavery. We are committed to taking the necessary steps to prevent it within our operations and supply chain, and to identifying possible modern slavery risks. We also require that our vendors pledge to use only voluntary labor in their provision of services or goods.

## Company Structure, Supply Chain and Action to Address Risk

Stanley Consultants advises on and delivers projects globally in the fields of energy, water, transportation and the environment. Our clients include utility, industrial, higher education and local, state and federal agencies and municipalities. Our service capabilities include planning, design, engineering, permitting, construction management, program management and alternative project delivery.

Our work is delivered by staff (permanent, temporary, agency, consultant, contractors and subcontractors) and suppliers. In general, our professional services activities produce a minimal risk in relation to human trafficking or any form of modern slavery. We regularly audit our business practices to confirm compliance with our policies and to validate that we are following best practices.

Stanley Consultants is committed to improving our practices to ensure that slavery and human trafficking are never present in our business or supply chain. We have adopted a risk-based due diligence approach to assess any business partner with whom we may engage. This due diligence process commences during supplier sourcing and on-boarding and flags potential suppliers that present heightened risk. It also considers geographical, industry and market factors to identify categories of the supply chain that may present a higher risk of modern slavery being present.

In addition to our IT service and other providers that perform professional services in support of the company (e.g., external auditors and accountants, etc.), most of our business partners perform professional services in support of our operations and infrastructure projects. We use best practices to review and assess these subconsultants, with careful attention to their sourcing policies in key risk areas. This ensures that we favor suppliers operating under recognized ethical codes of conduct including regular compliance audits. We only work with companies that contractually commit to comply with applicable laws and regulations.

## Training

On an annual basis, Stanley Consultants requires its employees to participate in [Code of Conduct](#) training. The Company also mandates Code of Conduct training for newly hired employees during on-boarding. For the prior fiscal year, Code of Conduct training was completed by every employee. A primary component of the training requires that each employee must certify their review and understanding of the obligations, and responsibilities under the [Code of Business Conduct](#), including the zero-tolerance policy with respect to involuntary labor, human trafficking and other forms of modern slavery.

In addition, we encourage all employees and members of our supply chain to report any concerns and instances of involuntary labor, human trafficking and other forms of modern slavery, or any other policy violation. Employees are instructed to use the Company's third party provided anonymous incident reporting platform called [Ethics Point](#). All reported [Ethics Point](#) incidents are investigated, and appropriate actions are taken, without retaliation against those who report concerns or raise questions in good faith.

## Board Approval

This Statement was made in accordance with the UK Modern Slavery Act 2015 on behalf of our operating company in the United Kingdom (Stanley Consultants, Inc.) for the financial year ending April 1, 2023. This Statement was reviewed and approved by the Board of Directors of SC Companies, Inc. on September 13, 2023.

Kate C.E. Harris

CEO & Chair of the Board of Directors