

## **HOK in the UK**

### **Modern Slavery and Human Trafficking Statement**

#### **1. Introduction**

- 1.1. HOK has a zero tolerance policy in relation to slavery and human trafficking and is committed to acting ethically and with integrity in all our business dealings and relationships. HOK is committed to maintaining and improving systems and processes to help contribute to efforts to combat modern slavery and human trafficking with the endeavour that our corporate activities and supply chains are free from these practices.
- 1.2. With a view to promoting best practice in relation to our UK business, HOK will bolster its procedures in relation to the UK business, including:
  - 1.2.1. Requiring our suppliers by contract to adhere to the Modern Slavery Act 2015 and to identify any potential risk areas in relation to modern slavery and human trafficking, and where appropriate terminate the contracts with those suppliers failing to adequately address identified risks; and
  - 1.2.2. Continuing to train our UK business personnel to raise awareness and define modern slavery and human trafficking.

#### **2. Business Structure**

- 2.1. HOK is a global design, architecture, engineering, and planning firm with 23 offices on three continents. All operations, including the United Kingdom (UK) practice, are ultimately owned by HOK Group, Inc., a company incorporated in the State of Delaware, United States.
- 2.2. The HOK Group, Inc. operates in the UK through its indirect subsidiary, HOK International, Ltd. (HOK-UK), with approximately 126 employees in the UK as of 31 December 2018.
- 2.3. HOK-UK does not of itself constitute a "commercial organization" as defined by section 54(2) of the Modern Slavery Act 2015 ("MSA"); however, HOK Group, Inc. recognizes its responsibility, as a wider organization, for its UK activities and issues this statement on behalf of its UK business in accordance with section 54(1) of the MSA. This statement shall in turn reflect the policies and procedures of its UK business, through HOK-UK, and its UK business's supply chain.

#### **3. Statement**

- 3.1. This Statement is made pursuant to section 54 of the MSA, for financial year ending 31 December 2018.
- 3.2. Modern slavery and human trafficking remains a hidden blight on our global society. Slavery and human trafficking can occur in many forms, such as forced labor, indentured or bonded labour, child labor, domestic servitude, sex trafficking,



and related forms of workplace abuse. HOK prohibits modern slavery and human trafficking within HOK and at all levels of our supply chain.

- 3.3. All HOK employees have a responsibility to comply with HOK policies, including the Employee Handbook and the Corporate Integrity Handbook, to act ethically and with integrity in our business relationships, and in accordance with all applicable law. HOK employees are expected to report any concerns, including wrongdoing, and management is expected to act upon them.

4.

#### **Policy Application**

- 4.1. HOK, in concert with a skilled Human Resources team that manages candidate recruitment, has put in place fair and transparent recruitment procedures in accordance with relevant legislation and standards to validate candidates' identities and eligibility to work.
- 4.2. We encourage all employees to raise concerns about any issue or suspicion in any parts of our business or supply chains and protect whistleblowers by maintaining an independent whistleblowing hotline administered by an independent third-party and has published the details of that hotline to our employees to ensure employees have the ability to raise an issue confidentially.
- 4.3. In order to achieve an understanding of the risks associated with modern slavery and human trafficking, HOK is committed to training its UK-based employees on best practice in this area.


5.

#### **Commitment to Improve**

- 5.1. HOK will continue to review and update our internal training program on the subject of ethical business practices, and is committed to expanding such training to employees world-wide. All HOK UK employees received training in 2017, and will again in 2019. All new HOK UK employees will receive training promptly after hire.
- 5.2. HOK will consider its relationships with suppliers and, where relevant and appropriate, introduce contractual provisions in supplier agreements to require compliance with the MSA.
- 5.3. Compliance with the MSA and the Group's high standards of compliance and ethics in this area is and will continue to be monitored by Lisa A. Green, HOK's General Counsel and Chief Compliance Officer.



Mr. William K. Hellmuth  
Chairman & CEO  
HOK Group, Inc.



Mr. Daniel Hajjar  
Director & Managing Principal EMEA  
HOK International, Ltd.