

OUR COMPANY

Wiss, Janney, Elstner Associates, Inc. (hereinafter “WJE” or “we” includes Wiss, Janney, Elstner Limited, a subsidiary of WJE International Holdings Limited, which is a wholly owned subsidiary of WJE and all affiliated entities) is committed to ethical behavior and compliance with laws foreign and domestic.

WJE observes applicable laws, rules, and regulations including the U.S. Foreign Corrupt Practices Act, U.S. import and export control laws, local anti-corruption laws, laws prohibiting the payment of commercial or private bribes, and any other applicable anti-corruption laws, international standards and principles relating to human rights including the International Bill of Human Rights, the UN’s Guiding Principles on Business and Human Rights, the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, the Children’s Rights and Business Principles, and the UK Modern Slavery Act 2015.

OUR BUSINESS

WJE is an interdisciplinary engineering, architecture, and materials science firm specializing in delivering practical, innovative, and technically sound solutions across all areas of the built world. We employ more than 700 people working in twenty-seven offices in two countries: the United States of America and United Kingdom.

OUR PEOPLE

WJE recognizes the value and dignity of all human beings. We seek to treat our staff fairly and consistently, to create a workplace and business environment that is ethical, honest and trusted. WJE conducts its activities in accordance with our core values, and other policies as they are implemented and updated from time to time.

We require our personnel to act according to the highest standards of honesty and integrity.

OUR POLICY & COMMITMENTS

Human trafficking and slavery take many forms. Trafficking involves arranging or facilitating the travel of another person with a view to exploiting that person. Slavery involves holding a person in servitude or requiring a person to perform forced or compulsory labor.

WJE opposes any form of human trafficking or slavery. Because WJE is a professional services company, we do not have a supply chain as that is generally understood. Nevertheless, WJE contracts with virtually every entity that owns, leases or manages structures. These entities are at low risk for slavery or human trafficking. We recognize that certain sectors from whom we purchase material in the ordinary course of our business (such as office equipment suppliers, office cleaning, facilities management services, waste management services, couriers, and the food and beverage industry) may be at a higher risk.

WJE will not do business with any suppliers when we become aware that they are involved in trafficking or slavery.

WJE is committed to acting ethically and with integrity in our business relationships and to monitoring our internal and external systems to prevent slavery and human trafficking in our business and supply chains.

ASSESSMENT

WJE expects our clients and suppliers to treat workers and employees with respect and fairness, to have suitable anti-slavery and human trafficking policies and procedures in place, and to act in accordance with applicable laws.

WJE will review the policies of clients and suppliers regarding the prevention of slavery and human trafficking. We retain the right to audit suppliers to comply with these provisions. WJE will eliminate suppliers who are involved in slavery and human trafficking.

WJE makes this statement for the financial year ending December 31, 2021. It will be reviewed and published on an annual basis.

Approved by the Board

A handwritten signature in blue ink, reading "William J. Nugent", is written over a horizontal line.

William J. Nugent

President and CEO