

Modern Slavery Statement



INTRODUCTION

This statement relates to WSP Australia Pty Limited (ACN 078 004 798) and all of its subsidiaries operating in Australia (“WSP Australia”). It outlines the actions taken by WSP Australia to address the risks of modern slavery in its operations and supply chains, in accordance with the Modern Slavery Act 2018 (Cth) (“Act”).

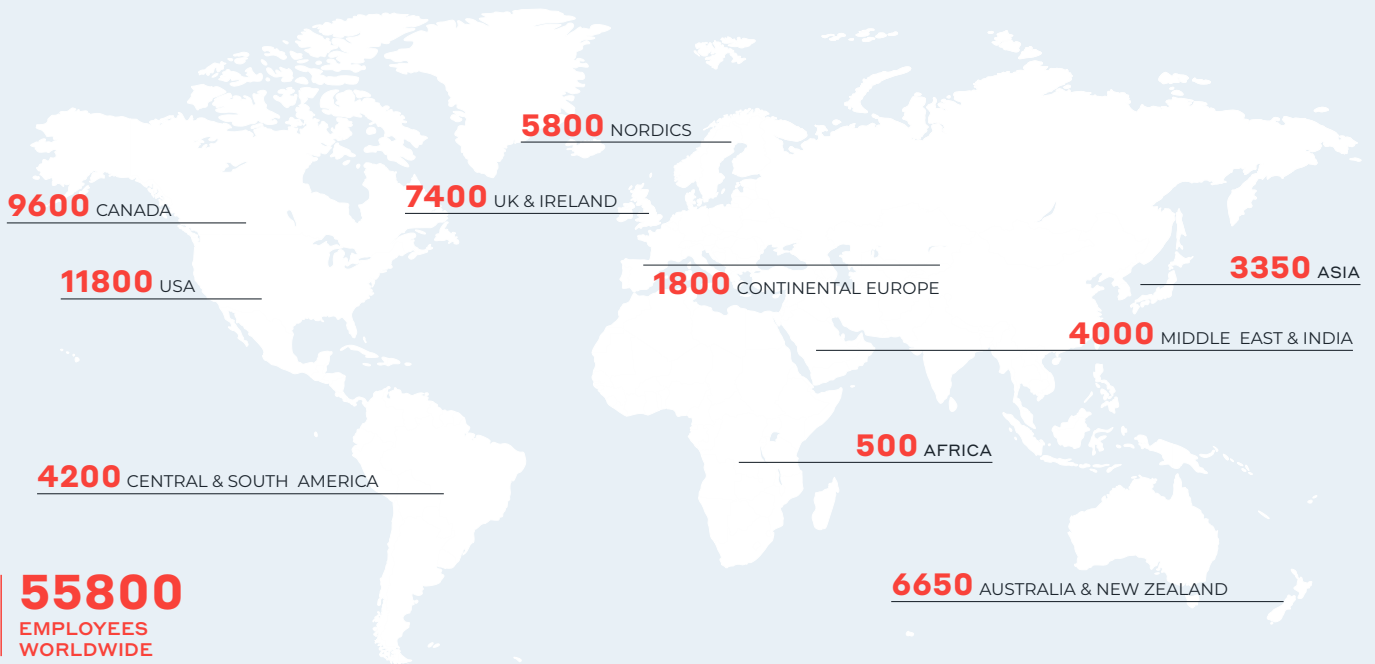
OUR COMMITMENT

WSP Australia is committed to maintaining the highest standards of ethics and integrity through its business and relationships and recognises the critical role of the private sector in ending slavery. In light of this, WSP Australia has a zero-tolerance policy in relation to any form of modern slavery, including servitude, forced or compulsory labour, child labour, sexual exploitation, forced marriage and human trafficking and is committed to doing its utmost to implement and enforce systems and controls to avoid modern slavery risks in its business or within supply chains. This commitment is reinforced by the WSP Global Human Rights Statement and the WSP Code of Conduct.

“WSP will not be complicit in human rights abuses. We are dedicated to ensuring that our dealings and activities are carried out in compliance with the human rights standards established within the Universal Declaration of Human Rights, the International Labour Organization’s Declaration on Fundamental principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights”

(WSP Global Human Rights Statement, 2021).





ABOUT WSP

WSP is a global business with more than 55,000 employees in 40+ countries. The worldwide business is ultimately owned by WSP Global Inc., a Canadian company listed on the Toronto Stock Exchange. WSP's principal subsidiary in Australia is WSP Australia Pty Limited, which operates nationally and globally.

WSP is one of the world's leading engineering professional services consulting firms. We are dedicated to our local communities and propelled by international brainpower. Our work includes engineering iconic buildings, designing sustainable transport systems, developing clean energy, restoring the environment, and much more. WSP Australia's principal clients are public bodies, private companies and financial institutions.

WSP Australia primary employs highly-skilled staff, including engineers, technicians, scientists, planners, surveyors, environmental specialists, designers and construction management professionals.

In Australia, we bring together approximately 4,300 talented people across 14+ offices with head office located at Level 27, Ernst & Young Center, 680 George Street, Sydney NSW 2000, Australia.





4300
AUSTRALIAN
EMPLOYEES

14
OFFICES ACROSS
AUSTRALIA

AUSTRALIAN OPERATIONS

Our focus on reducing modern slavery risks within our business and supply chain is supported by a robust governance and policy framework which outlines how we manage our people and suppliers.

The scope and nature of WSP Australia’s business model, activity and footprint mean that WSP Australia’s operations and supply chain is less susceptible to modern slavery practices than companies that operate in other sectors. Nonetheless, WSP Australia continues to take practical and proportionate steps to ensure that slavery does not take place in WSP’s business and supply chain, notwithstanding the disruptive effect of COVID-19 across 2021.

SUPPLY CHAIN

WSP Australia conducted a thorough risk assessment of its supply chain to identify industries, products, and countries considered amiable to slavery-sustaining practices. Published indexes, such as the Global Slavery Index and the Corruption Perceptions Index, were used for this exercise.

The risk assessment concluded that the majority of services supplied to WSP Australia were provided by Australian companies and, consequently, considered low-risk services (Australia at a country level has a low inherent risk of modern slavery).

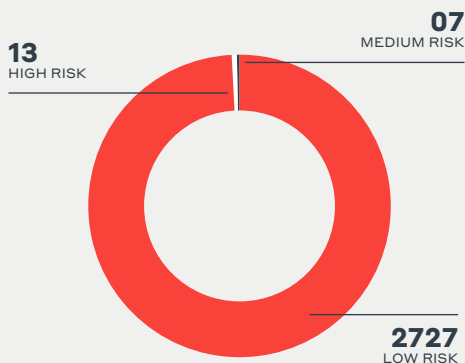
The greatest area for modern slavery risks was identified as related to cleaning, couriers, catering, vehicle/equipment hire and IT hardware. Nevertheless, these services form the minority of the WSP Australia’s supply chain.

The 2021 risk assessment of the supply chain also revealed that only 0.7% of all WSP Australia’s suppliers are entities located in countries considered to have a high risk of modern slavery (such as India, Philippines, Indonesia, Papua New Guinea and Thailand), and within this group, 80% of the suppliers provide professional sub consultancy services (considered low-risk).

WSP Australia often partners with other professional services firms to form Alliances or Joint Ventures. Due diligence is always conducted to ensure that WSP Australia partners are companies that uphold similar ethical standards, including zero-tolerance of modern slavery.



WSP SUPPLIERS MODERN SLAVERY COUNTRY RISK



ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

WSP Australia is committed to addressing modern slavery, and we continue to make significant progress in our understanding of modern slavery risks, including its prevention and remediation. The key actions taken in 2021 by WSP Australia consisted of:

- Risk-Based Approach

WSP Australia has established risk management processes to identify, assess, control, and mitigate modern slavery in accordance with the Act.

As part of its onboarding process, WSP Australia has implemented the Modern Slavery Act Questionnaire ("MSA Questionnaire") that has to be completed by all vendors WSP Australia process of due diligence, vetting and approving opportunities, clients and business partners operating in countries that present modern slavery risk is subject to scrutiny and approval, typically requiring a review by the Ethics and Compliance business function.

- WSP Policies

The following WSP Policies reinforce WSP Australia's commitment to tackling modern slavery:

- WSP Code of Conduct
- WSP Business Partner Code of Conduct
- WSP Global Human Rights Statement
- WSP Working with Third Parties Policy
- WSP High-Risk Countries and Sanctions Compliance Policy
- WSP Policies are available to WSP employees and third parties on our website.

WSP Code of Conduct applies to all employees across the WSP Group and our suppliers and commits us both to caring for the people in our operations and across our supply chains.

Additionally, WSP Australia's terms and conditions ("Agreements") include modern slavery provisions, requiring suppliers to:

- Comply with all applicable laws, statutes, regulations and codes prohibiting modern slavery in any jurisdiction where they conduct business activities;
- Comply with the WSP Code of Conduct; and
- Provide prompt notification to WSP Australia upon reasonably suspecting or becoming aware of any activity, practice or conduct that would constitute an offence of modern slavery.

- Training

All WSP Australia employees regularly undertake a mandatory code of conduct training in accordance with the Act. Including the annual Ethics and Code of Conduct refresher training.

The Code of Conduct training completion rate is part of WSP Australia's Key Risk Indicators (KRIs), and its results are reported to the Board of Directors quarterly. The completion rate in 2021 was 100%.

- Due Diligence

In 2021, WSP Australia implemented a new due diligence and third-party vetting online tool that conducts a risk assessment of potential new partners' prior engagement, including completion of the MSA Questionnaire.

In addition, prospective suppliers to WSP Australia are required to disclose the nature and status of their anti-slavery procedures before being onboarded as a supplier by WSP.

- Grievance Mechanisms

WSP Australia encourages its employees and supply chain to report any actual or suspected instances of breaches of ethical conduct, including modern slavery or other violations of Human Rights, in a timely manner. WSP Australia employees can report suspected misconduct to their manager, their regional Ethics and Compliance representative or WSP's Ethics and Compliance Office at ethics@wsp.com. Additionally, suspected misconduct can be reported confidentially and anonymously through WSP's Business Conduct Hotline. The Business Conduct Hotline can be contacted via <https://wsp.ethicspoint.com/>.

Should a high risk of Modern Slavery or an instance of Modern Slavery within WSP Australia's operations or supply chain be identified, WSP Australia will immediately work with the supplier to address the issues identified. If a satisfactory resolution cannot be achieved, WSP Australia may cease its relationship with such a supplier.

CONSULTATION ACROSS OUR GROUP

Members of senior leadership across WSP Australia and its subsidiaries have been engaged and consulted in the development of our modern slavery approach. To ensure the people across the business are familiar with WSP Australia's approach to addressing modern slavery risks, we are committed to reviewing our internal procedures to reduce the risk of modern slavery in our operations and have trained staff across WSP Australia and its subsidiaries to raise awareness of this important issue. We are committed to contributing positively to the communities we work in, setting high standards and promoting an ethical way of working.

EFFECTIVENESS

WSP Australia undertakes the following actions to assess the effectiveness of the actions to control Modern Slavery risks:

- WSP Australia monitors and annually reviews its compliance with the Act and reports the results internally to the WSP Australia leadership team
- KRIs relating to compliance with the Act were established and are reported quarterly to the WSP Australia Board of Directors and leadership
- WSP Australia's internal audit team conducts an internal audit of WSP Australia's due diligence and procurement processes
- WSP Australia reviews the content of the Code of Conduct training annually to ensure it is current and fit for the purpose
- WSP Australia reviews the risk assessment process annually to ensure that the definitions of high-risk products/services and countries align with the latest published index data
- WSP has a rigorous process to assess and approve opportunities for projects in countries with a higher risk of Modern Slavery (High-Risk Countries, or HRC).
- The process is governed by WSP Global High-Risk Countries and Sanctions Compliance Policy (HRC Policy). The HRC Policy has been reviewed and updated in 2021. Any opportunity, clients, and any third parties located in an HRC undergo a rigorous Due Diligence process and must be approved by Ethics & Compliance Team and the regional CEO or the Global Board in line with the WSP Delegation Authority. The Due Diligence and the review process include assessing Modern Slavery risk and implementing the appropriate mitigation measures.



CONTINUOUS IMPROVEMENT

WSP Australia welcomes constructive engagement with all stakeholders to increase the effectiveness of the steps described above. WSP Australia will keep adapting through continuous improvement to maintain the highest standards of ethics and integrity through its business and relationships.

BOARD APPROVAL

This Modern Slavery Statement has been reviewed, approved and endorsed by the board of directors of WSP Australia Pty Limited for the financial year ending 31 December 2021 at a meeting held on 25 May 2022.

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About

WSP is one of the world's leading engineering professional services consulting firms, bringing together approximately 4,300 talented people across 14 offices in Australia. We are technical experts who design and provide strategic advice on sustainable solutions, and **future ready** engineering projects that will help societies grow for lifetimes to come.

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