



# Modern Slavery Statement

Submitted by:

**Golder Associates Pty Ltd**

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30 June 2021

This joint statement is made on behalf of Golder Associates Pty. Ltd., and all its subsidiaries and affiliated companies (hereinafter “Golder”) for the 2020 financial year. In accordance with Sections 14 and 16 of the Australian Modern Slavery Act 2018, this statement sets out the measures we have taken to prevent slavery and human trafficking in our supply chains and in our business.

On or about December 3, 2020, WSP Global Inc. (“WSP”) entered into an arrangement agreement providing for WSP’s acquisition of all of the issued and outstanding shares of Enterra Holdings Limited (Golder’s former holding company). The acquisition closed on April 7, 2021.

During the 2020 financial year, Golder was an employee-owned, global organization providing consulting, design, and construction services in our specialist areas of earth, environment, and energy through technical excellence, innovative solutions and award-winning client service.

Our more than 7,500 people operating from 155 offices worldwide deliver deep technical understanding, cross-disciplinary thinking and a passion to help our clients succeed. Our clients represent the world’s major industries and drivers of development: Oil and Gas, Mining, Manufacturing, Power, and Infrastructure.



We are committed to high standards of ethical behaviour in the conduct of our business. We believe it is an indisputable truth that all people are entitled to be treated with dignity and respect. Modern slavery, in any form, is unacceptable. Golder does not and will not tolerate any association with modern slavery or human trafficking in any form.

Golder convened a regulatory compliance review team, comprised of Golder’s regional senior management and global compliance counsel, to establish the process for reviewing and addressing our commitment to ensuring modern slavery is non-existent in our business. Essential suppliers and their risk levels were determined, as follows:

- Professional services – low risk
- Non-professional services – medium / high risk
- Supplies / services (including such items as PPE, office supplies, travel, hotel services) – high risk, “anonymous”

Our written Code of Conduct [available at: <https://www.golder.com/about-us/corporate-responsibility/>] affirms that we are committed to:

- having integrity in our business by operating in an honest, reliable, ethical and trustworthy manner in both our relationships and work; and
- respecting and caring about our people, clients, and the communities and environments in which we live and work.

Our Code of Conduct also clearly expresses our expectation that our suppliers behave in a manner consistent with our Code of Conduct and our Health and Safety Policies.

We actively encourage employees to report any situations which they believe do not comply with the Code of Conduct or that are unethical, inappropriate or illegal. Golder maintains an ethics and compliance hotline, through which employees can report compliance concerns securely and confidentially.

Golder is also a signatory of and committed to the UN Global Compact Ten Principles which seek to ensure that businesses operate in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labour, environment, and anti-corruption, including the elimination of all forms of forced and compulsory labour and abolition of child labour. These same principles are reflected in Golder's Human Rights Policy, which is available to all our global colleagues.

We have strengthened our risk-based third-party due diligence program. The goal of our program is to mitigate bribery and corruption risks associated with our engagement of third parties and gain greater visibility into the ethical practices of the third parties with whom we do business. Golder engaged a third-party due diligence provider to help facilitate our due diligence program. To date, over 5,000 entities have been screened including essential suppliers and clients. Part of the screening process includes an adverse media monitor search, which is designed to notify Golder if a third party has been the subject of negative treatment on the internet. Golder is pleased to report that the screening process revealed no allegations of participation in modern slavery or human trafficking by the third parties that Golder screened through this process (through December 31, 2020).

Golder maintains a training matrix for all staff and mandates compulsory annual training in several areas including Anti-Bribery and Anti-Corruption training. In 2020, Golder performed live, bespoke training for Region leadership throughout our organization. This training addressed anti-bribery/corruption topics, as well as directly addressed the risks of modern slavery. In 2020, Golder also commenced the search for a training solution that will focus on Modern Slavery; once finalised, Golder intends to roll the training out to all staff globally as an integral component of our mandatory annual training package.

Our senior management team conducted a regional gap analysis review of our policies and procedures to determine where potential exists for improvement. This analysis included:

- Internal audits of our projects and processes;
- Reviews of audit findings;
- Reviews of essential suppliers (annual);
- Monitored use of Golder's spend on suppliers via audits and project manager surveys; and
- Implementation and monitoring of third-party due diligence review results.

Where necessary, policies and relevant procedures have been updated accordingly.

As stated, Golder is committed to high standards of ethical behaviour in the conduct of our business and as such will continue to review and address our operations to ensure alignment. In this light, some aspirational targets for 2021 include:

- Implementation of awareness training for Golder staff (modern slavery and what it means);
- Continuation of the senior management compliance review team;
- Increased review and focus on procurement including supplier audits.

As noted above, Golder was acquired by WSP and the transaction closed on April 7, 2021. Golder has begun integrating its ethics and compliance programs, and its policies and procedures to align with WSP's current practices. We will prepare our 2021 statement, or file such statement jointly with WSP, as necessary, to reflect the modifications made to our practices, policies and procedures.

We intend to continue working towards raising awareness of, and further minimizing risks associated with, slavery and human trafficking within our business and supply chains. We will detail these efforts in our next annual statement.

This Statement was approved by the Board of Directors for Golder Associates Pty. Ltd.

## Signature Page

### **Golder Associates Pty Ltd**



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