



2023 MODERN SLAVERY REPORT

APRIL 2024



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1. INTRODUCTION

This report relates to WSP Global Inc. and its subsidiaries (collectively, “WSP”, “we” “us” or “our”), including specifically WSP Canada Inc., WSP Australia Pty Limited, WSP UK Limited and WSP Norge AS, during the reporting period from January 1, 2023, to December 31, 2023, unless otherwise indicated herein and where required by the context. It outlines the actions taken by WSP to address the risks of modern slavery¹, including forced labour and child labour, in its operations and supply chains, as required by the laws² implemented in Canada, Australia, the United Kingdom and Norway. It was prepared in consultation with WSP Canada Inc., WSP Australia Pty Limited, WSP UK Limited and WSP Norge AS. WSP recognizes the critical role of the private sector in ending modern slavery. WSP is therefore publishing the details of the steps it has taken in 2023 to ensure that modern slavery is not taking place in its own operations, as well as in its supply chains.

2. OUR COMMITMENT

WSP has a zero-tolerance policy in relation to any form of modern slavery. We prohibit our people from engaging in, suggesting, allowing or ignoring modern slavery, including forced labour, child labour, sexual exploitation or abuse and human trafficking, in the conduct of our business. This commitment is implemented through WSP’s Global Human Rights Policy and Code of Conduct. We also implement appropriate risk mitigation controls in relation to projects in countries with high modern slavery risk.

WSP welcomes constructive engagement with all stakeholders, including suppliers, governmental authorities and clients, to increase the effectiveness of its modern slavery risk mitigation practices. WSP will continue to adapt to maintain the highest standards of ethics and integrity in its business and relationships.

3. DESCRIPTION OF WSP

Global Structure and Activities

WSP is a global business with 66,500 employees in approximately 50 countries. WSP Global Inc. is a corporation existing under the *Canada Business Corporations Act* and is the ultimate parent company of the WSP group of companies. WSP’s registered and head office is located at 1600 René-Lévesque Boulevard West, 11th Floor, Montreal, Quebec, H3H 1P9. WSP Global Inc.’s common shares are listed on the Toronto Stock Exchange (TSX: WSP).

As one of the largest professional services firms in the world, WSP exists to future-proof our cities and our environment. It provides strategic advisory, engineering and design services to clients seeking sustainable solutions in the transportation, infrastructure, environment, building, energy, water and mining sectors. WSP’s principal clients include public bodies, private companies and financial institutions. WSP’s global experts include advisors, engineers, environmental specialists, scientists, technicians, architects and planners, in addition to other design and program management professionals.

¹ For purposes of compliance with the Canadian Act, the phrase “modern slavery” should be understood to mean forced labour and child labour as defined in section 2 of this Act.

² *Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff* (Canada) (the “Canadian Act”); *Modern Slavery Act 2018* (Cth) (Australia) (the “Australian Act”); *Norwegian Transparency Act* (the “Norway Act”); and *Modern Slavery Act 2015* (UK) (the “UK Act”, and collectively, with the Canadian Act, Norway Act and the Australian Act, the “Acts”).

Our Global Presence



Figures as of December 2023

Entities Subject to Modern Slavery Disclosure Requirements

WSP’s operations in the following jurisdictions are subject to modern slavery disclosure requirements:

- **Canada:** WSP’s principal subsidiary in Canada is WSP Canada Inc., a corporation organized under the *Canada Business Corporations Act*, which operates nationally and globally. Subsidiaries and affiliates of WSP Canada Inc. operating in Canada include WSP Applied Solutions Inc. and WSP E & I Canada Ltd. WSP Canada’s principal clients and those of its affiliates are public bodies and private companies. In Canada, we bring together approximately 12,200 talented people across 130 offices, with the head office located at 1600 René-Lévesque Boulevard West, 11th Floor, Montreal, Quebec, H3H 1P9.
- **Australia:** WSP’s principal subsidiary in Australia is WSP Australia Pty Limited, a corporation incorporated in accordance with the laws of the Commonwealth of Australia (which includes all its subsidiaries operating in Australia: Enstruct Group Pty Limited, Golder Associates Pty Limited, Irwinconsult Pty Ltd, Elton Consulting Group Pty Ltd, Greencap Holdings Limited and Calibre Professional Services One Pty Ltd). WSP Australia operates nationally and globally, and its principal clients are public bodies and private companies. In Australia, we bring together approximately 5,700 talented people across 25 offices, with the head office located at Level 27, Ernst & Young Center, 680 George Street, Sydney NSW 2000.
- **United Kingdom:** WSP’s principal subsidiary in the UK is WSP UK Limited, which operates nationally and globally. As a highly specialized professional services company, we bring together approximately 9,350 talented people across 32 offices in the UK, with the head office located at WSP House, 70 Chancery Lane, London WC2A 1AF.

- **Norway:** WSP's only subsidiary in Norway is WSP Norge AS, which operates nationally and globally. WSP Norway's principal clients are primarily public bodies and private companies. In Norway, we bring together approximately 500 talented people across 15 offices, with the head office located at St. Olavs plass 5, 0165 Oslo.

In all of our jurisdictions of operation, WSP's primary inputs are its highly skilled employees; the complex IT equipment and systems that our employees use, the offices where they work, and various ancillary travel and professional services.

Our Global Supply Chain

WSP's Global Procurement team is responsible for streamlining procurement practices, developing governance standards and a global procurement strategy. The Global Procurement team is also responsible for managing major contracts benefiting the global company's corporate functions. Subregional³ or country procurement teams are responsible for sourcing and procuring goods and services under subregional/country and global supplier agreements, as well as developing subregional/country procurement strategies.

The scope and nature of WSP's business model and activities and jurisdictions of operation, being primarily the provision of professional services in OECD countries, generally limits exposure to modern slavery risks in our supply chain. From time to time, however, WSP undertakes limited importation activities in relation to certain goods for its client projects.

- The suppliers of the Canadian business are located around the world and are principally other entities controlled by WSP, other professional services companies, IT providers, landlords and a variety of service providers. WSP Canada also occasionally imports goods that are used in environmental remediation projects, infrastructure inspection services and/or other project related services that are located and performed at client sites. The suppliers of the imported goods are primarily located in Europe and the United States, and these suppliers may additionally have their own supply chains in overseas locations.
- The vast majority of the suppliers of the Australian business are located within Australia, with a few suppliers located in other countries. The suppliers of the Australian business are principally other professional services companies, IT providers, landlords, a variety of service providers, and entities controlled by WSP. WSP Australia also supplies goods used in groundwater remediation systems and CCTV cameras that are operated on client sites.
- The suppliers of the UK and Norway businesses are located around the world and are principally other entities controlled by WSP, other professional services companies, IT providers, landlords and a variety of service providers.

³ In this document, where we use the term "regions", we are referring generally to WSP's reportable segments: Canada, Americas (USA and Latin America), EMEIA (Europe, Middle East, India and Africa) and APAC (Asia Pacific – Asia, Australia and New Zealand). Where we use the term "subregions", we refer to a further breakdown which includes Canada, the USA, Latin America and the Caribbean, the UK, Central Europe, Nordics, the Middle East, India, Africa, Australia, New Zealand and Asia.

4. POLICIES

The following WSP global policies reinforce WSP's commitment to addressing modern slavery:

Code of Conduct

Our Code of Conduct applies to all employees, directors, officers and others in an employment-type relationship with WSP and highlights everyone's responsibility to respect and promote human rights and equality. The Code of Conduct explicitly prohibits all forms of modern slavery, including forced labour, child labour, sexual abuse or exploitation and human trafficking.

Business Partner Code of Conduct

Our Business Partner Code of Conduct outlines WSP's expectation that its business partners safeguard human rights in all their dealings, not engage in any form of modern slavery and comply with all applicable modern slavery laws and regulations. The Business Partner Code also states our expectations that business partners must promptly disclose any suspected violation of these principles to WSP.

Global Human Rights Policy

Our Global Human Rights Policy sets out our global approach to respecting, supporting and safeguarding human rights. The policy applies to WSP and to all employees and other persons in an employment-type relationship with WSP, as well as business partners acting on our behalf.

Reporting and Investigation Policy

Our Reporting and Investigation Policy describes how WSP implements sound governance in internal investigations, in particular highlighting the obligation of employees to report misconduct and our zero-tolerance policy for retaliation against those who make a report. The policy also describes different options to make a report, including our worldwide third-party Business Conduct Hotline, which can be used anonymously if permitted by applicable law.

High-Risk Countries and Sanctions Compliance Policy

Our High-Risk Countries and Sanctions Compliance Policy (and associated list of high-risk countries) explains our approach to identifying and applying higher scrutiny of projects in foreign locations where risk is elevated. The determination of higher risk includes the assessment of modern slavery risk, as indicated by international indices.

Several WSP subregions/countries also have local policies and procedures that complement these global policies. For example, WSP UK adopts procedures in relation to modern slavery risk and provides further guidance to employees through its Slavery Prevention Policy. WSP Australia's supplier contract terms and conditions include modern slavery provisions and WSP is in the process of rolling out similar supplier contract terms and conditions globally.

Procurement Guidelines

WSP's procurement function adheres to its Global Procurement Guidelines. These guidelines are in place to set the course for an ongoing exercise of aligning policies, procedures and structures across WSP's subregions. WSP aims to receive best value for the goods and services required for its operations while mitigating any negative impacts on the environment and local communities, including human rights, through fair, transparent, consistent, cost-effective and cost-efficient procurement procedures. To foster compliance with these objectives, the general principles of accountability, transparency, honesty, integrity and equity must guide the procurement process.

WSP's Board of Directors, together with the Governance, Ethics and Compensation Committee, is responsible for overseeing and monitoring implementation of procedures, policies and initiatives in relation to our corporate, social and environmental responsibilities, including the policies listed above.

5. DUE DILIGENCE PROCESSES

WSP maintains proportionate due diligence processes and other procedures to identify and exclude modern slavery from its business and supply chain. The task of establishing and reviewing the effectiveness of those procedures has been led by the Ethics & Compliance function, with support from the Human Resources, Procurement and Health, Safety, Environment and Quality functions. A number of these due diligence processes and other procedures are described below.

Our enterprise resource planning system and our third-party onboarding and vetting platform allow us to conduct targeted due diligence on our suppliers prior to doing business with them. They are currently being rolled out across the global business and require certain business partners to respond to a questionnaire and certify their agreement with the Business Partner Code of Conduct.

WSP's third-party onboarding and vetting platform considers factors such as ethics, sanctions, integrity and adverse media in its risk evaluation, enhanced by subregion-specific checks. When fully implemented, the platform will improve the sharing of risk evaluation data between corporate functions involved in the onboarding process and allow greater transparency regarding approved business partners. When the initial vetting identifies an elevated risk of modern slavery, amongst other risk factors, the supplier undergoes an elevated screening which is conducted by WSP's Ethics and Compliance team. This integrity review includes an assessment of the risk not only from the supplier's vetting results, but also considers the nature of the goods or services that the supplier is contracted to provide.

In addition, WSP has a rigorous process to assess and approve opportunities for projects in countries with higher risks, including higher risk of modern slavery, through the High-Risk Countries and Sanctions Compliance Policy. Any opportunity, client or third party located in a known high-risk country undergoes a rigorous due diligence process and must be approved by the Ethics & Compliance team and, where higher risk is present, applicable executive management must also provide its approval. The due diligence and review process includes assessing modern slavery risk and implementing the appropriate mitigation measures.

In some regions, further due diligence procedures apply. For WSP Australia, higher risk suppliers are required to complete a formal questionnaire requiring responses to questions on topics such as anti-slavery procedures and supply-chain risk management, and a formal declaration of compliance with the Australia Modern Slavery Act. The completion of the questionnaire is mandatory for suppliers associated with specific industries and their inclusion in the approved supplier list is contingent upon review and approval in WSP's onboarding and vetting platform. WSP UK includes anti-slavery checks (negative media checks and a questionnaire that includes a modern slavery question) in both pre-engagement assessments and subsequent periodic refreshed due diligence.

Grievance Mechanisms

WSP encourages its employees and members of its supply chain to report any actual or suspected breaches of ethical conduct, including modern slavery or other violations of human rights, in a timely manner. WSP employees can report suspected misconduct to their manager, their subregional Ethics and Compliance representative or WSP's Ethics and Compliance Office at ethics@wsp.com. Additionally, suspected misconduct can be reported through WSP's Business Conduct Hotline. Information regarding the Hotline can be found at wsp.ethicspoint.com.

6. RISK ASSESSMENT

Global Risk Assessment

WSP has a global risk assessment process which covers a range of risks to its business. With respect to modern slavery risk, there are two key considerations: the scope of services rendered and the foreign location where the services are provided. WSP's business primarily includes providing professional consultancy services in a variety of engineering, environmental and similar disciplines. These services are less vulnerable to modern slavery risk given the skill of the professionals providing such services. Therefore, the risk assessment focuses on the countries in which modern slavery is more prevalent. Global indices such as the

Global Slavery Index are used to assess the countries included in WSP's high-risk countries list, triggering the supplementary due diligence processes outlined above.

In each subregion/country, a specific risk assessment may be required from time to time based on the profile of the business. For the reporting period, risk assessments were conducted for the following countries:

Canada Risk Assessment

In 2023, WSP Canada conducted an initial risk assessment of its supply chain to identify industries, products and countries that may be susceptible to practices that perpetuate any form of modern slavery. Published indices such as the Global Slavery Index and the Corruption Perceptions Index were used for this exercise. The risk assessment concluded that the majority of WSP Canada's suppliers are Canadian companies and are therefore considered low risk. The 2023 supply chain risk assessment found that less than 0.5% of WSP Canada's suppliers are located in countries considered high risk for modern slavery. Within this group, 99% of suppliers provide professional sub-consulting services that we consider low risk. We recognize that our suppliers may have their own supply chain, and our risk assessments and procurement decisions consider this risk where appropriate and possible. When WSP Canada enters into alliances or joint ventures with other professional services firms, thorough due diligence is always conducted to ensure that WSP Canada's partners are firms with equivalent ethical standards, including zero tolerance for modern slavery.

Australia Risk Assessment

WSP Australia conducted a thorough risk assessment of its supply chain in 2023 to identify industries, products and countries considered amenable to slavery-sustaining practices. Published indices, 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 would consequently be considered low-risk services. The modern slavery risk areas for WSP were identified as: facilities, cleaning, couriers, catering, drilling, vehicle repair and building maintenance. Nevertheless, these services form the minority of the WSP Australia's supply chain. The risk assessment of the supply chain also revealed that less than 1% of WSP Australia's suppliers are entities located in countries considered to have a high risk of modern slavery (such as South Africa, China, Philippines, Indonesia, Papua New Guinea and Thailand), and within this group, 96% of the suppliers provide professional sub consultancy services (considered low-risk). When WSP Australia partners with other professional services firms to form alliances or joint ventures, due diligence is always conducted to ensure that WSP Australia's partners are companies that uphold similar ethical standards, including zero tolerance of modern slavery. The Australia risk assessment included newly acquired entities; to the extent practicable, their suppliers have been onboarded onto the WSP platforms.

Norway Risk Assessment

WSP Norway carries out ongoing assessments of risk of negative consequences for basic human rights and decent working conditions linked to its activities and business relationships, and continuously monitors any related violations. For WSP Norway's own operations, the assessment is based on regularly conducted employee surveys that cover all employees within the organization, as well as review of reports through our health and safety reporting tool. The employee survey includes a separate module addressing equality and discrimination. The insights gathered from these surveys, in combination with regular monitoring and follow-up of our employees' working hours and workloads, enable WSP Norway to understand the experience and perspectives of its employees, identify areas for improvement, and develop concrete action plans and initiatives. During the reporting period, WSP Norway has not identified any actual adverse impact on human rights and decent working conditions within our own operations. WSP Norway does recognize, however, that there are inherent risks in our business, including but not limited to adverse impacts on working conditions for our employees, notably related to stress, excessive working hours and different forms of discrimination.

For WSP Norway's supply chain, these due diligence assessments involve mapping the company's supply chain and business partners in relation to their activities (industry, products, services, geographical markets, production process and previously identified risks) and considering if any measures should be taken to investigate potential negative consequences for basic human rights and decent working conditions. The company is committed to implementing measures where the degree of severity and probability of damage is greatest and where the company has the greatest influence for positive change. The assessment considers the company's connection to and responsibility for the risk, and the size, nature and context of the business.

WSP Norway's 2023 risk assessment did not identify any actual human rights violations in WSP Norway's supply chain or with any sub-consultants. One case of a suspected breach of human rights was declared by a hotel and conference organizer. The case derived from the hotel's own service supplier, and WSP has been informed that the risk has been mitigated and the matter resolved.

7. TRAINING & ENGAGEMENT

WSP trains all employees annually on their responsibilities under our Code of Conduct through mandatory refresher training. Starting in 2024, the material will include a specific component regarding the prevention of modern slavery. In 2023, WSP published a company-wide modern slavery awareness intranet article in order to provide targeted, practical guidance to our employees on this topic.

In some WSP subregions and in certain sectors where modern slavery risk is potentially higher, targeted training and awareness activities are conducted. For example, WSP in the United States provides anti-human-trafficking training to employees whose work includes higher-risk locations and contracts.

WSP is participating in the six-month UN Global Compact Canada [Business & Human Rights Accelerator](#) program. The program began in February 2024 and its objective is to help businesses advance their human rights due diligence process.

8. REMEDIATION

Remediation efforts rely on the awareness of reporting channels and confidence in WSP's investigation response. As noted in the Policies section, WSP has a Reporting and Investigation Policy to communicate our commitment to fair and effective investigations, and a Business Conduct Hotline available worldwide and 24 hours a day, which can be used by employees, business partners, clients and members of the public to report modern slavery concerns.

If WSP identifies modern slavery incidents in our business or in our supply chain, our response will be practical and proportionate and also consider the human rights impacts of any remediation on those affected, such as loss of employment or income.

No instances of forced labour or child labour have been identified in the risk assessments carried out in WSP's supply chain during the reporting period. Therefore, no measures have been taken during the reporting period to remediate forced labour or child labour or loss of income in WSP's activities and supply chains.

9. CONSULTATION

Members of senior leadership of WSP Global, WSP Australia, WSP UK, WSP Canada, WSP Norway and their subsidiaries have been engaged and consulted in the development of our global approach to assessing and managing modern slavery risks in our operations and supply chain. WSP is committed to regularly reviewing its internal procedures and practices to reduce the risk of modern slavery in our operations and supply chain. We are committed to contributing positively to the communities in which we work, setting high standards and promoting an ethical way of working.

10. EFFECTIVENESS

WSP undertakes the following activities to assess the effectiveness of the actions to control modern slavery risks within our operations and supply chain:

- Creating new content for the annual Code of Conduct refresher training to ensure it is current and relevant.
- Tracking the completion rate for WSP's mandatory Code of Conduct onboarding and refresher training. We report our completion rate per region in our Global ESG Report.
- Reviewing the High-Risk Countries criteria periodically to ensure that the definitions of high-risk countries align with the latest published index data.
- Reviewing available industry reports and survey results to improve the data underlying our approach.
- Reviewing our related global policies annually to ensure they align with regulatory requirements and company expectations.
- Learning from experience and feedback during our due diligence processes to improve the processes and results in the future.
- Periodically evaluating the effectiveness of modern slavery prevention activities.

WSP entities which are subject to subregional/country modern slavery disclosure requirements must monitor and annually review compliance with the regulation and report the results internally to the subregional/country leadership team. Additionally, some subregions/countries implement further effectiveness measures. For example, WSP Australia has established Key Risk Indicators to promote compliance with the Australian Act, which are reported quarterly to the WSP Australia Board of Directors and leadership, and WSP Australia's internal audit team conducts regular internal audits of WSP Australia's due diligence and procurement processes.

WSP Norway monitors the implementation and effectiveness of its internal obligations, activities and targets for due diligence assessments, and carries out regular assessments of the results achieved, communicating the results at relevant levels. WSP Norway also seeks regular feedback from suppliers to confirm that risk-reducing measures are followed, and that damage has been prevented or reduced, and from representatives and trade unions where there are affected employees.

11. APPROVAL

This report has been approved by the Board of Directors of WSP Global Inc. for the financial year ended December 31, 2023, at a meeting held on March 28, 2024. It has been reviewed and acknowledged by the boards of directors of WSP Australia Pty Limited, WSP UK Limited and WSP Norge AS with respect to the information pertaining to Australia, UK and Norway, respectively.

In accordance with the requirements of the Canadian Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised



reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Canadian Act, for the reporting year listed above.

Pursuant to section 11(4)(b)(ii) of the Canadian Act, this approval is provided on behalf of WSP Canada Inc.

A handwritten signature in black ink, appearing to read 'ALH' followed by a flourish.

Alexandre L'Heureux
Global President, Chief Executive Officer and Director of WSP Global Inc.
April 3, 2024

I have the authority to bind WSP Global Inc.

Forward-Looking Statements

In addition to disclosure of historical information, WSP may make or provide statements or information in this report that are not based on historical facts, and which are considered to be forward-looking information or forward-looking statements under

Canadian securities laws. Forward-looking statements relate to future events or future performance and may include, but are not limited to, estimates, plans, expectations, opinions, forecasts, projections, guidance or other statements that are not statements of fact, including in particular, our modern slavery objectives which include, without limitation, governance objectives, objectives in respect of our internal evaluation and management of modern slavery risks and modern slavery reporting and disclosure objectives.

A statement made is forward-looking when it uses what we know and expect today to make a statement about the future. Forward-looking statements can typically be identified by terminology such as “may”, “will”, “should”, “expect”, “plan”, “anticipate”, “believe”, “estimate”, “predict”, “forecast”, “project”, “intend”, “target”, “potential”, “continue” or the negative of these terms or terminology of a similar nature. Forward-looking statements, by their very nature, are subject to inherent risks and uncertainties and are based on several assumptions, both general and specific, which give rise to the possibility that actual results or events could differ materially from our expectations expressed in, or implied by, such forward-looking statements and that our business outlook, objectives, plans and strategic priorities may not be achieved. These statements are not guarantees of future performance or events, and we caution you against relying on any of these forward-looking statements. Forward-looking statements are presented in this report for the purpose of assisting readers in understanding, in particular key elements of our modern slavery objectives, and in obtaining a better understanding of our anticipated operating environment. Readers are cautioned, however, that such information may not be appropriate for other purposes.

We have made certain operational and other assumptions in preparing the forward-looking statements contained in this report. In particular, our modern slavery objectives are based on a number of assumptions, including, without limitation, assumptions regarding sufficiency of internal and external resources; our ability to maintain effective modern slavery risk management systems and processes; the continuation of supportive stakeholder engagement and collaboration; continued effective management of modern slavery risks and other assumptions described in the “Forward-Looking Statements” sections of our most recent Global ESG Report, which sections are each incorporated by reference into this cautionary statement and which document is available on our website. If our assumptions turn out to be inaccurate, actual results or events could be materially different from what we expect.

Important risk factors that could cause actual results or events to differ materially from those expressed in, or implied by, the previously-mentioned forward-looking statements and other forward-looking statements contained in this report, include, but are not limited to factors such as: the failure to implement sufficient corporate and business initiatives; difficulty in accurately measuring, evaluating and disclosing our modern slavery risk management performance; our inability to collect modern slavery risk data from suppliers or the suppliers of acquired companies, including for historical years; as well as other risks detailed from time to time in reports filed by WSP with securities regulators or securities commissions or other documents that WSP makes public, which may cause events or results to differ materially from the results expressed or implied in any forward-looking statement.

Risk factors stated above and other risk factors that could cause actual results or events to differ materially from our expectations expressed in, or implied by, our forward-looking statements are discussed in this report as well as in WSP’s most recent annual Management’s Discussion and Analysis, which section is incorporated by reference into this cautionary statement.

WSP’s forward-looking statements are expressly qualified in their entirety by this cautionary statement. The forward-looking statements contained in report are subject to change. Except as may be required by applicable securities laws, we do not undertake any obligation to update or revise any forward-looking statements contained in this report.