



MODERN SLAVERY REPORT

Stantec Australia is committed to improving our practices to combat slavery and human trafficking and this statement comprises the slavery and human trafficking statement of Stantec Australia Pty Limited. It reflects our ongoing actions on this subject and supports our account for the financial year ending 30 June 2023 and would also be applicable to any other Australian entity in our group that might fall within the scope of the act from time to time.

About Stantec Australia Pty Limited

Stantec Australia is a professional services company operating in the sectors of water, energy and resources, environment, property and buildings, and transportation. Our practices unite engineers, consultants and architects to bring water and infrastructure projects to life. Stantec Australia is part of a global business group which has approximately 28,000 employees in 400 locations across six continents and engage in engineering, construction, financing and management of the world's largest and most significant water and natural resources projects.

All subsidiaries are ultimately owned by Stantec Inc, a Canadian based entity which is listed on the Toronto and NYSE.

Organizational Structure in Australia

Stantec Australia falls under the governance model of the Stantec Group. Ultimate governance responsibility sits with the Board of Stantec Australia and ultimately Stantec Inc. For Stantec Australia, this is supplemented by an Australian based leadership team consisting of Operational leads and HR, Legal & Risk, Finance, Health and Safety and Project Management. Stantec Australia's country manager reports to a Global Operations Director who reports to the Stantec Global CEO. All Stantec businesses operate under a common Risk Management Framework, Compliance policies and Project and Procurement Systems.

Stantec's operations include:

- Direct employment of workers, primarily in professional services roles, with provision of management services and specialist advisory staff
- Sub-contracting to entities and individuals to provide goods and services in support of our work

Our operational service categories include:

- Professional services
- Sub-contracted labour services (including some seasonal labour)
- Tax, legal, and other accounting
- Banking, payroll, insurances, and financial
- Office property occupancy, office consumables, and facility usage including security, cleaning, maintenance, and waste management

- Security services including personal, asset, and cyber security
- Hardware, software, and information technology (IT) services
- Telephone, internet, and office equipment
- Travel, logistics, courier, transportation, hospitality, and motor vehicles including rental and leased vehicles
- Health and insurance
- Construction and construction management services
- Technical advisory assistance

Stantec Australia provides integrated services to public and private sector clients, including engineering solutions for civil, structure, water and wastewater, utilities, geotechnical, traffic and transport, provision of surveying, asset planning and management, geographical information systems and mapping; environmental services; and project and contract management, site supervision, and advisory services.

Business units are located across the region serving local communities, and delivering services for regional, state, and federal government programs as well as private sector clients.

Policy Framework

Stantec's management of modern slavery risks falls within its overall approach to Corporate Integrity and protecting human rights.

The foundation policy documents governing Stantec's approach to Conduct and human rights protection are:

- Code of Conduct
- Modern Slavery and Human Trafficking Policy
- Due Diligence Checklist for Partner Operations
- Whistle-blower Policy

Risk of Modern Slavery in our Supply Chain

Our supply chains include professional services firms acting as sub-consultants (in the delivery of professional services and works), as well as individual sub-consultants and suppliers of services, goods and equipment to our offices. We also work with partner companies from time to time.

We are committed to the aim of taking all reasonable steps to try and eradicate modern slavery or human trafficking from our supply chains or any part of our business. Our Code of Business Conduct reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls which try to eliminate slavery and human trafficking.

As part of our initiative to identify and mitigate risk we have a due diligence process consisting of the following:

- Code of Business Conduct which sets out the group's approach to conducting business ethically and within the applicable laws.
- Specific Ethics and Compliance department which monitors our global compliance.
- Integrity Hotline for our employees and sub-consultants acting on our behalf to report any suspected violation of our policy

2022/2023 Performance

DUE DILIGENCE

Supplier due diligence assessments are required. These were recently updated to include reference to slavery-risk and additional surveys for high-risk suppliers. Due diligence is not intended to preclude suppliers; rather it is used to identify gaps in a supplier's ability to meet policy requirements including those relating to slavery risk. Gaps may be closed through the use of controls, additional contract clauses, adjustments to scopes of work, performance guarantees, commitments to adopt policy, or additional resources.

RISK ASSESSMENTS

New projects are required to conduct risk assessments to cover a range of safeguards and human rights issues.

CONTRACT TEMPLATES

All Stantec contract templates include explicit reference to modern slavery along with inherent requirements regarding supplier induction and policy acknowledgment; disclosures and reporting; due diligence; interlinkages with fraud and bribery; and warranties.

We continue to monitor and review of the effectiveness of the steps we have taken to date to ensure that there is no slavery or human trafficking in our supply chains. We intend to combat slavery and human trafficking further by closely working with our established compliance team which consists of representatives from our procurement, commercial, human resources and legal department as well as the operations team. The team developed and continues to develop a process to analyse existing structures and supply chains better and establish a framework to monitor internal compliance as well as our supply chain's compliance. As such, the compliance team continues to:

- Carry out audits of any high-risk elements of our supply chain and add compliance with the Modern Slavery Act as part of our subcontract qualification process.
- Work with our agency staff to ensure at least minimum wages are paid to agency staff and no tie-ins or service charges exist,
- Undertake occasional spot checks or on-site assessments.

Modern Slavery awareness building and training

Stantec is early in its journey to enhance its efforts to reduce the risk of modern slavery in our operations and supply chains. Thus, as part of our roadmap, our efforts this past year have been focused on raising awareness among our staff for what modern slavery is; the possible ways in which modern slavery may manifest itself within Stantec's operations and supply chains; what our newly developed and updated policies regarding modern slavery include and communicating to our leaders, supervisors, and staff their responsibilities regarding reducing the risk of modern slavery.

We have developed and will roll out over the next two years, compulsory awareness training modules which will be delivered in person.

This Statement was approved by the Board of Stantec Australia Pty Limited on 30 June 2023.

Signed:



Ashok Sukumaran
Director and Country Manager