



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 31 December 2023 in accordance with the 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 part of a global design and delivery leader in sustainable engineering, architectural, planning, and environmental services. Our goal is to remain a top tier global design firm that maximises long-term, sustainable value for all our stakeholders.

We're designers, engineers, scientists, and project managers, innovating together at the intersection of community, creativity, and client relationships. Balancing these priorities results in projects that advance the quality of life in communities across the globe.

As a business, we always work to the highest professional standards and comply with all laws, regulations and rules applicable to our business. Corporate social responsibility is an underlying part of our culture, and we strive to make a meaningful and positive impact on the communities in which we live and work.

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

Organisational 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. Stantec Australia has a number of non-operating subsidiaries in Australia. For the most part these companies share a common Board, management and policies with Stantec Australia. The Boards of these companies have been consulted with regards to this Statement.

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.

Policy framework

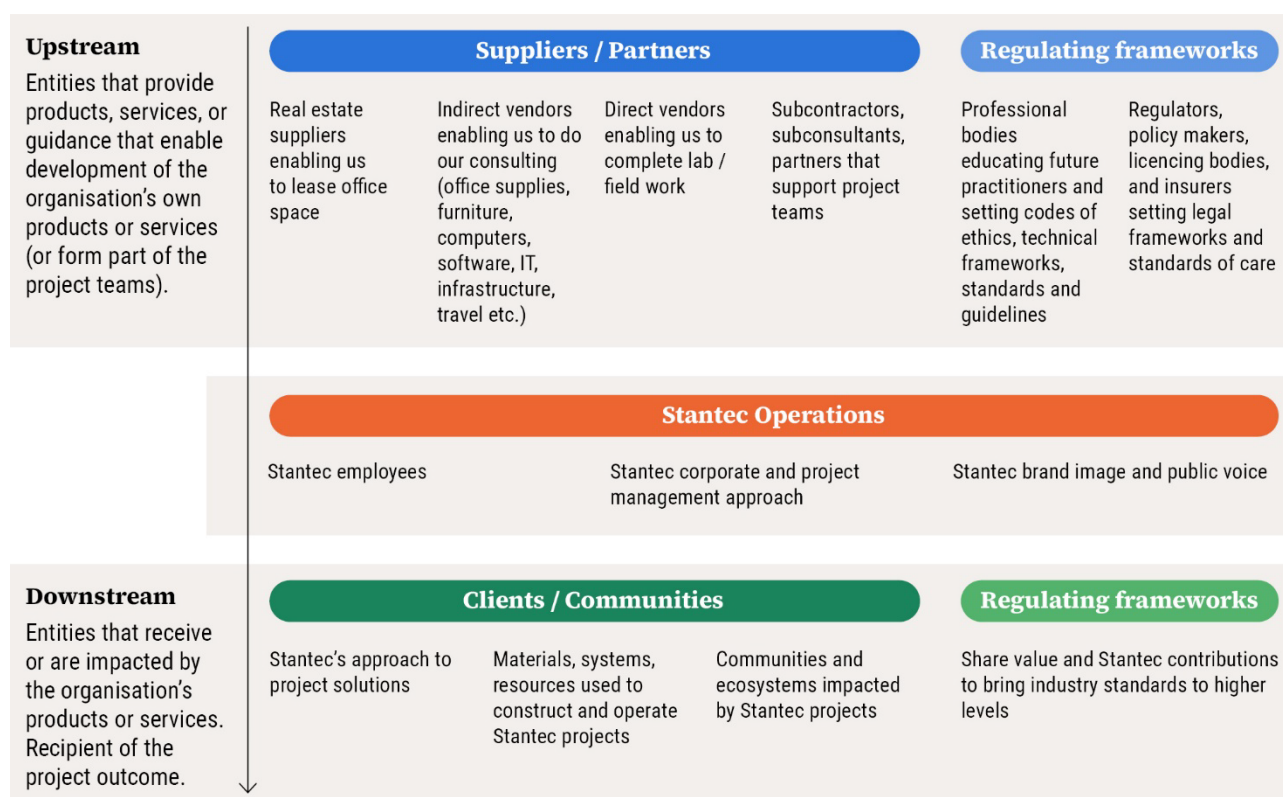
Stantec's management of modern slavery risks falls within its overall approach to Corporate Integrity and protecting human rights.

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

Upstream, our value chain includes the suppliers and partners that contribute to development and delivery of Stantec's services. Downstream, our value chain includes the clients and communities that are impacted by our services and the results thereafter.



As a large global company, we recognise that our purchasing decisions can influence positive change. While centralisation and standardisation of Stantec's global supply chain management programs continue to evolve, we leverage supply chain decisions to encourage sustainable business practices, promote small and diverse businesses, and support local businesses around the world.

We also recognise that our ability to influence positive change carries a responsibility to ensure that our upstream providers source resources in a safe, responsible and equitable manner. Stantec selects vendors, subcontractors, subconsultants, and partners who practice ethical and sustainable behaviours. As appropriate, we influence our supply chain with our Partner Code of Business Conduct, which details our values, standards, and expectations. Stantec indirect suppliers are managed by a corporate Procurement and Real Estate team and include providers of building leases, vehicle fleets, IT equipment, and office supplies.

Modern slavery risks are determined by a number of factors including sector, geography, products, services, and business model. Key to understanding these factors is evaluation of risks across the operations and supply chain of a company. The following are the key modern slavery risk areas in the Stantec supply chain:

- Direct procurement
- Indirect procurement
- Procurement of building services

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.

We continue to refine and update our policies to address the risks of modern slavery and human trafficking throughout our governance process, including the following corporate policies:

- **Human Trafficking and Modern Slavery Policy:** We have recently updated our Human Trafficking and Modern Slavery Policy (the “Policy”) to address risks relating more specifically to Stantec’s supply chain and procurement practices. We value the rights of all humans and consider this as important as a stop work authority safety issue. We are also clarifying Stantec’s ability to carry out due diligence and audits in situations where any contractors, suppliers or other business partners are at risk for noncompliance with the laws or are suspected of being engaged in human rights violations.
- **Human Rights Policy:** Stantec’s Human Rights Policy outlines our commitment to ensuring that human rights are respected in accordance with the principles and guidance contained in the United Nations (“UN”) Guiding Principles on Business Human Rights, the International Bill of Human Rights, the International Labour Organisation Declaration on Fundamental Principles and Rights at Work, the UN Universal Declaration of Human Rights and the OECD Guidelines for Multinational Enterprises. The Human Rights Policy sets an expectation that all Stantec employees, subconsultants, and suppliers will adhere to human rights principles consistent with our own, including a prohibition on forced, trafficked and child labour.
- **Modern Slavery and Human Trafficking Statement (UK):** Since 2017, Stantec has issued an annual Modern Slavery and Human Trafficking Statement in compliance with the United Kingdom’s Modern Slavery Act 2015. This Statement reaffirms Stantec’s commitment to continuing to improve our practices to combat slavery and human trafficking in our supply chain. The Statement also provides a high-level overview of the policies, processes and resources that Stantec uses to assess and address risks relating to modern slavery and human trafficking.
- **Partner Code of Business Conduct:** Our Partner Code of Business Conduct (the “Partner Code”) outlines the principles and values that Stantec expects its partners and subconsultants to uphold at all times relating to various matters including anti-bribery and corruption, child and forced labour and human rights. The Partner Code gives Stantec the ability to investigate and examine the records of our partners to verify compliance.

Stantec is also a signatory to the United Nations Global Compact, which confirms our commitment to its ten principles, including the elimination of all forms of forced and compulsory labour and effective abolition of child labour.

From a diligence perspective, Stantec maintains its Integrity Hotline for our employees and sub-consultants acting on our behalf to report any suspected violation of our policies and which is accessible in several local languages.

Keeping our people up to date with their obligations to uphold the highest levels of ethical conduct is imperative to our business. By remaining vigilant and encouraging staff to actively report wrong-doing, or the suspicion of wrong-doing, we help to reinforce a strong ethical culture and our commitment to doing what is right.

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 resource 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 2024.

Signed:



Ashok Sukumaran
Director and Country Manager