



Modern Slavery *Statement*

WSP Australia Pty Limited
2021



Introduction

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

Our Commitment

WSP AU is committed to maintaining the highest standards of ethics and integrity through its business and relationships.

WSP AU has a zero-tolerance policy in relation to any form of servitude, forced or compulsory labour, child labour, sexual exploitation, forced marriage or human trafficking ("**Modern Slavery**") and is committed to doing its utmost to implement and enforce systems and controls to ensure that violations of fundamental human rights are not occurring in our own business or within our supply chain. This commitment is enforced by the *WSP Human Rights Policy* and the *WSP Code of Conduct*.

About WSP

WSP AU is one of the world's leading engineering professional services consulting firms. We are dedicated to our local communities and propelled by international brainpower. We employ technical experts and strategic advisors including engineers, technicians, scientists, planners, surveyors, environmental specialists, as well as other design, program and construction management professionals.

We design lasting solutions in the Transport & Water, Property & Buildings, Earth & Environment, and Mining & Power sector as well as offering strategic Advisory, Engagement & Digital services.

All WSP AU operations are ultimately owned by WSP Global Inc. ("**WSP Global**"), a Canadian company listed on the Toronto Stock Exchange. With approximately 54,000 employees globally, we engineer future-ready projects where society can thrive. In Australia, we bring together approximately 3,070 talented people across 12 offices. WSP AU's head office is located at Level 27, 680 George Street, Sydney, Australia.





Pictured: Australian offices

Australian Operations

WSP AU's focus is to act locally while harnessing WSP's Global knowledge. WSP AU's clients are government agencies, public and private companies. Our operations are governed by the *WSP Code of Conduct* and underlying policies and procedures in accordance with our governance structure. The scope and nature of WSP AU's business model mean that WSP AU's operations and supply chain is less acquiescent to modern slavery practices than companies that operate in other sectors.

Supply Chain

In compliance with the Act, WSP AU conducted a thorough risk assessment of its supply chain to identify industries, products, and countries that are part of the WSP AU supply chain and considered high risk for Modern Slavery. Published indexes, such as the [Global Slavery Index](#) and the [Corruption Perceptions Index](#), were used for this exercise.

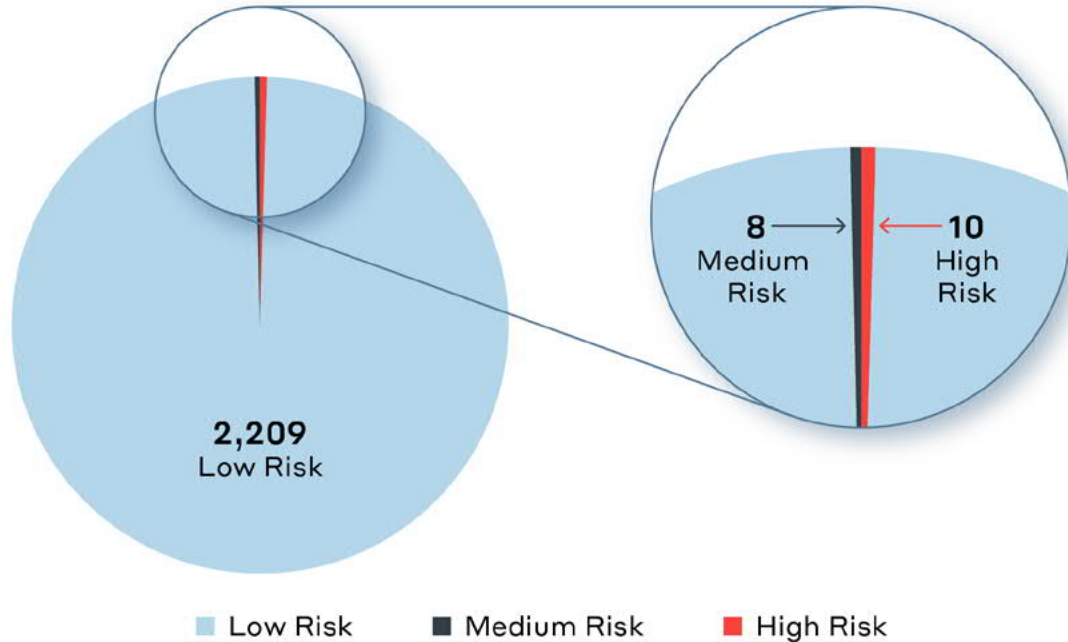
The risk assessment concluded that the majority of services supplied to WSP are professional consultancy services sourced from the local Australian market and, consequently, considered low-risk services.

Medium to high-risk suppliers were identified in relation to cleaning, couriers and recruitment services and vehicle and/or equipment hire, and in the procurement of IT hardware, office and catering supplies. These, however, form the minority of the WSP AU's supply chain.

The 2020 risk assessment of the supply chain also revealed that only 0.4% of all WSP AU'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). Furthermore, 80% of these suppliers provide professional sub-consultancy services (considered low-risk).

WSP AU often partners with other professional services firms to form Alliances or Joint Ventures.

WSP Suppliers - Modern Slavery Country Risk



Due diligence enquiries are always conducted to ensure that WSP AU partners are companies that uphold similar ethical standards, including zero-tolerance to Modern Slavery. WSP recognises the importance of the Modern Slavery risk assessment and its role in minimising Modern Slavery risk in Australia.

Actions Taken Against Modern Slavery

The processes implemented and actions taken by WSP AU to address Modern Slavery risks in its operations and supply chain are listed below.

1.1 Risk-based Approach

As explained above, WSP AU has established risk management processes for the identification, assessment, control and mitigation of Modern Slavery. Non-compliance with the Act presents a business risk, and it is therefore managed in line with the WSP AU risk management process.

Under the risk management process, vendors providing high-risk products or services or that are located in a high-risk country have to complete the WSP AU Modern Slavery Act Questionnaire (MSA Questionnaire) as part of the due diligence process.

1.2 WSP Policies

The following WSP Policies are currently in place and govern WSP AU's commitment to zero-tolerance to Modern Slavery:

- *WSP Code of Conduct*
- *WSP Third Party Code of Conduct*
- *WSP Human Rights Policy*
- *WSP Working with Third Parties Policy*
- *WSP High-Risk Countries and Sanctions Compliance Policy*

WSP reviews and updates its Policies regularly. WSP Policies are available to WSP employees and third parties [on our website](#).

1.3 Contractual Requirements

All suppliers are required to provide a declaration of compliance with the *WSP Code of Conduct* prior to engagement. Additionally, WSP AU's contract templates (**Agreements**) have been amended to include Modern Slavery provisions:

- Compliance with all applicable laws, statutes, regulations and codes prohibiting Modern Slavery in force in any jurisdiction where they conduct business activities;
- Compliance with the *WSP Code of Conduct*; and
- Providing prompt notification to WSP AU upon reasonably suspecting or becoming aware of any activity, practice or conduct that would constitute an offence of Modern Slavery.

WSP Agreements require each third party to warrant that:

- It does not and will not engage in conduct with would constitute an offence of Modern Slavery;
- It has not been convicted of any Modern Slavery Offences in Australia or elsewhere;
- To the best of its knowledge, no participant in its Supply Chain has engaged or participated, or currently engages or participates in Modern Slavery; and
- It has implemented due diligence procedures, sufficient to ensure no participant in its Supply Chain has engaged or participated or currently engages or participates in Modern Slavery.

WSP Agreements also include a termination right if the third party has been found by a competent authority to have committed a Modern Slavery offence or is otherwise in breach of Modern Slavery provisions under the Agreement.

1.4 Training

All WSP AU employees must undertake mandatory Code of Conduct training, including the annual Ethics and Code of Conduct refresher training. These include content pertaining to the Act.

Mandatory training completion rate is one of WSP AU's Key Risk Indicators (KRIs) which is reported to the Company Board quarterly.

1.5 Due Diligence

Due diligence enquiries are conducted concerning all of WSP AU's new business partners prior to engagement. In addition, WSP AU requested that our existing suppliers complete the MSA Questionnaire.

All relevant WSP AU employees are trained in the WSP procurement processes and due diligence activities, including compliance with the Act.

1.6 Grievance Mechanisms

WSP AU 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 AU 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.

1.7 Remediation

WSP will use its leverage to influence other entities to mitigate any risks of Modern Slavery.

WSP AU provides a remediation mechanism to its business partners in the way of an independent and anonymous whistle-blower hotline and dispute resolution provisions.

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

Effectiveness

The following measures are undertaken by WSP AU to assess the effectiveness of the actions to control Modern Slavery risks:

- WSP AU monitors and annually reviews its compliance with the Act and reports the results internally to the WSP AU leadership team
- Key Risk Indicators (KRIs) relating to compliance with the Act were established and are reported quarterly to WSP leadership, including:
 - Number of modern slavery training and awareness-raising programs delivered
 - Number of complaints registered through the whistleblowing hotline
 - Due diligence process compliance
 - Number of active investigations relating to breach of Code of Conduct and underlying policies (including Human Rights provisions)
- WSP AU's internal audit team will regularly conduct an internal audit of WSP's due diligence and procurement processes
- WSP AU will review the content of the Code of Conduct training annually to ensure it is current and fit for purpose, including compliance with the Act
- WSP AU will review the risk assessment process annually to ensure the definitions of high-risk products and high-risk countries align with the latest published index data.

Continuous Improvement

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

Board Approval

This WSP MSA Statement has been reviewed, approved and endorsed by the WSP AU Board of Directors on 03 June 2021.



Guy Templeton (Jun 3, 2021 18:03 GMT+10)

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