



# Modern Day 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 2022 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.

## **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

## **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 25,000 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.



# 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 conduct business ethically and within the applicable laws.
- Specific Ethics & 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

#### 2022/2022 FINANCIAL YEAR PERFORMANCE

- Our sub-consultancy agreements and contracts contain obligations which require our subconsultants and contractors to confirm their compliance with modern slavery and human trafficking laws.
- We continue to review our supply chains on specific projects and make commitments to our clients with respect to ensuring that Stantec Australia was not undertaking any practices which breached the Modern Slavery Act.
- All recruitment and labour hire agreements require that our providers comply with all modern slavery and human trafficking laws

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.
- Works with our agency staff providers 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.

This Statement was approved by the Board of Stantec Australia Pty Limited

Ashok Sukumaran Director and Country Manager 30 June, 2021

Date Reviewed and Signed