

Modern Slavery Act Statement

INTRODUCTION

Around 40 million people worldwide are victims of slaveryⁱ in its various modern forms.ⁱⁱ Consistent with the UN's position, WSP recognises the critical role of private sector in ending slavery,ⁱⁱⁱ and the obligations imposed by the Modern Slavery Act 2015 in the UK and similar legislation elsewhere. WSP is therefore proud to publish details of the steps it has taken in 2023 to ensure that slavery is not taking place in its business and in its supply chains.^{iv}

WSP'S STRUCTURE, OPERATIONS AND BUSINESS MODEL IN THE UK

WSP is a global business with more than 66,000 employees in 40+ countries. The worldwide business is ultimately owned by WSP Global Inc., a Canadian company listed on the Toronto Stock Exchange.^v WSP's principal subsidiary in the UK is WSP UK Limited, which operates both nationally and globally.

WSP develops creative, comprehensive and sustainable engineering solutions for a future where society can thrive. Our work includes engineering iconic buildings, designing sustainable transport systems, developing clean energy, restoring the environment, and much more. WSP's principal clients are public bodies, private companies and financial institutions.

As a highly specialist professional services company, WSP's primary inputs in the UK are its highly-skilled staff, the complex IT equipment and systems that its staff uses, the offices at which its staff work, and various ancillary travel and professional services. The suppliers of the UK 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.

PRACTICAL STEPS TAKEN AGAINST SLAVERY

The scope and nature of WSP's business model, activity and footprint means that WSP's business and supply chain is less amenable to slavery-sustaining practices than those many other companies even within the built environment sector. Nonetheless, WSP continues to take practical and proportionate steps to ensure that slavery does not take place in WSP's business and supply chain. These steps have consisted *inter alia* of:

- **Proportionate Procedures:** WSP in the UK has maintained proportionate procedures to identify and exclude slavery from its business and supply chain. (A number of those procedures are described below). The task of establishing and reviewing the effectiveness of those procedures has been consolidated in Ethics & Compliance function, with due support from the Human Resources, Procurement and Health & Safety functions.
- **Top-Level Commitment:** the leadership of WSP in the UK has signalled its commitment to excluding slavery by ensuring that the Ethics & Compliance function continues to be adequately resourced as the UK business grows, has autonomous reporting lines to the global board of WSP and is empowered to investigate allegations that may be raised about misconduct or concerns, including ones relating to modern slavery, in an independent and confidential manner.
- **Risk Assessment and Due Diligence:** WSP has continued to ensure its approach changes as its business has grown and changed. WSP UK describes its main risks of exposure in its Slavery Prevention Policy. Slavery risk assessment and management is included in corporate transactions and integrations. Further, prospects and projects in geographic markets that

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- present an elevated level of slavery risk are typically subject to an elevated level of scrutiny and approval at a regional and global level. This typically includes a review by the Ethics and Compliance function and additional slavery risk mitigants (where appropriate).
- **Client Engagement:** WSP continues to respond to any client queries and assessments of its modern slavery exposure and corresponding responses.
- **Employee Engagement:** Upon joining the company, all full-time employees are issued training on WSP's global *Code of Conduct*, which lays out the company's core position on modern slavery and links to its relevant policies.^{vi} In 2023, in order to provide targeted, practical guidance to our staff on this topic, WSP UK also published an article listing *key practical signs and situations of modern slavery that WSP employees may realistically encounter*, in light of the scopes of work we engage in. This tool has since been used in other regions of WSP as well, and has been viewed over 700 times, as well as being used in team meetings as an Ethics Share.
- **Hiring practices:** WSP maintains a comprehensive HR function to ensure that its staff and temporary/contract workforce are employed fairly, freely and lawfully. We recognize that the hiring and supervision of our contingent workforce is the higher risk aspect of our operation, and have accordingly built a long-term relationship with a third party provider to manage this topic. Our master vendor agreement with that provider was renewed in 2023, following a thorough benchmarking of the provider's services against its peers in the market, and a thorough vetting of their compliance with applicable laws and related best practices, such as the UK Modern Slavery Act.
- **Health, Safety & Wellbeing** – WSP develops and monitors mandatory controls and guidance around working hours and fatigue management, in compliance with local laws, industry regulations and best practices, and client requirements.
- **Supply Chain Engagement:** In 2023, WSP combined several documents into a single simplified Business Partner Code of Conduct,^{vii} which includes a section on "Human Rights and Equality" that requires compliance with all applicable modern slavery and trafficking laws. WSP has otherwise continued to operate its procurement activities following the changes instituted in 2022, including 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.
- **Monitoring and Review:** The Slavery Prevention Policy seeks to ensure that WSP's procedures are practical, proportionate and clear; it was reviewed and updated in December 2021, and last reviewed in January 2023.
- **Public Engagement:** WSP has published its *Modern Slavery Act Statement* and its *U.K. Slavery Prevention Policy*^{viii} on its website at www.wsp.com. WSP in the Middle-East also worked with regional resources, including in the UK, to respond to an international NGO's industry survey on the subject.

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- **Identifying and Responding to Concerns:** an independent company operates a Business Conduct Hotline on WSP's behalf. WSP encourages employees, suppliers, clients and the public to report concerns ("blow the whistle") about slavery in WSP's business or its supply chain via the Business Conduct Hotline. The Business Conduct Hotline can be contacted via <https://wsp.ethicspoint.com/>. WSP also does not preclude the use of other (industry or client) reporting helplines.

CONTINUING TO IMPROVE

WSP anticipates that the practical steps described above will continue to be followed in 2024. We continue to be informed by the best practice and analysis of our sector, our clients, our suppliers and of anti-slavery practitioners.

This statement will be valid until 30 June 2025.

WSP welcomes constructive engagement with all stakeholders to increase the effectiveness of its anti-slavery activity.

APPROVAL BY THE BOARD

The board of directors of WSP UK Limited approved this slavery and human trafficking statement for the financial year ending 31 December 2023 at a meeting held at 6 Devonshire Square, London, EC2M 4YE on 18 January 2024.

A handwritten signature in black ink that reads 'M.W. Naysmith'.

Mark Naysmith
Statutory Director and UK Chief Executive Officer
WSP UK Limited
18 January 2024

ⁱ Page 9, *Global estimates of modern slavery: forced labour and forced marriage*, International Labour Organization and Walk Free Foundation, 2017, last accessed online ([link](#)) on 11 Dec 2019.

ⁱⁱ For the purposes of WSP's activity to ensure that slavery does not take place within its UK business or supply chain, WSP identifies the principal forms of slavery as forced labour, child labour, sexual exploitation, servitude, forced marriage and the ancillary activity of human trafficking.

ⁱⁱⁱ Page 12, *Global estimates of modern slavery: forced labour and forced marriage*, International Labour Organization and Walk Free Foundation, 2017, last accessed online ([link](#)) on 11 Dec 2019.

^{iv} This statement is published by WSP UK Limited (a company registered in England & Wales, company number 01383511) on behalf of itself, and all subsidiaries of those companies to the extent they are a "commercial organisation" as defined by section 54(2) of the UK's Modern Slavery Act 2015. The financial year of those companies runs from 1 January to 31 December of each year. The publication of this statement discharges the obligations (if any) of those companies under section 54(1) of the Modern Slavery Act 2015.

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^v For detailed information on WSP's workforce, activities and financial performance, see WSP's global website at www.wsp.com

^{vi} WSP's global *Code of Conduct* can be found on WSP's website ([link](#)).

^{vii} WSP's global *Business Partner Code of Conduct* can be found on WSP's website ([link](#)).

^{viii} The publicly-accessible version of the *Slavery Prevention Policy* excludes certain confidential, market-sensitive and/or personal information.