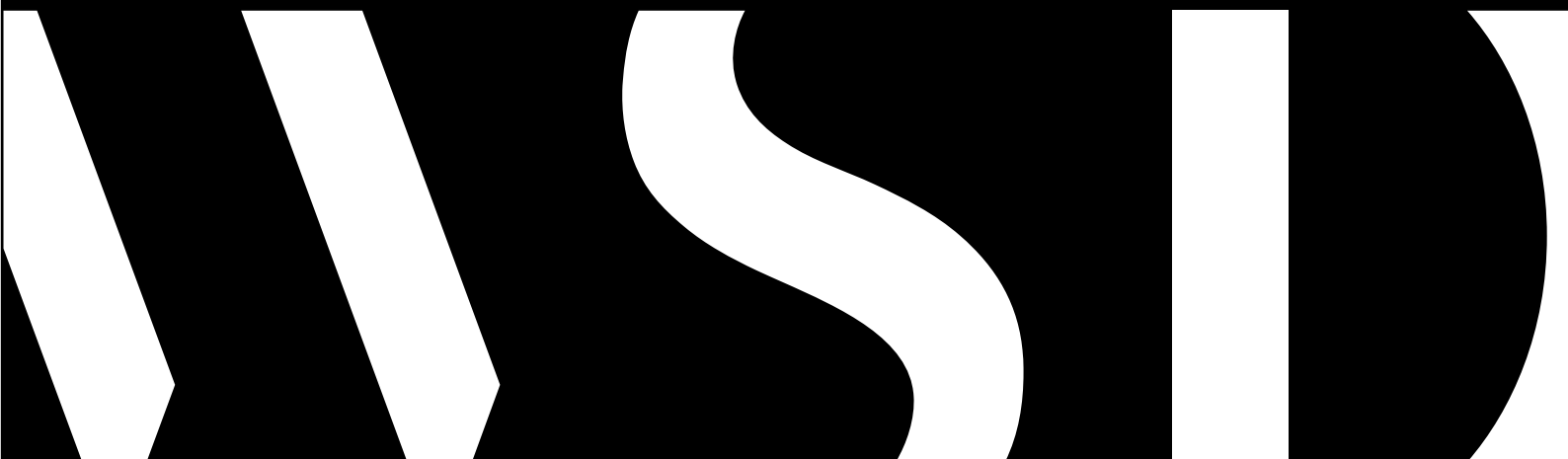




# MODERN SLAVERY REPORT

## 2025

May 2026





# 2025 MODERN SLAVERY REPORT

## 1. INTRODUCTION

This report relates to WSP Global Inc. (“**WSP Global**”) and its subsidiaries (collectively, “**WSP**”, “we” “us” or “our”), including specifically WSP Australia Pty Limited (“**WSP Australia**”), WSP UK Limited (“**WSP UK**”) and WSP Norge AS (“**WSP Norway**”), during the reporting period from January 1, 2025, to December 31, 2025, unless otherwise indicated in this report and where required by the context. It outlines the actions taken by WSP to address the risks of modern slavery, including, but not limited to, forced labour and child labour in its operations and supply chains, as required by the laws<sup>1</sup> implemented in Australia, the United Kingdom (the “**UK**”) and Norway. WSP recognizes the critical role of the private sector in ending modern slavery, and is therefore publishing the details of the steps it has taken in 2025 to prevent and reduce the risk that modern slavery is used in its own operations, as well as in its supply chains.

## 2. OUR COMMITMENT

WSP has a zero-tolerance policy in relation to any form of modern slavery. We prohibit our people from engaging in, suggesting, allowing or ignoring situations of modern slavery in the conduct of our business. This commitment is implemented through our Human Rights Policy and Code of Conduct (each as further described below). As a signatory to the United Nations Global Compact, we have committed to implementing the Ten Principles on human rights, labour, environment and anti-corruption and contributing to the United Nations Sustainable Development Goals. We also implement appropriate risk mitigation controls in relation to projects in countries with potentially higher modern slavery risk.

WSP welcomes constructive engagement with all stakeholders, including suppliers, governmental authorities and clients, to increase the effectiveness of its modern slavery risk mitigation practices. WSP will continue to adapt to maintain the highest standards of ethics and integrity in its business and relationships.

## 3. DESCRIPTION OF WSP

### Global Structure and Activities

WSP is a global business with approximately 82,500 employees and operates in over 50 countries as at March 27, 2026. WSP Global is a corporation existing under the *Canada Business Corporations Act* and is the ultimate parent company of the WSP group of companies. WSP Global’s registered and head office is located at 1600 René-Lévesque Boulevard West, 11<sup>th</sup> Floor, Montreal, Quebec, H3H 1P9. WSP Global’s common shares are listed on the Toronto Stock Exchange (TSX: WSP).

As one of the leading professional services firms in the world, WSP unites its engineering, advisory and science-based expertise to shape communities to advance humanity. It provides solutions and delivers innovative projects in the transportation, infrastructure, environment, building, energy, water, and mining and metals sectors. WSP’s principal clients include public bodies, private companies and financial institutions. WSP’s global experts include advisors, engineers, environmental specialists, scientists, technicians, architects and planners, in addition to other design and program management professionals.

In all of its jurisdictions of operation, WSP’s primary inputs are its highly skilled employees, the complex IT equipment and systems that its employees use, the offices where they work, and various ancillary travel and professional services.

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<sup>1</sup> *Modern Slavery Act 2018 (Cth) (Australia) (the “**Australian Act**”); Modern Slavery Act 2015 (UK) (the “**UK Act**”); and Norwegian Transparency Act.*



## Entities Subject to Modern Slavery Disclosure Requirements

WSP's operations in the following jurisdictions are subject to modern slavery disclosure requirements:

- **Australia:** WSP's principal subsidiary in Australia is WSP Australia, a corporation incorporated in accordance with the laws of the Commonwealth of Australia, and includes all its subsidiaries operating in Australia. WSP Australia operates nationally and globally, and its principal clients are public bodies and private companies. In Australia, we bring together approximately 4,900 talented people<sup>2</sup> across 24 offices, with the head office located at Level 27, Ernst & Young Center, 680 George Street, Sydney NSW 2000.
- **UK:** WSP's principal subsidiary in the UK is WSP UK, which operates nationally and globally. In the UK, we bring together approximately 11,800 talented people across 45 offices, with the head office located at WSP House, 70 Chancery Lane, London WC2A 1AF.
- **Norway:** WSP's only subsidiary in Norway is WSP Norway, which operates nationally and globally. WSP Norway's principal clients are primarily public bodies and private companies. In Norway, we bring together approximately 400 talented people across 12 offices, with the head office located at St. Olavs plass 5, 0165 Oslo.

Refer to the "Ricardo Limited" section below for more information about WSP's acquisition of Ricardo (defined herein) and its integration into WSP's operations.

<sup>2</sup> This number does not include our operations in the Philippines.



## Our Operations – Exposure to Modern Slavery and Mitigations

WSP aims to provide a working environment in which all individuals are treated fairly, with dignity and respect, and free from harassment, discrimination, bullying, racism and violence. We comply with applicable employment and labour laws, regulations governing employer-employee relations as well as our collective agreements. We are also committed to the health and well-being of our employees, including their physical, mental, and emotional health, financial security, and sense of belonging.

We make decisions involving recruitment, hiring, compensation, development and promotion based solely on merit, ability and performance. We pay fair wages and benefits so our employees enjoy a decent standard of living. We encourage them to maintain a good work-life balance by promoting a flexible work environment consistent with our client delivery needs. We respect our employees' freedom to join any association or union they choose, provided that local law is not violated, as well as the right to collective bargaining, as applicable. We prohibit our people from engaging in or ignoring all forms of modern slavery, including forced labour, child labour, sexual abuse or exploitation and human trafficking.

WSP Australia, WSP UK and WSP Norway prioritize transparency and fairness in all hiring activities, whether managed internally or through external recruitment agencies. They regularly monitor and evaluate market conditions to uphold fair wage practices and comply with each of their local laws. Less than 10% of each of their respective workforces are agency workers. These agency workers provide professional services and are generally domestically based.

## Our Supply Chain – Exposure to Modern Slavery and Mitigations

WSP's Global Procurement team is responsible for streamlining procurement practices, developing governance standards and a global procurement strategy. The Global Procurement team is also responsible for managing major contracts benefiting the global company's corporate functions. Subregional<sup>3</sup> or country procurement teams are responsible for sourcing and procuring goods and services under subregional/country and global supplier agreements, as well as developing subregional/country procurement strategies.

The scope and nature of WSP's business model and activities and jurisdictions of operation, being primarily the provision of professional services in OECD countries, generally limits exposure to modern slavery risks in its supply chain.

- **UK, Norway and Australia:** The vast majority of active suppliers of each of the UK, Norwegian and Australian businesses are located, respectively, in (i) the UK, (ii) Norway or elsewhere in Europe, and (iii) Australia, with a few suppliers located outside of their respective home countries. Their suppliers are principally professional services companies, IT providers, landlords, a variety of service providers, and entities controlled by WSP. WSP Australia also supplies goods used in groundwater remediation systems and CCTV cameras that are operated on client sites.

## 4. POLICIES

The following WSP policies reinforce WSP's commitment to addressing modern slavery:

### Code of Conduct

Our global Code of Conduct applies to WSP, to all employees, directors, officers and others in an employment-type relationship with WSP and highlights everyone's responsibility to respect and promote human rights and equal opportunity. The Code of Conduct explicitly prohibits all forms of modern slavery, including forced labour, child labour, sexual abuse or exploitation and human trafficking.

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<sup>3</sup> In this report, where we use the term "regions", we are referring generally to WSP's reportable segments: Canada, Americas (USA and Latin America), EMEIA (Europe, Middle East, India and Africa) and APAC (Asia Pacific – Asia, Australia and New Zealand). Where we use the term "subregions", we refer to a further breakdown of regions which includes Canada, the USA, Latin America and the Caribbean, the UK and Ireland, Central Europe, Nordics, the Middle East, India, Africa, Australia, New Zealand and Asia.



## **Business Partner Code of Conduct**

Our global Business Partner Code of Conduct outlines our expectation that our business partners<sup>4</sup> will, among other things, adopt policies and practices that safeguard human rights in all their dealings, not engage in or with any form of modern slavery and comply with applicable modern slavery and human trafficking laws and regulations. The Business Partner Code of Conduct also states our expectations that business partners must promptly report any suspected violations of these principles to WSP.

## **Human Rights Policy**

Our global Human Rights Policy sets out our global approach to respecting, supporting and safeguarding human rights. The policy applies to WSP and to all employees and other persons in an employment-type relationship with WSP, as well as business partners acting on our behalf.

## **Health and Safety Policy**

Our global Health and Safety Policy sets out our commitment to proactively identify, prioritize and strive to eliminate actual and potential health and safety hazards or effectively control them and minimize the risks associated with our activities. We demonstrate our commitments to health and safety by promoting compliance with the requirements of ISO 45001:2018 Health and Safety Management System or similar certifications, as well as promoting compliance with legal, statutory and regulatory requirements, and industry standards as applicable to WSP activities.

## **Reporting, Investigations, and Anti-Retaliation Policy**

Our global Reporting, Investigations, and Anti-Retaliation Policy describes how we implement sound governance in internal investigations, in particular highlighting the obligation of employees to report misconduct and our zero-tolerance policy for retaliation against those who make a report. This policy also describes different options to make a report, including our worldwide third-party Business Conduct Hotline, which can be used anonymously if permitted by applicable law.

## **Procurement Guidelines**

Our procurement function adheres to our global Procurement Guidelines. These guidelines are in place to set the course for an ongoing exercise of aligning policies, procedures and structures across our subregions. We aim to receive best value for the goods and services required for our operations while mitigating any negative impacts on the environment and local communities, including human rights, through fair, transparent, consistent, cost-effective and cost-efficient procurement procedures. To foster compliance with these objectives, the general principles of accountability, transparency, honesty, integrity and equity must guide the procurement process.

Our Board of Directors, together with the Governance, Ethics and Compensation Committee, is responsible for overseeing and monitoring implementation of procedures, policies and initiatives relating to sustainability, as well as health, safety, environment and quality risks, rules and regulations.

## **High-Risk Countries and Sanctions Compliance Policy**

Our global High-Risk Countries and Sanctions Compliance Policy lists the countries and regions deemed high risk for business ethics, and establishes requirements and governance to conduct business in such locations. As part of the related process, clients and business partners operating in high-risk locations are subject to a rigorous due diligence process regarding sanctions and debarment, and through a risk-based model, are also assessed for concerns regarding their reputation and human rights violations.

Several of our subregions/countries also have local policies and procedures that complement these global policies. For example, WSP UK adopts procedures in relation to modern slavery risk and provides further guidance to employees through

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<sup>4</sup> In the Business Partner Code of Conduct, "business partners" are defined as all persons engaged to act on behalf of or in partnership with WSP, including representatives or sponsors; joint venture, consortium, or equity partners; and service providers such as suppliers, vendors, consultants, subconsultants, contractors and subcontractors; and their employees or persons acting on their behalf.



its Slavery Prevention Policy (as further described below). WSP UK, WSP Australia and WSP Norway's supplier contract terms and conditions include modern slavery provisions and/or reference our Business Partner Code of Conduct and WSP continues to roll out similar supplier contract terms and conditions globally.

## UK Slavery Prevention Policy

The UK Slavery Prevention Policy describes to staff and stakeholders, in practical, operational terms, the main forms of slavery, the sectors, activities and countries where there is a higher likelihood of encountering slavery practices, where such practices may arise in WSP UK's business, and how WSP UK manages these risks. It also includes a reference to a subject-matter expert in the business and the reporting lines available to signal observed or suspected incidents of modern slavery.

## 5. DUE DILIGENCE PROCESSES

WSP maintains proportionate due diligence processes and other procedures to identify and exclude modern slavery from its operations and supply chain. The task of establishing and reviewing the effectiveness of those procedures is led by the Global Ethics and Integrity function, with support from the Human Resources, Procurement, and Health, Safety, Security, Environment and Quality functions. A number of these due diligence processes and other procedures are described below.

**Work in high-risk locations** – We have a rigorous process to assess and approve opportunities for projects in countries with higher risks, including higher risk of modern slavery, through our High-Risk Countries and Sanctions Compliance Policy. Any opportunity, client or third party located in a known high-risk country undergoes a rigorous due diligence process and must be approved by an Ethics and Integrity team and, where higher risk is present, applicable executive management must also provide its approval. The due diligence and review process includes assessing modern slavery risk and implementing the appropriate mitigation measures.

**General processes and procedures** – Our third-party onboarding and vetting processes allow us to conduct targeted due diligence on our suppliers prior to doing business with them and consider factors such as ethics, sanctions, integrity and adverse media in our risk evaluation, enhanced by subregion-specific checks. When the initial vetting identifies a significant concern or risk of modern slavery, the supplier undergoes an elevated screening conducted by our Ethics and Integrity teams. This integrity review includes an assessment of the risk not only from the supplier's vetting results but also considers the nature of the goods or services that the supplier is contracted to provide us. We expect our business partners to follow the standards set out in our Business Partner Code of Conduct when they conduct business for, on behalf of or in partnership with WSP. A vast majority of our business partners have signed onto our Business Partner Code of Conduct. In addition, in certain cases where higher risk is present, business partners are required to complete a due diligence questionnaire.

As part of the ongoing rollout of our global enterprise resource planning system, once fully implemented, this system will allow the sharing of risk evaluation data between corporate functions involved in the onboarding process and allow greater transparency regarding approved business partners.

- **UK:** WSP UK uses the global enterprise resource planning system, whereby third parties receive a self-registration form that triggers their vetting, as described above. Compliance with the UK Act is included in the self-registration form and any red flags in response to this set of questions is referred to the regional Ethics and Integrity team for resolution prior to onboarding. When the UK uses a supplier onboarded by another region, UK-specific questions, including compliance with the UK Act, are still submitted and compiled through direct outreach to such supplier. WSP UK maintains a supplier microsite that facilitates communication with suppliers and includes pertinent documents on modern slavery prevention, including our Business Partner Code of Conduct and the UK Slavery Prevention Policy.
- **Norway:** WSP Norway uses its national supplier onboarding processes, whereby third parties provide information that triggers the due diligence process described above. Any red flags identified are referred to the regional Ethics and Integrity function for further review and assessment before onboarding is completed. When WSP Norway engages a supplier onboarded by another WSP region, Norway-specific questions are addressed through direct outreach to such supplier. Suppliers are directed to our global governance documents, including the Business Partner Code of Conduct, which outlines WSP's expectations regarding modern slavery prevention.



- **Australia:** WSP Australia uses its national supplier onboarding processes, whereby third parties are required to respond to a set of modern slavery-related questions, regardless of size or location. These responses are reviewed by the Ethics and Integrity Team before onboarding is completed and are used to identify potential risks of modern slavery. This process supports WSP Australia's obligations under the Australian Act and its commitment to respecting and safeguarding human rights across its operations and suppliers.

## 6. RISK ASSESSMENT

### Global Risk Assessment

WSP has a global risk assessment process which covers a range of risks to its business and is reviewed on a quarterly basis, with regional assessments and group level consolidation conducted on a bi-annual basis. With respect to modern slavery risk, there are two key considerations: the scope of services rendered and the location where the services are provided. WSP's business primarily includes providing professional consultancy services in a variety of engineering, environmental and similar disciplines. These services are less vulnerable to modern slavery risk given the skill of the professionals providing such services. Therefore, the risk assessment focuses on the countries in which modern slavery is more prevalent. Global indices such as the Global Slavery Index are used to assess the countries included in WSP's high-risk countries list, triggering the supplementary due diligence processes outlined above.

In each subregion/country, a specific risk assessment may be required from time to time based on the profile of the business. For the reporting period, risk assessments were conducted for the following countries:

### Australia Risk Assessment

WSP Australia conducted a risk assessment of its supply chain in 2025 to identify industries, products and countries considered amenable to slavery-sustaining practices. Published indices, such as the Global Slavery Index and the Corruption Perceptions Index, were used along with the High-Risk Countries and Sanctions Compliance Policy for this exercise. The risk assessment concluded that the majority of services supplied to WSP Australia were provided by Australian companies and would consequently be considered low-risk services. The modern slavery risk areas for WSP Australia were identified as: facilities, cleaning, couriers, catering, drilling, vehicle repair, earthworks, backhoe/excavation and building maintenance. These services form the minority of the WSP Australia's supply chain.

WSP Australia's risk assessment of its supply chain revealed that 12 of its suppliers (representing less than 1% of its suppliers) are entities located in countries considered to have a high risk of modern slavery. These suppliers provide services considered to be low-risk for modern slavery, such as engineering, consulting, legal, and other professional sub-consultancy services.

The regional Ethics and Integrity team conducted virtual audits in 2026 of these 12 suppliers based in high-risk countries providing low-risk services. These 12 suppliers have completed our modern-slavery questionnaire providing acceptable responses on how they manage risks related to modern slavery within their business. They have also acknowledged our modern slavery requirements and have agreed to our Business Partner Code of Conduct as part of our onboarding process.

For its own operations, WSP Australia maintains HR-led recruitment and employment processes, designed to ensure fair, lawful and voluntary hiring. Employees are paid at or above modern award minimums, recruitment screening includes verification of legal working age and right to work, and employment contracts are issued in English and signed before onboarding. WSP Australia regularly monitors and evaluates market conditions to uphold fair wage practices and comply with local laws, flexible working arrangements and a right-to-disconnect policy to support employee well-being.

### UK Risk Assessment

WSP UK considers the risk of modern slavery in its supply chain when onboarding third parties and when choosing new projects in high-risk countries. Thus, the evaluation of its exposure to such conduct is embedded in routine workstreams. In addition, in response to growing client demand from UK public sector clients, WSP UK conducted the UK Government Modern Slavery Assessment process in January 2025 and plans to continue annually. In alignment with the relevant UK



Government recommendations regarding training for the supply chain, WSP UK has begun to deliver ethics trainings on a targeted basis, as appropriate, and is working with several other WSP regions to provide training to consultants in high-risk countries.

WSP UK's risk assessment of its supply chain revealed that 51 of its suppliers (representing fewer than 1.5% of UK suppliers) are entities located in countries considered to have a high risk of modern slavery. These suppliers provide services considered to be low risk for modern slavery, such as engineering, consulting, legal, and other professional sub-consultancy services including from institutes and universities. They are screened as part of the supplier onboarding and due diligence processes, including adherence to the Business Partner Code of Conduct. WSP UK did not identify instances of forced or child labour in its annual risk review or in any intake received during the reporting period through reporting channels.

For its own operations, WSP UK has a human resources function which establishes and maintains the processes by which WSP UK staff and agency workers are employed fairly, freely and lawfully. Employees are advised during the hiring and onboarding process of their working conditions, rights and benefits, through communications and policies including an employee handbook. Acknowledging that the hiring and supervision of contingent workforce may pose risks, WSP UK has built a relationship with a reputable labour broker to manage this activity, whose selection and ongoing performance evaluation is based on criteria including compliance with the UK Act.

## Norway Risk Assessment

WSP Norway carries out ongoing assessments of risk of negative consequences for basic human rights and decent working conditions linked to its activities and business relationships and continuously monitors any related violations. For WSP Norway's own operations, the assessment is based on regularly conducted employee surveys that cover all employees within the organization, as well as review of reports through its health and safety reporting tool. WSP Norway maintains fair, lawful and voluntary hiring processes through dedicated HR oversight of its recruitment, including verification of legal working age and right to work as well as review of compensation and employment conditions. Employment contracts are issued before employment begins, and all new hires receive structured onboarding. Agency workers, when engaged, are contracted only through reputable agencies operating in compliance with Norwegian labour law.

The employee survey includes a separate module addressing equality and discrimination. The insights gathered from these surveys, in combination with regular monitoring and follow-up of our employees' working hours and workloads, allows WSP Norway to understand the experience and perspectives of its employees, identify areas for improvement, and develop concrete action plans and initiatives. During the reporting period, WSP Norway has not identified any actual adverse impact on human rights and decent working conditions within its own operations. WSP Norway does recognize, however, that there are inherent risks in its business, including but not limited to adverse impacts on working conditions for its employees, notably related to stress, excessive working hours and different forms of discrimination.

For WSP Norway's supply chain, these due diligence assessments involve mapping the company's supply chain and business partners in relation to their activities (industry, products, services, geographical markets, production process and previously identified risks) and considering if any measures should be taken to investigate potential negative consequences for basic human rights and decent working conditions. WSP Norway is committed to implementing measures where the degree of severity and probability of damage is greatest and where WSP Norway has the greatest influence for positive change. The assessment considers WSP Norway's connection to and responsibility for the risk, and the size, nature and context of the business and is in compliance with the Norwegian Transparency Act.

WSP Norway's 2025 risk assessment did not identify any actual human rights violations in WSP Norway's supply chain or with any sub-consultants.

## 7. TRAINING & ENGAGEMENT

WSP trains all its permanent employees on their responsibilities under the Code of Conduct through mandatory onboarding and annual refresher training. In 2025, WSP updated its Code of Conduct trainings, which included a "Human Rights in Action" segment explaining how the Human Rights Policy is implemented in practice, with specific reference to the prohibition of engaging in or ignoring all forms of modern slavery, and a matching exercise linking prevention actions to real-world impacts.



WSP also has an annual training on Health, Safety, Security Environment and Quality (HSSEQ) fundamentals, roles, responsibilities and expectations for employees, in the form of a mandatory e-learning module. The module informs employees of their rights to a safe work environment, to refuse or to stop unsafe work, to wear appropriate personal protective equipment and to report unsafe working conditions without fear of retaliation.

In some WSP subregions and in certain sectors where modern slavery risk is potentially higher, targeted training and awareness activities are conducted. For example, WSP in the United States provides anti-human-trafficking training to employees whose work includes higher-risk locations and contracts.

In 2024, WSP completed the six-month UN Global Compact Canada Business & Human Rights Accelerator program. The program's objective is to help businesses advance their human rights due diligence process.

## 8. REPORTING AND REMEDIATION

Remediation efforts rely on the awareness of the company's reporting channels and confidence in WSP's investigation response. As noted in the "Policies" section above, WSP has a global Reporting, Investigations, and Anti-Retaliation Policy to communicate its commitment to fair and effective investigations.

WSP encourages its employees (via its Code of Conduct and regular ad hoc communications) and members of its supply chain (via its Business Partner Code of Conduct) to report any actual or suspected breaches of ethical conduct, including modern slavery or other violations of human rights, in a timely manner. WSP employees can report suspected misconduct to their manager, their regional Ethics and Integrity representative or WSP's Ethics Office at [ethics@wsp.com](mailto:ethics@wsp.com). Additionally, suspected misconduct can be reported through WSP's Business Conduct Hotline at [wsp.ethicspoint.com](http://wsp.ethicspoint.com), advertised on its public company website and its internal company Ethics' page, available worldwide and 24 hours a day, which can be used by employees, business partners, clients and members of the public to report modern slavery concerns.

If WSP identifies modern slavery incidents in its operations or in its supply chain, its response will be practical and proportionate and also consider the human rights impacts of any remediation on those affected, such as loss of employment or income.

No instances of forced labour or child labour have been identified in the risk assessments carried out in WSP Australia, WSP UK and WSP Norway's supply chain during the reporting period, nor were any reported to the Business Conduct Hotline applicable to those entities. No corrective actions were needed during the reporting period to remediate forced labour or child labour or loss of income in the activities of the reporting entities and their supply chains.

## 9. CONSULTATION

Members of the contributing functions, and the senior leadership of WSP Global, WSP Australia, WSP UK, WSP Norway and relevant subsidiaries have been engaged and consulted in the development of WSP's global approach to assessing and managing modern slavery risks in its operations and supply chain. WSP is committed to regularly reviewing its internal procedures and practices to reduce the risk of modern slavery in its operations and supply chain. WSP is committed to contributing positively to the communities in which it works, setting high standards, and promoting an ethical way of working.

## 10. EFFECTIVENESS

WSP undertakes the following activities to assess the effectiveness of the actions taken to control modern slavery risks within its operations and supply chain:

- Creating new content for the Code of Conduct onboarding and refresher training to ensure it is current and relevant.
- Tracking the completion rate of the mandatory Code of Conduct training globally as a Key Risk Indicator ("KRI"). WSP reports its completion rate per region quarterly to the Board of Directors of WSP Global.
- Tracking the number of its suppliers that have formally agreed to its Business Partner Code of Conduct or equivalent standards.
- Reviewing the High-Risk Countries criteria periodically to align with external indices and reassess exposure to



human rights and modern slavery risks.

- Gathering feedback through its global employee engagement platform, WSP Listens, as an input to understand its global workforce, measure employee engagement through workplace satisfaction scores, retention likelihood and recommendations for WSP.
- Enhancing supplier due diligence by integrating an additional human-rights-focused data source into its vetting platform screening tool to systematically assess and monitor suppliers for potential human rights and modern slavery risks.
- Reviewing available industry reports and survey results to improve the data underlying its approach.
- Reviewing its related global policies annually to ensure they align with regulatory requirements and company expectations.
- Learning from experience and feedback during its due diligence processes to improve the processes and results in the future.
- Periodically evaluating the effectiveness of modern slavery prevention activities.

WSP entities which are subject to subregional/country modern slavery disclosure requirements must monitor and annually review compliance with the regulation and report the results internally to the subregional/country leadership team. Additionally, some subregions/countries implement further effectiveness measures.

- **Australia:** WSP Australia reports training completion rates with respect to the Code of Conduct (including modern slavery) as a KRI to WSP Australia's board of directors, in addition to the local leadership team. Additionally, their regional Ethics and Integrity team continues to conduct regular internal reviews of their due diligence and procurement processes, reinforcing the integrity of their supply chain against risks associated with modern slavery.
- **UK:** WSP UK monitors its high-risk work locations and its intakes to the business conduct helpline as indicators of exposure to modern slavery situations. WSP UK now annually takes the UK government's modern slavery risk assessment at the request of certain clients. The key recommendation of further cascading training to the supply chain has begun in the form of ethics trainings to certain suppliers, on a targeted basis, as appropriate, and will continue as a multi-regional activity, with a priority on those providing consultant services in high-risk countries.
- **Norway:** WSP Norway monitors and carries out regular assessments of the implementation and effectiveness of its internal obligations, activities and targets for due diligence, communicating the results at relevant levels. WSP Norway also seeks regular feedback from its suppliers and its representatives and trade unions to confirm that risk-reducing measures are followed and that, where applicable, damage has been prevented or reduced.

## 11. APPROVAL

This report has been approved by the Board of Directors of WSP Global for the financial year ended December 31, 2025. It has also been approved by the boards of directors of WSP Australia, WSP UK and WSP Norway with respect to the information pertaining to Australia, the UK and Norway, respectively.

Alexandre L'Heureux  
President, Chief Executive Officer and Director of WSP Global  
May 13, 2026



## **Ricardo Limited**

WSP completed its acquisition of Ricardo plc (now Ricardo Limited (“Ricardo”)) on October 9, 2025, during the reporting period covered by this report. Ricardo is a global strategic and engineering consultancy firm headquartered in the UK, operating in over 20 countries, with approximately 2,600 professionals.

Ricardo primarily operates in countries where the risk of modern slavery is considered low, and where engagement occurs in higher-risk countries, it is mainly through skilled individual professionals, either Ricardo employees or vetted contractors. The majority of procurement is undertaken in countries deemed lower risk and is subject to risk-based due diligence.

Given that the acquisition of Ricardo occurred late in the reporting period, integration is at an early stage and remains ongoing. During the next reporting cycle, WSP intends to further integrate Ricardo into its procurement, supplier due diligence and risk assessment processes, including alignment with WSP policies, expanded supplier risk screening and enhanced data collection to support future disclosures.

Other than the number of employees and offices in this report and unless otherwise indicated, the information contained in this report does not include former Ricardo entities. Ricardo’s modern slavery report prepared pursuant to the UK Act for its financial year ended June 30, 2025 has been published by Ricardo.



## Forward-Looking Statements

In addition to disclosure of historical information, the Corporation may make or provide statements or information in this report that are not based on historical or current facts, and which are considered to be forward-looking information or forward-looking statements (collectively, “forward-looking statements”) under Canadian securities laws. These forward-looking statements relate to future events or future performance and may include estimates, plans, strategic ambitions, objectives, expectations, opinions, forecasts, projections, guidance, outlook or other statements that are not statements of fact, including in particular, the effectiveness of our actions to control modern slavery risks within our operations and supply chain and our modern slavery objectives which include, without limitation, governance objectives, objectives in respect of our internal evaluation and management of modern slavery risks, and modern slavery reporting and disclosure objectives, including with respect to the integration of Ricardo.

Forward-looking statements can typically be identified by terminology such as “may”, “will”, “should”, “expect”, “plan”, “anticipate”, “believe”, “estimate”, “predict”, “forecast”, “project”, “intend”, “target”, “potential”, “continue” or the negative of these terms or terminology of a similar nature. Forward-looking statements, by their very nature, are subject to inherent risks and uncertainties and are based on several assumptions, both general and specific, which give rise to the possibility that actual results or events could differ materially from our expectations expressed in, or implied by, such forward-looking statements and that our business outlook, objectives, plans and strategic priorities may not be achieved. These statements are not guarantees of future performance or events, and we caution you against relying on any of these forward-looking statements.

Forward-looking statements made by the Corporation are based on a number of operational and other assumptions believed by the Corporation to be reasonable as at the date such statements were made, including assumptions set out through this report and including, without limitation, the following principal assumptions about: sufficiency of internal and external resources; our ability to maintain effective modern slavery risk management systems and processes; the continuation of supportive stakeholder engagement and collaboration; continued effective management of modern slavery risks and other assumptions described in the “Forward-Looking Statements” section of our most recent Global Sustainability Report, which section is incorporated herein by reference into this cautionary statement and which document is available on our website at [www.wsp.com](http://www.wsp.com). If any of these assumptions prove to be inaccurate, the Corporation’s actual results or events could differ materially from those expressed or implied in forward-looking statements.

In evaluating these forward-looking statements, readers should specifically consider various risk factors, which, if realized, could cause the Corporation’s actual results or events to differ materially from those expressed or implied in forward-looking statements. Such risk factors include, but are not limited to, the failure to implement sufficient corporate and business initiatives; difficulty in accurately measuring, evaluating and disclosing our modern slavery risk management performance; our inability to collect modern slavery risk data from suppliers or the suppliers of acquired companies, including for historical years, as well as other risks detailed from time to time in reports filed by the Corporation with securities regulators or securities commissions or other documents that the Corporation makes public, which may cause actual results or events to differ materially from the results expressed or implied in any forward-looking statement.

These risk factors and other risk factors that could cause actual results or events to differ materially from our expectations expressed in, or implied by, our forward-looking statements are discussed in greater detail in section 20, “Risk Factors” of the Corporation’s management’s discussion and analysis for the fourth quarter and year ended on December 31, 2025, which is available on WSP’s website at [www.wsp.com](http://www.wsp.com) and on SEDAR+ at [www.sedarplus.ca](http://www.sedarplus.ca) and which section is incorporated herein by reference into this cautionary statement.

The forward-looking statements contained in this report describe the Corporation’s expectations as of the date of this report and, accordingly, are subject to change after such date. Except as may be required under Canadian securities laws, the Corporation does not assume any obligation to publicly update or to revise any forward-looking statements made in this report or otherwise, whether as a result of new information, future events or otherwise. The forward-looking statements contained in this report are expressly qualified in their entirety by this cautionary statement. Readers should not place undue reliance on forward-looking statements.



ADDENDUM  
TO THE  
2025 MODERN SLAVERY REPORT

The Board of Directors of WSP Global Inc. have reviewed and acknowledged the 2025 Global Modern Slavery Statement which includes reporting details relevant to the risks of modern slavery, including forced labour and child labour, in its operations and supply chains, as required by the laws of Australia, the United Kingdom and Norway for the reporting period from January 1, 2025 to December 31, 2025.

The 2025 Modern Slavery Statement has been reviewed, approved and endorsed by the Board of Directors of WSP UK Limited, for the information contained within the 2025 Modern Slavery Statement pertinent to WSP UK Limited, on 24 March 2026, and signed by Paul Reilly, President & Managing Director, WSP UK & Ireland.

A handwritten signature in black ink, appearing to read 'Paul Reilly', with a long horizontal line extending to the right.

Paul Reilly  
President and Managing Director WSP UK and Ireland  
WSP UK Limited  
13 May 2026