

---

# Human Trafficking and Modern Slavery Policy

## Policy

Trafficking in persons and slavery for the purposes of exploitation is a serious crime and a gross violation of human rights.

Stantec conducts its business in such a manner so as to support and implement a zero tolerance policy regarding trafficking in persons and modern slavery. Stantec does not permit human trafficking and modern slavery in our business activities, our supply chains, nor tolerate it on any project. This Policy stands alongside Stantec's broader commitment to human rights as outlined in our Human Rights Policy.

## Practice

At a minimum, Stantec and its employees shall not (1) engage in any form of forced, trafficked and child labor ("**Trafficking in Persons**"); (2) procure Commercial Sex Acts; or (3) engage in any act of Modern Slavery.

If an employee violates this Policy, they will be subject to appropriate discipline, including but not limited to removal from the project, reduction in benefits, or termination of employment with or without cause.

Any suspected violation of this Policy by a Stantec employee or subcontractor acting on behalf of Stantec, can be reported to Stantec's **Integrity Hotline**. Stantec's Integrity Hotline is managed by an independent third party who can receive complaints in a variety of languages. The hotline is structured to receive information verbally, by a web interface, or in writing, and all reports are treated as confidential. Requests for anonymity will be honored to the extent possible while still ensuring a full and proper investigation. It is important that anonymous reports contain sufficient detail for an investigation. Stantec employees can also report suspected violations of this Policy to their line managers or to HR if they prefer.

Additional information on this topic is available at the following website:

<https://www.dhs.gov/blue-campaign/videos/general-awareness>

The following words, phrases, or terms shall have the indicated meanings when used in this Policy:

- "Stantec" means Stantec Inc. or any of its subsidiaries.
- "Commercial Sex Act" means any sex act on account of which anything of value is given to or received by any person.
- "Involuntary servitude" means a condition of servitude induced by (a) any means intended to cause a person to believe that they or another person would suffer serious harm or physical restraint if they refused to comply; or (b) the abuse or threatened abuse of the legal process.

- “Modern Slavery” means (a) holding a person in slavery or involuntary servitude, or (b) requiring a person to perform forced or compulsory labor.
- “Sex trafficking” means the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act.
- “Trafficking in Persons” means (a) sex trafficking in which a commercial sex act is induced by force, fraud or coercion, or in which the person induced to perform such act is under 18 years of age; (b) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery; (c) disallowing the possession or control of an individual’s personal identification documents as a means to control them; (d) charging employees recruitment fees.