

# **Management Approach: Human Rights**

Stantec believes in the need to consciously work to protect and advocate for the rights of others—in the office, with our partners, on our projects, and in our communities.

#### **Commitments and Practices**

As a signatory to the UN Global Compact, we commit to its human rights and labor principles. Stantec's <u>Human Rights</u> and <u>Human Trafficking & Modern Slavery</u> policies are based on well-recognized international principles and outline our commitment to and methodology for protecting human rights.

Our human rights approach is based on treating people fairly and includes respecting individual rights, compensating fairly, protecting privacy, promoting health and safety, not tolerating discrimination or harassment, and prohibiting forced and child labor. We apply this mindset to our full value chain but focus on the issues and relationships on which we have greater degrees of control and influence to create the greatest impact.

Stantec has successfully completed the UN Global Compact Human Rights in Business Accelerator Program. Guided by the key concepts of the UN Guiding Principles on Business and Human Rights, we have initiated a Human Rights Due Diligence (HRDD) action plan.

Stantec complies with the requirements of laws such as the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada), the Modern Slavery Act 2015 (United Kingdom), and the Modern Slavery Act 2018 (Australia).

#### **In Our Operations**

Stantec's efforts to protect human rights in our direct operations are reflected in our efforts to compensate fairly, close pay gaps, provide an inclusive workspace, protect the health and safety of our employees, support Indigenous communities, and lead climate action, among others.

For our operations, we believe it is important to explicitly identify human rights as a part of our policies, procedures, and ethics training to help us keep the topic top-of-mind and reduce the likelihood of issues in the future. Stantec trains all employees annually on ethics, and the training includes content on human rights protections. If employees notice a concern, we encourage them to speak up.

Stantec respects the rights of our employees to freedom of association, union organizing, and collective bargaining. To support our employees in the expression of their unique selves, Stantec strongly encourages employees to join or form an Employee Resource Group, open to all employees, that supports diversity in gender, race, ethnicity, visible or non-visible disabilities, neurodiversity, veteran status, sexual orientation, or gender identity.

## **Supporting Clients**

As a consulting firm, Stantec provides design services for projects that are constructed by others. While Stantec may not produce goods or perform construction<sup>1</sup>, we recognize our work influences the outcomes of built and natural infrastructure. In our project work, Stantec has subject matter experts throughout the business (in all operating units and geographies) available to help clients address human rights and social equity as part of a project. From a general best practices standpoint, we have more than 300 worldwide members of Stantec's Socio-Economic Equity Network (SEEN) who collaborate to promote a social equity mindset in all that we do.

Stantec primarily provides design services. Our limited connection to construction services includes ecosystem restoration, construction management, and inspection services. The only physical product we produce are plants and seeds in our native plant nursery, which represents less than 1% of our global revenue.

When deciding on whether to pursue new projects, Stantec factors human rights considerations into our go or no-go evaluation process. While not every project is closely assessed, where the risk of a negative impact on human rights is identified during our project risk review, we put protection conditions in place or choose not to work on the associated project. While working on a project, if employees notice a concern, we encourage them to speak up.

#### With Our Supply Chain

Stantec's human rights policy includes the request for our subconsultants, suppliers, and business partners to adhere to human rights principles consistent with our own. Our Partner Code of Business Conduct shares these expectations.

As part of our HRDD action plan, we have begun to assess our supply chain human rights risks. Given the nature of our service-based work, the decentralized nature of our procurement processes, and the wide variety of industries served, this is a difficult task that requires organizational change to address. By using a risk-based approach in our review, we are considering the following factors: the nature and location of our operations, the sectors and countries where we provide services, the type and complexity of our supply chain, and the level of control and influence we have over our suppliers. We apply our risk management processes to identify, assess, and evaluate the risks, including risks related to modern slavery, human trafficking, and other human rights related risks.

Stantec developed anti-forced labor and child labor contractual clauses for certain suppliers and business partners which require compliance with all applicable laws and regulations and respect internationally recognized labor standards.

### **Accountability**

Stantec encourages anyone (including employees, suppliers, partners, subcontractors, subconsultants, clients, and community members) to speak up if they become aware of a human rights concern. This includes concerns about Stantec's operations, supply chain, and client-led interactions.

Internally, issues can be reported to our risk management team via <u>integrity@stantec.com</u> or anyone can report confidentially and anonymously using our Company's Integrity Hotline via <u>www.stantec.ethicspoint.com</u> or a variety of toll-free numbers (managed by a third party and available in local languages).

Stantec will take reasonable and practicable steps to identify any breaches of our human rights-related policies and will act accordingly to constantly improve for the communities in which we work. We commit to promptly investigate any reports and addressing any violations of these policies. Retaliation for any reports made in good faith is prohibited.

Material Topic / Value Chain Nodes Covered:

Human Rights / Operations, Downstream (Clients), Upstream (Supply Chain)

See all Stantec Management Approaches