

# Modern Slavery Act 2015 Statement

## INTRODUCTION

WSP has a zero tolerance policy in relation to slavery and human trafficking and is committed to acting ethically and with integrity in all our business dealings and relationships. We welcome the opportunity presented by the Modern Slavery Act 2015 to conduct a thorough review of our business and supply chain to ensure we are contributing to efforts to combat modern slavery and human trafficking and living up to our own standards of ethical behaviour.

## WSP - BUSINESS STRUCTURE

WSP is a global business with approximately 43,000 employees based in more than 500 offices across 40 countries worldwide. All operations, including the UK business, are ultimately owned by WSP Global Inc. a company listed on the Toronto stock exchange. WSP provides services to transform the built environment and restore the natural environment. Our expertise ranges from environmental remediation to urban planning, from engineering iconic buildings to designing sustainable transport networks, and from developing the energy sources of the future to enabling innovative new ways of extracting essential resources.

The following WSP group companies operating in the UK had a turnover in excess of £36 million (as of 31 December 2017):

- WSP UK Limited
- WSP Management Services Limited

This statement is made on behalf of the companies listed above but also on behalf of all subsidiaries of WSP UK Limited operating in the UK.

## OUR POLICY

The WSP UK policy dealing with anti-slavery and human trafficking can be found on our [UK website](#). Our supply chain includes sub-consultants, sub-contractors, general business suppliers, travel agencies and professional services providers; it also includes other businesses within the global WSP business. The WSP UK Policy reflects our core values, our ethical principles and our commitment to human rights. In particular, they specify standards we expect WSP suppliers to adhere to, including in relation to slavery and human trafficking. Also, our Third Party Code of Conduct on [our global website](#) explains for the benefit of all of our suppliers and our employees our expectations as regards ethical behaviour.

We maintain an independent whistleblowing hotline administered by EXPOLINK, an independent third party, and have published the details of that hotline to our employees to ensure employees have the ability to raise an issue confidentially.

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## ENHANCEMENTS TO OUR PROCESSES

As part of our efforts to place WSP at the leading edge of compliance with the Modern Slavery Act 2015 and to respond to the demands of our clients in this regard:

1. We conducted a human trafficking and modern slavery risk assessment to inform our proportionate response to the legislation
2. We have prepared a specific policy relating to the Modern Slavery Act 2015 and published this on [our website](#)
3. During 2018 we have implemented an updated internal training programme on the subject of ethical business practices at a Global business level
4. We have enhanced our procedures for on-boarding new suppliers to obtain confirmation of a supplier's awareness of and compliance with the Modern Slavery Act 2015. WSP suppliers must now provide more detailed information about their policies, processes and risk assessments, including the prevention of slavery and human trafficking within their own organisation and supply chains. We continue to monitor and assess all responses from potential new WSP suppliers
5. We continue to embed this culture into our existing supply chain, applying a proportionate and risk based approach to obtaining confirmation from existing suppliers of their awareness of and compliance with the requirements of the Modern Slavery Act 2015, with an escalated procedure for medium and high risk suppliers on the basis of sector or geographical location of their operations
6. We have enhanced our procedures for assessing suppliers for one-off payments
7. We have established a cross-function core team dealing with Modern Slavery Act 2015 compliance and queries and that team shares knowledge, undertakes training and arranges communications on this subject with the wider UK business (as applicable, taking a risk based approach)
8. We are reviewing our suite of contractual documents with suppliers and, where relevant and appropriate, we are introducing contractual provisions to ensure compliance with the Modern Slavery Act 2015
8. We are working with recently acquired businesses (including Opus) to ensure that our policies and procedures are adopted and integrated into acquired businesses as soon as possible
9. During 2019, our internal audit function will be tasked to conduct a sample audit of our suppliers as regards their adherence to our Modern Slavery Act 2015 policies and contractual obligations. Outcomes of this audit will inform our ongoing work in this area.

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10. We have worked extensively with our clients as members of their supply chain to agree terms to embed a culture of compliance with the Modern Slavery Act.

## CONTINUING TO IMPROVE

As our approach (and the approach of our clients) to combatting modern slavery and human trafficking continues to develop and mature, we will be looking for appropriate key performance indicators to allow us to assess our performance in this area.

Compliance with the Modern Slavery Act 2015 is monitored by a combination of Viv Jones (Head of Risk and Ethics – UK and Africa), Charlotte Woodworth (Procurement Director) and Karen Sewell (EMEIA General Counsel and Head of UK Legal).

## 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 2018 at a meeting held at WSP House, 70 Chancery Lane, London WC2A 1AF on 18 December 2018.

Mark Naysmith

Director and UK Chief Executive Officer



WSP UK Limited

18 December 2018