

# Slavery and Human Trafficking Policy



As one of the world's leading engineering and professional services consulting firms, WSP is committed to maintaining the highest standards of ethics and integrity throughout its business practices and relationships.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking in order to exploit them for personal or commercial gain. WSP has a zero tolerance policy in relation to any form of slavery or human trafficking, and WSP fully embraces the key principles of the Modern Slavery Act 2015.

WSP is committed to doing its utmost to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business, or within our supply chains.

Our relationships with our Sub-consultants, Sub-Contractors, vendors, suppliers and their employees, business partners, agents and others working on their behalf (collectively, "**Third Parties**") are an integral part of our business.

This Policy sets our values as they apply to Third Parties for ethical behaviour when interacting with WSP, or when acting on its behalf WSP expects Third Parties to conduct their business lawfully in full compliance with the Modern Slavery Act 2015 and in accordance with the principles set out not only within our Third Party Code of Conduct (the "**Code**"), but also this Modern Slavery Act 2015 policy (the "**Policy**") and in particular:

- 1) Employees of Third Parties ("Workers") must be working voluntarily. Workers shall not be subject to forced, prison, bonded, indentured, slave, trafficked or compulsory labour in any form, including forced overtime and their broader human rights shall also be respected.
- 2) Workers must have the right to terminate their employment freely, as appropriate following a reasonable period of notice (contractual or otherwise) in accordance with applicable laws and collective agreements and without the imposition of any improper penalties.
- 3) Workers shall not be mentally or physically coerced to provide their labour.
- 4) Workers shall not have their identity or travel permits, passports, or other official documents or any other valuable items confiscated or withheld as a condition of employment and the withholding of property shall not be used directly or indirectly to restrict Workers' freedoms or to create workplace slavery.
- 5) Fees or costs associated with the recruitment of Workers (including but not limited to fees related to work visas, travel costs and document processing costs) shall not be charged to Workers whether directly or indirectly. Similarly, Workers shall not be required to make payments which have the intent or effect of creating workplace slavery, including security payments, or be required to repay debt through work.
- 6) Workers shall have their terms of employment or engagement set out in a written document that is easily understandable to them and which clearly sets out their rights and obligations. This written document shall include, but not be limited to, transparent terms with respect to wages, overtime pay, payment periods, working hours and rights in respect of rest breaks and holiday.
- 7) Such written terms shall be provided to the worker in advance of them starting work, shall be honoured by the employer and shall meet industry standards and the minimum requirements of applicable laws and collective agreements where the work is carried out.
- 8) Wages should be paid regularly and directly to Workers and in legal tender. Methods of payment that have the effect of depriving the Worker of the ability to terminate employment are prohibited.
- 9) There shall be no use of child labour. Nobody shall be employed under the minimum age. Subject to the overriding prohibition on the use of child labour, if Workers under the age of 18 are employed (including under apprenticeship training programmes) then particular care shall be taken as to the duties that they carry out and the conditions in which they are required to work to ensure that they come to no physical, mental or other harm as a direct or indirect result of their work or working conditions.
- 10) Workers, their families and those closely associated with them shall not be subject to harsh or inhumane treatment including but not limited to physical punishment, physical, psychological or sexual violence or coercion, verbal abuse, harassment or intimidation. Migrant Workers, their families and those closely associated with them should not be subject to discrimination due to their nationality.
- 11) Workers shall be free to file grievances to their employers about the employer's treatment of them and Workers shall not suffer detriment, retaliation, or victimisation for having raised a grievance.
- 12) Workers shall be free to move without unreasonable restrictions and shall not be physically confined to the place of work or other employer controlled locations (for example accommodation blocks) nor shall they be confined by more indirect means. There shall be no requirement placed on Workers that they take accommodation in employer controlled premises except where this is necessary due to the location or nature of the work being performed.

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- 13) Where it is necessary to recruit Workers who are engaged via a third party, such as an employment agency, then only reputable employment agencies shall be engaged. Where Workers are sourced to be employed directly, only reputable recruitment agencies shall be engaged. All such agencies must have the necessary licences and registrations under local laws; agree to adhere to this Policy; and agree to be audited to ensure their compliance with this Policy.
- 14) Workers' broader human rights shall also be respected (as outlined in the European Convention on Human Rights).

Our suppliers, Contractors and business partners are required to adhere to the principles in this Policy, to provide responses to questions that we may ask related to their compliance with this Policy and to engage with audits which we may choose to undertake. Similarly we expect them to require the same standards, conduct and co-operation of their own Sub-Contractors, suppliers and business partners.

All policies are available upon request or accessible through our website at <http://www.wsp-pb.com/en/Who-we-are/Corporate-Governance/Corporate-Policies/Code-of-Conduct-and-Policies/>.

## Reporting Violations

Third Parties should report, and act to correct, any suspected violations of the Modern Slavery Act 2015. Violations must be reported in a timely manner to the WSP contact person. Suspicions may also be reported confidentially and without fear of retaliation using our whistleblowing services, Expolink <mailto:wsp@expolink.co.uk>

## Application and Compliance

This Policy is not intended to replace any Third Parties' existing policies or those of their subsidiary businesses, but to act as an additional set of governing principles. Third Parties should encourage their employees and agents to follow this Policy. WSP has the right to investigate any reasonably suspected breach of this Policy and reserves the right to terminate its business relationship with any Third Party who has violated the principles set out above.

The principles herein are not exhaustive. The fact that a topic is not specifically addressed does not relieve Third Parties of their obligation to maintain the highest ethical standards under any and all circumstances.

We will review and update this policy on an annual basis, or more frequently if necessary.

A handwritten signature in black ink that reads "Karen Sewell".

Karen Sewell  
EMEIA General Counsel and Head of UK Legal

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Review Date                      *December 2018*