

# Modern Slavery Act Statement

## INTRODUCTION

Around 40 million people worldwide are victims of slavery<sup>i</sup> in its various modern forms.<sup>ii</sup> Consistent with the UN's position, WSP recognises the critical role of private sector in ending slavery,<sup>iii</sup> and the obligations imposed by the Modern Slavery Act 2015 in the UK and similar legislation elsewhere. WSP is therefore proud to publish details of the steps it has taken in 2019 to ensure that slavery is not taking place in its business and in its supply chains.<sup>iv</sup>

## WSP'S STRUCTURE, OPERATIONS AND BUSINESS MODEL IN THE UK

WSP is a global business with more than 40,000 employees in 40+ countries. The worldwide business is ultimately owned by WSP Global Inc., a Canadian company listed on the Toronto Stock Exchange.<sup>v</sup> WSP's principal subsidiary in the UK is WSP UK Limited, which operates both nationally and globally.

WSP develops creative, comprehensive and sustainable engineering solutions for a future where society can thrive. Our work includes engineering iconic buildings, designing sustainable transport systems, developing clean energy, restoring the environment, and much more. WSP's principal clients are public bodies, private companies and financial institutions.

As a highly specialist professional services company, WSP's primary inputs in the UK are its highly-skilled staff, the complex IT equipment and systems that its staff uses, the offices at which its staff work, and various ancillary travel and professional services. The suppliers of the UK businesses are located around the world and are principally other entities controlled by WSP, other professional services companies, IT providers, landlords and a variety of service providers.

## PRACTICAL STEPS TAKEN AGAINST SLAVERY

The scope and nature of WSP's business model, activity and footprint means that WSP's business and supply chain is less amenable to slavery-sustaining practices than those many other companies even within the built environment sector. Nonetheless, WSP continues to take practical and proportionate steps to ensure that slavery does not take place in WSP's business and supply chain. Notwithstanding the disruptive effect of COVID-19 across 2020, these steps have consisted *inter alia* of:

- **Proportionate Procedures:** WSP in the UK has maintained proportionate procedures to identify and exclude slavery from its business and supply chain. (A number of those procedures are described below). The task of establishing and reviewing the effectiveness of those procedures has been consolidated in Ethics & Compliance function, with due support from the Human Resources, Procurement and Health & Safety functions.
- **Top-Level Commitment:** the leadership of WSP in the UK has signalled its commitment to excluding slavery by ensuring that the Ethics & Compliance function is adequately resourced and has autonomous reporting lines to the global board of WSP.
- **Risk Assessment and Due Diligence:** WSP has continued ensure its approach changes as its business has grown and changed. Slavery risk assessment and management is included in corporate transactions and integrations. Further, prospects and projects in geographic markets that present an elevated level of slavery risk are typically subject to an elevated level of scrutiny and approval at a regional and global level. This typically includes a review by the Ethics and Compliance function and additional slavery risk mitigants (where appropriate).

# Modern Slavery Act Statement

- **Client Engagement:** WSP has engaged with major clients (esp. in the government sector) to understand their concerns around modern slavery, ensure that WSP complies with their anti-slavery contractual obligations, and to seek industry-wide solutions to industry-wide problems.
- **Employee Engagement:** More than 95% of employees in the UK have received training on WSP's global *Code of Conduct*.<sup>vi</sup> WSP maintains a comprehensive HR function to ensure that its staff are employed fairly, freely and lawfully.
- **Supply Chain Engagement:** at a global level, WSP maintains a *Third Party Code of Conduct*,<sup>vii</sup> with which suppliers to WSP are expected to comply. In addition, prospective suppliers to WSP are required to disclose the nature and status of their anti-slavery procedures before being onboarded as a supplier by WSP. WSP's General Conditions of Purchase As part of an overarching realignment of its procurement function, WSP is now restructuring its onboarding of suppliers to ensure that *inter alia* its anti-slavery engagement is proportionate, practical and effective.
- **Monitoring and Review:** WSP in the UK has monitored and reviewed the effectiveness of its anti-slavery procedures. In December 2019, its *UK Slavery and Human Trafficking Policy* was restated as its *Slavery Prevention Policy* to ensure that its procedures were practical, proportionate and clear; it was review and updated in December 2020. In addition, WSP has amended its HR, finance and expenses policies to prevent and/or restrict certain activities that bear an elevated risk of slavery.
- **Public Outreach:** WSP has published its *Modern Slavery Act Statement* and its *Slavery Prevention Policy*<sup>viii</sup> on its website at [www.wsp.com](http://www.wsp.com).
- **Identifying and Responding to Concerns:** an independent company operates a Business Conduct Hotline on WSP's behalf. WSP encourages employees, suppliers, clients and the public to report concerns ("blow the whistle") about slavery in WSP's business or its supply chain via the Business Conduct Hotline. The Business Conduct Hotline can be contacted via <https://wsp.ethicspoint.com/>

## CONTINUING TO IMPROVE

WSP anticipates that the practical steps described above will also be taken in 2021. We continue to be informed by the best practice and analysis of our sector, our clients, our suppliers and of anti-slavery practitioners.

WSP welcomes constructive engagement with all stakeholders to increase the effectiveness of its anti-slavery activity. In particular, we expect an increase in engagement with large public authorities in the UK as they start to publish their own slavery and human trafficking statements pursuant to an anticipated amendment to section 54 of the UK's Modern Slavery Act 2015.

More generally, as a UK-based business that operates globally, WSP UK Limited anticipates further engagement with clients, vendors and government agencies in certain international markets that are upgrading and expanding their legislation to combat slavery.

# Modern Slavery Act Statement



## 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 2020 at a meeting held at WSP House, 70 Chancery Lane, London WC2A 1AF on 17 December 2020.

A handwritten signature in black ink, appearing to read 'M. Naysmith'.

Mark Naysmith  
Statutory Director and UK Chief Executive Officer  
WSP UK Limited  
17 December 2020

---

<sup>i</sup> Page 9, *Global estimates of modern slavery: forced labour and forced marriage*, International Labour Organization and Walk Free Foundation, 2017, last accessed online ([link](#)) on 11 Dec 2019.

<sup>ii</sup> For the purposes of WSP's activity to ensure that slavery does not take place within its UK business or supply chain, WSP identifies the principal forms of slavery as forced labour, child labour, sexual exploitation, servitude, forced marriage and the ancillary activity of human trafficking.

<sup>iii</sup> Page 12, *Global estimates of modern slavery: forced labour and forced marriage*, International Labour Organization and Walk Free Foundation, 2017, last accessed online ([link](#)) on 11 Dec 2019.

<sup>iv</sup> This statement is published by WSP UK Limited (a company registered in England & Wales, company number 01383511) on behalf of itself, WSP Management Services Limited (a company registered in England & Wales, company number 02454665), and all subsidiaries of those companies to the extent they are a "commercial organisation" as defined by section 54(2) of the UK's Modern Slavery Act 2015. The financial year of those companies runs from 1 January to 31 December of each year. The publication of this statement discharges the obligations (if any) of those companies under section 54(1) of the Modern Slavery Act 2015.

<sup>v</sup> For detailed information on WSP's workforce, activities and financial performance, see WSP's global website at [www.wsp.com](http://www.wsp.com)

<sup>vi</sup> WSP's global *Code of Conduct* can be found on WSP's website ([link](#)).

<sup>vii</sup> WSP's global *Third Party Code of Conduct* can be found on WSP's website ([link](#)).

<sup>viii</sup> The publicly-accessible version of the *Modern Slavery Prevention Policy* excludes certain confidential, market-sensitive and/or personal information.