

1.1 To whom does this policy apply?

This policy applies to all employees and officers of WSP UK (WSP Staff), wherever they are in the world, at all times.

1.2 What are the main forms of slavery?

At least 40 million people worldwide are victims of slavery. The forms of slavery that are particularly relevant to multinational corporations like WSP are summarised below.¹

Forced Labour	Forced Labour occurs when a person is forced to work against their will, is subject to seriously unfair labour practices, or is trapped by debt bondage. Governments' use of prisoner workers (China, Peru, USA ²) and conscript workers (e.g. Eritrea, North Korea ³) may be Forced Labour, even if it is legal under local law.
Child Labour	Child Labour is employment of children that interferes with their education, development or dignity, or that is unlawful. There are c.150 million child labourers in the world, of whom 73 million are employed in hazardous work. ⁴
Sexual Exploitation	Sexual Exploitation occurs when a person abuses superior power, wealth, influence or trust in relation to sexual activity. It includes non-consensual sexual activity, sexual activity under duress or impaired/mistaken consent, and sexual activity as a condition for assistance or entitlements. ⁵ Vulnerable People (children, patients, detainees, displaced persons etc) are often victims of Sexual Exploitation. Sexual Exploitation is common in the sex industry.
Human Trafficking	Human Trafficking occurs when a person recruits, transports, harbours, receives or "trades" another person for the purpose of exploitation – typically Forced Labour, Child Labour and/or Sexual Exploitation.

Slavery occurs to some degree in almost every sector and country, but is particularly prevalent in certain:

- *Sectors:* agriculture, construction, textiles, informal (a.k.a. artisanal, illegal) mining, light industry (packaging, assembly etc), domestic service, the illicit drugs industry, and the sex industry;
- *Activities:* regardless of the sector, economic activity that relies heavily on unskilled, semi-skilled or migrant labour is particularly vulnerable to slavery and slavery-sustaining practice; and
- *Countries:* developing and transitional countries of the Middle East, Asia, Africa and Latin America.

1.3 How might these risks arise in WSP's business?

Engineering and professional services generally are not regarded as a high risk sector in respect of slavery.⁶ However, WSP does advise clients that operate in elevated risk sectors, and WSP has offices and/or projects in countries that present an elevated level of slavery risk. WSP's principal slavery risks are therefore:

- that WSP's supply chain includes suppliers that engage in slavery-sustaining practices;
- that WSP advises a client whose project, business or supply chain involves or sustains slavery (particularly Forced Labour, Child Labour and Human Trafficking); or
- that individual members of WSP Staff engage in or sustain slavery practices.

¹ Other forms of Modern Slavery, such as Servitude (where a person is traded as if they were property, and forced to work for their "owner") and Forced Marriage (where a person - often a child - is married without genuine or informed consent, and forced to work for their "spouse"), exist but are less likely to affect supply chains of multinational corporations like WSP.

² "Prison labour is a billion-dollar industry, with uncertain returns for inmates", *The Economist*, 16 March 2017, accessible [here](#).

³ "Europe accused of financing Eritrean project based on 'forced labour'", *The Guardian*, 02 April 2019, accessible [here](#).

⁴ *Global Estimates of Child Labour: Results and Trends* at page 5, 2012-2016, International Labour Organization, 2017, accessible [here](#).

⁵ Adapted from *World Health Organisation Sexual Exploitation and Abuse Prevention and Response: Policy and procedures*, March 2017, accessible [here](#).

⁶ In brief, WSP's services are typically human capital-intensive intangible services. Its key clients are public agencies, financial institutions and private corporations. It rarely or never interacts with vulnerable populations (children, patients, detainees, displaced persons etc) in the course of delivering services. Its key vendors are professional services and financial services companies with a similar profile, and providers of travel, office space, and IT services.

1.4 How will WSP manage these risks?

WSP absolutely prohibits slavery in relation to its business. It also prohibits WSP Staff from engaging in, suggesting, allowing, ignoring or being indifferent to slavery in relation to its business.

WSP will progressively take the following practical steps to identify and exclude slavery from its business:

- Prospects in relation to projects in or clients from high modern slavery risk countries will be the subject of an elevated level of scrutiny, and additional practical risk mitigants (including targeted training and briefing on Modern Slavery issues) may be applied to those prospects.
- WSP will not employ anyone under the age of 18 **unless** a written waiver has been issued by the Head of Human Resources in the respective country.⁷
- WSP will apply its Safeguarding approach to projects and activities that involve contact with vulnerable persons, and therefore an elevated risk of Sexual Exploitation.⁸
- WSP Staff must not purchase or consume services from the illicit drugs industry or sex industry (inc. lap dancing and strip bars) in the course of work-related activities.⁹
- WSP will oblige its vendors to take reasonable steps to exclude slavery from their business and supply chain; to ensure that children under 16 are not employed by vendors on WSP-related projects (unless a written waiver has been issued by the UK Head of Procurement); and to comply with Ethics & Compliance terms that address slavery and the Third Party Code of Conduct generally.
- WSP (UK) Ltd (on behalf of itself and relevant affiliates) will publish an annual statement on the steps it has taken during the previous financial year to ensure that slavery is not taking place in its business and its supply chain.¹⁰

More generally, WSP Staff are empowered to seek advice in relation to slavery with an adequately-resourced Ethics & Compliance function. WSP Staff and the wider community are encouraged to escalate ("blow the whistle") concerns about slavery to WSP's Business Conduct Hotline.

1.5 How to get advice on preventing modern slavery

Employees and officers of WSP in the United Kingdom can obtain advice about any of the subjects addressed in this Policy by reading the regional Ethics & Compliance page of the intranet or by contacting:

- Ethics & Compliance Officer, UK & Africa
+44 20 7093 6602
- EMEIA General Counsel & UK Head of Legal
+44 20 3116 9086

1.6 How to raise concerns (blow the whistle) about unethical or noncompliant conduct

Everyone (WSP employees, vendors, clients and members of the community at large) is encouraged to raise concerns about unethical or noncompliant behaviour in WSP's business or its projects. The leadership of WSP can only solve problems if it is aware of them. Raising concerns promptly allows WSP to address problems objectively

⁷ Employment in this context includes internships, apprenticeships, work experience and all other forms of paid and unpaid labour. It is extremely unlikely that WSP will issue a waiver for child labour on tasks that involve heavy machinery, remote or confined worksites, lone work, night work, trackside/highway works or other inherently risky activity.

⁸ WSP's approach to Safeguarding is described in section 6.32 of its Employee Handbook.

⁹ All periods of business travel are work-related activities for the purposes of this Policy, regardless of whether the staff member is working or on duty at any given moment.

¹⁰ Preparation and publication of this statement is required by section 54 of the Modern Slavery Act 2015 (England and Wales).

and minimise their legal, reputational, environmental and financial impact. The Ethics & Compliance function of WSP has the skills and mandate to investigate any breach of this Policy.

You can contact WSP's Business Conduct Hotline on the details below. You do not have to use your real name. You can raise your concern in almost any language. It is helpful if you can provide specific details of your concern, but you do not have to provide any formal evidence and you are not obliged to investigate anything yourself.

Intranet: <http://intranet.wspgroup.com/en-GB/Group-Root/Group/Policies/Whistleblowing-Service/>
Internet: <http://wsp.ethicspoint.com>
Phone: 0808 234 0085 (UK)

Compliance & Ethics Officer, UK & Africa

Issue Date *December 2020*

Review Date *December 2021*