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Managing our ESG Impacts

June 2022

MANAGING OUR ESG IMPACTS

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INTRODUCTION

This document details how WSP identifies, evaluates and manages its most significant environmental, social and governance (ESG) topics and impacts, in accordance with the Global Reporting Initiative (GRI) 2016 Universal Standards. We have mapped 20 ESG topics that are material to WSP across twelve ESG impact areas. The management approach disclosures describe each topic, their conceptual boundaries, related management practices and policies, and the ways we measure and evaluate performance. In some cases, we use the same approach for managing multiple material topics (e.g., water and waste).

ESG GOVERNANCE

At WSP, ESG governance starts at the highest level of the organization. The Governance, Ethics and Compensation Committee (GECC) of WSP Global's Board of Directors is charged with reviewing our ESG policies and practices, monitoring our commitment to ESG and overseeing our strategy and reporting. The Chair of the GECC is responsible for oversight of ESG goals, commitments, risks and opportunities, and serves as the ESG liaison between our senior management and the Board. Our Global ESG Committee oversees ESG strategy and performance, which includes the management approaches for many of our material topics. The committee is comprised of global leaders with topic-specific or regional responsibility. In addition to overseeing specific ESG impacts, the committee looks holistically at our ESG efforts and the interconnection between various topics. For more information about our corporate and ESG governance practices, please see our 2021 Global ESG Report. Global policies and/or guidelines have been established for most of our material topics and are updated on a regular basis.

ESG is a key driver of WSP's 2022-2024 Global Strategic Action Plan. This plan establishes global targets for many of our material ESG topics. These targets are described in our 2021 Global ESG Report along with our key performance indicators (KPIs), progress against our targets and ambitions, and highlights from the past year. In addition, starting in 2022, a portion of the variable compensation of our global leaders will be tied in part to achieving ESG targets across select topics, an industry best practice.

Please see our 2021 Global ESG Report for more information on performance across our ESG topics.

MATERIALITY ASSESSMENT

We periodically conduct a materiality assessment to ensure that we report on what matters most to our stakeholders. Our most recent materiality assessment was conducted in 2018 in accordance with the GRI standards. As part of this assessment, we:

— Benchmarked the topics disclosed by our peers and sustainability leaders in other industries; reviewed feedback on WSP's past reports including key ESG raters' assessments of our disclosure; and validated our initial list of possible topics with company leadership and those involved with our reporting process;

— Reviewed these topics with external and internal stakeholders via questionnaires and interviews to validate our internal perspectives. External stakeholders were comprised of investors and clients, while

internal stakeholders included employees, regional sustainability leaders and corporate function leaders overseeing areas related to our ESG impacts;

— Analyzed stakeholder feedback to determine which topics should be reported;

— Organized the content of our global ESG reports in alignment with the GRI standards; and

— Validated global ESG report content to ensure that it included the outcomes of stakeholder engagement processes and covered significant organizational impacts in a balanced and transparent manner.

Material Topics and ESG Impact Areas

Our materiality assessment identified 19 material ESG topics that guide the governance and implementation of our ESG strategy and efforts. *Information Security and Privacy* was added as a topic to monitor in 2020, due to emerging trends and risks; therefore, we report on 20 topics in this document.

ESG IMPACT AREA	TOPIC NAME	DESCRIPTION
Environmental		
Operational Environmental Impact	Energy	Energy used in our operations.
	Water	Water used in our operations.
	Waste	Waste resulting from our operations.
Environmental Compliance	Environmental Compliance	Complying with environmental laws and regulations.
Climate Change	Climate Change Resilience	Financial implications, risks and opportunities associated with climate change.
	GHG Emissions	Greenhouse gas emissions resulting from our operations and supply chain.
Social		
Safety and Security	Occupational Health and Safety	Initiatives to measure, manage and reduce safety incidents, and promote employee health and wellbeing.
Employment and Workforce	Employee Training and Education	Investments in our employees' development.
	Employment Practices	Professional opportunities and employee benefits delivered by our firm.
Inclusion and Diversity	Diversity and Equal Opportunity	Initiatives to promote opportunities and equal wages for employees of diverse backgrounds at all levels of our business.

MANAGING OUR ESG IMPACTS

ESG IMPACT AREA	TOPIC NAME	DESCRIPTION
	Non-Discrimination	Promoting a culture that encourages a workplace and organization free from discrimination.
Community and Society	Local Community Impacts	Benefits delivered to local communities through charitable donations, pro bono work and volunteering.
	Indigenous Relations	Supporting and respecting the rights of Indigenous Peoples in communities where we work.
Governance		
Financial Performance	Financial Performance	Economic value generated and distributed through our business activities.
Projects and Clients	Technical Excellence and Innovation	Advancing a culture of innovation to deliver projects and services, including through WSP's Future Ready®[1] program.
	Project Impacts	Direct and indirect economic, social and environmental impacts associated with projects delivered by WSP.
	Clean (Green) Revenues	We define Clean Revenues as revenues earned from services that have a positive impact on the environment and that support the UN Sustainable Development Goals. We had previously defined a narrower sub-set of revenues as Green Revenue as part of our sustainability-linked credit facility. Green Revenues are those earned from services that have a positive environmental impact.
Ethics	Ethics and Integrity	Business practices that serve to prevent corruption and human rights violations.
Information Security	Information Security and Privacy	Ensuring effective information security practices and security of systems across our business, including the protection of information and the privacy of personal information of our clients, employees and business partners.

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[1] Future Ready® is a registered trademark of WSP Global Inc. in Canada and New Zealand. WSP Future Ready (logo)® is a registered trademark of WSP Global Inc. in Europe, Australia and in the United Kingdom.

MANAGING OUR ESG IMPACTS

ESG IMPACT AREA	TOPIC NAME	DESCRIPTION
Supply Chain	Supply Chain	Monitoring for impacts and practices beyond our own operations by screening suppliers and communicating our ESG policies and expectations.

We categorize our material topics into "ESG impact areas" in order to communicate the interconnectivity of ESG impacts, enhance internal cross-functional collaboration, and streamline management processes and practices. Below, we describe the management approach for each of our ESG impact areas, in line with GRI 103: Management Approach 2016.

ENVIRONMENTAL IMPACT AREAS

ESG Impact Area: Operational Environmental Impact	
Related Material Topics	**Boundary**
Energy *Water* *Waste*	**Boundary:** The efficiency with which we use resources in our operations impacts the environment.

IMPACT AND IMPORTANCE (GRI 103-1)

Since we are a professional services organization, WSP's operational environmental impacts are primarily associated with our offices, the majority of which are leased and in buildings shared with other tenants. We consume electricity at each office and some offices also use natural gas, district heating and cooling, and diesel fuel for emergency generators.

We consume water in office kitchens and washrooms and generate mostly non-hazardous office waste, with limited quantities of special or hazardous waste (e.g., fluorescent bulbs, batteries, electronic waste). We withdraw all our water from third-party sources, such as municipal water suppliers, and our wastewater is discharged to municipal treatment facilities. Due to our relatively small footprint, we have not identified any substantive water-related impacts associated with these activities, and thus have not engaged stakeholders to manage water as a shared resource.

Our operational waste is relatively small in comparison to project and value chain-related waste impacts. We implement recycling in all offices wherever possible and endeavour to incorporate composting and circularity efforts in our operations. We expect our landlords to work with us to responsibly manage waste. In select cases where we are responsible for managing waste disposal or recycling, we contract with certified waste management companies authorized to collect and dispose of our waste. Due to our primarily leased operational footprint, waste is managed on a site-by-site basis. Measurement of our annual waste and diversion rate varies greatly based on the number of offices that report actual waste data.

We are committed to measuring and managing environmental performance and practices in our operations and within our supply chain and improving them over time. Managing and reducing our operational impacts contributes to a healthier environment, and equally important, fosters a culture where our employees and partners are inspired to reduce their environmental impacts in their work and daily lives. Value chain environmental impacts are covered under the "Supply Chain" and "Project Impacts" sections below.

OUR APPROACH (GRI 103-2)

Policies and documentation: Global ESG Statement; Global Workplace Guidelines; regional environmental policies (in certain locations)

Energy use and resource consumption from our operations are the responsibility of our Global Operating Team, the Global and Regional Workplace Strategy Team and local Environmental Management System leads. Our

approach to managing energy consumption, water consumption, waste generation and environmental compliance includes:

— Managing our office space in accordance with our Global Workplace Guidelines, which require consideration of sustainability during the leasing and building fit-out process;

— Collecting performance data for our global operations;

— Maintaining awareness of potential business and environmental risks and opportunities associated with resource consumption;

— Monitoring our resource use recognizing that, as an office-based business, we do not have significant waste generation or water consumption impacts;

— Sharing our progress with stakeholders by measuring and disclosing our performance annually;

— Engaging with our suppliers to reduce environmental impacts associated with our supply chain.

In most locations outside of North America, we manage impacts through our ISO 14001-certified environmental management systems (EMS).

EVALUATING OUR PERFORMANCE (GRI 103-3)

We evaluate our performance by comparing energy, water and waste resource consumption data per office and region over time. However, because we primarily lease office space, in many locations, actual measured/metered data or pro-rated building data are not available and are therefore based on industry estimates. Our performance for the past three years is detailed in our global ESG reports.

MANAGING OUR ESG IMPACTS

ESG Impact Area: Environmental Compliance	
Related Material Topics	**Boundary**
Environmental Compliance	Our compliance with laws and regulations within our offices and on project sites impacts the environment, as well as our business reputation.

IMPACT AND IMPORTANCE (GRI 103-1)

We manage environmental compliance associated with our offices and project sites. Complying with environmental regulations, as well as maintaining robust internal policies and practices, is essential for preventing harm to the environment and communities in which we operate, as well as reducing risk to our business.

Since we are a professional services organization, environmental compliance impacts associated with our operations are generally limited to proper handling, storage and disposal or recycling of hazardous and special waste (e.g., electronic waste, fluorescent bulbs, batteries) in compliance with applicable regulations. WSP does not generate a significant amount of hazardous or special waste.

On project sites, WSP ensures compliance with applicable environmental permits to avoid contamination.

OUR APPROACH (GRI 103-2)

Policies and documentation: Global ESG Statement; Health, Safety and Wellbeing Standard 103 - Reporting Requirements; regional environmental policies (in certain locations)

Across our organization, we drive environmental compliance through a number of methods. We leverage the expertise of our internal environmental compliance consultants to ensure we adopt the latest trends and best practices. Within certain regions, our ISO 14001:2015-certified EMS is key to ensuring environmental compliance. An EMS covers the following topics:

— Leadership commitment

— Planning

— Implementation and operation

— Performance evaluation

— Continual improvement

In most countries and regions, the Health & Safety team manages environmental compliance. In other locations, this responsibility falls on a local environmental manager. WSP's Global Environmental Management Committee (GEMC), which includes representatives from over 20 countries, shares best practices on EMS, environmental risk, training and communications, regulations and strategy.

Within our projects, we consider the environmental risks and opportunities from the outset through design, construction, operations and end-of-life. We identify and comply with environmental study and permitting

requirements to avoid, minimize or mitigate impacts to the environment. In some regions, we have developed tools to help our project managers identify and manage environmental impacts and permitting requirements and have provided training on environmental awareness and risk management. This covers activities such as water pollution, noise and nuisance, land contamination, waste, hazardous substances, and vehicle use, that could have a potential environmental impact or damage protected species and habitats. We communicate these risks to our suppliers, sub-contractors and clients. For some projects, we prepare an Environmental Management Plan (EMP) or similar document, which identifies key environmental risks, constraints, relevant regulations, and mitigation measures.

Environmental incident reporting requirements and processes vary by region. We are working to standardize this process at a global level. Several regions report environmental incidents through our integrated Safety Management System (iSMS). An environmental incident is defined as any unplanned incident that has an adverse impact on the environment, including:

— Spill, discharge, emission, waste event, i.e. an uncontrolled release of material into the environment

— Disturbance: nuisance or damage to archaeological sites, habitat, wildlife or local community

The severity of environmental incidents (actual and potential) can be ranked on a 1 (insignificant) to 5 (catastrophic) scale.

EVALUATING OUR PERFORMANCE (GRI 103-3)

We evaluate our performance through auditing and re-certification of our EMS, internal audits, tracking the number of environmental incidents reported in iSMS and monitoring the number of significant fines or material non-monetary sanctions received for non-compliance with environmental laws or regulations.

MANAGING OUR ESG IMPACTS

ESG Impact Area: Climate Change	
Related Material Topics	**Boundary**
Climate Change Resilience *GHG Emissions*	Our approach to GHG emissions reduction, the transition to a low-carbon economy, and climate change resilience impacts the environment, our shareholders, investors, clients, employees and partners.

IMPACT AND IMPORTANCE (GRI 103-1)

The effects of climate change pose an existential threat to global society and the environment. WSP generates direct and indirect (scope 1 and 2) greenhouse gas (GHG) emissions from office energy consumption and refrigerant emissions and from owned or leased vehicle fuel use. We also generate indirect (scope 3) emissions from our supply chain, which includes business travel, employee commuting and work-from-home emissions, purchased goods and services (including upstream transportation and distribution), capital goods, fuel-and energy-related activities (transmission and distribution losses) and waste generated in operations. While we have more control over reducing our scope 1 and 2 emissions, we also recognize the importance of reducing our scope 3 emissions as they represent over 90% of our total global GHG emissions.

Acute or chronic physical and transition risks resulting from climate change pose varying levels of risk to WSP's global operations and activities. We are committed to doing our part to prevent the most catastrophic effects from climate change. We support the transition to a low-carbon economy and climate change mitigation and adaptation efforts through our own operations as well as through our client partnerships, projects impacts and relationships with the communities in which we work.

OUR APPROACH (GRI 103-2)

Policies and documentation: Global ESG Statement; Business Partner Code of Conduct, Global Workplace Guidelines, Global Procurement Guidelines

WSP's Global Corporate Director, ESG is responsible for managing global GHG emissions and climate resilience. In turn, leaders in each of WSP's operating regions are responsible for managing regional GHG emissions reductions plans that align with global targets. Our Global Workplace Guidelines require the consideration of sustainability across our global office footprint, including implementing measures to reduce electricity consumption and thus reduce operational emissions.

We measure our annual scope 1, 2 and 3 emissions in accordance with the GHG Protocol. A third party conducts limited assurance of our GHG emissions as well as our renewable energy and carbon offset purchases. In April 2021, we announced a commitment to achieve net zero across our value chain by 2040, supported by science-based GHG emissions reduction targets certified by the Science Based Targets initiative (SBTi). Our GHG emissions reduction targets are detailed in our 2021 Global ESG Report.

We have also developed a Climate Transition Plan that details our strategy to reduce emissions across our operations and value chain. We are committed to continually assessing, monitoring and responding to the risks

associated with a changing climate, while also providing continuity of services that help our clients manage their own footprints and climate-related risks and opportunities.

To improve the resilience of our operations, ensure the preparedness of our employees, and expand our services to address our clients' needs for ESG and climate resilience services, our approach to managing current and evolving climate-related risks and opportunities aligns with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). We have conducted qualitative and quantitative climate scenario analyses to understand our risks and opportunities from climate change and the transition to a low-carbon economy. For our most at-risk sites, we conducted an adaptive capacity assessment to understand our capacity to manage and mitigate climate-related risks. We engaged with leaders and experts from across our business to conceptually validate our results and discuss potential investment and mitigation strategies. Our scenario analysis used a market and policy-driven approach to identify our exposure to potential climate-related risks and opportunities associated with the low-carbon transition.

EVALUATING OUR PERFORMANCE (GRI 103-3)

We evaluate our performance by measuring annual GHG emissions and tracking against our reduction targets. In parallel, we work to continuously improve our data collection and governance processes, in order to refine extrapolation and management of our GHG emissions and thus create a more accurate and actionable GHG inventory. In addition, an independent third party verifies our GHG emissions annually; a copy of the Assurance Statement is available in our global ESG reports, along with our performance metrics and goals. The risk of inadequately managing the pursuit of our GHG emissions reductions targets and the low-carbon transition is also integrated into our Enterprise Risk Management (ERM) process.

We will continue to enhance our climate resilience and alignment with the low-carbon economy as we refine our processes and pursue our TCFD journey, including through our 2022-2024 Global Strategic Action Plan. More information regarding our TCFD analyses is available in our 2021 TCFD Report and our 2021 Global ESG Report.

SOCIAL IMPACT AREAS

ESG Impact Area: Health and Safety	
Related Material Topics	**Boundary**
Health and Safety	Our approach to these topics has a direct impact on our employees and everyone affected by our projects. Our compliance with laws and regulations impacts our business reputation.

IMPACT AND IMPORTANCE (GRI 103-1)

Our occupational health and safety program identifies hazards with the potential to impair human health and wellbeing and promotes a positive health and safety (H&S) culture that empowers and enables our employees to work in a manner that keeps them safe from harm. The program also helps our employees to identify, consider and effectively remove or reduce the risks associated with our work. All regional programs adhere to our global Expectations for Health, Safety and Wellbeing Management ("Expectations"), which align to ISO 45001 and define minimum requirements for H&S management in all our activities. Ensuring the health, safety and wellbeing of our employees, as well as others who may be affected by our activities, is a core value at WSP on which we do not compromise.

OUR APPROACH (GRI 103-2)

Policies and documentation: Global Health, Safety and Wellbeing Policy; Expectations for Health, Safety & Wellbeing Management; Global Crisis Management Policy

WSP complies with all applicable H&S laws and regulations. Our Global Director of Health, Safety, Environment & Quality is responsible for implementing our H&S program. The GECC, together with the Board, provides leadership and oversees H&S policies and practices. WSP's Global Health, Safety and Wellbeing Policy is reviewed annually.

The Expectations foster a holistic approach to address H&S risks and provide a foundation for all our regions as they implement H&S into all aspects of their work. Our global and regional leadership teams ensure that H&S is integral to the way we work. Taking a proactive approach to safety, each of WSP's regional businesses has risk assessment processes in place, which assist in identifying hazards in workplaces and project sites. Our approach to promoting a positive H&S culture includes:

— Providing visible and tangible leadership;

— Ensuring the H&S management system is maintained and implemented such that it meets or exceeds the requirements of our global H&S policies, local legislation, and adequately addresses local H&S risks;

— Making H&S integral to everything we do by ensuring it is an agenda item at all leadership meetings and is given equal importance to other operational items;

— Setting H&S objectives annually, communicating these to all employees, and monitoring and reporting progress to the Board on a quarterly basis;

— Seeking continuous improvement by encouraging the sharing of best practices and lessons learned across our global operations;

— Ensuring that acquired businesses integrate into our way of working;

— Ensuring an appropriate level of resources and funding to support H&S policies;

— Encouraging open communication with employees on any H&S matters that may affect them;

— Providing feedback and recognition to employees who positively contribute to reducing H&S risks.

Our H&S program is supported by five internal standards prescribing a consistent global approach:

— Standard 101 – Major Incident Response

— Standard 102 – Incident Investigation

— Standard 103 – Reporting Requirements

— Standard 104 – International Travel

— Standard 105 – Global Crisis Management Protocol

All employees operate under regional management systems that meet local statutory requirements and company expectations. In most countries, we manage impacts through our ISO 45001-certified H&S management system. In Canada, our business meets the standards of the Certificate of Recognition program (COR®), which aligns with ISO 45001.

Risk Assessment and Management

As part of a proactive approach to safety, each of our regional businesses has risk assessment processes in place, which assist in identifying hazards in our workplaces and on project sites, enabling effective controls to be put in place aimed at reducing or removing the risks from our activities.

Recording and Reporting Accident Statistics

Our "Standard 103 – Reporting Requirements" sets out the requirements for consistent safety, health and environmental reporting throughout our regions. Each region is responsible for ensuring that the requirements of this standard are incorporated into its management practices and standard operating procedures. At a global level, we encourage all our employees to contribute to our performance by reporting into iSMS, enabling us to learn from adverse events, near misses and other safety observations.

Onsite Safety Equipment and Services

WSP ensures that first aid and appropriately trained personnel are available at all office and project locations. WSP ensures that sufficient personal protective equipment (PPE) is available to all employees visiting project sites.

Training

Employee training on H&S is a measurable performance indicator for all business leaders. Our employees are trained on WSP's approach to H&S and to recognize and report hazards and workplace risks. Workplace H&S documents are clearly displayed in all offices and on work sites, and it is the responsibility of the employee, and the project manager or the site supervisor, to ensure that employees only perform tasks they are trained to perform.

MANAGING OUR ESG IMPACTS

Contractor Health and Safety

Our procurement processes ensure that supplier H&S performance is considered as part of our assessment processes. As a minimum, each supplier must meet or exceed the objectives laid out within our contracting policies and local statutory requirements.

EVALUATING OUR PERFORMANCE (GRI 103-3)

We evaluate our occupational H&S performance using both internal and external standards to prescribe a consistent global approach. We also implement H&S performance goals across our company to drive cultural change and make improvements in our most critical areas.

ESG Impact Area: Employment and Workforce	
Related Material Topics	**Boundary**
Employee Training and Education Employment Practices	Our approach to these topics has a direct impact on the employees inside our organization as well as prospective employees.

IMPACT AND IMPORTANCE (GRI 103-1)

At its core, WSP is a people business. Our success relies on the ingenuity and expertise of employees who deliver Future Ready® solutions to our clients and communities. We are committed to making extraordinary efforts to provide our people with a best-in-class work environment so they can deliver on their full potential.

Across our global business, we continue to invest in and develop a culture focused on empowerment and adaptability, allowing us to deliver growth and adapt to constantly changing environments. We seek a highly engaged workforce, and aim to achieve this through our Guiding Principles.

Our ability to operate and grow requires investment in employee development. Attracting and retaining talent in our industry remains highly competitive; we must remain agile in our approach. Our goal is to provide learning and development opportunities aimed at advancing strategic business priorities, so our people can achieve their full potential. We are committed to maintaining momentum with initiatives that proactively engage and retain employees, as well as soliciting and acting upon regular employee feedback.

OUR APPROACH (GRI 103-2)

Policies and other documentation: Code of Conduct; Global ESG Statement; Global Human Rights Statement; Global Inclusion and Diversity Policy, Health, Safety & Wellbeing Policy

Governance

Our Global Chief Human Resources Officer (CHRO) has global oversight and responsibility for our employment practices and workforce strategy. The CHRO reports regularly to the GECC on critical human capital-related topics, such as talent management, succession planning, inclusion and diversity programs and initiatives, people programs and initiatives and employee engagement. The CHRO coordinates with regional HR leaders to identify challenges and ensure the cohesiveness of our workforce strategy. The GECC has oversight responsibility for inclusion and diversity policies and initiatives, succession planning relating to the positions of the CEO and other executive officers as well as WSP's overall compensation philosophy and strategy.

Talent Attraction, Development and Retention

Human capital management and talent development are crucial to our success. They enable us to be an employer of choice, while delivering value to our clients and other stakeholders. Our efforts to promote talent attraction, development and retention include the following:

- We encourage internal promotion and redeploy talent within our market sectors and operating regions, to leverage internal experience and the expertise and to provide development opportunities to all employees.

- We provide career advancement opportunities and professional development support across our global businesses as a top priority.

- We hold regular performance discussions to ensure the development of our talent.

- We promote an active employee voice culture, with feedback used to inform business decisions; enhance employee experience; and increase engagement. One of the ways we do this is by providing opportunities for all employees to provide anonymous feedback at least annually.

- We have region-specific strategies to support our approach to diversity, including drafting more inclusive and gender-neutral job postings; increasing talent pools through partnerships with professional associations supporting diversity; and making conscious efforts to promote female candidates and members of under-represented group for all roles. Training to remove bias in the employee selection process is also provided for our global Talent Acquisition group, which is made up of representatives from all our regions.

Learning and Development

A wealth of information and training is available to all employees so they can develop their knowledge and skills. Accessible from online portals in all regions, these learning options include workshops, webinars and self-paced e-learning modules, either designed internally or purchased from external providers such as LinkedIn or Udemy. Our approach to fostering employees' development ranges from onboarding training to professional growth programs covering:

— Technical expertise

— Client and project management

— Leadership capabilities, partnering with recognized educational institutions

— Essential professional skills

— Career development.

Although we develop and deliver most of our learning and development initiatives locally, we foster collaboration and knowledge sharing through our Talent Management Community of Practice, which includes regular sessions with our learning and development experts across all regions.

Succession Planning

WSP conducts succession planning annually for the Global CEO position and other key members of senior management, as well as for all regional leadership team members. We maintain a succession plan for each critical position that considers various time horizons, with potential internal succession described as "ready now", "short-term ready within up to five years", or "long-term ready in more than five years". In addition, an "emergency" plan for short-term absences is established. For more information on succession planning, please consult our 2022 Management Information Circular, on page 44.

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Flexible working

At our WSP offices, we aim to offer a flexible, agile, yet structured work environment that capitalizes on both in-person and remote work. Across the global business, we have implemented or are implementing a hybrid working model. We have a focus on maximizing collaboration and meeting the development needs of various employee groups, while prioritizing the needs of our clients. Each region is devising hybrid work arrangements to support its local operations, based on knowledge of our people, client and business needs. In most of our regions, we communicate with employees about the use of leave or flexible work hours for caregiving and personal health-related reasons, including mental health. We also support flexible work schedules in most regions.

Wellbeing

Wellbeing is immensely important for WSP; all our major regions provide wellbeing programs for employees. These programs offer a range of resources to support employees' physical, mental, social and financial wellbeing. Access is open to all via our intranets and typically includes a mixture of reading resources, webinars, e-learning courses, competitions, online health assessments and links to specific support by external providers. In addition, most regions have a network of employee health and wellbeing champions, tasked with supporting programs at a local level. Sharing initiatives between our regions also boosts the reach of our wellbeing initiatives and encourages collaboration. For more information on wellbeing, please consult our 2022 Management Information Circular, on page 45.

Employment Benefits

Wherever legally possible, WSP offers competitive benefits to ensure a positive employee experience, including physical and mental wellbeing. A benefits review for our principal operating regions is presented in our annual global ESG reports.

Collective Bargaining and Freedom of Association

In accordance with our Global Human Rights Statement, we allow our people the freedom to join any association or union, providing it does not contravene local law, as well as the right to collective bargaining, where applicable.

Grievance Reporting

For a description of our reporting mechanisms, including our Business Conduct Hotline, please see our management approach on Ethics and Integrity.

EVALUATING OUR PERFORMANCE (GRI 103-3)

We evaluate our employee training, education and employment practices by monitoring and managing data on metrics including our hiring and employee turnover rates, employee benefits, and time spent on learning and development activities.

ESG Impact Area: Inclusion & Diversity	
Related Material Topics	**Boundary**
Diversity and Equal Opportunity Non-Discrimination	Our approach to these topics has a direct impact on the employees inside our organization, as well as on prospective employees.

IMPACT AND IMPORTANCE (GRI 103-1)

WSP aims to foster a stimulating and safe work environment where our people flourish personally and professionally, regardless of their position, background or gender. Maintaining high standards of governance in all aspects of our business, including inclusion and diversity, and recognizing the importance and benefit of teams comprised of highly talented, diverse and experienced individuals is top of mind across all regions. We are committed to promoting a culture that empowers its people through a work environment where inclusion and diversity is both expected and valued.

OUR APPROACH (GRI 103-2)

Policies and documentation: Global Inclusion and Diversity Policy, Code of Conduct, Business Partner Code of Conduct

Governance

WSP's Global Chief Human Resources Officer (CHRO) and Global Sponsor, Inclusion & Diversity (I&D) are responsible for implementing WSP's Inclusion and Diversity program and leading the Global I&D Strategy. In 2022, WSP also named a Global Director, I&D, reporting to the Global CHRO. Both the Global Sponsor and Global Director monitor and help define WSP's global vision and priorities, as well as lead global initiatives. The Global I&D Strategy was refreshed for 2022-2024 and articulates our vision of having WSP recognized by our people, peers and clients as a safe, inclusive workplace where our people promote an authentic and inclusive culture. This strategy sets the foundation for each region in the development of their local targets, initiatives and key activities.

WSP's Global I&D Network includes representatives from all regions and is a forum for sharing practices and promoting continuous improvement. Several WSP regions also have regional I&D Councils and employee resource groups.

WSP continues to work towards a diverse and balanced workforce, which we believe represents a greater mix of skills and more inclusive workplace culture. Our Global Inclusion and Diversity Policy reflects WSP's long-term vision, approach and minimum standards. All of WSP's regions have developed (I&D) priorities and are continuing to mature their action plans to align with, support and promote the policy. Our approach to building an inclusive and diverse culture that respects and maximizes the contribution of all our employees, as well as prospective employees, includes:

⎯ **Fostering a Trusting Workplace**: We aim to provide a safe and trusting work environment for all our people.

⎯ **Speaking Up**: Abiding by our Guiding Principles, we accept no compromise when it comes to our ethics and inclusive behaviour, and we enable our people to feel at ease to speak openly.

— **Managing Fairly**: We promote equal opportunity and fairness in a consistent manner.

— **Growing Stronger Together:** As a global community, we celebrate our differences and share our learning.

Equal Opportunities

We are committed to providing equal opportunities in employment. We do not tolerate any harassment or unlawful or unfair discrimination against employees or contract staff in our recruitment and employment policies, terms and conditions, procedures, processes and decisions on various grounds, including race, colour, nationality, national or ethnic origin, gender, marital status, sexual orientation, part-time or fixed-term status, disability, age, religion or belief. WSP internally monitors and addresses discrimination incidents in accordance with corporate policy.

Equal Remuneration

WSP's Global Human Rights Statement promotes fair and equal treatment of employees, free from discrimination, where compensation decisions are made solely based on merit, ability and performance. WSP monitors pay equity data internally. We are committed to equal pay for our employees and continue to increase our efforts to strengthen our balanced approach to compensation. Given the global scope of our organization, and our extensive acquisition strategy, we work internally on action plans, which are updated annually, and to prioritize equal remuneration strategies with stakeholders.

EVALUATING OUR PERFORMANCE (GRI 103-3)

We evaluate our diversity and equal opportunity practices by measuring progress against established targets as set forth in our 2022-2024 Global Strategic Action Plan and measuring reported incidents of discrimination. Our performance against established targets is available in our global ESG reports.

ESG Impact Area: Community and Society	
Related Material Topics	**Boundary**
Local Community Impacts *Indigenous Relations*	Through our business, we have the potential to directly and indirectly impact the communities in which we work.

IMPACT AND IMPORTANCE (GRI 103-1)

WSP recognizes the collective rights of local communities, and we strive to contribute positively to the communities where we work. Collaborating with and respecting the communities where we operate create value for our employees, society and our business. We also aim to engage with Indigenous/Aboriginal communities in a respectful, appropriate and mutually beneficial manner.

OUR APPROACH (GRI 103-2)

Global policies and documentation: Global ESG Statement; Global Human Rights Statement

Regional policies and documentation: Canada's Indigenous Relations Policy; Australia's Reconciliation Action Plan: Stretch/November 2021 - November 2024

WSP believes that for societies to thrive, we must all hold ourselves accountable for tomorrow. Our Global ESG Statement confirms that we will give back to the communities where we live and work with time and resources.

Our commitment to making a positive contribution to our communities is exemplified by the framework we have developed for our philanthropic program, "Thrive", which is linked to our contribution to the United Nations' Sustainable Development Goals. These efforts take the form of investments, partnerships and pro-bono expertise, all guided by the passion of our people. Thrive was launched in Canada during the last strategic cycle, and we now plan to roll it out globally during the current (2022-2024) strategic cycle, to better measure collective impact across our business.

We generally employ a regional approach to supporting communities and managing Indigenous relations so that our efforts meet local and specific needs. Managing our relations with local and Indigenous communities at a regional and local level enables us to be agile and responsive to emerging challenges. For example, we use regionally-focused strategies in our Canadian, Australian and New Zealand business units to manage our relations with Indigenous Peoples. However, several of our global regions also communicate regularly with each other on the topic, as part of our internal Indigenous Relations Network. This allows us to share our stories and build a dialogue that respects local and regional strengths, while drawing on global collaborative support. Members of the network can be contacted by our employees, or any external stakeholders, by email at the following address: indigenous@wsp.com.We describe our local programs and efforts related to local and Indigenous communities in our global ESG reports.

EVALUATING OUR PERFORMANCE (GRI 103-3)

Our greatest success markers are the formation of long-term partnerships with local communities and Indigenous groups in the areas where we operate. To measure progress and performance, we track our community involvement and charitable donations in most of our regions. Success in our Indigenous relations depends on building long-term relationships and reinforcing a culture of sharing. In addition, to address our responsibilities, we gather information from our regions to ascertain whether we have had any material incidences of non-compliance with the rights of Indigenous Peoples.

GOVERNANCE IMPACT AREAS

ESG Impact Area: Financial Performance	
Related Material Topics	**Boundary**
Financial Performance	Our approach to this topic impacts our investors, shareholders, employees and partners.

IMPACT AND IMPORTANCE (GRI 103-1)

WSP Global Inc. is a corporation existing under the Canada Business Corporations Act. We are publicly listed on the Toronto Stock Exchange under the symbol "WSP". As a publicly listed company, WSP reports its financial performance on a quarterly and annual basis and in accordance with the International Financial Reporting Standards (IFRS). We recognize the importance of responsibly managing and reporting our financial performance to strengthen our relationship with investors, shareholders, employees and partners.

In addition, our stakeholders, including investors and shareholders, increasingly require reporting on non-financial metrics to consider alongside our financial performance. Indeed, our ESG performance has an impact on decisions regarding investment in our firm. This includes reporting on our climate risks and opportunities. By providing transparent disclosures, we also strive to mitigate potential financial consequences from sustainability risks and opportunities.

OUR APPROACH (GRI 103-2)

Policies and documentation: Code of Conduct, Global ESG Statement, Financial Risk Management Policy

NI 52-109 – Financial Compliance and Internal Controls

WSP ensures that there are adequate processes to assess the effectiveness of internal controls over financial reporting and disclosure controls to meet applicable regulatory requirements in a timely fashion. The Chief Executive Officer (CEO) and Chief Financial Officer (CFO) personally certify the adequacy and effectiveness of the internal controls over financial reporting for each quarter. In order to certify adequacy and effectiveness of internal controls, pre-defined controls are tested annually.

Investor Engagement

WSP holds "investor days" or similar events (breakfasts, site visits, virtual conferences, presentations by senior officers, quarterly earnings and acquisition-specific calls and other meetings, etc.) on a periodic basis at which Management can exchange with analysts, shareholders and other stakeholders. During these meetings, Management provides an update on operations, performance and outlook while making sure to respect its disclosure obligations and avoid any selective disclosure. These meetings also provide the opportunity to raise questions and concerns to Management regarding WSP's business and affairs. Feedback from shareholders comes from one-on-one or group meetings, in addition to regular interactions on specific questions between our investor relations department and shareholders. Investor relations conferences, and results conference calls are broadcasted live through our website.

MANAGING OUR ESG IMPACTS

Strategic Financial Planning

Our 2022-2024 Global Strategic Action Plan describes how we will drive leading performance and efficiency by further investing in our people, technology and platform and by transforming the organization through a simplification mindset and increased agility and innovation. The plan also presents our 2022-2024 strategic financial ambitions.

Tax Transparency

Countries across the globe rely on taxes to fund their public expenditures, including infrastructure investment. We believe that for societies in different countries to be sustainable, public expenses and revenues must be balanced. In this context, multinational corporations like ours have a moral obligation to contribute their fair share of taxes in the countries where they operate. We strive to comply with local and international tax legislation, and we maintain open and constructive relationships with the tax authorities, adhering to high standards of tax governance.

We recognize that tax transparency can add value to our business, investors and other stakeholders. Therefore, we adopted the GRI standard on tax reporting (GRI 207: Tax) to assess the maturity of our existing Global Tax Strategy, governance and risk management frameworks and align these with our ESG strategy. We undertake these activities with a view to providing increased informative and transparent tax disclosure. Our Code of Conduct and Guiding Principles extend to our tax function.

— **Integrity in Compliance and Reporting:** We have systems, processes and controls in place to identify, monitor, manage and escalate tax risks. These processes aim to ensure that our tax affairs are well managed, so that we fulfil all tax compliance and reporting obligations and pay the correct amounts of tax in a timely manner.

— **Tax Planning:** We built the internal profile for the tax function by partnering with our business functions to understand and advise on the tax implications of commercial activities. In doing so, we consider, alongside commercial, strategic and risk factors, the tax laws of the countries in which we operate.

We pride ourselves on being locally dedicated with international scale, and we establish entities in jurisdictions where we undertake actual business activities to ensure we operate within the tax laws of those jurisdictions. Wherever tax incentives and exemptions are implemented by governments to support economic development, we seek to apply them in the manner intended and to provide value to our clients and our shareholders in line with our business goals.

— **Controlling and Managing Risk:** Given the size of our business and tax obligations, risks will arise from time to time. These risks may stem from the interpretation of complex tax laws or the nature of our international tax arrangements. By demonstrating appropriate professional diligence and care, we actively seek to identify, quantify, monitor and manage these risks to ensure they remain in line with our business goals.

— **Transparency:** We engage with tax authorities with honesty, integrity, respect and fairness. Wherever possible, we do so in a transparent and timely manner to minimize tax risk. We do not take positions on tax matters that may create reputational risk or undermine our reputation for fair dealing with tax authorities. If we disagree with a tax authority's ruling or decision, we seek to resolve the issue through active and transparent discussions.

EVALUATING OUR PERFORMANCE (GRI 103-3)

WSP evaluates financial performance in a variety of ways, including through measurement and disclosure of quarterly results such as net revenues, adjusted EBITDA, adjusted EBITDA margin, adjusted net earnings, adjusted net earnings per share, free cash flow and days sales outstanding (DSO). Starting in 2022, we will report our tax income contribution in our global ESG reports. Additional information is available in our annual audited consolidated financial statements for the year ended December 31, 2021, and related Management's Discussion and Analysis available on our website and on SEDAR. Information on our climate risks and opportunities is also available in our global ESG reports and 2021 TCFD Report.

ESG Impact Area: Projects and Clients	
Related Material Topics	**Boundary**
Technical Excellence and Innovation *Project Impacts* *Clean (Green) Revenues*	Our projects and innovations have the potential to broadly impact the environment, as well as the communities in which projects are located.

IMPACT AND IMPORTANCE (GRI 103-1)

We understand that innovation is critical to our success, as well as that of our clients and partners. In a rapidly changing world, creativity, agility and collaboration enable us to solve evolving challenges and position our company for long-term success. Future Ready®, WSP's flagship innovation program, drives a mindset shift towards developing solutions for long-term resilience and adaptability. WSP's culture of innovation creates a strong platform for sharing knowledge, incubating new ideas, enhancing career development and building collective wisdom.

As a professional services firm, we know that our greatest impacts (positive and negative) come from the project work we do with our clients. Whether inspecting bridges and infrastructure or creating plans for cities to manage and adapt to climate change risks, our innovation and influence help WSP contribute to a healthier and more prosperous environment, economy and society. The way we plan and design projects can have positive or negative impacts on land use and biodiversity, GHG emissions, water availability and quality, social value and climate resilience, among other issues. Our Clean Revenues are a key measure of how well we are succeeding in providing services that are beneficial for the environment and contribute to the UN Sustainable Development Goals (SDGs).

OUR APPROACH (GRI 103-2)

Policies and documentation: Global ESG Statement

Our approach to innovation and how we are applying future-ready thinking to projects we deliver includes:

— Implementing our Future Ready® program throughout project delivery

— Investing in our Practice Area Networks (PANs) to enhance our ability to efficiently share technical expertise globally

— Upgrading our employees' professional skills to sharpen expertise in multi-disciplinary solutions

— Maintaining our Global Innovation Platform, a digital inventory of WSP's innovation solutions, processes, research projects, and design tools

— Expanding our Innovation Hub to celebrate our people's ingenuity and leverage successful solutions to offer to clients.

Under our 2022-2024 Global Strategic Action Plan, we are planning to expand our digital advisory services. Across a wide variety of our projects and clients, enhanced technological capability and digitization play critical roles in project success. This expansion of digital services will include:

— Investing in Digital Centres of Excellence to share technical expertise globally

MANAGING OUR ESG IMPACTS

— Expanding our skillset and expertise in digital and data analytics

— Scaling through key hires and niche acquisitions to expand our range of capabilities

— Assembling project delivery platforms that allow better sharing of tools and practices

Overall, we plan to continue to diversify our business across geographies, services and sectors over the coming years. Our focus on innovation and digital services will help us to grow, respond to emerging challenges and market changes, and position our business for success in the long-term.

EVALUATING OUR PERFORMANCE (GRI 103-3)

We report on our innovation and project performance throughout our global ESG report, which highlights how we are applying future-ready thinking in practice to projects we deliver. To understand how our projects create positive impacts, we globally measure and report the percentage of clean revenues. We also measure the number of employees who have taken Future Ready® training and the number of innovations added to our Global Innovation Platform. We are committed to enhancing the measurement of our project impacts, such as tracking project-associated GHG emissions, in the future.

ESG Impact Area: Ethics	
Related Material Topics	**Boundary**
Ethics and Integrity	Our business practices impact the reputation of our firm in the business community and with our business partners.

IMPACT AND IMPORTANCE (GRI 103-1)

WSP's reputation depends on our ability to be outstanding professionals, which means acting with honesty, integrity, and respect in our day-to-day dealings with colleagues, clients and other business partners. The success of our Ethics and Compliance program, which notably includes anti-corruption, fair competition and human rights, is one of our top priorities.

OUR APPROACH (GRI 103-2)

Global policies and documentation: Code of Conduct; Anti-Corruption Policy; Gifts, Entertainment & Hospitality Policy; Insider Trading Policy; Public Disclosure Policy; Global Human Rights Statement; Fair Competition Policy; Working with Third Parties Policy; Business Partner Code of Conduct; Global Inclusion and Diversity Policy; Reporting and Investigation Policy; High-Risk Countries and Sanctions Compliance Policy; Global Delegation of Authority;

Select regional policies and documentation: Regional Delegations of Authority, regional Gifts, Entertainment and Hospitality guidelines; US Anti-Trafficking Policy; UK Slavery Prevention Policy; UK Modern Slavery Statement, Swedish Code of Conduct for Suppliers

Code of Conduct
WSP has a global Code of Conduct and underlying documents, such as an Anti-Corruption Policy, a Fair Competition Policy and a Global Human Rights Statement (collectively, the "Code"). The Code applies to all operating entities as well as to our directors, officers, employees and contract workers. It is available in more than 15 different languages to facilitate its use in regions where WSP primarily operates. More information regarding the Code and related training is available in WSP's 2022 Management Information Circular. The Code and other global and regional policies are accessible to all employees through WSP's intranet sites. The Code as well as most of its underlying policies are also available to the public via WSP's website.

Employees can obtain expert practical advice on ethics and compliance matters by contacting WSP's regional or global Ethics and Compliance representatives, or by using our dedicated ethics mailbox.

Governance
The Ethics and Compliance program is managed by the Chief Ethics and Compliance Officer (CECO), whose performance assessments and incentives are contingent on the program's successful implementation. The CECO reports directly to the GECC. The Board, through the GECC, has oversight of ethics and compliance activities, and a quarterly progress report is presented to the GECC by the CECO.

MANAGING OUR ESG IMPACTS

Anti-Corruption and Training
As described in the Code, WSP has a zero-tolerance policy to all forms of corruption. We are subject to strict anti-corruption laws and regulations, including the Canadian Corruption of Foreign Public Officials Act, the United States Foreign Corrupt Practices Act, and the UK Bribery Act.

As our success and reputation depends upon the trust of clients and other stakeholders, our commitment to maintaining zero tolerance to all forms of corruption extends beyond regulatory compliance. For instance, WSP strives to keep the topic top of mind for employees, notably through extensive ethics and compliance e-learning onboarding and refresher training, live training sessions, regular communications, and tailored compliance tools.

Management of Gifts, Entertainment and Hospitality and Conflicts of Interest
One of the tools we use to identify and manage gifts, entertainment and hospitality (GEH) as well as conflicts of interest is the Compliance Registry, which is accessible to all employees through our intranet sites. In addition to our global Gifts, Entertainment and Hospitality Policy, regional guidelines on GEH are also available for employees in all operating regions. These guidelines include monetary thresholds, as well as information on local customs.

Business Conduct Hotline
WSP's Business Conduct Hotline ("Hotline") provides a means for employees, business partners and suppliers, as well as the general public, to raise issues or concerns confidentially and anonymously with a third-party service provider. The Hotline is accessible through a direct click from the front page of the global and regional intranets, WSP's website, and regular communications campaigns. Further information on the Hotline is available on the [website](#).

Investigations governance processes are in place to ensure the consistent review and handling of reported cases. In addition, WSP is committed to a workplace culture where employees feel safe to raise concerns at any time without fear of retaliation. Acts or threats of retaliation would constitute a serious violation of the Code. After investigation, anyone found to have engaged in retaliation is subject to disciplinary action, up to and including dismissal. For further information, please refer to the [Reporting and Investigations Policy](#), which is available on our website.

Risk Assessment
WSP's risk factors are described in the annual Management's Discussion and Analysis under "Risk Factors".

In addition to the tools and processes described in this document, WSP assesses risk for ethics and compliance matters in several ways, most notably through:

— Enterprise Risk Management (for further information, refer to the "Risk Management" section of the 2021 Global ESG Report).

— Due diligence and monitoring procedures for business partners, as described in the Working with Third Parties Policy.

— Binding third parties to WSP's business standards, notably through the Business Partner Code of Conduct.

— A global High-Risk Countries and Sanctions Compliance Policy and associated list of high-risk countries.

The High-Risk Countries and Sanctions Compliance Policy names the countries and regions deemed high risk for ethics and compliance or health and safety, and establishes requirements and governance to conduct business in

such locations. As part of the related process, clients and business partners operating in high-risk locations are subject to due diligence regarding sanctions, debarment, reputation, human rights violations and adverse news. The High-Risk Countries and Sanctions Compliance Policy is updated regularly and available to all employees via our intranet.

Business Partner Code of Conduct

At WSP, relationships with business partners are an integral part of day-to-day business and are governed by WSP's Working with Third Parties Policy. WSP expects its business partners to act lawfully and in accordance with the principles set out in WSP's Business Partner Code of Conduct ("Business Partner Code"), which contains guidance on compliance; human rights and equality; health and safety; sustainability; integrity; confidential information and systems access; and accurate recordkeeping.

Human Rights

As a company with a global presence, we are aware that there is indirect risk concerning human rights, through our supply chain. We have a Global Human Rights Statement, stating our commitment to human rights standards and setting out the framework within which we uphold this commitment. The statement is based on a six-step approach:

1. We provide a professional and secure work environment.

2. We promote equality and fair labour standards.

3. We have zero tolerance for modern slavery.

4. We respect the traditions, cultures and laws of the places we work.

5. We partner with like-minded third parties.

6. We promote a speak-up culture.

In respecting the traditions, cultures and laws of the countries in which we operate, the Business Partner Code also supports our global approach to human rights, stating that business partners are expected to:

— Adopt practices that safeguard human rights in all their dealings.

— Not engage in or with any form of modern slavery, human trafficking or activities that encourage human trafficking, including any use of forced, enslaved, compulsory, bonded or prison labour at any level of their supply chain and regardless of local customs.

— Avoid coercing labour or suppressing reports of mistreatment by threats of penalty at any level of their supply chain.

— Avoid engaging in the use of child labour and align their practices with those set out in the International Labour Organization's Minimum Age Convention.

— Allow their employees to leave their positions freely or to terminate their employment with reasonable notice.

— Never require employees to surrender government-issued identification or work permits as a condition of employment.

— Be open and transparent about their recruitment practices, policies and procedures in relation to modern slavery and take steps that are consistent and proportionate with their sector, size and

operational reach.

EVALUATING OUR PERFORMANCE (GRI 103-3)

The Ethics and Compliance program is also evaluated through internal monitoring and audit by WSP's Internal Audit team. Ongoing assessment of the Ethics and Compliance program is carried out through key metrics, including use of internal reporting mechanisms such the Hotline.

The maturity of our Ethics and Compliance program is also assessed periodically by independent external third parties, such as Ethisphere. Following a 2020 audit by Ethisphere, WSP was awarded the Compliance Leader Certification for 2021 and 2022, which reflects the quality of WSP's program.

We also have the capacity to audit our third parties for corruption-related matters. These audit provisions are included in WSP's supplier anti-corruption contract clause and in the Business Partner Code.

ESG Impact Area: Information Security	
Related Material Topics	**Boundary**
Information Security and Privacy	Our security and privacy practices impact the reputation of our firm in the business community and with our clients, suppliers and employees.

IMPACT AND IMPORTANCE (GRI 103-1)

WSP depends upon its information systems for its continued and successful operation. Our reputation with our clients and our employees depends on the diligence we exercise regarding data protection. We are committed to exercising care and implementing controls that keep client, employee and WSP data safe and secure.

OUR APPROACH (GRI 103-2)

Global cornerstone policies: Global Information Security Policy; Global Privacy Policy

Governance

Our Global Information Security Committee is responsible for aligning Information Security with business objectives, and performance of the Data and Information Security Management System (DISMS). The Global Information Security Committee has executive representation from the CFO and Chief Legal Officer, and includes the Chief Information Security Officer (CISO), who reports to the Chief Information Officer within the governance framework.

The Global Information Security Committee approves the current and proposed levels of security maturity, the program roadmap and required investment, and members take collective responsibility for achieving security in each function (e.g., Human Resources, Workplace Strategy, Operations).

The Audit Committee of the Board ("Audit Committee") receives a quarterly Information Security update presented by the CISO. Two of the three independent members of the Audit Committee, Suzanne Rancourt and Paul Raymond, are recognized experts with extensive knowledge of and experience in the technology and IT industries.[2]

WSP's Global Privacy Program Charter sets out the roles and responsibilities of the Global Privacy Office and outlines WSP's privacy strategy and the principles on which WSP's Privacy Program is founded. In turn, the principles support our business activities. A global network of privacy representatives is in place to assist the regional senior leadership teams with implementing the Privacy Program at the regional level and to provide guidance regarding privacy and data protection matters. WSP's Privacy Program is overseen by the Global Privacy Lead, who reports to the CECO.

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[2] See the 2022 Management Information Circular for further details, page 34.

Information Security and Privacy Programs

WSP's Information Security and Privacy programs are supported by two cornerstone policies: the Global Information Security Policy and the Global Privacy Policy.

— The Global Information Security Policy defines the scope of information security and sets out WSP's responsibilities for protecting client, employee and corporate information.

— The Global Privacy Policy sets out our framework for the protection of personal information, including personal information relating to employees, independent contractors and that of our clients and business partners. In addition, WSP provides data subjects with detailed information regarding the processing of their personal information. An Employee Privacy Notice is made available on WSP's intranet, and an external privacy policy or privacy notice is made available on each country page of our website.

The Global Information Security Policy is part of a set of end-user policies for WSP that conforms to international standard ISO 27001 and NIST ST 800-53 guidelines. There is a program to certify WSP regions to ISO 27001, where required for market access.

Other policies include the Global Information Classification and Handling Policy, the Global Cloud Services and Application Development Policy, the Global Technical Security Policy, the Global Records Management Policy and the Global Information Security Incident Management Policy, which incorporates the Information Security Incident Management Procedure. Information security objectives are achieved by operating the DISMS. This is a set of policies, procedures, organizational governance and technical, employee and physical controls. WSP also maintains a set of high-level risks in its Enterprise Risk Management (ERM) platform, which includes IT security (see the Corporate Risk Summary for more detail). Our top information security risks are incorporated in the ERM and assigned key risk indicators and controls via the DISMS. Risk mitigation is evaluated on a quarterly basis.

WSP has also put in place a Global Physical Security Policy, which applies to the protection of all WSP assets, including information assets. The policy includes a description of the principles for conducting physical security risk assessments and for applying physical, employee and third-party access controls and restrictions.

All employees and individuals with a WSP email account, including contract workers, are required to undertake annual training on information security, which includes a privacy awareness module. Additionally, information security and the protection of personal information are covered in the annual Code of Conduct refresher training.

Employees can access information about reporting an information security or privacy incident or breach in one click from the homepage of all our intranet sites.

Vulnerability Management

Vulnerability management is governed by our Technical Security Policy, which states that: "All scannable WSP IT assets must be scanned by the tools/technologies and methods established by Information Security." The policy dictates the remediation of critical vulnerabilities within strict timescales. WSP uses multiple tools to detect and remediate vulnerabilities. Both external and internal penetration tests are completed annually via an independent accredited third party.

EVALUATING OUR PERFORMANCE (GRI 103-3)

We evaluate our Information Security performance with a global network of Information Security representatives who complete Information Security assessments and monitor key risk indicators. These indicators include employee assessments such as quarterly phishing training, compliance to hardware standards, vulnerability

reports and incident monitoring. Trending information generated by internal and external security tools is also collated to determine overall performance. Our Global Privacy Program Charter allocates responsibilities for evaluating the level of compliance with its associated policies.

ESG Impact Area: Supply Chain	
Related Material Topics	**Boundary**
Supply Chain	Our supply chain and relationships with suppliers impact ESG issues beyond our direct operations.

IMPACT AND IMPORTANCE (GRI 103-1)

Since WSP is a professional services organization with a global presence, WSP's procurement strategy, governance principles and Global ESG Statement support social and environmental considerations in corporate purchasing and subcontractor selection. Responsibly managing our supply chains helps us maintain trusted partnerships with our clients and partners, which enables business success and mitigates impacts on the environment and local communities.

OUR APPROACH (GRI 103-2)

Policies and documentation: Code of Conduct; Global Human Rights Statement; Business Partner Code of Conduct; Global Procurement Guidelines; Global Delegation of Authority; Global Travel Expense Management Guidelines and Procedures; Procurement Governance Principles

Governance

WSP's Global Procurement team is responsible for streamlining procurement practices throughout WSP's operating regions, and developing governance standards and a global procurement strategy. The Global Procurement team is also responsible for managing major contracts benefitting the global company. Regional procurement teams are responsible for sourcing and procuring goods and services under regional and global supplier agreements and developing regional procurement strategies.

Our Ethics and Compliance program further addresses the management of third-party risks notably by providing anti-corruption and anti-fraud training. In addition, our Business Partner Code supports our approach to ethical business relationships and reflects our zero-tolerance approach to all forms of corruption.

Supplier Qualification and Vetting Processes

WSP expects its business partners to conduct themselves in accordance with its values. Consequently, in WSP's defined third party contracts, third parties agree to comply with WSP's Business Partner Code. Through existing processes and our third-party onboarding and vetting platform, which is currently being rolled out through the global business, business partners respond to a questionnaire and certify their agreement to the Business Partner Code.

Our third-party onboarding and vetting platform is built to collect data related to factors such as financials, ethics and integrity, health and safety, quality credentials, adverse media, diversity and sustainability. Our regions enhance these checks through region-specific procedures, including risk classifications and verification of certifications.

MANAGING OUR ESG IMPACTS

The onboarding and vetting platform, when fully implemented, streamlines onboarding and allows information to flow between various corporate functions with roles in the onboarding process. Dashboard and reporting capabilities allow enhanced visibility regarding business partners that are part of WSP's supply chain and were onboarded through the onboarding platform.

Human Rights

We understand that because we are a global company, risks, including human rights risks, exist within our supply chain. We engage third parties through regional- and context-specific actions as well as our Business Partner Code, to ensure human rights are respected throughout our supply chain.

ESG Factor Integration

WSP embeds ESG factors into its entire procurement cycle in order to select suppliers whose values align with WSP's. In this selection process, WSP uses a percentage weight of ESG factors, which contributes to decision-making in the overall assessment of suppliers. The weighting factors vary depending on criticality, categories and region. Across our global business, the evaluation weight can go up to 15%.

Supplier Diversity

WSP aims to develop more inclusive supply chains with local as well as global suppliers, inviting them to the sourcing process and incorporating social factors into selection and onboarding. We invite all suppliers to self-identify as part of a minority group during the onboarding process and aim to engage with providers that have supplier diversity programs. Several of our regions have formal supplier diversity programs in place.

Identification of Critical Suppliers

WSP identifies suppliers that are critical to its business operations and service delivery to its clients. All these suppliers are supported via a defined governance model, where the regional business or corporate function, as well as the WSP teams managing procurement, measure and control their activities on a monthly or quarterly basis.

Supplier Environmental Performance

Corporate sustainability is one of our procurement guiding principles. Our supplier questionnaire includes mandatory sustainability questions to obtain a better understanding of the maturity of our suppliers' sustainability programs, including their management of GHG emissions. We have started to integrate carbon management into our approach with key corporate suppliers.

Since we are a professional services firm, our purchase of physical goods is principally focused on office supplies and IT equipment. We do not directly procure primary materials such as concrete, steel and wood, except for certain client projects representing a small proportion of our purchasing activities. Nevertheless, we are committed to working with vendors who provide sustainable products and energy efficient equipment, e.g., recycled paper and recycling services for electronic equipment.

Business Travel

In addition to careful consideration of our own travel to reduce emissions, evaluation of travel necessity is considered when engaging suppliers of professional services. If travel is required during a project, in our major regions we extend our general guidelines to reduce emissions to suppliers, with communication of requirements at the beginning of the project. Contracts and Requests for Proposals require the supplier to follow WSP's guidelines

for travel (e.g., the use of economy class on flights up to a certain duration) and are therefore contractually binding.

As regards vehicles, our major regions are re-evaluating our fleets to reduce carbon emissions, as well as adjusting local policies to support those changes.

EVALUATING OUR PERFORMANCE (GRI 103-3)

Once they have been vetted, we evaluate our supply chain and business partner relationships with ongoing monitoring and periodic re-qualification. WSP has governance in place to manage relationships with its key suppliers, reviewing performance on a periodic basis. These reviews cover operational performance as well as sustainability, health and safety and other important aspects of the business relationships, and identify continuous improvement opportunities for both parties.