

Business Partner Code of Conduct



Business Partner

Code of Conduct

As one of the world's leading engineering and professional services consulting firms, WSP is committed to maintaining and promoting the highest standards of conduct, ethics and integrity in all aspects of our business practices and relationships.

We are a signatory to the United Nations Global Compact and actively promote the Ten Principles pertaining to human rights, labour, environment and anti-corruption.

We expect our business partners to uphold the same or equivalent principles and standards of good business as WSP. This Business Partner Code sets out WSP's expectations towards our business partners whenever they conduct business for, on behalf of or in partnership with WSP.

Compliance

Business partners must comply with applicable laws, regulations and associated requirements applicable to the business they conduct, as well as with this Business Partner Code.

They are expected to ensure that these standards and principles apply to their own business partners and throughout their supply chain.

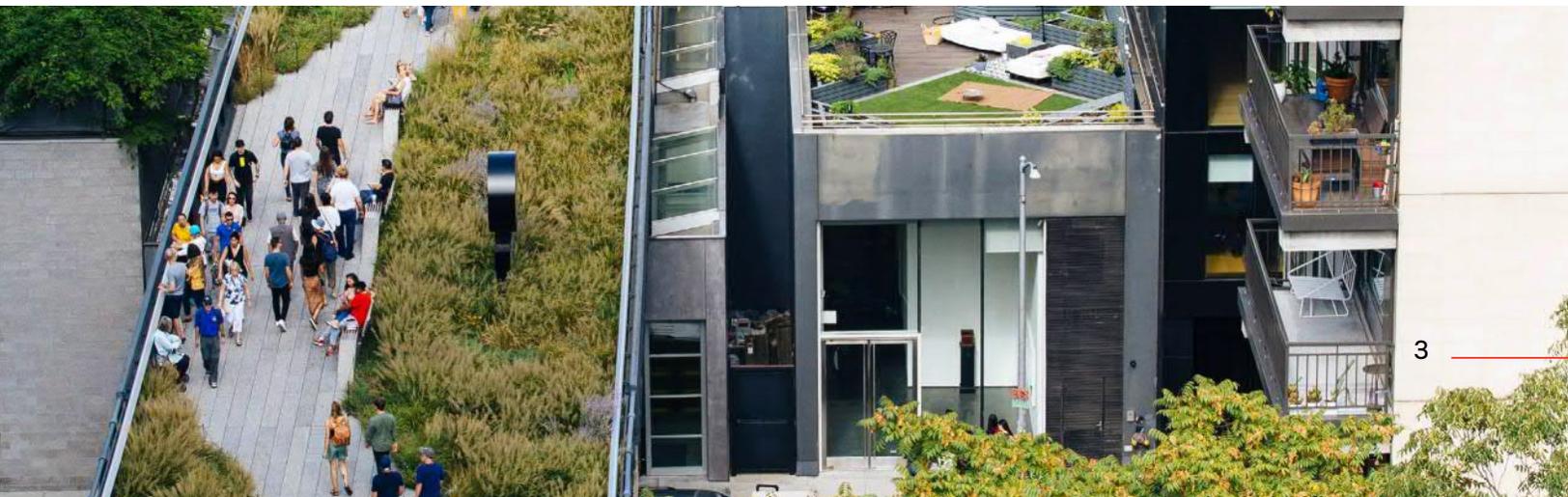
Business partners must never act in a way that could cause WSP to violate laws or regulations or expose it to any penalties. Any violations of a law, regulation or non-compliance with this Business Partner Code may lead to stringent measures, including termination of the business relationship.

Human Rights and Equality

WSP promotes equality, diversity and inclusion and safeguards human rights. Business partners must comply with applicable modern slavery and human trafficking laws and regulations.

They 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.



Health and Safety

WSP puts the safety of all employees first. We treat occupational health and safety as a priority by actively monitoring, preventing, reducing or removing safety risks.

Business partners must comply with applicable health and safety laws, regulations and industry requirements. They are expected to:

- Protect anyone who accesses a work site or takes part in a business activity.
- Implement standard work instructions and provide appropriate personal protective equipment.
- Provide training, procedures and similar guidance in a language that employees understand.
- Implement a health and safety management program to drive continual improvement and transparent reporting.

Sustainability

Employment Practices and Workplace

WSP values a safe and congenial working environment in which everyone is treated with fairness, dignity and respect.

Business partners are expected to:

- Endorse practices that ensure a respectful and safe workplace.
- Provide their employees and supply chain with a work environment that is free of harassment and any discriminatory, violent, harsh or inhumane treatment.
- Respect their employees' freedom to associate, form and join organizations and collectively bargain.
- Offer fair compensation (e.g. minimum wage, maximum hours of work, days of rest) without discrimination and in compliance with local labour laws and regulations.
- Offer equal opportunities to their employees.
- Protect their employees from any form of retaliation.
- Support and encourage a diverse and inclusive work environment.

Environment and Community

WSP recognizes that environmental and social responsibility is essential to providing world-class services. We seek to minimize or eliminate any negative environmental impacts such as resource use, emissions and waste. Business partners must comply with applicable environmental laws and regulations, including permitting requirements. They are expected to:

- Protect the environment and adopt policies, procedures and systems to conduct business sustainably. In all circumstances, they must strive to reduce the environmental impact of their activities.
- Care about the communities they operate in, respect their heritage and listen to their concerns.
- Provide complete and accurate data necessary for WSP and its clients to meet their compliance obligations.
- Prevent pollution and implement response procedures to reduce damage from environmental incidents.
- Report promptly any environmental incidents involving or affecting WSP in accordance with local procedures and contracting requirements.

Business partners are encouraged to:

- Measure, report and reduce their greenhouse gas (GHG) emissions.
- Evaluate climate risks and opportunities and implement climate resilience measures.
- Apply for and maintain ISO 14001 or equivalent certification.
- Communicate their commitment to environmental responsibility to management, employees and business partners.
- Evaluate environmental performance through appropriate audits and issue progress reports.

Integrity

Honest Business Conduct

WSP promotes the highest standards of ethics and integrity in all our dealings.

Business partners must carry out business activities with honesty and transparency, in compliance with applicable anti-corruption and lobbying laws, including Canada's Corruption of Foreign Public Officials Act, the United Kingdom Bribery Act and the United States Foreign Corrupt Practices Act. Business partners must:

- Never accept, request, offer, promise, give or authorize a bribe, kickback, payment or anything of value (financial or otherwise) to obtain an unfair or improper advantage, retain business or influence a third party's actions or decisions.
- Never offer or accept gifts, entertainment or other business courtesies on behalf of WSP without prior documented authorization from WSP.
- Ensure that any business courtesy exchanged is recorded, auditable and suited to the occasion and roles of those involved.
- Never offer or accept business courtesies of more than modest value, offer cash or cash equivalents or exchange any benefit with a public official or other recipient involved in an active procurement process or that would otherwise appear to reward preferential treatment or create an obligation.
- Refrain from making facilitation payments on behalf of WSP or for its intended benefit, even where legal.



Integrity

Conflicts of Interest

Business partners must act in WSP's best interest and must avoid any actual, potential or perceived conflict of interest. Business partners are expected to document adequately any activity that has been approved to proceed despite an identified conflict of interest.

Business partners must promptly disclose in writing to WSP's Ethics and Compliance Office any conflict of interest that has arisen or may arise during their business relationship with WSP, with proposed mitigation strategies.

Fair Competition

WSP values fair, open and transparent competition. Business partners must carry out their activities in a manner that safeguards fair and open competition. They must comply with applicable anti-trust and fair competition laws and regulations. They must never participate in illegal practices such as price fixing, market or customer allocation, market sharing, bid rigging or monopolistic conduct.

Fraud and Money Laundering

Business partners must never engage in fraudulent practices, false claims, criminal facilitation, money laundering or tax evasion. They must have reasonable internal controls in place to prevent, detect and respond to unusual or suspicious activity.

Trade Compliance and Economic Sanctions

Business partners must comply with applicable laws and regulations that govern cross-border trade, export controls, economic sanctions, embargoes and anti-boycott laws, including those administered by the U.S. Office of Foreign Assets Control. Business partners must have reasonable procedures in place to adequately vet their own business partners and supply chain, including ultimate beneficial owners, as necessary. Business partners must never include a contractual clause that would result in the illegal boycotting a of country, entity or person.

Confidential Information and Systems Access

WSP protects confidential and personal information in our care, including information pertaining to WSP, its clients, employees and business partners (cumulatively referred to as “WSP confidential information”). Business partners must comply with applicable privacy and data protection laws and regulations, as well as WSP’s information security policies and contractual requirements when collecting, storing, accessing or processing WSP information. They must also:

- Act with vigilance when handling WSP confidential information.
- Limit the use of WSP confidential information to individuals who require it to perform their work.
- Protect WSP confidential information from unauthorized access.
- Limit the use of WSP confidential information to individuals who require it to perform their work.
- Protect WSP confidential information even after the termination of their business relationship with WSP.
- Report promptly to WSP’s Information Security Office any unauthorized access, use, disclosure or loss of WSP confidential information by the business partner or the business partner’s supply chain.

Access to WSP Systems

Whenever access is provided to WSP applications, network, infrastructure, endpoints or cloud services (WSP systems), business partners must also:

- Make no attempt to bypass any security controls within WSP systems.
- Ensure that any equipment connected to WSP systems is free of and does not contain any codes or mechanisms that collect information or assert control of the systems without WSP’s consent or that may restrict legitimate access to WSP systems.
- Ensure that any equipment connected to WSP systems does not introduce any spyware, adware, viruses, trojans, worms or any other codes or mechanisms via any means designed to permit unauthorized access to or disrupt WSP systems.

Accurate Recordkeeping

WSP relies on complete, accurate and up-to-date books, records and documents, including time sheets, expense reports, gift/entertainment expenses and other transaction records. Business partners must:

- Maintain complete, accurate and honest records for business conducted with WSP.
- Never make false, overstated, artificial or misleading entries or omissions in any systems, books or records.
- Comply with proper recordkeeping and retention practices and applicable standards and laws.
- Grant WSP the right to audit and access all relevant books, records and documents to assess compliance with this Business Partner Code, upon reasonable notice, for a minimum of six years or longer if required by the partnership agreement.

Reporting Suspected Violations

WSP believes in a culture in which everyone is empowered to speak up. WSP is committed to protecting reporting parties from retaliation whenever reports are made in good faith, including when reports come from an external reporting party. We expect our business partners to do the same and to understand and comply with applicable whistleblowing laws and regulations.

Business partners must report promptly any suspected violations of applicable laws or regulations or any WSP policy, including this Business Partner Code or WSP's Code of Conduct. WSP reserves the right to conduct audits and investigate any reasonably suspected breaches. Business partners are expected to cooperate during any such audits or investigations.





Reporting Suspected Violations

Concerns or suspected violations can be reported in the following ways:

- WSP's [Business Conduct Hotline](#).
- A WSP point of contact.
- WSP's [Ethics and Compliance Office](#).

Questions or Comments?

Any questions or comments on the content of this Business Partner Code should be directed to WSP's [Ethics and Compliance Office](#).