Slavery & Human Trafficking Statement



INTRODUCTION

WSP has a zero tolerance policy in relation to slavery and human trafficking and is committed to acting ethically and with integrity in all our business dealings and relationships. We welcome the opportunity presented by the Modern Slavery Act 2015 to conduct a thorough review of our business and supply chain to ensure we are contributing to efforts to combat modern slavery and human trafficking and living up to our own standards of ethical behaviour.

WSP - BUSINESS STRUCTURE

WSP is a global business with approximately 37,000 employees based in more than 500 offices across 40 countries worldwide. All operations, including the UK business, are ultimately owned by WSP Global Inc. a company listed on the Toronto stock exchange. WSP provides services to transform the built environment and restore the natural environment. Our expertise ranges from environmental remediation to urban planning, from engineering iconic buildings to designing sustainable transport networks, and from developing the energy sources of the future to enabling new ways of extracting essential resources.

The following WSP group companies operating in the UK have a turnover in excess of £36 million:

- WSP UK Limited
- Parsons Brinckerhoff Limited
- Mouchel Limited (from 12 October 2016)
- WSP CEL Limited

This statement is made on behalf of the companies listed above but also on behalf of all subsidiaries of WSP UK Limited operating in the UK.

OUR POLICY

The WSP UK policy dealing with anti-slavery and human trafficking can be found here. Our supply chain includes sub-consultants, sub-contractors, general business suppliers, travel agencies and professional services providers, it also includes other businesses within the global WSP business. Also, our Third Party Code of Conduct explains for the benefit of all of our suppliers and our employees our expectation regards ethical behaviour.

We maintain an independent whistleblowing hotline administered by EXPOLINK independent third party and have published the details of that hotline to our employees to ensure employees have the ability to raise an issue confidentially.

ENHANCEMENTS TO OUR PROCESSES

As part of our efforts to place WSP at the leading edge of compliance with the Modern Slavery Act 2015.

- 1 We have conducted a human trafficking and modern slavery risk assessment to inform our proportionate response to the new legislation.
- 2 We have prepared a specific policy relating to the Modern Slavery Act 2015 and published this on our website.
- 3 We are reviewing and updating our internal training programme on the subject of ethical business practices at a Global business level.
- We are enhancing our procedures for on-boarding new suppliers to obtain confirmation of a supplier's awareness of and compliance with the Modern Slavery Act 2015.

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- We are reviewing our existing supply chain applying a proportionate and risk based approach to contact relevant existing suppliers to obtain confirmation of their awareness of and compliance with the requirements of the Modern Slavery Act 2015, with an escalated procedure for medium and high risk suppliers on the basis of sector or geographical location of their operations.
- 6 We are enhancing our procedures for assessing suppliers for one-off payments.
- 7 We are reviewing our suite of contractual documents with suppliers and, where relevant and appropriate, we are introducing contractual provisions to ensure compliance with the Modern Slavery Act 2015.
- 8 We are working with recently acquired businesses to ensure that our policies and procedures are adopted and integrated into acquired businesses as soon as possible.

CONTINUING TO IMPROVE

As our approach to combatting modern slavery and human trafficking continues to develop, we will be looking for key performance indicators to allow us to monitor and measure our performance in this area.

Compliance with the Modern Slavery Act 2015 is monitored by a combination of Norrie Sinclair (Head of Risk and Ethics - EMEIA), Charlotte Woodworth (Head of Supply Chain) and Karen Sewell (EMEIA General Counsel and Head of UK Legal).

APPROVAL BY THE BOARD

The board of directors of WSP UK Limited approved this slavery and human trafficking statement for the financial year to end on 31 December 2016 at a meeting held at WSP House, 70 Chancery Lane, London WC2A 1AF on 15 December 2016.

Mark Naysmith Director and UK Managing Director

WSP UK Limited

15 December 2016

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