

Modern Slavery Act Statement



INTRODUCTION

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

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

WSP UK is part of a global business with approximately 50,000 employees across 500+ offices in 40+ countries. All operations are ultimately owned by WSP Global Inc., a Canadian company listed on the Toronto Stock Exchange.^{iv} This statement relates to WSP UK Limited and all of its subsidiaries which are operating in the UK, including WSP Management Services Limited (referred to herein as **WSP UK**).

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

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

PRACTICAL STEPS TAKEN AGAINST SLAVERY

The scope and nature of WSP UK's business model (as described above) means that WSP UK's business and supply chain is less amenable to slavery-sustaining practices than companies that operate in other sectors. Nonetheless, WSP UK continues to take practical and proportionate steps to ensure that slavery does not take place in WSP UK's business and supply chain.

Across 2019, these steps have consisted *inter alia* of:

- **Proportionate Procedures:** WSP UK has maintained proportionate procedures to identify and exclude slavery from its business and supply chain. (A number of those procedures are described below). The task of establishing and reviewing the effectiveness of those procedures has been consolidated in a newly-appointed Ethics & Compliance Officer.
- **Top-Level Commitment:** the leadership of WSP UK has signalled its commitment to excluding slavery by ensuring that the Ethics & Compliance function is adequately resourced and has autonomous reporting lines to the global board of WSP.

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- **Risk Assessment:** WSP UK has revised and updated its slavery risk assessment as its business has grown and changed. The results of that risk assessment have been used to prioritise its practical steps in identifying and excluding slavery from its business and supply chain.
- **Due Diligence:** commercial opportunities in geographic markets that present an elevated level of slavery risk are typically subject to an elevated level of scrutiny and approval at a regional and global level. This typically includes a review by the Ethics and Compliance function and, where appropriate, the imposition of additional risk mitigants to exclude slavery.
- **Client Engagement:** WSP UK has proactively engaged with major clients to understand their concerns around modern slavery, ensure that WSP UK complies with their anti-slavery contractual obligations, and to seek industry-wide solutions to industry-wide problems.
- **Employee Engagement:** More than 95% of employees in the UK have received training on WSP's global *Code of Conduct*.^v Trainings and briefings that address slavery have been delivered to key employee groups across 2019. A remotely-deliverable training/briefing on identifying slavery-sustaining practices is now under development. Further, WSP UK maintains a comprehensive HR function to ensure that its staff are employed fairly, freely and lawfully.
- **Supply Chain Engagement:** at a global level, WSP maintains a *Third Party Code of Conduct*,^{vi} with which suppliers to WSP are expected to comply. In addition, prospective suppliers to WSP UK are required to disclose the nature and status of their anti-slavery procedures before being onboarded as a supplier by WSP UK. As part of an overarching realignment of its procurement function, WSP UK is now restructuring its onboarding of suppliers to ensure that *inter alia* its anti-slavery engagement is proportionate, practical and effective.
- **Monitoring and Review:** WSP UK has monitored and reviewed the effectiveness of its anti-slavery procedures. In December 2019, its *UK Slavery and Human Trafficking Policy* was restated as its *Slavery Prevention Policy* to ensure that its procedures were practical, proportionate and clear. In addition, WSP has amended its HR, finance and expenses policies to prevent and/or restrict certain activities that bear an elevated risk of slavery.
- **Public Outreach:** WSP UK has ordered this *Modern Slavery Act Statement* and its *Slavery Prevention Policy*^{vii} to be published on www.wsp.com.
- **Identifying and Responding to Concerns:** an independent company operates a Business Conduct Hotline on WSP's behalf. WSP encourages employees, suppliers, clients and the public to report concerns ("blow the whistle") about slavery in WSP's business or its supply chain via the Business Conduct Hotline. The Business Conduct Hotline can be contacted via <https://wsp.ethicspoint.com/>

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CONTINUING TO IMPROVE

WSP UK anticipates that the practical steps described above will also be taken in 2020. In addition, we continue to be informed by the best practice and analysis of our sector, our clients, our suppliers and of anti-slavery practitioners. WSP welcomes constructive engagement with all stakeholders to increase the effectiveness of the steps described above.

APPROVAL BY THE BOARD

The board of directors of WSP UK Limited approved this statement for the financial year ending 31 December 2019 at a meeting held at WSP House, 70 Chancery Lane, London WC2A 1AF on 19 December 2019.

Mark Naysmith

Director and UK Chief Executive Officer

A handwritten signature in black ink, appearing to read 'M. Naysmith', written in a cursive style.

WSP UK Limited

19 December 2019

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

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

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

^{iv} For detailed information on WSP's workforce, activities and financial performance, see WSP's global website at www.wsp.com

^v WSP's global *Code of Conduct* can be found on WSP's website ([link](#)).

^{vi} WSP's global *Third Party Code of Conduct* can be found on WSP's website ([link](#)).

^{vii} The publicly-accessible version of the *Modern Slavery Prevention Policy* excludes certain confidential, market-sensitive and/or personal information. <https://www.wsp.com/en-GB/corporate/uk/uk-policies>