

# Modern Slavery and Human Trafficking Statement



SNC • LAVALIN



At [SNC-Lavalin](#), we are committed to preventing modern slavery and human trafficking in our operations. We are dedicated to protecting our people from any form of modern slavery and human trafficking by promoting our core values:

~~SAFETY~~

~~INTEGRITY~~

~~COLLABORATION~~

~~INNOVATION~~

# Business Overview

Founded in 1911, SNC-Lavalin is a fully integrated professional services and project management company with offices around the world. SNC-Lavalin connects people, technology and data to help shape and deliver world-leading concepts and projects, whilst offering comprehensive innovative solutions across the asset lifecycle. Our expertise is wide-ranging—consulting & advisory, intelligent networks & cybersecurity, design & engineering, procurement, project & construction management, operations & maintenance, decommissioning and sustaining capital – and delivered to clients in four strategic sectors: EDPM (Engineering, Design and Project Management), Infrastructure, Nuclear and Resources, supported by Capital. SNC-Lavalin maintains high standards for health and safety, integrity, and environmental protection. The company is committed to delivering quality projects on budget and on schedule to the complete satisfaction of its clients.





## Our strategy related to our supply chain

We recognize that our risk regarding modern slavery and human trafficking lies in our supply chains. That environment is ever-changing, as our business spans, and fluctuates over many geographies and industry sectors, and a new chain is created for each new project that we embark upon. Depending upon the requirements of each project, participants in these supply chains might include subconsultants, subcontractors, equipment and material suppliers, labor brokers, and a variety of specialized service providers. In 2019, SNC-Lavalin adopted a new [business strategy](#) to simplify, focus, and sustainably grow the business. This new approach reduces our overall risk profile by no longer bidding on lumpsum turnkey (LSTK) contracts and we reduce our modern slavery and human trafficking risks as a result of retaining fewer subcontractors, equipment and material suppliers and labor brokers. We strive, however, to be reliable partners in our clients' own efforts to fight modern slavery and human trafficking, whenever we advise them, or act on their behalf on procurement matters.

# Policies and Governance

## Code of Conduct

Our [Code of Conduct](#) sets the standards of how we work together for or on behalf of SNC-Lavalin. This important document articulates our values and includes a section dedicated to modern slavery. We aim to maintain high ethical standards in the conduct of our business. As a result, compliance with the Code of Conduct is mandatory for all personnel: it is a condition of working with us.

## Compliance

Considering that our personnel are the front-line agents in the application of our Integrity value, we have a [Compliance Procedure](#) operationalizing the principles laid out in our [Code of Conduct](#). These principles relate to anti-corruption and bribery, facilitation payments, antitrust, political contributions, gifts & hospitality, duty to report and how we deal with business partners.

## Sustainability

We put sustainability at the heart of our corporate and project activities and business strategy. In that sense, every year we commit in our [Sustainability Statement](#) to conduct business activities in a way that is beneficial to society and global and local economies. Therefore, our [Sustainable Business Strategy](#) is aligned with the [UN Sustainable Development Goals](#). We help clients to address the global, local, social and economic impacts, opportunities and risk associated with our projects.

## Suppliers

We commit to undertake business with integrity and expect our suppliers, subcontractors and consultants to respect and adhere to our values and high ethical standards of conduct. The [Supplier Code of Conduct](#) summarizes SNC-Lavalin's expectations and governing principles, including those related to human rights, modern slavery and human trafficking.

## Procurement

We strive to be competitive, yet fair and ethical in our business practice. To ensure the effectiveness of the process, the company has implemented a procurement policy that our personnel must follow. The policy communicates SNC-Lavalin's procurement principles and rules and contributes in creating and maintaining effective supply chain management capabilities, processes and systems. To ensure the transparency of the process, the company also makes all governance documents available to all employees. Relevant governance documents include the *Purchasing Management Procedure*, *Vendor Integrity Verification Procedure* and *Project Risk Identification work instruction* which set out the necessary precautions to be taken to avoid modern slavery and human trafficking.

## Human Resources

We also have human resources governance documents to protect our personnel and potential personnel from modern slavery and human trafficking. These include: [the Human Resources Policy and Workplace Discrimination, Harassment and Violence Procedure](#). In some of the company's higher risk operations, provisions have been added in our contract templates for hiring recruitment agencies, specifically addressing modern slavery and human trafficking.

# Due Diligence -

## Suppliers and other Third Parties

At SNC-Lavalin, we expect third parties we work with to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. Before making any commitments towards third parties, we take steps to appropriately evaluate the relationship and mitigate any associated risks by carrying out due diligence as may be dictated based on the risk level:

- > The 360° Integrity Check verifies if the third party is listed on international data sources, has a history of corruption, collusion, fraud or labor/human right issues, is a state-owned entity or politically exposed person, or appears on SNC-Lavalin's Reference List in order to take the appropriate mitigating measures.
  - The Vendor Integrity Verification process is an integral part of SNC-Lavalin's Integrity program. It uses multiple tools to ensure vendors are ethical through a rigorous screening and ongoing monitoring process.
  - All clients for international projects undergo an Integrity Check. If there are any findings a prior review and endorsement by an Integrity Officer is required, as well as approval up to the Sector President.
- > A uniform risk assessment of business partners performing intermediary functions between SNC-Lavalin and third parties is a company-wide requirement. Based on a set of defined risk indicators – such as the risk of corruption in the country in which the work is undertaken – a risk rating (basic, standard or enhanced) is specified for each registered transaction. The risk rating determines the subsequent action (e.g. due diligence, approval requirements and mandatory contractual clauses) taken regarding business partners.
- > Suppliers are required to accept integrity-related contractual provisions and adhere to our [Supplier Code of Conduct](#).
- > In high risk areas, we ensure our contracts with employment agencies stipulate that it is prohibited to require employees to pay recruitment fees. In addition, as part of our on-boarding process in these same areas, we verify with blue collar workers that they were not asked to pay such fees.



# Risk Assessment and Management

We undertake risk assessments to determine where our operations present a higher risk of modern slavery and human trafficking. Where we identify higher risks, we implement mitigation measures (e.g. enhanced due diligence).

Significant risk is known to reside in the use of blue-collar workers, something that is common in our industry and indeed in our own operations. The risk is compounded in the case of migrant workers. We have mapped out our use of such workers on our worksites, by country of origin (where applicable) and country of deployment, and compared that against indices such as the Global Slavery Vulnerability Score, the Global Slavery Prevalence Index and the Human Freedom Index. A number of countries have thus been identified as requiring heightened attention from our perspective, and our efforts are guided accordingly.



# Training and Awareness

Every year, SNC-Lavalin personnel at all levels are required to complete a mandatory certification process to ensure that our [Code of Conduct](#) is understood and properly applied to our daily activities.

For our blue collar and general labor workforce, we ensure awareness of our Code of Conduct and values by providing timely information by various means such as onboarding presentations, posters, and during daily meetings. Pictograms have specifically been developed to aid understanding and knowledge of the principles covered by the Code of Conduct. The modern slavery and human trafficking toolbox (which includes posters and a facilitation guide) provides our workforce with a summary of our modern slavery and human trafficking principles, giving real life examples and advising how to report any suspected or known violations.

To ensure a good understanding of the risks of modern slavery and human trafficking in our supply chains and business, we provide additional training for personnel in key positions. Our training actively explains human trafficking, how to recognize it, and proposes compliance strategies to use internally and throughout the supply chains. Every member of our board of directors has completed it as part of their onboarding. It is also available to all our employees and each manager may, at their discretion, assign it to their employees.

In addition, the company's board of directors and top executives attended an in-person presentation aimed at raising their awareness and giving them an understanding of modern slavery and human trafficking issues, given by outside counsel specializing in the topic.



My passport is being detained without my consent.

What should I do?  
**SPEAK UP!**

Modern slavery and human trafficking are strictly prohibited.

If you want to report something or need advice, talk to any one of the following:

- Your supervisor
- Your Human Resources representative
- Your security or health, safety and environment representative
- Your Integrity Officer
- Legal Affairs
- The SNC-Lavalin Reporting Line

  
**SNC-LAVALIN**

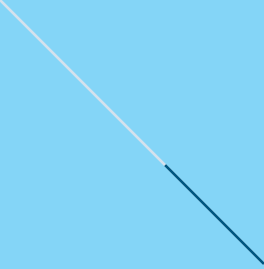


# Duty to Report

At SNC-Lavalin, all our personnel have a duty to report any known or suspected violation of our Code or any governance documents, as well as any violation of applicable laws, rules or regulations. That requirement is set out in our [Code of Conduct](#), in our [Compliance Procedure](#), as well as in our [Supplier Code of Conduct](#). The various reporting channels are set out in our [Reporting Work Instruction](#). One such channel, the [Reporting Line](#), is operated by an external service provider and is an anonymous way to report ethical and compliance concerns, including any concerns about modern slavery and human trafficking. The line is accessible not only to SNC-Lavalin personnel, but also to third parties who may potentially witness a violation by our personnel. The line is staffed by individuals speaking a variety of languages, to facilitate communication and reporting in any region of the world.

We make sure personnel and third parties are able to disclose, without fear of retaliation, concerns, complaints or allegations of known or suspected wrongdoing or misconduct and this, regardless of the local norms and culture.

Afterwards, we undertake to review all reported matters and investigate when required, within a reasonable timeframe.



# Aligning with Global Initiatives and Best Practices

In late 2015, we joined the [United Nations Global Compact \(UNGC\)](#), the world's largest corporate social initiative, with more than 9,000 business and 3,000 non-business participants in more than 160 countries. Joining the UNGC underscores our commitment to putting our extensive know-how and resources to work to meet the world's sustainability challenges. It also signals our intention to align our strategies and operations with the [UNGC's ten Principles on human rights, labor, environment and anti-corruption](#).

## Our Commitment

At SNC-Lavalin, we are committed to preventing modern slavery and human trafficking in our operations. We are dedicated to protecting our people from any form of modern slavery and human trafficking by promoting our core values: Safety, Integrity, Collaboration and Innovation.

We do not tolerate any form of forced labor, slavery or human trafficking in any part of our business. As a signatory to the UNGC, we are committed to implementing internationally recognized best practices. This includes adhering to [the sixth principle](#) that addresses working conditions and human rights.

Our [Code of Conduct](#) and [Supplier Code of Conduct](#) specifically prohibit human trafficking as well as child and forced labor. All personnel must abide by our Code. In fact, they must undergo mandatory annual certification on the Code, followed by an exam that they need to pass to continue working with us. In terms of our operations, our sustainable business strategy is aligned with the [UN Sustainable Development Goals](#). Our mission is to do business while taking into consideration the economic, social and environmental realities in different countries around the world.

# Declaration

This statement is made by SNC-Lavalin Group Inc. and covers all of its subsidiary companies. It is written for the financial year ending 31 Dec 2019 in order to meet the requirements of Section 54 of the UK Modern Slavery Act 2015.



Ian L. Edwards  
President and CEO  
Member of the board of directors



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