



SNC • LAVALIN



OUR INTEGRITY JOURNEY

JANUARY 2023

BACKGROUND INFORMATION

Following unethical activities that took place in our organization prior to 2012, we have been on a transformative journey.

Since then, we have evolved through honest reflection, hard work and a sustained commitment from all our employees, leading to the implementation of integrity best practices.

We have entirely refreshed our board and senior leadership and have worked tirelessly to achieve excellence in governance and integrity, in an effort to regain everyone's confidence.

We have also put in place a team comprised of professionals working on developing, implementing and maintaining a comprehensive Integrity Program. To ensure true independence of the Integrity function, all its members ultimately report to the Chief Integrity and ESG Officer, who in turn, reports directly to the Board of Directors and, operationally, to the General Counsel.

From crisis to industry leaders in integrity, we are proud of where we find ourselves today.

- › In 2022, we reached a remediation agreement with respect to charges laid against two of our subsidiaries for offence that would have occurred between 1997 and 2004, in connection with the Jacques Cartier Bridge Refurbishment project.
- › In 2022, we signed an administrative agreement with Public Services and Procurement Canada with regards to events concerning the Jacques Cartier Bridge Refurbishment project.
- › In 2021, the World Bank has granted SNC-Lavalin an early lifting of all sanctions previously imposed in 2013 for a period of 10 years.
- › We have entirely changed our board and senior leadership and we have worked tirelessly to achieve excellence in governance and integrity.
- › As part of the settlement of the Canadian federal charges arising from legacy activities in Libya between 2001 and 2011, SNC-Lavalin engaged an independent monitor tasked with reporting on our Integrity Program for the duration of the three-year probation order.
- › Comments and recommendations identified by the independent monitor are analyzed and assigned to one of our specialists. Plans of actions are then produced and changes to our Integrity Program implemented.

- › Since 2012, SNC-Lavalin has been cooperating actively and transparently with various authorities in the criminal investigations and prosecutions against former employees and executives.

A STRONG INTEGRITY PROGRAM

Over the years, we have demonstrated strong leadership and built a solid integrity program structure.

We have been recognized for our commitment to leading practices and for fostering a culture of integrity.

Our program is comprised of three elements under which specific tools are articulated:

- › Prevent: Fostering an ethical culture to prevent the likelihood of wrongdoing and compliance violations from occurring.
- › Detect: Providing internal controls and other means to identify and evaluate adherence.
- › Respond: Involving measures to take corrective action in response to misconduct.

For more information on our Integrity Program, consult our Integrity Highlights.

Watch our video on the Integrity program.

REDEFINING SNC-LAVALIN'S INTEGRITY GOVERNANCE AND PRACTICES



2020 – 2021 – 2022 – FOSTERING A CULTURE OF INTEGRITY

- › Revision of Gift & Hospitality procedure country treshhold in 2022
- › Counterparty Code of Conduct since 2021
- › Annual Integrity Culture Survey by Ethisphere
- › Annual Independent monitor report
- › Ethisphere Compliance Leader Verification for 2021-2024



2018 – 2019 – MOVING FORWARD AND ACCELERATING THE DEVELOPMENT OF AN INTEGRITY CULTURE

- › Creation of a dedicated AI ChatBot assisting employees with questions on Integrity matters
- › Revamp of the Business Partner tool
- › Annual Global Integrity Week and Awards



REDEFINING SNC-LAVALIN'S INTEGRITY GOVERNANCE AND PRACTICES



2015 – 2016 – 2017 – FOCUSING AND SOLIDIFYING OUR ETHICS AND COMPLIANCE PROGRAM TO ACHIEVE SUCCESS

Ethics and Compliance became to Integrity

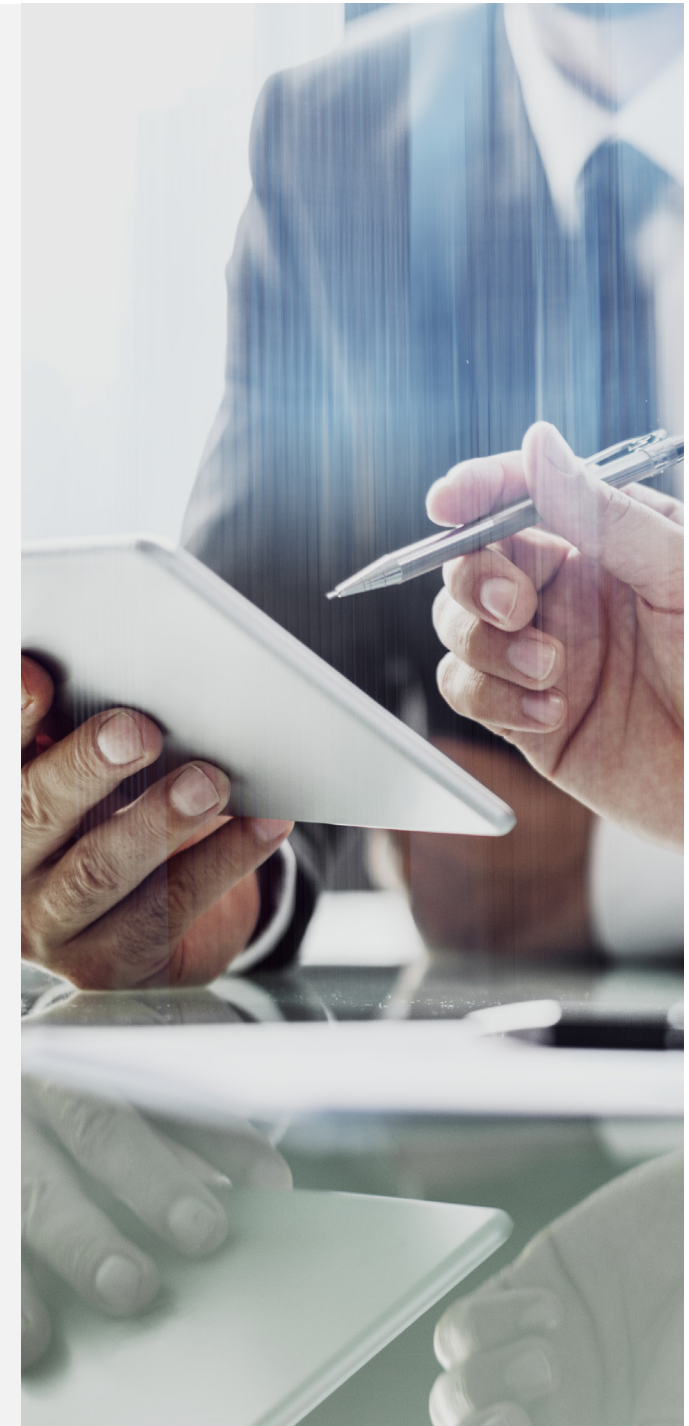
- › New Compliance procedure (replaces anticorruption policy)
- › New core values (Integrity replaces ethics)
- › Launch of our first annual Integrity Week and Awards in 2018
- › Implementation of our global Integrity Ambassador program

- › First Integrity culture survey by Ethisphere in 2016
- › First Global Modern Slavery Statement in 2016
- › Mobile app for Gifts and Hospitality scorecard created to facilitate access to the tool
- › New Supplier Code of Conduct
- › Joined United Nations Global Compact in 2015
- › Duty to report procedure deployed in 2015
- › Anti-corruption policy created in 2015



2013 – 2014 – A NEW BEGINNING WITH THE EXPANSION OF OUR CAPABILITIES

- › Ethics and Compliance is now part of Management
- › Creation of policies and governance documents (G&H, facilitation payments, business partner, political contribution)
- › Compliance organization fully ramped up
- › Changes in senior leadership and culture
- › 90-Day amnesty program



REDEFINING SNC-LAVALIN'S INTEGRITY GOVERNANCE AND PRACTICES



2012 – CRISIS

- > Documents to authorities
- > Key leadership changes
- > Investigations
- > Ethics and Compliance (E&C) Hotline
- > Employees annual training/certification on Code of Ethics



INTEGRITY IS EVERYONE'S BUSINESS

Maintaining a reputation for integrity depends on the actions of all our people. We want to become a benchmark in the industry for how to do business the right way. We've come a long way and learned a lot on our journey to ethics and compliance excellence.

We recognize that it's not enough to simply comply with laws, rules and regulations. It's also not enough to set up a framework for good governance practices. To meet the benchmark we set for ourselves, it's essential that integrity is woven into the very fabric of our organization. Our goal is to set a higher standard and go beyond typical compliance levels.

Our commitment to integrity has earned us the prestigious Compliance Leader Verification from the Ethisphere Institute, an independent centre for research, best practices and thought leadership.

Ethisphere conducted a thorough assessment of our Integrity Program and benchmarked, it against its World's Most Ethical Companies data set, providing insight into the programs and practices of leading companies around the world.

Outreach efforts

We believe it is worth sharing our transformative journey so others can learn from our experience. We take part in public speaking opportunities worldwide as experts on compliance and ethics at universities, associations and ethics-based organizations, including:

- › Ethisphere
- › Organisation for Economic Co-operation and Development (OECD)
- › Transparency International
- › TRACE International

- › The International Bar Association
- › Alliance for Integrity
- › The Conference Board of Canada
- › Society for Corporate Compliance and Ethics (SCCE)

Finally, we continue to support global anti-corruption efforts such as:

- › World Economic Forum's Partnering Against Corruption Initiative (PACI)
- › United Nations Global Compact
- › OECD Trust in Business Integrity Initiative
- › TRACE International
- › Business Ethics Leadership Alliance (BELA)
- › Coalition for Ethical Operations

For more information

- › [Integrity page](#)
- › [Integrity Highlights](#)
- › [Sustainability report](#)

Learn more about our program with these videos

- › [Our Integrity Program](#)
- › [Gifts & Hospitality](#)
- › [Speak Up!](#)
- › [Supplier Code of Conduct](#)

