



Modern Slavery And Human Trafficking Statement

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At AtkinsRéalis, we will not knowingly be complicit of human rights abuses. We work towards preventing forced labor, child labor, modern slavery and human trafficking, including in our supply chain, and protecting individuals working directly or indirectly for AtkinsRéalis from any form of forced labor, child labor, modern slavery and human trafficking.

This statement relates to the financial year of Group SNC-Lavalin Inc., doing business under the name AtkinsRéalis ("AtkinsRéalis"), which ended on December 31, 2023, and is made in accordance with Section 11(4)(b) (ii) of the *Fighting Against Forced Labor and Child Labor in Supply Chains Act* (Canada) and Section 54 of the *Modern Slavery Act 2015* (UK).



1. Structure, Operations and Supply Chain

a) Structure and Operations

AtkinsRéalis is a world-leading design, engineering and project management organization. We connect people, data and technology which enables us to transform the world's infrastructure and energy systems. Together, with our industry partners and clients, our global team of consultants, designers, engineers and project managers, we can change the world.

Our corporate purpose and values drive how we deliver value to clients, how we manage resources, and how we innovate. We are proud of our inclusive, diverse and energized approach and we share an open culture founded on our values: safety, integrity, innovation, collaboration, and excellence.

Markets

From designing entire cities to delivering nuclear power stations and transforming manufacturing systems, we focus our business in the areas that have the most impact on the way we all live and the resources we demand from the planet.



Transportation

- Rail & Transit
- Roads
- Aviation
- Ports



Nuclear

- New Build
- Reactor Support & Life Extension
- Environmental Remediation



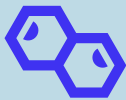
Buildings & Places

- Cities & Communities
- Social
- Commercial
- Residential Property



Water

- Water and Wastewater Utilities - Treatment & Resources
- Environment Protection, Regulation & Resilience



Minerals & Metals

- Minerals
- Metals



Defense

- Aerospace
- Defense
- Security



Industrial

- Life Sciences / Pharma
- Advanced / Hi-Tech Manufacturing
- General Manufacturing

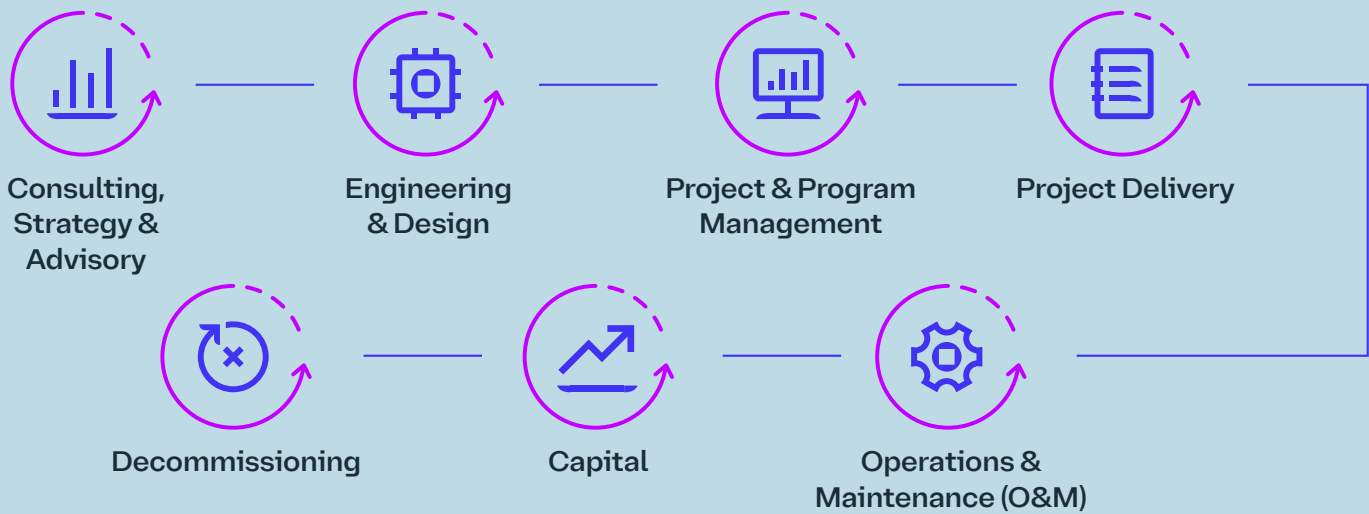


Power & Renewables

- Power Grids
- Hydropower & Dams
- Alternative Energies & Technologies

Services

Our commitment to a whole-life view of major development programmes enables us to lead projects at every stage and ensure that, wherever we are involved, our people have a wider view of the challenge to better guide our clients and partners.



b) Supply Chain

We recognize that there are risks regarding forced labor, child labor, modern slavery and human trafficking in our supply chain. That environment is ever-changing, as our business operates in many regions and industries. Depending on each project's requirements, participants in the supply chain might include subcontractors, equipment and material suppliers, labor brokers, recruitment agencies and a variety of specialized service providers.

c) Supplier Management System

AtkinsRéalis is implementing the Vendor Management System (VMS). The VMS will improve the visibility we have on our supply chain, standardize supplier vetting, enhance due diligence and provide consistency during the on-boarding phase.

2. Risks

a) Integrity Risk Assessments

The Integrity Risk Assessment (IRA) is designed to help us better understand risks that our business operations may face. The objective is to:

- Produce focused and actionable information when defining risk;
- Determine related remedial action within the organization; and
- Enable the senior leadership to periodically verify the progress of remedial actions.

We determine the countries of focus by using key risk indicators, including personnel headcount, Transparency International Corruption Perception Index, FCPA/UKBA Enforcement actions, revenue per country, Global Slavery Index and number of craft laborers.

In these selected countries, we distribute a risk survey to key managers covering bribery and corruption, modern slavery, antitrust, lobbying and data compliance. The findings are then summarized and discussed with operational and senior leadership. We conduct IRAs every 18 months, to address new risks.

b) Craft Labor Workers

We acknowledge the risks faced by craft and general labor workers, particularly migrant workers. Migrant workers are more vulnerable to forced labor and often lacking access to information and facing language barriers. Consequently, we provide multilingual documentation and reporting channels and conduct regular on-site visits.

c) Recruitment Process

We recognize that the recruitment process, including the use of recruitment or placement agencies, can pose risks related to forced labor. We engage and collaborate with our recruitment and placement agencies so that no fees are charged, no costs are incurred by candidates, no documents are withheld and all applicable laws and industry standards on employee wages, working hours and minimum age are adhered to.

3. Actions

a) Policies and Procedures

To ensure the transparency of the process, AtkinsRéalis makes all governance documents available to employees and main integrity related governance documents available to the public.

Code of Conduct

Our [Code of Conduct](#) articulates our values and includes a section dedicated to modern slavery. It sets the standards of how we work and conduct ourselves with unwavering integrity in everything we do. Compliance with the Code of Conduct is mandatory for all personnel.

Human Rights Policy

Our [Human Rights Policy](#) outlines our expectations and guidelines including the prohibition of all forms of modern slavery, forced labor and child labor. We allow personnel to end, with appropriate notice, their employment, ensure employees maintain free access to their legal documents, cover recruitment and placement costs, prohibits compulsory and abusive overtime practices, ensure timely wage payments and respect the freedom of association and personnel representation.

Compliance Procedure

Our personnel are the frontline enforcer of our Integrity value. We have a [Compliance Procedure](#) applying the principles laid out in our Code of Conduct to our operations covering corruption, bribery, business partners and suppliers, gifts and hospitality, facilitation payments, antitrust and competition, political contributions, money laundering, tax evasion, and duty to report.

Suppliers and Counterparties

We conduct business with integrity and expect our suppliers, subcontractors, and consultants to uphold our values and ethical standards. The [Supplier Code of Conduct](#) and the [Counterparty Code of Conduct](#) outline our expectations and governing principles, including those related to human rights, modern slavery and human trafficking, which our partners are required to accept and follow.

Human Resources

Our human resources governance documents promote the protection of our personnel and candidates against modern slavery and human trafficking and foster equality, diversity and inclusion. These include: the Human Resources Policy, [Work-related Discrimination, Harassment and Violence Procedure](#) and Equality, Diversity and Inclusion Policy

b) Due Diligence

At AtkinsRéalis, we expect third parties share our values, act with integrity and comply with all applicable laws and regulations. Before making any commitments to third parties, we conduct risk-based due diligence and checks:

- Our Integrity Checks verify if a third party is listed on watch lists (including denied and sanctions lists). We also review the history of corruption, collusion, fraud or labor/human right violations or related issues through adverse media and publicly available information research, whether it is a state-owned entity/politically exposed people, or appears on our Reference List before we decide whether to proceed with engaging them.
- Suppliers are screened rigorously using various tools and databases and ongoing monitoring.
- Clients for international projects undergo an integrity check.

- Business partners performing intermediary functions on our behalf are also assessed. Based on defined risk indicators – such as the risk of corruption in the country in which the work is undertaken – a risk rating is specified for each transaction. The risk rating determines the subsequent action (e.g., due diligence, approval requirements and mandatory contractual clauses) taken regarding business partners.
- Counterparties/Suppliers are required to accept integrity-related contractual provisions and adhere to our Counterparty/Supplier Code of Conduct.

c) Duty to Report

At AtkinsRéalis, all our personnel, suppliers and counterparties have a duty to report any known or suspected violation of our Code of Conduct or any governance documents, as well as any violation of applicable laws, rules or regulations. These requirements are set out in our Code of Conduct, Compliance Procedure and Supplier Code of Conduct.

We provide an independent, confidential, and anonymous reporting through an [external service provider](#).

This channel allows AtkinsRéalis personnel and third parties to report ethical and compliance concerns, including those related to forced labor, child labor, modern slavery and human trafficking. The line is staffed by multilingual individuals to support reporting from anywhere in the world.

We ensure that our personnel can report concerns or allegations of wrongdoing, without fear of retaliation, regardless of the local norms and culture. We review all reported matters and investigate when required, within a reasonable timeframe.

4. Training and Awareness

a) Training

Each year, AtkinsRéalis personnel at all levels complete a mandatory certification to ensure the understanding and application of our Code of Conduct.

For our craft and general labor workforce, we provide information through onboarding presentations, posters and specially designed pictograms. The modern slavery and human trafficking toolbox (which includes posters and a facilitation guide) offers a summary of our modern slavery and human trafficking principles. It gives real-life examples and advice on how to report any suspected or known violations.

To enhance awareness, key personnel receive additional training on the identification of the modern slavery and human trafficking risks in our supply chain and business. The training is available to all employees and managers have the discretion to assign it to their respective teams.

b) Awareness

In the context of the World Day Against Trafficking in Persons, AtkinsRéalis rolled out, in August 2023, an interactive awareness module to spot the signs of potential modern slavery and give practical tips as to what to do if you encounter potential modern slavery.

5. Global Initiatives and Best Practices

a) UN Global Compact

AtkinsRéalis has been a signatory of the UN Global Compact since 2015, which means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labor, environment and anti-corruption.

b) Stakeholders Engagement

AtkinsRéalis is a member of the Modern Slavery Council of the Business Services Association. Located in the UK, the aim of the Modern Slavery Council is to create and maintain an industry focus on modern day slavery, specifically from a procurement and supply chain perspective and to tackle modern day slavery in the UK operations and supply chains of its members.



6. Effectiveness

Monitoring the effectiveness of our actions is a key element to mitigate the risk of forced labor, child labor, modern slavery and human trafficking. We believe in spreading the message, setting the tone and ensuring that any suspected act of forced labor, child labor, modern slavery and human trafficking is dealt with accordingly.

We review all reported matters and investigate when required, within a reasonable timeframe, track and ensure the completion of our employees' mandatory training sessions and audit processes to flag, identify and address potential weaknesses or risks.

Compliance Control Framework

AtkinsRéalis uses its Compliance Control Framework (CCF) to test and monitor the internal controls within its Integrity Program. Led by our Integrity Investigations team, the CFF assesses key controls to determine the effective implementation of the Integrity Program. This assessment covers the design (i.e. whether the control mitigates the compliance risk identified) and its operating effectiveness (i.e. whether the control operates as planned). Control procedures are tested on a sample basis, following the methodology of our Internal Audit department, with sample sizes determined based on control frequency.

7. Our Commitment

At AtkinsRéalis, we will not knowingly be complicit of human rights abuses. We work towards preventing forced labor, child labor, modern slavery and human trafficking, including in our supply chain, and protecting individuals working directly or indirectly for AtkinsRéalis from any form of forced labor, child labor, modern slavery and human trafficking.

8. Approval

This statement applies to AtkinsRéalis and all its subsidiaries. It has been approved by the Board of Directors of AtkinsRéalis and is hereby signed by AtkinsRéalis' President and Chief Executive Officer and member of its Board of Directors.

In accordance with the requirements of the *Fighting Against Forced Labor and Child Labor in Supply Chains Act* (Canada), the following entities are covered by the report:

SNC-Lavalin Group Inc.

AtkinsRéalis Canada Inc.

AtkinsRéalis Operations
& Maintenance Inc.

AtkinsRéalis Major Projects Inc.

Candu Energy Inc.

SNC-Lavalin Nuclear Inc.

Protrans BC Operations Ltd.

In accordance with the requirements of the *Fighting Against Forced Labor and Child Labor in Supply Chains Act* (Canada), and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



IAN L. EDWARDS,

President and CEO,
and on behalf of the Board
of Directors

I have the authority
to bind AtkinsRéalis

March 1, 2024

