

Policy

HUMAN RIGHTS

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Purpose

The purpose of this **policy** is to provide **AtkinsRéalis**' expectations and guidelines with respect to **human rights**, labour standards and anti-**corruption**.

Revision Index

Version	Issuance Date	Revision Details
01	2023-01-11	Initial version
1.1	2023-11-30	Issuance in a new template and document number
1.2	2024-01-12	Updated document number
1.3	2024-06-14	Updated hyperlinks due to the change of AtkinsRéalis' domain.
1.4	2025-03-28	Modification to the section role and responsibilities and title of the Governance Owner

1. Scope

The **scope** of this **policy** is defined in the **Global Glossary**.

2. Audience

This policy applies to all AtkinsRéalis personnel.

3. Definitions

All terms in **bold and italics** are defined in the Global Glossary.

4. Human Rights

4.1 International standards

We support and respect the protection of internationally recognized human rights.

- As a signatory of the <u>UN Global Compact</u> since 2015, **AtkinsRéalis** is committed to carrying out business in compliance with the:
 - Universal Declaration of Human Rights;
 - Ten Principles of the United Nation Global Compact;
 - International Labour Organization's Declaration on Fundamental Principles and Rights at Work;
 - UN Guiding Principles on Business and Human Rights
- Guided by the Constitution of Canada, the <u>United Nations Declaration on the Rights of Indigenous Peoples</u> and the recommendations of Canada's Truth and Reconciliation Commission, *AtkinsRéalis* is committed to establish and maintain mutually respectful and meaningful relationships between Indigenous communities, our *clients* and our *company*. For additional guidance, refer to our <u>Commitment to Indigenous Peoples</u>.

4.2 Human rights abuses

We will not be knowingly complicit of human rights abuses.

- AtkinsRéalis personnel must not knowingly commit, participate, provide assistance or encouragement to, human rights violations.
- When local laws allow behaviour that is not permitted by our <u>Code of Conduct</u> or *governance documents*, our <u>Code of Conduct</u> and *governance documents* prevail.
- AtkinsRéalis personnel must disclose any concerns, complaints or allegations of known or suspected
 wrongdoing or misconduct, including suspected human rights abuses. For additional guidance, refer to Reporting
 Work Instruction.
- No reporter shall suffer *retaliation* or adverse employment consequences, when coming forward in good faith with their concerns. Any *retaliation* made against a reporter is a *material breach* and may lead to disciplinary actions up to and including employment termination.



5. Labour Rights

5.1 Freedom of association

We uphold the freedom of association and the effective recognition of the right to collective bargaining, where local laws permit.

- AtkinsRéalis respects the freedom of association.
- AtkinsRéalis respects the right to worker representation.

5.2 Forced labour

We work towards the elimination of all forms of modern slavery and forced labour.

- AtkinsRéalis prohibits all forms of modern slavery and forced labour (including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any forms of human trafficking).
- AtkinsRéalis permits workers to end, with appropriate notice, their employment.
- AtkinsRéalis ensures workers maintain free access to their passports, identity papers, work permits, travel
 documents and other personal legal documents.
- AtkinsRéalis bears the full cost of recruitment and placement.
- AtkinsRéalis prohibits compulsory and abusive overtime practices.
- AtkinsRéalis pays wages regularly, directly and on time.

For additional guidance, refer to the **Human Resources** Policy.

5.3 Child labour

We work towards the effective abolition of *child labour*:

AtkinsRéalis prohibits child labour in any form.

5.4 Discrimination

We work towards the elimination of discrimination in respect of employment.

- AtkinsRéalis personnel must be treated and are expected to treat everyone with respect and dignity and must
 not be subjected or subject anyone to bullying, intimidation, violence, corporal punishment or physical, sexual,
 psychological, and verbal harassment or abuse.
- AtkinsRéalis prohibits discrimination based on beliefs, national or ethnic origin, culture, religion, political
 convictions, age, mental or physical disability, sex, sexual orientation, gender identity, partnership status,
 pregnancy, maternity, or any other grounds prohibited by laws.

For additional guidance, refer to the Work Related Discrimination, Harassment and Violence Procedure.



6. Anti-Corruption

6.1 Bribery and corruption

We work against *corruption* in all its forms, including extortion and *bribery*.

- AtkinsRéalis prohibits corruption and bribery in all their forms.
- AtkinsRéalis personnel must never accept, request, offer, promise, give or authorize a bribe, kickback, payment
 or anything that can be considered as such (gifts, entertainment, employment, contracts or benefits of any kind)
 to or from any third party with the intent to obtain an improper or unfair advantage, retain business or influence
 that third party's actions.

For additional guidance, refer to the Code of Conduct and Compliance Procedure.

7. Counterparties

AtkinsRéalis promotes integrity and the highest ethical standards in all aspects of its business and wants to work with **counterparties** who share its values. **AtkinsRéalis** must not knowingly do business with **counterparties** who do not adhere to the principles put forward in this **policy**, regardless of local legislation and customs. For additional guidance, refer to the **Counterparty Code of Conduct**.

8. Role and responsibilities

8.1 AtkinsRéalis personnel

All AtkinsRéalis personnel must:

- Familiarise themselves and act in accordance with this *policy*.
- Engage with their colleagues to create an inclusive workplace and ensure psychological safety.
- Proactively challenge inappropriate behaviour and report breaches of this policy.

8.2 Managers

All managers must:

- Ensure that the decisions they make affecting employment, training, promotion, reward and career development are based only on an individual's skills, talents and ability.
- Ensure that AtkinsRéalis personnel are familiar with this policy and aware of their responsibilities.
- Proactively address any inappropriate behaviour.

9. Exceptions and deviations

To request an exception or *deviation* from this *policy*, please consult the <u>Deviation Process</u> Work Instruction and use the <u>Deviation Tool</u>.



10. Guidance

For questions or further information with respect to this *policy*, please contact the Regulatory Compliance Manager.

Related documents & regulations			
Commitment to Indigenous Peoples			
Code of Conduct			
Counterparty Code of Conduct			
Human Resources Policy			
Compliance Procedure			
Work Related Discrimination, Harassment and Violence Procedure			
Discipline and Performance Management Procedure			
Reporting Work Instruction			
Universal Declaration of Human Rights			
Ten Principles of the United Nation Global Compact			
International Labour Organization's Declaration on Fundamental Principles and Rights at Work			
UN Guiding Principles on Business and Human Rights			
United Nations Declaration on the Rights of Indigenous Peoples			

