



**SNC • LAVALIN**

# Modern Slavery and Human Trafficking Statement

*This statement relates to the financial year ending December 31, 2018 and is made by SNC-Lavalin Group Inc. and its relevant subsidiaries, in compliance with the UK Modern Slavery Act 2015.*

At SNC-Lavalin, we do all we can to prevent modern slavery and human trafficking. We are dedicated to protecting every individual working directly or indirectly for SNC-Lavalin from any form of modern slavery and human trafficking by promoting their wellness throughout our core values: Safety, Integrity, Collaboration and Innovation.

## About SNC-Lavalin

Founded in 1911, SNC-Lavalin is a global fully integrated professional services and project management company and a major player in the ownership of infrastructure. From offices around the world, SNC-Lavalin's more than 50,000 employees think beyond engineering. Our teams provide comprehensive end-to-end project solutions – including capital investment, consulting, design, engineering, construction management, sustaining capital and operations and maintenance – to clients across the EDPM (engineering, design and project management), Infrastructure, Nuclear, and Resources businesses.

## Code of Conduct

SNC-Lavalin's [Code of Conduct](#), which applies to all employees, sets the highest expectations for integrity in our business dealings across all our divisions, sectors, business units, regions and subsidiaries.

As a signatory of the United Nations Global Compact, SNC-Lavalin continues to incorporate in its strategies, policies and procedures the [Ten Principles](#) which focus on human rights, labor, environment and anti-corruption. While human rights have been a topic covered by our Code for many years, a link to our Modern Slavery and Human Trafficking statement has been added in the most recent version to reinforce our engagement.

## Suppliers and Other Third Parties

SNC-Lavalin expects its third parties to adhere to similar business principles and values in addition to complying with all applicable laws and regulations. Before making any commitments to third parties, we take steps to appropriately evaluate the relationship and mitigate any associated risks.

- > We carry out due diligence on all third parties, including clients, suppliers and business partners. This review ranges from an integrity check screening to enhanced due diligence, depending on the risk level.
- > Suppliers are required to accept integrity related contractual provisions and adhere to our [Supplier Code of Conduct](#). This document summarizes SNC-Lavalin's expectations and governing principles, including those related to human rights and modern slavery. Any breach of these commitments can lead to contract termination.
- > In high risk areas, we ensure that our contracts with employment agencies stipulate that it is prohibited for them to require employees to pay recruitment fees. In addition, as part of our on-boarding process in these same areas, we verify with craft workers that they did not have to pay such fees.
- > 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.

## Training and Awareness

Every year, SNC-Lavalin employees at all levels are required to complete a certification process to ensure that our Code of Conduct is understood and properly applied to our daily activities.

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 employees in key positions. This training explains what human trafficking is and how to recognize it, and proposes compliance strategies to use internally and throughout the supply chains. While available to all employees, this training is mandatory for the entire senior management team, as well as managers and professional staff in the Human Resources, Legal, and Integrity teams.

## Duty to Report

Everyone at SNC-Lavalin has a duty to report any known or suspected violations of our Code and its underlying policies, as well as any violation of applicable laws, rules or regulations. This includes any concerns about modern slavery and human trafficking. [Our reporting line](#) is an anonymous way to report ethical and compliance concerns. It's operated by an external service provider. Employees and third parties anywhere in the world must disclose in good faith, concerns, complaints or allegations of known or suspected wrongdoing or misconduct, and are entitled to do so without fear of retaliation.

SNC-Lavalin undertakes to review all reported matters and investigate when required, within a reasonable time frame. In the past year, there have been no issues raised internally or externally concerning modern slavery.

## Looking Ahead

The battle to eliminate modern slavery is ongoing and details of the actions taken in 2018 can be found in our Sustainability Report. SNC-Lavalin is committed to continuously improving its practices to combat modern slavery and human trafficking.

This statement has been approved by the Board of Directors and signed by our interim President and Chief Executive Officer who is responsible for implementing and monitoring this Policy and all employees and persons working on our behalf have the duty to share our commitments and everyone is empowered to speak up and act to ensure that they are met.



### Ian L. Edwards

Interim President and Chief Executive Officer

July 25, 2019