

STANTEC UK TAX STRATEGY

SCOPE

Stantec Inc and its subsidiaries ("Stantec") regards this publication as complying with the duty required in accordance with Paragraph 19(2) and 22(2) of Schedule 19 to Finance Act 2016. Stantec is publishing its tax strategy for the year ending 31 December 2019. As the ultimate parent company of the UK subsidiaries, we confirm that this strategy will apply to all UK subsidiaries and will be periodically reviewed and updated accordingly.

GOVERNANCE IN RELATION TO TAX

The strategy is set by the respective boards of directors for each of the UK subsidiaries in consultation with the UK & global tax teams and global leadership. The Finance Directors ("FDs") of each of the respective entities are responsible for tax matters within established corporate guidelines and policies. Day to day management of the UK tax affairs are delegated to the UK Senior Tax Manager who reports to the FDs and Global Tax Director in Edmonton, Canada. Working in partnership, the directors and employees mentioned above ensure Stantec's tax strategy is considered in all investments and significant business decisions.

RISK MANAGEMENT

Stantec mitigates its tax risks through the implementation of the following strategies:

- Implement a system of tax risk assessment and controls as a component of the overall internal control framework;
- Establish and document sound corporate policies and procedures (including the anti-tax evasion policy);
- Ensure reasonable care is applied in relation to all processes which could materially affect its compliance with tax legislation;
- Maintain a tax risk register and perform regular tests of the tax controls in place. The key risks are monitored for business, economic and legislative changes, with changes to controls being made as required;
- Invest in staff training;
- Seek advice from our external advisors where appropriate.

LEVEL OF RISK THAT STANTEC IS PREPARED TO ACCEPT IN RELATION TO UK TAX

In line with our core business value "We do what is right", Stantec maintains a conservative approach to tax that allows for the minimisation of tax costs through the implementation of tax relief and incentive strategies which are consistent with UK, Canadian, US and international tax laws. We will only implement strategies that are supported by applicable legislation, our auditors and tax advisors.

ATTITUDE TO TAX PLANNING

It is vital that all areas of our businesses feel supported from a tax point of view to enable Stantec to achieve its commercial objectives. This includes both managing tax risk and making good investment decisions as appropriate with knowledge of all tax costs. Even when decisions are made which are in line with the strategy, risk can arise through poor implementation and



execution of transactions, ineffective ongoing management business processes or other means. The UK tax department, alongside the global tax team therefore aim to be involved in all stages of material and tax sensitive transactions from scoping through to post implementation reviews. Tax support will always be given in the context of tax being an 'enabler' with tax risk being highlighted by reference to risk appetite, materiality of amounts and obligations in question.

Stantec places primary importance on paying the correct amount of tax at the right time, under all relevant laws and regulations and to fully comply with its regulatory and non-regulatory obligations. We do not undertake aggressive tax planning strategies and we strive to act in a manner that upholds our reputation as a responsible corporate citizen and to operate with integrity and transparency. The tax control framework noted above enables Stantec to effectively manage its tax liabilities and obligations.

APPROACH TOWARDS DEALINGS WITH HMRC

Stantec has a strong, ongoing relationship with HMRC, by maintaining an open, honest and timely dialogue through regular meetings and communications in respect of developments in Stantec's business and tax risks, past, present and future. Stantec ensures that HMRC is aware of any significant transactions or changes to the business and seeks to discuss tax issues arising at an early stage. Stantec doesn't have a history of implementing transactions where the tax treatment has potential to be uncertain. In the event of such a transaction arising, Stantec would engage with HMRC at an early stage and disclose all relevant facts and figures in its tax computations.

Stantec acknowledges and understands the responsibility and obligation that it has as a large group of companies within the United Kingdom to work alongside HMRC and other regulatory bodies to ensure that our tax affairs are correct, appropriate and transparent.