

Human Trafficking and Modern Slavery Policy

May 11, 2016

Last Reviewed: May 9, 2019

Policy

Trafficking in persons and slavery for the purposes of exploitation is a serious crime and a gross violation of human rights.

Stantec conducts its business in such a manner so as to support and implement a zero tolerance policy regarding trafficking in persons and modern slavery.

Practice

At a minimum, Stantec and its employees shall not (1) engage in Severe Forms of Trafficking in Persons; (2) procure Commercial Sex Acts; or (3) engage in any act of Modern Slavery.

If an employee violates this Policy, they will be subject to appropriate discipline, including but not limited to removal from the project, reduction in benefits, or termination of employment with or without cause.

Any suspected violation of this Policy by a Stantec employee or subcontractor acting on behalf of Stantec, shall be reported to Stantec's [Integrity Hotline](#).

Additional information on this topic is available at the following website:

http://www.dhs.gov/xlibrary/training/dhs_awareness_training_fy12/launchPage.htm

Definitions

The following words, phrases, or terms shall have the indicated meanings when used in this Policy:

- "Stantec" means Stantec Inc. or any of its wholly owned subsidiaries.
- "Commercial Sex Act" means any sex act on account of which anything of value is given to or received by any person.
- "Modern Slavery" means (a) holding a person in slavery or servitude, or (b) requiring a person to perform forced or compulsory labor.
- "Severe Forms of Trafficking in Persons" means (a) sex trafficking in which a commercial sex act is induced by force, fraud or coercion, or in which the person induced to perform such act is under 18 years of age; or (b) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.
- "Sex trafficking" means the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act.