

Political Contributions and Lobbying Policy

May 1, 2017

Policy

Stantec will not make political contributions and will not contribute funds to any political action committee (PAC) or similar organization. Any exception must be approved in writing by the chief operating officer (or the highest company officer in the respective country if the local laws require decisions by a national citizen) and cc'd to the General Counsel. No exceptions will be approved for contribution requests in excess of \$5,000. This policy in no way restricts Company or employee support of and membership in professional or trade organizations or, to the extent not otherwise prohibited by law, from holding political office or personally making political donations.

Employees must consult Stantec's in-house legal counsel before engaging in lobbying or political activities.

Political Contributions Practice

Many jurisdictions limit or prohibit political contributions by corporations or participation in the political process by corporations. Stantec wishes to avoid the appearance of any attempt to obtain or retain business or to secure an improper advantage with public officials, political candidates, or political parties.

Political contributions are broadly defined in this policy to include anything of value given in support of candidates, political committees, political parties, ballot initiatives, referenda, measures, or other similar political organizations or campaigns. Examples include:

- Money
- Purchase of tickets to an event (such as a luncheon, reception, dinner, or fundraiser)
- Use of corporate facilities, equipment, or personnel
- Placement of advertisements in journals
- Payment for services and/or goods

Political contributions or activities by employees in their private, non-Stantec capacity are permissible, and Stantec supports the right of each employee to support candidates and causes of their own choosing, subject to applicable law. Stantec will not directly or indirectly reimburse or otherwise compensate employees for their individual contributions. Employees are expected to avoid any investment, interest, or association that interferes or appears to interfere with the exercise of independent judgment or which could pose a conflict of interest under Stantec policies. Employees are prohibited from engaging in any overt, visible, and partisan political activity in which the employee's actions could be perceived as an institutional political representation by Stantec. Stantec employees may not use their Stantec position or authority to coerce or pressure other employees to make political contributions or to support or oppose political candidates or organizations, or to seek to reimburse or compensate other employees for political contributions. Employees engaging in political campaign activities should do so as



private citizens in their non-Stantec capacity. They should also refrain from engaging in such activities during work hours and should always refrain from using Stantec resources in respect to political activities.

Lobbying Practice

Lobbying is regulated in many of the countries in which Stantec operates. Lobbying in some jurisdictions may be defined broadly to include meeting with government officials for the purpose of promoting the company. Many local statutes require such political interactions and any associated expenses to be reported regularly and in a prescribed manner. In some jurisdictions, advance lobbying registration and/or reporting requirements may be a prerequisite for any Stantec employee engaging in lobbying activity, possibly including Stantec sales and marketing employees who interact with public officials. Accordingly, it is critical that all Stantec employees inform themselves of local rules/restrictions respecting interactions with public officials in advance of any such activities by reaching out to Stantec's in-house lawyers.

High ethical standards are the responsibility of every Stantec employee. Failure of an employee to follow this policy will result in disciplinary action up to and including termination of employment.