



Corporate Responsibility to Respect Human Rights

This Statement explains the steps taken by Stantec to comply with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*. This Statement follows the format of the submittal made to the Minister of Public Safety.

Identifying information

Questions marked with an asterisk (*) are mandatory.

1. *This report is for which of the following? (Required)

- Entity
- Government institution

2. *Legal name of reporting entity or government institution (Required)

Stantec Inc.

3. *Reporting year (Required)

May 31, 2025

4. *Financial year covered by report (Required)

2024

5. *Is this a revised version of a report already submitted this reporting year? (Required)

- Yes
- No

5.1 *If yes, identify the date the original report was submitted. (Required)

Not Applicable

5.2 *Describe the changes made to the original report, including by listing the questions or sections that were revised (3,000 character limit). (Required)

Not Applicable

6. For entities only: Business number(s) (if applicable):

Corporation Number: 301878-4
Business Number: 13052 1958 RC 0001

7. For entities only: *Is this a joint report? (Required)

- Yes
- No

7.1 *If yes, identify the legal name of each entity covered by this report. (Required)

Not Applicable

7.2 Identify the business number(s) of each entity covered by this report (if applicable).

Not Applicable

8. For entities only: *Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction? (Required)

- Yes
- No

**8.1 *If yes, indicate the applicable law(s).
Select all that apply. (Required)**

- The United Kingdom's *Modern Slavery Act 2015*
- Australia's *Modern Slavery Act 2018*
- California's *Transparency in Supply Chains Act*
- Germany's *Act on Corporate Due Diligence Obligations in Supply Chains*
- France's *Duty of Vigilance Act*
- Norway's *Transparency Act*

9. For entities only: *Which of the following categorizations applies to the entity? Select all that apply. (Required)

- Listed on a stock exchange in Canada
- Canadian business presence (select all that apply):
 - Has a place of business in Canada
 - Does business in Canada
 - Has assets in Canada
- Meets size-related thresholds (select all that apply):
 - Has at least \$20 million in assets for at least one of its two most recent financial years
 - Has generated at least \$40 million in revenue for at least one of its two most recent financial years
 - Employs an average of at least 250 employees for at least one of its two most recent financial years

10. For entities only: *Which of the following sectors or industries does the entity operate in? Select all that apply. (Required)

- Agriculture, forestry, fishing and hunting
- Mining, quarrying, and oil and gas extraction
- Utilities
- Construction

- Manufacturing
- Wholesale trade
- Retail trade
- Transportation and warehousing
- Information and cultural industries
- Finance and insurance
- Real estate and rental and leasing
- Professional, scientific and technical services
- Management of companies and enterprises
- Administrative and support, waste management and remediation services
- Educational services
- Health care and social assistance
- Arts, entertainment and recreation
- Accommodation and food services
- Other services (except public administration)
- Public administration
- Other, please specify:

11. For entities only: *In which country is the entity headquartered or principally located? (Required)

Canada

11.1 If in Canada: *In which province or territory is the entity headquartered or principally located? (Required)

Alberta

Annual Report

Reporting for entities

1. *Which of the following accurately describes the entity's structure? (Required)

- Corporation
- Trust
- Partnership
- Other unincorporated organization

2. *Which of the following accurately describes the entity's activities? Select all that apply. (Required)

- Producing goods (including manufacturing, extracting, growing and processing)
 - in Canada
 - outside Canada
- Importing into Canada goods produced outside Canada
- Controlling an entity engaged in producing goods in Canada or outside Canada
- Controlling an entity engaged in importing into Canada goods produced outside Canada

3. *What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply. (Required)

- Mapping activities
- Mapping supply chains
- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Developing and implementing an action plan for addressing forced labour and/or child labour
- Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily
- Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains

- Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour
- Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains
- Developing and implementing child protection policies and processes
- Developing and implementing anti-forced labour and/or -child labour contractual clauses
- Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists
- Auditing suppliers
- Monitoring suppliers
- Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour
- Developing and implementing grievance mechanisms
- Developing and implementing training and awareness materials on forced labour and/or child labour
- Developing and implementing procedures to track effectiveness in addressing forced labour and/or child labour
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour
- Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour
- Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks
- Information not available for this reporting period

4. Please provide additional information describing the steps taken (if applicable) (3,000 character limit).

Stantec is a professional service firm that provides architectural, engineering, planning, and scientific services. Stantec does not maintain manufacturing operations nor are we a

Stantec Inc.

significant importer of goods in any country in which we operate.

Our need to comply with this law is based on ownership of a native plant nursery in Indiana, United States, where we grow and sell native plants, seeds, and seed mixes for use in ecosystem restoration projects (wetland, prairie, and woodland restoration). Less than 1% of Stantec's revenue is derived from the nursery. Our responses to questions 2, 3, 6, 7, and 8 of the Annual Report section of this questionnaire are based on the activities of the plant nursery. All other responses in this questionnaire are based on Stantec's company-wide activities.

To protect human rights and minimize the risk of modern slavery and human trafficking, we have implemented policies and training programs as outlined below. As a responsible entity, we apply these tools throughout our global operations.

Policies

Stantec maintains its **Human Rights Policy**, **Human Trafficking and Modern Slavery Policy** and **Partner Code of Business Conduct** in relation to forced and child labour.

Since 2017, Stantec has issued an annual **Modern Slavery and Human Trafficking Statement** in compliance with the United Kingdom's and Australia's *Modern Slavery Acts*. Stantec has also participated in the **United Nations Global Compact** since 2015, which confirms our commitment to its ten principles, including the elimination of all forms of forced and compulsory labour and effective abolition of child labour.

Training

Our training and awareness materials on forced labour and child labour are included in our ethics training that is required to be taken annually by all employees. These materials cover the definition and indicators of forced labour and child labour, legal and ethical implications, requirements for prevention and reduction, and the roles and responsibilities of different actors. We deliver the training and awareness materials through online courses. We also encourage feedback and suggestions from the participants

to improve the quality and effectiveness of the materials.

Stantec encourages anyone (including employees, suppliers, partners, subcontractors, subconsultants, clients, and community members) to report unlawful actions or unethical behaviors that violate our policies via our hotline. In that regard, concerns of any nature can be confidentially and anonymously reported at www.stantec.ethicspoint.com or a variety of toll-free numbers (managed by an independent hosting company in local languages).

Stantec has developed anti-forced labour and child labour contractual clauses for relevant suppliers and business partners. We endeavor to have partners execute these clauses during contract negotiations.

5. *Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour? (Required)

- Yes
 No

5.1 *If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply. (Required)

- Embedding responsible business conduct into policies and management systems
 Identifying and assessing adverse impacts in operations, supply chains and business relationships
 Ceasing, preventing or mitigating adverse impacts
 Tracking implementation and results
 Communicating how impacts are addressed
 Providing for or cooperating in remediation when appropriate

6. *Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? (Required)

- Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.
- Yes, we have started the process of identifying risks, but there are still gaps in our assessments.
- No, we have not started the process of identifying risks.

6.1 *If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply. (Required)

- The sector or industry it operates in
- The types of products it produces, sells, distributes or imports
- The locations of its activities, operations or factories
- The types of products it sources
- The raw materials or commodities used in its supply chains
- Tier one (direct) suppliers
- Tier two suppliers
- Tier three suppliers
- Suppliers further down the supply chain than tier three
- The use of outsourced, contracted or subcontracted labour
- The use of migrant labour
- The use of forced labour
- The use of child labour
- None of the above

7. *Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply. (Required)

- Agriculture, forestry, fishing and hunting
- Mining, quarrying, and oil and gas extraction
- Utilities
- Construction
- Manufacturing

- Wholesale trade
- Retail trade
- Transportation and warehousing
- Information and cultural industries
- Finance and insurance
- Real estate and rental and leasing
- Professional, scientific and technical services
- Management of companies and enterprises
- Administrative and support, waste management and remediation services
- Educational services
- Health care and social assistance
- Arts, entertainment and recreation
- Accommodation and food services
- Other services (except public administration)
- Public administration
- None of the above
- Other, please specify

8. Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable) (3,000 character limit).

As previously noted, Stantec's need to comply with this law is based on ownership of a native plant nursery in Indiana, United States, where we grow and sell native plants, seeds, and seed mixes for use in ecosystem restoration projects (wetland, prairie, and woodland restoration). The forced labour or child labour risk to Stantec is due to this participation in the agriculture sector.

We have conducted an initial risk assessment of the native plant nursery and have not identified any risk of forced labour or child labour related to our activities or that of our supply chain. This is because Stantec's corporate Human Resources and Procurement programs apply to nursery activities. All nursery employees, whether office or field workers, are subject to Stantec's well established hiring and onboarding practices and are required to complete the annual ethics training described in question 4. Any of the nursery's subcontractors and vendors

are subject to robust prequalification and onboarding processes and are required to comply with all applicable laws.

9. *Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains? (Required)

- Yes, we have taken measures
- No, we have not taken measures
- Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

9.1 *If yes, which remediation measures has the entity taken? Select all that apply. (Required)

- Actions to support victims of forced labour or child labour and/or their families, such as workforce reintegration and psychosocial support
- Compensation for victims of forced labour or child labour and/or their families
- Actions to prevent forced labour or child labour and associated harms from reoccurring
- Grievance mechanisms
- Formal apologies

N/A

10. *Has the entity taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains? (Required)

- Yes, we have taken measures
- No, we have not taken measures
- Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

11. *Does the entity currently provide training to employees on forced labour and/or child labour? (Required)

- Yes
- No

11.1 *If yes, is the training mandatory? (Required)

- Yes, the training is mandatory for all employees.
- Yes, the training is mandatory for employees making contracting or purchasing decisions.
- Yes, the training is mandatory for some employees.
- No, the training is voluntary.

12. *Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains? (Required)

- Yes
- No

12.1 *If yes, what method does the entity use to assess its effectiveness? Select all that apply. (Required)

- Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour
- Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and -child labour clauses
- Partnering with an external organization to conduct an independent review or audit of the organization's actions
- Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators

N/A

Stantec Inc.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

A handwritten signature in black ink, appearing to read "Gord Johnston", written in a cursive style.

Gordon A. Johnston, P.Eng.
President, CEO & Director

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Securities Exchange Listings

Stantec shares are listed on the Toronto Stock Exchange and the New York Stock Exchange under the symbol STN.

ON THE COVER
Stantec Employees