



Management Approach: Ethics and Compliance

Stantec is committed to sound principles of corporate governance and to managing our risks and strategic growth in a way that reflects our triple-bottom-line responsibilities.¹ By living our company value of “we do what is right,” we aspire to do business beyond just compliance with laws and regulations. We ask employees, partners, subcontractors, and vendors to live this Stantec value and take personal responsibility for their behaviors.

Code of Business Conduct

Our [Code of Business Conduct](#) sets global standards that employees are expected to follow in their day-to-day work. We count on employees, including staff from newly acquired firms, to conduct business in accordance with high ethical standards.² Stantec policies outline our practices and standards regarding conflicts of interest, anti-bribery practices, harassment and discrimination, data privacy, political activities, charitable contributions, sponsorships, whistleblowing, insider trading, human rights, and health, safety, security, and the environment.

Partner Code of Business Conduct

We influence partners in our supply chain with our [Partner Code of Business Conduct](#), which details our values, standards, and expectations. This includes competing without collusion, respecting human rights, protecting the environment, complying with health and safety best practices, preventing discrimination, and paying fair wages. This document is made available to everyone in Stantec’s value chain and signatures are required for high-risk partners.

Anti-corruption

Our [Anti-corruption Policy](#) requires that Stantec employees conduct business in accordance with high ethical, moral, and legal standards and do so in the best interests of the Company and its employees, shareholders, and other stakeholders. Stantec maintains business practices with the intention of earning the respect of those with whom the Company conducts business. We recognize that corruption is a possibility in our industry, and thus it is a factor we consider as we acquire new companies, grow with new client relationships, and expand our geographic footprint. To reduce corruption risk, we employ appropriate mitigation strategies: High risk projects are assessed for corruption-related risks, and the economic and political conditions of the markets we serve are closely monitored.

Stantec’s ethics and compliance programs comply with the Foreign Corrupt Practices Act (United States), the United Kingdom Bribery Act, the Corruption of Foreign Public Officials Act (Canada), and similar laws; and Stantec policies further prohibit the payment of bribes, kickbacks, political contributions to politicians, and improper charitable contributions and sponsorships. Requests for contributions and sponsorships follow a formal approval process with legal counsel oversight as required.

Anti-trust Behaviors

It is illegal for businesses to act together in ways that can limit competition, lead to higher prices, or hinder other businesses from entering the market. Stantec prohibits anti-competitive, anti-trust, and monopoly practices, and we specifically address this as a part of in-person training given to our senior leaders and communicate such guidance to all employees through our annual online ethics training.

Political Contributions

Stantec’s [Political Contributions and Lobbying Policy](#) prohibits employees from using Company funds to contribute to political candidates or parties, and we do not reimburse employees if they make personal contributions. After rigorous review, we occasionally support measures on local ballots to benefit the communities we serve.

Integrity Hotline

Stantec encourages anyone (including employees, suppliers, partners, subcontractors, subconsultants, clients, and community members) to speak up if they become aware of unlawful actions or unethical behaviors that violate our policies (including, but not limited to, ethical considerations, human resource issues, discrimination concerns, human rights issues, and financial and safety issues). Whether a concern applies to Stantec actions or that of our value chain, issues can be reported to our risk management team via integrity@stantec.com.

¹ Triple bottom line: a business’s focus that includes not only financial considerations but also social and environmental.

² Stantec closely reviews ethical practices as a key evaluation component when deciding on new acquisition targets.



Concerns of any nature can also be confidentially and anonymously reported by employees or third parties using our Company's Integrity Hotline via www.stantec.ethicspoint.com or a variety of toll-free numbers (managed by an independent hosting company and available in local languages).

Each Integrity Hotline report is assigned to a Corporate Integrity, Human Resources, Financial or Legal representative, as appropriate, for investigation. Every effort is made to maintain the confidentiality of anonymous reporters. Stantec does not tolerate retaliation against employees who voice concerns in good faith.

If a report about a violation of our policies has been substantiated, we take appropriate disciplinary action, corrective action, or both. The vice president of Corporate Integrity follows up to confirm that reports have been properly addressed.

Integrity Hotline reports are aggregated every quarter and reported to our board of directors. Serious complaints are reported immediately to the chair of the board-level Audit and Risk Committee.

Ethics Training

We update our ethics training each year to keep the content fresh and relevant. Real-world examples are included to reinforce the direct applicability of ethics, anti-corruption, and anti-trust messages. Additionally, in this training we reinforce Stantec's focus on climate action.

All employees are required to take the training and review policies annually. Employees must acknowledge that they have completed the training, thereby complying with our policies. Completion of this required training is consistently near 100%.

See all [Stantec Management Approaches](#)