HUMAN RIGHTS POLICY

May, 2025

Revision

Revision	Summary of Changes	Date
5	Replaced list of legally protected characteristics (“race, perceived race, ancestry, ethnicity, national origin, gender” and so forth) with phrase “in accordance with all legally protected grounds” to align to revised Inclusion and Belonging Policy. Retained Policy Owner Chief Ethics and Compliance Officer; removed ownership of Global Executive Director, ESG.	1-May-25

History

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Owner	Julianna Fox, Chief Ethics, Compliance and Sustainability Officer		
Approval		**Version**	**Approval date**
Policy Approval Committee		5	1-May-25
Governance, Ethics, and Compensation Committee (GECC)		5	1-May-25
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This Human Rights Policy (the "Policy") sets out WSP Global Inc. and its subsidiaries' (collectively, "WSP", "we", "us" or "our") approach to respecting, supporting and safeguarding human rights. We will not be complicit in human rights abuses. We are dedicated to enhancing our processes to uphold international human rights standards established within the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights. As signatories to the United Nations Global Compact, we have committed to implementing the Ten Principles and contributing to the United Nations Sustainable Development Goals ("SDGs").

Wherever we operate, this Policy, alongside local laws and regulations, will guide our decisions and we will cooperate with the relevant authorities in respecting and promoting internationally declared human rights. When local laws allow behaviour that is not permitted by this Policy or related WSP policies and procedures, we will respect local laws while still seeking ways to promote international human rights and raise awareness of best international practice.

This Policy applies to WSP and to all employees, including directors, officers, independent contractors and other persons subject to an employment-type relationship with WSP ("Employees"), as well as business partners acting on behalf of WSP as implemented through the Business Partner Code of Conduct.

Our Approach

WSP's approach to support and safeguard human rights is embedded in our policies and practices and set forth below:

1. **We Provide a Professional and Secure Work Environment**
    - We aim to provide a working environment in which people are treated with dignity and respect, free from harassment, discrimination and bullying.
    - We provide an environment in which our people can grow and develop, to allow us to achieve our business goals, retain top talent, and provide our people with the best opportunities to fulfill their potential.
    - We design our offices to provide a professional, collaborative, physically and psychologically safe, healthy and secure place to work.
    - We collect personal information only for legitimate business purposes and protect personal information in our care.
2. **We Promote Equality and Fair Labour Practices**

- We promote fair treatment and strive to eliminate unfair discrimination for all our people, in accordance with all legally protected grounds.
- We strive for equal opportunities and an open-minded culture. Our policies about recruitment, hiring, compensation, development and promotion are focused on merit, ability and performance.
- We provide our people with fair wages and benefits, to promote a respectable standard of living, and encourage them to have good work-life balance by promoting a flexible work environment consistent with our client delivery needs.
- We uphold our people's freedom to join any association or union, provided it does not contravene local law, as well as their right to collective bargaining, where applicable.

3. We Have Zero Tolerance for Modern Slavery

- We prohibit our people from engaging in, suggesting, allowing or ignoring modern slavery, including forced labour, child labour, sexual exploitation or abuse, and human trafficking, in their conduct of our business.
- We implement appropriate risk mitigating controls in relation to projects in countries with high modern slavery risk.

4. We Respect the Traditions, Cultures and Laws of the Places We Work

- We respect the traditions, cultures and laws of the countries in which we operate.
- We consider the concerns of the wider community, including national and local interests, and those of Indigenous communities, and act to mitigate them to the best of our capabilities.
- We acknowledge the unique and important interests that Indigenous Peoples have in the land, waters and wider environment affected by our work and are committed to valuing their engagement and inclusion.

5. We Partner With Like-Minded Business Partners

- We select our business partners with care and diligence, using a formal vetting process, and reflect their obligations in our Business Partner Code of Conduct and through contractual commitments.
- We investigate and assess any concern that a business partner has violated human rights and act if a violation is found.
- We are prepared to end any business relationship where our integrity could be questioned.

6. We Promote a Speak-Up Culture

- We encourage employees to speak up if they observe conduct contrary to the law, our Code of Conduct or policies, whether it is conscious or unconscious, intentional or unintentional.
- We provide methods to report illegal behaviour or conduct contrary to our Code of Conduct or policies, including through our Business Conduct Hotline.
- We investigate allegations of human rights violations, illegal behaviour or non-compliant conduct [in our operations] and act to remediate the impact.

Related Policies and Procedures

This Policy should be read in conjunction with WSP's Guiding Principles and policies, including:

- Code of Conduct
- Inclusion and Belonging Policy
- Privacy Policy
- Information Security Policy
- Health, Safety, Environmental and Quality Policy Statement
- Well-being Policy
- Environmental, Social & Governance (ESG) Statement
- Business Partner Code of Conduct
- High-Risk Countries and Sanctions Compliance Policy
- Regional WSP policies, statements and supporting documents, including employment handbooks and regional reconciliation action plans and policies, where applicable.

Where To Turn for Help

If in doubt about any aspect of this Policy, Employees may contact ethics@wsp.com or communicate directly with their regional Human Resources or Ethics representative.

Reporting Suspected Violations

Information on potential non-compliance with this Policy by WSP, its employees, or any business partner with whom WSP conducts or anticipates conducting business with must be reported promptly. Employees can report suspected misconduct to their manager, their

regional Ethics representative or WSP's Ethics team at ethics@wsp.com. Additionally, suspected misconduct can be reported confidentially and anonymously through WSP's Business Conduct Hotline, as permitted by applicable law. WSP will not tolerate any form of retaliation.

For more information on how to report suspected misconduct, refer to WSP's Code of Conduct, the Global Reporting, Investigations and Anti-Retaliation Policy, or WSP's website.

Governance And Review

This Policy will be reviewed annually and WSP will monitor its effectiveness in consultation with our leaders and other internal stakeholder groups. This Policy is owned by the Ethics team.