



# Modern Slavery and Human Trafficking Statement

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At AtkinsRéalis, we will not knowingly be complicit of human rights abuses. We work towards preventing forced labor, child labor, modern slavery, and human trafficking, including in our supply chain. We are committed to protecting individuals working directly or indirectly for AtkinsRéalis from any form of forced labor, child labor, modern slavery, and human trafficking.

This statement relates to the financial year of AtkinsRéalis Group Inc. ("AtkinsRéalis"), which ended on December 31, 2024, and is made in accordance with Section 11(4)(b) (ii) of the *Fighting Against Forced Labor and Child Labor in Supply Chains Act* (Canada) and Section 54 of the *Modern Slavery Act 2015* (UK).



# 1. Structure, Operations and Supply Chain

## a) Structure and Operations

AtkinsRéalis is a world-leading design, engineering services and nuclear company dedicated to engineering a better future for our planet and its people. We create sustainable solutions that connect people, data and technology to transform the world's infrastructure and energy systems. Together, with our industry partners and clients, our global team of consultants, designers, engineers and project managers, we can change the world.

Our corporate purpose and values drive how we deliver value to clients, how we manage resources, and how we innovate. We are proud of our inclusive, diverse, and energized approach, and we share an open culture founded on our values: safety, integrity, innovation, collaboration, and excellence.

### Markets

From designing entire cities to delivering nuclear power stations and transforming manufacturing systems, we focus our business in the areas that have the most impact on the way we all live and the resources we demand from the planet.



#### Transportation

- Rail & Transit
- Roads
- Aviation
- Ports



#### Buildings & Places

- Cities & Communities
- Social
- Commercial
- Residential Property



#### Water

- Water and Wastewater Utilities – Treatment & Resources
- Environment Protection, Regulation & Resilience



#### Minerals & Metals

- Minerals
- Metals



#### Defense

- Aerospace
- Defense
- Security



#### Industrial

- Life Sciences / Pharma
- Advanced / Hi-Tech Manufacturing
- General Manufacturing



#### Power & Renewables

- Power Grids
- Hydropower & Dams
- Alternative Energies & Technologies



#### Nuclear

- CANDU®
- CANDU MONARK™

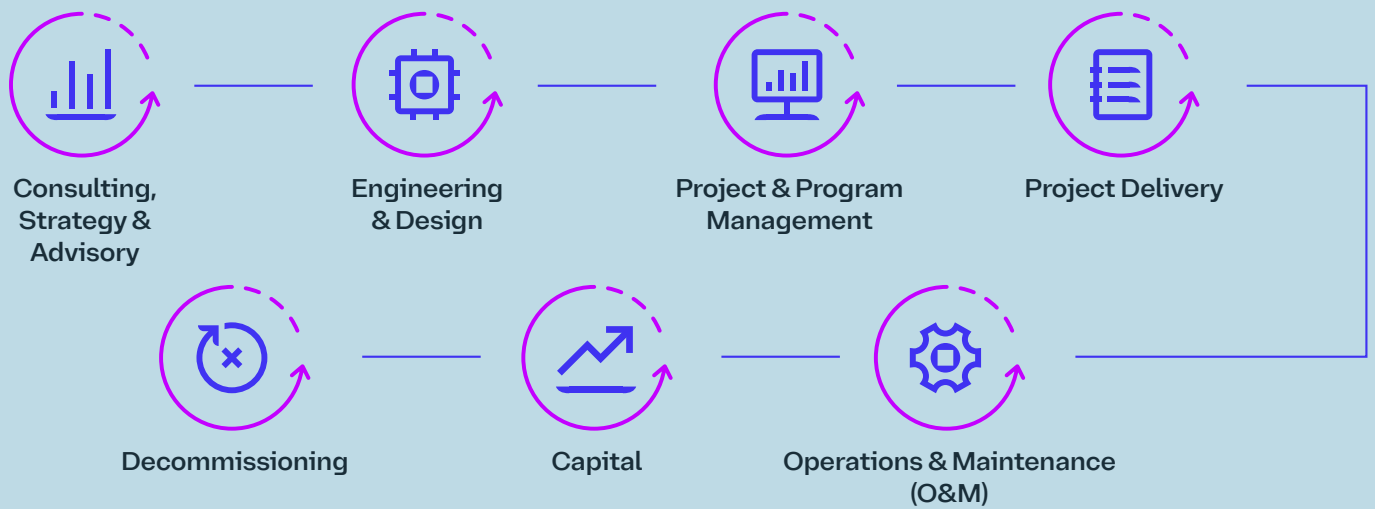
#### Reactor Support and Life Extension

#### Environmental Remediation

- Waste Management
- Decommissioning

## Services

Our commitment to a whole-life view of major development programs enables us to lead projects at every stage and ensure that, wherever we are involved, our people have a wider view of the challenge to better guide our clients and partners.



## b) Supply Chain

We recognize that there are risks regarding forced labor, child labor, modern slavery, and human trafficking in our supply chain. That environment is ever-changing, as our business operates in many regions and industries.

AtkinsRéalis' supply chain is comprised of a variety of third parties, including professional services, (e.g., financial, tax, legal, human resources and marketing services), information technology services, facilities/property management services and travel services (lodging, flight carriers, car rentals, etc.).

Project-specific suppliers might include equipment and material suppliers, labor brokers, recruitment agencies and a variety of specialized goods & services providers.



## 2. Risks

### a) Compliance Risk Assessments

The Compliance Risk Assessment (CRA) is designed to help us better understand the risks that our business operations may face. The objective is to produce focused and actionable information when defining risk, determine related remedial action within the organization and enable the senior leadership to periodically verify the progress of remedial actions.

We identify the most relevant risk scenarios based on 16 key risk indicators, including:

- FCPA International Enforcement and UKBA International Enforcement trends;
- Global Slavery Index;
- Analysis of financial records, including gifts and hospitality spending, donations and sponsorships, revenues in high-risk countries, etc.;
- The analysis of our internal investigations; and
- Through interviews within the organization.

We focus on understanding the types of misconduct that are most likely to occur in a line of business. Following a rigorous process, we detect gaps and assist local management with remedial action at the level where the risk is.

Our key performance indicators-based analysis, comprised of 16 carefully selected risk indicators, is carried out in our top countries. This proactive approach is fundamental to mitigating risk across the full spectrum of potential threats for our company and its stakeholders. The risk assessment is conducted every 18 months to identify new risk areas across all sectors in those countries.

### b) Craft Labor Workers

We acknowledge the risks faced by craft and general labor workers, particularly migrant workers. Migrant workers are more vulnerable to forced labor and often lack access to information and face language barriers. Consequently, we provide multilingual documentation, reporting channels, and conduct regular on-site visits.

### c) Recruitment Process

We recognize that the recruitment process, including the use of recruitment or placement agencies, can pose risks related to forced labor. We engage and collaborate with our recruitment and placement agencies to ensure that no fees are charged, no costs are incurred by candidates, no documents are withheld, and all applicable laws and industry standards on employee wages, working hours and minimum age are adhered to.



## 3. Actions

### a) Policies and Procedures

To ensure the transparency of the process, AtkinsRéalis makes all governance documents available to employees and the main integrity-related governance documents available to the public.

#### Code of Conduct

Our [Code of Conduct](#) articulates our values and includes a section dedicated to modern slavery. It sets the standards of how we work and conduct ourselves with unwavering integrity in everything we do. Compliance with the Code of Conduct is mandatory for all personnel.

#### Human Rights Policy

Our [Human Rights Policy](#) outlines our expectations and guidelines, including the prohibition of all forms of modern slavery, forced labor and child labor. We allow personnel to end their employment with appropriate notice, ensure employees maintain free access to their legal documents, cover recruitment and placement costs, prohibit compulsory and abusive overtime practices, ensure timely wage payments, and respect the freedom of association and personnel representation.

#### Counterparty Code of Conduct

AtkinsRéalis is committed to doing business with the highest integrity. Maintaining a reputation of integrity depends on the actions of everyone in the organization, as well as those of third parties the company partners with. The [Counterparty Code of Conduct](#) summarizes AtkinsRéalis' expectations and governing principles, including those related to human rights, modern slavery, and human trafficking, which our partners are required to accept and follow.

#### Compliance Procedure

Our personnel are the frontline enforcers of our Integrity value. We have a [Compliance Procedure](#) applying the principles laid out in our Code of Conduct to our operations, covering corruption, bribery, business partners and suppliers, gifts and hospitality, facilitation payments, antitrust and competition, political contributions, money laundering, tax evasion, and the duty to report.

#### Human Resources

Our human resources governance documents promote the protection of our personnel and candidates against modern slavery and human trafficking. It includes the Human Resources Policy, the [Work-related Discrimination, Harassment and Violence](#) Procedure.

### b) Due Diligence

At AtkinsRéalis, we expect third parties to share our values, act with integrity, and comply with all applicable laws and regulations. Before making any commitments to third parties, we conduct risk-based due diligence and checks:

- Our Integrity Checks verify if a third party is listed on watch lists (including denied and sanctions lists). We also review the history of corruption, collusion, fraud, or labor/human rights violations or related issues through adverse media and publicly available information research, whether it is a state-owned entity/politically exposed person, or appears on our Reference List before we decide whether to proceed with engaging them.
- Clients for international projects undergo an Integrity Check.
- Business partners performing intermediary functions on our behalf are also assessed. Based on defined risk indicators – such as the risk of corruption in the country in which the work is undertaken – a risk rating is specified for each transaction. The risk rating determines the subsequent action (e.g., due diligence, approval requirements, and mandatory contractual clauses) taken regarding business partners.
- Counterparties are required to accept integrity-related contractual provisions and adhere to our Counterparty Code of Conduct.

### c) Duty to Report

Our [reporting line](#) is an independent, confidential, and anonymous way to report ethical and compliance concerns. It's operated by an external service provider. Employees anywhere in the world must disclose in good faith, without fear of retaliation, concerns, complaints or allegations of known or suspected wrongdoing or misconduct. This can be done in person, online or by telephone.

At AtkinsRéalis, personnel and counterparties have a duty to report any known or suspected violation of our Code and governance documents; any suspected violation of applicable laws, rules, or regulations; any observed instances of misconduct; and any observed pressure to compromise AtkinsRéalis' ethical standards.

AtkinsRéalis does not tolerate retaliation against anyone who, in good faith, reports any of these or raises genuine concerns in the best interests of the organization.



## 4. Training and Awareness

### a) Training

Customized training programs have been designed to raise awareness of key ethics and compliance issues. They are assigned to AtkinsRéalis employees, board members, or consultants based on their roles and responsibilities.

To enhance awareness, key personnel receive additional training on identifying modern slavery and human trafficking risks in our supply chain and business. The training is available to all employees, and managers have the discretion to assign it to their respective teams.

For our craft and general labour workforce, we ensure awareness of our Code of Conduct and values by providing timely information by various means such as onboarding presentations and posters. Pictograms have been specifically developed in case employees cannot read or understand any of the languages in which our Code is available.

The modern slavery and human trafficking toolbox (which includes posters and a facilitation guide) offers a summary of our modern slavery and human trafficking principles. It provides real-life examples and advice on how to report any suspected or known violations.

### b) World Day against Trafficking in Persons

Each year, in the context of the [World Day Against Trafficking in Persons](#), AtkinsRéalis takes the opportunity to communicate our pledge to combat modern slavery and human trafficking to our employees.

## 5. Global Initiatives and Best Practices

### a) UN Global Compact

AtkinsRéalis has been a signatory of the UN Global Compact since 2015. This commitment means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labor, environment, and anti-corruption.

### b) Stakeholders Engagement

AtkinsRéalis is a member of the Modern Slavery Council of the Business Services Association. Located in the UK, the aim of the Modern Slavery Council is to create and maintain an industry focus on modern-day slavery, specifically from a procurement and supply chain perspective, and to prevent modern slavery in the UK operations and supply chains of its members.



## 6. Effectiveness

Monitoring the effectiveness of our actions is a key element in mitigating the risk of forced labor, child labor, modern slavery and human trafficking. We believe in spreading the message, setting the tone, and ensuring that any suspected act of forced labor, child labor, modern slavery or human trafficking is dealt with accordingly.

We review all reported matters and investigate them when required, within a reasonable timeframe. We also track and ensure the completion of our employees' mandatory training sessions and audit processes to flag, identify, and address potential weaknesses or risks.

### Compliance Control Framework

AtkinsRéalis uses its Compliance Control Framework (CCF) to test and monitor the internal controls that comprise its Integrity Program. Integrity Investigations ("I2") identifies the main risks related to integrity and holds discussions with relevant stakeholders to identify the key controls that directly respond to those risks. These controls are sampled and tested by the review team to determine whether the Integrity Program is being effectively implemented. For each CCF control procedure, the Review team assesses its design (i.e., whether the control mitigates the compliance risk identified) and operating effectiveness (i.e., whether the control operates as planned).

## 7. Our Commitment

At AtkinsRéalis, we will not knowingly be complicit of human rights abuses. We work towards preventing forced labor, child labor, modern slavery and human trafficking, including in our supply chain. We are committed to protecting individuals working directly or indirectly for AtkinsRéalis from any form of forced labor, child labor, modern slavery, and human trafficking.



## 8. Approval

This statement applies to AtkinsRéalis and all its subsidiaries. It has been approved by the Board of Directors of AtkinsRéalis and is hereby signed by AtkinsRéalis' President and Chief Executive Officer, who is also a member of its Board of Directors.

In accordance with the requirements of the *Fighting Against Forced Labor and Child Labor in Supply Chains Act* (Canada), the following entities are covered by the report:

AtkinsRéalis Group Inc.

AtkinsRéalis Canada Inc.

AtkinsRéalis Operations  
& Maintenance Inc.

AtkinsRéalis Major Projects Inc.

Candu Energy Inc.

SNC-Lavalin Nuclear Inc.

Protrans BC Operations Ltd.

In accordance with the requirements of the *Fighting Against Forced Labor and Child Labor in Supply Chains Act* (Canada), 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 white ink, appearing to read 'Ian L. Edwards'.

**IAN L. EDWARDS**

*President and CEO, and  
on behalf of the Board of  
Directors*

I have the authority to bind  
AtkinsRéalis.

March 13, 2025

