



SNC • LAVALIN

# APPENDIX B GRI INDEX////

2021 SUSTAINABILITY REPORT



## GENERAL DISCLOSURE

### 102-1

#### Name of the organization

##### REPORTING REQUIREMENTS

- a. Report the name of the organization.

##### SNC-LAVALIN'S 2021 DISCLOSURE

SNC-Lavalin Group Inc. (the Company).

### 102-2

#### Activities, brands, products, and services

##### REPORTING REQUIREMENTS

- a. A description of the organization's activities.
- b. Primary brands, products, and services, including an explanation of any products or services that are banned in certain markets.

##### SNC-LAVALIN'S 2021 DISCLOSURE

- a. Please refer to Section 1 Our business of the Management's Discussion and Analysis (MD&A), starting on p. 103 of our 2021 Annual Report.
- b. Please refer to the "Market and services" Section of our Website at <https://www.snclavalin.com/en/markets-and-services>. SNC-Lavalin does not sell products that are banned in any markets. SNC-Lavalin does however offer services that could potentially be subject to public debate, such as services to the nuclear industry, as well as both the Canadian and UK ministry of defense. SNC-Lavalin is not currently subject to direct questions or expressions of concern regarding these services.

### 102-3

#### Location of headquarters

##### REPORTING REQUIREMENTS

- a. Report the location of the organization's headquarters.

##### SNC-LAVALIN'S 2021 DISCLOSURE

- a. The Company's headquarters and registered office is located at 455 Rene-Levesque Boulevard West, Montreal, Quebec, Canada H2Z 1Z3.

### 102-4

#### Location of operations

##### REPORTING REQUIREMENTS

Report the number of countries where the organization operates, and names of countries where either the organization has significant operations or that are specifically relevant to the sustainability topics covered in the report.

##### SNC-LAVALIN'S 2021 DISCLOSURE

As of December, 2021, the Company had permanent offices in 39 countries, including the major offices located in the following regions:

- > **The Americas:** Brazil, Canada, Peru, United States.
- > **Europe:** Denmark, Ireland, Norway, Romania, Sweden, United Kingdom.
- > **Africa & the Middle East:** Algeria, Oman, Qatar, Saudi Arabia, United Arab Emirates.
- > **Asia & Oceania:** Australia, China, Hong Kong, India, Singapore.

SNC-Lavalin has temporary offices in additional countries and conducts projects in some 100 countries worldwide.

## 102-5

### Ownership and legal form

#### REPORTING REQUIREMENTS

- a. Report the nature of ownership and legal form.

#### SNC-LAVALIN'S 2021 DISCLOSURE

The Company was incorporated under the laws of Canada by Letters Patent on May 18, 1967, and was continued under the Canada Business Corporations Act on March 24, 1980. The shares of the Company are traded on the Toronto Stock Exchange (TSX: SNC).

As stated on p. 57 of our 2021 Financial report, there were no stock options outstanding in 2021 and 2020. The stock option compensation cost recorded in the year ended December 31, 2021 was \$nil. The Company did not issue and did not repurchase any shares during either 2021 or 2020. The number of common shares outstanding as at February 16, 2022 was 175,554,252.

Other than the CDPQ Loan (as amended) or as elsewhere described in the Company's 2021 Annual Information Form, to the knowledge of the Company, none of the (i) directors or executive officers of the Company, (ii) shareholders of the Company that beneficially own, or control or direct, directly or indirectly, more than 10% of any class of shares of the Company, or (iii) any associate or affiliate of the persons referred to in (i) and (ii), has or has had any material interest, direct or indirect, in any transaction during the three most recently completed financial years or the current financial year that has materially affected or is reasonably expected to materially affect the Company or any of its affiliates or subsidiaries.

## 102-6

### Markets served

#### REPORTING REQUIREMENTS

- a. Markets served, including:
- i. geographic locations where products and services are offered;
  - ii. sectors served;
  - iii. types of customers and beneficiaries.

#### SNC-LAVALIN'S 2021 DISCLOSURE

- i.ii. For a summary of markets served, including geographic breakdowns and sectors, please see sections 1, "Our Business" on p.103 and following and 6, "Geographic Breakdown of Revenues" on p.131 of our 2021 Annual report, under the Management's Discussion and Analysis (MD&A).
- iii. The Company serves a wide range of customers in the public, quasi-public and private sectors. Section 4.2.4 of the MD&A, "ANALYSIS OF SEGMENT RESULTS AND PERFORMANCE," starting on p.121 of the 2021 Annual report, provides an overview of projects and clients by sectors (segments) of activity. It has to be noted that the Company offers professional services to other businesses and does not manufacture household or consumer products..

## 102-7

### Scale of the organization

#### REPORTING REQUIREMENTS

- a. Report the scale of the organization, including:
  - > Total number of employees;
  - > Total number of operations;
  - > Net sales (for private sector organizations) or net revenues (for public sector organizations);
  - > Total capitalization broken down in terms of debt and equity (for private sector organizations);
  - > Quantity of products or services provided.

#### SNC-LAVALIN'S 2021 DISCLOSURE

As of December 31, 2021: Total number of employees (headcount): approximately 31,000 (includes all employees and consultants, full and part time), representing about 29,000 Full Time Employee Equivalent (FTE).

Total number of operations: see section 1, "Our Business" on p.103 and following of our 2021 Annual Report.

For information on revenues, please see p.44 and following of our Annual Report. For information on total capitalization please see Section 9 "Financial Position" on p.144 and following of our 2021 Annual Report.

- d. Whether a significant portion of the organization's activities are performed by workers who are not employees. If applicable, a description of the nature and scale of work performed by workers who are not employees.
- e. Any significant variations in the numbers reported in Disclosures 102-8-a, 102-8-b, and 102-8-c (such as seasonal variations in the tourism or agricultural industries).
- f. An explanation of how the data have been compiled, including any assumptions made.

#### SNC-LAVALIN'S 2021 DISCLOSURE

- a-c. For employee breakdowns, see graphics on p.29 of the present report;
- d. As of December 31st, 2021, 15% of employees were considered "temporary workers". Temporary Workforce includes Contractual employees, Casual employees, Temporary Agency workers and Consultants.
- e. SNC-Lavalin does not see seasonal fluctuations of its temporary workforce and does not conduct any activities akin to tourism or agriculture. Fluctuations do happen, however, following the life cycle of construction projects. But no significant change was noted through 2021.

## 102-9

### Supply chain

#### REPORTING REQUIREMENTS

- a. A description of the organization's supply chain, including its main elements as they relate to the organization's activities, primary brands, products, and services.

#### SNC-LAVALIN'S 2021 DISCLOSURE

SNC-Lavalin is currently implementing a vendor management system. At the end of this process, it is expected that the Company will be in better position to disclose this information.

## 102-8

UNGC PRINCIPLE 6: Labour

UN SDG 8 - Employment

### Information on employees and other workers

#### REPORTING REQUIREMENTS

- a. Total number of employees by employment contract (permanent and temporary), by gender.
- b. Total number of employees by employment contract (permanent and temporary), by region.
- c. Total number of employees by employment type (full-time and part-time), by gender.

Also note that SNC-Lavalin is mainly an engineering consulting company offering professional services. As such, we primarily purchase office and IT equipment, as well as services related to the occupation of rented properties.

For all construction management and Operation & Maintenance contracts, SNC-Lavalin's supply chain is based on the nature, type and geographic location of projects, and is therefore highly variable from one year to another as these factors evolve.

SNC-Lavalin expects all suppliers to abide to its Supplier Code of Conduct, available on line at: <https://www.snclavalin.com/~media/Files/S/SNC-Lavalin/download-centre/en/policy/supplier-code-conduct-en.pdf>

## 102-10

### Significant changes to the organization and its supply chain

#### REPORTING REQUIREMENTS

- a. Report any significant changes during the reporting period regarding the organization's size, structure, ownership or supply chain, including:
  - > Changes in the location of, or changes in, operations, including facility openings, closings, and expansions;
  - > Changes in the share capital structure and other capital formation, maintenance, and alteration operations (for private sector organizations);
  - > Changes in the location of suppliers, the structure of the supply chain, or in relationships with suppliers, including selection and termination.

#### SNC-LAVALIN'S 2021 DISCLOSURE

Please see section 3.2 of the MD&A "Executive Summary – Other Items", p.111, of the 2021 Annual report.

Most notably, on July 29, 2021, the Company completed the sale of a substantial portion of its Oil & Gas business and the sale of the remaining Saudi Arabian portion of the business was completed on August 15, 2021.

Notes are included throughout the present report in instances where this divestment had a significant effect on KPIs and indicators, such as the GHG emissions inventory.

## 102-11

### Precautionary Principle or approach

#### REPORTING REQUIREMENTS

- a. Report whether and how the precautionary approach or principle is addressed by the organization.

#### SNC-LAVALIN'S 2021 DISCLOSURE

As of December 31<sup>st</sup>, 2021, the Company was mainly an engineering service provider, not a manufacturer of products. As such, the Company employs risk management processes, which are being expanded to cover not only project-based risks, but also Company-wide risks.

Currently, the precautionary principle does not form part of corporate risk management processes. However, SNC-Lavalin applies best practices and manages environment and health and safety risks through its management systems which are compliant with ISO 14001 and 45001.

In addition, the vast majority of our clients' projects are subjected to environmental and/or social impact assessments. SNC-Lavalin is thus expected not only to follow those reports' recommendations, but also to work in collaboration with clients and contractors to limit as much as possible the impacts and risks associated with the projects we work on.

## 102-12

### External initiatives

#### REPORTING REQUIREMENTS

- a. List externally developed economic, environmental and social charters, principles or other initiatives to which the organization subscribes or which it endorses.

#### SNC-LAVALIN'S 2021 DISCLOSURE

The Company applies the most stringent of the prevailing national laws or recognized international standards. In addition, the company adheres to voluntary initiatives such as :

**PACI:** SNC-Lavalin joined the World Economic Forum Partnering Against Corruption Initiative (PACI) Vanguard CEO community since 2014.

**UNGC:** In 2015, the Company adhered to the United Nations Global Compact. Please refer to our CEO's message in the present report as well as our Communication on Progress publicly available on the UNGC Webpage (<https://www.unglobalcompact.org/what-is-gc/participants>).

**Race to Zero:** In October 2021, SNC-Lavalin joined the Race to Zero, a commitment further supported by the commitment to the Science Based Target Initiative in early 2022.

**WEF:** In December 2021, SNC-Lavalin adhered to the World Economic Forum's Stakeholder Capitalism Metrics.

## 102-13

### Membership of associations

#### REPORTING REQUIREMENTS

- a. A list of the main memberships of industry or other associations, and national or international advocacy organizations.

#### SNC-LAVALIN'S 2021 DISCLOSURE

Please see the Section titled "MEMBERSHIPS, TRADE ASSOCIATIONS AND OTHER THIRD-PARTY STAKEHOLDERS" on pp.6-7 of our 2021 Lobbying and Political Activities report, available at: <https://www.snclavalin.com/~media/Files/S/SNC-Lavalin/download-centre/en/report/lobbying-and-political-activities-2021-en.pdf>

## 102-14

### Statement from senior decision-maker

#### REPORTING REQUIREMENTS

- a. A statement from the most senior decision-maker of the organization (such as CEO, chair, or equivalent senior position) about the relevance of sustainability to the organization and its strategy for addressing sustainability.

#### SNC-LAVALIN'S 2021 DISCLOSURE

Please see CEO's message in this report.

## 102-16

UNGC PRINCIPLE 10: Anti-corruption  
UN SDG 16 - Ethical and lawful behavior

### Values, principles, standards, and norms of behavior

#### REPORTING REQUIREMENTS

- a. Describe the organization's values, principles, standards and norms of behavior such as codes of conduct and codes of ethics.

#### SNC-LAVALIN'S 2021 DISCLOSURE

In 2021, SNC-Lavalin unveiled its new purpose "Engineering a better future for our planet and its people".

For values, please refer to the About us section of our website at: <https://www.snclavalin.com/en/about/vision-and-values>.

Our code of conduct is publicly available at: [https://www.snclavalin.com/~media/Files/S/SNC-Lavalin/documents/policies/1003\\_en.pdf](https://www.snclavalin.com/~media/Files/S/SNC-Lavalin/documents/policies/1003_en.pdf). The SUSTAINABILITY, GOVERNANCE AND LEADERSHIP section of the present report also give an overview of how SNC-Lavalin embeds sustainability in its business structure.

## 102-17

### Mechanisms for advice and concerns about ethics

#### REPORTING REQUIREMENTS

- a. A description of internal and external mechanisms for:
  - i. seeking advice about ethical and lawful behavior, and organizational integrity;
  - ii. reporting concerns about unethical or unlawful behavior, and organizational integrity.

#### SNC-LAVALIN'S 2021 DISCLOSURE

- i. Please see our 2022 Integrity Highlights document (available at: <https://www.snclavalin.com/~media/Files/S/SNC-Lavalin/documents/integrity-highlights-en.pdf>), specifically Section titled Reporting and Channels for reporting misconduct and seeking advice on p.24.
- ii. As stated in our Code of Conduct (please see p.45, the Code is available at: [https://www.snclavalin.com/~media/Files/S/SNC-Lavalin/documents/policies/1003\\_en.pdf](https://www.snclavalin.com/~media/Files/S/SNC-Lavalin/documents/policies/1003_en.pdf)), employees have a duty to report:
  - › Any known or suspected violation of our Code or any other governance documents;
  - › Any suspected violation of applicable laws, rules or regulations;
  - › Any observed instances of misconduct; and
  - › Any observed pressure to compromise our ethical standards.

Access to the secure reporting system operated by an independent third-party service provider (Clearview Connects) is available directly from our Website (at: <https://www.snclavalin.com/en/site-services/reporting-line>).

Internal trainings and Integrity moments also provide examples to help employees determine the best channel to voice concerns between talking to a manager, contacting the local Integrity Officer, reaching out to an HR Partner, or using the aforementioned reporting line.

## 102-18

### Governance structure

#### REPORTING REQUIREMENTS

- a. Governance structure of the organization, including committees of the highest governance body.
- b. Committees responsible for decision-making on economic, environmental, and social topics.

#### SNC-LAVALIN'S 2021 DISCLOSURE

- a. Please see the "Board of directors" (<https://www.snclavalin.com/en/about/leadership-and-governance/board-of-directors>), "Leadership Team" (<https://www.snclavalin.com/en/about/leadership-and-governance/leadership-team>) and the "Governance" (<https://www.snclavalin.com/en/about/leadership-and-governance/governance>) sections of our website.
- b. The Governance, Ethics and Sustainability Committee assists the Board in developing the Corporation's approach to corporate governance, ethical, compliance and sustainability issues. The Safety, Project Oversight and Technology Committee is responsible for overseeing the overall framework for managing projects, technology and health, safety, environment and security, arising from the Company's operations and businesses.

The mandates of these committees can be accessed via the "Governance" section of our website (<https://www.snclavalin.com/en/about/leadership-and-governance/governance>) section of our website. It has to be noted that those mandates were reviewed in 2021.

## 102-40

### List of stakeholder groups

#### REPORTING REQUIREMENTS

- a. Provide a list of stakeholder groups engaged by the organization.

#### SNC-LAVALIN'S 2021 DISCLOSURE

The Company considers its key stakeholders to be its clients, its top shareholders/ investors and its employees.

The company also engages with governments, NGOs and other civil society organizations as common preoccupations arise. Business units are encouraged to engage local communities, particularly in less developed countries and in urban areas, near project sites under the Company's management.

## 102-41

UNGC PRINCIPLE 3: Labour

UN SDG 8 - Freedom of association and collective bargaining

### Collective bargaining agreements

#### REPORTING REQUIREMENTS

- a. Report the percentage of total employees covered by collective bargaining agreements.

#### SNC-LAVALIN'S 2021 DISCLOSURE

As of December 2021, the percentage of unionized employees was 5.3% of our global workforce, or about 1,600 people.



## 102-42

### Identifying and selecting stakeholders

#### REPORTING REQUIREMENTS

- a. Report the basis for identification and selection of stakeholders with whom to engage.

#### SNC-LAVALIN'S 2021 DISCLOSURE

SNC-Lavalin acknowledges that long-term value creation is fuelled by constant dialogue and involvement with its stakeholders in order to identify their priorities and concerns.

SNC-Lavalin engages with all stakeholders who communicate with the corporation and establishes a continuous and transparent relationship with stakeholders, investing in communication and engagement channels for each of these audiences.

## 102-43

### Approach to stakeholder engagement

#### REPORTING REQUIREMENTS

- a. Report the organization's approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process.

#### SNC-LAVALIN'S 2021 DISCLOSURE

The approaches and frequency of engagement vary according to each audience and their specific perspective. This is how we ensure that the Company's strategies align with the expectations of its stakeholders.

Regarding engagement with shareholders, please see "Shareholder Engagement" section, p.48, of the Management Proxy Circular and Notice of Annual Meeting of Shareholders, dated March 14<sup>th</sup>, 2022.

External stakeholders were not consulted in the report preparation process.

## 102-44

### Approach to stakeholder engagement Key topics and concerns raised

#### REPORTING REQUIREMENTS

- a. Key topics and concerns that have been raised through stakeholder engagement, including:
  - i. how the organization has responded to those key topics and concerns, including through its reporting;
  - ii. the stakeholder groups that raised each of the key topics and concerns.

#### SNC-LAVALIN'S 2021 DISCLOSURE

**Clients:** Client surveys did not denote an increased interest for topics related to sustainable development amongst our clients. However, based on the fact that clients have been asking SNC-Lavalin to fill "supplier reports" regarding our GHG emissions using CDP's platform for the last seven years and that call for proposal questionnaires now generally include sections regarding environmental management and/or sustainable development related metrics, we consider these topics to be somewhat significant for our clients.

**Shareholders:** Prior to the Annual Meeting of Shareholders (held May 5<sup>th</sup>, 2022), two organisations, Share and the Mouvement d'éducation et de défense des actionnaires ("MÉDAC"), transmitted questions related to sustainability, namely regarding the representation of women in management position; Senior Leadership Compensation; and Diversity, Equity and Inclusion-related data.

Those questions were addressed in the Proxy Circular (Please see "SCHEDULE A - SHAREHOLDER PROPOSALS", on p.119 and following at: <https://www.snclavalin.com/~media/Files/S/SNC-Lavalin/investor-briefcase/en/2022/snc-lavalin-proxy-circular-2022-en.pdf>).

In addition, shareholders and investors do refer to reports and ratings prepared by firms dedicated to ESG and Corporate Governance research. SNC-Lavalin does communicate and collaborate with firms such as Sustainalytics, MSCI and ISS. The Company also files reports regarding carbon emissions via the CDP's annual questionnaire.

**Employees:** Our 2017 general employee survey helped SNC-Lavalin determine its values and vision. Topics explicitly pertaining to sustainable development were not retained. However, we consider that these topics are covered by the umbrella values of "Integrity" and "Safety".

To read about SNC-Lavalin's definition of these values, please refer to: <https://www.snclavalin.com/en/about/vision-and-values>

In 2021, a range of Sustainability/ESG Questions have been incorporated in the employee VOX survey as part of our materiality assessment, to allow employees to express their priorities and concerns in relation to the management of sustainability within the company.

The three topics that emerged as top priorities were Climate, Energy and Health, with Integrity and Transport coming in fourth and fifth place, respectively.

- b. Report whether any entity included in the organization's consolidated financial statements or equivalent documents is not covered by the report. The organization can report on this Standard Disclosure by referencing the information in publicly available consolidated financial statements or equivalent documents.

## SNC-LAVALIN'S 2021 DISCLOSURE

- a. The main Segments (sectors) of the Company are presented in Section 1 of the 2021 MD&A "Our Business" on p.103 of our 2021 Annual report. As of December 2021, the Company's reportable segments are:

- > EDPM;
- > Nuclear;
- > O&M;
- > Infrastructure LSTK Projects; and
- > Capital

A list of main subsidiaries, joint arrangements and associates of the Company, as well as the principal infrastructure concession entities in which the Company participates, are published in note 37 to the 2021 audited financial statements "Subsidiaries, Joint Arrangements and Associates," on p.95 and following of the 2021 Annual report.

- b. Unless stated otherwise, all Segments (sectors) are included in the present report, but not the subsidiaries, joint venture and associates.

## 102-45

## Entities included in the consolidated financial statements

### REPORTING REQUIREMENTS

- a. List all entities included in the organization's consolidated financial statements or equivalent documents.

102-46

## Defining report content and topic Boundaries

### REPORTING REQUIREMENTS

- a. Explain the process for defining the report content and the Aspect Boundaries.
- b. Explain how the organization has implemented the Reporting Principles for Defining Report Content.

### SNC-LAVALIN'S 2021 DISCLOSURE

Issues of content, scope, boundaries, materiality and prioritization were reviewed by a joint team composed of representatives Integrity and ESG, Global Corporate Communications and external consultants.

102-47

## List of material topics

### REPORTING REQUIREMENTS

- a. A list of the material topics identified in the process for defining report content.

### SNC-LAVALIN'S 2021 DISCLOSURE

Please see the "Material Topics" section of the present report, on p. 33.

102-48

## Restatements of information

### REPORTING REQUIREMENTS

- a. Report the effect of any restatements of information provided in previous reports, and the reasons for such restatements.

### SNC-LAVALIN'S 2021 DISCLOSURE

As stated on p.58 of the present report, SNC-Lavalin restated its Scope 3 GHG emissions for year 2020 as a mistake was noticed with regards to emission factors after publication of the data.

102-49

## Changes in reporting

### REPORTING REQUIREMENTS

- a. Significant changes from previous reporting periods in the list of material topics and topic Boundaries.

### SNC-LAVALIN'S 2021 DISCLOSURE

No change to disclose. The Company is currently completing a materiality assessment and the proceedings will be disclosed in the 2022 Sustainability Report which will be published in 2023.

102-50

## Reporting period

### REPORTING REQUIREMENTS

- a. Reporting period (such as fiscal or calendar year) for information provided.

### SNC-LAVALIN'S 2021 DISCLOSURE

The 2021 calendar year, which is also the Company's fiscal year.

## 102-51

### Date of most recent report

#### REPORTING REQUIREMENTS

- a. Date of most recent previous report (if any).

#### SNC-LAVALIN'S 2021 DISCLOSURE

September 22nd, 2021

## 102-52

### Reporting cycle

#### REPORTING REQUIREMENTS

- a. Reporting cycle (such as annual, biennial).

#### SNC-LAVALIN'S 2021 DISCLOSURE

Annual

## 102-53

### Contact point for questions regarding the report

#### REPORTING REQUIREMENTS

- a. Provide the contact point for questions regarding the report or its contents.

#### SNC-LAVALIN'S 2021 DISCLOSURE

For questions regarding this report and its contents, an inquiry form is available on the Web page dedicated to Sustainability at <https://www.snclavalin.com/en/sustainability>.

## 102-54

### Claims of reporting in accordance with the GRI Standards

#### REPORTING REQUIREMENTS

- a. The claim made by the organization, if it has prepared a report in accordance with the GRI Standards, either:
  - i. 'This report has been prepared in accordance with the GRI Standards: Core option';
  - ii. 'This report has been prepared in accordance with the GRI Standards: Comprehensive option'.

#### SNC-LAVALIN'S 2021 DISCLOSURE

This report has been prepared in accordance with the GRI Standards: Core option.

## 102-55

### GRI content index

#### REPORTING REQUIREMENTS

- a. The GRI content index, which specifies each of the GRI Standards used and lists all disclosures included in the report.
- b. For each disclosure, the content index shall include:
  - i. the number of the disclosure (for disclosures covered by the GRI Standards);
  - ii. the page number(s) or URL(s) where the information can be found, either within the report or in other published materials;
  - iii. if applicable, and where permitted, the reason(s) for omission when a required disclosure cannot be made.

#### SNC-LAVALIN'S 2021 DISCLOSURE

GRI Content Index of this report.



102-56

## External assurance

### REPORTING REQUIREMENTS

- a. A description of the organization's policy and current practice with regard to seeking external assurance for the report. b. If the report has been externally assured:
  - i. A reference to the external assurance report, statements, or opinions. If not included in the assurance report accompanying the sustainability report, a description of what has and what has not been assured and on what basis, including the assurance standards used, the level of assurance obtained, and any limitations of the assurance process;
  - ii. The relationship between the organization and the assurance provider;
  - iii. Whether and how the highest governance body or senior executives are involved in seeking external assurance for the organization's sustainability report.

### SNC-LAVALIN'S 2021 DISCLOSURE

- a. SNC-Lavalin's 2021 Sustainability report included select key performance indicator's that were independently assured to a limited level.
  - i. Ernst & Young LLP (EY) was engaged to provide limited assurance over select key performance indicators as identified in appendix C.
  - ii. EY is an independent third-party organization.
  - iii. Refer to ii, above.

## MANAGEMENT APPROACH

### 103-1

## Explanation of the material topic and its Boundary

### REPORTING REQUIREMENTS

- a. An explanation of why the topic is material.
- b. The Boundary for the material topic, which includes a description of:
  - i. where the impacts occur;
  - ii. the organization's involvement with the impacts. For example, whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships.
- c. Any specific limitation regarding the topic Boundary.

### SNC-LAVALIN'S 2021 DISCLOSURE

Please see Section 5.1. "Materiality Assessment" on p.27 and following of our 2019 Sustainability report at <https://www.snclavalin.com/~media/Files/S/SNC-Lavalin/download-centre/en/report/sustainability-report-2019.pdf>.

Note that a materiality assessment was undertaken in 2022 and that the results of this assessment, including material topics, will be disclosed in next year's report.

### 103-2

UN SDG 1, 5, 8 and 16 - Economic inclusion; Grievance mechanisms

## The management approach and its components

### REPORTING REQUIREMENTS

- a. An explanation of how the organization manages the topic.
- b. A statement of the purpose of the management approach.

- c. A description of the following, if the management approach includes that component:
  - i. Policies
  - ii. Commitments
  - iii. Goals and targets
  - iv. Responsibilities
  - v. Resources
  - vi. Grievance mechanisms
  - vii. Specific actions, such as processes, projects, programs and initiatives

### SNC-LAVALIN'S 2021 DISCLOSURE

Please see the Section titled "Governance" in the present report, starting on p. 19.

### 103-3

## Evaluation of the management approach

### REPORTING REQUIREMENTS

- a. An explanation of how the organization evaluates the management approach, including:
  - i. the mechanisms for evaluating the effectiveness of the management approach;
  - ii. the results of the evaluation of the management approach;
  - iii. any related adjustments to the management approach.

### SNC-LAVALIN'S 2021 DISCLOSURE

No formal evaluation of the management approach has been completed in 2021.

## ECONOMIC PERFORMANCE

### 201-1

UN SDG 2, 5, 7, 8 and 9- Infrastructure investments; Economic performance; Research and development

### Direct economic value generated and distributed

#### REPORTING REQUIREMENTS

- a. Report the direct economic value generated and distributed (EVG&D) on an accruals basis including the basic components for the organization's global operations as listed below. If data is presented on a cash basis, report the justification for this decision and report the basic components as listed below:

› Direct economic value generated:

- Revenues;

› Economic value distributed:

- Operating costs;
- Employee wages and benefits;
- Payments to providers of capital;
- Payments to government (by country);
- Community investments;

› Economic value retained (calculated as 'Direct economic value generated' less 'Economic value distributed').

- b. To better assess local economic impacts, report EVG&D separately at country, regional, or market levels, where significant. Report the criteria used for defining significance.

#### SNC-LAVALIN'S 2021 DISCLOSURE

- a. Please refer to the "Consolidated Statements of Financial Position" and the "Consolidated Income Statements" sections of the 2021 audited annual consolidated financial statements (p.5 and 7 of the 2021 Annual Report), as well as to Note 32 "Pension plans, other long-term benefits and other post-employment benefits" to the 2021 audited annual consolidated financial statements (p.79 of the 2021 Annual Report). This information is also summarized on p. 32 of the present report.

- b. Please refer to Section 6 "Geographic Breakdown of Revenues" of the 2021 MD&A and Note 4 "Segment Disclosure" to the 2021 audited annual consolidated financial statements (respectively on p.131 and p.29 of the 2021 Annual Report). This information is also summarized on p. 30 of the present report.

### 201-2

UNGC PRINCIPLE 7: Environment

UN SDG 13 - Risks and opportunities due to climate change

### Financial implications and other risks and opportunities due to climate change

#### REPORTING REQUIREMENTS

- a. Report risks and opportunities posed by climate change that have the potential to generate substantive changes in operations, revenue or expenditure, including:
- › A description of the risk or opportunity and its classification as either physical, regulatory or other;
  - › A description of the impact associated with the risk or opportunity;
  - › The financial implications of the risk or opportunity before action is taken;
  - › The methods used to manage the risk or opportunity;
  - › The costs of actions taken to manage the risk or opportunity.

#### SNC-LAVALIN'S 2021 DISCLOSURE

Please see SNC-Lavalin's Climate Change report submitted to the CDP at [www.cdp.net](http://www.cdp.net)

Our Climate Change reports are also available on our website at: <https://www.snclavalin.com/en/sustainability/sustainability-report#cdp-reports>

## 201-3

### Defined benefit plan obligations and other retirement plans

#### REPORTING REQUIREMENTS

- a. If the plan's liabilities are met by the organization's general resources, the estimated value of those liabilities.
- b. If a separate fund exists to pay the plan's pension liabilities:
  - i. the extent to which the scheme's liabilities are estimated to be covered by the assets that have been set aside to meet them;
  - ii. the basis on which that estimate has been arrived at;
  - iii. when that estimate was made.
- c. If a fund set up to pay the plan's pension liabilities is not fully covered, explain the strategy, if any, adopted by the employer to work towards full coverage, and the timescale, if any, by which the employer hopes to achieve full coverage.
- d. Percentage of salary contributed by employee or employer.
- e. Level of participation in retirement plans, such as participation in mandatory or voluntary schemes, regional, or country-based schemes, or those with financial impact.

#### SNC-LAVALIN'S 2021 DISCLOSURE

Please see Note 32 "Pension plans, other long-term benefits and other post-employment benefits" to the 2021 audited annual consolidated financial statements (p.79 of the 2021 Annual Report).

## 201-4

### Financial assistance received from government

#### REPORTING REQUIREMENTS

- a. Total monetary value of financial assistance received by the organization from any government during the reporting period, including:
  - i. tax relief and tax credits;
  - ii. subsidies;
  - iii. investment grants, research and development grants, and other relevant types of grant;
  - iv. awards;
  - v. royalty holidays;
  - vi. financial assistance from Export Credit Agencies (ECAs);
  - vii. financial incentives;
  - viii. other financial benefits received or receivable from any government for any operation.
- b. The information in 201-4-a by country.
- c. Whether, and the extent to which, any government is present in the shareholding structure.



## SNC-LAVALIN'S 2021 DISCLOSURE

- a. In 2021, the Company participated in various government assistance programs related to COVID-19, mainly in Canada (2020: mainly in Canada and the United Kingdom). The main programs resulted in governments subsidizing a portion of salaries paid by qualifying employers who experienced a decrease in activities exceeding a certain threshold or subsidizing salaries of employees that were no longer providing services to their employers but continued to receive compensation.
- b. Please see Note 38 "GOVERNMENT GRANTS" to the 2021 audited annual consolidated financial statements (p.97 of the 2021 Annual Report).
- c. No government is directly present in SNC-Lavalin's shareholding structure. It has to be noted however that both the Caisse de Dépôt et Placement du Québec (lit. Québec Deposit and Investment Fund, also referred to "the Caisse") and the Canada Pension Plan Investment Board are SNC-Lavalin shareholders. Those institutional investors were founded respectively by the Province of Québec's National Assembly and the Parliament of Canada. However, even if both are accountable to government authorities, they should act "with full independence" in accordance with the acts governing them.

## MARKET PRESENCE

### 202-1

UNGC PRINCIPLE 6: Labour

UN SDG 1, 5 and 8 - Earnings, wages and benefits;  
Equal remuneration for women and men

### Ratios of standard entry level wage by gender compared to local minimum wage

#### REPORTING REQUIREMENTS

- a. When a significant proportion of employees are compensated based on wages subject to minimum wage rules, report the relevant ratio of the entry level wage by gender at significant locations of operation to the minimum wage.
- b. When a significant proportion of other workers (excluding employees) performing the organization's activities are compensated based on wages subject to minimum wage rules, describe the actions taken to determine whether these workers are paid above the minimum wage.
- c. Whether a local minimum wage is absent or variable at significant locations of operation, by gender. In circumstances in which different minimums can be used as a reference, report which minimum wage is being used.
- d. The definition used for 'significant locations of operation'.

#### SNC-LAVALIN'S 2021 DISCLOSURE

SNC-Lavalin is an engineering and construction management company. As such there is not a significant proportion of our employees compensated based on wages subject to minimum wage rules.

### 202-2

UNGC PRINCIPLE 6: Labour

UN SDG 8 - Employment

### Proportion of senior management hired from the local community

#### REPORTING REQUIREMENTS

- a. Report the percentage of senior management at significant locations of operation that are hired from the local community.
- b. Report the definition of 'senior management' used.
- c. Report the organization's geographical definition of 'local'.
- d. Report the definition used for 'significant locations of operation'.

#### SNC-LAVALIN'S 2021 DISCLOSURE

- a. At the executive level, 84% of senior management was "from the local community".
- b. In this instance, SNC-Lavalin considers as "local" someone who has the nationality of his work location.

## INDIRECT ECONOMIC IMPACTS

### 203-1

UN SDG 2, 5, 7, 9 and 11 - Infrastructure investments

### Infrastructure investments and services supported

#### REPORTING REQUIREMENTS

- a. Extent of development of significant infrastructure investments and services supported.
- b. Current or expected impacts on communities and local economies, including positive and negative impacts where relevant.
- c. Whether these investments and services are commercial, in-kind, or pro bono engagements.

#### SNC-LAVALIN'S 2021 DISCLOSURE

Capital, our investment, project financing and asset management arm, manages a 2.4 billion dollar\* portfolio of infrastructure investments and raised over twelve billion dollar of project financing in the past 10 years.

The Company analyses its revenue and gross margin separately for Engineering and Construction activities (E&C) and for its investments (Capital). All financial analysis presented in the annual report and MD&A is clearly identified as either.

Note 5, "Capital investments" to the 2021 audited annual consolidated financial statements (p.32 and following of our 2021 Financial report) presents detailed information on investments.

\* Average Fair Market Value as per research analysts calculations, as at August 4, 2022.

### 203-2

UN SDG 1, 2, 3, 8, 10 and 17 - Availability of products and services for those on low incomes; Economic development in areas of high poverty; Changing the productivity of organizations, sectors, or the whole economy; Access to medicines; Changing the productivity of organizations, sectors, or the whole economy; Indirect impact on job creation; Jobs supported in the supplychain; Foreign direct investment

### Significant indirect economic impacts

#### REPORTING REQUIREMENTS

- a. Examples of significant identified indirect economic impacts of the organization, including positive and negative impacts.
- b. Significance of the indirect economic impacts in the context of external benchmarks and stakeholder priorities, such as national and international standards, protocols, and policy agendas.

#### SNC-LAVALIN'S 2021 DISCLOSURE

SNC-Lavalin is currently reassessing how to better monitor this indicator, including via the implementation of a new vendor management system.

## PROCUREMENT PRACTICES

### 204-1

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UN SDG 12 - Procurement practices

### Proportion of spending on local suppliers

#### REPORTING REQUIREMENTS

- a. Percentage of the procurement budget used for significant locations of operation that is spent on suppliers local to that operation (such as percentage of products and services purchased locally).
- b. The organization's geographical definition of 'local'.
- c. The definition used for 'significant locations of operation'.

#### SNC-LAVALIN'S 2021 DISCLOSURE

SNC-Lavalin does not compile global data in relation to this metric: ad hoc procurement teams are assembled, as needed, on a per project basis and data on purchased material is not aggregated at the company level.

However, in early 2022 SNC-Lavalin purchased a Vendor Management System Software and expect to be able to monitor this indicator more accurately in the coming years.



## ANTI-CORRUPTION

### 205-1

UNGC PRINCIPLE 10: Anti-corruption  
UN SDG 16 - Anti-corruption

## Operations assessed for risks related to corruption

### REPORTING REQUIREMENTS

- a. Report the total number and percentage of operations assessed for risks related to corruption.
- b. Report the significant risks related to corruption identified through the risk assessment.

### SNC-LAVALIN'S 2021 DISCLOSURE

Please refer to the "Integrity & Human Rights" section on p.69 of the present report and to our dedicated webpage at: <https://www.snclavalin.com/en/about/integrity>

### 205-2

UNGC PRINCIPLE 10: Anti-corruption  
UN SDG 16 - Anti-corruption

## Communication and training about anti-corruption policies and procedures

### REPORTING REQUIREMENTS

- a. Total number and percentage of governance body members that the organization's anti-corruption policies and procedures have been communicated to, broken down by region.
- b. Total number and percentage of employees that the organization's anti-corruption policies and procedures have been communicated to, broken down by employee category and region.
- c. Total number and percentage of business partners that the organization's anti-corruption policies and procedures have been communicated to, broken down by type of business partner and region. Describe if the organization's anti-corruption policies and procedures have been communicated to any other persons or organizations.

- d. Total number and percentage of governance body members that have received training on anti-corruption, broken down by region.
- e. Total number and percentage of employees that have received training on anti-corruption, broken down by employee category and region.

### SNC-LAVALIN'S 2021 DISCLOSURE

Please refer to the "Integrity & Human Rights" section of the present report and more specifically to the table titled "Mandatory Courses and Training Initiatives" on p. 70-71.

### 205-3

UNGC PRINCIPLE 10: Anti-corruption  
UN SDG 16 - Anti-corruption

## Confirmed incidents of corruption and actions taken

### REPORTING REQUIREMENTS

- a. Report the total number and nature of confirmed incidents of corruption.
- b. Report the total number of confirmed incidents in which employees were dismissed or disciplined for corruption.
- c. Report the total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption.
- d. Report public legal cases regarding corruption brought against the organization or its employees during the reporting period and the outcomes of such cases.

### SNC-LAVALIN'S 2021 DISCLOSURE

Please refer to the "Integrity & Human Rights" section on p.69 of the present report and to our dedicated webpage at: <https://www.snclavalin.com/en/about/integrity>

## ANTI-COMPETITIVE BEHAVIOR

### 206-1

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UN SDG 16 - Compliance with laws and regulations

### Legal actions for anti-competitive behavior, anti-trust, and monopoly practices

#### REPORTING REQUIREMENTS

- a. Report the total number of legal actions pending or completed during the reporting period regarding anti-competitive behavior and violations of anti-trust and monopoly legislation in which the organization has been identified as a participant.
- b. Report the main outcomes of completed legal actions, including any decisions or judgments.

#### SNC-LAVALIN'S 2021 DISCLOSURE

There were no legal actions pending or completed during the reporting period regarding anti-competitive behavior and/or violations of anti-trust and monopoly legislation in 2021.

## TAX

### 207-1

## Approach to tax

### REPORTING REQUIREMENTS

- a. A description of the approach to tax, including:
  - i. whether the organization has a tax strategy and, if so, a link to this strategy if publicly available;
  - ii. the governance body or executive-level position within the organization that formally reviews and approves the tax strategy, and the frequency of this review;
  - iii. the approach to regulatory compliance;
  - iv. how the approach to tax is linked to the business and sustainable development strategies of the organization.

### SNC-LAVALIN'S 2021 DISCLOSURE

Please see p. 25-26 under "Our Approach to Tax".

### 207-2

## Tax governance, control, and risk management

### REPORTING REQUIREMENTS

- a. A description of the tax governance and control framework, including:
  - i. the governance body or executive-level position within the organization accountable for compliance with the tax strategy;
  - ii. how the approach to tax is embedded within the organization;
  - iii. the approach to tax risks, including how risks are identified, managed, and monitored;
  - iv. how compliance with the tax governance and control framework is evaluated.

- b. A description of the mechanisms for reporting concerns about unethical or unlawful behavior and the organization's integrity in relation to tax.
- c. A description of the assurance process for disclosures on tax and, if applicable, a reference to the assurance report, statement, or opinion.

### SNC-LAVALIN'S 2021 DISCLOSURE

Please see p.26 under "Managing Tax Risks"

### 207-3

## Stakeholder engagement and management of concerns related to tax

### REPORTING REQUIREMENTS

- a. A description of the approach to stakeholder engagement and management of stakeholder concerns related to tax, including:
  - i. the approach to engagement with tax authorities;
  - ii. the approach to public policy advocacy on tax;
  - iii. the processes for collecting and considering the views and concerns of stakeholders, including external stakeholders.

### SNC-LAVALIN'S 2021 DISCLOSURE

Please see p.25-26 under "Our Approach to Tax".

## 207-4

# Country-by-country reporting

## REPORTING REQUIREMENTS

- a. All tax jurisdictions where the entities included in the organization's audited consolidated financial statements, or in the financial information filed on public record, are resident for tax purposes.
- b. For each tax jurisdiction reported in Disclosure 207-4-a:
  - i. Names of the resident entities;
  - ii. Primary activities of the organization;
  - iii. Number of employees, and the basis of calculation of this number;
  - iv. Revenues from third-party sales;
  - v. Revenues from intra-group transactions with other tax jurisdictions;
  - vi. Profit/loss before tax;
  - vii. Tangible assets other than cash and cash equivalents;
  - viii. Corporate income tax paid on a cash basis;
  - ix. Corporate income tax accrued on profit/loss;
  - x. Reasons for the difference between corporate income tax accrued on profit/loss and the tax due if the statutory tax rate is applied to profit/loss before tax.
- c. The time period covered by the information reported in Disclosure 207-4.

## SNC-LAVALIN'S 2021 DISCLOSURE

SNC-Lavalin does not wish to disclose this information at the moment. Consolidated information regarding the amount of taxes paid are disclosed on p. 32 of the present report, under "value distributed".



## MATERIALS

### 301-1

UNGC PRINCIPLE 7: Environment  
UNGC PRINCIPLE 8: Environment  
UN SDG 8 - Materials efficiency

## Materials used by weight or volume

### REPORTING REQUIREMENTS

- a. Report the total weight or volume of materials that are used to produce and package the organization's primary products and services during the reporting period, by:
- › Non-renewable materials used;
  - › Renewable materials used.

### SNC-LAVALIN'S 2021 DISCLOSURE

Services provided by SNC-Lavalin are mainly related to engineering, design and management of construction projects.

Thus, office supplies represent the majority of the material used in providing these services.

SNC-Lavalin currently tracks its global use of electronic equipment and has completed the installation of Ricoh's @Remote software on its multifunction printers in the greater Montréal, Toronto, Calgary and Vancouver areas in order to track its paper use (see subsection titled Squashing the Printing Habit and Reducing Paper Consumption p.49 regarding decrease of paper product use in the last 5 years).

### 301-2

UNGC PRINCIPLE 8: Environment  
UN SDG 8 and 12 - Materials efficiency;  
Materials efficiency/recycling

## Recycled input materials used

### REPORTING REQUIREMENTS

- a. Report the percentage of recycled input materials used to manufacture the organization's primary products and services.

### SNC-LAVALIN'S 2021 DISCLOSURE

As mentioned above, SNC-Lavalin does not produce consumer goods.

Our consulting and engineering services uses primarily paper, IT equipment and other office supplies.

All offices in the major offices of the province of Québec (representing over 2800 employees) uses OFFIX 50, a paper containing 50% post-consumer fibre, manufactured using renewable biogas energy and certified by the Forest Stewardship Council (FSC)<sup>®</sup>. Buying FSC-certified paper counts as a sustainable purchase under the U.S. Green Building Council<sup>®</sup> Leadership in Energy and Environmental Design (LEED<sup>®</sup>) for Existing Building: Operation and Maintenance<sup>TM</sup> rating system.

All PCs and laptops are refurbished in house and reused—often many times— before being disposed of. In 2021, SNC-Lavalin responded to demands for laptop and computers with 63% of used and refurbished computers. It has to be noted that the vast majority of computers purchased are now laptops rather than desktops.

This decision was in part driven by the fact that they have improved capability and a lower energy usage. The latest models selected are also proven to be more energy efficient than the older models. All laptops and desktops are also disposed following specific sustainable certifications.

### 301-3

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UNGC PRINCIPLE 8: Environment

UN SDG 8 and 12 - Resource efficiency of products and services; Resource efficiency of products and services

## Reclaimed products and their packaging materials

### REPORTING REQUIREMENTS

- a. Report the percentage of reclaimed products and their packaging materials for each product category. b. Report how the data for this Indicator has been collected.

### SNC-LAVALIN'S 2021 DISCLOSURE

SNC-Lavalin does not sell products intended for the general public and does not use conventional packaging in any of its activities.

## ENERGY

### 302-1

UN SDG 7, 8, 12 and 13 - Energy efficiency; transport

## Energy consumption within the organization

### REPORTING REQUIREMENTS

- a. Total fuel consumption within the organization from non-renewable sources, in joules or multiples, and including fuel types used.
- b. Total fuel consumption within the organization from renewable sources, in joules or multiples, and including fuel types used.
- c. In joules, watt-hours or multiples, the total:
  - i. electricity consumption
  - ii. heating consumption
  - iii. cooling consumption
  - iv. steam consumption
- d. In joules, watt-hours or multiples, the total:
  - i. electricity sold
  - ii. heating sold
  - iii. cooling sold
  - iv. steam sold
- e. Total energy consumption within the organization, in joules or multiples.
- f. Standards, methodologies, assumptions, and/or calculation tools used.
- g. Source of the conversion factors used.

### SNC-LAVALIN'S 2021 DISCLOSURE

Please see SNC-Lavalin's global energy usage in the "Energy" subsection of the present report starting on p.43. Details regarding the types of fuels used and so on are presented in SNC-Lavalin's Climate Change Report submitted to the CDP at: <https://www.cdp.net/en>

### 302-2

UNGC PRINCIPLE 8: Environment

UN SDG 7, 8, 12 and 13 - Energy efficiency; transport

## Energy consumption outside of the organization

### REPORTING REQUIREMENTS

- a. Energy consumption outside of the organization, in joules or multiples.
- b. Standards, methodologies, assumptions, and/or calculation tools used.
- c. Source of the conversion factors used.

### SNC-LAVALIN'S 2021 DISCLOSURE

Our Climate Change reports are also available on the Web page dedicated to CDP reports at: <https://www.snclavalin.com/en/sustainability/sustainability-report#cdp-reports>

### 302-3

UNGC PRINCIPLE 8: Environment

UN SDG 7, 8, 12 and 13 - Energy efficiency; transport

## Energy intensity

### REPORTING REQUIREMENTS

- a. Report the energy intensity ratio.
- b. Report the organization-specific metric (the ratio denominator) chosen to calculate the ratio.
- c. Report the types of energy included in the intensity ratio: fuel, electricity, heating, cooling, steam, or all.
- d. Report whether the ratio uses energy consumed within the organization, outside of it or both.

## SNC-LAVALIN'S 2021 DISCLOSURE

- a-b.** Please see SNC-Lavalin's global energy and energy intensities in the "Energy" subsection of the present report starting on p.43. Details regarding denominators and so on are presented in SNC-Lavalin's Climate Change Report submitted to the CDP at: <https://www.cdp.net/en> Our Climate Change reports are also available on the Web page dedicated to CDP reports at: <https://www.snclavalin.com/en/sustainability/sustainability-report#cdp-reports>
- c.** All types of energy are included.
- d.** The ratio only uses energy consumed within the organization.

### 302-4

UNGC PRINCIPLE 8: Environment  
UNGC PRINCIPLE 9: Environment  
UN SDG 7, 8, 12 and 13 - Energy efficiency; transport

## Reduction of energy consumption

### REPORTING REQUIREMENTS

- a.** Amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives, in joules or multiples.
- b.** Types of energy included in the reductions; whether fuel, electricity, heating, cooling, steam, or all.
- c.** Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it.
- d.** Standards, methodologies, assumptions, and/or calculation tools used.

## SNC-LAVALIN'S 2021 DISCLOSURE

Please see SNC-Lavalin's global energy and energy intensity reductions in the Energy subsection of the present report starting on p.43, as well as in SNC-Lavalin's Climate Change Report submitted to the CDP at: <https://www.cdp.net/en>

Our Climate Change reports are also available on the Web page dedicated to CDP reports at: <https://www.snclavalin.com/en/sustainability/sustainability-report#cdp-reports>

## 302-5

UNGC PRINCIPLE 8: Environment  
UNGC PRINCIPLE 9: Environment  
UN SDG 7, 8, 12 and 13 - Energy efficiency; transport

## Reductions in energy requirements of products and services

### REPORTING REQUIREMENTS

- a.** Reductions in energy requirements of sold products and services achieved during the reporting period, in joules or multiples.
- b.** Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it.
- c.** Standards, methodologies, assumptions, and/or calculation tools used.

## SNC-LAVALIN'S 2021 DISCLOSURE

SNC-Lavalin does not measure separately its general energy consumption and the energy consumption linked to its service delivery.

Global energy and energy intensity reductions are presented at p.44 of the present report, as well as in SNC-Lavalin's Climate Change Report submitted to the CDP at: <https://www.cdp.net/en>

Our Climate Change reports are also available on the Web page dedicated to CDP reports at: <https://www.snclavalin.com/en/sustainability/sustainability-report#cdp-reports>

## WATER

### 303-1

UNGC PRINCIPLE 7: Environment

UNGC PRINCIPLE 8: Environment

UN SDG 6 - Sustainable water withdrawals

## Interactions with water as a shared resource

### REPORTING REQUIREMENTS

- a. A description of how the organization interacts with water, including how and where water is withdrawn, consumed, and discharged, and the water-related impacts caused or contributed to, or directly linked to the organization's activities, products or services by a business relationship (e.g., impacts caused by runoff).
- b. A description of the approach used to identify water-related impacts, including the scope of assessments, their timeframe, and any tools or methodologies used.
- c. A description of how water-related impacts are addressed, including how the organization works with stakeholders to steward water as a shared resource, and how it engages with suppliers or customers with significant water-related impacts.
- d. An explanation of the process for setting any water-related goals and targets that are part of the organization's management approach, and how they relate to public policy and the local context of each area with water stress.

### SNC-LAVALIN'S 2021 DISCLOSURE

SNC-Lavalin being mostly an engineering consulting firm, water is mainly procured from municipal distribution systems, used in its offices for drinking and domestic purposes and discharged in municipal sewers.

All SNC-Lavalin locations operate in accordance with local legislation. As for controlled project sites, measures are put in place to ensure the protection of surface water. Those measures include sedimentation basins, cofferdams, silt curtains and fences, leak proof concrete washout areas, etc. Such measures are implemented based on the relevant environmental impact assessment (EIA) reports and/or in compliance with local legislation. In 2021, no adverse impact to water bodies has been registered.

Please refer to subsection "Water case studies" starting on p.46 of the present report for case studies regarding our consulting services related to water and the benefits incurred.

### 303-2

UNGC PRINCIPLE 8: Environment

UN SDG 6 - Sustainable water withdrawals

## Management of water discharge-related impacts

### REPORTING REQUIREMENTS

- a. A description of any minimum standards set for the quality of effluent discharge, and how these minimum standards were determined, including:
  - i. how standards for facilities operating in locations with no local discharge requirements were determined;
  - ii. any internally developed water quality standards or guidelines;
  - iii. any sector-specific standards considered;
  - iv. whether the profile of the receiving waterbody was considered.

### SNC-LAVALIN'S 2021 DISCLOSURE

In all office settings, SNC-Lavalin operates in accordance with local legislation and collaborates with building owners who apply voluntary standards (such as BREEAM, LEED®, BOMA Best, etc.) at their properties. It has to be noted that while SNC-Lavalin currently occupies more than 350 offices and buildings, the company only owns 8 properties worldwide and thus, is rarely directly responsible for the water discharge at office locations.

On controlled project sites, SNC-Lavalin implements mitigation measures as required in the Environmental Impact Assessment (EIA) specific to the site. EIAs do consider the profile of the receiving waterbody as well as potential risks to the local fauna and flora. The effectiveness of the implemented measures are monitored and regular reports are communicated to the client and relevant authorities.

### 303-3

UNGC PRINCIPLE 7: Environment

UNGC PRINCIPLE 8: Environment

UN SDG 6 - Sustainable water withdrawals

## Water withdrawal

### REPORTING REQUIREMENTS

- a. Total water withdrawal from all areas in megaliters, and a breakdown of this total by the following sources, if applicable:
  - i. Surface water;
  - ii. Groundwater;
  - iii. Seawater;
  - iv. Produced water;
  - v. Third-party water.
- b. Total water withdrawal from all areas with water stress in megaliters, and a breakdown of this total by the following sources, if applicable:
  - i. Surface water;
  - ii. Groundwater;
  - iii. Seawater;
  - iv. Produced water;
  - v. Third-party water, and a breakdown of this total by the withdrawal sources listed in i-iv.
- c. A breakdown of total water withdrawal from each of the sources listed in Disclosures 303-3-a and 303-3-b in megaliters by the following categories:
  - i. Freshwater ( $\leq 1,000$  mg/L Total Dissolved Solids);
  - ii. Other water ( $> 1,000$  mg/L Total Dissolved Solids).
- d. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.

### SNC-LAVALIN'S 2021 DISCLOSURE

SNC-Lavalin does not measure its global water withdrawal. Water is consumed in its offices and on project sites.

In offices, water is used for drinking and domestic purposes. It has to be noted that less than 1% of the total area we occupy is actually owned by SNC-Lavalin.

The vast majority of offices are rented and thus, SNC-Lavalin has very little control on the installed equipment, such as tenant-specific water meters.

The principle use of water on project sites is for dust control and the production of concrete. Concrete is mostly manufactured off-site and transported to the construction sites. Water for dust control is not considered to be significant.

### 303-4

UNGC PRINCIPLE 8: Environment

## Water discharge

### REPORTING REQUIREMENTS

- a. Total water discharge to all areas in megaliters, and a breakdown of this total by the following types of destination, if applicable:
  - i. Surface water;
  - ii. Groundwater;
  - iii. Seawater;
  - iv. Third-party water, and the volume of this total sent for use to other organizations, if applicable.
- b. A breakdown of total water discharge to all areas in megaliters by the following categories:
  - i. Freshwater ( $\leq 1,000$  mg/L Total Dissolved Solids);
  - ii. Other water ( $> 1,000$  mg/L Total Dissolved Solids).
- c. Total water discharge to all areas with water stress in megaliters, and a breakdown of this total by the following categories:
  - i. Freshwater ( $\leq 1,000$  mg/L Total Dissolved Solids);
  - ii. Other water ( $> 1,000$  mg/L Total Dissolved Solids).



- d. Priority substances of concern for which discharges are treated, including:
  - i. how priority substances of concern were defined, and any international standard, authoritative list, or criteria used;
  - ii. the approach for setting discharge limits for priority substances of concern;
  - iii. number of incidents of non-compliance with discharge limits.
- e. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.

#### SNC-LAVALIN'S 2021 DISCLOSURE

SNC-Lavalin does not measure its global water discharge. As mentioned above, grey and sanitary waters are discharged in municipal sewers or are collected in septic tanks in very few instances.

As for controlled project sites, measures, specific to each site, are put in place to ensure that run off does not have detrimental impacts on surrounding watercourses, but are not measured unless instructed by regulatory or contractual obligations.

#### 303-5

### Water consumption

#### REPORTING REQUIREMENTS

The reporting organization shall report the following information:

- a. Total water consumption from all areas in megaliters.
- b. Total water consumption from all areas with water stress in megaliters.
- c. Change in water storage in megaliters, if water storage has been identified as having a significant water-related impact.
- d. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used, including whether the information is calculated, estimated, modeled, or sourced from direct measurements, and the approach taken for this, such as the use of any sector-specific factors.

#### SNC-LAVALIN'S 2021 DISCLOSURE

As for water withdrawal, SNC-Lavalin does not measure its global water consumption.

## BIODIVERSITY

### 304-1

UNGC PRINCIPLE 8: Environment

UN SDG 6, 14 and 15 - Water-related ecosystems and biodiversity; Marine biodiversity; Mountain ecosystems; Natural habitat degradation; Terrestrial and inland freshwater ecosystems

Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas

#### REPORTING REQUIREMENTS

- a. For each operational site owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas, the following information
  - i. Geographic location;
  - ii. Subsurface and underground land that may be owned, leased, or managed by the organization;
  - iii. Position in relation to the protected area (in the area, adjacent to, or containing portions of the protected area) or the high biodiversity value area outside protected areas;
  - iv. Type of operation (office, manufacturing or production, or extractive);
  - v. Size of operational site in km<sup>2</sup> (or another unit, if appropriate);
  - vi. Biodiversity value characterized by the attribute of the protected area or area of high biodiversity value outside the protected area (terrestrial, freshwater, or maritime ecosystem);

- vii. Biodiversity value characterized by listing of protected status (such as IUCN Protected Area Management Categories, Ramsar Convention, national legislation).

### SNC-LAVALIN'S 2021 DISCLOSURE

Following an assessment in 2017, it was determined that only one SNC-Lavalin owned property was located within 1,000 m. of a protected area, namely the Bosque Oriental de Bogotá, Colombia.

It has to be noted that this property, along with all assets associated with the oil & gas business were sold in the third quarter of 2021.

This assessment was not undertaken in 2021, however, we do not expect any significant changes as SNC-Lavalin did not buy any new facilities through 2021.

### 304-2

UNGC PRINCIPLE 8: Environment

UN SDG 6, 14 and 15 - Water-related ecosystems and biodiversity; Marine biodiversity; Mountain ecosystems; Natural habitat degradation; Terrestrial and inland freshwater ecosystems

Significant impacts of activities, products, and services on biodiversity

#### REPORTING REQUIREMENTS

- a. Report the nature of significant direct and indirect impacts on biodiversity with reference to one or more of the following:
  - > Construction or use of manufacturing plants, mines, and transport infrastructure
  - > Pollution (introduction of substances that do not naturally occur in the habitat from point and non-point sources)
  - > Introduction of invasive species, pests, and pathogens
  - > Reduction of species
  - > Habitat conversion
  - > Changes in ecological processes outside the natural range of variation (such as salinity or changes in groundwater level)

- b. Report significant direct and indirect positive and negative impacts with reference to the following:

- › Species affected
- › Extent of areas impacted
- › Duration of impacts
- › Reversibility or irreversibility of the impacts

## SNC-LAVALIN'S 2021 DISCLOSURE

Although some of SNC-Lavalin's offices and projects are located near or adjacent to protected areas, it is considered that SNC-Lavalin's activities impacts are minimal, if any.

### 304-3

UNGC PRINCIPLE 8: Environment

UN SDG 6, 14 and 15 - Water-related ecosystems and biodiversity; Marine biodiversity; Mountain ecosystems; Natural habitat degradation; Terrestrial and inland freshwater ecosystems

## Habitats protected or restored

### REPORTING REQUIREMENTS

- a. Report the size and location of all habitat protected areas or restored areas, and whether the success of the restoration measure was or is approved by independent external professionals.
- b. Report whether partnerships exist with third parties to protect or restore habitat areas distinct from where the organization has overseen and implemented restoration or protection measures.
- c. Report on the status of each area based on its condition at the close of the reporting period.

- d. Report standards, methodologies, and assumptions used.

## SNC-LAVALIN'S 2021 DISCLOSURE

Although SNC-Lavalin occupies about 350 offices and buildings worldwide, it only owns 8 properties. One such property totaling about 197 hectares, is a former munitions factory, which operated from 1938 to 1990, after which it was decommissioned.

The main legacy environmental issue is a contaminated aquifer. Per the conditions stated in a certificate of authorization issued in 1999 by the Québec Ministry of the Environment, SNC-Lavalin has been implementing a "Pump and treat" program and studies are currently underway to determine how best to increase the scope or pace of treatment.

No significant environmental impact is anticipated on soils and ground water at other company properties.

In addition to this property, SNC-Lavalin has been helping clients, mainly in the mining, military and oil and gas sectors, to restore their sites after the end of their operations.

For instance, in 2021, SNC-Lavalin was still working on the restoration of the Sullivan Mine (200 hectares copper and zinc mine, closed in 1966). The Company also completed detailed engineering and has started the rehabilitation of the Coniagas tailing pond in 2021.

For more information on our mine closure services please consult the following brochure:

<https://www.snclavalin.com/~media/Files/S/SNC-Lavalin/download-centre/en/capability-statement/mine-closure-capability.pdf>

## 304-4

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UNGC PRINCIPLE 8: Environment

UN SDG 6, 14 and 15 - Water-related ecosystems and biodiversity; Marine biodiversity; Mountain ecosystems; Natural habitat degradation; Terrestrial and inland freshwater ecosystems

### IUCN Red List species and national conservation list species with habitats in areas affected by operations

#### REPORTING REQUIREMENTS

- a. Report the total number of IUCN Red List species and national conservation list species with habitats in areas affected by the operations of the organization, by level of extinction risk:
  - > Critically endangered
  - > Endangered
  - > Vulnerable
  - > Near threatened
  - > Least concern

#### SNC-LAVALIN'S 2021 DISCLOSURE

SNC-Lavalin is not aware of any IUCN Red List species that may be affected by its office operations. All project sites are governed by applicable environmental assessment studies and relevant permits which address wildlife protection and conservation issues as required.

## EMISSIONS

### 305-1

UNGC PRINCIPLE 7: Environment

UNGC PRINCIPLE 8: Environment

UN SDG 3, 12, 13, 14 and 15 - Air quality; Transport; GHG emissions; Ocean acidification; Forest degradation

## Direct (Scope 1) GHG emissions

### REPORTING REQUIREMENTS

- a. Gross direct (Scope 1) GHG emissions in metric tons of CO<sub>2</sub> equivalent.
- b. Gases included in the calculation; whether CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub>, or all.
- c. Biogenic CO<sub>2</sub> emissions in metric tons of CO<sub>2</sub> equivalent.
- d. Base year for the calculation, if applicable, including:
  - i. the rationale for choosing it;
  - ii. emissions in the base year;
  - iii. the context for any significant changes in emissions that triggered recalculations of base year emissions.
- e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.
- f. Consolidation approach for emissions; whether equity share, financial control, or operational control.
- g. Standards, methodologies, assumptions, and/or calculation tools used.

### SNC-LAVALIN'S 2021 DISCLOSURE

- a. Our gross direct (Scope 1) GHG emissions in metric tons of CO<sub>2</sub> equivalent are presented in the subsection "Climate" on p.58 of the present report.
- b-e. & g. More detailed information is presented in SNC-Lavalin's 2022 Climate Change report submitted to the CDP at [www.cdp.net](https://www.cdp.net). Our Climate Change reports are also available on our dedicated Web page at: <https://www.snclavalin.com/en/sustainability/sustainability-report#cdp-reports>
- f. Operational control.

### 305-2

UNGC PRINCIPLE 7: Environment

UNGC PRINCIPLE 8: Environment

UN SDG 3, 12, 13, 14 and 15 - Air quality; Transport; GHG emissions; Ocean acidification; Forest degradation

## Energy indirect (Scope 2) GHG emissions

### REPORTING REQUIREMENTS

- a. Gross location-based energy indirect (Scope 2) GHG emissions in metric tons of CO<sub>2</sub> equivalent.
- b. If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO<sub>2</sub> equivalent.
- c. If available, the gases included in the calculation; whether CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub>, or all.
- d. Base year for the calculation, if applicable, including:
  - i. the rationale for choosing it;
  - ii. emissions in the base year;
  - iii. the context for any significant changes in emissions that triggered recalculations of base year emissions.
- e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.
- f. Consolidation approach for emissions; whether equity share, financial control, or operational control.
- g. Standards, methodologies, assumptions, and/or calculation tools used.

### SNC-LAVALIN'S 2021 DISCLOSURE

- a. Our gross location-based energy indirect (Scope 2) GHG emissions in metric tons of CO<sub>2</sub> equivalent are presented in the subsection "Climate" starting on p. 58 of the present report.

- b-e.** More detailed information is presented in SNC-Lavalin's 2022 Climate Change report submitted to the CDP at [www.cdp.net](http://www.cdp.net). Our Climate Change reports are also available on our dedicated Web page at: <https://www.snclavalin.com/en/sustainability/sustainability-report#cdp-reports>
- f.** Operational control.
- g.** More detailed information is presented in SNC-Lavalin's 2022 Climate Change report submitted to the CDP at [www.cdp.net](http://www.cdp.net). Our Climate Change reports are also available on our dedicated Web page at: <https://www.snclavalin.com/en/sustainability/sustainability-report#cdp-reports>

### 305-3

UNGC PRINCIPLE 7: Environment

UNGC PRINCIPLE 8: Environment

UN SDG 3, 12, 13, 14 and 15 - Air quality; Transport; GHG emissions; Ocean acidification; Forest degradation

## Other indirect (Scope 3) GHG emissions

### REPORTING REQUIREMENTS

- Gross other indirect (Scope 3) GHG emissions in metric tons of CO<sub>2</sub> equivalent.
- If available, the gases included in the calculation; whether CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub>, or all.
- Biogenic CO<sub>2</sub> emissions in metric tons of CO<sub>2</sub> equivalent.
- Other indirect (Scope 3) GHG emissions categories and activities included in the calculation.
- Base year for the calculation, if applicable, including:
  - the rationale for choosing it;
  - emissions in the base year;
  - the context for any significant changes in emissions that triggered recalculations of base year emissions.
- Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.

- g.** Standards, methodologies, assumptions, and/or calculation tools used.

### SNC-LAVALIN'S 2021 DISCLOSURE

- Our gross other indirect (Scope 3) GHG emissions in metric tons of CO<sub>2</sub> equivalent are presented in the subsection Climate on p.58 of the present report.
- More detailed information is presented in SNC-Lavalin's 2022 Climate Change report submitted to the CDP at [www.cdp.net](http://www.cdp.net). Our Climate Change reports are also available on our dedicated Web page at: <https://www.snclavalin.com/en/sustainability/sustainability-report#cdp-reports>

### 305-4

UNGC PRINCIPLE 8: Environment

UN SDG 13, 14 and 15 - GHG emissions; Ocean acidification; Forest degradation

## GHG emissions intensity

### REPORTING REQUIREMENTS

- Report the GHG emissions intensity ratio.
- Report the organization-specific metric (the ratio denominator) chosen to calculate the ratio.
- Report the types of GHG emissions included in the intensity ratio: direct (Scope 1), energy indirect (Scope 2) and other indirect (Scope 3).
- Report gases included in the calculation.

### SNC-LAVALIN'S 2021 DISCLOSURE

- Our GHG emissions intensity ratios are presented in the subsection Climate starting on p.58 of the present report.
- More detailed information is presented in SNC-Lavalin's 2022 "Climate" Change report submitted to the CDP at [www.cdp.net](http://www.cdp.net). Our Climate Change reports are also available on our dedicated Web page at: <https://www.snclavalin.com/en/sustainability/sustainability-report#cdp-reports>



## 305-5

UNGC PRINCIPLE 8: Environment

UNGC PRINCIPLE 9: Environment

UN SDG 13, 14 and 15 - GHG emissions;  
Ocean acidification; Forest degradation

## Reduction of GHG emissions

### REPORTING REQUIREMENTS

- a. GHG emissions reduced as a direct result of reduction initiatives, in metric tons of CO<sub>2</sub> equivalent.
- b. Gases included in the calculation; whether CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub>, or all.
- c. Base year or baseline, including the rationale for choosing it.
- d. Scopes in which reductions took place; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3).
- e. Standards, methodologies, assumptions, and/or calculation tools used.

### SNC-LAVALIN'S 2021 DISCLOSURE

Please see SNC-Lavalin's 2022 Climate Change report submitted to the CDP at: [www.cdp.net](http://www.cdp.net)

Our Climate Change reports are also available on our dedicated Web page at:

<https://www.snclavalin.com/en/sustainability/sustainability-report#cdp-reports>

## 305-6

UNGC PRINCIPLE 7: Environment

UNGC PRINCIPLE 8: Environment

UN SDG 3, 12 and 13 - Air quality;  
Transport; GHG emissions

## Emissions of ozone-depleting substances (ODS)

### REPORTING REQUIREMENTS

- a. Production, imports, and exports of ODS in metric tons of CFC-11 (trichlorofluoromethane) equivalent.
- b. Substances included in the calculation.
- c. Source of the emission factors used.

- d. Standards, methodologies, assumptions, and/or calculation tools used.

### SNC-LAVALIN'S 2021 DISCLOSURE

SNC-Lavalin does not produce, import or export any Ozone Depleting substances.

## 305-7

UNGC PRINCIPLE 8: Environment

UN SDG 3, 12, 13, 14 and 15 - Air quality; Transport; GHG emissions; Ocean acidification; Forest degradation

## Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions

### REPORTING REQUIREMENTS

- a. Significant air emissions, in kilograms or multiples, for each of the following:
  - i. NOX
  - ii. SOX
  - iii. Persistent organic pollutants (POP)
  - iv. Volatile organic compounds (VOC)
  - v. Hazardous air pollutants (HAP)
  - vi. Particulate matter (PM)
  - vii. Other standard categories of air emissions identified in relevant regulations
- b. Source of the emission factors used.
- c. Standards, methodologies, assumptions, and/or calculation tools used.

### SNC-LAVALIN'S 2021 DISCLOSURE

Direct and indirect emissions of NO<sub>2</sub> from heating and electricity usage in office buildings are presented Please see SNC-Lavalin's 2022 Climate Change report submitted to the CDP at: [www.cdp.net](http://www.cdp.net)

Our Climate Change reports are also available on our dedicated Web page at:

<https://www.snclavalin.com/en/sustainability/sustainability-report#cdp-reports>

It has to be noted that SNC-Lavalin does not operate fabrication plants or other facilities that would emit air emissions in addition to emissions from heating systems.



## EFFLUENTS AND WASTE

### 306-1

UNGC PRINCIPLE 8: Environment

UN SDG 3, 6, 12 and 14 - Water quality; Sustainable water withdrawals; Water-related ecosystems and biodiversity; Water discharge to oceans

### Water discharge by quality and destination

#### REPORTING REQUIREMENTS

- a. Report the total volume of planned and unplanned water discharges by:
  - > Destination
  - > Quality of the water including treatment method
  - > Whether it was reused by another organization
- b. Report standards, methodologies, and assumptions used.

#### SNC-LAVALIN'S 2021 DISCLOSURE

SNC-Lavalin's water discharges are mainly domestic water which is collected and treated by the municipalities where we operate. All SNC-Lavalin locations operate in accordance with local legislation. As for controlled project sites, measures are put in place to ensure surrounding watercourses are protected.

Those measures include sedimentation basins, cofferdams, silt curtains and fences, leak proof concrete washout areas, etc. Such measures are implemented based on the relevant EIA reports and/or in compliance with local legislation.

### 306-2

UNGC PRINCIPLE 8: Environment

UN SDG 3, 6 and 12 - spills; Waste; Water-related ecosystems and biodiversity

### Waste by type and disposal method

#### REPORTING REQUIREMENTS

- a. Total weight of hazardous waste, with a breakdown by the following disposal methods where applicable:

- i. Reuse
  - ii. Recycling
  - iii. Composting
  - iv. Recovery, including energy recovery
  - v. Incineration (mass burn)
  - vi. Deep well injection
  - vii. Landfill
  - viii. On-site storage
  - ix. Other (to be specified by the organization)
- b. Total weight of non-hazardous waste, with a breakdown by the following disposal methods where applicable:
    - i. Reuse
    - ii. Recycling
    - iii. Composting
    - iv. Recovery, including energy recovery
    - v. Incineration (mass burn)
    - vi. Deep well injection
    - vii. Landfill
    - viii. On-site storage
    - ix. Other (to be specified by the organization)
  - c. How the waste disposal method has been determined:
    - i. Disposed of directly by the organization, or otherwise directly confirmed
    - ii. Information provided by the waste disposal contractor
    - iii. Organizational defaults of the waste disposal contractor

#### SNC-LAVALIN'S 2021 DISCLOSURE

- a. SNC-Lavalin does not compile a global register of hazardous waste and their treatment methods for project sites or offices. However, major project sites maintain such a register and are fully compliant with local legislation when it comes to the storage, management and disposal of hazardous and non-hazardous wastes.
  - i. As part of SNC-Lavalin's nuclear business, one of our sites does have to store radioactive waste before decontamination or proper disposal and prepares a detailed report regarding waste management.

**ii.** Low level radiological solid waste:

- › Plastic/paper/etc.
- › Mixed metal
- › Metal in the form of large tools, which will be decontaminated on site and recycled by 3rd party.

**i.** Low level radiological liquid waste:

- › Water
- › Glycol/water mixed

Note that radiological waste currently stored at this facility was generated over years of operation. Radiological waste is collected until appropriate amount for disposal is reached.

**b.** Not applicable for this facility.

**c.** Solid waste with potential radiological contamination:

- i.** The contaminated items would be decontaminated until they meet the unconditional free release criteria for public domain, the waste then can be disposed as any conventional waste,
- ii.** If the waste items do not meet the unconditional free release criteria, they will be packaged and stored inside the SP3 facility in order for radioactivity to decay or to be transferred to an external CNSC licenced disposal facility.

- › Liquid waste with potential radiological contamination will be collected inside the designated water tanks at the facility.
- › Collected water will be analyzed for chemical and radiological components and will be disposed via sanitary sewer only if it meets the requirements below:
- › The concentration of chemical components is below the limits defined by the regional by-law, and
- › The contribution of radioactive substances to be released within the year remains below the facility Action Level for waterborne Derived Release Limit (DRL). The wastewater will be transferred to an external CNSC licensed disposal facility if any of the conditions above are not met.

**iv.** External CNSC licensed disposal facilities/contractor will potentially use methods below, based on the level of radiological contaminations:

- › Decontaminating and recycling (mostly valid for metal waste)
- › Incineration
- › Evaporation (appropriate for some liquid waste)
- › Long term storage
- v.** Current disposal contractors used at this facility are:
- › Hazardous conventional/non-radioactive waste: Clean Harbors
- › Other radioactive waste: Energy Solution, UniTech

### 306-3

UNGC PRINCIPLE 8: Environment

UN SDG 3, 6, 12, 14 and 15 - spills

## Significant spills

### REPORTING REQUIREMENTS

- a.** Report the total number and total volume of recorded significant spills.
- b.** For spills that were reported in the organization's financial statements, report the additional following information for each such spill:
  - › Location of spill;
  - › Volume of spill;
  - › Material of spill, categorized by:
    - Oil spills (soil or water surfaces);
    - Fuel spills (soil or water surfaces);
    - Spills of wastes (soil or water surfaces);
    - Spills of chemicals (mostly soil or water surfaces); – Other (to be specified by the organization).
- c.** Report the impacts of significant spills.

### SNC-LAVALIN'S 2021 DISCLOSURE

- a.** In 2021, there were no significant environmental incidents, i.e. high potential incidents which caused significant environmental impact or notices of violation.
- b.** No environmental release was reported in the organization's financial statement.
- c.** No impacts to report.

## 306-4

UNGC PRINCIPLE 8: Environment  
UN SDG 3 and 12 - spills; Waste

### Transport of hazardous waste

#### REPORTING REQUIREMENTS

- a. Total weight for each of the following:
  - i. Hazardous waste transported
  - ii. Hazardous waste imported
  - iii. Hazardous waste exported
  - iv. Hazardous waste treated
- b. Percentage of hazardous waste shipped internationally.
- c. Standards, methodologies, and assumptions used.

#### SNC-LAVALIN'S 2021 DISCLOSURE

The company does not export or ship hazardous waste internationally. Very small quantities of hazardous waste are generated in regular office operations (cleaning, maintenance and renovation works). Hazardous waste generated in these activities are transported and disposed of by licensed haulers.

As part of SNC-Lavalin's nuclear business, one of our facilities occasionally transports drums of low-level radioactive wastewater to Energy Solution for treatment and disposal. However, no such transport took place in 2021 as drums are collected and stored adequately over several months of operation before disposal (in comparison, in 2020, 29 drums were disposed of).

Transportation of all radioactive material, whether it is waste or not, is done according to regulation for radioactive material transportation (Class 7). Controlled project sites also generate some hazardous wastes which are managed as per legal requirements in the country of operation.

## 306-5

UNGC PRINCIPLE 8: Environment  
UN SDG 6 and 15 - Water-related ecosystems and biodiversity; Natural habitat degradation; Terrestrial and inland freshwater ecosystems

### Water bodies affected by water discharges and/or runoff

#### REPORTING REQUIREMENTS

- a. Water bodies and related habitats that are significantly affected by water discharges and/or runoff, including information on:
  - i. the size of the water body and related habitat;
  - ii. whether the water body and related habitat is designated as a nationally or internationally protected area;
  - iii. the biodiversity value, such as total number of protected species.

#### SNC-LAVALIN'S 2021 DISCLOSURE

To the best of the company's knowledge, no water bodies or related habitats were significantly impacted by SNC-Lavalin's activities in 2021.

SNC-Lavalin, via its Global Health, Safety and Environment Management System (GHSEMS) prohibits the release of untreated process water or wastewater into the environment at all the facilities it controls.

## ENVIRONMENTAL COMPLIANCE

### 307-1

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UN SDG 16 - Compliance with laws and regulations

### Non-compliance with environmental laws and regulations

#### REPORTING REQUIREMENTS

- a. Significant fines and non-monetary sanctions for non-compliance with environmental laws and/or regulations in terms of:
  - i. total monetary value of significant fines;
  - ii. total number of non-monetary sanctions;
  - iii. cases brought through dispute resolution mechanisms.
- b. If the organization has not identified any non-compliance with environmental laws and/or regulations, a brief statement of this fact is sufficient.

#### SNC-LAVALIN'S 2021 DISCLOSURE

In 2021, no significant fine was imposed on SNC-Lavalin pertaining to environmental non-compliance.



## SUPPLIER ENVIRONMENTAL ASSESSMENT

### 308-1

UNGC PRINCIPLE 8: Environment

#### New suppliers that were screened using environmental criteria

##### REPORTING REQUIREMENTS

- a. Report the percentage of new suppliers that were screened using environmental criteria.

##### SNC-LAVALIN'S 2021 DISCLOSURE

At the time being, SNC-Lavalin does not screen suppliers of material goods using environmental criteria. However, a global Vendor Management System is currently being implemented and SNC-Lavalin intends to apply such criteria starting in the next few years.

On construction projects, the main "suppliers" are contractors. Contractors and sub-contractors are expected to abide by SNC-Lavalin's Global HSE Management System and clauses to that effect are included in all major contracts. When a project is audited against corporate management system compliance, contractors are also audited. In 2021, six such audits were conducted, as well as 32 virtual site visits. The purpose of corporate HSE audits is to validate a site's adherence and compliance to SNC-Lavalin's Global Health Safety and Environment Management System requirements whereas site safety reviews focus primarily on the Critical Risk Control Protocols.

### 308-2

UNGC PRINCIPLE 8: Environment

#### Negative environmental impacts in the supply chain and actions taken

##### REPORTING REQUIREMENTS

- a. Report the number of suppliers subject to environmental impact assessments.
- b. Report the number of suppliers identified as having significant actual and potential negative environmental impacts.
- c. Report the significant actual and potential negative environmental impacts identified in the supply chain.
- d. Report the percentage of suppliers identified as having significant actual and potential negative environmental impacts with which improvements were agreed upon as a result of assessment.
- e. Report the percentage of suppliers identified as having significant actual and potential negative environmental impacts with which relationships were terminated as a result of assessment, and why.

##### SNC-LAVALIN'S 2021 DISCLOSURE

As mentioned above, SNC-Lavalin does not screen product suppliers using environmental criteria.

## EMPLOYMENT

### 401-1

UNGC PRINCIPLE 6: Labour  
UN SDG 5 and 8 - Gender equality;  
Employment; Youth employment

## New employee hires and employee turnover

### REPORTING REQUIREMENTS

- a. Report the total number and rate of new employee hires during the reporting period, by age group, gender and region.
- b. Report the total number and rate of employee turnover during the reporting period, by age group, gender and region.

### SNC-LAVALIN'S 2021 DISCLOSURE

- a. In 2021, SNC-Lavalin hired 5,039 regular employees, representing about 17% of the total workforce. Among them, 3,455 were men and 1,584 (31%) were women;
- b. SNC-Lavalin considers this information to be business sensitive.

### 401-2

UN SDG 8 - Earnings, wages and benefits

## Benefits provided to full-time employees that are not provided to temporary or part-time employees

### REPORTING REQUIREMENTS

- a. Benefits which are standard for full-time employees of the organization but are not provided to temporary or part-time employees, by significant locations of operation. These include, as a minimum:
  - i. life insurance;
  - i. health care;
  - ii. disability and invalidity coverage;
  - iii. parental leave;
  - iv. retirement provision;

- v. stock ownership;
- vi. others.

- b. The definition used for 'significant locations of operation'.

### SNC-LAVALIN'S 2021 DISCLOSURE

SNC-Lavalin does not aggregate this information at the corporate level as this varies regionally in accordance with legislation and business environment. It also has to be noted that the main differences are between regular and temporary employees rather than between full time vs part time employees.

### 401-3

UNGC PRINCIPLE 6: Labour  
UN SDG 5 and 8 - Parental leave

## Parental leave

### REPORTING REQUIREMENTS

- a. Report the total number of employees that were entitled to parental leave, by gender.
- b. Report the total number of employees that took parental leave, by gender.
- c. Report the total number of employees who returned to work after parental leave ended, by gender.
- d. Report the total number of employees who returned to work after parental leave ended who were still employed twelve months after their return to work, by gender.
- e. Report the return to work and retention rates of employees who took parental leave, by gender.

### SNC-LAVALIN'S 2021 DISCLOSURE

At the time being, SNC-Lavalin does not track the relevant metrics in order to properly disclose on this topic.

## LABOR/MANAGEMENT RELATIONS

### 402-1

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UNGC PRINCIPLE 3: Labour

UN SDG 8 - Labor/management relations

### Minimum notice periods regarding operational changes

#### REPORTING REQUIREMENTS

- a. Report the minimum number of weeks' notice typically provided to employees and their elected representatives prior to the implementation of significant operational changes that could substantially affect them.
- b. For organizations with collective bargaining agreements, report whether the notice period and provisions for consultation and negotiation are specified in collective agreements.

#### SNC-LAVALIN'S 2021 DISCLOSURE

- a. Although various situations need to be analysed on a case by case basis, SNC-Lavalin provides sufficient notice to employees prior to making operational changes.

## OCCUPATIONAL HEALTH AND SAFETY

### 403-1

UN SDG 8 - Occupational health and safety

## Occupational health and safety management system

### REPORTING REQUIREMENTS

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

- a. A statement of whether an occupational health and safety management system has been implemented, including whether:
  - i. the system has been implemented because of legal requirements and, if so, a list of the requirements;
  - ii. the system has been implemented based on recognized risk management and/or management system standards/guidelines and, if so, a list of the standards/guidelines.
- b. A description of the scope of workers, activities, and workplaces covered by the occupational health and safety management system, and an explanation of whether and, if so, why any workers, activities, or workplaces are not covered.

### SNC-LAVALIN'S 2021 DISCLOSURE

- a. Back in 2018, SNC-Lavalin adopted an integrated Global Health, Safety and Environment Management System (GHSEMS). All our HSE processes are consolidated into one document referred to as the BlueBook. Updated annually, the BlueBook is consistent with the requirements of the ISO 14001:2015 environmental standard and ISO 45001:2018 occupational health and safety standard.

For more information, please see the subsection titled "Management Systems" on p. 28 of the present report.

- b. The BlueBook is distributed across our organization and to clients and contractors to ensure everyone is working to the same standards and requirements. All SNC-Lavalin employees and controlled sites are covered by the GHSEMS. The GHSEMS oversees contractors HSE plans, programs and

all related policies and procedures and takes precedence in case of conflict. The only exceptions are for workers at clients' facilities or at sites that are not controlled by SNC-Lavalin where HSE expectations are equivalent or exceed that of SNC-Lavalin, in which cases the client's or the partner's system is adhered to.

The BlueBook is available online:

[https://km.snclavalin.com/pdce/Functional/2022-EN-BlueBook\\_\(e-viewing\).pdf](https://km.snclavalin.com/pdce/Functional/2022-EN-BlueBook_(e-viewing).pdf)

### 403-2

UN SDG 8 - Occupational health and safety

## Hazard identification, risk assessment, and incident investigation

### REPORTING REQUIREMENTS

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

- a. A description of the processes used to identify work-related hazards and assess risks on a routine and non-routine basis, and to apply the hierarchy of controls in order to eliminate hazards and minimize risks, including:
  - i. how the organization ensures the quality of these processes, including the competency of persons who carry them out;

- ii. how the results of these processes are used to evaluate and continually improve the occupational health and safety management system.
- b. A description of the processes for workers to report work-related hazards and hazardous situations, and an explanation of how workers are protected against reprisals.
- c. A description of the policies and processes for workers to remove themselves from work situations that they believe could cause injury or ill health, and an explanation of how workers are protected against reprisals.
- d. A description of the processes used to investigate work-related incidents, including the processes to identify hazards and assess risks relating to the incidents, to determine corrective actions using the hierarchy of controls, and to determine improvements needed in the occupational health and safety management system.

#### SNC-LAVALIN'S 2021 DISCLOSURE

Please see section 3.1 "HAZARD IDENTIFICATION, RISK ASSESSMENT AND DETERMINING CONTROLS" on p.20 as well as section 5.3 "INCIDENT INVESTIGATION, NON CONFORMITY AND CORRECTIVE ACTION" on p. 42 of the BlueBook (the Company's HSE Manual), available at: [https://km.snclavalin.com/pdce/Functional/2022-EN-BlueBook\\_\(e-viewing\).pdf](https://km.snclavalin.com/pdce/Functional/2022-EN-BlueBook_(e-viewing).pdf).

#### 403-3

UN SDG 8 - Occupational health and safety

### Occupational health services

#### REPORTING REQUIREMENTS

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

- a. A description of the occupational health services' functions that contribute to the identification and elimination of hazards and minimization of risks, and an explanation of how the organization ensures the quality of these services and facilitates workers' access to them.

#### SNC-LAVALIN'S 2021 DISCLOSURE

Please see SNC-Lavalin's BlueBook (available at: [https://www.snclavalin.com/~media/Files/S/SNC-Lavalin/download-centre/en/policy/blue-book\\_en.pdf](https://www.snclavalin.com/~media/Files/S/SNC-Lavalin/download-centre/en/policy/blue-book_en.pdf)), specifically the section 3.1, titled "HAZARD IDENTIFICATION, RISK ASSESSMENT AND DETERMINING CONTROLS" and section 4.1 titled "ROLES, RESPONSIBILITIES, ACCOUNTABILITY AND AUTHORITY".

In addition, as specified in our HEALTH SURVEILLANCE Standard Operational Procedure, employees working on SNC-Lavalin controlled sites may be exposed to agents in the workplace that may result in harmful effects to their health. For certain agents, the exposure-effect relationship has been sufficiently understood and explained that it is practicable to implement a health surveillance program. Such program may include pre-screening, biological monitoring, health effect monitoring, employee counseling, etc.

It has to be noted that in no case should the results of health surveillance report cause bias against any worker for future employment.

## 403-4

UN SDG 8 - Occupational health and safety

### Worker participation, consultation, and communication on occupational health and safety

#### REPORTING REQUIREMENTS

- a. A description of the processes for worker participation and consultation in the development, implementation, and evaluation of the occupational health and safety management system, and for providing access to and communicating relevant information on occupational health and safety to workers.
- b. Where formal joint management-worker health and safety committees exist, a description of their responsibilities, meeting frequency, decision-making authority, and whether and, if so, why any workers are not represented by these committees.

#### SNC-LAVALIN'S 2021 DISCLOSURE

- a. The development, implementation, and evaluation of the occupational health and safety management system is under the responsibility of SNC-Lavalin's Global HSE team, which compiles and validates the relevancy of all comments received from workers and other stakeholders.
- b. Joint Health and Safety Committees are formed at each SNC-Lavalin site. Local legislation must be referred to for specific guidance on membership requirements and committee responsibilities. There should always be balanced representation between management and workers on the committee to ensure that workers are engaged, consulted and their inputs are addressed in the decision making process. Minutes for each meetings are kept. On Projects / Operations where the size of the workforce or legislation does not require the establishment of such a committee, contractors and SNC-Lavalin communicate HSE related matters to its workforce in Toolbox meetings.

## 403-5

UN SDG 8 - Occupational health and safety

### Worker training on occupational health and safety

#### REPORTING REQUIREMENTS

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

- a. A description of any occupational health and safety training provided to workers, including generic training as well as training on specific work-related hazards, hazardous activities, or hazardous situations.

#### SNC-LAVALIN'S 2021 DISCLOSURE

All SNC-Lavalin employees must follow an induction training upon being hired and when arriving to a new controlled work site. Contractors are also offered a work site specific induction-type training. Upon being hired all SNC-Lavalin employees must also follow a hand safety awareness training e-learning modules.

The eight Critical Risk Control Protocols modules are also to be completed by every applicable SNC-Lavalin employee and by contractors who are on site for more than 30 days. Other specific trainings are given on site, depending on the tasks being performed. Finally, all visitors to any office must watch a 15-minute video summarizing the specific safety features and requirements of the location.

## 403-6

UN SDG 8 - Occupational health and safety

### Promotion of worker health

#### REPORTING REQUIREMENTS

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

- a. An explanation of how the organization facilitates workers' access to non-occupational medical and healthcare services, and the scope of access provided.
- b. A description of any voluntary health promotion services and programs offered to workers to address major non-work-related health risks, including the specific health risks addressed, and how the organization facilitates workers' access to these services and programs.

#### SNC-LAVALIN'S 2021 DISCLOSURE

Since September 2018, all SNC-Lavalin employees have access to an Employee Assistance Program (EAP). Available 24 hours per day, 7 days per week, the program offers a standard, reliable and confidential service to our employees across the world, in 28 languages on the third-party's website and in more than 75 languages through its affiliates. Some of the services offered include:

- › Counselling: provides support for an array of life challenges including, marital, relationship and family issues, stress, anxiety, depression, grief, loss, job pressures and substance abuse.
- › Work-life services: connects employees with specialists who can provide qualified referrals and customized resources for child and elder care, moving, pet care, education planning, selling a house and more.
- › Wellness services: provides tools and resources to help you make positive lifestyle changes including smoking cessation and weight management.

In some jurisdictions, SNC-Lavalin also offers access to virtual health care services and consultation with an ergonomist.

## 403-7

UN SDG 8 - Occupational health and safety

### Prevention and mitigation of occupational health and safety impacts directly linked by business relationships

#### REPORTING REQUIREMENTS

The reporting organization shall report the following information:

- a. A description of the organization's approach to preventing or mitigating significant negative occupational health and safety impacts that are directly linked to its operations, products or services by its business relationships, and the related hazards and risks.

#### SNC-LAVALIN'S 2021 DISCLOSURE

SNC-Lavalin's HSE management approach is a risk based, proactive systematic and is responsive to change. This is accomplished by having sites perform comprehensive risk assessments to ensure all hazards are identified, assessed and evaluated to effectively eliminate and or control risk levels. It consists of a 3-level approach:

The first level is the development of a comprehensive Risk Register to identify the significant risks and their control measures, the second level is the Job Hazard Analysis (JHA) which consists of a comprehensive hazard assessment process intended to standardized, safe and specific methods of work. JHAs shall be conducted in advance for work activities identified in the Risk register and finally the third level consists of the StepBack process which is a guided field-level assessment tool. It prompts SNC-Lavalin personnel and contractors to step back 2 meters and take 2 minutes to think critically about their working environment and to identify how they can get hurt and what they can do about it.



## 403-8

UN SDG 8 - Occupational health and safety

### Workers covered by an occupational health and safety management system

#### REPORTING REQUIREMENTS

The reporting organization shall report the following information:

- a. If the organization has implemented an occupational health and safety management system based on legal requirements and/or recognized standards/guidelines:
    - i. the number and percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by such a system;
    - ii. the number and percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by such a system that has been internally audited;
    - iii. the number and percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by such a system that has been audited or certified by an external party.
  - b. Whether and, if so, why any workers have been excluded from this disclosure, including the types of worker excluded.
  - c. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.
- i. All SNC-Lavalin employees and all (100%) of contractors' employees working on SNC-Lavalin's controlled sites must apply the BlueBook (our HSE manual). In instances where the client's HSE requirements are more stringent than ours, the client's HSE management system takes precedence over that of SNC-Lavalin. Furthermore, on non-controlled sites the system of the partner which is responsible for HSE is implemented, provided it is at least equivalent to ours.
  - ii. The number of employees linked to contractors present on SNC-Lavalin controlled sites changes regularly (sometimes, daily) in accordance with the project's advancement and the tasks being carried out. As such, SNC-Lavalin is not able to provide definitive numbers. However, all contractors present on controlled sites are internally audited.
  - iii. Some sites/business units are certified (ISO 14001 and/or 45001). Such certifications are externally audited as part of the certification process. SNC-Lavalin does not however tally the number of sites targeted by such audits.
- b. No workers excluded.
  - c. No further contextual information to disclose.

## 403-9

UN SDG 3 and 8 - Occupational health and safety

### Work-related injuries

#### REPORTING REQUIREMENTS

The reporting organization shall report the following information:

- a. For all employees:
  - i. The number and rate of fatalities as a result of work-related injury;
  - ii. The number and rate of high-consequence work-related injuries (excluding fatalities);
  - iii. The number and rate of recordable work-related injuries;
  - iv. The main types of work-related injury;
  - v. The number of hours worked.

#### SNC-LAVALIN'S 2021 DISCLOSURE

- a. SNC-Lavalin has implemented an integrated HSE system that is consistent with the requirements of the ISO 14001:2015 environmental standard and ISO 45001:2018 occupational health and safety standard.

- b. For all workers who are not employees but whose work and/or workplace is controlled by the organization:
  - i. The number and rate of fatalities as a result of work-related injury;
  - ii. The number and rate of high-consequence work-related injuries (excluding fatalities);
  - iii. The number and rate of recordable work-related injuries;
  - iv. The main types of work-related injury;
  - v. The number of hours worked.
- c. The work-related hazards that pose a risk of high-consequence injury, including: how these hazards have been determined;
  - i. which of these hazards have caused or contributed to high-consequence injuries during the reporting period;
  - ii. actions taken or underway to eliminate these hazards and minimize risks using the hierarchy of controls.
- d. Any actions taken or underway to eliminate other work-related hazards and minimize risks using the hierarchy of controls.
- e. Whether the rates have been calculated based on 200,000 or 1,000,000 hours worked.
- f. Whether and, if so, why any workers have been excluded from this disclosure, including the types of worker excluded.
- g. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.
- ii. SNC-Lavalin does not keep the number and rate of high consequence work-related injuries. However, SNC-Lavalin keeps track of the lost time incident frequency. For 2021, the number of lost time incidents was 7 (5 for employees; 2 for contractors) and the associated rate was 0.016 (0.014 for employees; 0.025 for contractors) based on 200,000 worked hours.
- iii. For 2021, there were 45 recordable injuries, a Total Recordable of Incident Frequency (TRIF) of 0.10. Specifically for SNC-Lavalin employees it meant 24 incidents and a TRIF of 0.07; while for contractors those numbers were 21 and 0.26, respectively.
- iv. In 2021, 34% of injuries were hand injuries.
- v. 85,143,901 worked hours in 2021.
- c.:
  - i. As described in section 3.1 of the management system of our BlueBook, SNC-Lavalin controlled sites are required to identify all hazards in a risk register and in the Job Hazard Analysis (JHA) prior to commencing work. Then a field level risk assessment (StepBack) is conducted.
  - ii. See a. and b. ii above.
  - iii. SNC-Lavalin's Critical Risk Control Protocols (CRCPs) provide the controls deemed necessary to prevent fatalities, serious incidents and injuries arising from the most common hazards and associated risks encountered by SNC-Lavalin's activities.
- d. In addition to the above mentioned CRCPs, numerous standard operating procedures have been developed such as Traffic Control, Fire Prevention, Wildlife Safety and Working Alone Safety to name a few. Moreover, all injuries are assessed, and corrective actions are implemented as appropriate.
- e. Rates are calculated based on 200,000 hours worked.
- f. No workers have been excluded.
- g. As defined in our BlueBook, under Section 5.1 "5.1 PERFORMANCE MEASUREMENT AND MONITORING" (available at [https://www.snclavalin.com/~media/Files/S/SNC-Lavalin/download-centre/en/policy/blue-book\\_en.pdf](https://www.snclavalin.com/~media/Files/S/SNC-Lavalin/download-centre/en/policy/blue-book_en.pdf)).

## SNC-LAVALIN'S 2021 DISCLOSURE

Please see the Section "Health & Safety" on p. 50 of the present report.

### a.b.:

- i. SNC-Lavalin has had zero fatalities since 2015, either for its own employees or contractors operating on its controlled sites.

## 403-10

UN SDG 8 - Occupational health and safety

### Work-related ill health

#### REPORTING REQUIREMENTS

The reporting organization shall report the following information:

- a. For all employees:
  - i. The number of fatalities as a result of work-related ill health;
  - ii. The number of cases of recordable work-related ill health;
  - iii. The main types of work-related ill health.
- b. For all workers who are not employees but whose work and/or workplace is controlled by the organization:
  - i. The number of fatalities as a result of work-related ill health;
  - ii. The number of cases of recordable work-related ill health;
  - iii. The main types of work-related ill health.
- c. The work-related hazards that pose a risk of ill health, including:
  - i. how these hazards have been determined;
  - ii. which of these hazards have caused or contributed to cases of ill health during the reporting period;
  - iii. actions taken or underway to eliminate these hazards and minimize risks using the hierarchy of controls.
- d. Whether and, if so, why any workers have been excluded from this disclosure, including the types of worker excluded.
- e. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.

#### SNC-LAVALIN'S 2021 DISCLOSURE

At the present moment, SNC-Lavalin does not compile statistics regarding the ill health of employees or contractors. The company has yet to evaluate whether this indicator is material to its business activity.

## TRAINING AND EDUCATION

### 404-1

UNGC PRINCIPLE 6: Labour

UN SDG 4, 5 and 8 - Employee training and education; Gender equality

### Average hours of training per year per employee

#### REPORTING REQUIREMENTS

- a. Report the average hours of training that the organization's employees have undertaken during the reporting period, by:
  - > Gender
  - > Employee category

#### SNC-LAVALIN'S 2021 DISCLOSURE

At the present moment, SNC-Lavalin does not compile statistics regarding the average number of hours of training completed by employees. The company has yet to evaluate whether this indicator is material to its business activity.

### 404-2

UN SDG 8 - Employee training and education

### Programs for upgrading employee skills and transition assistance programs

#### REPORTING REQUIREMENTS

- a. Report on the type and scope of programs implemented and assistance provided to upgrade employee skills.

- b. Report on the transition assistance programs provided to facilitate continued employability and the management of career endings resulting from retirement or termination of employment.

#### SNC-LAVALIN'S 2021 DISCLOSURE

SNC-Lavalin Academy is one of the driving forces for shaping the organization, its direction and future. It is a catalyst and a facilitator of the global strategy deployment. At the SNC-Lavalin Academy, we address corporate-wide development needs, develop key competencies and create an environment that promotes networking, sharing best practices as well as creating alignment and synergies.

### 404-3

UNGC PRINCIPLE 6: Labour

UN SDG 5 and 8 - Gender equality; Employee training and education

### Percentage of employees receiving regular performance and career development reviews

#### REPORTING REQUIREMENTS

- a. Report the percentage of total employees by gender and by employee category who received a regular performance and career development review during the reporting period.

#### SNC-LAVALIN'S 2021 DISCLOSURE

In 2021, virtually all eligible employees received an evaluation. Eligible employees include all Professionals, Managers and Project Managers.

## DIVERSITY AND EQUAL OPPORTUNITY

### 405-1

UNGC PRINCIPLE 6: Labour

UN SDG 5 and 8 - Equal remuneration for women and men; Gender equality; Women in leadership; Diversity and equal opportunity

## Diversity of governance bodies and employees

### REPORTING REQUIREMENTS

- a. Percentage of individuals within the organization's governance bodies in each of the following diversity categories:
  - i. Gender;
  - ii. Age group: under 30 years old, 30-50 years old, over 50 years old;
  - iii. Other indicators of diversity where relevant (such as minority or vulnerable groups).
- b. Percentage of employees per employee category in each of the following diversity categories:
  - i. Gender;
  - ii. Age group: under 30 years old, 30-50 years old, over 50 years old;
  - iii. Other indicators of diversity where relevant (such as minority or vulnerable groups).

### SNC-LAVALIN'S 2021 DISCLOSURE

- a. With respect to the composition of governance bodies, the company has always taken Board diversity into consideration, as it believes such diversity enriches Board discussions by providing a variety of expertise and perspectives, particularly for globally active companies such as SNC-Lavalin. The company is also convinced that diversity in all forms increases the efficiency and effectiveness of the Board and the Board committees.

- i. As of December 31st, 2021, the Board of Directors of SNC-Lavalin was composed of seven men (representing 70% of members) and three women (30%), excluding the President and CEO. As of December 31st, 2021, the company's Leadership Team was composed of 11 men (85%) and two women (15%), including the President and CEO.
- ii. Board of Director age distribution was: Under 30 - 0%; 30-50 - 0%; over 50 - 100%
- iii. Leadership team age distribution: Under 30 - 0%; 30-50 - 8%; over 50 - 92%
- b. Percentage of employees by professional category by December 31st, 2021:
  - i. Workforce by gender: In Executives\* positions: Male - 80%; Female - 20% In Managers & Senior Professional positions: Male - 79%; Female - 21% In All Regular employees: Male - 69%; Female - 31%\*\*

\* Executives comprise members of the Executive Committee and other executives (such as senior vice-presidents and vice-presidents) and senior project managers

\*\* Based on voluntarily disclosed gender by employees. A minority of employees do not wish to disclose such information.

- ii. Workforce by age: In Executives positions: Under 30 - 0%; 30-50 - 41%; over 50 - 59% In Managers & Senior Professional positions: Under 30 - 1%; 30-50 - 56%; over 50 - 43% In Regular employees\*: Under 30 - 20%; 30-50 - 56%; over 50 - 24%

\* At the time of data collection, SNC-Lavalin was missing the date of birth and age of a minority of employees due to either information coming from recently merged legacy systems or recently hired employee who had not completed their on-boarding forms yet.

## 405-2

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UNGC PRINCIPLE 6: Labour

UN SDG 5, 8 and 10 - Equal remuneration  
for women and men

### Ratio of basic salary and remuneration of women to men

#### REPORTING REQUIREMENTS

- a. Report the ratio of the basic salary and remuneration of women to men for each employee category, by significant locations of operation.
- b. Report the definition used for 'significant locations of operation.'

#### SNC-LAVALIN'S 2021 DISCLOSURE

SNC-Lavalin considers this information as business sensitive and does not wish to publish it for the time being.

## NON-DISCRIMINATION

### 406-1

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UNGC PRINCIPLE 6: Labour

UN SDG 5, 8 and 16 - Non-discrimination

## Incidents of discrimination and corrective actions taken

### REPORTING REQUIREMENTS

- a. Report the total number of incidents of discrimination during the reporting period.
- b. Report the status of the incidents and the actions taken with reference to the following:
  - › Incident reviewed by the organization;
  - › Remediation plans being implemented;
  - › Remediation plans have been implemented and results reviewed through routine internal management review processes;
  - › Incident no longer subject to action.

### SNC-LAVALIN'S 2021 DISCLOSURE

Very few allegations of discrimination were brought to the attention of senior management. For those deemed to be founded, remedies have been implemented or are in the process of implementation. A formal reporting process has been developed to facilitate the reporting of incidents, including an integrity hotline operated by an independent third-party service provider.

## FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

### 407-1

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UNGC PRINCIPLE 3: Labour

UN SDG 8 - Freedom of association  
and collective bargaining

Operations and suppliers in  
which the right to freedom  
of association and collective  
bargaining may be at risk

#### REPORTING REQUIREMENTS

- a. Operations and suppliers in which workers' rights to exercise freedom of association or collective bargaining may be violated or at significant risk either in terms of:
  - i. type of operation (such as manufacturing plant) and supplier;
  - ii. countries or geographic areas with operations and suppliers considered at risk.
- b. Measures taken by the organization in the reporting period intended to support rights to exercise freedom of association and collective bargaining.

#### SNC-LAVALIN'S 2021 DISCLOSURE

SNC-Lavalin is not aware of any instances where these rights may have been violated.



## CHILD LABOR

### 408-1

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UNGC PRINCIPLE 5

UN SDG 8 - Abolition of child labor

## Operations and suppliers at significant risk for incidents of child labor

### REPORTING REQUIREMENTS

- a.** Report operations and suppliers considered to have significant risk for incidents of:
  - › Child labour;
  - › Young workers exposed to hazardous work.
- b.** Report operations and suppliers considered to have significant risk for incidents of child labour either in terms of:
  - › Type of operation (such as manufacturing plant) and supplier;
  - › Countries or geographical areas with operations and suppliers considered at risk.
- c.** Report measures taken by the organization in the reporting period intended to contribute to the effective abolition of child labour.

### SNC-LAVALIN'S 2021 DISCLOSURE

Child labour is not permitted at SNC-Lavalin under any circumstances and represents a violation of our Code of conduct and Supplier code of conduct.

## FORCED OR COMPULSORY LABOR

### 409-1

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UNGC PRINCIPLE 4: Labour

UN SDG 8 - Elimination of forced or compulsory labor

### Operations and suppliers at significant risk for incidents of forced or compulsory labor

#### REPORTING REQUIREMENTS

- a.** Report operations and suppliers considered to have significant risk for incidents of forced or compulsory labour either in terms of:
  - › Type of operation (such as manufacturing plant) and supplier;
  - › Countries or geographical areas with operations and suppliers considered at risk.
- b.** Report measures taken by the organization in the reporting period intended to contribute to the elimination of all forms of forced or compulsory labour.

#### SNC-LAVALIN'S 2021 DISCLOSURE

Forced and compulsory labour is a violation of SNC-Lavalin's Code of conduct and Supplier code of conduct. SNC-Lavalin has a zero-tolerance policy pertaining to forced and compulsory labour within its offices and on project sites under its responsibility.

## SECURITY PRACTICES

### 410-1

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UNGC PRINCIPLE 1: Human Rights

Aspect Security Practices

UN SDG 16 - Security

### Security personnel trained in human rights policies or procedures

#### REPORTING REQUIREMENTS

- a. Report the percentage of security personnel who have received formal training in the organization's human rights policies or specific procedures and their application to security.
- b. Report whether training requirements also apply to third party organizations providing security personnel.

#### SNC-LAVALIN'S 2021 DISCLOSURE

SNC Lavalin Global Security continues to work towards meeting the Voluntary Principle on Security and Human Rights (VPSHR) standards. To this end, we have reviewed our global security guard contract to ensure that we include a compliance requirement to the VPSHR.

## RIGHTS OF INDIGENOUS PEOPLES

### 411-1

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UNGC PRINCIPLE 1: Human Rights

Aspect Indigenous Rights

UN SDG 2 - Indigenous rights

### Incidents of violations involving rights of indigenous peoples

#### REPORTING REQUIREMENTS

- a. Report the total number of identified incidents of violations involving the rights of indigenous peoples during the reporting period.
- b. Report the status of the incidents and actions taken with reference to:
  - › Incident reviewed by the organization;
  - › Remediation plans being implemented;
  - › Remediation plans have been implemented and results reviewed through routine internal management review processes;
  - › Incident no longer subject to action.

#### SNC-LAVALIN'S 2021 DISCLOSURE

To the knowledge of the Company, there were no identified incidents in relation to violations of the rights of indigenous peoples in 2021.

## HUMAN RIGHTS ASSESSMENT

### 412-1

UNGC PRINCIPLE 1: Human Rights Aspect Assessment

### Operations that have been subject to human rights reviews or impact assessments

#### REPORTING REQUIREMENTS

- a. Report the total number and percentage of operations that have been subject to human rights reviews or human rights impact assessments, by country.

#### SNC-LAVALIN'S 2021 DISCLOSURE

In 2021, the ad-hoc risk assessments to determine where our operations presented a higher risk of modern slavery were included to our Compliance Risk Assessment ("CRA") process. The CRA is questionnaire-based to determine salient risks. Corrective and preventive measures are discussed with management and implementation is monitored by the Integrity team. The KPI analysis for selecting jurisdictions included the Global Slavery Index.

In addition, we also complete a yearly evaluation of risks related to corruption based on the Transparency International's CORRUPTION PERCEPTIONS INDEX, which includes human rights components.

### 412-2

UNGC PRINCIPLE 1: Human Rights Aspect Investment

### Employee training on human rights policies or procedures

#### REPORTING REQUIREMENTS

- a. Report the total number of hours in the reporting period devoted to training on human rights policies or procedures concerning aspects of human rights that are relevant to operations.

- b. Report the percentage of employees in the reporting period trained in human rights policies or procedures concerning aspects of human rights that are relevant to operations.

#### SNC-LAVALIN'S 2021 DISCLOSURE

Please the subsection titled "Mandatory Courses and Training Initiatives" starting on p.70 of this report.

### 412-3

UNGC PRINCIPLE 2: Human Rights Aspect Investment

### Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening

#### REPORTING REQUIREMENTS

- a. Report the total number and percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening.
- b. Report the definition of 'significant investment agreements' used by the organization.

#### SNC-LAVALIN'S 2021 DISCLOSURE

All SNC-Lavalin's suppliers must abide by our Supplier Code of Conduct (available at: <https://km.snclavalin.com/pdce/Global/supplier-code-of-conduct-en.pdf> which includes a chapter on Human Rights and states that "Suppliers must always: Avoid engaging in activities that encourage human rights abuses, modern slavery, human trafficking, child labor, bonded labor or forced labor, regardless of local legislation and customs".

In 2021, 573 compliance due diligence evaluations were completed. For more information on integrity expectations bestowed on suppliers, please see the Business Partner Compliance Due Diligence subsection on p.72 of the current report as well as our Web page dedicated to Integrity at: <https://www.snclavalin.com/en/about/integrity>

## LOCAL COMMUNITIES

### 413-1

UNGC PRINCIPLE 1: Human Rights  
Aspect: Local Communities

### Operations with local community engagement, impact assessments, and development programs

#### REPORTING REQUIREMENTS

- a. Percentage of operations with implemented local community engagement, impact assessments, and/or development programs, including the use of:
  - i. social impact assessments, including gender impact assessments, based on participatory processes;
  - ii. environmental impact assessments and ongoing monitoring;
  - iii. public disclosure of results of environmental and social impact assessments;
  - iv. local community development programs based on local communities' needs;
  - v. stakeholder engagement plans based on stakeholder mapping;
  - vi. broad based local community consultation committees and processes that include vulnerable groups;
  - vii. works councils, occupational health and safety committees and other worker representation bodies to deal with impacts
  - viii. formal local community grievance processes.

#### SNC-LAVALIN'S 2021 DISCLOSURE

SNC-Lavalin does not carry permanent "operations" other than its office activities. All project sites are, by definition, temporary and their location are determined by clients. In general, SNC-Lavalin is not responsible for community relations for the duration of the project.

However, regardless of our responsibilities we support our clients to create positive relationships with communities and local stakeholders and we have the capacity to complete (social and/or environmental) impact assessments as required by clients (please see our service offering and brochure at <https://www.snclavalin.com/en/markets-and-services/markets/environment-and-geoscience#mod2> for more details).

### 413-2

UNGC PRINCIPLE 1: Human Rights  
Aspect: Local Communities  
UN SDG 1 and 2 - Access to land

### Operations with significant actual and potential negative impacts on local communities

#### REPORTING REQUIREMENTS

- a. Report operations with significant actual and potential negative impacts on local communities, including:
  - > The location of the operations
  - > The significant actual and potential negative impacts of operations

#### SNC-LAVALIN'S 2021 DISCLOSURE

Not material. SNC-Lavalin is mainly an engineering company. As such, activities are either temporary (project sites) or office-based. When project sites are located close to densely populated or urban areas, SNC-Lavalin complies to all law and regulations related to noise, traffic, dust, light, work hours, etc. Grievance mechanisms are in place to find solutions in the rare cases where local population are inconvenienced by the work carried out by our teams.

## SUPPLIER SOCIAL ASSESSMENT

### 414-1

UNGC PRINCIPLE 2: Human Rights Aspect  
Supplier Human Rights Assessment  
UN SDG 5, 8 and 16 - Workplace violence and harassment; Labor practices in the supply chain

### New suppliers that were screened using social criteria

#### REPORTING REQUIREMENTS

- a. Percentage of new suppliers that were screened using social criteria.

#### SNC-LAVALIN'S 2021 DISCLOSURE

At the time being, SNC-Lavalin does not assess the performance of suppliers using social criteria. However, a Vendor Management System is currently being implemented and SNC-Lavalin is assessing the opportunity of including ESG criteria to suppliers' evaluation. In addition, it has to be noted that, as stated on p.4 of our supplier code of conduct (available at: <https://www.snclavalin.com/-/media/Files/S/SNC-Lavalin/download-centre/en/policy/supplier-code-conduct-en.pdf>) all suppliers must confirm in writing that they have read and will abide by said code of conduct.

### 414-2

UNGC PRINCIPLE 2: Human Rights Aspect  
Supplier Human Rights Assessment  
UN SDG 5, 8 and 16 - Workplace violence and harassment; Labor practices in the supply chain

### Negative social impacts in the supply chain and actions taken

#### REPORTING REQUIREMENTS

- a. Number of suppliers assessed for social impacts.
- b. Number of suppliers identified as having significant actual and potential negative social impacts.
- c. Significant actual and potential negative social impacts identified in the supply chain.
- d. Percentage of suppliers identified as having significant actual and potential negative social impacts with which improvements were agreed upon as a result of assessment.
- e. Percentage of suppliers identified as having significant actual and potential negative social impacts with which relationships were terminated as a result of assessment, and why.

#### SNC-LAVALIN'S 2021 DISCLOSURE

At the time being, SNC-Lavalin does not assess the performance of suppliers using social criteria. However, a Vendor Management System is currently being implemented and SNC-Lavalin is assessing the opportunity of including ESG criteria to suppliers' evaluation.

## PUBLIC POLICY

### 415-1

UNGC PRINCIPLE 10: Anti-corruption

UN SDG 16 - Anti-corruption

## Political contributions

### REPORTING REQUIREMENTS

- a. Report the total monetary value of financial and in-kind political contributions made directly and indirectly by the organization by country and recipient/beneficiary.
- b. Report how the monetary value of in-kind contributions was estimated, if applicable.

### SNC-LAVALIN'S 2021 DISCLOSURE

As stated in our Code of Conduct (<http://www.snclavalin.com/en/code-of-ethics>), Compliance Policy (<https://www.snclavalin.com/~media/Files/S/SNC-Lavalin/documents/policies/compliance.pdf>) and Lobbying report (<https://www.snclavalin.com/~media/Files/S/SNC-Lavalin/download-centre/en/report/lobbying-and-political-activities-2021-en.pdf>), political contributions on behalf of SNC-Lavalin, whether at the federal, provincial/state or local level, in Canada or abroad, are prohibited, even in jurisdictions where it is permitted by law.

All SNC-Lavalin personnel, including members of the Board, the CEO, members of the Executive Committee, members of the Senior Management Team, employees (regular, occasional, temporary, contractual, full- or part-time, etc.), consultants and loaned personnel, are forbidden from making political contributions on behalf of the Company, or to use their position to solicit them for the benefit of any political party or candidate in any country. There is no exception to this policy.

Separately, as authorized by the SNC-Lavalin Board and in accordance with relevant U.S. federal and state election laws, Atkins North America makes corporate donations in support of state and local ballot initiatives for infrastructure development and maintenance. These measures are non-partisan in nature and directly approved by the electorate.



## CUSTOMER HEALTH AND SAFETY

### 416-1

#### Assessment of the health and safety impacts of product and service categories

##### REPORTING REQUIREMENTS

- a. Percentage of significant product and service categories for which health and safety impacts are assessed for improvement.

##### SNC-LAVALIN'S 2021 DISCLOSURE

Safety in design is considered by our conception teams for all SNC-Lavalin engineering projects. A Standard Operational Procedure was developed in 2017 and adopted in early 2018. This procedure outlines the methodology used to minimize occupational hazards during the design process, with an emphasis on optimizing HSE throughout the life cycle of materials and process. Safety in design elements were also added to our audit tool in January 2018.

### 416-2

UN SDG 16 - Compliance with laws and regulations

#### Incidents of non-compliance concerning the health and safety impacts of products and services

##### REPORTING REQUIREMENTS

- a. Total number of incidents of non-compliance with regulations and/or voluntary codes concerning the health and safety impacts of products and services within the reporting period, by:
  - i. incidents of non-compliance with regulations resulting in a fine or penalty;
  - ii. incidents of non-compliance with regulations resulting in a warning;
  - iii. incidents of non-compliance with voluntary codes.
- b. If the organization has not identified any non-compliance with regulations and/or voluntary codes, a brief statement of this fact is sufficient.

##### SNC-LAVALIN'S 2021 DISCLOSURE

No incidents of non-compliance concerning the health and safety impacts of products and services to report.

## MARKETING AND LABELING

### 417-1

UN SDG 12 and 16 - Product and service information and labeling; Compliance with laws and regulations

### Requirements for product and service information and labeling

#### REPORTING REQUIREMENTS

- a. Whether each of the following types of information is required by the organization's procedures for product and service information and labeling:
  - i. The sourcing of components of the product or service;
  - ii. Content, particularly with regard to substances that might produce an environmental or social impact;
  - iii. Safe use of the product or service;
  - iv. Disposal of the product and environmental or social impacts;
  - v. Other (explain).
- b. Percentage of significant product or service categories covered by and assessed for compliance with such procedures.

#### SNC-LAVALIN'S 2021 DISCLOSURE

Not material. SNC-Lavalin is mainly an engineering company. As such, we do not deliver "products" to clients, but services. However, SNC-Lavalin does fill specific CDP or GHG emission reports for clients who request it.

### 417-2

UN SDG 16 - Compliance with laws and regulations

### Incidents of non-compliance concerning product and service information and labeling

#### REPORTING REQUIREMENTS

- a. Total number of incidents of non-compliance with regulations and/or voluntary codes concerning product and service information and labeling, by:
  - i. incidents of non-compliance with regulations resulting in a fine or penalty;
  - ii. incidents of non-compliance with regulations resulting in a warning;
  - iii. incidents of non-compliance with voluntary codes.
- b. If the organization has not identified any non-compliance with regulations and/or voluntary codes, a brief statement of this fact is sufficient.

#### SNC-LAVALIN'S 2021 DISCLOSURE

No incidents of non-compliance with regulations and/or voluntary codes concerning product and service information and labeling to report. This criteria is not particularly relevant for a primarily engineering services company with extremely limited exposure to consumer retail activities.

417-3

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## Incidents of non-compliance concerning marketing communications

### REPORTING REQUIREMENTS

- a. Total number of incidents of non-compliance with regulations and/or voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship, by:
  - i. incidents of non-compliance with regulations resulting in a fine or penalty;
  - ii. incidents of non-compliance with regulations resulting in a warning;
  - iii. incidents of non-compliance with voluntary codes.
- b. If the organization has not identified any non-compliance with regulations and/or voluntary codes, a brief statement of this fact is sufficient.

### SNC-LAVALIN'S 2021 DISCLOSURE

No incidents of non-compliance with regulations and/or voluntary codes concerning marketing communications to report.

## CUSTOMER PRIVACY

### 418-1

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UN SDG 16 - Compliance with laws and regulations; Protection of privacy

## Substantiated complaints concerning breaches of customer privacy and losses of customer data

### REPORTING REQUIREMENTS

- a. Report the total number of substantiated complaints received concerning breaches of customer privacy, categorized by:
  - › Complaints received from outside parties and substantiated by the organization;
  - › Complaints from regulatory bodies.
- b. Report the total number of identified leaks, thefts or losses of customer data.
- c. If the organization has not identified any substantiated complaints, a brief statement of this fact is sufficient.

### SNC-LAVALIN'S 2021 DISCLOSURE

- a. No complaints were received in 2021.
- b. To the knowledge of SNC-Lavalin, no customer data was lost or stolen in 2021. SNC-Lavalin ensures the protection of confidential information, particularly clients' intellectual property and employees' personal information. The Company has put in place a number of programs and actively monitors our infrastructures and assets to identify and correct weaknesses.

## SOCIOECONOMIC COMPLIANCE

### 419-1

UN SDG 16 - Compliance with laws and regulations

## Non-compliance with laws and regulations in the social and economic area

### REPORTING REQUIREMENTS

- a. Significant fines and non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area in terms of:
  - i. total monetary value of significant fines;
  - ii. total number of non-monetary sanctions;
  - iii. cases brought through dispute resolution mechanisms.
- b. If the organization has not identified any non-compliance with laws and/or regulations, a brief statement of this fact is sufficient.
- c. The context against which significant fines and non-monetary sanctions were incurred.

### SNC-LAVALIN'S 2021 DISCLOSURE

On September 23, 2021, the Royal Canadian Mounted Police (the "RCMP") represented by the Province of Quebec's Directeur des Poursuites Criminelles et Penales ("DPCP") laid charges against the Company's subsidiary, SNC-Lavalin Inc. and indirect subsidiary, SNC-Lavalin International Inc.

Each entity has been jointly charged (along with a former employee of the Company, Normand Morin) with the following counts: 1) forgery under Section 366 of the Criminal Code (Canada) (the "Criminal Code"), 2) fraud under Section 380 of the "Criminal Code", and 3) fraud against the government under Section 121 of the Criminal Code. Each entity has also been charged with one count of conspiracy to commit the aforementioned crimes (the "Criminal Charges").

On the same date, the "DPCP" gave notice to SNC-Lavalin Inc. and SNC-Lavalin International Inc. of an invitation to negotiate a remediation agreement in accordance with Part XXII.1. of the Criminal Code with respect to the Criminal Charges and on October 1, 2021, both entities formally accepted the invitation.

These Criminal Charges follow the RCMP's formal investigation relating to alleged payments in connection with a 2002 contract for the refurbishment of the Jacques Cartier Bridge by a consortium which included SNC-Lavalin Inc. and which has previously led to a guilty plea on certain criminal charges in 2017 by the former head of the Canada Federal Bridges Corporation.

In addition, SNC-Lavalin has entered in a number of settlement agreements, including in December 2019 with the Public Prosecution Service of Canada (the "PPSC") in connection with charges against the Company and its indirect subsidiaries SNC-Lavalin International Inc. and SNC-Lavalin Construction Inc. under Section 380 of the Criminal Code (Canada) (the "Criminal Code") and Section 3(1)(b) of the Corruption of Foreign Public Officials Act (Canada) (the "Charges"). As part of the PPSC Settlement, SNC-Lavalin Construction Inc. accepted a plea of guilty to a single charge of fraud (the Plea), the Charges were withdrawn and SNC-Lavalin Construction Inc. agreed to pay a fine in the amount of \$280 million, payable in equal installments over 5 years, and to be subject to a three-year probation order.

Further information is available in Note 33 "CONTINGENT LIABILITIES" to the 2021 audited annual consolidated financial statements (p.86-91 of the 2021 Annual Report).