Stantec

September 20, 2024

In order to maintain a consistent standard of Stantec business practices in all jurisdictions in which it conducts business, Stantec, its operating companies, and their directors, officers, and employees shall abide by all applicable laws. The payment of bribes to public officials or others by employees, agents, or representatives of Stantec is prohibited. This includes the offering, promising, authorizing or providing anything of value to any customer, business partner, vendor or other third-party in order to induce or reward the improper performance of an activity connected with our business or our clients. Stantec does not permit cash, discounts, gifts, meals, travel, or entertainment to be offered to anyone (government officials or commercial partners) in exchange for any improper favor or benefit. This prohibition from making corrupt payments also applies to subconsultants and others hired by third parties on the Company's behalf. Soliciting or receiving bribes from others is also prohibited.

Practice

Agents and representatives may be retained only by means of a written agreement that specifies the general obligations of the agent or representative and makes reference to the standards in this policy.

All payments made to agents or representatives should be made against the delivery of a written invoice and pursuant to and in strict accord with the terms of the written agreement.

All agents and representatives must be made known and approved by both

- The general counsel of the Company, who shall be responsible for implementing the execution of the written agreement

- The appropriate officer of the Company required in accordance with the Signing Authority Matrix, who shall be responsible for ensuring that all payments to agents and representatives are properly documented and in accordance with the written agreement

All employees are required to report to the general counsel of Stantec any demands for bribes or illegal payments or inducements by any government official or other individual.