

Code of Business Conduct

May 8, 2024

Policy

Stantec conducts business in accordance with high ethical, moral, and legal standards, and in the best interests of the Company, and its employees, shareholders, and other stakeholders. Stantec maintains business practices that will earn the respect of everyone with whom the Company conducts business.

Practice

The following standards are intended to protect the Company's reputation and the quality of its services.

Compliance Responsibilities

Stantec's Code of Business Conduct is to be strictly followed at all times and under all circumstances. Any violation will subject an employee to disciplinary action up to and including termination.

This Code of Business Conduct applies to all employees and is not intended to be exhaustive. The Code of Business Conduct is intended to serve as a source of guiding principles to ensure all operations and employees approach their work in a consistent and appropriate manner, regardless of location, entity, or job function.

It is vital that employees understand and comply with the Code of Business Conduct as well as recognize their continuing obligations to familiarize themselves with all Company policies and applicable laws that govern the work that we do.

If questions arise about how the Code of Business Conduct applies or how a situation involving an ethical or legal issue should be handled, employees must, without delay, contact corporate c u t l t c.972 (e(ees)-8.1 -13.018 T4 (a



Reputation

The reputation of Stantec is determined by how every employee presents herself or himself and conducts business. Honesty, professionalism, ethical behavior, and integrity when interacting with others are the cornerstones of our reputation and key to our business success. The Company succeeds in the marketplace through superior performance, not by unethical or manipulative practices.

Abiding by the Law

Wherever Stantec operates, it will always comply with applicable laws and regulations. In acting on behalf of Stantec, no employee shall, at any time, take any action which he or she knows or reasonably should know to be in violation of any applicable law or regulation. No unethical or illegal act can be justified by an employee saying that the act was in the best interests of the Company or that he or she was directed to act by a higher level employee. Any time an employee is uncertain about the application or interpretation of a law or regulation, he or she should consult his or her supervisor or seek the opinion of any of the Company's inhouse corporate counsel.

Accurate Books and Records



Work



including prepaid credit cards, checks, etc.) or loans under any any



Inside Information and Insider Trading

During your employment at Stantec, you may sometimes have access to information about the Company and our business partners that is not available to the general public. You are prohibited from buying or selling shares of any company (including Stantec) about which you possess inside information. Information is considered “inside” if it is both material and non-public. Information is “material” if it would reasonably be expected to have a significant effect on the market price or value of the company’s shares if it were made public. Examples of such information include, but are not limited to:

- Financial results
- Projections of future earnings or losses
- Enter





Legal Processes, Investigations, and Audits

Occasionally, the Company may need to respond to inquiries, audits, or investigations imposed by outside entities or government authorities. It is required that employees bring all investigations and audits to the attention of corporate counsel immediately upon receipt of information, indicating that an inquiry, audit, or investigation by any outside entity or any government authority has commenced or is likely to commence and, in any event, prior to engaging with or providing any type of information or response. It is important to remember that penalties and fines can be imposed due to failure to respond, incorrect responses, 9 (nc)-v.3 (f)d[pr]g



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Country	Phone Number	Languages Spoken
Argentina	<p><u>Direct Access</u>: From an outside line, dial the direct access number for your location: Argentina (Argentina Telecom): 0-800-555-4288 Argentina (Telefonica): 0-800-222-1288 At the <i>English</i> prompt, dial 855-389-9170.</p>	Spanish (Latin American), English
Australia	<p><u>International Toll-Free Service (ITFS)</u>: From an outside line, dial the ITFS number for your location: 1-800-79-2097</p>	English
Bahrain	<p><u>Direct Access</u>: From an outside line, dial the direct access number for your location: Bahrain (US military 7(.1B]1.5s)791w 1.925 .0677 t</p>	





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The fact finder and/or general counsel will have access to all relevant information and documents. Employees are required to cooperate with investigations. The fact finder and/or general counsel will complete the investigation and the delivery of the fact-finding report as soon as practicable after the receipt of the complaint.

The Fact-Finding Report

The fact-finding report will concisely summarize all facts and issues learned during the investigation and will offer recommendations. Fact-finding reports respecting complaints material to the affairs of the Company or involving any officer of Stantec Inc. shall be delivered to the chair of the Audit and Risk Committee.

Evaluation of the Fact-Finding Report

The Audit and Risk Committee will

Appendix A
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In no event may a Stantec employee offer entertainment to any government official nor may an employee offer a gift in violation of the recipient's Code of Conduct. Please refer to the *Stantec Code of Business Conduct* and the *Practical Guidance Relating to Gifts, Entertainment and Sponsorships* available on The Lens for further details. If a country is not listed or you have additional questions, please contact IntegrityHotline@stantec.com