

Supply Chain Code of Conduct



Purpose

The Wood Supply Chain Code of Conduct is aligned with the Wood Code of Conduct and together, these documents set out our expectations of our supply chain partners who play an active role in ensuring safe, ethical and sustainable practices.

Scope

Wood requires all of our directors, officers, and employees along with those working on our behalf to comply with all laws and to act ethically and with integrity at all times. Our intent as a supply chain team is to only work with companies who understand and share our commitment to the principles outlined below. Working together we will build a sustainable business relationship that will enable us all to be successful. We require our supply chain partners to adhere to these principles and to reflect these same principles upon their suppliers.

Policy requirements

Health, Safety, Security, Environment and Sustainability (HSSE&S)

Supply chain partners must:

- Comply with all applicable HSSE&S laws, regulations, and industry requirements.
- Where applicable, support Wood in its compliance with sustainability related laws and regulations
- Support, and where applicable, contribute to Wood's target contributions towards the UN Sustainability Development Goals and 'Net Zero' commitment.
- Manage their operations so any potential negative impact to the environment or community is prevented or minimised where unavoidable.
- Provide a safe and healthy work environment for their employees and must provide adequate training, work procedures, and appropriate personal protective equipment. Where transport is provided this must be both clean and safe.
- Provide a workplace that has suitable temperature, ventilation, lighting, and washing and sanitation areas appropriate for both genders. Consideration should be given to physical and mental health and well-being.
- Where accommodation / housing is provided they must be safe, sanitary and meet the basic needs of the workers with regard to space, temperature,

lighting, ventilation, food, water, privacy, affordability, and they must meet or exceed host country housing standards.

- Comply with and promote the Building Responsibly Principles <https://www.building-responsibly.org/> which aspire to be the leading standard on worker welfare for the engineering and construction industry.
- Establish and maintain a management program that drives continual improvement in HSSE&S performance and transparent reporting regarding health, safety and environmental incidents.

Ethics And Legal Requirements

Supply chain partners must:

- Disclose in advance any relationship with any Wood director, officer or employee, or any other person or entity working with Wood that represents or might appear to represent a conflict of interest.
- Conduct business honestly, fairly and free from any bribery or corruption. Comply with all applicable anti-trust, competition laws and the anti-corruption laws including the UK Bribery Act 2010, the Criminal Finances Act 2017, the US Foreign Corrupt Practices Act and any similar local laws. Supply chain partners must also have in place adequate policies and procedures designed to effectively prevent bribery, corruption, fraud, money laundering and facilitation of tax fraud. The highest standards of integrity are expected in all transactions.
- Keep complete, accurate, and reliable records of all matters related to their business with Wood and provide copies of relevant records on request.
- Protect Wood's confidential information and personal data, ensure its security, confidentiality, integrity and availability, and prevent its disclosure, theft, damage or unauthorised use, destruction, access or alteration.
- Notify Wood without undue delay after becoming aware of a personal data breach under the General Data Protection Regulation or other applicable local legislation and support Wood (where required) in its compliance with its legal obligations under all applicable privacy and data protection laws.
- Only engage with employees, contractors, commercial intermediaries, suppliers and other business representatives and partners who act in a way consistent with our shared commitment to ethical business practices and compliance with

laws.

- Only offer appropriate gifts or hospitality in an open and transparent way.
- Comply with all applicable sanctions, export and trade laws and regulations.
- Promote a “speak-up” culture that does not tolerate retaliation.

Supply chain partners must not:

- Develop any relationship with a Wood director, officer, employee, or those working for Wood, whether financial or otherwise, which might conflict, or appear to conflict, with such person’s obligation to act in the best interest of Wood.
- Encourage or allow others to engage in any form of bribery, including the small payments often known as facilitation payments intended to improperly influence someone.
- Engage in tax evasion or facilitate the evasion of tax by any other party.
- Offer any incentive to any Wood director, officer, employee, or such person’s family or friends in order to obtain, retain, or influence Wood business.
- Offer gifts or hospitality which is lavish or inappropriate or which is meant to influence Wood or which could be seen as intending to influence business decisions.
- Offer or supply to Wood a third party’s confidential information or personal data, unless authorised or entitled to do so.

Human Rights and Labour Standards

Supply chain partners must:

- Comply with all applicable labour laws including the Modern Slavery Act 2015 of the United Kingdom and the Australian Modern Slavery Act 2018.
- Set working hours, wages, and overtime pay in compliance with all applicable laws. Workers shall be paid at least the legal minimum wage or a wage that meets local industry standards, whichever is greater. All wages and benefits should be paid in a regular, timely manner in accordance with contractual agreements.
- Wood is a Real Living Wage employer accredited by the Living Wage Foundation. Supply chain partners in the United Kingdom must pay no less than the Real Living Wage to all their employees and contractors when working for Wood.

- Ensure all workers are provided with recruitment agreements and employment contracts in writing as required by applicable laws, in a language understood by them.
- Ensure the work relationship between their workers and their suppliers is freely chosen and free from threats and that all workers are free to have time off, or to leave their employment or work after giving reasonable notice in compliance with all applicable laws.
- Ensure workers always have access to passports and personal documentation, without restriction. Workers shall also have freedom of movement out with normal working hours, unless there are legitimate security or health and safety reasons that threaten the safety or the wellbeing of the worker.
- Comply with all applicable laws regarding harassment and abuse of employees.
- Employ workers on the basis of their ability to perform the job, not discriminating on any basis or status protected by applicable law.
- Respect freedom of association and the right of employees to join a trade union in accordance with applicable laws.
- Have adequate policies and reliable systems in place to prevent the use of illegally or unethically sourced materials, in particular policies and systems to prevent improper procurement of conflict minerals also known as tantalum, tin, tungsten, and gold. Supply chain partners must make every reasonable effort to ensure that their sources are conflict free and be able to provide adequate verification if requested.
- Use recruiters that uphold and respect the standards contained in this Supply Chain Code of Conduct and reflect best practices for recruiting in respect of human rights (including privacy) and labour standards.

Supply chain partners must not:

- Use any child, bonded, forced or involuntary labour in the production of Wood products or services.
- Subject their employees to psychological, verbal, sexual or physical harassment or any other form of abuse.
- Commit, authorise or condone any act of bullying
- Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose or misrepresenting key terms and conditions of

employment, including wages and benefits, the location of work, the living conditions, housing and associated costs, and any significant cost to be charged to the employee, and if applicable, the hazardous nature of the work.

- Use recruiters that do not comply with local labour and any applicable privacy and data protection laws.
- Charge employees for recruitment fees.
- Improperly retain workers' identification documentation.
- Use temporary labour arrangements solely for the purpose of avoiding obligations to the employee under labour or social security laws and regulations arising from the regular employment relationship.

Compliance

Wood reserves the right to assess and monitor suppliers' compliance with this Supply Chain Code of Conduct, whether or not audit rights are contained within relevant supply chain contracts.

Supply chain partners must:

- Comply with the most demanding requirements, whether they are relevant applicable local and national laws and regulations, or the principles set out in this Supply Chain Code of Conduct, in the provision of materials or services to Wood.
- Implement systems and controls to ensure compliance with applicable laws and regulations and the principles set out in this Supply Chain Code of Conduct, including policies, training, monitoring, and auditing mechanisms designed to provide ongoing improvement and assurance of its effectiveness.

- Communicate the principles set out in this Supply Chain Code of Conduct to their suppliers and business partners who may provide goods or services to Wood and mandate compliance as part of their ethical business practices.
- Notify Wood of any alleged potential, suspected or actual breach of the law or the Supply Chain Code of Conduct via our Business Ethics helpline. The Business Ethics helpline is operated by a third-party company and provides telephone reporting lines and an online reporting system through which persons may make reports or raise questions. The helpline is open 24 hours per day, seven days per week and is available in more than 100 languages. The online reporting form and helpline telephone numbers by country can be found here: [EthicsPoint - Wood](#)
- Provide a process for employees to report, without fear of retaliation, activity inconsistent with the content of this Supply Chain Code of Conduct in particular with reference to ethical business conduct, and human and labour rights.

Note: This Supply Chain Code of Conduct contains general requirements applicable to all of Wood's supply chain partners. Supply chain contracts may contain more specific provisions addressing some of the same issues. If there is any inconsistency between this Supply Chain Code of Conduct and any other provision of a particular contract, supply chain partners must comply with whichever provision is more strict. As a general matter, Wood expects supply chain partners to act not just in accordance with the specific provisions of this Supply Chain Code of Conduct, but also in accordance with its spirit.



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