

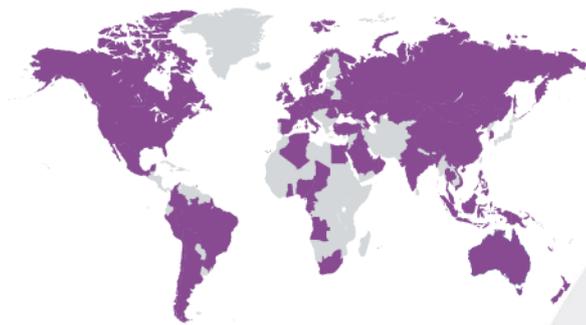
Modern Slavery and Human Trafficking 2019

This statement is made by John Wood Group plc¹ and is made pursuant to the UK Modern Slavery Act 2015 setting out the steps the company has taken to prevent modern slavery across the business and supply chain

Our commitment

Wood is committed to stamping out all forms of modern slavery and human trafficking. We are committed to upholding the Universal Declaration of Human Rights (UDHR), driving these principles throughout our business and supply chain.

About our organisation and supply chain



60,000+ employees 60+ countries 400+ offices

30,000+ suppliers \$4.5bn annual spend on third party materials and services

Wood is a global leader in the delivery of project, engineering and technical services to energy and industrial markets. We operate in more than 60 countries, employing around 60,000 people, with revenues of over \$10 billion. We provide performance-driven solutions across the asset life cycle, from concept to decommissioning across a broad range of industrial markets, including upstream, midstream and downstream oil & gas, power & industrial, environment & infrastructure, clean energy, mining, nuclear and general industrial sectors.

Wood operates throughout the lifecycle of an asset from concept through to decommissioning, working in partnership with our subcontractors and suppliers.

Footnote: See a detailed footnote on final page



Oil & gas



Power & industrial



Environmental & Infrastructure



Mining



Automation

Our supply chain is key to the successful delivery to our clients. Making sure that modern slavery and human trafficking is not part of our supply chain helps us to keep healthy and sustainable relationships.

Our values and code of conduct

During the previous 12 months we launched Wood's values which underpin our Code of Conduct. So much of our success depends on feeling part of a team with people around us that we can rely on. What unites us is our values. They set the tone, help create our culture, give us one common set of principles and are fundamental to ensuring a sustainable business. These values extend through our business into our supply chain.

Care

Working safely, with integrity, respecting and valuing each other and our communities

Commitment

Consistently delivering to all our stakeholders

Courage

Pushing the boundaries to create smarter, more sustainable solutions

At Wood, doing the right thing guides how we work and live. Our Code of Conduct, published in July 2018, helps us meet our ethical and legal commitments ensuring we stay on track when there are questions or situations where the right course of action may be unclear. Specifically, Wood strives to protect and enhance the human dignity of our personnel and everyone who has dealings with our Company. By following the Code, we maintain, strengthen and protect our strong reputation



for adhering to both our values and legislative requirements.

To support our Code of Conduct, in January 2019 we launched our revised [Supply Chain Code of Conduct](#) aligned with our values and principles. We require our supply chain partners to adhere to these principles, formalised in our supply chain contracts and expect them to enforce these same principles upon their suppliers.

Governance

Leadership for human rights issues including modern slavery and human trafficking comes from our Executive Leadership Team (ELT). Informed by our Human Rights and Modern Slavery Steering Committee, this aspect of our business falls within our sustainability programme which steers the committee strategy, influenced by our involvement with the industry led initiative Building Responsibly on worker welfare. The steering committee is tasked with providing effective direction and stewardship over our commitment to identify, prevent, detect and remedy slavery within Wood and our supply chain. Additionally, our sustainability programme is regularly reviewed as part of monthly leadership reporting and



ELT Safety Days, Chaired by our CEO. Setting down Wood's fundamental governance documents has been a priority though 2018 post-acquisition of the Amec Foster Wheeler business. This has given us the opportunity to ensure a consistent approach to human rights across Wood's core governance processes and aligning to Wood's vision and values.

Our [Human Rights policy](#), updated in 2018, documents and affirms Wood's commitment to upholding basic human rights. This policy is supported by global policies that address how Wood conducts business to maintain high standards of ethics and integrity, promoting dignity and respect for how we treat our people and with those we interact.

The updated Wood Code of Conduct and Supplier Code of Conduct released in 2018 builds on heritage documents and guides our approach to business as we continue to harmonise our policies and procedures; whilst key policies and procedures have been updated, this is an ongoing task as we consolidate our management system.

Assessing the Risk of Modern Slavery

At Wood, we recognise that our position as a leader in the delivery of project, engineering and technical services globally creates challenges and risks for the manifestation of human rights and modern slavery issues, that require dedication to identify and mitigate in our operations or of those we work with.

(i) Where we directly employ people, including temporary staff (excluding contractor personnel), Wood exercises the greatest control over employment and working conditions and the risk of modern slavery and/or human trafficking is regarded as low. This is due to the corporate governance processes, policies and procedures which have been reviewed, updated and published during the year. These are aligned with both our Code of Conduct and Human Rights Policy and implemented to ensure that Wood employees have access to rights and conditions in line with the aspects of the UDHR within Wood's sphere of influence, including but not restricted to:

- Equality and anti-discrimination policies
- Right to paid holidays
- Fair pay
- Safety and security
- Fair and just culture

(ii) Our Supply chain

Wood operates in multiple industries across many countries and in many different forms of contractual relationships. Unlike our directly employed personnel, in some cases we have more limited control of our



supply chain. We continue to engage with our supply chain in the following ways:

1. Directly – where we contract directly with and can mandate and require our suppliers and subcontractors and their sub-tiers to meet our Supply Chain Code of standards.
2. Providing Project Management services to our clients – where we manage contractors and other third parties who are contracted by our customers, on their behalf, necessitating a collaborative approach.
3. Procurement services – where we procure on behalf of our customers, necessitating the need to work closely with our customers to build upon their controls and processes.

We recognise the challenges present in combining two large companies and harmonisation of legacy supply chain management systems that ensure continual identification and mitigation of risk from modern slavery and human trafficking. In 2018 we renewed our commitment to ensuring our suppliers adopt the highest ethical standards of operation through the roll out of our Supplier Code of Conduct as well as continual work to consolidate supplier due diligence tools that ensure we retain and enhance human rights components to ensure continuous improvements.

(iii) Areas of heightened risk

Wood has identified that the greatest risk for modern slavery and human trafficking exists in our third-party relationships, where contractors utilise recruitment agencies and labour brokers for the employment of low skilled personnel. This is a particular risk in countries where human rights are not well enshrined into domestic legal frameworks or are applied less vigorously to migrant worker populations.

Wood will ensure that the suppliers falling into these heightened risk areas are identified and monitored as part of our supply chain modern slavery monitoring approach and build on the lessons learned from our heritage organisations to protect worker welfare. Wood is developing a gap analysis tool built upon the Building Responsibly worker welfare principles released in August 2018. We will use this to benchmark our high-risk areas of business.

Due Diligence

Compliance with our Code of Conduct is mandatory for our directors, officers and employees as well as all contractors, consultants, representatives, intermediaries and agents retained by Wood.

Our companywide business ethics hotline provides our personnel means to self-report, in confidence, breaches of our code of conduct, which includes human rights and modern slavery concerns. The hotline is independently operated and available in over 100 languages 24 hours a day, seven days a week in all the countries where we operate.

In our supply chain, where Wood has direct control, we have established due diligence procedures which are designed to assist us in identifying supply chain partner risks and sets out our expectations as a partner. Where we work with our client's supply chain we collaborate to identify and mitigate potential modern slavery and human trafficking, sharing our tools and processes to assist in addressing issues.

In 2018, we continued to take proactive steps to ensure that all recruitment costs are borne by the employer, by investigating and publishing advice to potential employees on bogus offers which seek to elicit monies from candidates. As we continue to integrate our business, we will continue to focus our attention on measures to manage labour agency partners and their supply chains, to ensure they live up to our values and principles, minimising the risk of potential exploitation, particularly around the employment of more vulnerable groups of workers

Training and Capacity Building

In Q4 2018, Wood's annual business ethics online and site-based training campaign focused on our Code of Conduct. The campaign was launched to over 35,000 Wood employees online, with a completion rate for the online campaign of over 90%. In addition, site based, face to face training packs were deployed to approximately 20,000 employees.

Across the course of 2018, our business conducted targeted awareness training on modern slavery and human trafficking to over 240 of our supply chain professionals. As we continue to embed our code of



conduct, supply chain code and further harmonise our policies and procedures we will commit to refresh and regularly review the content within our modern slavery awareness training.

Wood continues its collaboration with Building Responsibly, a business led, business financed initiative focused on improving the rights and welfare of workers in the engineering and construction industry. In 2018 the initiative launched its 10 Worker Welfare Principles; these principles establish a common global baseline for the treatment of workers in the industry and the timely launch of these allowed Wood to ensure the principles were reflected in our key policies and procedures as part of integration and alignment.

Looking ahead

Wood is committed to continually developing our approach to human rights management and seeks to be recognised as a global leader in good practice.

We want to improve the targeting of modern slavery and human trafficking risk areas during the next 12 months and will work closely with our businesses and supply chain managers to do this.

We will implement our worker welfare gap analysis tool and train our operational assurance audit staff to recognise issues as they conduct their work. We will continue to work with Building Responsibly to build capacity, knowledge and understanding of worker welfare issues to drive continuous improvement across our sectors. We will continue to collaborate with clients, partners, peers and industry to enhance our own and wider industry response to human rights issues.

Name Robin Watson
Position Chief Executive
Date 22 April 2019

Footnotes:

1. This statement is applicable to all John Wood Group plc subsidiaries, these include in the UK:

Amec Foster Wheeler Earth and Environmental (UK) Limited
Amec Foster Wheeler Group Limited
Amec Foster Wheeler Limited
Amec Foster Wheeler Energy Limited
Attric Ltd
Energy, Safety and Risk Consultants (UK) Limited
Mustang Engineering Limited
QED International (UK) Limited
Rider Hunt International Limited
SgurrControl Ltd
The Automated Technology Group Limited
Wood Group Industrial Services Ltd
Wood Group UK Ltd
Wood Nuclear Limited

A full list of subsidiaries can be found in our Annual Report and Accounts 2018, available at www.woodplc.com

