

# 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 will guide the manner in which our supply chain partners play an active role in helping us achieve our goals.

## 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 Assurance (HSSEA):

Supply chain partners must:

- Comply with all applicable HSSEA laws, regulations, and industry requirements.
- 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.
- Provide a workplace that has suitable temperature, ventilation, lighting, and washing and sanitation areas appropriate for both genders.
- 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.
- Establish and maintain a management program that drives continual improvement in HSSEA performance and transparent reporting regarding health and safety incidents.

Ethics and legal requirements:

Supply chain partners must:

- Disclose in advance any relationship with a Wood director, officer, employee or person working with Wood that represents or might appear to represent a conflict of interest.
- 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. Partners must also have in place adequate policies and procedures designed to effectively prevent bribery, corruption 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 and prevent its disclosure, theft, damage or unauthorised use.
- Notify Wood without undue delay after becoming aware of a personal data breach under the General Data Protection Regulation or other applicable local legislation.

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.

Human rights and labour standards:

Supply chain partners must:

- Comply with all applicable labour laws.
- 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.

- 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.
- Workers have access to passports and personal documentation at all times. 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 on the basis of their personal characteristics or beliefs (including race, colour, gender, ethnicity, nationality, religion, sexual orientation, age, disability, maternity or marital status).
- Respect freedom of association and the right to collective bargaining. Where the right to freedom of association and collective bargaining is restricted under law, the employer must not hinder the development of parallel means for independent and free association and bargaining.
- 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 only use sources that have been verified as conflict free and provide supporting data on its supply chain for those materials to Wood promptly when requested.
- Use recruiters that uphold and respect the standards contained in this Supply Chain Code and reflect best practices for recruiting in respect of human rights and labour standards.

Supply chain partners must not:

- Use any force, bonded, involuntary prison or child labour.

- Subject their employees to psychological, verbal, sexual, or physical harassment or any other form of abuse.
- 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 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.

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.
- Apply these or similar principles to the supply chain they work with in providing materials and services to Wood.
- 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 a simple email 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 helpline telephone numbers by country and email addresses are located here: <https://www.woodgroup.net/legal/ethics/helpline/Pages/default.aspx>.

- 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. Particular supply chain contracts may contain more specific provisions addressing some of the same issues. To the extent, 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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Date 17 January 2019

