

Modern Slavery and Human Trafficking Statement 2023

This statement is made by John Wood Group PLC and is made pursuant to the UK Modern Slavery Act 2015 and in compliance with the Australian Modern Slavery Act 2018, setting out the steps the company has taken to prevent modern slavery across the business and supply chain.



1. Our commitment

We are a people business. Our long-term vision is to deliver solutions that transform the world to be cleaner, sustainable, safe, secure, faster, ethical, and equitable. Sustainability is not an aspiration but a business imperative – shaping our business, clients, and investment.

Our approach's foundations are built on the UN Global Compact Principles and global Sustainable Development Goals. These form an essential universe in our materiality assessments and their ambitions adopted into our approaches. Authentic, sustainable development means that sustainability principles are weaved into the core structures of our business to form a solid foundation to continue to build our sustainable organisation.

We commit to working to, and promoting the highest standards of Human Rights, ending all forms of slavery, trafficking, and child exploitation. These are fundamental requirements engendered in our governance and central to our values.

As a member of the UN Global Compact, Wood supports the Ten Principles of the UN Global Compact on Human Rights, labour, environment, and anti-corruption. Voluntarily going beyond the Universal Declaration of Human Rights (UDHR), we commit to uphold the Global Compact Principles, including principles 1 and 2, specifically addressing Human Rights:

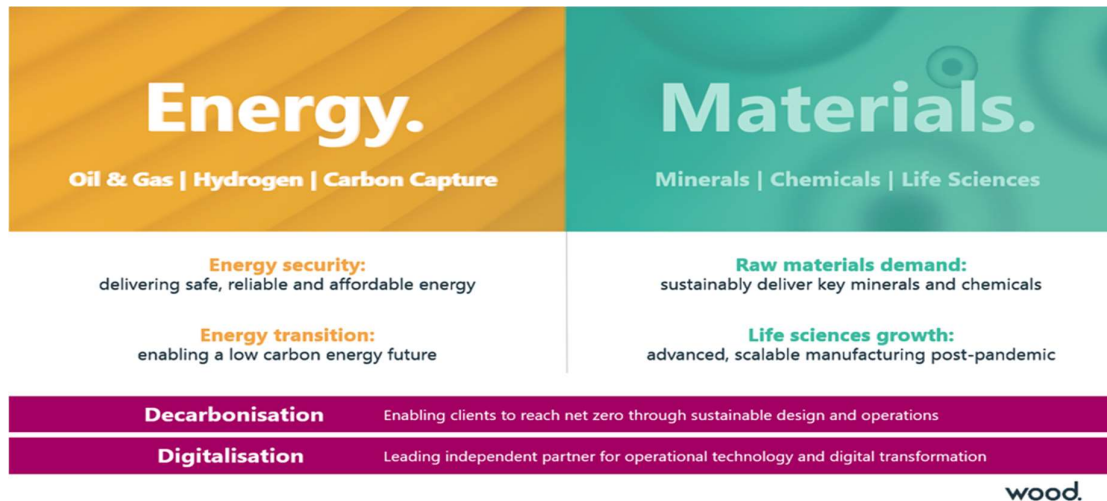
1. Businesses should support and respect the protection of internationally proclaimed Human Rights;
2. Make sure that they are not complicit in Human Rights abuses.

Human Rights abuse has no place in modern society. We continue to look for ways not only to make sure that we address this directly within our sphere of influence but work with our peers and industry bodies to improve standards, drive down risk and raise awareness across our industry; this is evident through our work with the Building Responsibly organisation.

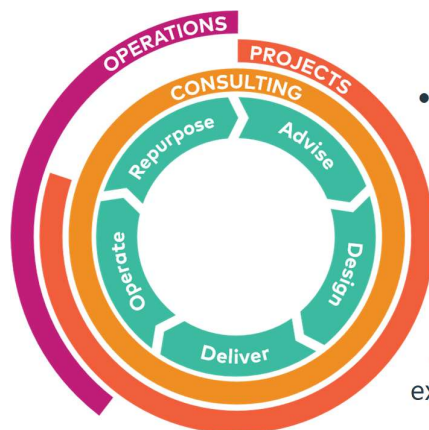
Read more about our work with Building Responsibly [here](#).

2. Our organisational structure

Wood is a UK-listed company and constituent of the FTSE 250 Index, headquartered in Aberdeen, Scotland with over 160 years of history behind us. We operate in more than 60 countries, employing around 36,000 people, with revenues of over \$5.5 billion, delivering services across two broad end markets:



Wood is a global leader in consulting and engineering across the energy and built environments. Our operating model is service-defined to deliver consulting, projects and operational solutions, and we operate in three global business units across those areas.



- **Consulting:** is a global, multi-sector specialist consultancy partner to a wide range of clients across all of energy and the built environment.
- **Projects:** covers all aspects of Conventional Energy, Process & Chemicals and Renewable Energy & Power. Our capital Projects business delivers the best possible return from our client's capital expenditure.
- **Operations:** partners with our clients to optimise their operational expenditure across a wide range of assets.

As a global business of breadth and scale, we work across a multitude of stakeholder and client partnerships, from initial concept and design consultants to heavy civil construction projects. Supporting the work we do, our supply chain is extensive and vital to the delivery of our global portfolio. From consumables to specialist subcontractor activity our supply chain is both complex and vast and essential to the way we operate our business.

Ensuring supply chain relationships are equitable, fair, and free from risk of Human Rights abuses such as modern slavery and human trafficking, is critical to our success, risk management and reputation. Respectful, fair and honest treatment of everyone we work with is a priority for the company, our business is based on relationships, and our values reflect the behaviours we stand for:

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

Sustainability is at the heart of Wood's Strategy and strategic pillars; our sustainability programme is an enabler for us to achieve our strategy.

People: Improve lives

We are committing to respect, nurture and develop the people and places we impact. Creating an **inspired culture** aligned with our values that makes Wood a partner of choice.

Planet: Preserve the environment

Taking responsibility to manage our operations safely, to avoid harm to people and the environment around us. Demonstrating **performance excellence** in how we execute our work, to deliver more sustainable solutions for our clients.

Profit: Deliver sustainable growth

Creating sustained **profitable growth** that meets the needs of our stakeholders, whilst delivering solutions that transform the world.

Read more on our strategy here: [Capital Markets Day 2022 | Wood \(woodplc.com\)](#)

3. Governance and leadership

Supporting our programme of compliance, we continue to develop our policies with input from our in-house experts, suppliers and external stakeholders. Modern slavery and human trafficking risks are managed throughout our governance processes, and we have five mandatory global processes in place relevant to modern slavery, all of which are signed off at the Executive Director level:

Code of Conduct	<p>Sets fundamental expectations for all employees on upholding Human Rights and the Universal Declaration of Human Rights, zero tolerance of abuses of Human Rights, inclusive of modern slavery and human trafficking.</p> <p>In August 2022, the Board of Directors approved an updated version of the Code, which includes new leadership introductions from Roy Franklin, Chair of the Board, Ken Gilmartin, Chief Executive Officer and Martin McIntyre, General Counsel and Company Secretary.</p>
Code of Conduct for Suppliers	<p>Aligned to Wood's Code of Conduct, sets our expectations for suppliers including upholding Human Rights and the Universal Declaration of Human Rights, zero tolerance of abuses of Human Rights, inclusive of modern slavery and human trafficking.</p> <p>In 2022, we rolled out our new supplier code of conduct updated to align with our sustainability goals and expectations for our suppliers to comply with and promote the Building Responsibly Principles.</p>

Sustainability Code of Practice	In 2022 we developed the Code of Practice to support Wood's published sustainability targets. The SCoP includes worker welfare addressing modern slavery issues at the project site, and translating our objectives into tangible actions on Wood projects. The SCoP is a tool to ensure a systematic approach to onsite awareness and monitoring of worker welfare against the Building Responsibly Principles safeguarding against modern slavery.
Human Rights Policy	States our commitment to respect internationally recognised Human Rights in line with the principles and guidance contained in the United Nations (UN) Guiding Principles on Human Rights.
Ethics Hotline	Aimed principally at our colleagues, but also available to others working in our supply chain, customers and the general public. Confidential reporting channels are managed by a third party and concerns can be raised by phone or online in multiple languages.
Business Ethics Reporting and Anti-Retaliation Policy	This policy aims to strengthen our Speak Up culture, ensure, and identify Wood's Speak Up resources; and provide reassurance that you can raise any concerns in good faith without fear of retaliation.

Modern slavery, human trafficking and wider Human Rights abuse are a potential risk to our organisation. In order to manage, mitigate and continually improve, we have spent the last 12 months updating our processes to strengthen our risk-based approach to identify modern slavery and human trafficking within our supply chain. We now have a live watchlist that identifies any "high-risk" suppliers to the business who will be subject to an additional due diligence process with the sustainability team. In the next 12 months, we will continue to train our business partners on the Building Responsibly principles and continue to ask our labour suppliers to embed them within their organisations.

Functional Overview

Supply Chain Function - Supplier Standard	The Supplier Standard details how we manage our governance within the supply chain and is a core and mandatory element of our supply chain management approach. Alongside the Supplier Code of Conduct, the standard unifies our process and expectations for our supply chain teams. The Standard covers not only suppliers in their direct nexus with Wood but extends through to commitments on how they treat their supply chain; it also embeds Building Responsibly principles and support for Wood's sustainability goals.
Commercial Function - Tender Governance	Our tender governance policy is applied globally to provide a consistent approach to reviewing and approving tenders across the Company. The key aims are (i) the management of risk, (ii) the delivery of expected returns in line with budget requirements and (iii) the protection of the business. The review process includes a Human Rights review to ensure that Wood does not contribute to the abuse of Human Rights, including modern slavery and human trafficking.
People and Organisation Function – Human Rights	Wood's people-related policies, procedures and standards are underpinned by our Human Rights Policy and Code of Conduct. Wood's recruitment and hiring procedure seeks to ensure fair and equitable treatment of all employees across the company. Our standards related to the management of employees seek to ensure the company remains free from modern slavery and human trafficking risks, in particular dealing with approved and competent third parties and upholding the principle of 'the employer pays' in terms of recruitment and hiring.

Oversight and leadership

Human Rights, inclusive of modern slavery and human trafficking are of material importance to the company and therefore subject to scrutiny from both the Executive Leadership Team and Safety and Sustainability Board Committee through dedicated sessions:

Safety and Sustainability Committee of the Board	Non-executive chaired committee providing oversight of Wood's management of material ESG matters, sustainability programme and targets and meets quarterly. It reviews and makes recommendations on this statement on behalf of the Board, prior to Board approval. The Committee changed its charter in 2022 to include Sustainability, recognising the increasing importance and profile of Environmental, Social and Governance (ESG) risk, including modern slavery and human trafficking and oversight of the annual modern slavery statement and wider sustainability disclosures.
Executive Leadership Team (ELT)	The Executive President of Business Sustainability and Assurance ensures that material matters including modern slavery are discussed with the Executive Leadership Team and given effective oversight of Wood's sustainability programme. Quarterly engagements with the ELT are used to monitor ESG risk inclusive of Modern Slavery and Human Trafficking and regulatory requirements including this statement.

The President of Sustainability owns the strategic delivery of Wood's sustainability programme, reflecting our long-term vision and approach. In managing the business's response to Human Rights, modern slavery and human trafficking, this role works closely with internal functions, operations, and the broader stakeholder base to ensure we continue to exemplify the commitment to the UN Global Compact.

4. Assessing the risks

Operating in over 60 geographical areas with an extensive supply chain, we must remain vigilant of modern slavery and human trafficking in all our interactions. Wood has well-embedded processes to identify and manage risk across the business; supported by the Head of Risk and our Internal Audit function, we apply a global approach to managing our Human Rights risk register.

As part of our sustainability programme and broader ESG risks oversight, our Human Rights working group acts as the custodian of our register of Human Rights-related risks impacting the company and its operations; they are accountable for identifying, maintaining and ensuring mitigations are actions across the business.

Creating a focus on the risk of modern slavery and human trafficking:

Direct influence

Where we have a direct nexus or sphere of influence in employer/employee relationships, Wood operates robust and effective processes to manage risks in our immediate sphere of influence and practice, representing a lower risk level to the business. (Where the Wood Management System applies).

Indirect influence

Unlike our directly employed personnel, we recognise that third-party labour has more significant potential to give rise to different working conditions and compensation standards, with often limited control over our supply chain. We see the most significant risk of potential Human Rights violations in this area resulting in greater focus from the business to ensure we mitigate. (Where the Wood Management system is not utilised).

Identified as a material risk to Wood's sustainability strategy, we have focused on third-party relationships, where contractors utilise recruitment agencies and labour brokers to employ low-skilled personnel. Our relationships, experience, research and investigations tell us this is where we have the most significant potential risk of modern slavery and human trafficking, and we have the opportunity to improve the welfare of workers.

In addition, we recognise risk in our wider supply network where we procure materials, technology and commodities for use in projects. As a service provider, in many instances, Wood is contractually obliged to work with a client's choice of supplier, with variable influence on procurement decisions; where we can select suppliers, this can often come with restrictions including but not restricted to ensuring certain levels of local spend/content as part of contractual and legal requirement.

Whilst modern slavery and human trafficking can happen anywhere, it 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 is committed to ensuring that suppliers falling into these areas of heightened risk are identified, assessed and monitored as part of our routine supply chain governance and approach to managing the risk from modern slavery and human trafficking.

Read more on Wood's Human Rights issues at: <https://www.woodplc.com/sustainability/people/human-rights>

5. Addressing key risk

Human Rights risks extend across the value chain requiring all parts of Wood to work together to eliminate risk, and we acknowledge that addressing the risk of Human Rights is complex, requiring an interconnected, collaborative approach to ensure we deliver the commitments made in our Code of Conduct. Wood's Human Rights Working Group reflects this in the diverse functional representation, risk register, and cross-discipline governance for Human Rights.

Delivering strong leadership

Leadership is fundamental in ensuring Wood's governance processes are embedded across our operations. We continue to build on our leadership engagement, retaining lessons learned from our ability to connect remotely following the pandemic. Continually advancing our assurance activity as we evolve our approach to assessing Human Rights risks and focus on our evolving risk footprint.

Strengthening our Supply Chain

We continue to work on building and strengthening our management approach to pre-qualification and due diligence of supply chain partners; concurrently, we look to address the scale of our supply chain,

looking for significant consolidation and contraction that will better enable us to screen out 'at risk' suppliers on several factors including Human Rights-based risk.

We partner with those who share our values and seek to deliver a positive impact and drive sustainable growth. Our supplier support hub is continually evolving to provide essential training and support material to help our supply partners meet Wood's expectations.

Explore our supplier support hub at: www.woodplc.com/sustainability/profit/sustainable-procurement

Responsibly managing a migrant workforce

Managing migrant workers not in the direct employment of Wood continues to be a significant risk. Effectively managing worker welfare, particularly the issues of a migrant workforce, is a cross-industry challenge; born from this challenge, our focus to support the Building Responsibly initiative and its 10 Principles for worker welfare seeks to harness the power of partnership and value of cross-industry collaboration. As a founding member of the industry-led, business-financed initiative, we continue to help drive the organisation forward. Building Responsibly forms part of Wood's approach to upholding fundamental Human Rights and the interest of those who work for or on our behalf. We continue to support this as part of the Building Responsibly Steering Committee.



Wood has set firm goals for compliance with the Building Responsibly Principles for us and our supply chain, measured as part of our Sustainability Targets.

The most effective process in managing risk is vigilance. Our employee and supplier base has clear working standards detailed in the Code of Conduct.

Wood has established mechanisms for all stakeholders to raise issues through our Responsible Officers, Ethics and Compliance team or anonymously, if required, through the Ethics hotline. All significant incidents, including allegations of modern slavery and human trafficking, are investigated and we use the Building Responsibly Principles to underpin Human Rights-based allegations.

Learn more on our ethics hotline at: www.woodplc.com/sustainability/profit/responsible-business-practice

Setting sustainability targets

Human Rights are an implicit part of Wood's material sustainability issues, forming an important pillar of our social risk landscape. As part of our sustainability programme, we have initiated a decade of change through targeting improvements which directly respond to global sustainable development goal objectives. In line with our work with Building Responsibly and seeking to address risks in our supply chain we have, as part of our sustainability targets, incorporated worker welfare:

- Ensure 100% of our labour suppliers comply with the Building Responsibly Principles by 2025.
- Ensure 100% of our suppliers have Building Responsibly Principles into their supply chains by 2030.

Our goals are underpinned by a comprehensive delivery strategy and plan. Detailing our progress, we will publish our progress annually through our sustainability reporting process and website.

Access our strategy and learn more about our goals at: <https://www.woodplc.com/sustainability/our-sustainability-goals>

Our sustainability report highlights protecting and enhancing Human Rights as fundamental to a sustainable business. We are committed to stamping out all forms of modern slavery and human trafficking in our business and supply chain and upholding the Universal Declaration of Human Rights (UDHR).

See more information www.woodplc.com/modernslavery

6. Training and capacity building

Keeping our people up to date with their obligations to Wood as part of our Code of Conduct is imperative. Ensuring we remain vigilant, with a duty to report wrong-doing, or suspicion of wrong-doing helps to reinforce a strong ethical culture and stays true to our commitment to always do the right thing.

In 2021, we implemented an integrated training and communication plan comprised of a three-tiered engagement strategy, consisting of influencing, bespoke training, and immersion. We continued to roll out our approach through 2022 into 2023. The plan incorporates a variety of modalities, including live webinars, computer-based training and microlearning videos, as well as communication channels, such as email newsletters, internal social media and a dedicated intranet page regularly refreshed with updated resources. In addition, we work with a third party to anonymously survey employees in specific geographic regions for feedback on Wood's ethical culture. In 2022, this annual survey was distributed to over 5,500 employees in the United States and Canada. High-level survey results were shared with leadership to help improve the culture and direct future training, engagement, and communication efforts.

We continue to build knowledge among our employee networks, taking an integrated approach to Human Rights awareness and capacity building. Our progress in the last 12 months:

Mandatory Ethics Training	<p>In 2022, mandatory computer-based training on anti-bribery and anti-corruption was assigned to nearly 400 individuals in high-risk roles in countries with a Transparency International Corruption Perceptions Index of 40 or below. One hundred per cent completion was attained. During the training period, leaders in these high-risk countries were required to deliver ABAC-related Ethics Moments to their site-based employees, enabling key ethics and compliance messages to reach an additional 4,000 employees.</p> <p>In addition, all participants in Wood's Annual Bonus Plan, the outcomes of which are linked to company performance, are required to complete a Code of Conduct certification.</p>
Code of Conduct for new starters	Code of Conduct computer-based package for new starters, launched through our Oracle People system.
Sustainability Training	General awareness training course outlining key material impacts inclusive of Human Rights and how they affect Wood. A version of this training has now been made available for our suppliers through Wood's new supplier support hub.
Responsible Officer Engagement	Responsible Officers continue to participate in 1-2-1 engagement on all elements of our Code of Conduct.
Supply Chain Awareness	In order to deliver our goals and raise supplier awareness and competence.
Human Rights Awareness	Wood is committed to upholding internationally recognised Human Rights wherever we operate. Our people are our unique fingerprint, and we are responsible for ensuring we protect and enhance Human Rights in all we do as Team Wood. This training ensures our employees know what we mean by Human Rights and what that means within the wood organisation. It also provided insight into Building Responsibly, its worker welfare principles and how we embed in Wood.

Building Responsibly – Supplier Awareness	Wood reached out to all their global labour suppliers and issued them with external Human Rights training, of the 81 suppliers we have engaged with 56 have to date. This was to raise awareness of the building responsibly principles and we plan to extend it out to all suppliers by 2030.
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7. Look ahead

Human Rights, inclusive of modern slavery and human trafficking, form an integral part of Wood’s ESG risk issues to manage. The President of Sustainability role continues to bring a focused level of leadership to Wood’s ESG risk management and is helping to drive continual improvement across all aspects of Wood’s ESG agenda. Upholding and enhancing Human Rights is integral to our success, and Wood remains committed to continually improving standards, not just for the company but across the industry through our association with Building Responsibly

During 2023 we have initiated the implementation of our project-focused Sustainability Code of Practice, this tool focuses on action at our frontline. The Code covers the protection of the frontline migrant workforce through the implementation of Building Responsibly Principles, management of human trafficking and modern slavery as well as broader human rights protections. This Code is designed to support Wood’s approach to UN Global Compact Guiding Principles and support our sustainability objectives and targets.

In the year we have and will continue to evolve our management and monitoring of modern slavery and human trafficking, supported by our internal audit team. Findings are shared across the business and functions and ultimately our Board through the audit committee. The management of Human Rights risks continues to be a priority.

Successively delivering requires strong engagement with our operational teams. The Sustainability Leads across our Business Units connect operations to the sustainability target delivery through an annual tactical program of actions described in the Business Unit / Business Grouping sustainability plan, setting out the role of operations in delivering our sustainability targets and promoting sustainable behavioural change.

Our approach is to steer a course for sustainable development, addressing near-term, medium-term and longer-term steps in our journey. To do this, we must take everyone with us on our journey, identifying and navigating all our key ESG risks and preparing the business to capitalise on the opportunities sustainability offers us. We will do this by putting sustainability at the heart of the company.

Great companies don’t just contribute to their business aims; they are a force for good. In developing our response to sustainability, we put UN Global Compact obligations at the forefront of our thinking. Through our actions, we will support global Sustainable Development Goals (SDGs) and ensure sustainability is at the heart of all critical business decision-making, considering the implications in the long term.

Turning our focus to our supply chain partners, we will continue to evolve our supply chain strategy to deliver our targets. Working in partnership, we aim to continually raise awareness, learn from each other and share best practices on our collective journey to eradicate modern slavery and human trafficking across the value chain.

Name Ken Gilmartin
Position Chief Executive
Date 20 September 2023

Footnotes:

1. This statement was approved by the board of directors on 20 September 2023.
2. This statement applies to all John Wood Group PLC UK and Australian subsidiaries:

Amec Foster Wheeler Australia Pty Ltd
Amec Foster Wheeler Energy Limited
Amec Foster Wheeler Group Limited
Amec Foster Wheeler International Limited
AMEC Services Limited
AMEC Wind Developments Limited
Aus-Ops Pty Ltd
East Mediterranean Energy Services Limited
Foster Wheeler (G.B.) Limited
Innofield Services Pty Ltd
Mustang Engineering Limited
Production Services Network (UK) Limited
PSJ Fabrications Ltd
Rider Hunt International (Australia) Pty Ltd
Rider Hunt International Limited
SVT Holdings Pty Ltd
The Automated Technology Group Limited
Wood Australia Pty Ltd
Wood Group Kenny Limited
Wood Group Kenny UK Limited
Wood Group UK Limited
Wood Transmission and Distribution Limited