

Modern Slavery and Human Trafficking Statement 2022

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.



Revision 1 (Aug 2022)

1. Our commitment

We are a people business. Wood is committed to ensure we continually develop, maintain and enhance the work environment to foster a sense of family and belonging. 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; and**
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 initiative [Building Responsibly](#).

Read more on our work with Building Responsibly at: www.woodplc.com/sustainability/people/human-rights

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 39,000 people, with revenues of over \$6 billion, delivering services across two broad end markets:

- Energy
- Built Environment

Wood is a global leader in consulting and engineering across energy and the built environment. Our operating model is service defined to deliver consulting, projects and operational solutions to help unlock solutions to some of the world's most critical challenges. We are organised into three distinctive global Business Units aligned to our services and capability.

- **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 through 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.

Historically our supply chain has been managed at a regional level. Although this method aligns to local business conditions and provides the benefit of strong regional relationship building, it does present the challenge of a more complex supply chain. As part of Wood’s Future Fit programme, we have initiated a ‘root and branch’ review of our management processes. The objective is to strengthen our management of the supply chain through adopting a more consistent improved enterprise approach to supplier and supply chain management.

Read more on future fit on page 91 of Wood’s Annual Report and Accounts 2021.

Ensuring supply chain relationships are equitable, fair and free from risk to 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, 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

The global pandemic continued to create uncertainty during 2021; however, our awareness and understanding of how to maintain business continuity matured as we continued to adapt and evolve to the pandemic and improve our business resilience. The imposition of tough restrictions cut across our ability to travel and impacted our traditional methods of assurance assessment; finding new and innovative ways to conduct assurance activity was a key focus for the business, as we dealt with the inability to conduct important face-to-face contact.

Read more on assurance and our efforts to addressing risk in section 5.

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 several mandatory global processes in place relevant to modern slavery, all of which are signed off at Executive Director level:

Code of Conduct	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.
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 2021, our supplier code of conduct was updated to align with our sustainability goals and expectations for our suppliers to comply with and promote the Building Responsibly Principles.</p>
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. Confidential reporting channels are managed by a third party and concerns can be raised by phone or online in multiple languages.
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We regard modern slavery and human trafficking, and wider human rights abuse as a significant risk to our organisation, which must be managed in all that we do. Through the course of the year, we have continued to review, update and develop our processes; in particular, Wood’s Future Fit programme has initiated a wide-ranging review of our organisational structure and business management systems, to ensure a more joined up, holistic approach throughout the organisation. Due to conclude in 2022, we will continue to build on this progress over the course of the next 12 months.

Functional overview

Supply Chain Function - Supplier Standard	Governance of our supply chain is set out in our Supplier Standard, a core and mandatory element of our supply chain management approach. Alongside the Supplier Code of Conduct, the standard unifies our approach and expectation for our supply chain teams. The standard covers not only suppliers in their direct nexus with Wood but extending through to commitments on how they treat their supply chain. In 2021 our supplier standard was updated to embed the Building Responsibly principles and support for Wood’s sustainability goals. The Standard is supported by a suite of tools inclusive of a due diligence tracker and educational pack for our supply chain team to draw upon. To increase transparency, we have continued to develop our Supply Chain dashboard which tracks due diligence activity monthly.
Commercial Function - Tender Governance	Our tender governance policy is applied globally to provide a consistent approach to the review and approval of 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 is inclusive of a human rights review to ensure that Wood does not contribute to the abuse of human rights, inclusive of modern slavery and human trafficking.
People and Organisation Function – Human Rights	Wood’s human resources 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 oversight of Wood’s management of material ESG matters, sustainability programme and targets and meets quarterly. Reviews and makes recommendations on this statement on behalf of the Board prior to Board sign-off. The Committee changed its charter during the last year to include Sustainability, recognising the increasing importance and
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	profile of Environmental, Social and Governance (ESG) risk, including modern slavery and human trafficking and oversight of this annual modern slavery statement and wider sustainability disclosures.
Executive Leadership Team (ELT) Safety and Sustainability Day	Full Executive Leadership Team oversight of Wood’s sustainability programme, substantive discussion of material risks – inclusive of modern slavery and human trafficking. Oversees management of ESG risk inclusive of Modern Slavery and Human Trafficking and regulatory requirements including this statement.

Strategic delivery of Wood’s sustainability programme is owned by the President of Sustainability. The appointment was made as part of Wood’s Future Fit programme, reflecting the importance of sustainability to Wood’s long-term future. Managing the business’s response to human rights, modern slavery and human trafficking, this role works closely with internal functions and operations and the wider stakeholder base, to ensure we continue to exemplify the commitment laid down in 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 already operates well developed processes to identify and manage risk across the business. Supported by the Head of Risk and our Internal Audit Function, we have used the Group approach to establish our human rights risk register.

As part of our sustainability programme and wider ESG risks oversight, our established Human Rights working group is the custodian for Wood’s human rights risk register, development and update.

Creating Focus on the risk from modern slavery and human trafficking:



Direct influence

Where we have direct nexus or sphere of influence in employer/employee relationships. Wood operates robust and effective processes to manage risks in our direct sphere of influence, and in practice we believe this represents a lower level of risk to the business.



In-direct influence

We recognise that third party labour, unlike our directly employed personnel, has greater potential to give rise to differing standards in working conditions and compensation, with often limited control over our supply chain. This is an area of greater focus for the business and where we see the greatest risk to the potential violation of human rights.

Identified as a material risk to Wood’s sustainability strategy, we have prioritised focus on third-party relationships, where contractors utilise recruitment agencies and labour brokers for the employment of low skilled personnel. Our relationships experience, research and investigations tells us this is where we have the greatest potential risk of modern slavery and human trafficking, and we have 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/or 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 refreshed materiality assessment at: www.woodplc.com/sustainability/materiality

5. Addressing key risk

We recognise that addressing the risk of human rights is complex, and requires an interconnected, collaborative approach across Wood to coalesce around the promises made in our Code of Conduct. Human Rights risks extend across the value chain requiring all parts of Wood to work together to eliminate risk. This is reflected in the diverse functional representation on our Human Rights Working Group and captured in our risk register and cross-discipline governance for human rights.

Delivering strong leadership

Our leadership is fundamental in ensuring Wood's governance processes are embedded across our operations. In 2021 we initiated the start of a recovery from the global pandemic, opening up our operations and emerging from those disruptions impacting our projects, supply chain and relationships. Retaining lessons learned from our ability to connect remotely, despite restrictions on physical site visits we exceeded our leadership engagement target with 1,552 engagement visits conducted in 2021. We will continue to improve assurance activity as we evolve our approach to assessing human rights risks and focus on our evolving risk footprint.

Strengthening our Supply Chain

In 2021, following considerable organisational change as a result of our Future Fit programme, our efforts during the year focused on the development of a supply chain strategy for delivery of our targets around the Building Responsibly Worker Welfare Principles, this included:

- Developing a consistent definition of 'labour supplier'
- Analysing specific worker welfare risks to develop a profile of our highest priority labour suppliers to better target our engagement
- Initiating the revision of supplier governance rules, prequalification and monitoring which will be completed in 2022
- Conducting a series of workshops with an external consultancy support to identify potential barriers to the implementation of the principles

- Updating our Supplier Code of Conduct to embed the principles and updating the modern slavery guidance we provide to suppliers.

We will continue work on building and strengthening our management approach to pre-qualification and due diligence of supply chain partners, having already refreshed our standards and work on an enterprise approach to pre-qualification to move away from a regional approach. Concurrently we will 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 a number of factors including human rights-based risk.

We choose to partner with those that share our values and seek to deliver positive impact and drive sustainable growth. We are currently developing our supplier support hub intended to deliver key 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, especially where they are not in direct employment of Wood continues to be a significant risk to our business. Effectively managing worker welfare, and in particular the issues a migrant workforce presents 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. Promoting the rights and welfare of workers, specifically for those in the engineering and construction industry, the initiative is part of Wood's approach to uphold basic human rights and welfare of those that work for, or on our behalf. Our membership and continued contribution to the collaboration was recognised by members voting Wood onto the Building Responsibly Steering Committee in June 2021. Addressing our most vulnerable workers, Wood has set firm goals for compliance with the Building Responsibly Principles, for ourselves and our supply chain.



Read more about our goals at: www.woodplc.com/sustainability/our-sustainability-goals

The most effective process in managing risk is vigilance. Our employee and supplier base has clear standards to work to, in the Code of Conduct. Wood has established mechanisms for all stakeholders to raise issues to the company 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 – 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 on our goals at: www.woodplc.com/sustainability/strategy-and-goals

6. Training and capacity building

Keeping our people up to date with their obligations to Wood as part of our Code of Conduct is an 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, with initial emphasis on influencing, through foundational communications, and bespoke training. In 2022 we will move into the immersion tier of the strategy by promoting awareness of key ethics and compliance (E&C) issues to site-based employees. In addition, Wood continues to work with a third party to anonymously survey employees in specific geographic regions for feedback on Wood’s ethical culture. In 2021, this annual survey was distributed to over 3,500 employees in the Asia Pacific region. The survey results are helping to set training and communication priorities in 2022 and beyond.

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 12months:

Code of Conduct Training	100% of the target group (4,600 people) completed mandatory ethics training designed to drive everyday ethical decision making and position learners as local champions of core E&C messages, enabling them to initiate conversations about conducting business with integrity and promoting a “Speak Up” culture. 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.
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 Training	Responsible Officers continue to receive 1-2-1 training on all elements of our Code of Conduct and its application to the business.

Supply Chain Awareness	Refreshed Supplier Standards links to a resource’s awareness pack on human rights available to our Supply Chain function members. Wood’s supply chain team is also engaging with suppliers to embed Supplier Relationship Management (SRM) tools and processes to help support delivery of our goals and raise supplier awareness and competence.
Human Rights Awareness	Wood is working with Building Responsibly to develop training resources to support members implement the Worker Welfare Principles. This also includes sharing Wood’s own training resources on human rights issues with the wider member base.

Complimenting formal training are a number of lunch and learn activities, webinars, newsletter and intranet-based resources which are aimed at improving knowledge and skills across the organisation.

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 more 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.

Wood continues to reference ESG strategy and performance as a principal risk to our business. Supported by our internal audit team, our efforts to continually assure the management of human rights risks continues to be a top priority. Our Human Rights Working Group remains integral in working across Wood’s multiple stakeholders to identify opportunities for improvement and evolving management of our human rights risk register.

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

Name Ken Gilmartin
 Position Chief Executive
 Date 16 August 2022

Footnotes:

1. This statement was approved by the board of directors on the 16th August 2022.
2. This statement is applicable to all John Wood Group plc UK and Australian subsidiaries:

Amec Foster Wheeler Earth and Environmental (UK) Limited
Amec Foster Wheeler Group Limited
Amec Foster Wheeler Limited
Amec Foster Wheeler Energy Limited
Mustang Engineering Limited
QED International (UK) Limited
Rider Hunt International Limited
SgurrControl Ltd
The Automated Technology Group Limited
Wood Group Production Services (UK) Ltd
Wood Group UK Ltd
Aus-Ops Pty Ltd
Innofield Services Pty Ltd
Rider Hunt International (AUSTRALIA) Pty Ltd
Wood Australia Pty Ltd