

# Modern Slavery and Human Trafficking



**This statement is made by John Wood Group plc 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**



## About the organisation

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 57,000 people, with revenues of over \$10 billion. We provide performance-driven solutions throughout the asset life cycle, from concept to decommissioning across a broad range of industrial markets including upstream, midstream and downstream oil & gas, chemicals, environment and infrastructure, power and process, clean energy, mining, nuclear and general industrial sectors.

## Acquisition of Amec Foster Wheeler

On the 6th October 2017 John Wood Group plc purchased Amec Foster Wheeler plc to create Wood. The company has embarked on a harmonisation of policy and procedure across the heritage entities of Wood Group and Amec Foster Wheeler. For the purposes of business continuity the company is operating with heritage processes and policies which are undergoing harmonisation on a risk led basis, this enables the company to continue to operate within a well-defined operating system.

## 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. We care that our actions should not deprive others of their lawful rights to freedom and liberty and we will take measures to make sure that this is the case through our company policies, procedures and relationships.

## Risk review

Modern slavery and human trafficking is a recognised issue throughout the world in both developed and developing regions, Wood recognises that it is not a preserve of the less developed legal jurisdictions. We understand our position as a leader in the delivery of project, engineering and technical services globally creates challenges and risks for these issues that require dedication to identify and mitigate in our operations or of those we work within.

(i) Wood direct employees and temporary staff, including staff contractors\*

Where Wood exercises the greatest control over employment and working conditions 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 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.

Where we directly employ people, including temporary staff and staff contractors, we have put in place employment policies, procedures and rules to ensure fair and ethical treatment of employees covering all elements of the UDHR within the company'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

Prior to the acquisition both heritage organisations implemented such processes, policies and procedures which are in the process of harmonisation.

Wood has an employee Code of Conduct ('Code') which has been developed through a process of review, consultation and engagement of both heritage companies. It is a governing document that reflects our culture and values and sets out our expectations to guide our employees, and those who work on our behalf and under our direction, in the conduct of day-to-day business worldwide with the highest standards of ethics.



## (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 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.

Where we have direct control of the supply chain Wood has established due diligence procedures which are designed to assist us in identifying supply chain partner risks and set out our expectations as a partner.

Wood's Supply Chain Code of Conduct ('Supply Chain Code') is aligned to Wood's vision, values and behaviours and employee Code, referencing human rights, labour rights, safety and environmental protection and compliance with legal requirements. We require our suppliers to confirm compliance and agreement with our Supply Chain Code.

Where we work with our client's supply chain we will continue to work closely with them to identify and mitigate potential modern slavery and human trafficking, sharing our tools and processes to assist them in addressing these issues.

## (iii) Areas of heightened risk

Wood has identified that the greatest risk for modern slavery and human trafficking exists in our third party relationships, in particular where contractors utilise recruitment agencies and labour brokers for the employment of low skilled staff. 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.

## Our progress

The business is still in the process of harmonising heritage management systems and processes, but this period of review has afforded the company a good opportunity to revisit and refine the processes and practices supporting our approach to modern slavery and human trafficking.

## Training and capacity building

The heritage Amec Foster Wheeler business through the course of 2017 rolled out a Modern Slavery Awareness training module across the business, with a 95% completion rate of targeted groups (managers & executives) by the end of December 2017. In total some 5,866 people completed the course. As our processes and procedures harmonise we will need to revisit our modern slavery and human trafficking training and awareness programme. In heritage Wood Group partnered with the Chartered Institute of Procurement and Supply rolling our ethics training to members of the supply chain team in the eastern part of the business, 143 of our supply chain professionals completed this training.

## Policy and due diligence

Setting down Wood's fundamental governance documents has been a priority since the acquisition of the Amec Foster Wheeler business. This is to ensure that all employees and suppliers have one fundamental governance code which supports Wood's vision and values. The harmonised version of the Code of Conduct and the Supplier Code of Conduct builds on heritage documents. Our new Codes will be implemented across our employee base and suppliers throughout 2018. We will ensure that Wood employees receive awareness training on the new Code of Conduct which contains details on human rights, modern slavery and human trafficking.



## Supply Chain practice

Wood has reviewed both heritage Supply Chain management systems, both heritage organisations had terms and conditions relating to modern slavery and human trafficking. We recognise the challenges present in combining two large companies and through the integration Wood has initiated the harmonisation of key processes and procedures which aim at identification and mitigation of risk from modern slavery and human trafficking. We have renewed our commitment to ensuring our suppliers commit to the highest ethical standards of operation through a new Supplier Code of Conduct that aims to reflect the best of both heritage businesses practices. We will be rolling out the new code across Wood's supplier base through 2018 onwards. Through the integration phase we will also be looking to consolidate supplier due diligence tools ensuring that these retain and enhance the human rights component.

## Building responsibly

Wood has renewed its relationship with Building Responsibly, a business led, business financed initiative focused on improving the rights and welfare of workers in the industry which was set up in March 2017. Wood has contributed to the development of the Worker Welfare Principles which are due to launch in June 2018, these principles establish a common global baseline for the treatment of workers in the engineering and construction industry. Wood has already initiated a review and alignment against these principles.

## Fair recruitment practice

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

## Governance and review

Leadership for human rights issues including modern slavery and human trafficking comes from our Executive Leadership Team (ELT), this aspect of our business falls within our sustainability programme which is regularly reviewed as part of the ELT Safety Days, Chaired by our CEO.

## Modern Slavery working group

Wood has convened a Modern Slavery Working Group with cross functional representation. The group is tasked with providing effective direction and stewardship over our commitment to identify, prevent, detect and remedy slavery within Wood and our supply chain.

## Looking ahead

Wood is committed to building on the good work of both heritage companies and developing a programme that demonstrates our desire to be seen as a global leader recognised for its practices. We will continue to review, update and harmonise policy, procedure and practices designed to mitigate risk in this area and enhance our capability. We will continue to work with Building Responsibly to build capacity, knowledge and understanding to drive improvement across our sector. We will collaborate with clients, partners, peers and industry to improve our own and others responses to human rights.

Name	Robin Watson
Position	Chief Executive
Date	31 May 2018

\*one-man contractors or those that operate within the boundaries of Wood's management systems.

