

Business Ethics Reporting and Anti-Retaliation Policy



Introduction

At Wood we are committed to conducting our business with honesty and integrity. We expect all Wood Personnel, including directors, officers, employees, workers, consultants and contractors anywhere in the World (referred to as "you" in this policy), and our intermediaries, contractors and other business partners ("Business Partners") to uphold these standards and to act in accordance with the Wood Code of Conduct ("Code") and related policies as well as with all applicable laws. We value a culture of openness and accountability and encourage you and our Business Partners to use our Speak Up resources below in order to seek guidance on ethical or compliance issues and to report any concerns regarding any unethical, illegal or suspicious activity or concerns that our Code is not being followed.

Purpose:

The aims of this policy are to:

- remind you of your duty to report any unethical, illegal or suspicious activity that you observe in the knowledge that your concerns will be taken seriously and investigated as appropriate;
- provide guidance on how to raise those concerns;
- provide reassurance that you can raise any concerns in good faith without fear of retaliation, even if those concerns turn out to be mistaken; and
- encourage and facilitate the raising of good faith concerns within Wood prior to seeking resolution outside Wood.

Scope:

This policy applies to all Wood Personnel, working at any Wood business, including any joint venture companies or consortia that are under Wood's day to day control and all Business Partners working or representing any Wood business anywhere in the World.

Policy Requirements:

Our Duty to Raise Concerns

Asking questions and reporting known or suspected misconduct benefits and protects all of us. We all have a duty to report any unethical, illegal or suspicious activity or concerns that our Code is not being followed using our Speak Up resources.

Wood Speak Up Resources

For any Code topic or Code violation, speak to:

- your team leader
- your local People & Organization Business Partner ("P&O")
- Wood Ethics and Compliance ("Compliance")
- Wood Legal ("Legal"), or
- Raise your concern through the Business Ethics Helpline <https://www.woodplc.com/ethics>. For those of you that are not online, phone numbers for the Business Ethics Helpline can be provided by P&O and are displayed on posters throughout Wood workplaces and premises.

Where your concern does not relate to a possible breach of our Code or suspected illegal or unethical behaviour you should use the following resources:

- For HSSEA issues, contact your HSSEA service line leader
- For media inquiries, contact corporate communications at press.office@woodplc.com
- For investor inquiries, contact investor relations at investor.relations@woodplc.com
- For social media inquiries, contact social media at communications@woodplc.com
- For concerns relating to your own employment position or circumstances at work that do not relate to a possible breach of our Code we would encourage you to raise these concerns with P&O.

Confidentiality

Wood will seek to protect the confidentiality of any person making any good faith report. Reports may be submitted using our Speak Up Resources on a confidential basis or may be submitted anonymously via the Wood Ethics Helpline which is operated by a third-party provider and which is open 24 hours a day, 7 days a week in all of the countries that we operate.



Bear in mind that it may be helpful for you to identify yourself so that you can be contacted for further information that may assist with any investigation. If, however you feel that you are not comfortable disclosing your identity, anonymous reports must contain sufficiently detailed information to enable Wood to effectively address the reported activity. If you receive any information about any report and related investigation you must treat this as confidential.

Investigation

Wood takes all concerns seriously and is committed to investigating all reports in a consistent manner. Any ethical concerns or concerns related to the Code are generally addressed by Compliance, Legal, P&O or Internal Audit. You are expected to cooperate with all investigations by providing honest, truthful and complete information.

If you are found to have been personally involved in any wrongdoing, reporting it will not absolve you from accountability – but your cooperation with the investigation will be taken into account when any disciplinary actions are considered.

Wood strives to resolve all matters internally but nothing in policy should be interpreted to prohibit you from reporting, at any time, suspected unlawful conduct to governmental authorities.

Protection from Retaliation

So long as you make a report or notification in good faith, Wood will protect you from being retaliated against, even if the issues raised in your report are not proven by an investigation. "Good faith" means you must have an honest belief that the information

provided is truthful even if the information turns out to be incorrect.

It is Wood's policy that no one making a report in good faith should experience any negative action or discrimination as a result of making their report. This include threats, intimidation, demotion, discrimination, suspension, reassignment, or other forms of retaliation or victimization.

If you believe you have been subjected to any form of retaliation, as a result of making a report or assisting in any investigation, or you witness retaliation against someone else, you should use the Wood Speak Up Resources to report it.

Compliance with this Policy

Anyone who is found to have breached this policy by not reporting a breach or suspected breach of the Code or by retaliating against any person will be subject to disciplinary action or, in the case of Business Partners, termination of any relationship with Wood.

In addition, any person who is found to have made a false allegation, provided false or misleading information in the course of an investigation or otherwise found to have acted in bad faith will be subject to disciplinary action.

Contacts

Any queries in relation to this policy should be directed to the Chief Ethics and Compliance Officer.

To raise a concern or to report a potential violation, use our Speak Up resources detailed above.



Name Ken Merry
Position Chief Ethics and Compliance Officer
Date 01 May 2018

