

Shareholder Privacy Notice

1. Introduction

The Wood Group of companies ("**Wood**", "**we**", "**us**" or "**our**") respects your right to privacy. This Privacy Notice explains how we collect, share and use personal information about you before, during and after you have a shareholding with us, and how you can exercise your privacy rights. The data controller of your personal information is John Wood Group plc, which is registered with the UK's Data Protection Authority ("**ICO**").

2. Scope

This Privacy Notice only applies to personal information that we collect about you (including through the share registry services provided by Equiniti on our behalf) if you are a natural person and either a current or former registered shareholder or if you currently have, or have previously had, an interest in the shares (whether that interest is legal or beneficial), and the rights you have in connection with that information. We have appointed Equiniti to manage our register of shareholders and Equiniti's role as Registrar includes keeping an up-to-date record of shares held by shareholders, administration of shareholder payments, managing share transfers, issuing share certificates and supporting other regulatory functions. In carrying out registry services, Equiniti processes personal information about you as a shareholder on our behalf. In certain instances Equiniti may also be acting a separate data controller (for example, where you register an account directly with Equiniti and/or use any of the engagement tools made available to shareholders by Equiniti (such as the Equiniti Investor Centre)) for services it offers however this is separate from the services provided to Wood. For more information on how Equiniti use your data, please refer to the relevant privacy notices as published on their website (see [here](#).)

If you are also a Wood worker (including those who work on a non-permanent basis, such as contingent, temporary and contract workers, independent contractors, consultants, professional advisors, secondees and interns) and you would like further information about our practices and the rights applicable to you please refer to our [Worker](#) privacy notice. If you use or interact with us as a business partner (for example as a supplier or customer of Wood), and you would like further information about our practices and the rights applicable to you please refer to our [Contacts](#) privacy notice. If you contact us through our Social Media pages please refer to our [Social Media](#) privacy notice about our practices and the rights applicable to you.

3. What does Wood do?

Wood is a global leader in the delivery of project, engineering and technical services to energy and industrial markets, headquartered in Aberdeen, Scotland but with group companies all around the world. We provide performance- driven solutions throughout the asset life cycle, from concept to decommissioning across a broad range of industrial markets, including the upstream, midstream and downstream oil & gas, power & process, environment and infrastructure, clean energy, mining, nuclear, and general industrial sectors.

For more information about Wood, please see [here](#).

4. What personal information does Wood collect and why?

Wood only holds minimum personal information about you, which does not include any sensitive personal data. This may include your name, registered postal address, email address (if registered for non-paper communications), shareholder reference number, details of your past and present holdings of shares and/or present interests in shares, your bank details, gender, details of votes cast/voting instructions, power of attorney details, date of death and a joint holder's name.

We may collect, store, use and process your personal data (with the support of our registrar, Equiniti) in order to:



- compile and maintain our shareholder register and other records and keep them up to date (for example on change of address or name, notification of death, registration of death, lost certificate notifications and reissue of certificates) (*, ** and ***);
- manage your shareholding interest, including processing your shareholder rights and our obligations to you as a shareholder, in accordance with our Articles of Association and applicable laws (for example to pay dividends or other similar payments to you and allow you to exercise your rights as a shareholder, such as the right to vote at shareholder meetings) (* and ***);
- address and respond to enquiries and/or complaints you raise with us or any correspondence you send to us by post, phone or online means (**);
- fulfil our legal and regulatory obligations, including to our regulators, tax officials or otherwise(***);
- operate and improve our business and to enable us to enforce or defend our legal rights, including by bringing or defending legal claims that may be made by or against John Wood Group plc in relation to your shareholdings or interests in shares;
- contact you with shareholder information and related communications, including important information about dividend distributions, shareholder resolutions, reports and meetings, including details of our Annual General Meeting and to keep our shareholders informed about our business, strategy and financial results (*, ** and ***).

Using the key set out in the table below, we have also indicated above (and elsewhere throughout this Privacy Notice as applicable) any relevant legal bases that relate to the processing activity in question. Please also see further details at Section 6 below.

KEY	LEGAL BASIS
*	To perform a contract with you
**	The processing is in our legitimate interests
***	We are under a legal obligation

The personal information that we may collect about you broadly falls into the following categories:

Information that you provide voluntarily

You may voluntarily provide your details to us directly or through your agent or stockbroker, for example on shareholder application and registration forms/identification documentation or when you use our website. We may ask you to provide personal information voluntarily: for example, we may ask you to provide your personal information when you submit enquiries or wish to exercise your rights directly with us. The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

Information that we collect automatically

When you visit our website, we may collect certain information automatically from your device, which in some jurisdictions might be considered as personal information. The information we collect automatically may include your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our website, including the pages accessed and links clicked.



Collecting this information enables us to better understand the visitors who come to our website, where they come from, and what content on our website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading "*Cookies and similar tracking technology*" at Section 8.

Information that we obtain from third party sources

We may also obtain personal information (e.g. name and address) about you directly from third party sources (mainly our share registry service, Equiniti). In general, we will use the personal information we collect from third parties for the purposes described in this Privacy Notice and the privacy notice of the third party, or for purposes that we explain to you at the time we collect your personal information.

5. Who does Wood share my personal information with?

We may disclose your personal information to the following categories of recipients:

- to other Wood companies and third party services providers who provide data processing services to us as necessary to operate our business (for example, Equiniti, our Registrar (for more information, including on Equiniti's security measures and onward transfers, please see [here](#)), professional advisers (including our brokers who assist us with quarterly analysis of certain parts of our shareholder register and composition) and information technology support providers), or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information;
- to any competent law enforcement body, regulatory agency, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person, for e.g. for the purpose of verifying shareholdings or contacting shareholders about matters relating to Wood, their shareholding or a related exercise of rights;
- to a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;
- further to a valid statutory request to inspect or receive a copy of Wood's register of members (or part thereof) for a proper purpose under Section 116 of the Companies Act 2006 (***)
- to any other person/third party at your request or with your consent;
- with any individual or company to whom we propose to transfer our obligations and rights in relation to the administration of our share register; and
- with any other person that requires access to or receipt of your personal information in connection with or as a result of any agreement we may have with or concerning you, or our arrangements with you.

Where our third party service providers process your personal information on our behalf, we only allow them to use it for specified purposes and in accordance with our instructions.



6. Legal basis for processing personal information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

In particular, we will normally collect personal information in order to perform a contract with you (as indicated above by *). In addition, we may collect personal information where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms (as indicated above by **). In some cases, we may also have a legal obligation to collect personal information from you (as indicated above by ***) or may otherwise need the personal information to protect your vital interests or those of another person. In limited circumstances, we may also ask for your consent to process your personal information.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

7. How does Wood keep my personal information secure?

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. Within Wood we take care to allow access to personal information to those who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it.

8. Cookies and similar tracking technology

We use cookies and similar tracking technology (collectively, “**Cookies**”) to collect and use personal information about you. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our [Cookie Notice](#).

9. International data transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

Specifically, other Wood companies and our third-party service providers and partners operate around the world. This means that when we collect your personal information, we may process it in any of these countries. When we export your personal information to a different country, we will take steps to ensure that such data exports comply with applicable laws.

These include:

- reliance on Standard Contractual Clauses or UK approved contractual measures to facilitate data transfers to third parties outside the United Kingdom (“**UK**”) and the European Economic Area (“**EEA**”) who have a legitimate purpose for accessing it;
- entering internal data transfer agreements between companies in the Wood group which protect data to the same standards as the UK and the EEA;



- entering contracts with partners and third party service providers which protect your data to the same standards as the UK and EEA; and
- Wood also implements a range of organisational and technical security measures, such as cyber security training, role based access and encryption, where appropriate, to ensure personal data is secure.

10. Data retention

We only keep personal information for as long as reasonably necessary to achieve the purposes explained in this Notice, or as required by any laws that apply.

Your personal information contained in our share register will be held for no longer than necessary. Other personal information collected will be retained only for so long as we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested) or to comply with applicable legal, regulatory, tax or accounting requirements (for instance, we are required to retain an accurate record of your dealings with us so that, if relevant, we can respond to any complaints or challenges from you or others and/or deal with any claim or dispute that might arise in connection with your shareholding).

When it is no longer legally required or where we no longer have a legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible then we will securely store your personal information and isolate it from any further processing until deletion is possible.

11. Your data protection rights

You may exercise the rights available to you under applicable data protection laws as follows:

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided under the “How to contact us” heading below.
- In addition, if you are a resident of the EEA, UK or Brazil, you can object to processing of your personal information and ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the “[How to contact us](#)” heading below.
- Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. (For more information, please contact your local data protection authority. Contact details for data protection authorities for countries in the EEA can be accessed [here](#) and for the UK [here](#).)



We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

12. Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

13. How to contact us

If you have any questions or concerns about our use of your personal information or wish to exercise any of your rights, please contact us by sending an email to privacy@woodplc.com. For other queries (e.g. relating to your shares) please contact Equiniti in the first instance.

Name Lisa Deverick
Position Group Data Protection Officer
Date 03 October 2022

