

Modern Slavery and Human Trafficking Statement 2024

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.

June 2024

wood.

1. Our commitment

Wood’s long-term vision is to deliver solutions that transform the world. We are a people business and our mission is to be recognised as remarkable people, trusted by clients to design, build and advance the world. Sustainability is not an aspiration but a business imperative that is shaping our business and our interactions with all of our stakeholders as we seek to advance the world to be cleaner, more sustainable, safer, more secure, ethical, and equitable.

The foundations of our sustainability approach are built on the UN Global Compact Principles and global Sustainable Development Goals. These form a core part of our materiality assessments and their ambitions are adopted into our approaches. Authentic, sustainable development means that sustainability principles are incorporated 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; 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 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 100 years of history. We operate in more than 60 countries, employing around 35,000 people, with revenues of approximately \$6 billion. The business delivers services across two broad end markets:

Energy

We are leaders in energy – ensuring safe, reliable and affordable energy while enabling a lower carbon energy future.

- Oil & Gas
- Hydrogen
- Carbon Capture

Materials

We are leaders in materials processing and production, applying circular economy practices to deliver critical materials sustainably and responsibly as we strive for net zero.

- Minerals
- Chemicals
- Life Sciences

Decarbonisation

Digitalisation

Wood is a global leader in consulting and engineering across energy and materials markets. Our operating model is service-defined to deliver consulting, projects and operations solutions to clients across the lifecycle of their projects. We operate three global business units across those areas.



Consulting

Is a focused, premium consultancy adding value throughout our clients' investment lifecycle in energy and materials markets.

Projects

Delivers solutions for clients' complex, high-value capital investments in energy and materials markets.

Operations

Provides essential services that keep the world's most critical industries performing, predominantly in energy markets.

As a global business of breadth and scale, we work across a wide variety of client partnerships and contracts globally, from initial concept and design to engineering, procurement and construction management. Our supply chain is vital to the delivery of our global portfolio. Due to the nature of the work we do our supply chain is extensive and complex, covering everything from consumables to specialist subcontractor activity.

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 approach, focused on 'People, Planet and Profit' is an enabler for us to achieve our strategy.

People: Improve lives

We are committed to respecting, nurturing and developing the people and places we impact. We are focused on delivering 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. We aim to demonstrate **performance excellence** in how we execute our work, to deliver more sustainable solutions for our clients.

Profit: Deliver sustainable growth

We are focused on creating sustained **profitable growth** that meets the needs of our stakeholders, whilst delivering solutions that transform the world.

Read more on our strategy in our 2023 annual report (pages 16-18)

3. Governance and leadership

Policies & processes related to modern slavery and human trafficking

Modern slavery and human trafficking risks are managed throughout our governance processes. To support our programme of compliance, we continue to develop and evolve our policies with input from our in-house experts, suppliers and external stakeholders. We have a number of mandatory global policies relevant to modern slavery, as set out in the table below:

| | |
|--|---|
| Code of Conduct | <p>Our Code of Conduct sets out fundamental expectations for all employees on upholding human rights and the Universal Declaration of Human Rights. It codifies our zero tolerance for abuses of human rights, inclusive of modern slavery and human trafficking and is approved by the Board.</p> <p>The Code of Conduct was updated in 2022, incorporating leadership introductions from the Chair of the Board, Chief Executive Officer and General Counsel and Company Secretary.</p> <p>Our Code of Conduct Doing the right thing (woodplc.com)</p> |
| Supply Chain Code of Conduct | <p>Aligned to Wood’s Code of Conduct, the Supply Chain Code of Conduct sets out our expectations of suppliers including the upholding human rights and the Universal Declaration of Human Rights, and zero tolerance of abuses of human rights, inclusive of modern slavery and human trafficking. The Supply Chain Code of Conduct 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 support for Wood’s sustainability goals.</p> <p>In 2022, our Supply Chain 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> <p>Supply Chain Code of Conduct (woodplc.com)</p> |
| Human Rights Policy | <p>Our Human Rights policy states our commitment to respect and enforce internationally recognised human rights in line with the principles and guidance contained in the United Nations (UN) Guiding Principles on Human Rights.</p> <p>Human Rights (woodplc.com)</p> |
| Business Ethics Reporting and Anti-Retaliation Policy | <p>This policy aims to strengthen our Speak Up culture, to identify Wood’s Speak Up resources, and provide reassurance that all Wood personnel and any third party can raise any concerns in good faith without fear of retaliation.</p> <p>The policy was updated in February 2024 as part of our standard Ethics & Compliance policy review cycle.</p> <p>Business Ethics Reporting and Anti-Retaliation Policy (woodplc.com)</p> |

Modern slavery, human trafficking and wider human rights abuse are a potential risk to our organisation. The policies set out above are supported by a number of governance and due diligence processes designed to identify, manage and mitigate human rights risks in our business and supply chain. These processes, set out in the table below, operate continuously in our business and operated throughout 2023.

Governance and due diligence processes

| | |
|---|---|
| Supply Chain Function – Supplier Selection, Evaluation and Management Standard | This Standard details how we manage our governance within the supply chain and is a core and mandatory element of our supply chain management approach. The standard sets out our process and expectations for our supply chain teams in their role to onboard new suppliers and manage existing suppliers to ensure the third parties Wood works with are safe, ethical, meet required health, safety, security, environment, sustainability and quality standards and align to our Supply Chain Code of Conduct. |
| Supply Chain Function – Supplier re-evaluation and due diligence processes | <p>We conduct due diligence activities on a selection of suppliers across a range of risk areas, including modern slavery. A suite of training and questionnaires are issued to these suppliers to allow us to better understand the risk profile they bring to Wood and we work with them to close any gaps and implement improvements.</p> <p>Wood maintains a watchlist of suppliers who are onboarded by Wood to identify any potentially ‘high risk suppliers’, including from a modern slavery perspective. Any such suppliers are subject to additional review by Wood’s sustainability function.</p> <p>During 2023, the Supplier Selection, Evaluation and Management Standard was updated to require that, all suppliers, other than certain excepted categories, are subject to a re-evaluation at least every three years. This process ensures that suppliers with whom Wood engages, re-affirm their commitments to Wood and uphold our expectations of them.</p> |
| 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 risk review aimed at ensuring that Wood does not contribute to the abuse of human rights, including modern slavery and human trafficking. |
| Human Resources 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. |
| Ethics Helpline | Our Ethics Helpline is aimed principally at our colleagues but is also available to others working in our supply chain, customers and the general public. This confidential reporting channel is managed by a third party and reporters can raise concerns by telephone or online in multiple languages and may elect to remain anonymous. All concerns are reviewed and necessary disciplinary action and/or remedial action is taken as appropriate. |

In 2022, we developed the Sustainability Code of Practice (SCoP) to support Wood’s published sustainability targets. The SCoP is a tool to ensure a systematic approach to onsite awareness and monitoring of sustainability matters at a project site level. Amongst other matters, the SCoP includes consideration of worker welfare matters in line with the Building Responsibly Principles and human rights matters with a view to addressing modern slavery issues at the project site and translating our objectives into tangible actions on Wood projects. The SCoP was rolled out to the business in 2023 and complements our governance and due diligence processes by raising awareness of matters such as modern slavery risk and providing guidance on actions that can be taken to address them.

Oversight and leadership

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

Safety and Sustainability Committee of the Board

The Safety and Sustainability Committee is comprised of independent non-executive directors. The committee provides oversight of Wood’s management of material sustainability matters, including modern slavery and human trafficking matters, and also oversees Wood’s sustainability programme and performance against targets. It also reviews and makes recommendations on this Modern Slavery and Human Trafficking statement on behalf of the Board, prior to Board approval.

Executive Leadership Team (ELT)

During 2023, the Executive President of Business Sustainability and Assurance ensured that material sustainability matters including modern slavery were discussed with the Executive Leadership Team and given effective oversight through Wood’s sustainability programme. Quarterly engagements with the ELT are used to monitor risks inclusive of modern slavery and human trafficking and regulatory requirements including this statement.

Responsibility for sustainability matters at the ELT level in 2024 will be reviewed following the changes to the ELT as set out on page 98 of our 2023 annual report.

During 2023, the President of Sustainability owned 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 worked closely with internal functions, operations, and the broader stakeholder base to ensure we continue to demonstrate our commitment to the UN Global Compact.

4. Assessing the risks

Operating in over 60 countries and with an extensive supply chain, we must remain vigilant to the potential risks 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 President of Group Audit & Risk and our internal audit function, we apply a global approach to managing our human rights risk register.

Our focus on the risk of modern slavery and human trafficking distinguishes between two situations:

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 where we have the greatest 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 risks

Human rights risks extend across the value chain requiring all parts of Wood to work together to eliminate risk. We acknowledge that addressing the risk of human rights is complex, requiring an interconnected, collaborative approach to ensure we deliver the standards set by our Code of Conduct.

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. We are focused on 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

Our due diligence of new suppliers to Wood has evolved via continual improvements to the assessment processes we employ. 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 only 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. We support the Building Responsibly initiative and its 10 Principles for worker welfare, which was born from this challenge, as it 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. Embedding the Building Responsibly Principles into our organisation and business interactions forms part of Wood's approach to upholding fundamental human rights and the interest of those who work for, or on our behalf. We continued to support this throughout 2023 as a member 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 base has clear working standards detailed in the Code of Conduct, complemented by the SCoP, as do our suppliers through the Supplier Code of Conduct.

Wood has established mechanisms for all stakeholders to raise issues through our Speak Up process, including via Responsible Officers, Ethics and Compliance team or anonymously, if required, through the Ethics helpline. All concerns, including allegations of modern slavery and human trafficking, are reviewed and we use the Building Responsibly Principles to assess 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 integral part of Wood's material sustainability matters, forming an important pillar of our social risk landscape. 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). 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 incorporated worker welfare into our sustainability targets. Our targets are to:

- 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 plan and we report our progress annually through our Annual Report and Accounts and website.

Access our strategy and learn more about our goals at: [Strategy and goals | Wood \(woodplc.com\)](http://Strategy and goals | Wood (woodplc.com))

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 2023 we continued to operate our multi-layered, risk-based ethics and compliance training and communications plan. The plan incorporates a variety of approaches, 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. High-level survey results are 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. The following operated during 2023 to raise awareness:

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|--|--|
| Mandatory Ethics Certification & Training | <p>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, and all other employees are expected to complete the certification. In addition, new hires are sent the Code of Conduct to sign their commitment as part of the onboarding process.</p> <p>Wood develops its ethics and compliance training and communications plan on an annual basis and the plan is reviewed by E&C leadership on a monthly basis for accountability and adaptability to readjust priorities depending on internal and external circumstances. In 2023, mandatory computer-based training on gifts and hospitality and conflicts of interest (as two bribery and corruption risk areas) was assigned to more than 5,000 individuals in roles most exposed to those risks at Wood. One hundred per cent completion was attained.</p> |
| Code of Conduct training for new starters | Code of Conduct computer-based package for new starters, available through our Oracle People system. |
| Sustainability Training | General awareness training course outlining key material impacts inclusive of human rights and how they affect Wood. |
| Responsible Officer Engagement | Responsible Officers continue to participate in 1-2-1 engagement on all elements of our Code of Conduct. |
| Human Rights Awareness Training | <p>This training ensures our employees know what we mean by Human Rights and what that means within the wood organisation. It also provides insight into Building Responsibly, its worker welfare principles and how we embed these principles in Wood.</p> <p>A version of this training is also available to our suppliers through Wood's supplier support hub.</p> <p>In 2023 our HR leaders undertook training in worker welfare principles, and their role in safeguarding against modern slavery and human trafficking.</p> |
| Building Responsibly – Supplier Awareness | Wood reached out to all their global labour suppliers and issued them with external Human Rights training, of the 91 suppliers we have engaged with, to date 68 have confirmed completion of training and re-affirmed their commitment to Building Responsibly Principles to date. |
| Sustainability Code of Practice (SCoP) | In 2023, the SCoP was rolled out within Wood to raise awareness and build capacity to take action at a project site level on a range of sustainability matters including human rights and worker welfare matters. |

7. Look ahead

Human rights, inclusive of modern slavery and human trafficking, form an integral part of Wood's ESG risk issues to manage. Throughout 2023, the President of Sustainability role continued to bring a focused level of leadership to Wood's ESG risk management and 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.

The management of Human Rights risks continues to be a priority. We will continue to evolve our management and monitoring of modern slavery and human trafficking, supported by our internal audit team, with learnings being shared across the business and functions.

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 and 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 19 June 2024

Footnotes:

1. This statement was approved by the board of directors on 19 June 2024.
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
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 (Indonesia) Ltd
Wood Australia Pty Ltd
Wood Field Services Pty Ltd
Wood Group Kenny Limited
Wood Group Kenny UK Limited
Wood Group UK Limited
Wood Transmission and Distribution Limited