

Ethical Supply Chain and Modern Slavery Statement **2020**



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Our commitment

We respect the basic rights of the people we deal with. We won't take part in activities that encourage human rights abuses. We don't employ or approve of forced, compulsory or child labour.

Our commitment to the highest standards of business ethics is reflected in our **Code of Conduct**. This means we are committed to making a positive impact in the communities in which we work.

This statement applies to Worley Limited and our global operations and suppliers, including our subsidiaries. The statement describes the actions taken during the last financial year (1 July 2019 to 30 June 2020) to address modern slavery risks in our business and supply chains and sets out the procedures we have in place to address the risks. The statement also sets our plans to improve the program over the next 12 months. This statement addresses our obligations under the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (Cth).

Consultation and engagement

Our Modern Slavery program and related policies, including, our Code of Conduct, are used across all of Worley globally. The Code of Conduct is developed in consultation with leaders and experts who provide supporting systems and processes across all Worley. Our management system, procedures, due diligence tools, training and education resources are available to all parts of the company.

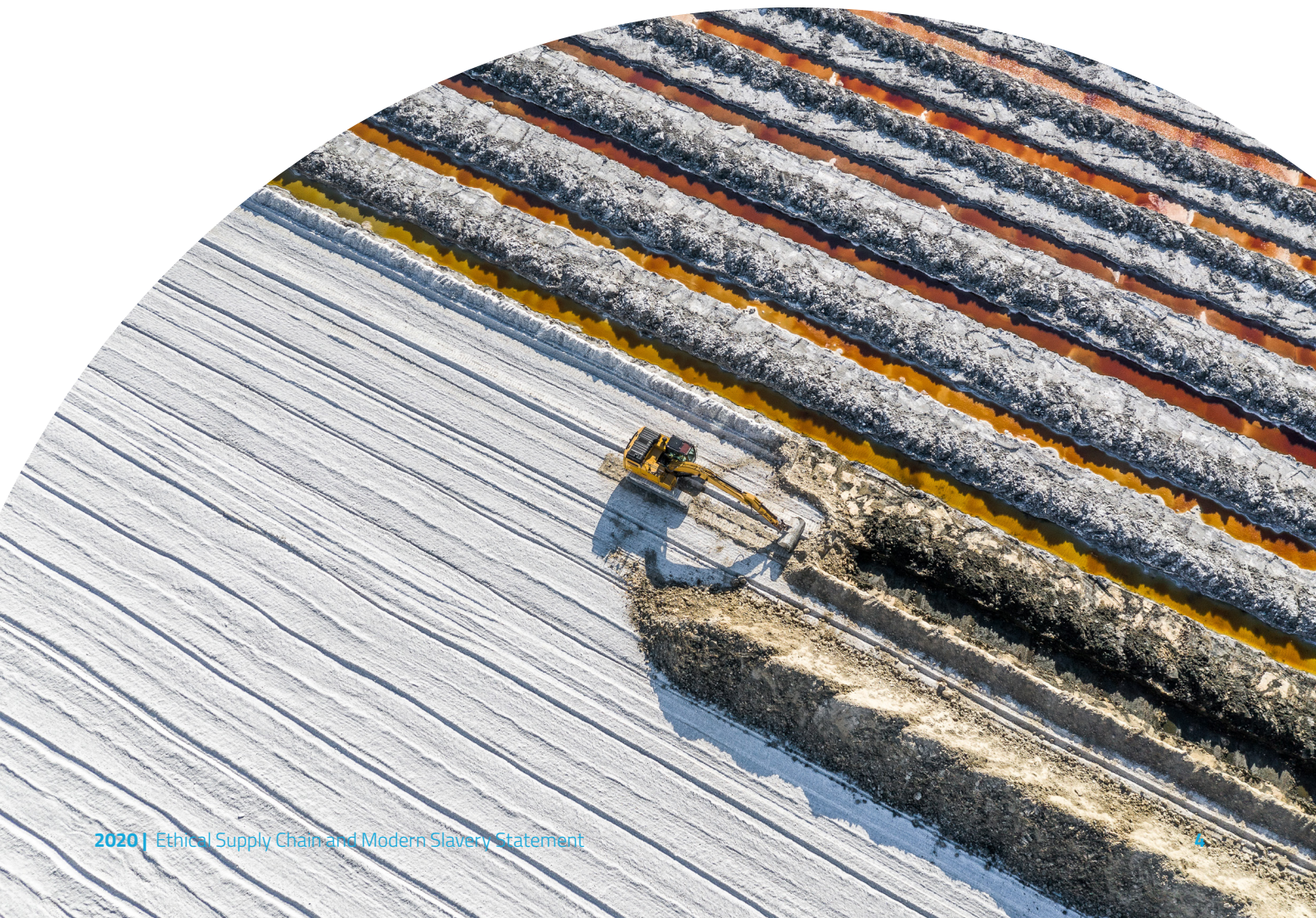
Who we are: Our structure, operations and supply chains

Worley Limited is publicly listed on the Australian Securities Exchange and is headquartered in Sydney, Australia. Worley Limited is the ultimate parent company of the Worley Group entities set out in the Schedule which will be collectively referred to as "Worley" for the purpose of this statement. Worley employs over 54,000 people in over 50 countries.

Worley delivers projects, provides expertise in engineering, procurement and construction and offers a wide range of consulting and advisory services. We cover the full lifecycle, from creating new assets to sustaining and enhancing operating assets, in the hydrocarbons, mining, mineral, metals, chemicals, power and infrastructure sectors. Our resources and energy are focused on responding to and meeting the needs of our customers over the long term and thereby creating value for our shareholders.

To support our operations, we buy products and services, including materials, equipment, hospitality, transportation and labour, from suppliers across the countries in which we work, procure and deliver.

As part of our sustainability approach, our procurement team and our wider supply chain is also committed to supporting wherever possible local businesses, training and employing local people and using local resources from communities where we operate, as set out in our **Supply Chain Code of Conduct**.



Areas of risk

We operate with customers, partners, and suppliers in many different locations, so we know that the risk of modern slavery can vary across our business locations and operations. We also know that some of our services are high risk sectors, particularly construction, fabrication and mining, minerals and metals.

We've therefore identified the following risk areas to help us assess and address modern slavery:

Suppliers of products and services

We know that supply chains are complex. Suppliers might use lower tier suppliers or sub-contractors and low-skilled labour. As a result, the risks of not seeing modern slavery are increased.

We have set expectations to reduce these risks which are defined in our **Supply Chain Code of Conduct**. More detail can be found under the policy and governance section in this statement.

Customers

Our customers might be a modern slavery risk. Under our Responsible Business Assessment process, new and existing customers are screened. Potential issues

raised in this process are then reviewed and additional due diligence may be done to further understand the issues. Our Responsible Business Assessment was reviewed and updated in early 2020. This included more consideration of ethical due diligence requirements.

We won't do any business with anyone who doesn't meet our Responsible Business Assessment standards.

Recruitment

The people that we directly hire and those we engage through agencies, including temporary staff and contractors, can be at risk of human trafficking, bonded labour, and other forms of modern slavery across all countries. We've put in place fair recruitment practices, employment policies and procedures to make sure all are treated ethically.

Third party recruitment providers are considered to be high risk, particularly when they recruit for activities such as unskilled and construction work. Additional risk lies where recruitment is from countries with higher risk of modern slavery and fewer governmental controls to protect workers. These suppliers meet or exceed the expectations outlined in our Supply Chain Code of Conduct. We conduct additional due diligence where the risk is considered to be high.



Policies and governance

Our people and recruitment

We directly employ people and engage temporary staff and contractors. To make sure of fair recruitment practices, we follow employment policies and procedures which include, but are not limited to: Global Diversity and Inclusion, and Equal Opportunities Procedures. These policies make sure of the ethical treatment of all our people.

To strengthen our governance and response to modern slavery we're a signatory to the UN Global Compact (UNGC), which aligns our practices with the 10 universally accepted principles in the areas of human rights, labour standards, environment and anti-corruption.

Our commitments are also aligned with the Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) Conventions which means we must make sure that:

- Local laws are respected
- Employment is freely chosen
- Child labour is not used
- Illegal labour is not used
- Appropriate wages are paid
- Working hours are not excessive
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Discrimination is not practiced
- No harsh or inhumane treatment is allowed
- Businesses operate ethically
- Unauthorised sub-contracting isn't allowed
- Due regard is given to environmental impacts

These are further supported by our **Supply Chain Code of Conduct**, **Corporate Responsibility Policy**, **Human Rights Policy**, and our **Diversity and Inclusion Policy** which state that we don't engage with any form of slavery and reject the use of forced, compulsory or child labour.

Worley has recently become a member of **Building Responsibly**. As a member, we're committed to acting ethically and with integrity by supporting and adopting the 10 worker welfare principles. These are:

1. Workers are treated with dignity, respect, and fairness
2. Workers are free from forced, trafficked, and child labour
3. Recruitment practices are ethical, legal, voluntary, and free from discrimination
4. Freedom to change employment is respected
5. Working conditions are safe and healthy
6. Living conditions are safe, clean, and habitable
7. Access to documentation and mobility is unrestricted
8. Wage and benefit agreements are respected
9. Worker representation is respected
10. Grievance mechanisms and access to remedy are readily available

Supply Chain Code of Conduct

We work with our customers and suppliers to put in place socially responsible supply chain and anti-corruption practices because these are key to us having the highest standards of governance and ethics.

In addition to our pre-qualification process, which can include visits to suppliers' and lower tier supplier facilities, our suppliers must follow our **Supply Chain Code of Conduct**.

This sets out minimum requirements for our suppliers. They must work to the law and to internationally recognised standards and appropriate codes of practice. They must also strive to put in place socially responsible supply chain, anti-bribery and anti-corruption practices. This includes not using any form of child or forced labour and providing fair pay and working conditions.

Our project procurement and contracting teams follow the guidance in our policies and standards for procurement and contracts.

As part of this code we favour suppliers and contractors who share our commitment to:

- Supporting sustainability
- Supporting human rights and fair employment practices
- Maintaining and improving the work environment so that it is safe and healthy for all staff and visitors
- Conducting their business operations in a way that protects and sustains the environment
- Adopting similar principles and practices to those in the code in selecting, monitoring and managing their own suppliers and contractors
- Understanding their responsibility to the local communities on which they have an impact and from which they profit

Suppliers who share our commitments to ethical working and understand our Supply Chain Code of Conduct can register on our global supplier portal that connects them to our procurement professionals.

Raising concerns

In line with our **Whistleblower Policy**, we have a 24-hour, 7 day per week, multi-language **Ethics Helpline**. Our people are actively encouraged to report ethics concerns either to their Supervisor, Human Resources team or through the **Ethics Helpline**. All reports are investigated in line with to our Ethics Reporting and Whistleblower Standard.

Due diligence

Customers

Worley has a Responsible Business Assessment process. Using this process we assess the risk profile of customers in five areas:

1. Trade sanctions
2. Ethical business practices
3. Social licence
4. Credit worthiness
5. Carbon emissions

As part of the ethical business practices assessment we conduct screening via third party databases which focus on:

1. Bribery and corruption
2. Human rights violations
3. Environmental damages
4. Labour management issues
5. Safety
6. Ethical issues / breaches

In early 2020 we integrated ethical customer due diligence into our Sales platform. This allows our Sales team to identify issues early on, discuss them with the business, develop measures to counter them and seek the approvals needed. Customer due diligence has been broadened from the focus on bribery and corruption to a holistic view of ethical conduct.

Supply Chain

In late 2019, we launched a Supply Chain risk assessment module within our due diligence tool. Since the program launch, over 150 members of our Global Procurement team have been trained. Additional third-party due diligence may be done if the initial due diligence screening shows areas of concern.

Our suppliers must to meet the expectations of our Supply Chain Code of Conduct.

Partners

We have a comprehensive program for doing due diligence on our potential partners. This includes sales agents, joint ventures and consortiums. We take a risk-based approach to determine the level of due diligence needed for each partner. All new partnerships must have the due diligence approved by Compliance and Legal and associated mitigation strategies in place before they can go ahead.



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Worley launched
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Training

In January 2020, we held a Modern Slavery awareness month and shared training and awareness resources across Worley. We will continue to run an annual focus topic on Modern Slavery. More learning is planned for Supply Chain and Human Resources teams and anyone who is involved with high risk areas of our business.

We also provide Code of Conduct training to all our people on commencement of employment and an annual refresher to maintain levels of awareness.

Measuring effectiveness

In our annual Sustainability Report we provide statistics for our Code of Conduct training, Ethics Helpline and due diligence volume.

This highlights our sustainability performance across Worley as well as our commitment to the UN Global Compact.

A committee has been set up to turn the commitments within this statement into actions throughout the year. Performance against our commitments will be shared in detail in our next annual Modern Slavery Statement.

Our Modern Slavery program will be reviewed by our Internal Audit department in this financial year and benchmarked against legal requirements. This baseline will be used to develop our program for the next three years.

We provide Code of Conduct training for all our people each year

Future commitments

We know that our commitment to ethical business practices needs continual effort.

This year we will further strengthen our Supply Chain program. Ethical due diligence and prequalification assessments will be included in our new Supplier Registration database. We will continue to do risk assessments of our Supply Chain and put in place more actions to support and monitor those who we see as high risk.

This year we'll also complete the addition of customer due diligence into the sales process and we'll continue to support the team in carrying out Responsible Business Assessments.

Area of risk	Focus for this year
Customer due diligence	Customer Success Platform integration and Customer Ethics due diligence both completed in line with updated Responsible Business Assessment.
Supply chain due diligence	Worley's risk assessment and due diligence process included in Requis supplier registration tool.
Supplier expectations	Refresh our Supply Chain Code of Conduct to strengthen Modern Slavery requirements and align with Building Responsibly guidance.
Supplier monitoring	Work with our global Assurance team to include Modern Slavery in our existing audit processes.
Supplier support	Develop toolbox of resources to support smaller suppliers in educating their personnel and sub suppliers and promoting awareness of Modern Slavery.
Recruitment	Form a working group with representatives of our People group to actively monitor and improve processes to manage modern slavery risks associated with recruitment and the use of recruitment providers.

This statement is approved by the Worley board of directors on behalf of Worley and will be reviewed annually.

Chris Ashton

CEO

Schedule

This statement applies to Worley Limited and all entities within the Worley Group of companies as set out below.

Reporting entity:

Worley Limited
ACN - 096 090 158
Level 15
141 Walker Street
NORTH SYDNEY NSW 2060 Australia

In accordance with the UK Modern Slavery Act 2015, the following Worley Group UK entities are included in this statement:

1. 3sun Academy Limited
2. 3sun Controls Limited
3. 3sun Energy Limited
4. 3sun Group Limited
5. 3sun Inspection Services Limited
6. 3sun Limited
7. 3sun Subsea Limited
8. Access Inspection Development Limited
9. Advisian Group Limited
10. Advisian Limited (EUR)
11. Aspinwall & Co Limited
12. Colin Buchanan and Partners Limited
13. Dawson Energy Limited
14. Energy Resourcing Europe Ltd
15. Enviros Group Limited
16. Enviros Limited
17. Enviros Management Services Limited
18. Ingen Holdings Limited
19. Ingen-Ideas Limited
20. INTECSEA (UK) Limited
21. Performance Improvements (PI) Group Ltd
22. Performance Improvements (PI) Ltd
23. PI Gas Turbines Limited
24. Primat Recruitment Ltd
25. RRC Controls Services Limited
26. Scopus Engineering Holdings Ltd
27. Scopus Engineering Ltd
28. Scopus Group (Holdings) Ltd
29. Specialist Equipment Solutions Ltd
30. Worley E&C International Limited
31. Worley EAMES Holdings Limited
32. Worley Europe Ltd.
33. Worley Europe Services Limited
34. Worley Field Services Limited
35. Worley Group UK Limited
36. Worley Services UK Limited
37. Worley UK Finance Sub Limited
38. Worley UK Finance Sub No. 2 Ltd
39. Worley UK Finance Sub No. 3 Ltd
40. Worley UK Holdings Ltd
41. Worley UK Pty Limited

This statement is a joint statement on behalf of Worley and the following wholly owned entities in accordance with the Australian Modern Slavery Act 2018 (Cth):

1. Worley Services Pty Ltd (ACN 001 279 812)
2. Worley ECR Pty Ltd (ACN 631 041 195)
3. Worley Engineering Pty Limited (ACN 008 876 284)
4. Worley Financial Services Pty Limited (ACN 001 279 812)
5. Advisian Pty Ltd (ACN 098 008 818)
6. IntecSea Pty Ltd (ACN 008 961 260)
7. Energy Resourcing Australia Pty Ltd (ACN 076 232 605)



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