

### Introduction

### About Modern Slavery

Modern slavery is a hidden crime and a serious violation of human rights, encompassing a range of exploitative practices, including but not limited to human trafficking, forced labor, child labor, debt bondage, deceptive recruitment, and domestic servitude.

This statement outlines our modern slavery prevention efforts for the FY2025 financial period (1 July 2024 - 30 June 2025). It covers the actions we've taken across the Worley Group to identify, manage, and reduce the risk of modern slavery in our operations and supply chain.

This is our sixth Group Modern Slavery Statement outlining our commitments and contributions to comply with the Australian Modern Slavery Act 2018 (Cth), the United Kingdom (UK) Modern Slavery Act 2015, and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023.

#### **About this statement**

All our business entities — where we have operational control and meet the reporting threshold for the Australian Modern Slavery Act 2018 (Cth), the United Kingdom Modern Slavery Act 2015, and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 — report under Worley Limited in this joint statement. We've provided further detail on Worley Group entities covered by this statement in Appendix 1.

Worley Rosenberg, our business in Norway, is subject to additional reporting requirements under the Norwegian Transparency Act (2022), which are addressed in a separate report.

Information in this statement applies to all reporting entities unless otherwise stated. All entities that are wholly owned by Worley Limited will be collectively referred to as 'Worley' throughout this document. We refer to entities we don't wholly own as joint ventures.

Programs like this only succeed with support from across our business. It takes commitment, collaboration, and action from our people to make meaningful progress. This year's statement and program of initiatives were led by our Sustainability Performance team, and supported by teams across the business, including Ethics & Compliance, Company Secretary, Enterprise Risk, Health & Safety, Internal Audit, Legal, People (human resources), Project Delivery, Quality and Supply Chain Management.

We deliver this statement through a controlled review program, which includes internal verification with senior leadership prior to formal approval by our Board.



### **Acknowledgement of Country**

We acknowledge and pay respect to the past, present and future Traditional Custodians of Country throughout Australia, and extend this acknowledgement and respect to First Peoples in all countries in which we operate. In Australia, it is Aboriginal and Torres Strait Islander Peoples who have cared for and sustained the land, its animals, plants, and water for more than 65,000 years. We recognize the continuation and importance of cultural, spiritual, and educational practices of Aboriginal and Torres Strait Islander Peoples.

Artwork "Tracks We Share" by Contemporary Indigenous Artist Lauren Rogers.



### **Land Acknowledgement**

We recognize that the lands where we operate in Canada are the ancestral homelands of diverse First Nations, Métis, and Inuit people. In the spirit of respect, reciprocity, and truth, we honour and acknowledge the land on which we are guests. We are committed to respecting the histories, languages, and cultures of First Nations, Métis, Inuit, and all First Peoples of Canada, whose presence continues to enrich our vibrant country.

Artwork by Elaine Landry, Deh Cho Dene First Nation from Treaty 11, born and raised in the Northwest Territories.

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This is an interactive PDF designed to enhance your experience. The best way to view this report is with Adobe Reader. Click on the links on the contents pages or use the home button.

We're driven by our purpose: delivering a more sustainable world. Respecting, protecting, and promoting human rights is fundamental to who we are.

We've had long-standing commitments to human rights and promoting the safety and welfare of people. We continue to insist on the highest standards of business conduct, remaining vigilant to ensure that everyone is treated with dignity, respect, and fairness.

There has been a convergence of global issues this year — including conflict-driven migration, geopolitical tensions and rising inequality — that have contributed to the increased risk of modern slavery.

As a global company operating in over 40 countries, we understand the heightened responsibility we carry to proactively identify, prevent, and address modern slavery risks within our operations and supply chains.

This year, we've continued to strengthen our modern slavery prevention program, guided by our Human Rights in Practice Framework. We focused on enhancing risk assessments, deepening due diligence, and further embedding our policies and standards into everyday practice.

Recognizing the complex global landscape and our presence in higher-risk jurisdictions, we've prioritized the strengthening of risk management and responsible business practices. This includes conducting an operational human rights salience assessment and enhancing third party due diligence with new software.

Further embedding our Modern Slavery Policy across our operations is a high priority. This year, we continued to build internal capability through tailored training and engagement.

We're proud to have received an 'A' rating for our FY2023 Modern Slavery Statement from Monash University for the second consecutive year – recognition of the quality and transparency of our reporting.

Our program takes a collaborative effort. I'd like to thank our partners at the UN Global Compact and Building Responsibly and acknowledge the dedication of our leaders and teams across Worley. Your efforts have been critical to our progress.

I'm encouraged by the work we've done so far but I also recognize that we must always remain vigilant. I'm pleased to present our sixth group Modern Slavery Statement, which outlines our progress and reaffirms our commitment to eradicating modern slavery.

-Signed by:

### **Chris Ashton**

Chief Executive Officer Worley Limited

October 2025

*In accordance with the requirements of the Fighting* Against Forced Labour and Child Labour in Supply Chains Act (Act), I have the authority to bind Worley Canada Services Limited and Chemetics Inc. and in particular section 11 thereof, I, in the capacity of Chief Executive Officer, attest that I have reviewed the information contained in the report on behalf of the governing body of the entities listed within. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed within this report.



# Purpose, Ambition, Strategy and Values

### Purpose

Delivering a more sustainable world.

### **Ambition**

We will be recognized as a global leader in sustainability solutions.

Our ambition is based on three pillars: our people, our portfolio and our planet.



### People

We focus on energizing and empowering our people to drive positive outcomes for customers, communities and the environment. This builds competitive advantage to strengthen business resilience and accelerate growth.



### **Portfolio**

We focus on building a trusted, best-in-class portfolio that helps our customers navigate complexity and accelerate traditional, transitional and sustainability projects. This positions us to grow with purpose, deliver higher returns, and expand the value we create and share. By implementing new solution-based models enabled by data, technology and automation — we deepen customer partnerships and drive greater return on investment.



### Planet

We focus on partnering with customers as stewards of a more sustainable world by supporting the decarbonization of industries and applying our standards to protect the natural environment in our work. This reinforces our leadership in sustainability and our commitment to a net-zero future.

### **Strategy**

### Strengthen

leadership in core markets

### **Expand**

into growth markets and along the value chain

#### Innovate

to unlock opportunities and efficiency

### **Values**



#### We value life

We believe in the safety, health, and wellbeing of our people, communities, and the environment. Without it nothing else matters.



### We are stronger together

We thrive in real relationships and partnerships. We nurture networks and collaboration. We recognize our differences make us stronger.



### We rise to the challenge

We love a challenge. We go the extra mile, delivering new and better solutions to complex problems.



#### We unlock brilliance

We are passionate about innovating and learning. We value, share, and grow our expertise.

CEO Message | Purpose, Ambition, Strategy and Values | Structure, Activities and Supply Chain | Approach and Actions | Governance | Due Diligence | Effectiveness | Appendices

# Structure, Activities and Supply Chain

### **Our brands**

Worley Limited (ACN 096 090 158) has its registered office at Level 19, 420 George Street, Sydney, New South Wales, Australia, and its shares are publicly listed on the Australian Securities Exchange (WOR). Further details of our reporting entities are provided in Appendix 1.

#### **Master brand**



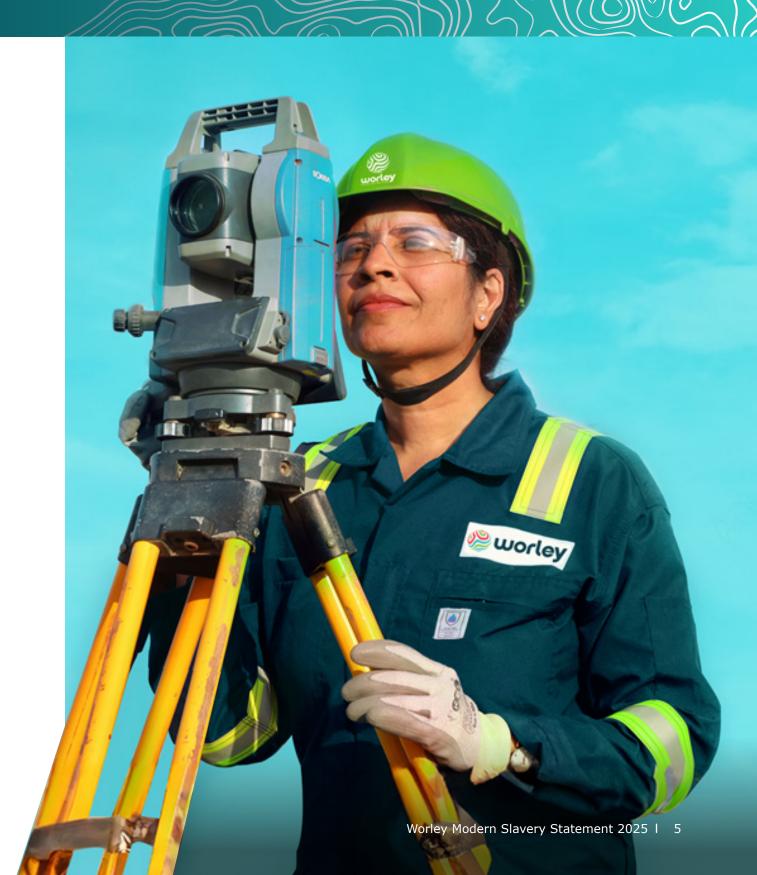
#### **Core brands**





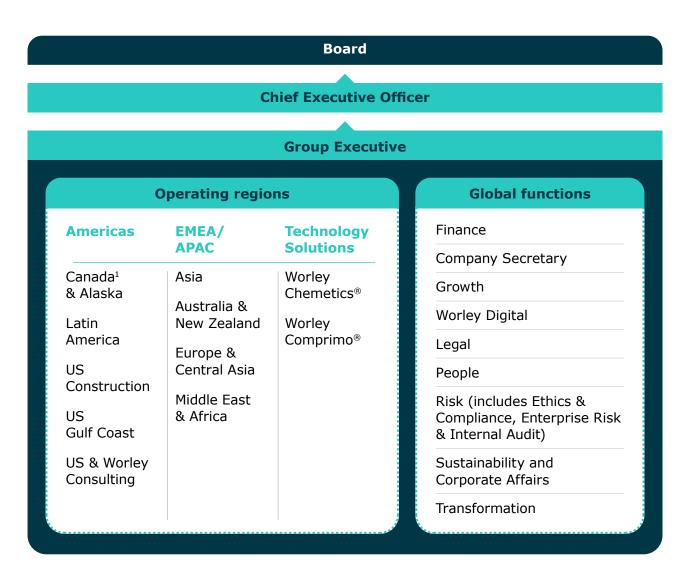






### **Our structure**

The structure of our organization reflects our operational regions and our global corporate functions.



1. Reporting lines for Canadian entities meeting their obligations to Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act (2023) through this group statement.

### Our people

We're committed to respecting people's fundamental human rights and maintaining the highest standards of business conduct, ensuring our people are treated with dignity, respect, and fairness.



45,500+

**People across** 44 countries

83.9%

are direct employees

3,377

total number of people in Australia

7,506

total number of people in India

6,145

total number of people in United States 16.1%

are contract staff

total number of people in Canada

2,112

total number of people in United Kingdom

5,171

total number of people in Morocco<sup>2</sup>

Our workforce comprises 87.5% professional services employees, and 12.5% craft workers. While most of our people are based in our major operating centers and offices, a significant number are deployed on customer and project sites around the world.

The countries where we have the highest number of people are: India, United States, Morocco, Canada, Australia and the United Kingdom.

2. Morocco employees form part of our JESA joint venture.

### **Our Activities**

We are a leading global professional services company of energy, chemicals and resources experts. We partner with customers to deliver projects and create value over the life of their assets.

For information on our entities' activities, please refer to Appendix 2.

#### **Our sectors**

#### **Energy**

Producing energy from traditional, transitional, and sustainable resources (for example, oil, gas, biofuels, and renewables). We also undertake projects related to power generation, transmission, and distribution.

#### Chemicals

Manufacturing, processing, and refining chemicals and fuels (for example, renewable fuels, petrochemicals, polymers, and specialty chemicals).

### Resources

Processing minerals and metal resources, including resources central to the energy transition and resource projects related to fertilizers (phosphates), water use and reuse, the environment, transport, ports, and site remediation and decommissioning.

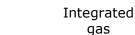
#### Markets we serve

#### Mature

#### **Energy**



Oil





Combustion energy



Midstream energy infrastructure

#### Chemicals







Refined fuels



Specialty chemicals



Sulphur recovery and re-use

#### Resources



Battery materials

### Developing

#### **Energy**



Low-carbon Renewable hydrogen energy



Networks and energy storage

Ammonia /

Methanol



Nuclear SMR



Power to X





Low-carbon fuels



Direct Air Capture



Plastics recovery



Carbon capture (Cross sector capability)

#### Resources



Bulk commodities Fertilizers



Chemicals

Resource

infrastructure





Precious metals Energy transition materials





Water

Worley Canada and

Worley Canada offices

Vancouver, BC ⊢

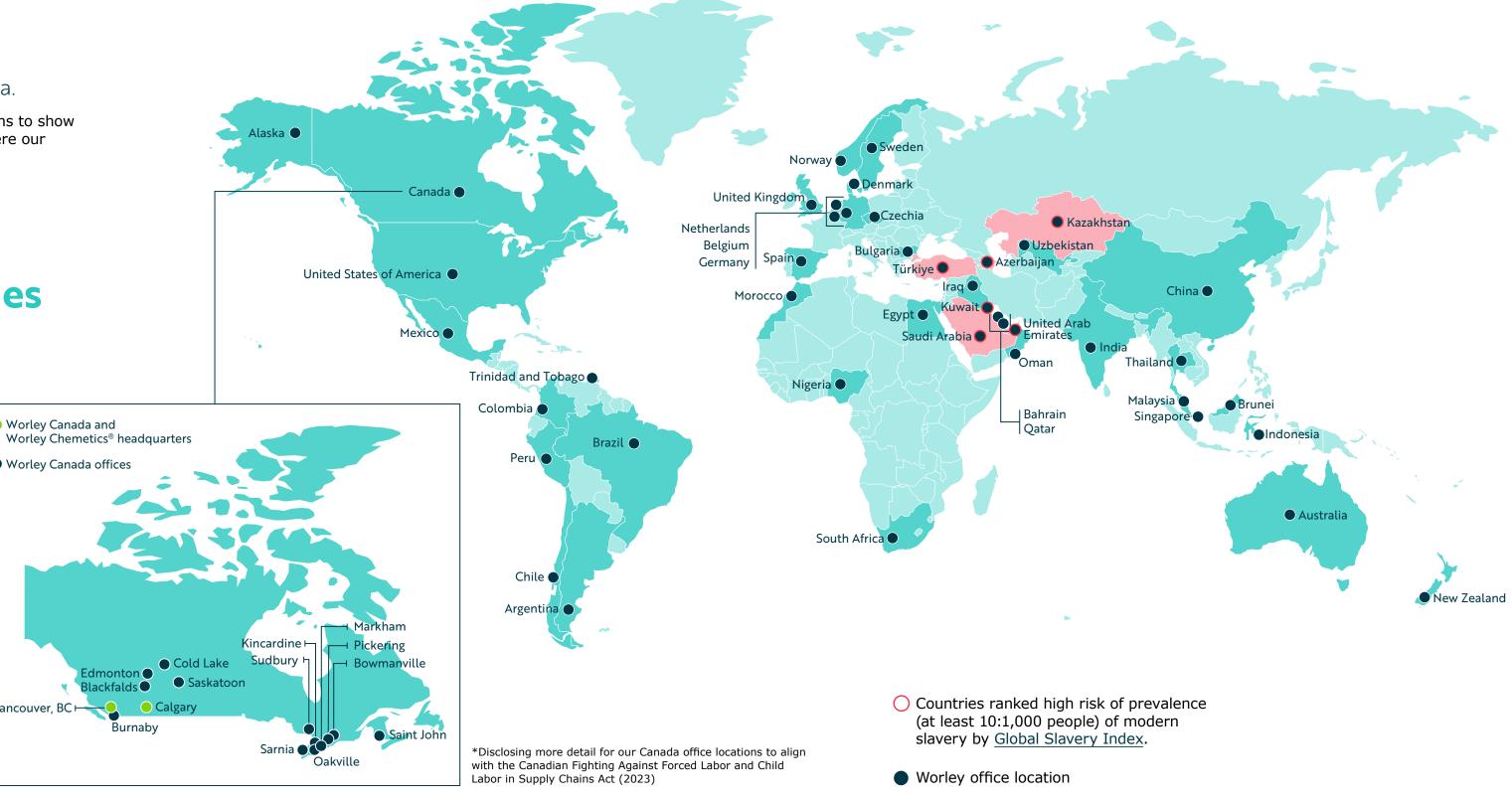
Burnaby

### **Our locations**

We're a global company, headquartered in Australia.

We have mapped our office locations to show the geographical risk profile of where our people are located.





#### CEO Message

### Structure, Activities and Supply Chain continued

### Our Supply chain

### Supply chain team

We have 1,400+ supply chain professionals supporting a complex supply chain of 6,359 direct suppliers across 75 countries, facilitating corporate procurement and project procurement.

### Supply chain activities

Our Supply Chain team partners with local and global customers. We manage the full scope of procurement, from everyday materials to long-term assets and complex services. This includes logistics, contracting, and modular construction. We source materials and equipment from local and global suppliers and import them worldwide. We also fabricate and manufacture equipment and modules, which are sold both in domestic and international markets.

### Supply chain capabilities

We offer full-service supply chain management capabilities including:

- Procurement management
- Contract management
- Supplier quality surveillance
- Logistics
- · Materials management.

### Supply chain governance

Our Supply Chain Code of Conduct guides how we implement socially responsible supply chain and anti-corruption practices. This includes working closely with our customers and suppliers as partners. Our Supply Chain team considers current issues such as modern slavery provisions, privacy laws, supplier diversity, and Indigenous supplier engagement as part of standard processes.

In FY2025, we concluded our OneSource Pilot program, which designed, built and tested the approach to consolidate our sourcing and on-boarding of suppliers across corporate and project procurement functions through one procurement system. The pilot tested the procurement system design and capability to manage suppliers through a simplified workflow, test risk-based assessment framework and supplier onboarding processes.



### **Supplier Support Hub**

In FY2025, we updated our website to enhance support for our suppliers and contractors. The site now provides guidance on how to register as a supplier and clarifies our expectations for responsible business practices.

Incorporating our core values, Supplier Code of Conduct and Modern Slavery Policy, the Supplier Support Hub reinforces our commitment to upholding human rights, preventing modern slavery, and promoting our worker welfare principles and our expectation that suppliers will do the same.

This update also promotes our Ethics Helpline, encouraging all workers in our supply chain to access our confidential channel to raise any concerns.

Click here to explore our Supplier Support hub.





### Supply chain spend

For this report, 'supply chain' refers to our direct procurement activities of goods and services. For the financial reporting period (FY2025), our global total spend was \$10.3b AUD across 6,359 suppliers, representing 99% of our spend. Our project procurement, direct project spend, represents 93% of our supply chain spend. Our corporate procurement, which supports running the company, is 7%.

Our overall spend remained consistent year over year. FY2025 reflects a dynamic project portfolio, with several projects concluding and new ones commencing, resulting in shifts in spend across regions. Our Canada operations' spend was \$649m CAD. We imported \$24m CAD of material and equipment from 27 countries.

We utilize the United Nations Standard Products and Procurement Code (UNSPC) to guide the categorization of our spend. In FY2025, our top spend categories included mechanical equipment 23% and site services 15%. 85% of our spend is from 10 countries including the United States, Saudi Arabia, Australia, Canada, India, France, United Kingdom, Netherlands, Germany and Spain.

### Our spend

\$10.3b

Procurement spend<sup>1</sup>

60%

With top 100 suppliers

6,359

Direct (Tier 1) suppliers

**Project procurement 93%** 





#### **Corporate procurement 7%**



**Facilities** 



Professional services

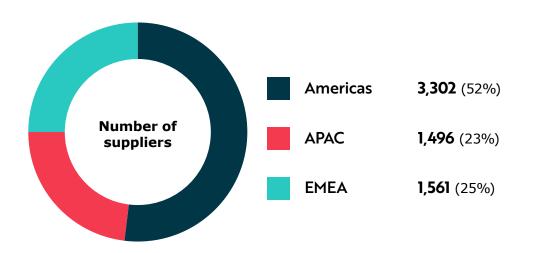


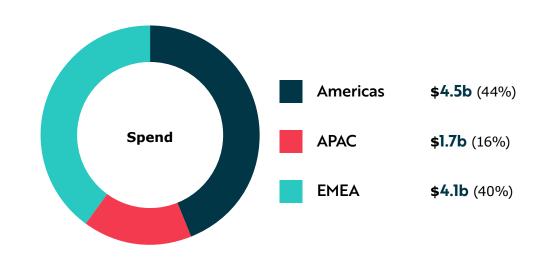
Information technology



Other miscellaneous

### **Regional spend**





<sup>1.</sup> Annual total spend from project and corporate systems; includes spend on customer paper. Dollar figures are presented in Australian dollars, unless otherwise specified.

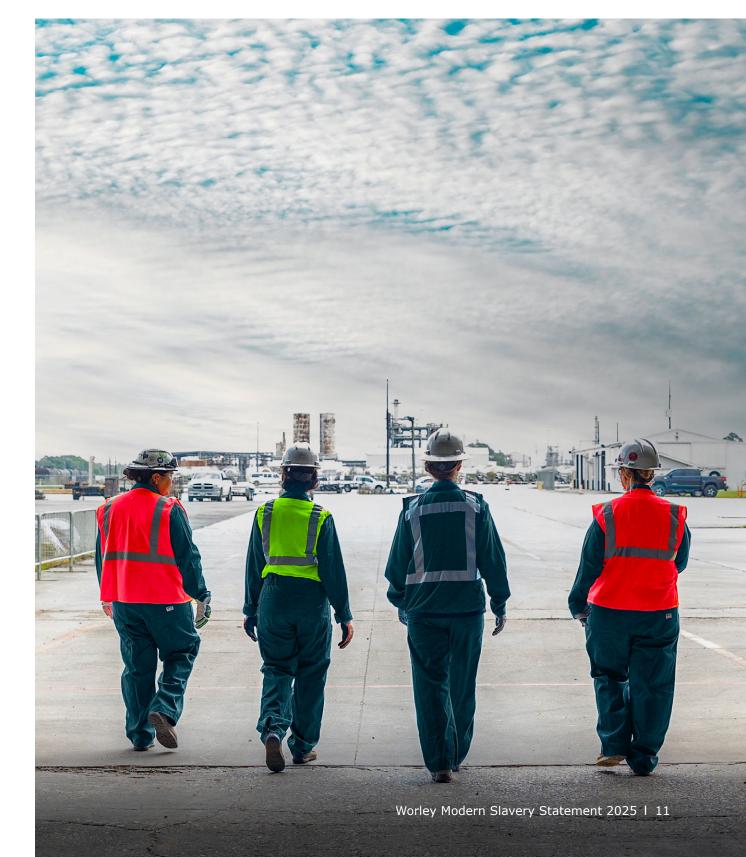
We use the UNSPC taxonomy to classify procurement spend for our business and geographies.

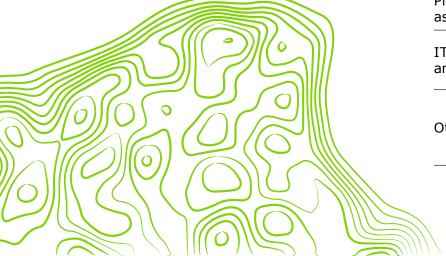
By standardizing the categorization of materials and services we purchase across all systems, we enhance our visibility over which commodities we procure and which suppliers we choose to partner with. We have not yet classified all our total procurement spend against the UNSPC taxonomy. In FY2025, we have classified 89% of our top sourcing categories.

### **Top sourcing category snapshot**

This represents 89% of procurement spend that has been classified using the UNSPC taxonomy.

Category		Percentage of procurement spen			
Mechanical equipment	Filtration and separation systems, separating equipment, production systems equipment and separators, containers and storage and pumps	23%			
Site services	Engineering consulting and professional services, commissioning and startup services and civil engineering services	15%			
Construction equipment and supplies	Structural steel, heavy construction machinery and equipment, structural components and basic shapes, material handling machinery and equipment, concrete, cement and plaster	8%			
Construction services	General construction, earthwork services, surface treatment and coating services, specialty insulation and pipelines	8%			
Structures	Building, transportation, urban, hydraulic and maritime infrastructure	7%			
Banking and investment	Financial services	6%			
Human resources services	Human resources services, staff recruiting services, insurance and retirement services	5%			
Electrical equipment	Electrical regulators, electrical material and electrical cable and accessories	5%			
Facilities	Safety services, real estate services and environmental services	4%			
Piping and fabricated assemblies	Pipe fittings, stainless steel pipes and carbon steel pipes	4%			
IT equipment, programs and services	Operating software, business and corporate management consultation services and computer equipment and accessories	3%			
Other categories	Business services, travel and events, tax expenses, HSE equipment, instrumentation, drilling, well assemblies and subsea production, manufacturing components and supplies	12%			





**Top sourcing snapshot by country** 

We have 6,359 Tier 1 suppliers in 75 countries. The below top 10 countries account for more than 85% of our spend.

Supplier Country	Top Category
United States	<ul><li>Construction equipment and supplies</li><li>Mechanical equipment</li><li>Construction services</li></ul>
Saudi Arabia	<ul><li>Site services</li><li>Structures</li><li>Mechanical equipment</li></ul>
Australia	<ul><li>Mechanical equipment</li><li>Site services</li><li>Human resource services</li></ul>
Canada	<ul><li>Construction services</li><li>Mechanical equipment</li><li>Electrical equipment</li></ul>
India	<ul><li>Banking and investment</li><li>Mechanical equipment</li><li>Facilities</li></ul>
France	<ul><li>Mechanical equipment</li><li>Piping and fabricated assemblies</li><li>Manufacturing components and supplies</li></ul>
United Kingdom	<ul><li>Mechanical equipment</li><li>IT equipment, programs and services</li><li>Banking and investment</li></ul>
Netherlands	<ul><li>Mechanical equipment</li><li>Human resource services</li><li>Electrical equipment</li></ul>
Germany	<ul><li>Mechanical equipment</li><li>Electrical equipment</li><li>Construction services</li></ul>
Spain	<ul><li>Mechanical equipment</li><li>Piping and fabricated assemblies</li><li>Construction equipment and supplies</li></ul>

	<b>United Kingdom</b>	Netherlands	Germany	France	Spain
Supplier count	101	124	53	21	13
\$AUD	\$266m	\$246m	\$172m	\$419m	\$170m
Spend percentage	3%	3%	2%	5%	2%
	Canada <sup>1</sup>	United States	Saudi Arabia	India	Australia
Supplier count	357	701	85	42	115
\$AUD	\$529m	\$3,093m	\$1,911m	\$525m	\$598m
Spend percentage	6%	34%	21%	6%	7%

- Country ranked high risk of prevalence (at least 10:1,000 people) of modern slavery by Global Slavery Index. For more information on risk in our supply chain refer to page 24.
- 1. The types of materials and equipment we have imported into Canada include: Piping materials (valves, fittings, gaskets), Process equipment (vessels, regulators, meters, instruments), Electrode chemical materials (anodes), Electrical equipment (motors, cable), IT equipment, Chemicals, and Steel.

# **Our Approach and Actions**

### Our approach

Respecting, protecting, and promoting human rights is fundamental to delivering a more sustainable world.

Our commitment to human rights includes managing risks related to modern slavery. This encompasses our people, companies we partner with, our supply chain, and the communities in which we operate. We manage our modern slavery-related risks by taking a human rights risk approach guided by the UN Guiding Principles on Business and Human Rights (UNGPs). This helps identify and detect potential human rights issues to reduce the risk of exploitation and modern slavery.

### Human rights in practice framework

Our Business and Human Rights in Practice framework puts the UNGPs into action and guides our program of work.

#### **Improve**

Continuous evolution of best practice

### Report

Transparent communication on progress

#### **Monitor**

Measure and track effectiveness



#### Commit

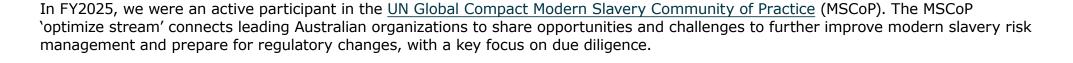
Organizational commitment and accountability to respecting, protecting and promoting human rights

#### **Assess**

Risks to people and opportunities to improve conditions

#### Act

Integrate proactive prevention and remedial action





### **Our actions**

Our FY2025 actions and deliverables demonstrate our framework in practice.



#### Commit

Our commitment to respecting, protecting, and promoting human rights

Commenced operationalizing our



#### Assess

Our approach to assessing risks to people and looking for opportunities to improve conditions



Our integrated approach to prevention and remediation



#### **Monitor**

Measuring and tracking effectiveness



### Report

**Transparent reporting and** communication on progress



#### **Improve**

**Continuous evolution** of best practice

- Engagement with our governance committees and Worley Board
- Modern Slavery Policy
- Conducted a human rights salience assessment for our operations
- Undertook a deep dive on risks associated with contract types
- Enhanced our Responsible **Business Assessment**
- · Held our annual risk and control effectiveness workshop to review risks
- Enhanced our due diligence checks on third parties

- Developed a Worley specific e-learning module dedicated to modern slavery
- Refreshed our Code of Conduct training and included content on modern slavery
- Delivered interactive workshops for our People teams
- Operational engagement and awareness raising in higher risk locations
- · Further collaboration and testing of worker welfare project self-assessment
- Targeted construction initiatives and engagement

- Modern slavery focus included in FY25 Internal Audit program
- Conducted review of Ethics Helpline aligned with UNGP guidance
- Reported and published our progress annually on our website
- Norwegian Transparency Act (2024/2025) Statement
- UN Global Compact Communication on Progress
- Achieved an 'A' rating from Monash University for the second consecutive year for our FY2022 and FY2023 statements.
- Improved our human rights performance as measured by corporate sustainability benchmarks (ESG rating agencies)
- Outlined our program goals to support our KPI's

Further details on these actions are outlined throughout this statement.





### Our training and awareness raising

We're improving capability and deepening our people's understanding of modern slavery to strengthen how we manage risks and uphold human rights across our business. Our people have access to dedicated intranet pages with key information and resources on human rights and modern slavery prevention. We provide targeted briefings and guidance to key groups and raise awareness with our people by sharing updates through our internal communication channels.

In FY2025, we focused on raising awareness and strengthening our approach to modern slavery prevention. We rolled out our updated Modern Slavery Policy and commenced operationalizing our policy (Read more on pg 20), clarifying expectations of our senior leaders and all our people. We launched a dedicated intranet page with tools, resources, and guidance for all our people, and encouraged teams to engage with our Safety Moments on Worker Welfare Principles. This year, we marked Human Rights Day (December 10) as a key moment to reinforce our commitment and as another opportunity to promote our policy, increase awareness of our human rights framework, and remind our people of their role in helping prevent modern slavery.

We also continued to build capability through our mandatory Code of Conduct training, the development of our new modern slavery e-learning module, and targeted workshops for the People team.

### **Groupwide training**

#### **Code of conduct induction**

Our Code of Conduct is grounded in our values and sets the standard for how we work. It guides our everyday decisions and reinforces our commitment to ethical, respectful, and responsible behavior. New starters, with access to online learning, receive online Code of Conduct induction training upon joining Worley. This training includes our commitment to human rights and makes it clear that we do not tolerate any activity linked to human rights abuses, including modern slavery. It also helps our people recognize the signs of modern slavery, understand how to reduce risk, and know how to report any concerns.

#### **Code of Conduct Refresher**

Our people must complete an annual Code of Conduct refresher training to stay informed and aware. In FY2025, the course included a dedicated section on modern slavery. It covered common forms of modern slavery - human trafficking, forced labor, bonded labor, child labor, and deceptive recruitment - and highlighted vulnerable groups and higher risk sectors. The module equipped learners to recognize the signs of modern slavery, using real-life examples and a knowledge check to reinforce understanding. For our field-based people without access to online systems, we provided a Toolbox Talk version of the training, which focused on the types of modern slavery, our expectations for protecting working conditions, managing risks, and how to report concerns via our confidential channels.

### **Role specific training**

### Modern slavery workshops

In FY2025, we continued to build functional capability through targeted, interactive training. We ran one-hour workshops for team members from our People function who were nominated by their leaders for deeper, role-specific training. Each session was interactive and based on real-world case studies. Workshops were tailored to each audience, focusing on the situations they are most likely to face and discussing actions they can take to manage risk.



### **Worley Modern Slavery** e-learning module

In FY2025, we developed and launched a dedicated modern slavery e-learning module to strengthen awareness of modern slavery across our business and supply chain.

Hosted on our internal learning platform, the 30-minute interactive module is given to new starters upon onboarding, and in FY2026, will be rolled out to key functional and operational groups and promoted to all our people. The module introduces the different forms of modern slavery, how to identify and manage risks, and the importance of positive labor and welfare standards in preventing exploitation. It also highlights our proactive prevention program and reinforces our shared responsibility to respect human rights and prevent modern slavery.

### FY25 training at a glance

### **Online Code of Conduct induction**

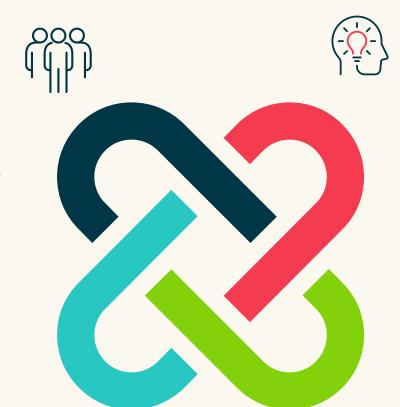
• Audience: Worley new starters<sup>1</sup>

• Global completion: 1,341<sup>2</sup>

• Source: Third party provider

• Course length: approx. 25 mins

Languages: 10 (including English)



#### **Annual Code of Conduct Refresher**

#### **Toolbox Talk:**

- Audience: Our people without access to online Learning Management system
- Global No.: 3,100+<sup>3</sup>
- Source: Internal design
- Toolbox topic length: approx. 5-10 mins
- Languages: Resources provided in English and translated as required

#### Online course:

- Audience: Our people with access to online Learning Management System
- Global No.: 36,000+4
- Source: Third party provider
- Course length: approx. 45 mins
- Languages: 13 (including English)



### Modern slavery workshops

- Audience: Nominated by key functional leaders
- Source: Internal design
- Global No. of completions: 77<sup>5</sup> Workshop length: approx. 1 hour

### Online modern slavery training

- Audience: Members of key functions and self-enrollment
- Source: Third party provider • Global No. of completions: 1306 • Course lengths: 10-30 mins

In FY2026, we will replace these modules with our new Worley Modern Slavery e-Learning module (refer case study on page 15)

- 1. With access to online learning.
- 2. No. of Online Code of Conduct Induction in Canada 84.
- 3. No. of Toolbox annual Code of Conduct refresher in Canada 1,100+.
- 4. No. of Online annual Code of Conduct refresher in Canada 2,900+.
- 5. No. of Modern slavery workshops in Canada 7.
- 6. No. of Online modern slavery training in Canada 10.





### Our engagement and consultation

### Internal consultation, suppliers, **business partners**

We expect and encourage our people, suppliers, and business partners to speak up about any concerns or breaches of our Code of Conduct via our Ethics Helpline, which supports multiple languages and is available 24 hours, seven days a week. For more details on our helpline, visit our grievance and remediation section page 28 which provides more details on our Ethics Helpline.

All policies and procedures are accessible to our people via our intranet. We actively encourage our people to suggest improvements through our knowledge and management systems. When we introduce new policies and procedures or update existing ones, we share the changes on the intranet and include them in a quarterly summary for key stakeholders. These regular updates help us keep improving and ensure our knowledge and management systems remain current and effective.

### **External partners**

We have clear processes in place to manage joint ventures and screen potential partners. Every partner must meet or exceed the standards set out in our policies, including our Code of Conduct. We carry out ethical due diligence on all business partners to ensure alignment with our values. For more details, see our due diligence section on page 26.

### **Corporate Sustainability benchmarks**

We actively engage with ESG ratings agencies, including MSCI, Sustainalytics, S&P Global CSA (DJSI), and EcoVadis, to benchmark our performance on human rights and modern slavery. This ongoing engagement helps us improve our disclosures. In FY2025, we strengthened how we track and report progress, which saw positive progress in our human rights scores across several assessments.

We stay alert to emerging practices and rising expectations in our sector, helping to ensure our approach remains transparent, informed, and future focused.

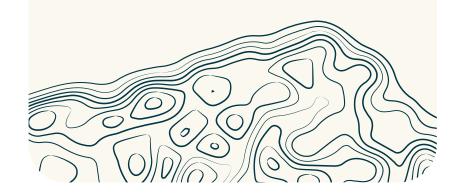
### **Partnering with industry groups**

Collaboration is key to tackling modern slavery. We partner with the United Nations (UN) Global Compact and Building Responsibly to strengthen our approach to human rights and modern slavery. In FY2025, we also engaged an external network of risk leaders to share insights and learn from others tackling similar challenges.



#### **United Nations Global Compact (UNGC)**

We are a signatory to the UNGC framework, based on 10 universally accepted principles in the areas of human rights, labor standards, environment, and anti corruption. The UNGC supports the implementation of the UN's Sustainable Development Goals to drive change across multiple sectors and geographies. Each year, we publish a Communication on Progress (COP) report to show how we're delivering on our sustainability commitments. We participated in the UNGC Business & Human Rights Accelerator program and, in FY2025, became an active member of the UNGC Modern Slavery Community of Practice.





#### **Building Responsibly**

We're an active board member of Building Responsibly, a global group of leading engineering and construction companies working together to protect and promote workers' welfare and rights. The group, guided by 10 Worker Welfare Principles, creates practical tools and resources to help companies lift standards across the sector. In FY2025, we continued to collaborate on the development of the project self-assessment tool and joined a dedicated industry working group. We shared how we're putting the principles into practice, including embedding them in our Modern Slavery Policy.

The principles are also embedded within our project self-assessment tool and questionnaires used for higher risk suppliers. To further raise awareness of the principles, we developed a suite of safety moments designed to explain and reinforce each principle.

#### **Building Responsibly Worker Welfare Principles**



Workers are treated with dignity, respect and fairness



Workers are free from forced, trafficked and child labor



Recruitment practices are ethical, legal, voluntary, and free from discrimination



Freedom to change employment is respected



Working conditions are safe and healthy



Living conditions are safe, clean and habitable



Access to documentation is unrestricted



Wage and benefit agreements are respected



Worker representation is respected



Grievance mechanisms and access to remedy are available



### Using valuable insights from our people

Our Psychosocial Health Program focuses on identifying, assessing, and reducing psychosocial hazards and risk factors that can arise from how work is designed, the work environment, or experience in the workplace through interactions and behaviors.

Over the past two years, we've assessed psychosocial risks across our workforce, an essential step in ensuring the safety and welfare of our people. This includes conducting regional assessments to better

understand the prevalence of psychosocial factors that may cause psychological harm or influence vulnerability, including indicators of potential exploitation or coercion.

So far, more than 16,000 of our people have engaged in the program, giving us valuable insights into people's experiences, emerging risks, and trends. We're integrating insights and tailoring prevention response strategies, linking our work on human rights, modern slavery prevention, and respect at Worley to help ensure we have a safe, healthy, and respectful workplace for all our people.

### Our governance

Our Board has ultimate accountability to ensure we meet our applicable safety, performance, and governance standards. Our focus on human rights and response to modern slavery is governed at the Board level through the Audit and Risk Committee.

Our Executive Human Rights and Diversity, Equity & Inclusion Committee, supports the Board with strategic guidance on human rights-related matters. Jointly chaired by our Chief People Officer and Executive Group Director, Sustainability and Corporate Affairs, the committee tracks progress on key objectives, ensures alignment with international standards and regulatory requirements, and strengthens how we manage people-related risks.

Our Modern Slavery Working Group (MSWG), jointly chaired by our Executive Group Director Sustainability and Corporate Affairs and our Group General Counsel, comprises senior representatives from Risk, Ethics & Compliance, Legal, People, Project Delivery, Supply Chain and Sustainability. The MSWG's purpose is to:

- be the overarching body that represents and advocates modern slavery prevention and protection of human rights-related activities throughout the Group
- provide support on important activities in the modern slavery program, including risk assessment, the annual modern slavery statement, and provide support for modern slavery prevention initiatives
- ensure that modern slavery prevention and the protection of human rights become core to our culture. This means they are defined, measurable, and reported on a consistent basis, incorporated into strategies, and reflected in both what we do and do not do as a business.

We use formal project management methodology for our prevention program, including an agile scrum board to track initiatives. We inform the MSWG of progress using a Modern Slavery Scorecard which tracks the implementation of initiatives and our KPI performance.

In FY2025, we refined the structure of our working group meetings to enhance global collaboration and representation across multiple time zones. While the new cadence includes five meetings per year, reduced from six, we maintained overall engagement hours by introducing two extended global meetings. The MSWG provided valuable input for our FY2025 program plan, new e-learning module and participated in our annual risk review workshop, providing input into areas of risk, involvement, and effectiveness of our controls.

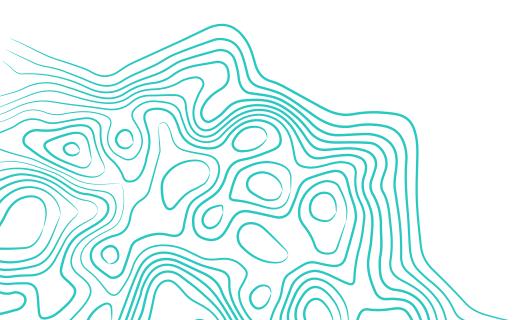
### **Leadership and management**

Our Executive Group Director, Sustainability and Corporate Affairs, is the executive sponsor of our Human Rights in Practice program, which includes our modern slavery prevention program. Our Human Rights team, part of our global Sustainability Performance team, leads the delivery of this work. They track progress, report on key performance indicators, and keep our governance committees informed and aligned.

Across the Group, all leaders are responsible for promoting our policy, commitments, clearly communicating our principles, and ensuring they are upheld in practice.



1. The board of directors for Worley Limited.



### Governance continued





### Board engagement and risk deep dive

The Worley Board is responsible for setting the strategic direction and policies of the Worley Group to create value for shareholders and other stakeholders. It is accountable to shareholders for the Group's overall performance.

The Audit and Risk Committee (ARC), oversees the integrity of the Group's financial reporting, risk management framework, and internal controls.

In FY2025, we presented a deep dive paper on modern slavery risk to the Worley Board. The paper explored our current operating landscape, highlighted multiple interconnected risk factors, and outlined progress of our modern slavery program. The update confirmed strong foundations with a clear path forward, focused on operationalizing and embedding policy through engagement, building capability and maturing our due diligence practices.



### **Operationalizing our Modern Slavery Policy**

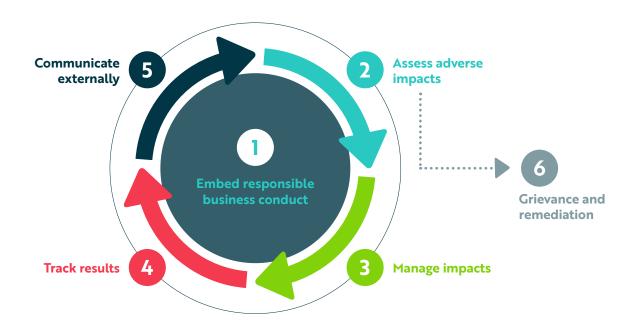
In FY2024, we updated our Modern Slavery Policy to further align with our commitments to the UNGC Principles on Human Rights and Labor Rights and the Building Responsibly Worker Welfare Principles.

We rolled out our policy by raising awareness with group-wide communications and included information on our policy in our new Modern slavery e-learning module (see page 15) for details.

In FY2026, we plan to further operationalize our policy by implementing a Modern Slavery Standard, which will translate our commitments into actionable procedures and processes. The standard will ensure consistency and clarity in applying labor standards and will also set the foundation for measuring effectiveness.

### Human rights due diligence

Our approach to conducting human rights due diligence is guided by the UNGPs, as shown in the figure below.



Source: OECD Due Diligence Guidance for Responsible Business Conduct

### **Embed responsible conduct**



Step 1: Embed responsible business conduct into policies and management systems.

Our Code of Conduct sets out what we must do, our responsibilities, and the ethical standards we uphold. It includes our commitment to respecting human rights and preventing human rights abuses such as modern slavery.

Our Human Rights and Modern Slavery policies are aligned with international standards and outline our commitment to maintaining the highest standard of business conduct and ensuring people are treated with dignity, respect, and fairness.

Our policies, which are reviewed periodically and updated at minimum every two years, set out our standards for professional behavior, ethical conduct, and compliance with all laws and regulations. They include:

Our policies	What's included?
Human Rights Policy	Our commitment to respecting and protecting the fundamental human rights of the people we engage and interact with.
Modern Slavery Policy	Our commitment to the prevention of modern slavery and ensuring people are treated with dignity, respect and fairness.
Safety, Health, and Wellbeing Policy	Our commitment and application of laws related to providing a physically and psychologically safe, healthy, and respectful environment.
Diversity, Equity, and Inclusion Policy	Our commitment to a diverse, equitable and inclusive workplace where everyone can fully participate and maximize their potential and affirms our stance against discrimination of any kind.
Respectful Workplace Behaviour Policy	Our commitment to creating a safe and respectful workplace where harmful and disrespectful behaviours are not tolerated.
Sustainability Policy	Our commitment to support progress towards achieving the United Nations Sustainable Development Goals and upholding the principles of the UNGC.
Whistleblower Policy	Our commitment to ethical business practices and investigating and reporting any unethical conduct, including assurance that a reporter will be protected against adverse actions.
Anti-Bribery and Corruption Policy	Our commitment to honest and ethical conduct in compliance with all applicable anti-bribery and corruption laws.
Supply Chain Code of Conduct	Our expectations of ethical conduct of suppliers and contractors aligned with our Code of Conduct and policy commitments.

Our Code of Conduct is available in 16 languages, including English. We communicate and make all of our policies available to our people via our knowledge management system, internal intranet, and are also available for external stakeholders on our corporate governance website.

#### CEO Message

### Due Diligence continued

### **Assess adverse impacts**



Step 2: Identify and assess adverse impacts in operations, supply chains, and business relationships or stakeholders.

### Risk management and internal controls framework

Our ability to identify and assess adverse impacts in operations, supply chains, and business relationships or stakeholders is underpinned by our approach to risk management and our culture of encouraging transparent communication.

Our risk management and internal controls framework empowers our people to manage business risks, including modern slavery. We align with the ISO 31000:2018 Risk Management - Guidelines Principles and Framework, and our roles and responsibilities around the Institute of Internal Auditors' Three-lines Model. To complement our assessment of modern slavery risks, we use the UNGPs.

Our Sustainability and Ethics & Compliance teams (part of the second line) manage our human rights and modern slavery prevention program and support the first line with education and independent challenge. They also ensure legislative requirements are managed.

Our enterprise risk taxonomy includes human rights and modern slavery as a category. This enables us to aggregate risks and review specific modern slavery risks as identified across the business.

#### Internal audit

Our Internal Audit function operates independently to provide objective assurance and advisory services that support the enhancement of business operations. Using a risk-based methodology aligned with our strategic objectives and policy framework, the Internal Audit team evaluates the effectiveness of risk management, internal controls, and governance practices. The audit program includes regular reviews of the implementation of key policies, including those addressing third party risk and modern slavery, to help ensure compliance and drive continuous improvement.

Our internal audit program includes the evaluation, and effectiveness of our modern slavery policy, controls, and practices, which supports preventing and or detecting poor labor practices and or modern slavery risks in our operations and or supply chain.

### **Create | Protect | Anticipate**

#### **Enablers**



#### **Culture and values**

- Purpose led with tone from the top
- Informed decisions through exploring uncertainty and challenging thinking



- Insights and forward-looking data
- Macro trend analysis and digital tools



- Engaged business with continuous learning
- Risk team expertise and competency framework



### Governance

- Business systems, processes and controls
- Risk tolerance to drive risk escalation and decision making

**Board and Committees** Governance and oversight of enterprise risks

- Sets strategy, ambition and risk appetite
- Strategic decision making and alignment with remuneration
- Risk reporting
- External disclosures

#### **Chief Executive Officer**

### **Group Executive**

Manages and allocates resources to deliver strategic objectives and designated risk owners for our enterprise risks

- Strategy execution and transformation
- Business performance and Key Risk Indicators
- Risk-informed decision making
- Manage risk and report to Board

#### **External audit**

Provides independent assurance

#### First line – risk ownership

The business and all employees

Responsible for owning, managing and reporting risk in their operations and ensuring controls are in place.

#### Second line – risk enablement

Group functions

Support to first line and provide independent challenge. Risk group responsible for risk framework and policies to enable a consistent approach to risk across the Group.

#### Third line – risk assurance

Internal audit and third party audit providers

Responsible for independent assurance on effectiveness of the control environment in relation to risk materiality.

**Risk process** 

Engage, consult, communicate | Set objectives and context | Identify, analyze, evaluate Innovate, plan, act | Monitor, review, report | Learn, improve, perform

### **Modern Slavery risks**

Modern slavery exploitation includes slavery practices, human trafficking, forced labor, child labor, debt bondage, deceptive recruitment, and domestic servitude.

Modern slavery practices that we are most exposed to across our operations, supply chain, and stakeholder partnerships include:

- human trafficking
- forced labor
- child labor
- deceptive recruitment
- bonded labor.

Given the nature of our work and the industries we work in, the most vulnerable groups include construction workforces, minority groups, migrant workers, and young workers.

Modern slavery risk is a key feature of our enterprise risk management system. When assessing risk to people, especially vulnerable groups, we consider a range of interconnected factors: the sector, geography, project scope, products and services, and the partner, suppliers, and stakeholders.

Our MSWG conducts a formal annual review of our salient modern slavery risks, risk treatments, and control effectiveness. In FY2025, the working group reviewed our risks, degree of involvement, and the effectiveness of our controls. The working group uses our company risk classification matrix, aligned with the UNGPs on Business and Human Rights, to understand risks where we may cause, contribute to, or be directly linked to modern slavery in our operations, supply chain, or stakeholder relationships.



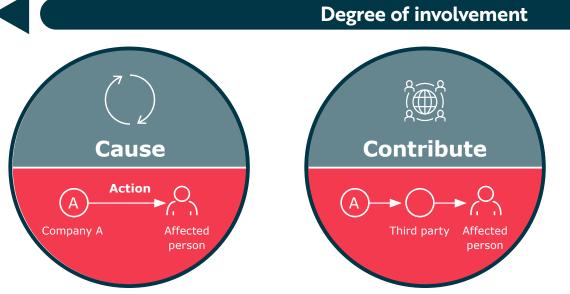
### Fair wages review

Aligned with our remuneration internal policy and standard, we follow local laws and requirements in all our remuneration programs.

Our local People teams ensure everyone is paid at or above the legal local minimum wage for their role and location. In FY2025, we ran a detailed review, comparing the lowest eligible salary for our people in each subgroup to the applicable minimum wage to confirm compliance. Looking ahead, we're focused on strengthening our systems and governance to keep monitoring and managing this effectively.

### **Degree of involvement**

We know that the greater our involvement, the greater our responsibility to act, by addressing impacts, remediating and preventing harm.



A company directly uses modern slavery through its own actions.

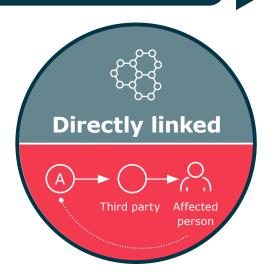
Example: A project is under pressure to deliver for the customer and chooses to directly use exploitative labor practices such as forced labor to increase productivity and reduce costs.

The company is required to take immediate action to cease the activity causing the harm, prevent its recurrence and provide for remediation.

A company contributes to the use of modern slavery in collaboration with a third party.

**Example:** A project engages a labor hire company without appropriate due diligence and finds they are deceptively recruiting people by making them pay upfront costs for their employment and deducting repayments for debts.

The company is expected to take steps to cease or prevent its contribution and provide or cooperate in remediation efforts as appropriate to its share of responsibility.



A company can be directly linked to modern slavery through its relationships with other entities such as suppliers, contractors or business partners.

**Example:** A project engages a supplier not realizing that deep within the supplier's supply chain they are sourcing raw materials that use child labor.

The company is expected to use its leverage to influence and prevent impacts where possible; however, is not required to remediate.

### Risks in our operations, our supply chain and with our stakeholders

Our exposure to modern slavery risk is shaped by a range of interconnected factors across our operations, supply chain, and stakeholder relationships. In our operations, risk is influenced by the sectors we support, the nature of our projects, where we operate, and how we engage our workforce. In the supply chain, complexity is a key driver—affected by the number and location of suppliers, including those beyond Tier 1, and the type of goods and services we procure. Our stakeholder risk of modern slavery is influenced by our role in business relationships with customers, joint ventures, and community organizations we partner with.

Risk	DOI	Туре	Risk	DOI	Туре	Risk	DOI	Т	
<b>Sector</b> – The energy, chemicals and resources sectors can carry a higher risk due to use of lower skilled labor in energy manufacturing, outsourcing of labor in the resources sector and through procurement of raw material for the chemicals sector.		•	Supply chain complexity – The potential for lack of full visibility and control over all suppliers and subcontractors in multi-tier global supply chains can increase risks of modern slavery.		<b>Customer-controlled operations</b> – Customer-controlled projects can carry higher risk as the customer stipulates the location, site standards and subcontractor arrangements.				
<b>Geographic location</b> – Countries in which we operate that have weaker rule of law, high levels of corruption or conflict, and/or a higher presence of vulnerable populations or modern slavery prevalence increases risk.		•	stipulate that we use their suppliers, which can increase our risk of modern slavery as we are not directly responsible for due diligence checks.  Products and services – Certain products and services we use including electronics and IT equipment, industrial equipment and materials, facilities management and security services, logistics and transport and garment or PPE equipment, can carry higher risks due to being sourced or manufactured in higher risk		of modern slavery as we are not directly responsible for due increase our risk as we are not in control		<b>Non-controlling joint venture partner</b> – Partnership arrangements where we are not the controlling entity can increase our risk as we are not in control of systems and processes governing projects.		
<b>Project scope</b> – Different project scopes and phases can carry varying degrees of risk due to differences in workforce demands, reliance on complex supply chains and use of subcontractor or migrant workforces, particularly during procurement and construction phases.		•			Country sponsor relationships – Where there is a legal requirement to work with local partners and or this can increase our risk through the actions and or the partner.		onsors,		
<b>Commercial contract</b> – Different contracting models present different risk profiles based on our responsibilities for oversight of workforces, including subcontractors and or suppliers.		•	geographies or exposure to vulnerable workforces.			Charitable volunteering and donations – Risks can be present in charitable activities, including financial donations and skilled volunteering, posing a potential risk via the Worley Foundation and			
<b>Workforce engagement</b> – Contingent, temporary work or third-party agency engagements can carry higher risk due to engagement with migrant workforces.			KEY Modern Slavery Risk Type			country Corporate Social Responsibility (CSR) committees that support local not-for-profit community organizations.  Degree of involvement (DOI)			
<b>Operational accommodation and camp services</b> – Remote workforces with camp accommodation can carry an increased risk of exploitation due to a combination of isolation, oversight, and/or management of the camp.			Child Labor Debt Bondage Forced Labor	Deceptiv Recruitme		Iman All ficking Cause Contribute Dir	ectly linke	ed	



### **Proactive due** diligence

In FY2025, we conducted an operational human rights salience assessment to strengthen our proactive due diligence and understand our most salient issues.

We prioritized operational risks and developed our methodology guided by the UNGPs.

To inform the assessment, we ran workshops with a cross-section of business stakeholders, to:

- 1. Determine relevant human rights issues
- 2. Assess the severity of the impact to people
- 3. Consider the degree of involvement and likelihood
- 4. Review existing mitigation measures and determine current effectiveness
- 5. Prioritize salience issues for action.

The process identified three prioritized salient human rights issues:



#### **Working time**

Risk of excessive work hours over long periods.



#### **Discrimination**

Risk of unequal treatment during the employment lifecycle.



#### **Deceptive recruitment**

Risk that third party agencies use modern slavery practices.

Working groups are now developing enhanced mitigation actions, which will be monitored and governed by the Human Rights Diversity Equity and Inclusion Committee. We also plan to expand the assessment into our supply chain.



### **Construction workforces**

Recognizing construction as a higher risk sector, we launched several key initiatives in FY2025 to raise awareness and strengthen worker welfare standards and prevent modern slavery:

- we revised our Construction Supervisor Handbook to explicitly outline our commitments and leadership responsibility to uphold labor standards, worker welfare, and ethical business practices
- we updated the construction onboarding pack to include information on worker welfare standards, ensuring that all new hires are informed of our expectations

- we have updated our Camp Accommodation Facilities Standard for on-site project accommodations to ensure it is aligned with our welfare principles and standards
- we created a suite of safety moments aligned with each of the worker welfare principles. These are available to our construction teams to use in toolbox talks to further raise awareness and reinforce our standards with our craft workforces.

We shared these initiatives and updates with our construction group through senior leadership and made all resources available on our construction intranet.



### **Assessing higher risk** suppliers in Canada

In FY25, we commenced a supplier risk assessment for selected commodities associated with a higher risk of forced labor.

The assessment leveraged the Building Responsibly supplier assessment questionnaire and tool, complemented by desktop due diligence processes, including Dun & Bradstreet (D&B) screening and our new third party due diligence platform' (Refer to page 26 for more information).

We focused on direct Canadian suppliers of cleaning and janitorial services, companies that procure steel and or transportation companies

and based on their risk profile, total spend, and relevance to our supply chain.

The assessment covered 44 suppliers, representing a total spend of \$116m CAD during the FY2024 financial year.

Our Canada Supply Chain team engaged suppliers to complete the questionnaire and submit supporting evidence to demonstrate compliance with our policies and worker welfare principles. Our supply chain team assesses supplier responses, and those presenting a level of risk will undergo further due diligence and will be addressed in accordance with our policy commitments.

### **Manage impacts**



Step 3: Cease, prevent, nd mitigate adverse impacts

Due diligence assists in identifying and managing risks related to modern slavery in our supply chains and operations.

When we perform due diligence on our business relationships, we look for indicators of historical or current issues related to corruption, bribery, sanctions, human rights, and modern slavery.

The level of due diligence depends on the risk categorization of the third party, i.e. low, moderate, or high. Where a higher level of risk is identified, a higher level of due diligence is applied. All aspects of our due diligence program are supported by our Ethics & Compliance team. We use a third party due diligence platform and research tools for performing due diligence and, in certain cases, engage with external due diligence providers for additional expertise.

### **Customer due diligence**

We expect our customers to have high ethical standards. Customers are evaluated through our due diligence process, and findings are logged into our sales system.

Our Ethics & Compliance and Sales teams work together to evaluate any 'red flags' discovered during the due diligence process and determine the appropriate mitigation strategy. High risk red flags require further consideration, and the related mitigation strategy requires approval in line with our procedures.

Our sales system includes an alert for higher risk geographies, which directs the user to online resources to help understand the modern slavery risks at the proposal stage, and how to contact our Ethics & Compliance team for advice on working with the customer.

### Supplier due diligence

Our Supply Chain and relevant business teams partner to manage supplier due diligence requests through various channels, including our due diligence platform. Once the assessment is complete, our Ethics & Compliance team advises the relevant teams of the due diligence results and proposed mitigations for moderate and higher risk third parties.

We also perform due diligence on our landlords and recruitment providers. Our landlords must answer additional questions to assess their modern slavery risk, such as hiring cleaning, and/or maintenance staff, and modern slavery policy details.

### Partner due diligence

Our due diligence procedures for other partners, such as agents, joint ventures, and local sponsors, include completion of a questionnaire by a potential partner to understand their program. We take a risk-based approach to assess the level of due diligence required for our partners.

The due diligence procedures for agents and joint venture partners consider their compliance program, as well as performing checks on their shareholders, senior management, and ultimate beneficial owners, to identify the level of risk and potential red flags.

After the initial internal due diligence is performed, we also engage external service providers in certain cases where there are indicators of higher risk.

The scope of our due diligence also extends to partners of the Worley Foundation. These charities and organizations undergo enhanced due diligence, including screening the board of trustees of charities and their senior management. We also monitor third parties on an ongoing basis to identify and manage any new red flags that may arise.



### Risk based due diligence and new platform

In FY2025, we lifted our ethical business practices by adopting a risk-based approach to due diligence and implementing a new due diligence platform.

This system is being integrated into our third party onboarding processes to enhance transparency and identify potential modern slavery risks across our supply chain and business relationships.

The due diligence of all third parties now involves completion of a standardized onboarding questionnaire designed to assess potential exposure to modern slavery risks. Upon submission, the platform generates an initial risk rating based on three broad risk categories, one of which specifically addresses

modern slavery. The platform's modern slavery risk rating draws on multiple indicators, including geographic, sectoral, and operational factors.

These factors are weighted and applied based on the nature of the third party's engagement and the inherent risks associated with that type of entity. The new platform also incorporates data from reputable sources, including the Global Slavery Index (GSI) country-level prevalence score.

This enhanced due diligence process allows us to proactively identify, assess, and manage modern slavery risks in a consistent and data-driven manner.

### **Track results**



Step 4: Track implementation and results

We regularly track and report the number of due diligence checks completed on third parties, including customers, suppliers, and other partners. These checks are performed periodically by the Ethics & Compliance team to monitor risk exposure. When risks are identified, they're escalated to relevant senior leaders, and mitigation plans are developed with the relevant project teams. The Ethics & Compliance team tracks the implementation of these plans in consultation with the responsible team member(s) to ensure follow-through and accountability.

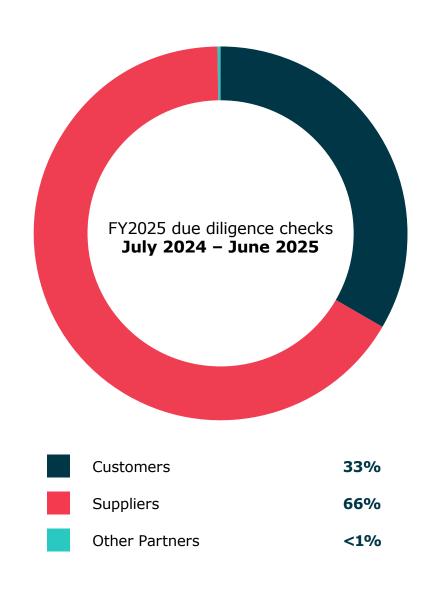
Using formal internal audit processes, our Internal Audit team also monitors the effectiveness of our due diligence process, recommends and tracks actions to drive continuous improvement.

At a program level, our progress is tracked by the Sustainability team and MSWG, using our modern slavery scorecard and program KPIs (refer to our Effectiveness section for more information).

11,701 total number of due diligence checks FY25

7,722

total number of supplier due diligence checks FY25



### **Communicate externally**



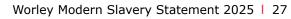
Step 5: Communicate how impacts are addressed

We report our Group's progress in our Annual Report, Group Modern Slavery Statement, and the UNGC Communication on Progress reporting.

We also report to various corporate sustainability benchmarks and ESG rating agencies. In FY2025, we improved our human rights performance ratings with some of these organizations. Read more about our performance in our ESG Databook.

We support transparently disclosing findings of modern slavery, sharing learnings, and remediation efforts. For example, in FY2022, we disclosed a finding of modern slavery in our operations and responded with remediation actions. You can read more in our FY2022 and FY2023 statements.





### **Grievance and remediation**



Step 6: Provide access to grievance mechanisms and remedy

A core aspect of any modern slavery prevention program is creating robust systems through which people inside and outside of Worley can raise concerns. Our Ethics Helpline, worleyethics.com, operates 24 hours a day, every day of the year and was created in line with the UNGPs and our Whistleblower Policy. Users can report via the website or telephone. Eight languages are available on the website, while telephone users can also request translation services.



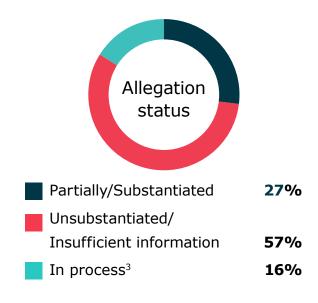
Our Ethics Helpline is promoted to our people via our intranet and posters in our locations that describe how to report a breach or concern, and information on modern slavery indicators. The poster includes a QR code, providing easy access to the Ethics Helpline webpage for people with smartphones. These posters have been translated into 17 languages.

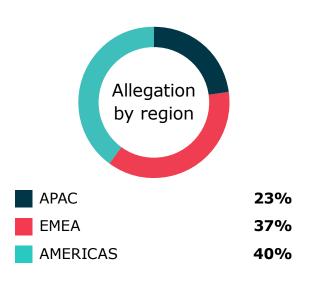
A third party provider operates our Ethics Helpline to ensure independence and data security. Reports from within and outside our company can remain anonymous. We do not reveal whistleblowers' identities without their permission, and we protect reporters from retaliation. We include this information when promoting our helpline to reduce fear that may prevent people from speaking out.

We investigate reports using a consistent approach, and actions are tracked through to completion. Reports are reviewed by our trained investigators, monitored by our Ethics & Compliance team, and supported by relevant subject matter experts. We monitor helpline data trends and use them to plan our future actions. To ensure we capture incidents, cases reported to the People team can also be recorded and tracked in the helpline by People team members submitting cases on the reporter's behalf.

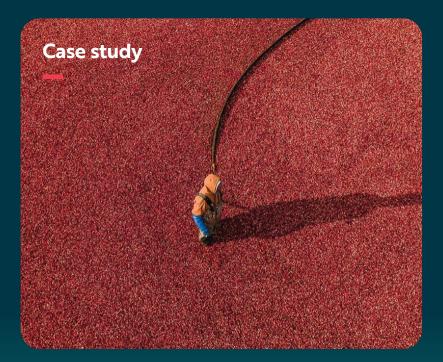
In FY2025, we responded to 3651 Ethics Helpline reports relating to a range of issues. 99<sup>2</sup> were substantiated. 0 cases of modern slavery were confirmed through the Ethics Helpline.

In FY2025 we were not aware of any substantiated findings of modern slavery including forced labor and/or child labor and no requirements for any remediation. We remain committed to remediating findings and continue to investigate<sup>3</sup> allegations relating to poor labor practices.





- 1. Total reports for Canada 26
- 2. Total cases substantiated for Canada 6
- 3. In process includes matters relating to poor labor practices.



### **UNGP** grievance mechanism review

In FY2025, we reviewed the effectiveness of the Worley Ethics Helpline, our internal and independent grievance mechanism, using the UNGP effectiveness criteria and the UNGC guidance.

Our goal was to assess how well the helpline is working and identify areas for improvement.

Our Ethics & Compliance team evaluated the program against eight effectiveness categories and 51 recommended actions, rating each as met or not met. This review helps ensure our grievance mechanism remains trusted, transparent, and fit for purpose.

Effectiveness criteria:

**Legitimate:** Intended users and stakeholder groups trust the mechanism. The entity implementing and managing the mechanism is accountable for how they conduct grievance processes

Accessible: The mechanism is known to intended users and stakeholders. People receive adequate assistance if they face a barrier to access

**Predictable:** Users are given clear information on the procedure and likely timeframes for each stage in the process. Potential outcomes are clearly stated, and the process is monitored

**Equitable:** Aggrieved parties can participate in the grievance process on fair, informed, and respectful terms by having reasonable access to information, advice, and expertise

**Transparent:** Stakeholders are informed about the grievance progress and the mechanism's performance

Rights-compatible: Outcomes and remedies align with international human rights norms and standards

**Promoting continuous learning:** Future grievances and harms are prevented by applying lessons that improve the mechanism's performance

Based on engagement and dialogue: From the design phase to implementation and review, ongoing dialogue is used to engage intended users and stakeholder groups. Dialogue is also used to facilitate redress and access to remedy.

The assessment found that our Ethics Helpline meets 84% of the effectiveness criteria. After verification by our People, Sustainability, and Legal teams, results were shared with our MSWG to inform next steps.

# **Effectiveness**



### **Assessing our effectiveness**

### Our goals and KPI's

To drive progress and measure outcomes, we've established clear goals and defined key performance indicators (KPI's). We regularly track our performance against these indicators and report progress through our Modern Slavery Scorecard to our MSWG.

Goal	KPI full list	FY2022	FY2023	FY2024	FY2025	Refer to section
Increase awareness of ethical business practices and standards	% of our people who completed Code of Conduct	80%	98%¹	98%¹	99.3%¹	Our approach and actions: Training and awareness
Active strategic collaborations, and/or memberships	No. of active collaborations and memberships	2	2	2	2	Our approach and actions: Partnering with industry groups
Maintain quarterly governance committee meetings	No. of MSWG meetings	N/A	5	6	5	Governance
Mature due diligence conducted on third parties	No. of due diligence checks	11,078	9,923	9,603	11,701	<u>Due diligence:</u> <u>Track results</u>
	No. of supplier due diligence checks	6,660	5,498	5,746	7,722	<u>Due diligence:</u> <u>Track results</u>
Enhance the accessibility of grievance mechanisms	No. of helpline languages available	1	<b>7</b> <sup>2</sup>	8	8	Due diligence: Grievance and remediation
	No. of reports confirmed as modern slavery	1	0	0	0	Due diligence: Grievance and remediation
	No. of helpline reports (total)	180	200	246	365	Due diligence: Grievance and remediation

<sup>1. %</sup> completion excludes our people in non-participating joint ventures that have alternate Code of Conduct training (JESA and NANA) and excludes workforce on extended leave or inactive at time of launch.

<sup>2.</sup> Number of languages available for online intake form, translation available on request for telephone.

Purpose, Ambition, Strategy and Values

Structure, Activities and Supply Chain

2020

Whistleblower policy

2021

Australia

Modern Slavery Policy

Second Group Modern

Slavery Statement

United Kingdom &

### **Effectiveness** continued

### Our journey and progress

We've been on our journey for several years and remain committed to continuous improvement in respecting human rights and managing modern slavery risk prevention. We know there is always more work to do.

In FY2026, our focus will be on further operationalizing and embedding our modern slavery policy and standard into day-to-day practice, while advancing the maturity of our risk management and due diligence processes to better

### First Group Modern Slavery Statement prevent and respond to human rights abuses. United Kingdom & Australia 2018 First Modern Slavery Statement United Kingdom (WorleyParsons) 2013 Established Ethics Helpline **Human Rights Policy** Supply Chain Code of Conduct 2019 Second Modern Slavery Statement United Kingdom Joined Building Responsibly 2017 Adopted United

Nations Sustainable

**Development Goals** 

#### 2022

Established Modern Slavery Working Group

Third Group Modern Slavery Statement United Kingdom & Australia: Received an 'A' rating from Monash University

#### 2024

Fifth Group Modern Slavery Statement United Kingdom, Australia & Canada

Joined the UN Global Compact Modern Slavery Community of Practice

### 2025

Sixth Group Modern Slavery Statement United Kingdom, Australia and Canada

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#### 2023

Fourth Group Modern Slavery Statement United Kingdom & Australia

First Canada Modern Slavery Report

Established Executive Human Rights and Diversity, Equity & Inclusion Committee

Participated in the UN Accelerator program on Business and Human Rights

Fourth Group Modern Slavery Statement United Kingdom: Received an 'A' rating from Monash University

Note: Years represent our financial year.

Joined UN Global Compact

2012

# **Appendices**

### **Appendix 1**

### **Reporting entities**

Under the Australian Modern Slavery Act 2018 (Cth), entities based or operating in Australia with an annual consolidated revenue exceeding \$100 million.

Under the United Kingdom Modern Slavery Act 2015 entities based or operating in the UK with an annual turnover of £36 million.

Under the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 defines an entity as a corporation or a trust, partnership or other unincorporated organization that either:

- a. is listed on a stock exchange in Canada; or
- b. has a place of business in Canada, does business in Canada or has assets in Canada and that, based on its consolidated financial statements, meets at least two of the following conditions for at least one of its two most recent financial years:
  - i. it has at least \$20 million in assets,
  - ii. it has generated at least \$40 million in revenue, and
  - iii. it employs an average of at least 250 employees.

Legal name	Structure	Business number	Location
Worley Limited	Public Company	ACN 096 090 158	Australia
Worley Services Pty Ltd	Private Company	ACN 001 279 812	Australia
Worley Power Services Pty Ltd	Private Company	ACN 112 723 181	Australia
Worley Engineering Pty Limited	Private Company	ACN 008 876 284	Australia
Worley Financial Services Pty Limited	Private Company	ACN 099 425 831	Australia
Worley Consulting Pty Ltd	Private Company	ACN 098 008 818	Australia
Worley EA Holdings Pty Ltd	Private Company	ACN 111 237 462	Australia
Worley Europe Limited	Private Company	04334425	UK
Worley Services UK Limited	Private Company	04334425	UK
Worley Canada Services Ltd.	Corporation	121393789	Alberta, Canada
Worley Fabricators Ltd.	Corporation	732250741	Alberta, Canada
WorleyCord Energy Solutions Ltd.	Corporation	858071442	Alberta, Canada
WorleyCord LP	Partnership	763631884	Alberta, Canada
WorleyCord TeamCo Ltd.	Corporation	121396741	Alberta, Canada
Chemetics Inc.	Corporation	896981-7	British Columbia, Canada

Appendices continued

### **Appendix 2**

### Reporting entities activities

Details of our reporting entities activities.

Legal entity name	Legislation <sup>5</sup>	Engineering services	Professional consulting services	Equipment fabrication	Construction management	Skilled labor	Import into Canada¹	Production and distribution <sup>2</sup>
Worley Limited <sup>3</sup>	Australia	<b>⊘</b>	<b>⊘</b>	<b>⊘</b>	<b>Ø</b>	<b>⊘</b>	-	-
Worley Services Pty Ltd	Australia	<b>⊘</b>	<b>⊘</b>		<b>⊘</b>		-	-
Worley Power Services Pty Ltd	Australia			<b>Ø</b>	<b>⊘</b>	<b>Ø</b>	-	-
Worley Engineering Pty Limited	Australia	<b>⊘</b>	<b>Ø</b>		<b>⊘</b>		-	-
Worley Financial Services Pty Limited <sup>4</sup>	Australia						-	-
Worley Consulting Pty Ltd	Australia		<b>Ø</b>		<b>②</b>		-	_
Worley EA Holdings Pty Ltd	Australia							
Worley Europe Limited	United Kingdom	<b>Ø</b>	<b>Ø</b>		<b>⊘</b>		-	-
Worley Services UK Limited	United Kingdom	<b>⊘</b>	<b>Ø</b>		<b>⊘</b>		-	-
Worley Canada Services Ltd.	Canada	<b>⊘</b>	<b>⊘</b>				I	
Worley Fabricators Ltd.	Canada			<b>⊘</b>		<b>⊘</b>	I	P S D
WorleyCord Energy Solutions Ltd.	Canada					<b>⊘</b>		
WorleyCord LP	Canada				<b>⊘</b>		I	S
WorleyCord TeamCo Ltd.	Canada					<b>⊘</b>		
Chemetics Inc.	Canada	<b>Ø</b>	<b>Ø</b>	<b>Ø</b>		<b>Ø</b>	I	PSDM

I = Import | P = Produce | S = Sell | D = Distribute | M = Manufacturer

<sup>1.</sup> Includes importing materials and equipment produced outside Canada.

<sup>2.</sup> Includes producing, manufacturing, selling or distributing fabricated equipment in Canada or outside Canada.

<sup>3.</sup> Worley Limited is the group parent company.

<sup>4.</sup> Internal corporate services entity.

<sup>5.</sup> Applicable legislation: Australia Modern Slavery Act 2018 (Cth); United Kingdom (UK) Modern Slavery Act 2015; Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023

### **Appendix 3**

### **Summary of reporting requirements**

Australia statement requirements	United Kingdom statement requirements	Canada report requirements	Where in this document	
Identify the reporting entities		Entity information	Appendix 1: Reporting entities	
Describe the reporting entity's structure, operations,	Describe the organization's structure, business, and supply chains	Describe company's structure, activities and supply chains	Structure, activities and supply chain	
and supply chains			Appendix 2: Reporting entities activities	
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Describe the parts of the business and supply chains where there is a risk of slavery and human trafficking taking place	Describe parts of the business and supply chains that carry a risk of forced labor or child labor being used and steps it has taken to assess and manage that risk	Due diligence: Modern slavery risks	
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Describe steps taken to assess and manage risks of slavery and human trafficking	Describe the steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labor or child labor is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity	Human rights due diligence	
	Describe the organizations policies in relation to slavery and human trafficking	Describe policies and due diligence processes in relation to forced labor and child labor		
	Describe the due diligence processes in relation to slavery and human trafficking in its business and supply chains			
	Describe the training and capacity building about slavery and human trafficking available to staff	Describe training provided to employees on forced labor and child labor	Our approach and actions: Training and awareness	
	Describe all the steps taken to address and remedy modern slavery	Describe measures taken to remediate any forced labor or child labor	Due diligence: Grievance and remediation	
		Describe measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labor or child labor in its activities and supply chains	_	
Describe how reporting entity assesses effectiveness of these actions	Describe effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such appropriate performance indicators	Describe how the entity assesses effectiveness in ensuring that forced labor and child labor are not being used in its business and supply	Effectiveness	
	Describe effectiveness of steps taken to address and remedy modern slavery			
Describe process consultation with any entities reporting entity			About this report	
owns/controls (not just statement must also describe consultation with giving statement)			Governance	

