

Our commitment  
to delivering a more  
**sustainable** world,  
free from human  
rights abuses

# Introduction

## ABOUT MODERN SLAVERY

Modern slavery is a general term to describe situations of exploitation and a range of practices including but not limited to human trafficking, forced labor, child labor, debt bondage, deceptive recruitment, and domestic servitude. This statement describes our modern slavery prevention program for the Worley group of companies during the financial period 01 July 2023 to 30 June 2024 (FY2024).

This is our fifth Modern Slavery Statement under the Australian *Modern Slavery Act 2018 (Cth)*, and the United Kingdom (UK) *Modern Slavery Act 2015*.

This year, our statement includes our commitments and contributions to comply with the Canada *Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023*.

## ABOUT THIS REPORT

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* - will report under Worley Limited in this joint statement. We've provided further detail on Worley Group entities covered by this statement in Appendix 1.

Our Norway business, Worley Rosenberg, has additional reporting requirements under the Norwegian *Transparency Act 2022*, which are met in a separate report and not included in this statement.

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 do not happen without commitment and support from across our business. This year's statement and program of initiatives have been led by our Sustainability Performance and Compliance teams with input from other functions within the business including Company Secretary, Enterprise Risk, Health & Safety, Internal Audit, Legal, People (human resources), Project Delivery, Quality and Supply Chain Management. We deliver this statement via a controlled program of reviews including reviews by senior leadership in parallel with approval by our CEO and Board.



## ACKNOWLEDGEMENT OF COUNTRY

Worley acknowledges and pays respect to the past, present and future Traditional Custodians of Country throughout Australia and extends 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 this 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

Worley acknowledges that the lands on which 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 will continue to respect 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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# CEO Message



We're driven by our purpose: delivering a more sustainable world. Our ambition is that we will be recognized as a global leader in sustainability solutions. We know that respecting, protecting, and promoting human rights is fundamental to sustainable outcomes, especially for our people, those we partner with and the communities in which we operate.



We've had long standing commitments to human rights and the welfare of people through partnerships such as the United Nations Global Compact (UNGC) and Building Responsibly. Our approach to delivering on these principles is to uphold the highest standards of business conduct ensuring people are treated with dignity, respect and fairness.



Operating as a global business in over forty countries presents both challenges and opportunities to manage and prevent modern slavery. We are committed to taking action to prevent modern slavery across all our locations. In FY2024, guided by our Human Rights in Practice Framework, we made positive progress across several key areas.

We updated our human rights and modern slavery policies, further aligning them with our commitment to UNGC and Building Responsibly Worker Welfare principles.

We reinforced our workplace culture by listening to our people's experiences, promoting a psychologically safe environment, and investing in building awareness and capability around modern slavery.

We have strengthened our focus on assessing and managing risks across our operations and supply chain. We also initiated a pilot for our OneSource digital sourcing platform, enhancing the visibility into our supply chain.

We were recognized for the improved disclosure quality of our FY2022 Modern Slavery Statement, receiving an 'A' rating by Monash University and have joined the UNGC Modern Slavery Community of Practice.

We have an unwavering commitment to the continuous improvement of our modern slavery prevention program. We will continue to monitor and be guided by best practices and aligned with regulatory developments globally. We acknowledge that we operate in some high risk jurisdictions, which increases our exposure to modern slavery risks. We have had no confirmed findings of modern slavery within our business in FY2024 however, we acknowledge the growing prevalence of this issue and remain vigilant in our approach.

I am encouraged by our progress and am pleased to present our fifth global Modern Slavery Statement, detailing our actions and ongoing journey.

Signed by:  
  
C9E31A115FEF4B2...

**Chris Ashton**  
Chief Executive Officer Worley Limited

November 2024

*In accordance with the requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the statement for 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 FY2024 reporting year.*

# Purpose, Ambition and Values

## Purpose

Delivering a more sustainable world.

## Ambition

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

## Values



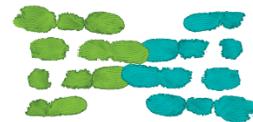
### WE VALUE LIFE

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



### WE RISE TO THE CHALLENGE

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



### WE ARE STRONGER TOGETHER

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



### WE UNLOCK BRILLIANCE

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

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

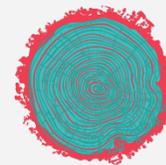


### Our people

We energize and empower our people to drive sustainable impact

#### OBJECTIVES

- We foster a safe, inclusive and innovative work environment that inspires our people.
- We provide outstanding opportunities to learn, develop and drive sustainability.
- We attract and retain top talent with diverse backgrounds.



### Our portfolio

We are our customers' most trusted partner

#### OBJECTIVES

- We will continue to make progress, subject to market conditions, in delivery of our aspiration to derive 75% of our aggregated revenue from sustainability-related work by FY2026.
- We will implement new solution-based models, enabled by data, technology and automation.
- We will expand the value we bring to our customers, share in that value and ensure a higher return on investment.



### Our planet

We partner with customers as stewards of a more sustainable world

#### OBJECTIVES

- We are committed to our own sustainability – reaching net zero Scope 1 and Scope 2 emissions by 2030<sup>1</sup>, net zero Scope 3 by 2050.
- We partner with customers committed to driving sustainability; together we decarbonize value chains and steward resources.
- We are recognized globally for our leadership in sustainability.

1. We have an interim target of 65% reduction in net Scope 1 and Scope 2 emissions by FY2025 from a FY2020 baseline.

# 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



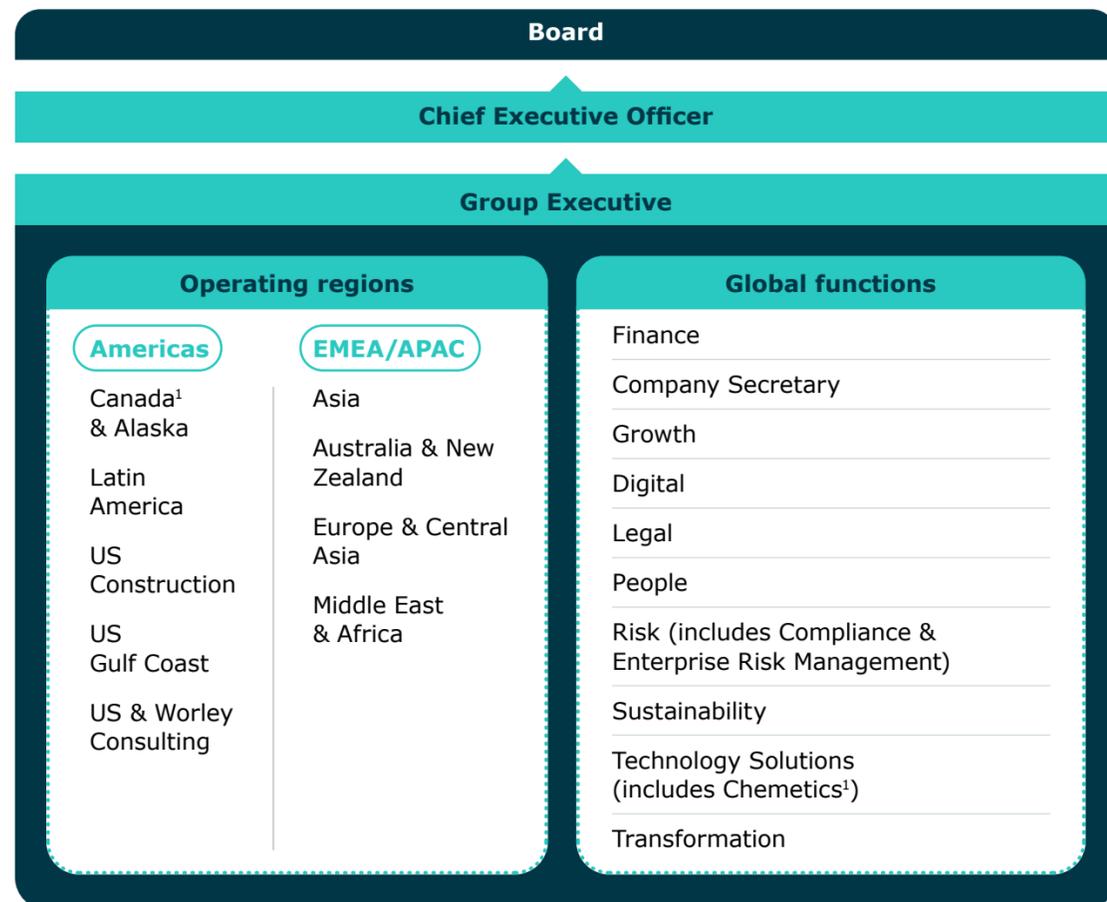
### CORE BRANDS



## Structure, Activities and Supply Chain continued

### 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 are 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.



**81.6%**  
are direct employees

**18.4%**  
are contract staff

**3,921**  
Total number of  
people in Australia

**4,795**  
Total number of  
people in Canada

**7,102**  
Total number of  
people in India

**2,761**  
Total number of  
people in UK

**6,991**  
Total number of  
people in United States

Worley's workforce is made up of professional services employees, 85%, with some of them in our major operating centres around the world, and a significant number of them, deployed on projects around the world. Our craft workforce represent about 15% of our overall workforce, and are deployed on project sites around the globe.

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

# Structure, Activities and Supply Chain continued

## Our activities

We're a professional services company of energy, chemicals and resources experts helping our customers shift their operations towards a more sustainable future.

We're partnering with our customers to deliver infrastructure and integrated solutions to some of the most ambitious, innovative and large scale projects in the world.

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

## OUR SECTORS

### ENERGY

Producing energy from lower carbon energy sources (e.g gas, wind, solar, blue and green hydrogen) and conventional sources (e.g oil and gas). We also undertake projects relating to power generation, transmission and distribution.

### CHEMICALS

Manufacturing, processing and refining chemicals and fuels, such as low-carbon fuels, petrochemicals, polymers and specialty chemicals.

### RESOURCES

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

## MARKETS WE SERVE

### Mature

#### Energy



Oil



Integrated gas



Combustion energy



Midstream energy infrastructure

#### Chemicals



Petrochemicals



Chemicals



Refined fuels



Specialty chemicals



Sulphur recovery and re-use

#### Resources



Bulk commodities



Fertilizers



Resource infrastructure



Precious metals

### Developing

#### Energy



Low-carbon hydrogen



Renewable energy



Networks and energy storage



Nuclear SMR



Power to X

#### Chemicals



Low-carbon fuels



Direct Air Capture



Ammonia / Methanol



Plastics recovery



Carbon capture (Cross sector capability)

#### Resources



Energy transition materials



Battery materials



Water

Key growth markets

# Structure, Activities and Supply Chain continued

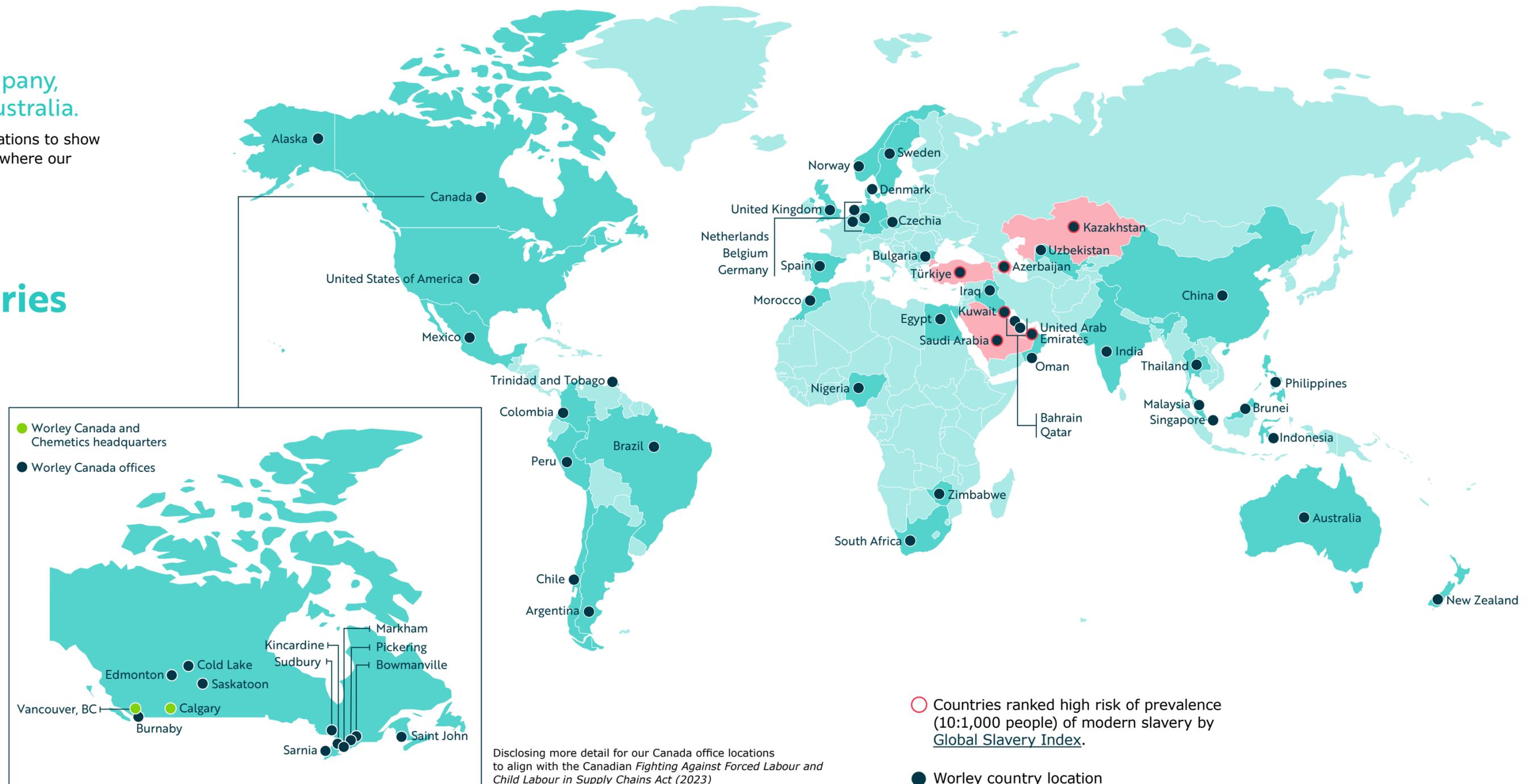
## Our locations

We are a global company, headquartered in Australia.

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



**45**  
countries



## Structure, Activities and Supply Chain continued

### Our supply chain

#### OUR SUPPLY CHAIN TEAM

We have 1,500+ supply chain professionals supporting a complex supply chain of 4,076 direct suppliers across 35 countries, facilitating corporate procurement and project procurement.

#### OUR SUPPLY CHAIN ACTIVITIES

Our supply chain team partners with customers both locally and globally. We manage the procurement of day-to-day materials, long-term assets, and complex services, including logistics, contracting, and modular construction projects.

We source materials and equipment from local and international suppliers, importing them worldwide. We also fabricate and manufacture equipment and modules which are then sold both domestically and internationally.

#### OUR SUPPLY CHAIN CAPABILITIES

We offer full service supply chain management capabilities including:

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

#### OUR SUPPLY CHAIN GOVERNANCE

We have a [Supply Chain Code of Conduct](#) and strive to implement socially responsible supply chain and anti-corruption practices. We do this by 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 FY2024, we commenced our OneSource pilot program, to consolidate all our suppliers - across both corporate and project procurement - into one procurement system. This will provide greater visibility of our supply chain in the coming years.

#### CASE STUDY

##### OUR ONESOURCE PILOT PROGRAM

At the end of FY2024, we commenced the pilot phase of our OneSource Program. This program is designed to provide deeper insights into our supplier base, their capabilities, and associated risks. Leveraging the latest technology our OneSource Program aims to enhance governance over our suppliers and contractors, particularly focusing on risks related to Modern Slavery.

To be completed in FY2025, the pilot employs standardized risk assessments, external databases, and advanced analytics to categorize and rank our suppliers by risk level, highlighting potential exposures. The increased visibility provided by these technological tools will enable a systematic approach to mitigating risks associated with Modern Slavery.

Following the completion of the pilot, we expect to expand the OneSource Program across our different regions.



## Structure, Activities and Supply Chain continued

### OUR SUPPLY CHAIN SPEND

For the purposes of this report, 'supply chain' refers to our direct procurement activities of goods and services. For the financial reporting period (FY2024) our global total spend was \$10.7b AUD across 4,076 suppliers. 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 increase in our spending and the number of suppliers was due to increased project activity and procurement on behalf of our customers. Our Canada operations spend was \$388.5m CAD. We imported \$18m CAD of material and equipment from 20 countries.

We utilize the United Nations Standard Products and Procurement Code (UNSPC) to guide the categorization of our spend. In FY2024, spend greater than 10% included mechanical equipment 23%, site services 16%, electrical equipment 16%, and engineering and construction 14%. 87% of our spend is from 10 countries including Australia, Canada, China, India, Mexico, Netherlands, Saudi Arabia, South Korea, the United Kingdom and the United States.

### OUR SPEND

**10.7 Billion**

Procurement spend<sup>1</sup>

**65% Spend**

With top 100 suppliers

**4,076**

Direct (Tier 1) suppliers

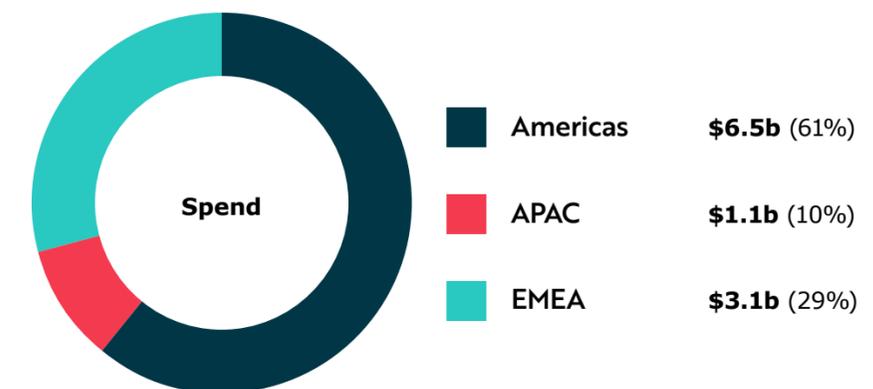
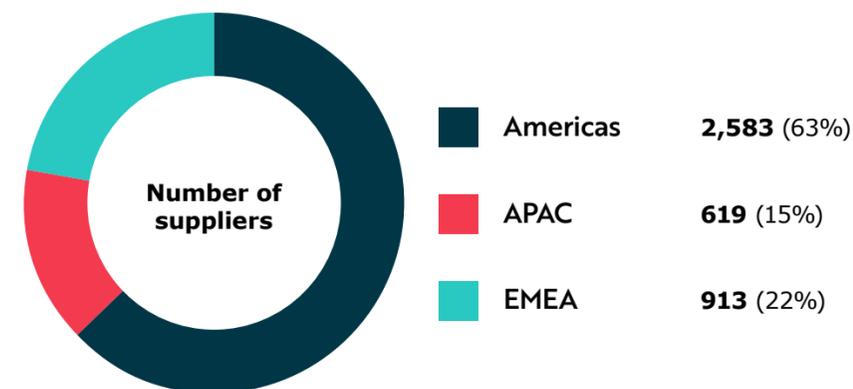
#### PROJECT PROCUREMENT 93%



#### CORPORATE PROCUREMENT 7%



### REGIONAL SPEND



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

## Structure, Activities and Supply Chain continued

Worley utilizes 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 FY2024, we have classified 80% of our top sourcing categories.

### TOP SOURCING CATEGORY SNAPSHOT

This represents 80% of procurement spend that has been classified using the UNSPC taxonomy.

Category		Percentage of procurement spend
Mechanical equipment	Conditioning systems, including equipment and components, fluid and solid waste management and treatment, heating, ventilation and air circulation equipment, industrial pumps and compressors and, power generation and distribution machinery and accessories	23%
Site services	Professional engineering services and project execution services including commissioning and startup services	16%
Electrical equipment	Electrical equipment and components including electrical regulators, boxes and enclosures, electrical cables and accessories	16%
Engineering and construction	Building construction services, finishing materials, construction equipment and tools, heavy construction services and specialized trade construction and maintenance services	14%
Piping and fabricated assemblies	Pipe assemblies, pipe and fitting and tube fittings	6%
Banking and investment	Financial services	5%
Human resource services	Management, business professionals and administration services and talent acquisition	5%
Manufacturing components and supplies	Hardware including fasteners, fixings and gaskets and operating materials including spare parts	4%
Distribution and conditioning systems and equipment and components	Fluid gas distribution including valves	3%
Facilities	Facility management, maintenance and repair services	2%
Professional services	Management advisory services	1%
Miscellaneous	Instrumentation, business services, oil and gas operating and production equipment, HSE equipment, tax expenses, IT equipment, fleet and renewables including solar energy	5%

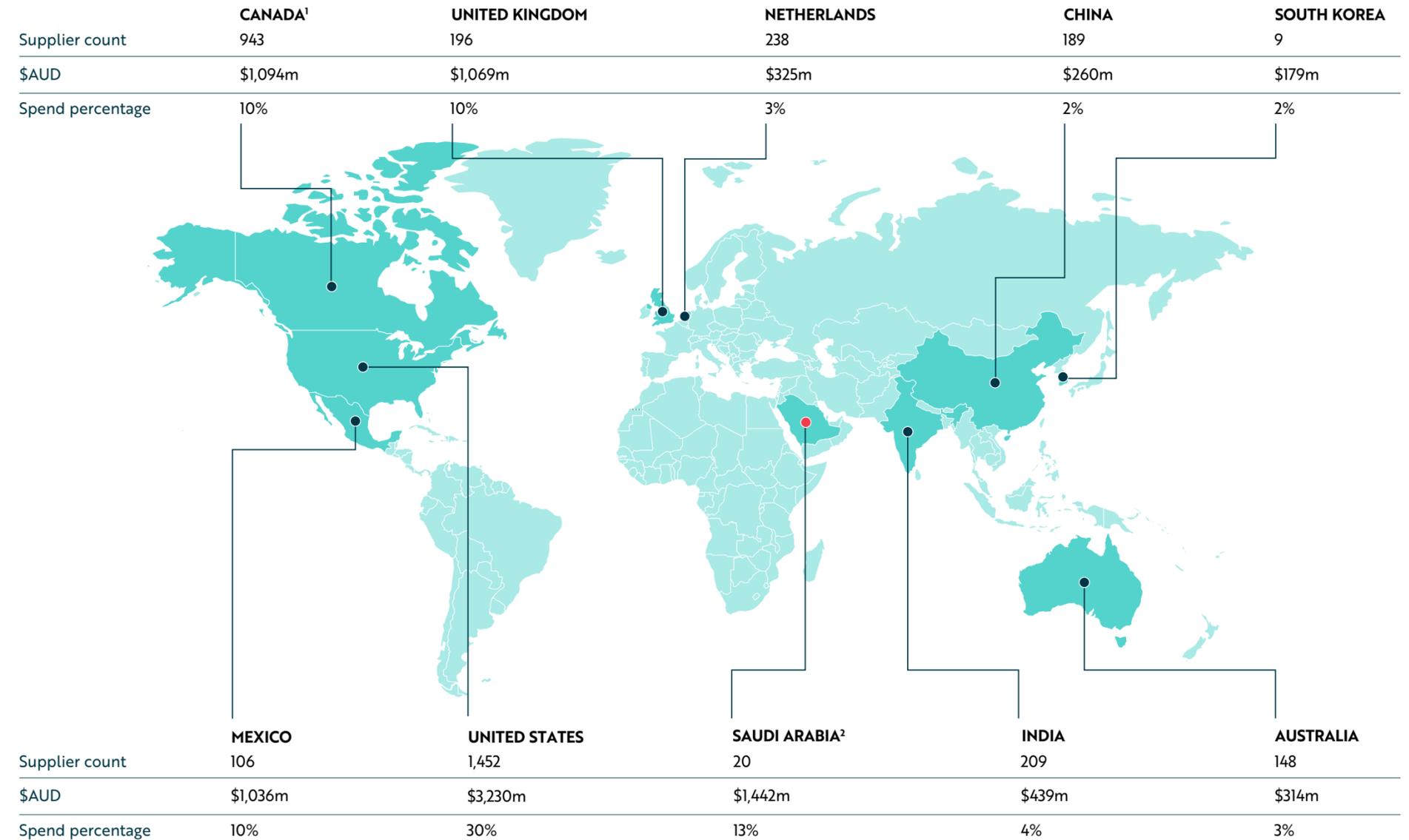


## Structure, Activities and Supply Chain continued

### TOP SOURCING SNAPSHOT BY COUNTRY

We have 4,076 Tier 1 suppliers in 53 countries. These top 10 countries account for more than 87% of our spend.

Supplier country	Top category
<b>Australia</b>	<ul style="list-style-type: none"> <li>Human resource services</li> <li>Professional services</li> <li>Banking and investment</li> </ul>
<b>Canada</b>	<ul style="list-style-type: none"> <li>Electrical equipment</li> <li>Piping and fabricated assemblies</li> <li>Mechanical equipment</li> </ul>
<b>China</b>	<ul style="list-style-type: none"> <li>Human resource services</li> <li>Instrumentation</li> <li>Electrical equipment</li> </ul>
<b>India</b>	<ul style="list-style-type: none"> <li>Banking and investment</li> <li>Financial and insurance services</li> <li>Piping and fabricated assemblies</li> </ul>
<b>Mexico</b>	<ul style="list-style-type: none"> <li>Engineering and construction</li> <li>Facilities</li> <li>Electrical equipment</li> </ul>
<b>Netherlands</b>	<ul style="list-style-type: none"> <li>Human resource services</li> <li>Mechanical equipment</li> <li>Facilities</li> </ul>
<b>Saudi Arabia</b>	<ul style="list-style-type: none"> <li>Mechanical equipment</li> <li>Site services</li> <li>Electrical equipment</li> </ul>
<b>South Korea</b>	<ul style="list-style-type: none"> <li>Piping and fabricated assemblies</li> <li>Mechanical equipment</li> </ul>
<b>United Kingdom</b>	<ul style="list-style-type: none"> <li>Site services</li> <li>Human resource services</li> <li>HSE equipment</li> </ul>
<b>United States</b>	<ul style="list-style-type: none"> <li>Electrical equipment</li> <li>Mechanical equipment</li> <li>Engineering and construction</li> </ul>



● Countries ranked high risk of prevalence (10:1,000 people) of modern slavery by [Global Slavery Index](#). For more information on risk in our supply chain refer to page 24.

- The types of materials and equipment we have imported into Canada include: Piping materials (valves, fittings, gaskets), Process equipment (vessels, regulators, meters, instruments), Electrical equipment (motors, cable), IT equipment, Chemicals, and Steel.
- Saudi Arabia spend is related to a single purchase of gas turbines from a global supplier.

# 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.

### COMMIT

Organizational commitment to respecting, protecting and promoting human rights

### IMPROVE

Continuous evolution of best practice

### REPORT

Transparent communication on progress



### ASSESS

Risks to people and opportunities to improve conditions

### ACT

Integrate proactive prevention and remedial action

### MONITOR

Measure and track effectiveness

We have completed the UN Global Compact Business & Human Rights Accelerator program. This year we also accepted the invitation to join the UN Global Compact Modern Slavery Community of Practice.



# Approach and Actions continued

## Our actions

Our FY2024 actions and deliverables demonstrate our framework in practice.



### COMMIT

**Our commitment to respecting, protecting, and promoting human rights.**

- Updated our Human Rights and Modern Slavery policies.
- Reviewed the effectiveness and representation of our Modern Slavery Working Group.



### ASSESS

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

- Held our annual risk and control effectiveness workshop to review risks.
- Completed high risk supplier assessments for contingent labor and electronics suppliers.
- Updated our geographical risk assessment to include customer project locations.
- Collaborated with Building Responsibly to develop a worker welfare project self-assessment tool.
- Completed internal audits in relation to payroll and modern slavery policy and procedures in some of our high risk geographies.



### ACT

**Our integrated approach to prevention and remediation.**

- Developed and deployed new modern slavery workshops and e-learning module.
- Designed and developed new human centered investigation training.
- Featured new human rights and modern slavery training as part of Global Thrive Week.
- Refreshed our Code of Conduct training to include an educational video on modern slavery.
- Enhanced our supply chain categorization and reporting.
- Translated our Ethics Helpline posters into 10 languages.



### MONITOR

**Measuring and tracking effectiveness.**

- Modern slavery observation card integrated into Supplier Quality Surveillance (SQS) business processes.
- Developed new Modern Slavery Scorecard to track program performance.



### REPORT

**Transparent reporting and communication on progress.**

- [Canada Modern Slavery \(2023\) Report.](#)
- [Norwegian Transparency Act \(2023/2024\) Statement.](#)
- [UN Global Compact Communication on Progress.](#)

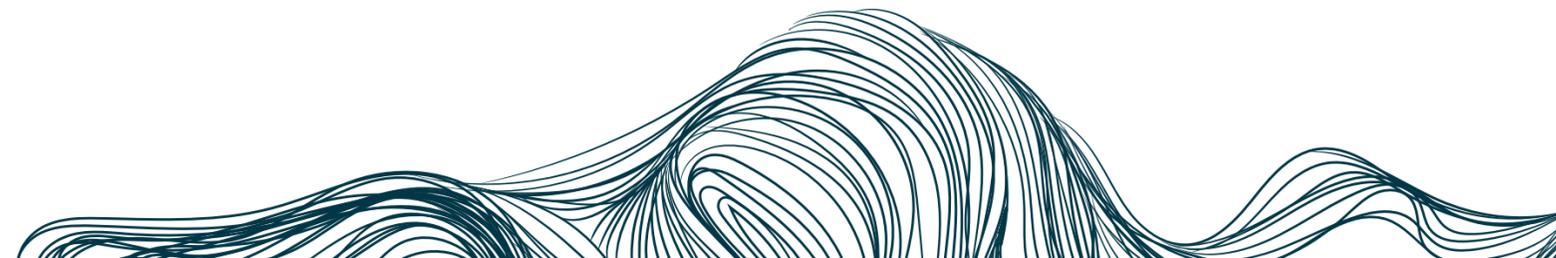


### IMPROVE

**Continuous evolution of best practice.**

- Received an 'A' rating from Monash University for the improvement in our FY22 Modern Slavery Statement.
- Accepted an invitation to participate in the UN Global Compact Modern Slavery Community of Practice.

Further details on these actions are outlined throughout this statement.



## Approach and Actions continued

### Our training and awareness raising

We continuously build our capability and improve our understanding of modern slavery to support our commitment to respecting human rights and to manage the risk of modern slavery across our operations proactively. We have dedicated human rights and modern slavery prevention program pages on our internal intranet site that provide our people with information and resources. We also use our news features and Viva Engage communication channels to further raise awareness.

In FY2024, we conducted sessions with our senior operational leadership teams to raise awareness of human rights, labor rights, worker welfare and the risks of modern slavery. The sessions included senior leaders from across our Americas, APAC and EMEA regions.

We also continued to focus on building capability through mandatory training such as our Code of Conduct, new e-learning modern slavery training modules and workshops for key functions.

#### GROUPWIDE TRAINING

##### CODE OF CONDUCT INDUCTION

Founded in our values, our Code of Conduct sets out the standard of professional behavior and guides our everyday decisions. New starters receive online Code of Conduct induction training upon joining Worley. This includes a dedicated section on modern slavery, the types of modern slavery, the steps that must be taken by our people to reduce risks, and how to appropriately report any concerns.

##### CODE OF CONDUCT REFRESHER

We provide an annual refresher module on our Code of Conduct to our people. This year, our refresher training included an educational video to raise awareness of modern slavery, specifically human trafficking, forced labor, bonded labor, child labor and deceptive recruitment, our areas of risk and how to report cases through our Ethics Helpline.

We provide a Toolbox version of the training for our field-based (craft workers) people who do not have access to our online systems. This year's Code of Conduct toolbox talk focused on indicators of modern slavery and how to report concerns via our confidential channels.

#### ROLE SPECIFIC TRAINING

##### ONLINE MODERN SLAVERY MODULE

In FY2024, we deployed an online learning module and made it available to our people via our e-learning platform. We also assigned the module to our Construction, HSE, People, Quality, R3, Sales and Supply Chain Management teams. The course defines modern slavery, the types of slavery and how modern slavery can occur in supply chains and operations as well as the indicators of exploitation.

##### MODERN SLAVERY WORKSHOP

In FY2024 we also designed and developed a one hour interactive online workshop for selected team members from Construction, HSE, People, Quality, R3, Sales and Supply Chain Management. Leaders identified team members who would benefit from additional in-depth training. The workshops were designed to be interactive based on relevant case studies. We tailored the training sessions to each audience, with specific learning points or actions for each group reflecting the situations they were most likely to encounter.

### CASE STUDY

#### OUR GLOBAL TRAINING WEEK FOCUSED ON LEARNING AND CAREER DEVELOPMENT

During FY2024, we launched our first global learning event called 'Thrive'. This was a companywide recognition of the importance of learning and developing new skills. The week provided our people with a wealth of learning pathways including opportunities to participate in masterclasses, live leader-led and panel discussions, and self-paced learning using our new e-learning platform.

During 'Thrive', we featured two self-paced learning modules on human rights and modern slavery. The human rights module introduced human rights, the United Nations Guiding Principles (UNGP) and the role of business in respecting human rights. The modern slavery module covered the types of modern slavery, prevalence, and indicators. Both modules emphasized the importance of conducting human rights due diligence to proactively prevent human rights abuses including modern slavery. A total of 246 people completed the online training. See additional training on page 16.



## Approach and Actions continued

### FY2024 training at a glance



#### ONLINE CODE OF CONDUCT INDUCTION

- Audience: Worley new starters\*
- Global No. of completions: 1,580<sup>1</sup>
- Source: Third-party provider
- Course length: approx. 25 mins
- Languages: 9 (including English)



#### MODERN SLAVERY WORKSHOPS

- Audience: Nominated by key functional leaders
- Source: Internal design
- Global No. of completions: 550<sup>4</sup>
- Workshop length: approx. 1 hour

1. No. of Online Code of Conduct Induction in Canada 157.  
 2. No. of Toolbox annual Code of Conduct refresher in Canada 653.  
 3. No. of Online annual Code of Conduct refresher in Canada 3,365.  
 4. No. of Modern slavery workshops in Canada 82.  
 5. No. of Online modern slavery training in Canada 470.  
 \* With access to online learning.



#### ANNUAL CODE OF CONDUCT REFRESHER

##### TOOLBOX TALK:

- Audience: Our people without access to online Learning Management System
- Global No. of completions: 2,480<sup>2</sup>
- Source: Internal design
- Toolbox topic length: approx. 5-10 mins
- Languages: Resources provided in English

##### ONLINE COURSE:

- Audience: Our people with access to online Learning Management System
- Global No. of completions: 42,800+<sup>3</sup>
- Source: Third-party provider
- Course length: approx. 15 mins
- Languages: 9 (including English)



#### ONLINE MODERN SLAVERY TRAINING

- Audience: Members of key functions
- Source: Third-party provider
- Global No. of completions: 3,961<sup>5</sup>
- Course length: approx. 30 mins





## Approach and Actions continued

### CASE STUDY

#### LISTENING TO OUR PEOPLE'S EXPERIENCE

In September 2023, we conducted a listening survey across our global people population known internally as 'Be Heard!'. This survey was a further step in exploring ways to gather regular and timely feedback from people on their experiences, and to identify areas for improvement.

We received a 67% response rate to the survey, which asked a range of questions across categories such as people experience (people pillar of our ambition), culture (critical few behaviors), and employer brand (pride in working at Worley). We also focused on psychological safety to ensure people feel they can voice ideas and opinions, and are comfortable to challenge and take social risks.

We have seen positive results in these in these areas and are looking to further connect these results to other data points to identify potential areas of modern slavery risks.



## Our engagement and consultation

### INTERNAL CONSULTATION, SUPPLIERS AND BUSINESS PARTNERS

We have clear expectations that our people, suppliers and business partners will speak up about breaches of our Code of Conduct via our Ethics Helpline, which allows multi-language, 24 hour, seven days a week reporting of ethical concerns. For more details on our helpline, visit our grievance and remediation section page 28.

All policies and procedures are accessible to our people via our intranet-based management system. We encourage our people to submit improvement suggestions via our knowledge and management systems. We also communicate new policies and procedures, and updates to existing policies, on our intranet and in a quarterly summary to key stakeholders. Regular updates ensure continuous improvement of our knowledge and management systems.

### EXTERNAL PARTNERS

We have specific policies to regulate joint ventures and screen potential joint venture partners. These require that our partners meet or exceed the minimum expectations of our policies including our Code of Conduct.

We perform ethical due diligence on our business partners. See our due diligence section page 27 for more information.

### PARTNERING WITH INDUSTRY GROUPS

We recognize the importance of collaboration when tackling modern slavery. We have two active partnerships that support us in relation to human rights and modern slavery, the United Nations (UN) Global Compact and Building Responsibly.



We are a signatory to the UN Global Compact (UNGC) framework for companies. This is based on 10 universally accepted principles in the areas of human rights, labor standards, environment, and anti-corruption.

The purpose of the UNGC is to encourage the implementation of the UN's Sustainable Development Goals and drive change across multiple sectors and geographies. Each year, we produce a [Communication on Progress \(COP\) report](#) which publicly reports on our commitment to sustainability.

As part of our commitment, we participated in the UNGC Business & Human Rights Accelerator program.

In FY2024, we accepted an invitation to join the UN Global Compact Modern Slavery Community of Practice.



We are an active board member of Building Responsibly, a group of engineering and construction companies launched in 2017 focused on the welfare of workers. The group created 10 Worker Welfare Principles and is committed to promoting and improving the rights and welfare of workers by creating tools and resources for companies working in the construction sector.

In FY2024, in collaboration with Building Responsibly, we developed a Project Self-Assessment Tool. Project teams can use this to measure performance with the 10 Worker Welfare Principles.

### CASE STUDY

#### FURTHER ALIGNING OUR POLICIES WITH OUR COMMITMENTS

In FY2024, we reviewed and updated our Human Rights and Modern Slavery policies to further align them with our commitments to the United Nations Global Compact principles on human rights and labor rights and Building Responsibly 10 Worker Welfare Principles.

We did this by conducting a gap analysis of our existing policies with the principles, undertaking cross-functional reviews, and seeking endorsement from our Executive Human Rights and Diversity, Equity & Inclusion Committee.

# Governance

## Our governance

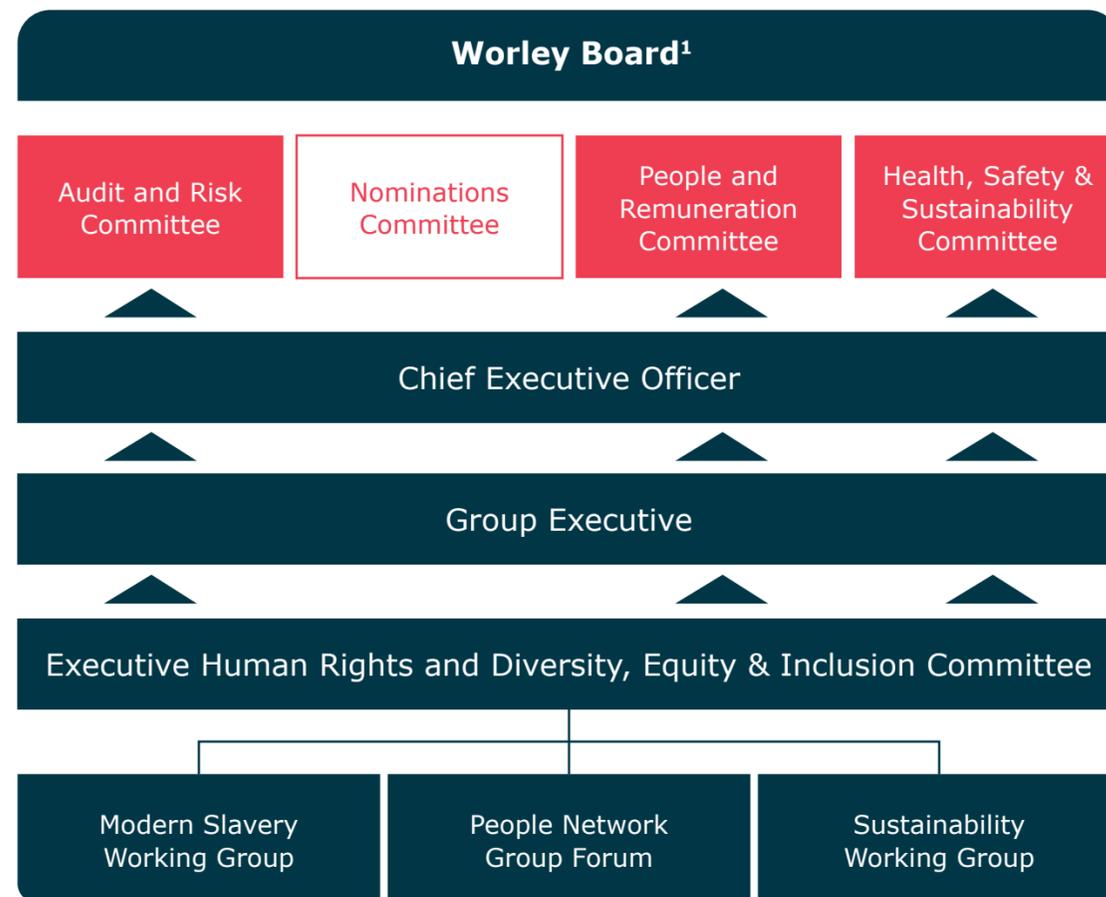
Our Board has ultimate accountability to ensure we meet our applicable safety, performance, and governance standards. Our focus on human rights and response to modern slavery is governed at the Board level through the Audit and Risk Committee.

Our Board is supported by our Executive Human Rights and Diversity, Equity & Inclusion Committee, which provides strategic advice for human rights-related matters. The committee, jointly chaired by our Chief People Officer and Executive Group Director Sustainability, monitors the implementation of strategic objectives. The committee ensures alignment with international standards and regulatory requirements and drives effective risk management for people-related risks.

Our Modern Slavery Working Group (MSWG), jointly chaired by our Executive Group Director Sustainability and our Group General Counsel, comprises of representatives from Risk, Compliance, Legal, People, Project Delivery, Supply Chain and Sustainability. The MSWG meets every two months with the purpose 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 it's defined, measurable and reported on a consistent basis, is incorporated into strategies, and is reflected in both what we do and do not do as a business.

During FY2024, we enhanced the program management with the introduction of an agile scrum board and a Modern Slavery Scorecard to keep the MSWG informed of our progress. We conducted a review of the working group's effectiveness and representation. The MSWG met six times across multiple time zones. The working group also participated in the FY2024 assessment of our modern slavery risks and provided feedback on areas of risk, degree of involvement and the effectiveness of our controls.



1. The board of directors for Worley Limited.

## CASE STUDY

### TRACKING GLOBAL HOURS OF WORK AND OVERTIME

Excessive hours and overtime can impact a person's health, safety and wellbeing. If these hours are conducted under threat or penalty, it can be an indicator of forced labor.

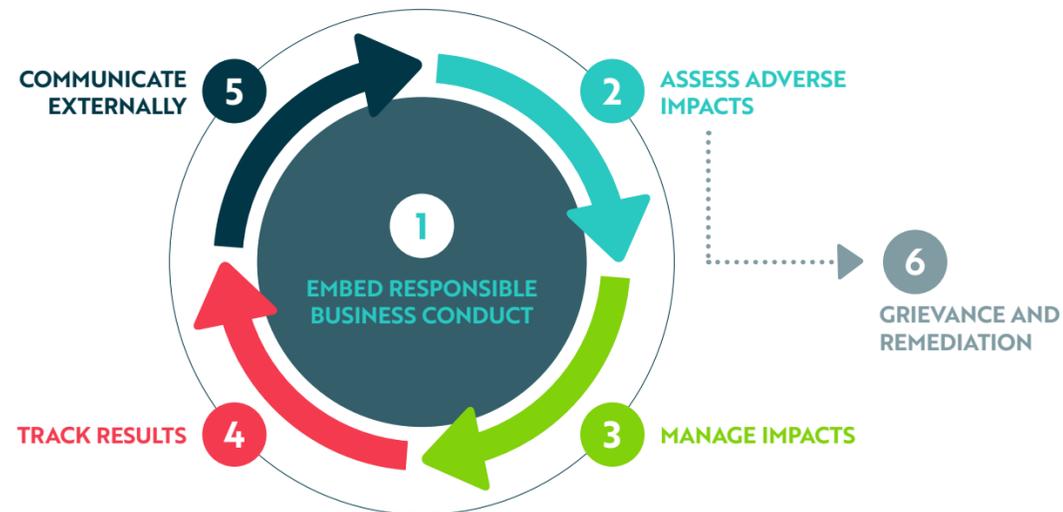
In FY2024, our Finance team developed a dashboard to provide oversight of our people's timecard entries. This will ensure accurate and appropriate hours are booked, and enable monitoring of overall hours of work. Regional and location leaders were provided training and resources to access the tool.



# Due Diligence

## Human Rights Due Diligence

We seek guidance from the United Nations Guiding Principles in our approach to conducting human rights due diligence via the following steps:



Source: [OECD Due Diligence Guidance for Responsible Business Conduct](#)

## Embed responsible conduct

1

### 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.

Other applicable policies set out our standards for professional behavior, ethical conduct and compliance with all laws and regulations. They include:

Our policies	What's included?
<b>Human Rights Policy</b>	Outlines our commitment to respecting the fundamental human rights of the people we deal with, and that we won't be complicit in activities that encourage human rights abuses.
<b>Modern Slavery Policy</b>	Outlines our commitment to the prevention of modern slavery and ensuring people are treated with dignity, respect and fairness.
<b>Safety, Health, and Wellbeing Policy</b>	Outlines our commitment and application of laws related to maintaining a physically and psychologically safe, healthy, and respectful environment.
<b>Diversity, Equity, and Inclusion Policy</b>	Outlines our commitment to a diverse, equitable and inclusive workplace where our people are treated with respect, feel included and can reach their full potential.
<b>Respectful Workplace Behavior Policy</b>	Outlines our commitment to creating a safe and respectful workplace where harmful and disrespectful behaviors are not tolerated.
<b>Sustainability Policy</b>	Outlines our commitment to support progress towards achieving the United Nations Sustainable Development Goals and upholding the principles of the UN Global Compact.
<b>Whistleblower Policy</b>	Outlines our commitment to ethical business practices and investigating and reporting any unethical conduct and provides assurance that a reporter will be protected against adverse actions.
<b>Anti-Bribery and Corruption Policy</b>	Outlines our commitment to honest and ethical conduct in compliance with applicable anti-bribery and corruption laws.
<b>Supply Chain Code of Conduct</b>	Outlines our ethical expectations of suppliers and contractors aligned with our Code of Conduct, policy and principle commitments.

All our policies are available to our employees via our intranet site, and are also publicly available on our [corporate governance website](#).

## Due Diligence continued

### Assess adverse impacts

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

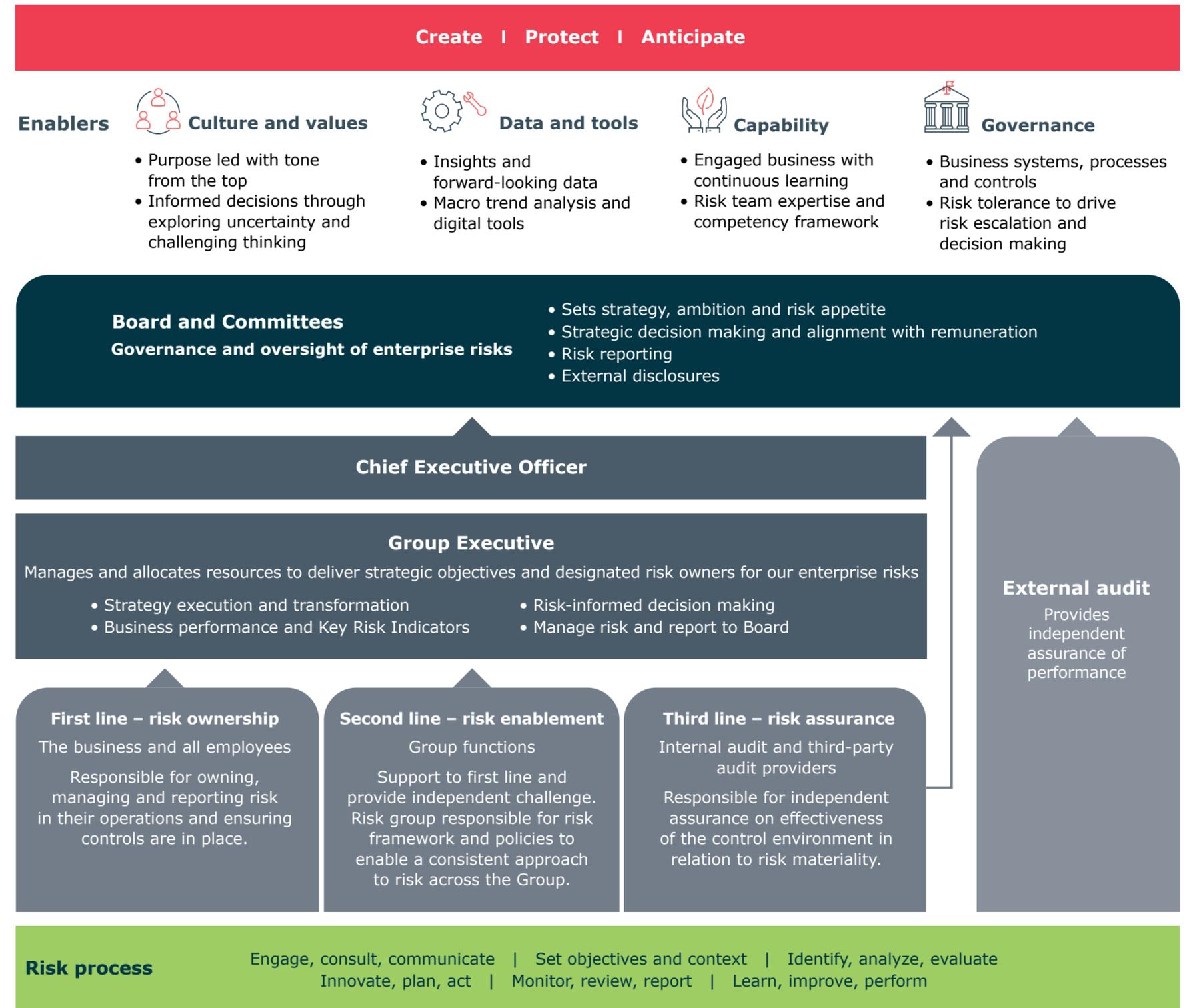
#### RISK MANAGEMENT AND INTERNAL CONTROLS FRAMEWORK

Our risk management and internal controls framework empowers our people to manage our 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 UN Guiding Principles on Business and Human Rights.

Our Sustainability and 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.

During FY2024, we have commenced building a risk exposure dashboard that leverages internal and external data, to provide greater visibility of specific risk exposures. This dashboard will assist to identify the greatest areas of inherent risk exposure and will help to inform and prioritize treatment actions.



## Due Diligence continued

### 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 within our operations, supply chain and stakeholder partnerships include:

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

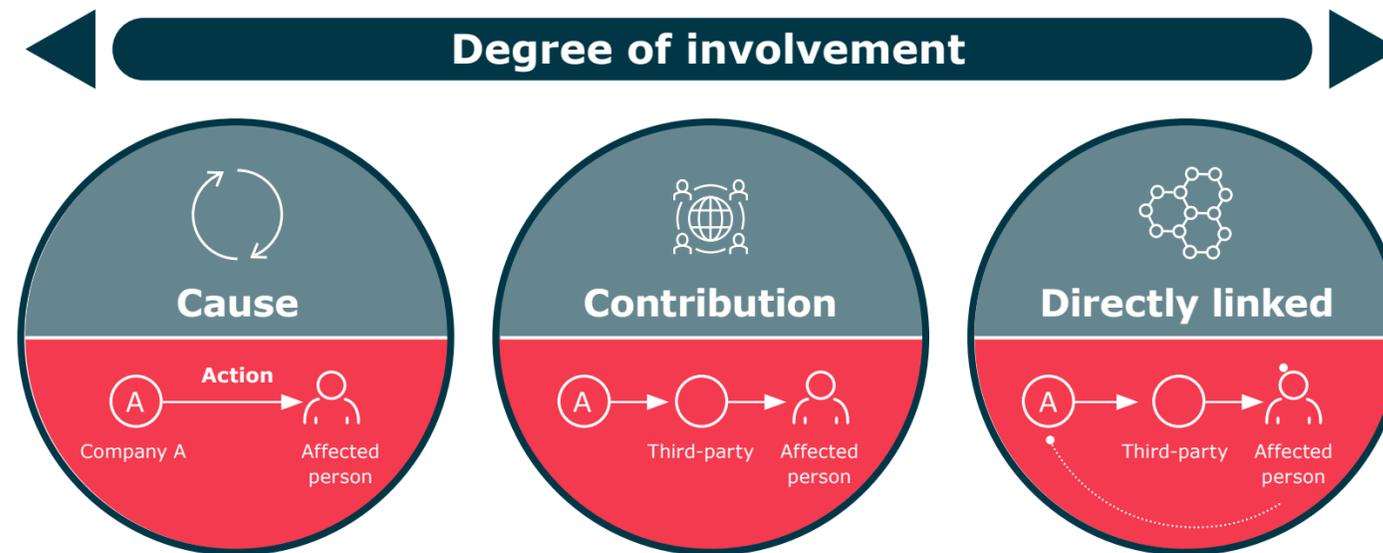
A key feature of our enterprise risk management system is the assessment and management of modern slavery risks. When assessing the level of risk to people, especially vulnerable groups, we consider a range of interconnected factors. These factors include sector, geography, scope of project, products and services, and the stakeholders and suppliers we partner with.

Our MSWG conducts a formal annual review of our salient modern slavery risks, risk treatments and control effectiveness. In FY2024, 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.

For example, companies can:

- **Cause** an adverse human rights impact, if operational activities directly use any forms of exploited labor
- **Contribute** to an adverse human rights impact, if companies demand goods and services within unrealistic timeframes resulting in a supplier breaching labor standards to deliver on time
- **Directly link** to an adverse human rights impact, through a third-party relationship where they are manufacturing products using child labor in their supply chain



We discuss the risk of involvement in modern slavery through the following lenses:





## Due Diligence continued

### RISKS IN OUR OPERATIONS

Our risk of modern slavery in operations is influenced by multiple interconnecting factors. These include the sectors we support, the nature of projects we undertake, the geographical locations we operate in, and how we engage people in our workforce.

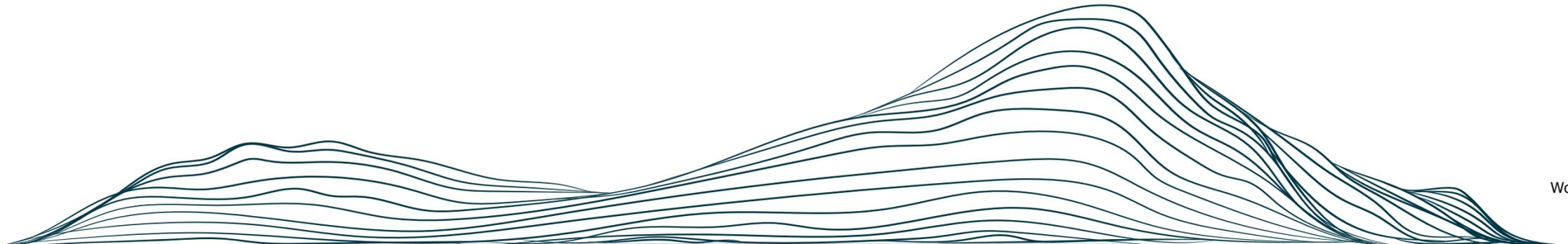
Risk area	Description	Risk of involvement	Control
Sector	<p>Some of the global sectors we operate in have a higher risk of modern slavery. This is due to the need to outsource labor and the supply chain risks related to procurement of raw materials. Examples include:</p> <p><b>Energy</b> The renewable energy industry carries risk of forced labor within the supply chain. This risk is related to sourcing of raw materials required for renewable energy technologies and projects, including solar and wind energy projects and electric vehicles.</p> <p><b>Chemicals</b> The chemicals sector carries some risk in the supply chain, particularly any raw materials required. Risk within the sector itself is relatively low due to the need for highly skilled workforce.</p> <p><b>Resources</b> The resources sector - including the markets of mining, minerals and infrastructure – carries a higher risk of modern slavery through both our operations and supply chain. This is because of high reliance on outsourced labor and risks of forced labor including child labor in the supply chain.</p>	Directly linked	<a href="#">Our governance</a> <a href="#">Our risk management framework</a> <a href="#">Our policies</a> <a href="#">Engagement and consultation</a> <a href="#">Due diligence</a> <a href="#">Grievance and remediation</a>
Geographic location	<p>Countries which are known to have higher risks of modern slavery and other human rights abuses often have a weaker rule of law. They are at risk of corruption, conflict, or political instability. This risk also relates to countries or regions that have a high prevalence of vulnerable people that may be compromised, displaced or subject to severe discrimination. We acknowledge that risks of modern slavery exist in every country and use the Global Slavery Index to understand our highest risk locations from both an operational and supply chain perspective. (Refer to <a href="#">our locations</a>)</p>	Directly linked	<a href="#">Our locations</a> <a href="#">Our governance</a> <a href="#">Our risk management framework</a> <a href="#">Our policies</a> <a href="#">Due diligence</a> <a href="#">Grievance and remediation</a>





## Due Diligence continued

Risk area	Description	Risk of involvement	Control
<p><b>Project scope</b></p>	<p>The phases of project lifecycle carry differing risks of modern slavery. Our project lifecycle includes the following phases: concept, feasibility, front end engineering design, detailed design, procurement, construction, commissioning, operations and decommissioning.</p> <p>Specific project stage risks include:</p> <ul style="list-style-type: none"> <li>• Engineering: The use of high value centers</li> <li>• Procurement: Supply chain risk can occur throughout the project lifecycle and can carry additional risk when we are required to use client directed suppliers. (Refer to <a href="#">risk in our supply chain</a>)</li> <li>• Construction: An increased risk of modern slavery due to demand for low-skilled labor. Labor can also be engaged through third-party recruitment agencies. (Refer below workforce engagement). The construction phase further interacts with higher risk products and services such as raw materials, which can have a higher risk of forced and child labor. (Refer to <a href="#">product and services</a>)</li> <li>• Operational risks particularly in operations that involve manufacturing, maintenance or logistics carry heightened risk.</li> </ul>	<p>Cause Contribute</p>	<p><a href="#">Our locations</a> <a href="#">Our governance</a> <a href="#">Our risk management framework</a> <a href="#">Due diligence</a> <a href="#">Grievance and remediation</a></p>
<p><b>Workforce engagement</b></p>	<p>Contingent, temporary work or engagements that use third-party agencies carry higher risk of modern slavery. This is due to use of vulnerable workers such as migrant workers. Risks of modern slavery include deceptive recruitment with risk of human trafficking, forced labor and debt bondage.</p>	<p>Contribute</p>	<p><a href="#">Our governance</a> <a href="#">Our risk management framework</a> <a href="#">Our policies</a> <a href="#">Training and awareness</a> <a href="#">Due diligence</a> <a href="#">Grievance and remediation</a></p>
<p><b>Operational accommodation and camp services</b></p>	<p>Engagement of migrant workforce in camp-style accommodation carries an increased risk of modern slavery. These scenarios can involve deceptive recruitment, bonded labor, forced labor including restriction of movement as well as poor accommodation and or working conditions.</p>	<p>Cause</p>	<p><a href="#">Our governance</a> <a href="#">Our risk management framework</a> <a href="#">Our policies</a> <a href="#">Training and awareness</a> <a href="#">Grievance and remediation</a></p>





## Due Diligence continued

### RISKS IN OUR SUPPLY CHAIN

Our supply chain risk of modern slavery is affected by the complexity of our supply chain, including the number of suppliers, suppliers beyond Tier 1, supplier locations and the projects and services we source or interact with.

Risk area	Description	Risk of involvement	Control
Supply chain complexity	A complex, multi-tier, global supply chain makes it challenging to have full visibility and control over all suppliers and sub-contractors. This creates a risk of contributing to forms of modern slavery in our supply chain and through suppliers we engage with.	Contribute	<a href="#">Our governance</a> <a href="#">Our risk management framework</a> <a href="#">Our policies</a> <a href="#">Due diligence</a>
Customer supply chain and systems	Our customers often request that we use their approved supplier list. This may increase our risk of modern slavery in our supply chain if we are not directly responsible for completing the due diligence checks.	Contribute	<a href="#">Our governance</a> <a href="#">Our risk management framework</a> <a href="#">Our policies</a> <a href="#">Due diligence</a>
Products and services	<p>Certain products and services carry inherent modern slavery risks, particularly if they are sourced or engaged from higher risk geographies.</p> <p><b>Electronics and IT equipment</b>                      Electrical devices such as computers, laptops, mobile phones as well as electrical equipment such as solar panels and batteries are recognized as high risk. This is due to the geographical location of manufacturing and use of raw materials.</p> <p><b>Industrial equipment and materials</b>                      Industrial equipment and material required for building and construction, electrical and/or processing equipment can be higher risk. This is due to the reliance on high risk raw materials such as bricks, concrete and steel, as well as risks of modern slavery in their manufacture and production.</p> <p><b>Office space, cleaning, catering, maintenance, and security services</b>                      Services engaged to clean, cater, maintain, or secure our offices and operational sites rely on sub-contracted arrangements with agencies or through our landlords. They may use low-skilled, seasonal or migrant workers who can be vulnerable and at heightened risk of modern slavery.</p> <p><b>Logistics and transport</b>                      Reliance on shipping, logistics and transportation of supplies and equipment carries risk of modern slavery including forced labor and human trafficking through deceptive recruitment.</p> <p><b>Garments and PPE equipment</b>                      Garments for safety and personal protective equipment manufactured in higher risk geographical locations and or that require raw materials such as rubber and cotton carry higher risk of forced labor including child labor.</p>	Contribute	<a href="#">Our governance</a> <a href="#">Our risk management framework</a> <a href="#">Our policies</a> <a href="#">Due diligence</a>



## Due Diligence continued

### RISKS WITH OUR STAKEHOLDERS

Our stakeholder risk of modern slavery is concerned with our role in business relationships with customers, joint ventures and community organizations we partner with.

Risk area	Description	Risk of involvement	Control
Customer-controlled operations	Scenarios where our customers control the project’s location and site standards may increase our risk of contributing to modern slavery risks in our operations.	Directly linked Contribute	<a href="#">Our governance</a> <a href="#">Our risk management framework</a> <a href="#">Our policies</a> <a href="#">Engagement and consultation</a> <a href="#">Due diligence</a>
Non-controlling joint venture partner	Some partnership arrangements where we are not the controlling entity, such as joint ventures, may increase our risk of contributing to modern slavery. This is because we are not in control of the systems and processes governing these projects.	Contribute	<a href="#">Our governance</a> <a href="#">Our risk management framework</a> <a href="#">Our policies</a> <a href="#">Engagement and consultation</a> <a href="#">Due diligence</a>
Country agent relationships	In some cases, there are legal requirements for us to work with a local partner to be able to operate in some countries. We could therefore be directly linked to modern slavery through our partner.	Directly linked	<a href="#">Our governance</a> <a href="#">Our risk management framework</a> <a href="#">Our policies</a> <a href="#">Engagement and consultation</a> <a href="#">Due diligence</a>
Charitable volunteering and donations	Modern slavery risks including child labor can exist in charitable donations, such as monetary funds and skilled volunteering. This poses a potential risk for the Worley Foundation <sup>1</sup> and country Corporate Social Responsibility (CSR) committees, which provide support to local community not-for-profit organizations.	Contribute	<a href="#">Our governance</a> <a href="#">Our risk management framework</a> <a href="#">Our policies</a> <a href="#">Engagement and consultation</a> <a href="#">Due diligence</a>

1. For further detail on the Worley Foundation refer to the Worley FY2024 Annual Report (Pg. 54)

## Due Diligence continued

### Manage impacts

**3 Step 3: Cease, prevent and mitigate adverse impacts.**

Due diligence plays an important role in preventing modern slavery in our supply chains and operations.

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

The level of due diligence depends on the type of relationship and risk level, among other factors. All aspects of our due diligence program are supported by our 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 due diligence team works in partnership with our Sales team to evaluate any 'red flags' that are 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 high risk geographies. This notification takes the user to online resources to help understand the modern slavery risks at the proposal stage, and how to contact our Compliance team for more details and advice on working with the customer.

#### SUPPLIER DUE DILIGENCE

We work with our Supply Chain team and relevant business teams to manage supplier due diligence requests. Requests can be made through various channels, including our supplier registration tool, or directly through the supply chain team. Once the assessment is complete, our Compliance team assists our supply chain management teams to identify and understand red flags (if any), and propose mitigations.

Our supplier registration tool enables us to communicate with our suppliers and provide general compliance guidance for suppliers who have confirmed that they do not have policies or training programs in place.

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, security and maintenance staff and modern slavery policy details.

Once we have engaged a supplier, we may perform site inspections to check quality standards. We have a modern slavery observation card that contains modern slavery indicators (based on the International Labour Organization's Forced Labor Indicators). Inspectors are engaged to use the observation card while carrying out their regular duties of technical inspection of goods and materials.

We've integrated this modern slavery observation card into our supplier quality surveillance business process. During FY2024, we included the use of the modern slavery observation card during the online workshop training for supply chain leaders. See our training and awareness raising section page 15 for more information.

#### CASE STUDY

##### ASSESSING HIGH RISK LABOR HIRE SUPPLIERS

In FY2024, we utilized the Building Responsibly supplier assessment questionnaire and tool to conduct a high risk supplier assessment for contingent labor hire agencies and electronic suppliers.

Fifteen labor hire agency suppliers operating in the United Arab Emirates, Kingdom of Saudi Arabia and China were selected with a total of \$22m AUD spend during the FY2024 financial year.

Suppliers were engaged via our Supply Chain and Talent Acquisition teams to complete a supplier questionnaire and provide supporting evidence of compliance with our Building Responsibly principles. We received a 100 percent response rate from our suppliers. Five suppliers were identified to have a level of risk that required further due diligence which we are currently undertaking. Any findings will be addressed in line with our policy commitments.



## Due Diligence continued

### PARTNER DUE DILIGENCE

We have internal due diligence procedures for other partners including agents, joint ventures and local sponsors. Our approach includes the completion of a questionnaire by our potential partner to understand their program. We take a risk-based approach to assess the level of due diligence needed for each partner.

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

After the initial internal due diligence is performed, we also seek the support of external service providers in certain cases where there may be 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 where we screen the board of trustees of charities and their senior management.

### Track results

#### **4** Step 4: Track implementation and results.

We extract, calculate and monitor the number of due diligence checks performed on third-parties, including customers, suppliers and other partners. This exercise is carried out on a periodic basis and helps track the number of checks performed by the Compliance team. Red flags that are discovered during the due diligence process are highlighted to appropriate senior personnel with suitable mitigation plans to be implemented and tracked by the applicable project teams.

Our Internal Audit team, through formal internal audits, monitors the effectiveness of our due diligence process, makes recommendations and tracks actions to drive continuous improvement.

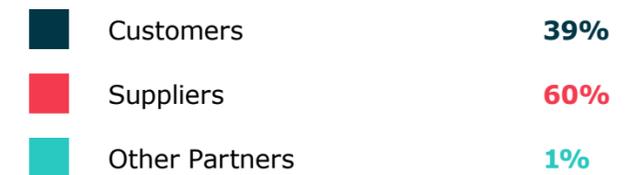
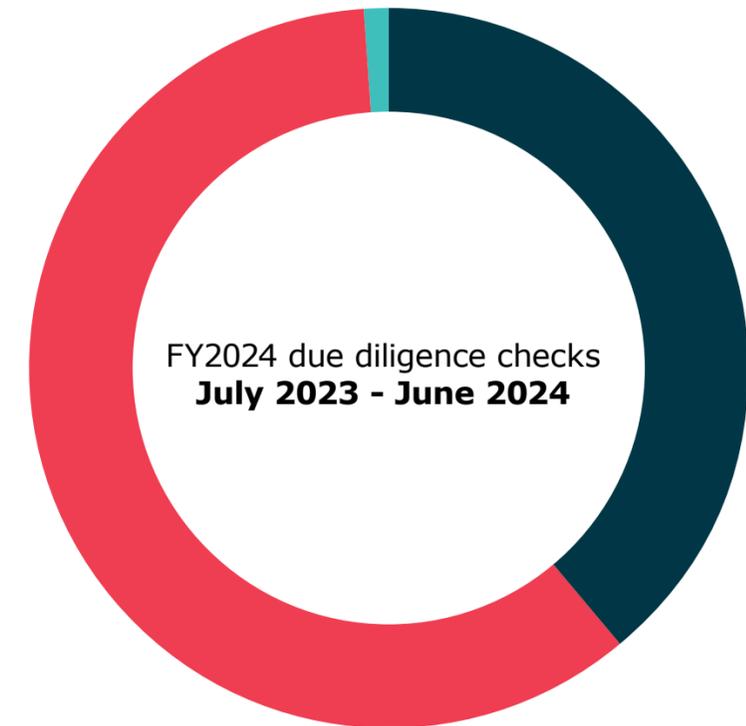
At a program level we implement and track our progress through our MSWG and utilize our modern slavery scorecard and program KPIs (refer to effectiveness section for more information).

# 9,603

Total number of due diligence checks FY2024

# 5,746

Total number of supplier due diligence checks FY2024



## Due Diligence continued

### Communicate externally

#### 5 Step 5: Communicate how impacts are addressed.

We report our Group level progress within our Annual Report, Group Modern Slavery Statement and the UN Global Compact Communication on Progress reporting.

In FY2022, we disclosed a finding of modern slavery in our operations and responded with remediation efforts. You can read more in our [FY2022](#) and [FY2023](#) statements.

### Grievance and remediation

#### 6 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 the company can raise concerns. Our Ethics Helpline [worleyethics.com](http://worleyethics.com) is operational 24 hours, seven days a week. Eight languages are available when making a report on the website, and users can also request translation services via telephone. It was created in line with the UN Guiding Principles and our Whistleblower Policy.



We promote via our internal intranet as well with posters that describe how to report, information on modern slavery indicators and include a QR code, which when scanned, takes users to the Ethics Helpline. This makes it easily accessible for those with smartphones. These posters have been translated for our on-site workers into 13 languages.

To ensure our Ethics Helpline maintains independence, it is operated by a third-party provider. There are several methods for reporting, including online and via telephone (where available), to make it easy to access while maintaining security of the data.

Reports from both 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.

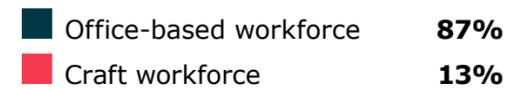
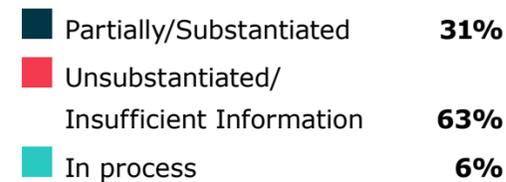
We investigate reports using a consistent approach, and actions are tracked through to completion. Reports are reviewed by our trained investigators, monitored by our Compliance team, and supported by relevant subject matter experts.

We monitor helpline data trends and use them to plan our future actions. To ensure we capture incidents, cases reported to the People team instead of the Ethics Helpline can still be recorded and tracked in the helpline by People team members submitting cases on the reporter's behalf.

In FY2024, our team responded to a total of 246<sup>1</sup> Ethics Helpline reports in relation to a range of issues. 77<sup>2</sup> were substantiated. 0 cases of modern slavery were confirmed through the Ethics Helpline.

In FY2024, there were no findings of modern slavery including forced labor and/or child labor and no requirements for any remediation.

1. Total reports for Canada 28  
2. Total cases substantiated for Canada 10



### CASE STUDY

#### CONDUCTING TRAUMA INFORMED PEOPLE-CENTERED INVESTIGATIONS

In FY2024, we designed an in-house investigation training program centered around how to conduct trauma-informed and people-centered investigations. The training is designed for our Compliance and People teams who are responsible for conducting people-related investigations into forms of harmful behavior. These include bullying, harassment, sexual harassment and also poor labor practices and modern slavery.

The 90-minute session covers how to apply people-centered and trauma-informed approaches in an investigation and how to assess available services (if needed) to those involved, to ensure their psychological support.





# Effectiveness



## Our KPIs

We have key performance indicators (KPIs) with defined and measurable criteria. We track our performance against these indicators over time.

KPI full list	FY2022	FY2023	FY2024	Refer to section
% of our people who completed Code of Conduct	80%	98% <sup>1</sup>	98% <sup>1</sup>	<a href="#">Our approach and actions: Training and awareness</a>
No. of active collaborations and memberships	2	2	2	<a href="#">Our approach and actions: Partnering with industry groups</a>
No. of Modern Slavery Working Group meetings	N/A	5	6	<a href="#">Governance</a>
No. of due diligence checks	11,078	9,923	9,603	<a href="#">Due diligence: Track results</a>
No. of supplier due diligence checks	6,660	5,498	5,746	<a href="#">Due diligence: Track results</a>
No. of helpline languages available	1	7 <sup>2</sup>	8	<a href="#">Due diligence: Grievance and remediation</a>
No. of reports confirmed as modern slavery	1	0	0	<a href="#">Due diligence: Grievance and remediation</a>
No. of helpline reports (total)	180	200	246	<a href="#">Due diligence: Grievance and remediation</a>

1. % 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.

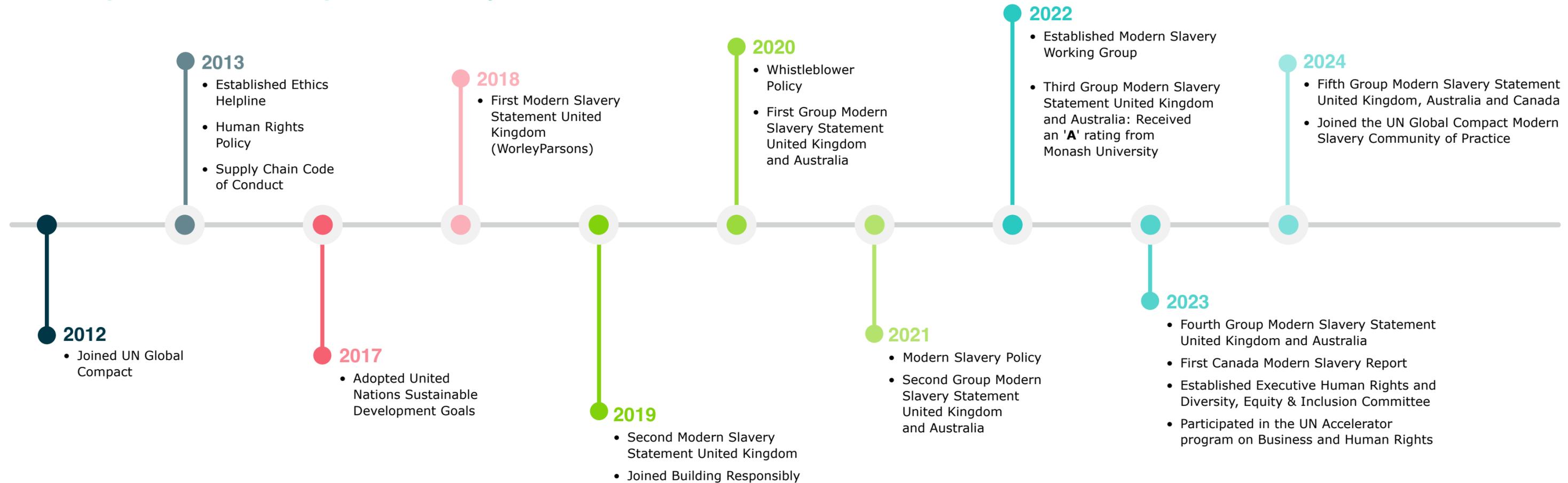
2. Number of languages available for online intake form, translation available on request for telephone.



## Effectiveness continued

### Our journey and progress

Worley has been on a journey for some years and is committed to continuous improvement in respecting human rights and managing the risk of modern slavery. Our FY25 focus is to continue to mature our approach to the due diligence process to strengthen and safeguard against human rights abuses, including modern slavery.



Years represent our financial year.

# 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 must produce a modern slavery statement.

Under the United Kingdom *Modern Slavery Act 2015* entities based or operating in the UK with an annual turnover of £36 million or more must produce a modern slavery statement.

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.

We have included the following entities (wholly owned and controlled) in this report:

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	Private Company	ACN 098 008 818	Australia
Worley Europe Limited	Private Company	04334425	United Kingdom
Worley Group UK Limited	Private Company	02995682	United Kingdom
Worley Services UK Limited	Private Company	04334425	United Kingdom
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 Other – Limited	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 service	Professional consulting services	Equipment fabrication	Construction management	Skilled labor	Import into Canada <sup>1</sup>	Production and distribution <sup>2</sup>
Worley Limited <sup>3</sup>	Australia	✓	✓	✓	✓	✓	-	-
Worley Services Pty Ltd	Australia	✓	✓		✓		-	-
Worley Power Services Pty Ltd	Australia		✓	✓	✓	✓	-	-
Worley Engineering Pty Limited	Australia	✓	✓		✓		-	-
Worley Financial Services Pty Limited <sup>4</sup>	Australia						-	-
Worley Consulting Pty	Australia	✓	✓		✓		-	-
Worley Europe Limited	United Kingdom	✓	✓		✓		-	-
Worley Group UK Limited	United Kingdom		✓		✓		-	-
Worley Services UK Limited	United Kingdom	✓	✓		✓		-	-
Worley Canada Services Ltd.	Canada	✓	✓				I	
Worley Fabricators Ltd.	Canada			✓		✓	I	P S D
WorleyCord Energy Solutions Ltd.	Canada					✓		
WorleyCord LP Other – Limited	Canada				✓		I	S
WorleyCord TeamCo Ltd.	Canada					✓		
Chemetics Inc.	Canada	✓	✓	✓		✓	I	P S D M

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

1. Includes importing materials and equipment produced outside Canada.
2. Includes producing, manufacturing, selling or distributing fabricated equipment in Canada or outside Canada.
3. Worley Limited is the group parent company.
4. Internal corporate services entity.
5. 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.



# Appendices continued

## 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	<a href="#">Appendix 1: Reporting entities</a>
Describe the reporting entity's structure, operations, and supply chains	Describe the organization's structure, business and supply chains	Describe company's structure, activities and supply chains	<a href="#">Structure, activities and supply chain</a> <a href="#">Appendix 2: Reporting entities activities</a>
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 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 the steps it has taken to assess and manage that risk	<a href="#">Due diligence: Modern slavery risks</a>
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 the steps taken to assess and manage the 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	<a href="#">Human rights due diligence</a>
	Describe the organization's 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	<a href="#">Our approach and actions: Training and awareness</a>
	Describe all the steps taken to address and remedy modern slavery	Describe measures taken to remediate any forced labor or child labor  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	<a href="#">Due diligence: Grievance and remediation</a>
Describe how the reporting entity assesses the 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 chains	<a href="#">Effectiveness</a>
	Describe effectiveness of steps taken to address and remedy modern slavery		
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)			<a href="#">About this report</a> <a href="#">Governance</a>



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