

Modern Slavery and Human Trafficking Statement 2025

This statement is made by John Wood Group PLC and relates to the financial year ended 31 December 2024. It is made pursuant to the UK Modern Slavery Act 2015 and in compliance with the Australian Modern Slavery Act 2018, setting out the steps the company has taken to prevent modern slavery across the business and supply chain.

May 2025

wood.

1. Our commitment

Wood's long-term vision is to deliver solutions that transform the world. We are a people business, and our mission is to be recognised as remarkable people, trusted by clients to design, build and advance the world. Our vision is to deliver solutions that transform the world, and we view sustainability as a business imperative that underpins our vision. Our approach to sustainability influences our business and our interactions with all of our stakeholders as we seek to contribute to a sustainable future for a world that is safer and more secure, ethical, and equitable.

Sustainability is a core element of our corporate strategy and the actions we take to deliver against our sustainability aims contribute towards the key pillars of our strategy of Inspired Culture, Performance Excellence and Profitable Growth. Our sustainability approach is founded on the UN Global Compact Principles and Sustainable Development Goals and sets out our aims and targets to ensure that sustainability is embedded in all key decision making. Important elements of our approach are our aims to:

- protect, respect and enhance human rights
- ensure that we remain ethical in all that we do by promoting fairness and transparency in business practice
- partner with our supply chain to deliver sustainable growth and development

Our commitment to upholding and promoting the highest standards of human rights goes beyond observance of the Universal Declaration of Human Rights (UDHR). As a member of the UN Global Compact, Wood commits to applying the Compact's Ten Principles including principles 1 and 2 that specifically address human rights as follows:

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

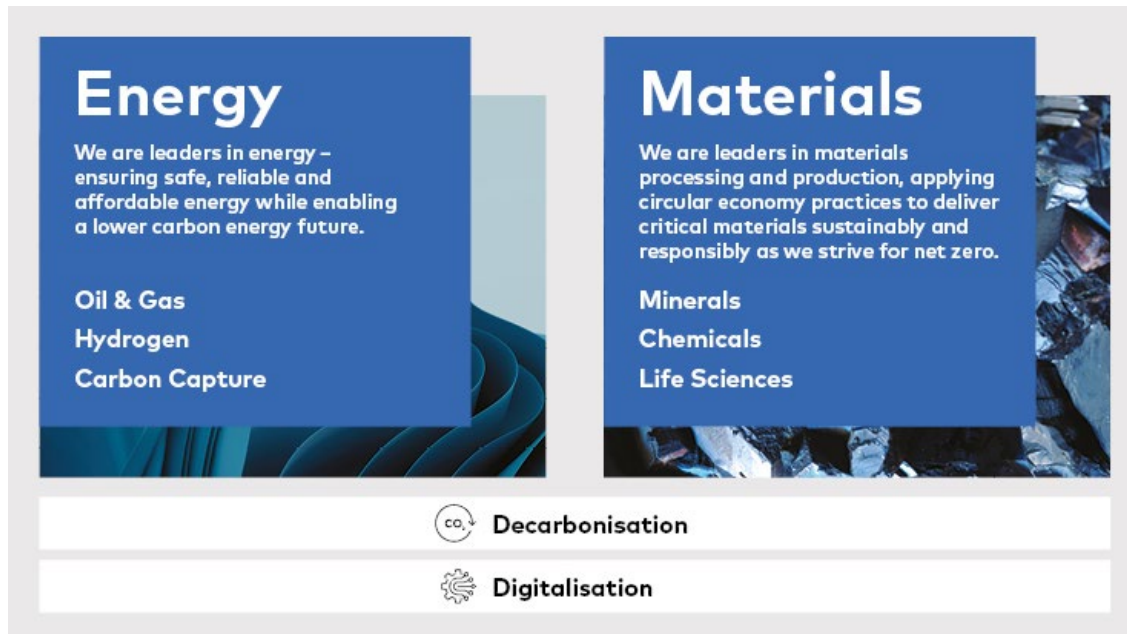
Principle 2: Make sure that they are not complicit in human rights abuses.

Human rights abuse has no place in modern society. We continue to look for ways not only to make sure that we address this directly within our sphere of influence but work with our peers and industry bodies to improve standards, drive down risk and raise awareness across our industry. This is evident through our work with the Building Responsibly organisation.

Read more about our work with Building Responsibly [here](#).

2. Our organisational structure

Wood is a company listed on the London Stock Exchange, headquartered in Aberdeen, Scotland, with over 100 years of history. We operate in more than 60 countries, employing around 35,000 people, with revenues of approximately \$6 billion. The business delivers services across two broad end markets:



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



Consulting

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

Projects

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

Operations

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

As a global business of breadth and scale, we work across a wide variety of client partnerships and contracts globally, from initial concept and design to engineering, procurement and construction management. Our supply chain is vital to the delivery of our solutions globally and due to the nature of our work, we rely on a supply chain that is broad and covers a wide range of supplies including consumables, equipment, labour and specialist subcontractors. Our supply chain is also complex with many layers as our suppliers have sub-contractors and supply chains of their own.

Ensuring our supply chain relationships are equitable, fair, and manage the risk of human rights abuses such as modern slavery and human trafficking, is critical to our success, risk management and reputation. Respectful, fair and honest treatment of everyone we work with is a priority for Wood. Our business is based on relationships and our values reflect the qualities we embody and our underlying approach to doing business. Everything we do is with an unwavering commitment to what we believe in and how we behave, demonstrating our values of:

Care: Working safely, with integrity, respecting and valuing each other and our communities

Commitment: Consistently delivering to all our stakeholders

Courage: Pushing the boundaries to create smarter, more sustainable solutions

3. Governance and leadership

Policies related to modern slavery and human trafficking

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

Code of Conduct	<p>Our Code of Conduct, available in multiple languages, sets out fundamental expectations for all employees on upholding human rights and the Universal Declaration of Human Rights. It codifies our zero tolerance for abuses of human rights, inclusive of modern slavery and human trafficking and is approved by the Board.</p> <p>To underline the importance of our Code of Conduct and its applicability to everyone at Wood and how we go about our business, it includes leadership introductions from the Chair of the Board, Chief Executive Officer and General Counsel.</p> <p>Our Code of Conduct Doing the right thing (woodplc.com)</p>
Supply Chain Code of Conduct	<p>The Supply Chain Code of Conduct is aligned to Wood's Code of Conduct and together these documents set out our expectations of suppliers. These expectations include upholding human rights and zero tolerance of abuses of human rights, inclusive of modern slavery and human trafficking. The Supply Chain Code of Conduct not only requires Wood's suppliers to adhere to its principles but also requires them to reflect the same principles into their own supply chain.</p> <p>Our Supply Chain Code of Conduct also contains our expectation for our suppliers to comply with and promote the Building Responsibly Principles which aspire to be the leading standard on worker welfare in the engineering and construction industry.</p> <p>Supply Chain Code of Conduct (woodplc.com)</p>
Human Rights Policy	<p>Our Human Rights policy states our requirement for our worldwide operations to be carried out in accordance with internationally recognised human rights principles, i.e., the Universal Declaration of Human Right and the guidance contained in the United Nations (UN) Guiding Principles on Human Rights. The policy, which is published both internally in our business management system and externally on our website, sets out our commitment to ensure:</p> <ul style="list-style-type: none"> • no forced, bonded or involuntary labour is used in the production of Wood products or services • overall terms of employment with Wood are voluntary • compliance with all applicable wage and working-time laws and other local laws or regulations affecting the employer-employee relationship and the workplace • freedom of association and recognising the right of employees to join a trade union and to ensure everyone has the right to freedom of peaceful assembly and association whilst ensuring that no one can be compelled to belong to any association • no employment of child labour, forced labour, or condoning child labour, or forced overtime • the development of a working environment which is free from harassment, including discrimination, victimisation and bullying <p>Human Rights (woodplc.com)</p>
Business Ethics Reporting and Anti-Retaliation Policy	<p>This policy aims to strengthen our Speak Up culture, to identify Wood's Speak Up resources, and provide reassurance that all Wood personnel and any third party can raise any concerns in good faith without fear of retaliation.</p> <p>Business Ethics Reporting and Anti-Retaliation Policy (woodplc.com)</p>

Oversight and leadership

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

Safety and Sustainability Committee of the Board	The Safety and Sustainability Committee is comprised of independent non-executive directors. The committee provides oversight of Wood’s management of material sustainability matters, including modern slavery and human trafficking matters, and also oversees Wood’s sustainability programme and performance against targets. It also reviews and makes recommendations on this Modern Slavery and Human Trafficking statement on behalf of the Board, prior to Board approval.
Executive Leadership Team (ELT)	After assuming responsibility for the sustainability function in early 2024, the Chief Strategy Officer ensured that material sustainability matters including modern slavery were given effective oversight through Wood’s sustainability programme. Quarterly engagements with the ELT are used to monitor sustainability matters inclusive of modern slavery and human trafficking and regulatory requirements including this statement.

The President of Sustainability, reporting to the Chief Strategy Officer, has oversight for the execution of Wood’s sustainability programme. In managing the business’s response to human rights, modern slavery and human trafficking, this role works closely with internal functions, operations, and the broader stakeholder base to ensure we continue to demonstrate our commitment to the UN Global Compact.

4. Assessing the risks

Operating in over 60 countries and with an extensive supply chain, we must remain vigilant to the potential risks of modern slavery and human trafficking in all our interactions. Wood has a well-embedded Group risk management framework to identify, manage and mitigate risk across the business. We apply a global approach to managing our human rights risk register with our Group Sustainability function having oversight for the register. Through our assessment of human rights risks across our value chain we have identified two main areas where there is potential for risks to workers from modern slavery and human trafficking issues in our own business or our supply chain:

- In our direct employer/employee relationships, if our human resources policies and practices do not adequately safeguard against potential violations of modern slavery and human trafficking principles
- In our supply chain, particularly in the case of third-party labour suppliers where there is the potential for different standards in relation to working conditions and compensation and in the case of sub-contractors who may utilise recruitment agencies and labour brokers to employ low-skilled and/or migrant personnel. In addition, we recognise the potential for risk in our wider supply network where we procure goods, materials and services for use in the provision of our services. As a service provider, in many instances, Wood is contractually obliged to work with a client's choice of supplier, with variable influence on procurement decisions. Where we can select suppliers, this can often come with restrictions including, but not limited to, ensuring certain levels of local spend/content as part of contractual and legal requirements.

In our direct employer/employee relationships we have a large degree of influence to mitigate the risks through the operation of robust and effective processes and therefore consider this area as representing a lower level of risk to Wood. To ensure we have the appropriate processes in operation, in particular processes to ensure our people are aware of our "speak up" resources and how to raise concerns using local grievance/complaints procedures, our Human Resources function carry out an annual review to identify our employee populations at highest risk. We have determined highest risk populations to be migrant workers, in trade and craft roles, working in countries where there is higher prevalence of human rights issues.

In contrast, we do not have a direct nexus with workers in our supply chain and therefore our ability to influence is indirect, as such we regard our supply chain as being the area with the most significant potential for risk of human rights violations. As a result, we apply increased focus to our third-party relationships taking a risk-based approach that considers factors such as:

- The type of supply, focusing on third party labour or services that our experience and research indicates rely on low-skilled and/or migrant workers often employed through recruitment agencies and labour brokers
- The location of the supplier and where the supply will take place. Whilst modern slavery and human trafficking can happen anywhere, it is a particular risk in countries where human rights are not well enshrined into domestic legal frameworks or are applied less vigorously to migrant worker populations.

Wood is committed to ensuring that suppliers falling into these areas of heightened risk are identified, assessed and monitored as part of our routine supply chain governance and approach to managing the risk from modern slavery and human trafficking.

Much of our work is carried out at client sites or projects, as such, we also recognise our obligation to take steps to ensure that we do not indirectly facilitate human rights violations by contributing to those projects where human rights violations may be present. We have tender governance processes in place, described in section 5, to enable us to assess the potential risks associated with a project prior to tender submission.

Read more on Wood's Human Rights issues at: <https://www.woodplc.com/sustainability/people/human-rights>

5. Due diligence processes

Wood has a number of governance and due diligence processes designed to identify, manage and mitigate human rights risks in our business and supply chain. These processes, set out in the table below, support the policies set out in section 3 and operate continuously in our business. The processes described operated throughout 2024 unless otherwise indicated.

Governance and due diligence processes

Supply Chain Function – Supplier Selection, Evaluation and Management Standard	<p>This Standard details how we manage our governance within the supply chain and is a core and mandatory element of our supply chain management approach. The standard defines the principles and requirements for our supply chain teams in their role to onboard new suppliers and manage existing suppliers to ensure the third parties Wood works with are safe, ethical, meet required health, safety, security, environment, sustainability and quality standards and align to our Supply Chain Code of Conduct. The standard includes a provision that all suppliers, other than certain excepted categories, should be subject to a re-evaluation at least every three years to ensure that suppliers re-affirm their commitments to Wood and uphold our expectations of them.</p>
Supply Chain Function – Supplier due diligence and onboarding processes	<p>Prior to engaging with new suppliers, we conduct due diligence activities across a range of risk areas, including modern slavery. A risk-based approach allows us to focus efforts where they will be most effective. A suite of training and questionnaires are issued to the highest risk suppliers to allow us to better understand the risk profile they may bring to Wood and how we might work with them to close any gaps and implement improvements.</p> <p>Wood maintains a modern slavery watchlist of suppliers to identify any potentially 'high risk suppliers' during the evaluation stage of the onboarding process. The supplier's risk from a modern slavery perspective is determined by a combination of the type of supply, focusing on higher risk services such as provision of labour or those that are typically dependent on a low skilled/low paid workforce (e.g. cleaning or other ancillary services) and geographic location, focusing on those identified in the Global Slavery Index as having high vulnerability to modern slavery. Any suppliers scored as high risk from this review are required to provide further information covering areas such as the composition of their workforce and policies and practices related to workers. Wood's sustainability function uses this information to perform a more detailed assessment to inform its approval decision on whether or not the supplier can be engaged.</p>
Group & Business Unit Commercial Functions - Tender Governance	<p>Wood's tender governance policy provides a framework for a consistent approach to reviewing and approving tenders across the Company. The key aims of the policy are the management of risk, the delivery of expected returns in line with budget requirements and the protection of the business.</p> <p>During 2024, the tender governance policy was updated to pass accountability to each business unit to establish their own tender governance review processes within delegated authority limits and in accordance with the requirements of the policy. This enables each business unit to establish a process that meets their individual risk profile.</p> <p>The tender governance review process in each business unit includes a requirement, at a minimum for larger or higher risk projects and master service agreements, to complete an online tool that assesses a number of risk factors. Those factors consider the potential for the scope to impact on human rights and assesses areas that may give rise to modern slavery and human trafficking risks such as the engagement of migrant workers and utilisation of labour brokers.</p>

Governance and due diligence processes - continued

Human Resources Function – Human Rights	<p>Wood’s people-related policies, procedures and standards are underpinned by our Human Rights Policy and Code of Conduct. Wood’s recruitment and hiring procedure seeks to ensure fair and equitable treatment of all employees across the company. Our standards related to the management of employees seek to ensure the company remains free from modern slavery and human trafficking risks, in particular dealing with approved and competent third parties and upholding the principle of ‘the employer pays’ in terms of recruitment and hiring.</p> <p>It is vital that everyone working on behalf of Wood knows how to raise a concern, but particularly so for those employee populations identified as high risk. Our ‘Speak Up’ resources are included in our global onboarding process and, where possible, we also implement local grievance/complaints procedures and ensure the details of those are included in local induction processes. Our Human Resources Function undertakes an annual assurance review to ensure our global and local induction processes include details of where to access these “Speak Up” and grievance/complaints resources, focusing on the populations identified as high risk.</p>
Group Audit & Risk function	<p>The Group Audit & Risk function provides independent and objective assurance over Wood’s risks, governance and risk management processes. The function regularly undertakes internal audits focussing on aspects of modern slavery and human trafficking, reviewing the adequacy of the processes and controls in place to mitigate against those risks.</p>
Ethics Helpline	<p>Our Ethics Helpline is aimed principally at our colleagues but is also available to others working in our supply chain, customers and the general public. This confidential reporting channel is managed by a third party and reporters can raise concerns by telephone or online in multiple languages and may elect to remain anonymous. All concerns are reviewed, and necessary disciplinary action and/or remedial action is taken as appropriate.</p> <p>Wood’s Ethics Helpline: woodplc.ethicspoint.com</p>
Sustainability Code of Practice (SCoP)	<p>The Sustainability Code of Practice is a tool designed to ensure a systematic approach to onsite awareness and monitoring of sustainability matters at a project site level. Amongst other matters, the SCoP includes consideration of worker welfare matters in line with the Building Responsibly Principles and human rights matters with a view to addressing modern slavery issues at the project site and translating our objectives into tangible actions on Wood projects.</p>

5.1 Building on our progress – steps taken in 2024

Wood’s Sustainability Code of Practice (SCoP) was rolled out in 2023 to complement our governance and due diligence processes by raising awareness of matters such as modern slavery risk and providing guidance on actions that can be taken to address them. In 2024, we took steps to further embed the SCoP in our business through the introduction of a mandatory requirement to complete an assessment of matters included in the tool for certain projects, in particular, those located in countries that have a higher potential risk of modern slavery. Our Operations Business unit has elected to go beyond the mandatory requirements and utilise the SCoP for all new projects and also undertake assurance at the project start-up phase to ensure that a SCoP assessment has been completed.

During 2024, as part of our programme of regular internal audits on aspects of modern slavery and human trafficking, a review was conducted to provide assurance over the effectiveness of the human resources processes and controls in place. The review focused on migrant labour in certain geographic locations and assessed the policies in place to address human rights, practices related to recruitment, employment and visa processing and the existence and effectiveness of grievance mechanisms. These regular audits help to inform our continuous improvement efforts in this area.

6. Addressing key risks

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

Delivering strong leadership

Leadership is fundamental to ensuring Wood's governance processes are embedded across our operations. We place a high value on visible, genuine leadership and set an annual target for the number of engagements to be undertaken by our leadership team with our workforce on health & safety, sustainability and ethics & compliance topics which can include human rights matters. These engagements, whether in the office, on-site or virtual, are key to raising awareness of the issues and our governance processes in place, as well as reaffirming our commitments and guiding our people on our expectations of them. We are focused on continually advancing our assurance activity as we evolve our approach to assessing human rights risks and focus on our evolving risk footprint.

Strengthening our Supply Chain

We seek to manage human rights-based risks in our supply chain through the application of our supply chain code of conduct and the due diligence processes for supplier selection and ongoing supplier re-evaluation, as described above. We believe that the most effective way to drive positive change is through collaboration and education. We provide training modules to support our labour suppliers to understand the importance of worker welfare to Wood and to consider practical steps they can take to embed the principles within their own operations. We also provide a Supplier Support Hub, accessible via the Sustainability pages on our website, to enable all of our suppliers to learn more about Wood's approach to sustainability more generally, our key policies and our expectations of suppliers in support of our sustainability objectives.

Explore our supplier support hub at: www.woodplc.com/sustainability/profit/sustainable-procurement

Responsibly managing a migrant workforce

Managing migrant workers not in the direct employment of Wood continues to be the area we consider to carry the most significant risk. Effectively managing worker welfare, particularly the issues of a migrant workforce, is a cross-industry challenge. We support the Building Responsibly initiative and its 10 Principles for worker welfare, as it seeks to harness the power of cross-industry collaboration to set recognised standards for worker welfare in the built environment and energy sector. Embedding the Building Responsibly Principles into our organisation and business interactions forms part of Wood's approach to upholding fundamental human rights and the interest of those who work for, or on our behalf. We continued to support this throughout 2024 as a member of the Building Responsibly Steering Committee.



Wood has set firm goals for compliance with the Building Responsibly Principles for us and our supply chain, measured as part of our sustainability targets.

The most effective process in managing risk is vigilance. Our employee base has clear working standards detailed in the Code of Conduct, complemented by the SCoP, as do all of our suppliers through the Supplier Code of Conduct. Our higher risk suppliers also provided awareness training and are required to confirm compliance with the ten Building Responsibly Principles.

Wood has established mechanisms for all stakeholders to raise issues through our Speak Up process, including via Responsible Officers, Ethics and Compliance team or anonymously, if required, through the Ethics helpline. All concerns, including allegations of modern slavery and human trafficking, are reviewed and we use the Building Responsibly Principles to assess Human Rights-based allegations.

Learn more on our ethics hotline at: www.woodplc.com/sustainability/profit/responsible-business-practice

Setting sustainability targets

Protecting, respecting and enhancing human rights is one of the core aims of Wood's sustainability approach. We are committed to stamping out all forms of modern slavery and human trafficking in our business and supply chain and upholding the Universal Declaration of Human Rights (UDHR). In line with our work with Building Responsibly and seeking to address risks in our supply chain we have incorporated worker welfare into our sustainability targets. Our targets are to:

- Ensure 100% of our labour suppliers sign up and comply with the Building Responsibly Principles by 2025.
- Ensure 100% of our total suppliers sign up and comply with the Building Responsibly Principles by 2030.

Our Supply Chain and Sustainability functions collaborate closely to ensure delivery against these targets and we report our progress annually through our Annual Report and Financial Statements.

7. Training and capacity building

We continue to build knowledge among our employee networks, taking an integrated approach to human rights awareness and capacity building. The following operated during 2024 to raise awareness:

Code of Conduct certification	<p>Keeping our people up to date with their obligations to Wood as part of our Code of Conduct is imperative. Ensuring we remain vigilant, with a duty to report wrong-doing, or suspicion of wrong-doing, helps to reinforce a strong ethical culture and stays true to our commitment to always do the right thing.</p> <p>For all participants in Wood's Annual Bonus Plan, the outcomes of which are linked to company performance, there is a mandatory requirement to complete a Code of Conduct certification. For all other employees, there is an expectation to complete the certification. In addition, new hires are sent the Code of Conduct to sign their commitment as part of the onboarding process.</p>
Code of Conduct training for new starters	A Code of Conduct computer-based package for new starters, available through our Oracle People system.
Sustainability Training	General awareness training course outlining key material impacts inclusive of human rights and how they affect Wood.
Responsible Officer Engagement	Responsible Officers continue to participate in 1-2-1 engagement on all elements of our Code of Conduct.
Human Rights Awareness Training	<p>This training ensures our employees know what we mean by human rights and what that means within the wood organisation. It also provides insight into Building Responsibly, its worker welfare principles and how we embed these principles in Wood. A version of this training is also available to our suppliers through Wood's supplier support hub.</p> <p>We also undertake targeted human rights training sessions as required. For example, in 2023 our HR leaders undertook training in worker welfare principles, and their role in safeguarding against modern slavery and human trafficking.</p>
Building Responsibly – Supplier Awareness	As part of our actions to achieve our target to ensure 100% of our labour suppliers sign up and comply with the Building Responsibly Principles, we engage with those suppliers and issue them with human rights training. The focus of this training is to help suppliers to understand the importance of worker welfare to Wood and to consider practical steps they can take to embed the principles within their own operations
Sustainability Code of Practice (SCoP)	A key aim of the SCoP is to raise awareness and build capacity to take action at a project site level on a range of sustainability matters including human rights and worker welfare matters.

8. Look ahead

Human rights, inclusive of modern slavery and human trafficking, form an integral part of Wood's ESG risk issues to manage through its enterprise-wide Group risk management framework. Throughout 2024, the President of Sustainability role and oversight by the Chief Strategy Officer, continued to bring a focused level of leadership to Wood's management of ESG risks and to drive continual improvement across all aspects of Wood's ESG agenda. Upholding and enhancing human rights is integral to our success, and Wood remains committed to continually improving standards, not just for the Company but across the industry through our association with Building Responsibly.

The management of Human Rights risks continues to be a priority. We will continue to evolve our management and monitoring of modern slavery and human trafficking, supported by our Group Audit & Risk team, with learnings being shared across the business and functions. During 2025, our programme of internal audits will focus on aspects of our governance and due diligence processes related to managing modern slavery risk to ensure they are operating effectively and/or highlight opportunities for further development. We will also continue to work with our supply chain partners, with a focus on delivering our targets. Working in partnership with our suppliers, we aim to continually raise awareness, learn from each other and share best practices on our collective journey to eradicate modern slavery and human trafficking across the value chain.

Our approach is to steer a course for sustainable development, addressing near-term, medium-term and longer-term steps in our journey. We must take everyone with us on our journey and we do this by putting sustainability at the core of our business. Our response to sustainability is founded on the principles of the UN Global Compact and through our actions we will support the global Sustainable Development Goals (SDGs), embedding sustainability in key business decision-making and considering the implications in the long term.

Name Ken Gilmartin
Position Chief Executive
Date 14 May 2025

Footnotes:

1. This statement was approved by the board of directors on 14 May 2025.
2. This statement applies to all John Wood Group PLC UK and Australian subsidiaries:

Amec Foster Wheeler Energy Limited
Amec Foster Wheeler Group Limited
Amec Foster Wheeler International Limited
AMEC Services Limited
Aus-Ops Pty Ltd
East Mediterranean Energy Services Limited
Foster Wheeler (G.B.) Limited
Innofield Services Pty Ltd
Mustang Engineering Limited
Production Services Network (UK) Limited
PSJ Fabrications Ltd
Rider Hunt International (Australia) Pty Ltd
Rider Hunt International Limited
SVT Holdings Pty Ltd
The Automated Technology Group Limited
Wood (Indonesia) Ltd
Wood Australia Pty Ltd
Wood Field Services Pty Ltd
Wood Group Australia PTY Ltd
Wood Group Kenny Limited
Wood Group Kenny UK Limited
Wood Group UK Limited
Wood Transmission and Distribution Limited