

Modern Slavery Statement 2022

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

[worley.com](https://www.worley.com)

Contents

Modern slavery is a general term for situations in which a person is severely exploited by another for personal or commercial gain. This includes forced labor, bonded labor, debt bondage, domestic servitude, forced child labor, sex trafficking and human trafficking. This statement describes the Worley Group's modern slavery risks and prevention program during the financial year (01 July 2021 to 30 June 2022). It is our third modern slavery statement under the *Australian Modern Slavery Act 2018 (Cth)* and the *UK Modern Slavery Act 2015*.

Programs like this do not happen without commitment and support across the business. This year's statement and program of initiatives has been led by our compliance team with input from other functions within the business including assurance, construction, sustainability, company secretary, engineering, people group (human resources), legal, supply chain management and project delivery.

We deliver this statement via a controlled program of reviews that includes approval by our CEO and The Board.

We welcome questions and feedback at:

ethics.questions@worley.com

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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 waters for more than 60,000 years. We recognize the continuation and importance of cultural, spiritual, and educational practices of Aboriginal and Torres Strait Islander peoples. Artwork by artist, Marlie Albert for Worley.

CEO message



At Worley, we're driven by our common purpose, delivering a more sustainable world. Our ambition is to be recognized as the leader in sustainability solutions.

No project or investment can be truly sustainable without considering the long-term effects it will have on the people connected to it. The whole of Worley, including the leadership team and me, is committed to the protection of human rights and prevention of modern slavery in our operations and supply chains. We respect the fundamental human rights of the people we deal with and will not take part in activities that encourage human rights abuses.

We remain deeply saddened by the events in Ukraine and support the strong response of the international business community in withdrawing from Russia. We have begun the safe withdrawal of our services provided in Russia and we will not enter into any new contracts there. The risk of human trafficking has increased with the displacement of Ukrainians due to the conflict. We continue to monitor the situation and sanctions and to perform due diligence on customers, partners and suppliers who may have links to Russia.

The COVID-19 pandemic continues to be widespread around the world, although its impacts are lessened by vaccination and milder variants. Over the last few years, the pandemic has heightened many modern slavery concerns. In 2021, the number of children in child labor rose to 160 million¹ worldwide due to the impacts of COVID-19, the first rise in nearly two decades.

Modern slavery can be difficult to detect as victims are often isolated by the perpetrators. Being unable to conduct supplier site visits during the COVID-19 pandemic has heightened the risk of not detecting instances of modern slavery. To address this, we have held regular video conferences and remote inspections but acknowledge that being present in person is always preferable.

We were also concerned that employment shortages caused by the pandemic may lead to the increased risk of recruitment fees and bonded labor as people become desperate to find work. To tackle this concern, we conducted a sample survey of our people in high-risk geographies to test if there was evidence of recruitment fees. Whilst the survey did not identify any concerns, we have also conducted due diligence which is reviewed and regularly refreshed on all our third-party recruitment providers.

We are a large complex business with an extensive global footprint and modern slavery continues to be a risk that we strive to prevent and mitigate. In June 2022 we were dismayed to discover a modern slavery issue on one of our projects in the Middle East. Further detail on what we found and how we have remediated the situation is provided in this statement.

We will continue to improve our management of modern slavery through our Modern Slavery Roadmap, developed this year. Our focus for the next two years will be further embedding modern slavery actions in our risk management processes including on our projects, along with detailed mapping of our supply chain.

We are committed to addressing human rights in the way we operate, to uphold the principles of the UN Global Compact and to support the achievement of the UN Sustainable Development Goals.

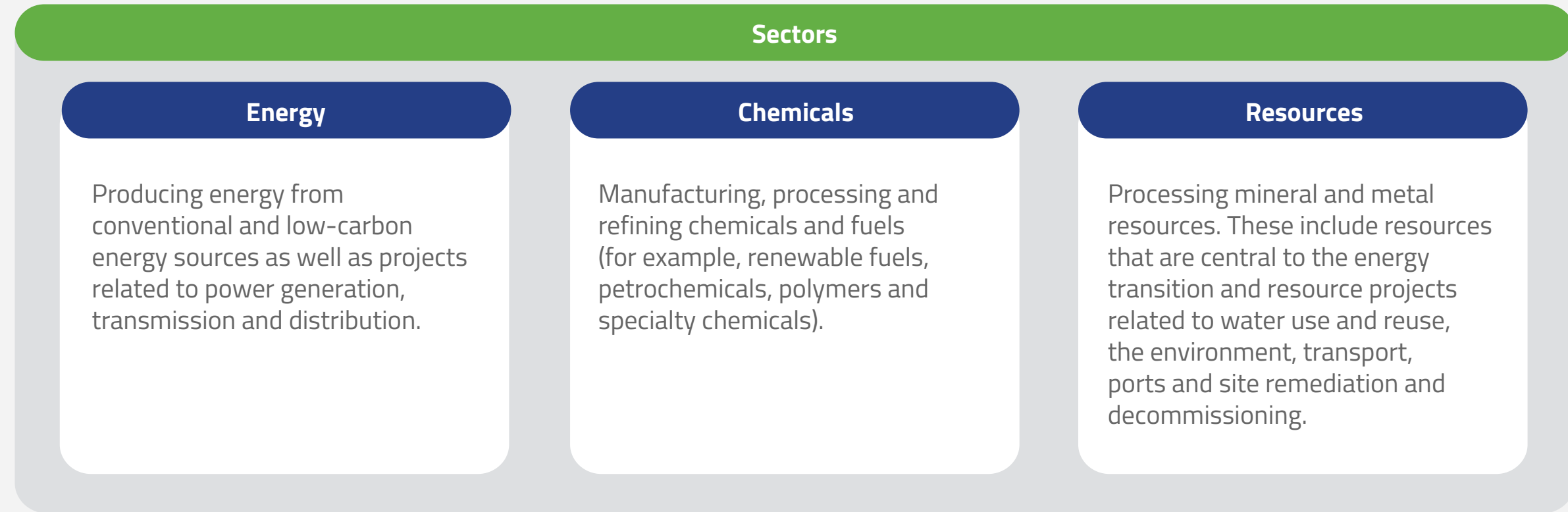
Chris Ashton
Chief Executive Officer
October 2022

1. UNICEF (2021, June 10) *Child labour rises to 160 million – first increase in two decades* [Press release]. Retrieved from <https://www.unicef.org/press-releases/child-labour-rises-160-million-first-increase-two-decades>

Our business and approach

We are a global provider of project and asset services in the energy, chemicals, and resources (ECR) sectors, headquartered in Australia. We are one of Australia's largest exporters of knowledge-based (advisory, engineering design, construction, and asset operating) services. We use this position to support our customers across the world as they transition to a low-carbon future. We bring our customers data- and technology-driven solutions at every stage of the project lifecycle, from initial concepts to sustaining and enhancing their assets.

We are driven by a common purpose – delivering a more sustainable world.



OUR BUSINESS AND APPROACH



Reporting entities and brands

Worley Limited (ACN 096 090 158) is registered at Level 17, 141 Walker Street, North Sydney, NSW 2060, Australia under the *Australian Corporations Act 2001 (Cth)* and listed on the Australian Securities Exchange (WOR).

This is a joint statement of all the entities under the Worley Group that meet the reporting threshold for the *Australian Modern Slavery Act 2018 (Cth)* and the *UK Modern Slavery Act 2015* (further detail on Worley Group entities covered by this statement is provided in Appendix 1). Information in this statement applies to all reporting entities and wholly owned entities unless otherwise stated. All entities that are wholly owned by Worley Limited will be collectively referred to as 'Worley' throughout this document.



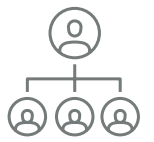
Specialists service brands



Specialists sub brands

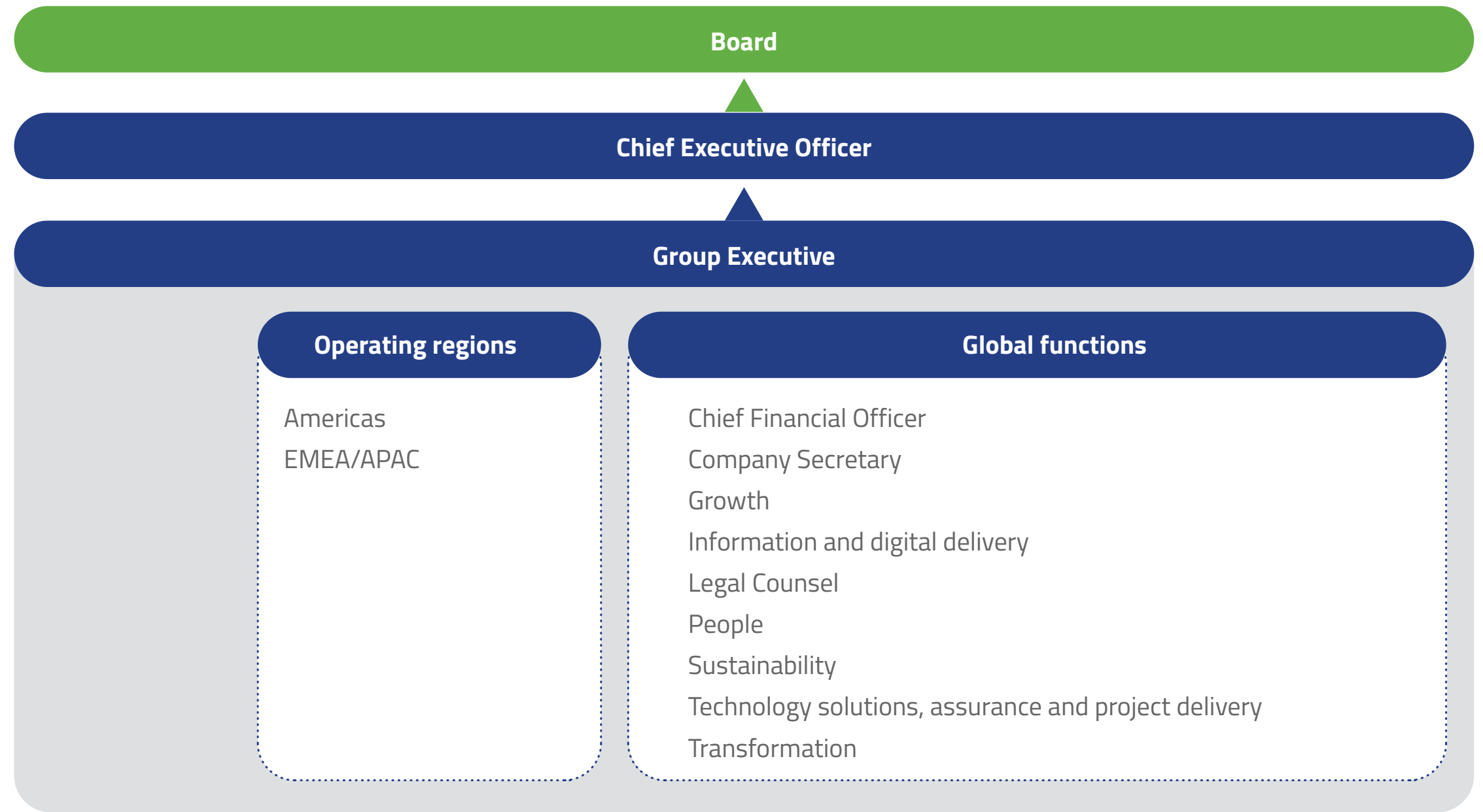


OUR BUSINESS AND APPROACH



Our organization structure

The structure of our organization (right) is built around our geographical reporting regions and our executive functions. Globally, we have 51,000+ people across 46 countries.

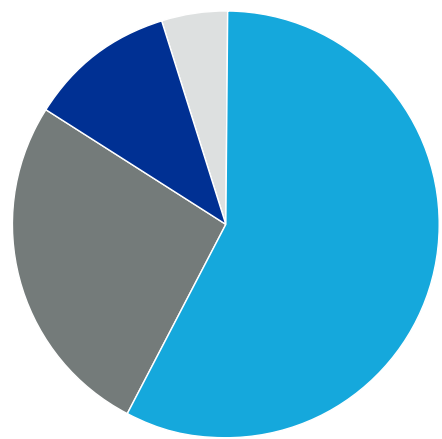


OUR BUSINESS AND APPROACH

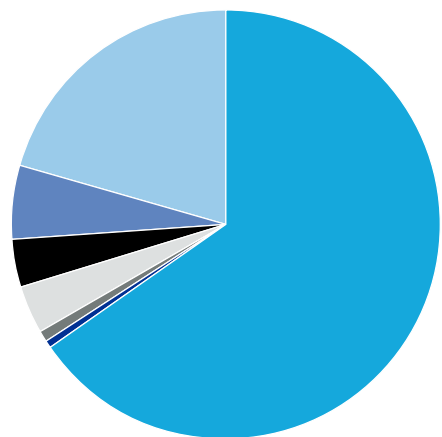


Our people

Most of our people are office-based professionals (employee and contract staff). Craft workers (employee and contract), who are primarily based in the field, make up around a third of our total workforce. The countries where we have the highest number of people are: United States, Canada, and India.



Worker type	Worldwide total
Employee staff	29,747
Employee craft	12,338
Contract staff	6,481
Contract craft	2,712



Location	No. of craft workers
North America	9,864
Europe	3,352
Asia & China	574
Australia & New Zealand	521
Middle East	492
South America	196
Africa	51



CRAFT WORKFORCE FINDING

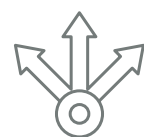
Responding to an incident of Modern Slavery in the Middle East

A craft workforce (90 personnel) was transferred to Worley as part of a contract awarded to Worley. The craft workforce was originally intended to be employed by a local subcontractor to Worley, but the employees were transferred to Worley's direct employment to meet the contract requirement.

An internal investigation completed after the personnel had been transferred to Worley, revealed concerns relating to modern slavery. The concerns included employment contracts, remuneration, working hours and accommodation arrangements that were implemented by our local subcontractor that did not meet the minimum Worley standards.

The identified concerns and remediation actions taken are presented within the Due diligence and remediation section on page 29.

OUR BUSINESS AND APPROACH



Our approach

Worley is committed to the protection of human rights and prevention of modern slavery in our operations and supply chains. Our culture and values guide our policy commitments and expectations which are set out in our Code of Conduct to ensure we operate responsibly and ethically while delivering a more sustainable world.

In our business



We value Life and believe in the safety, health and well-being of our people, communities, and the environment. Our commitment to respecting human rights of all workers starts in our own operations.

We set expectations in our code of conduct; provide channels to report concerns; have policies and procedures which guide how to identify, and where necessary take action; conduct training and undertake site visits and assessments.



We are stronger together and thrive in real relationships and partnerships. To ensure this we actively monitor our agents and joint venture partners and make sure they align with our expectations and meet our responsible business assessment standard.



We unlock brilliance and are passionate about innovating and learning. Continuous improvement and growth are key aspects of our management system and we regularly update and improve our policies and procedures. Last year, we reissued our FY2021 statement with additional details following feedback on our FY2020 statement from the Monash Centre for Financial Studies and general guidance issued by the Australian Council of Superannuation Investors (ACSI) following a review of statements. This year, we have continued to incorporate feedback to improve our statement.



We rise to the challenge and get things done. We actively engage with leading engineering and construction companies through Building Responsibly to raise the bar in promoting the rights and welfare of workers across the industry. We conducted a review of our own policies and procedures against the UN Global Compact and the Building Responsibly Worker Welfare Principles and updated several policies and business documents accordingly.

OUR BUSINESS AND APPROACH



In our supply chain

Our Supply Chain Code of Conduct sets out the minimum ethical expectations of all our suppliers and contractors that we work with. It also gives us leverage to influence our suppliers as it includes audit and termination rights, and we include it in our contractual terms and conditions with suppliers.

We support local content and small business development. In Australia, we are working with Supply Nation and Reconciliation Australia. In Canada, we are working with the Canadian Council of Aboriginal Business (CCAB) to make sure we are responsibly sourcing from First Nations businesses. In FY2020, we released our first Reconciliation Action Plan (RAP). We have been externally verified as meeting CCAB's Progressive Aboriginal Relations™ (PAR) Committed Phase 1 Criteria and are working towards achieving Bronze status in 2023.

We must also make sure there is a balance between smaller suppliers' resources and our expectations. For this reason, we do not require our small suppliers to publish a formal modern slavery statement as they may not have the resources to produce one every year. We have however developed a basic resource pack of information and provide general guidance to support our suppliers in meeting our expectations, and we require their confirmation that they meet or exceed these expectations.

Governance

Our response to modern slavery is governed at our Board level through the Audit and Risk Committee (ARC). The three lines model (next page) describes our organizational approach to risk management for all risks including modern slavery.

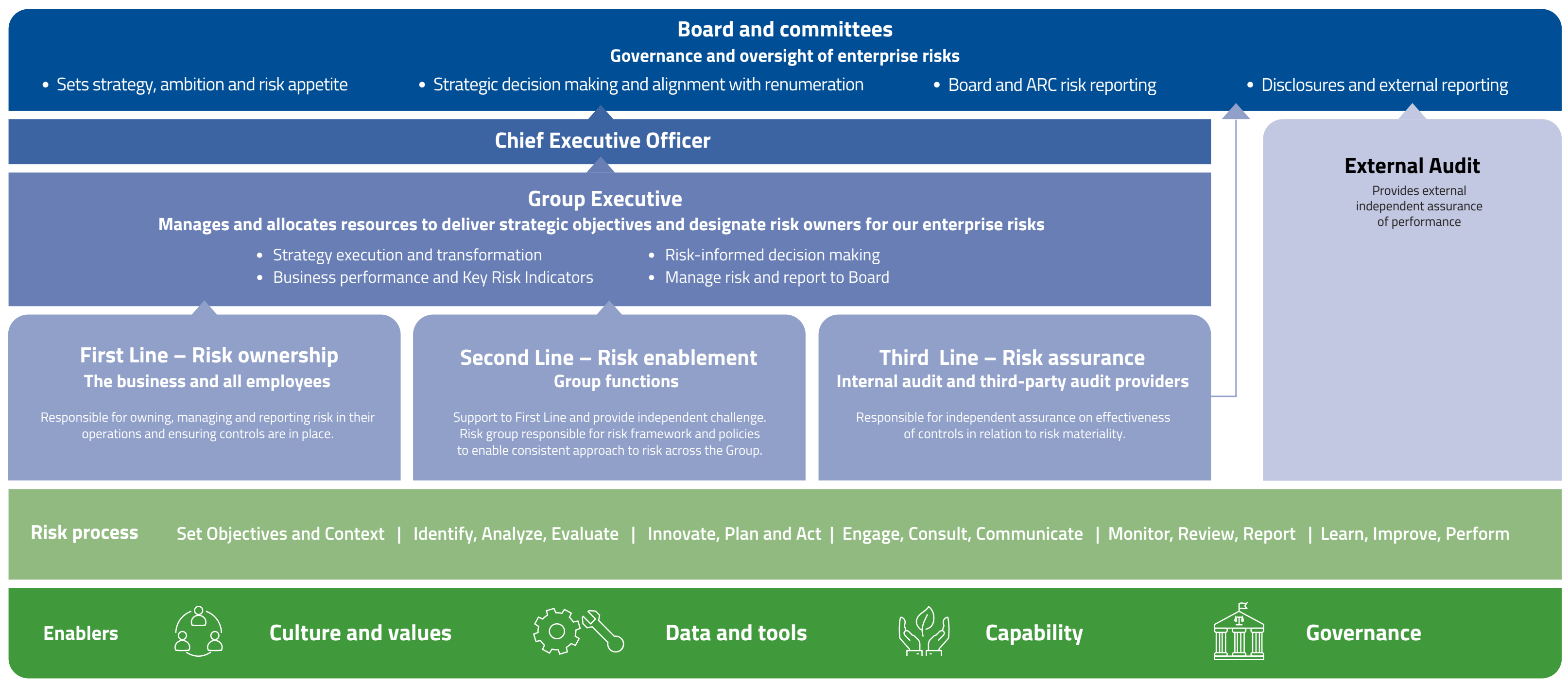
Our risk management framework aligns with the principles and framework of ISO 31000 Risk management - Guidelines and we supplement our assessment of modern slavery risks with the UN Guiding Principles on Business and Human Rights.

Our compliance team (part of the second line) led by our Chief Compliance Officer supports the first line with education and independent challenge; manages our modern slavery prevention program and policies; and completes all requirements against *Australian Modern Slavery Act 2018 (Cth)* and the *UK Modern Slavery Act 2015*.

In FY2022 we commissioned an external review of our corporate risk management processes. This included a review of our risk framework, matrix, and taxonomy. We are now in the process of updating our risk matrix descriptions and have explicitly called out human rights and modern slavery as a category in our taxonomy which will be embedded into our practices from FY2023. This will enhance our system to cascade risks and enable us to drill into and review specific risks such as modern slavery. It will also improve visibility and help to strengthen understanding of obligations, control effectiveness and compliance requirements.

OUR BUSINESS AND APPROACH

Risk Management Framework



OUR BUSINESS AND APPROACH



Our policies

Our modern slavery prevention program is about building a strong culture, supported by policies, procedures, and actions. No document is more crucial to this than our Code of Conduct, which contains our expectations. It provides a clear definition of modern slavery and the types of industries and jobs most at risk. It also reminds our people that modern slavery can be difficult to identify and can occur anywhere, even in developed countries.

Other key policies that support our modern slavery program are available on our corporate governance webpage. These include:

- Modern Slavery Policy
- Diversity and Inclusion Policy
- Health, Safety and Environment Policy
- Human Rights Policy
- Sustainability Policy
- Whistleblower Policy

The dedicated procedure that we use to guide development of our annual modern slavery statement facilitates annual review and improvement of our program and supports compliance with our reporting requirements.



Training

Training is a key aspect of our modern slavery prevention program. It serves to raise awareness about modern slavery issues and how to report any concerns.

For all our people

All our people receive induction training upon joining the company, and refresher training on our Code of Conduct every year. Modern slavery is addressed in a dedicated section in our Code of Conduct and associated training course.

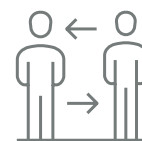
In FY2022, we:

- updated our online induction training course
- promoted Ethics Helpline
- trained our people without access to a Worley computer in the form of group toolbox talks covering all topics in the Code of Conduct, including modern slavery.

In FY2022,

- more than 41,000 people received Code of Conduct training (available in 16 languages including English)
- more than 8,200 people received Code of Conduct training via toolbox talks

OUR BUSINESS AND APPROACH



For targeted groups

In addition to company-wide campaigns, we assigned interactive online courses to key groups. This included our senior leadership team, our people group and supply chain management. The online training was provided by our third-party supplier and covered high-risk industries and countries, and how to report concerns. The training was available in seven languages.

We gave additional 'face-to-face' training to our operational leadership team on International Labour Organization (ILO) indicators for modern slavery. This included examples of how modern slavery could occur in our operations and supply chains. We also provided further resources to our leadership team in the form of lessons learned. These included short summaries of closed helpline cases with the details removed. Our leaders used these summaries as starting points for discussions with their teams to promote the Ethics Helpline and talk about ways our Code of Conduct can be breached.

Other key groups that received additional training were:

- **Helpline investigators.** They received additional training on modern slavery indicators and things to consider when investigating claims. This included checking if the circumstances of the case match ILO indicators and to keep lines of communication open
- **The supply chain team.** We trained 59 members of this group in the use of our due diligence monitoring tool in FY2022.

Engagement and consultation

Our process

During FY2022, the compliance group identified our entities which triggered threshold for being a reporting entity under the *Australian Modern Slavery Act 2018 (Cth)* and the *UK Modern Slavery Act 2015*. A stakeholder group was established to facilitate engagement of representatives from these entities and progress the risk assessment work and resultant actions across the Worley Group. This involved regular meetings to discuss issues, controls and contribute content to the preparation of the joint statement on behalf of all entities. In FY2023 the stakeholder group will be evolved into a Modern Slavery Working Group, our peak body for engagement and consultation across the Group.

Partnering with industry groups

We are a signatory to the UN Global Compact (UNGC) and align our practices with the 10 universally accepted principles in the areas of human rights, labor standards, environment, and anti-corruption.

We have a representative on the steering committee of Building Responsibly, a group of engineering and construction companies that work together and share a commitment to promote and improve the rights and welfare of workers. We're committed to acting ethically and with integrity by supporting and adopting the 10 Worker Welfare Principles.



OUR BUSINESS AND APPROACH

Ethics Helpline

operational 24 hours

[worleyethics.com](https://www.worleyethics.com)

Internal consultation

Each year workshops are held to gather input from internal stakeholders on modern slavery risks and these risks are assessed and prioritized in accordance with our risk assessment process.

We have clear expectations that our people will speak up about violations of our Code of Conduct via our Ethics Helpline, which allows multi-language, 24-hour, seven-days-a-week reporting of ethical concerns by any eligible whistleblower. For more details on our helpline, visit our Access to remedy section (page 28).

All policies and procedures are accessible to our people via our intranet-based management system. Our people are encouraged to submit improvement suggestion via our management system. When new policies and procedures are developed or existing ones are updated, we announce these changes on the intranet and in a summary of the monthly updates. Regular updates ensure continuous improvement of our management system.

Supplier site visits

Asking our suppliers to agree to our Supply Chain Code of Conduct is one thing but making sure they comply with it is another. One of the ways we can check our supply chains is to perform site visits. Our internal supplier quality surveillance (SQS) team manage the third-party inspectors (who are contracted to represent us) who perform the onsite visits.

As a result of COVID-19 travel restrictions, we developed a standard for controlling the use of remote inspections which in the short term led to an increased use of third-party remote inspections via digital technology rather than physical site visits. As restrictions are starting to ease, we are now returning to physical site visits as our first preference wherever possible.

In our last statement, we discussed the modern slavery awareness training delivered to the SQS team and resources created for these third-party inspectors. With this new level of awareness, the SQS team have included modern slavery reporting capabilities as key criteria when evaluating new master services agreements with third-party service providers.

Our supply chain

For the purposes of this statement, “supply chain” refers to all of our direct procurement activities of goods and services. Our focus has been on our direct (Tier 1) suppliers. The suppliers of our suppliers (Tiers 2+) are included as a future focus in our Modern Slavery Roadmap.

We have a supply chain that includes both corporate procurement and project procurement on behalf of our customers. Our spend on behalf of customers is the majority of our supply chain spend at 86%, whilst our corporate procurement, which supports running the company, is 14%.

Our corporate procurement includes our facilities (offices and fabrication yards); information technology (computers, data centers, other IT infrastructure); office and site supplies (uniforms, personal protective equipment, stationary); professional services (corporate consulting, auditing); recruitment costs; travel; and utilities (power, fuels, water, waste disposal).

Our project procurement is the buying we do on behalf of customers and includes the purchase of equipment (industrial process equipment, construction equipment); materials (steel, concrete, other building materials); and workforce (construction labor).

Our supply chain

Corporate procurement (14%)



Facilities 26%



Information technology 50%



Professional services 19%



Other miscellaneous 5%

Project procurement (86%)



Equipment & materials 75%



Subcontracting 25%

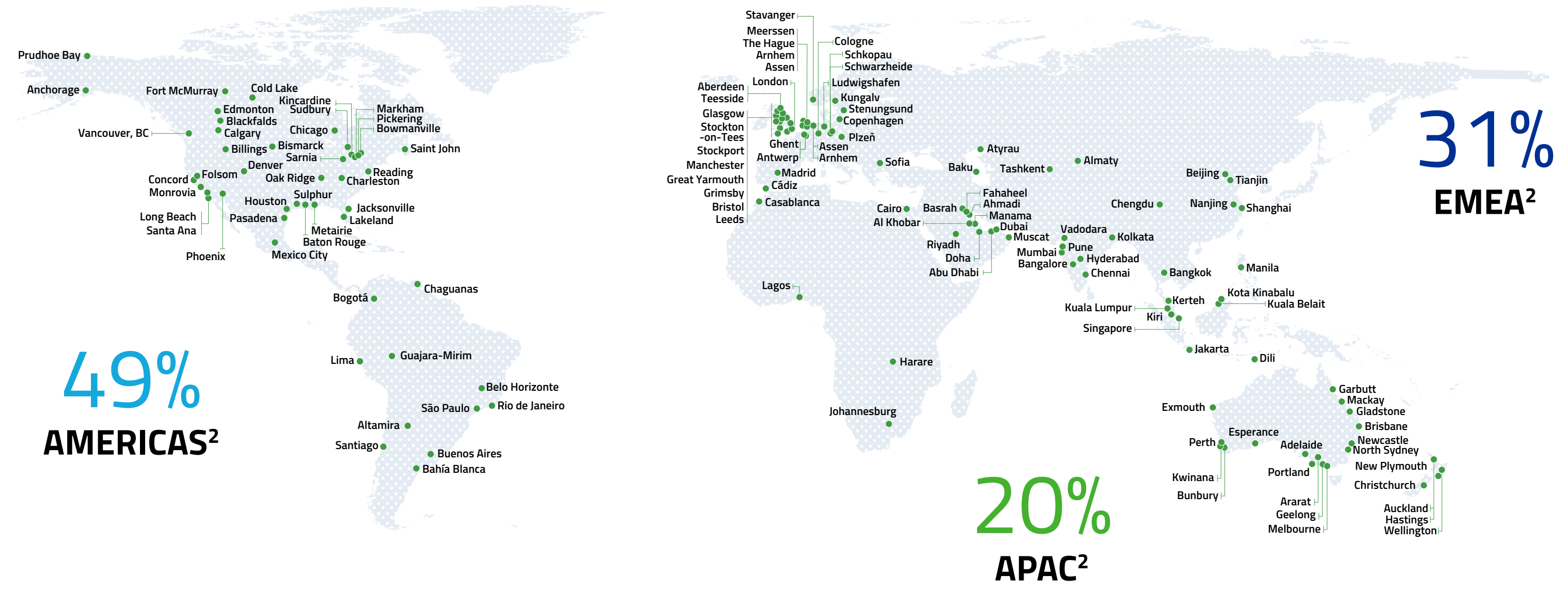
\$3.6 Billion
PROCUREMENT SPEND²

4,500+
DIRECT (TIER 1) SUPPLIERS²

66% Spend
WITH TOP 100 SUPPLIERS²

² represents project procurement spend only.

OUR SUPPLY CHAIN



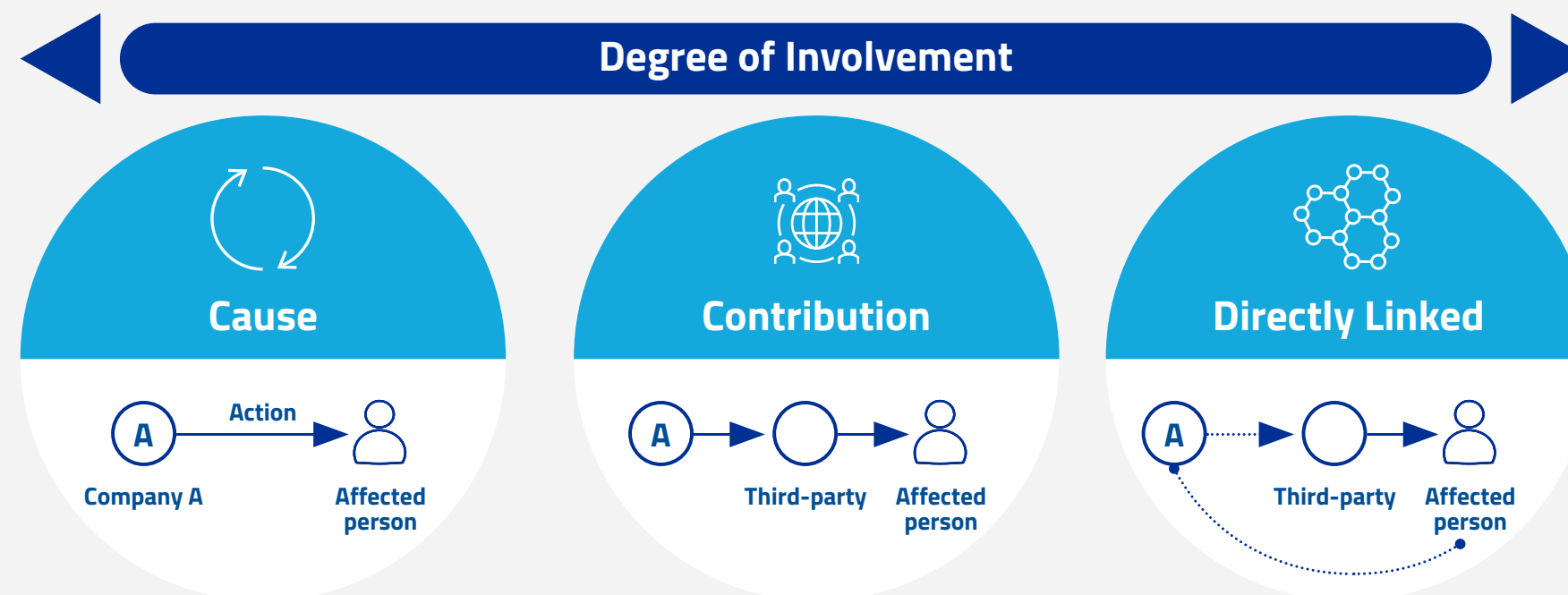
2. represents project procurement spend only.

Our risks and actions

Assessment and management of risk is a key feature of our enterprise management system process. A cross-organizational internal stakeholder group has identified the modern slavery risks detailed in this section. This internal stakeholder group includes representatives from our various functions within our business, including assurance, construction management, engineering, people group, legal, supply chain management and project delivery.

The group uses our company risk classification matrix and the concepts of cause, contribution, and direct linkage, as set out in the UN Guiding Principles on Business and Human Rights. For example, we could:

- cause an adverse human rights impact - if our activities directly result in poor living conditions
- contribute to an adverse human rights impact - if we demand goods and services that are contributing to poor living conditions
- directly link to an adverse human rights impact - through a third-party who is influencing poor living conditions.



We assess and discuss below, the risk of involvement in modern slavery through the following lenses:



OUR RISKS AND ACTIONS



Our people and services

We have identified the following risks related to our people and services.

Table 1 – Our **people and services** risks

Risk Description	Risk Level	Degree of Involvement
Sector risks. The construction and mining industries are considered among the most exposed to modern slavery risks by the ILO ³ . The type of work may be 'unskilled' attracting those without specific qualifications. Construction projects require different levels of workhours/resourcing at different stages and many of our projects take place in remote locations which results in on-site living and short term contacts. Workers can be made up of migrant, transient and seasonal labor. By working in this sector there is an increased risk we could be directly connected to modern slavery through our partners in the sector.	High	Directly linked
Geographical locations. Some of the countries we operate in have a high risk of modern slavery and human rights abuses. COVID-19 and other travel restrictions can limit our ability to visit sites. We could therefore unwittingly contribute to modern slavery risks through having an operating presence in these countries.	High	Contribute
Internal processes. If our internal policies and processes are not kept current with regulatory updates, and our people do not follow our process, there is a possibility that we may cause, contribute, or be directly linked to a modern slavery event.	High	Cause Contribute Directly linked
Recruitment Agencies and other third parties. We may use recruitment agencies and agency workers in our organization. This could lead to high recruitment fees, bonded labor, and having documents (like passports) withheld. We could contribute to the exploitation by using recruitment agencies that directly cause these elements of modern slavery.	Medium	Contribute
Onsite working. Our people may be sent to a customer site as part of a project management consultancy contract. The project field site may be remote, access may need to be controlled for security reasons and our people may need to be accommodated on site. In this situation, our people are more vulnerable, which increases the risk of modern slavery and we could contribute by allowing our people to be placed in that position.	Medium	Contribute
New hires. We may have new hires that have not completed their annual training (even if a part of their onboarding). Being unfamiliar with our systems (such as our Ethics Helpline) may result in an employee not reporting a suspected incident of modern slavery. We could contribute by not having our people properly trained in the systems designed to uncover issues.	Medium	Contribute

3. <https://www.ilo.org/safework/areasofwork/hazardous-work/lang--en/index.htm>

OUR RISKS AND ACTIONS

In FY2022, we undertook a range of activities to address our risks as they relate to our people and services. We:

- actively engaged with Building Responsibly to implement the 10 Worker Welfare Principles. We conducted a review of our policies and procedures against the UN Global Compact and the Building Responsibly Worker Welfare Principles and have updated several policies and business documents accordingly
- rolled out more training for all employees (including the high-risk and on-site personnel). This included new Code of Conduct training, on-site toolbox training, online and 'face-to-face' inspector training, both of which have modules on modern slavery
- developed Ethics Helpline posters (in several languages) for our site locations
- undertook a survey for recruitment fees in high-risk geographies, which revealed no issues
- updated our existing risk assessment of countries we operate in using consideration of the modern slavery prevalence (Global Slavery Index), corruption rating (Corruption Perception Index), government response (Global Slavery Index), our internal audit ratings, sanctions and the number of Ethics Helpline cases reported
- improved our understanding of our specific modern slavery construction risks through surveying our projects with construction scopes of work and suggested improvements for construction policies during the update process.



OUR RISKS AND ACTIONS

In **FY2023**, we will continue to address these risks through the following additional actions.

We will:

- explore additional mobile training options for all our people (both in the office and on site). This will assist in continuing to raise awareness and build confidence in our people to speak up
- work with our people group to give them the necessary skills/knowledge on how to respond when our people report issues to them directly.



CASE STUDY

Wellbeing

In FY2022, we implemented a single provider for our global Employee Assistance Program to make sure our people receive the right level of support, wherever they are in the world. Our EAP partner supports our wellbeing priorities by providing holistic training for our people globally on a range of wellbeing topics (in FY2022, 11 global training sessions on various wellbeing topics were attended by 1,350 of our people).

With remote working continuing to place increasing pressure on our managers, we provided mental health resources, supported by a mental health fundamentals training series, to all our managers globally.

Our Life matters Mental Health Network also continues to flourish. It is a global network of over 300 passionate mental health champions across 30+ countries, connecting regularly to share learnings to help best support our people. We have also added nine new committee members to make sure we are representing all of our geographies.

OUR RISKS AND ACTIONS



Our customers

We have identified the following risks related to our customers.

Table 2 – Our **customer** risks

Risk Description	Risk Level	Degree of Involvement
Customer supply chain and systems. We are often requested to use a customer-approved supplier list. And in some cases, customers have declined to use our supply-chain due diligence systems. We could contribute through procuring goods and services for our customers that have not been subject to our due diligence process.	High	Contribute
Customer site. Our customers usually control the project's location, and the rules on sites where we work. Consequently, we may be directly linked through our customer operations or construction site practices, and these sites/facilities may breach modern slavery requirements.	Medium	Directly Linked

In FY2022, we undertook a range of activities to address our risks as they relate to our customers. We:

- provided our sales team leadership 'face-to-face' training on modern slavery, focusing on our program and our commitments for this year. With this knowledge, the sales team can talk to customers about our modern slavery program and know who to contact within Worley if they need more support
- developed a built-in alert for our internal sales system that will trigger when a project with high modern slavery risks is added
- continued to complete ethical business due diligence checks on all of our new customers. We expect everyone who does business with us to follow ethical standards no less strict than our own.

In FY2023, we will continue to address these risks through the following additional action:

- work with our sales team to further improve early identification of modern slavery risks on our projects.

OUR RISKS AND ACTIONS



Our partnerships

We have identified the following risks related to our joint venture partnerships.

Table 3 – Our *partnership* risks

Risk Description	Risk Level	Degree of Involvement
Non-controlling role. In some joint ventures we are not the controlling entity. This poses a risk as we are not in control of the systems and processes being used to govern the joint venture and we may therefore be directly linked.	Medium	Directly linked
Partner's domicile. In some cases, our partner's domicile results in a legal requirement for us to work in a country. In this case, we take on a passive role and make no operational decisions. We could therefore be directly linked through our partner.	Medium	Directly linked

In FY2022, we undertook a range of activities to address our risks as they relate to our joint venture partnerships. We:

- continued to perform ethical due diligence on all our partners before agreeing to a joint venture partnership
- created guidance documents for joint ventures to help them create their own modern slavery statements
- implemented a new joint venture business process. This process requires an annual risk and compliance review to be conducted by our joint ventures to ensure they meet our minimum expectations which includes adopting our Code of Conduct.

In FY2023, we will continue to address these risks through the following additional actions:

- complete additional checks on business processes and review contracts for our joint venture partnerships where we do not have a controlling interest.

OUR RISKS AND ACTIONS



Our supply chain

We have identified the following risks related to our supply chain for both our corporate procurement and the project procurement we do on behalf of our customers.

Table 4 – Our *supply chain* risks

Risk Description	Risk Level	Degree of Involvement
<p>Number of suppliers. We have thousands of suppliers around the globe, and procurement information is spread across different systems. This limits our ability to manage and understand our supply chain risk.</p>	Very high	Contribute
<p>High risk industries. We could contribute through purchasing the following equipment and services from high risk industries.</p> <ul style="list-style-type: none"> • Industrial equipment and materials. This includes the building materials (such as concrete and steel), electrical and processing equipment, and construction equipment. • Garments for safety and personal protective equipment. Manufacturing of PPE goods is high risk, especially since the start of the pandemic. High risk raw materials include rubber and cotton. • Electronics and IT equipment. For example, producing batteries involves high-risk raw materials, such as cobalt and lithium. • Shipping, logistics and transportation of supplies and equipment. This sector can involve remote locations as well as the crossing of international borders. There is a high risk that workers may not be treated ethically, and they could also be at risk of human trafficking. • Logistics planning and transportation of Worley people. Travel companies can be a risk for human trafficking, forced marriage and other types of modern slavery. • Catering, cleaning, building maintenance, and waste disposal used in our offices and field sites. This is a high risk of modern slavery; these are jobs with minimal qualification requirements. There is a high risk that workers may not be treated ethically, and they could also be at risk of human trafficking. 	High	Contribute
<p>Complexity of supply chain. Supply chains of the ECR sectors, particularly for equipment items and construction materials, can be long and involve sub-suppliers. We are often procuring equipment and materials on behalf of our customers for a single project from various regions of the world.</p>	High	Contribute
<p>Location of suppliers. We have suppliers across many global locations where English may not be the business language, and this could result in miscommunication. Other factors include the local cultural norms, local government policy, as well as COVID-19 and other travel regulations, limiting our ability to visit and monitor suppliers. We may contribute if we are using suppliers that have modern slavery issues in their operations and supply chains.</p>	Medium	Contribute

In **FY2022**, we undertook a range of activities to address our risks as they relate to our supply chain.

- we continued to enforce our Supply Chain Code of Conduct, which sets out the minimum ethical expectations of the suppliers we work with
- we have incorporated supply chain due diligence checks and questions into the work plans associated with milestone reviews of our mega and large projects along with selected medium and small projects. The milestone reviews are being completed by our assurance group
- our due diligence and supply chain management teams have worked together to add our suppliers into our supplier registration tool
- we developed supporting materials for supplier inspections to encourage reporting of modern slavery red flags
- we signed a new master services agreement with third-party inspectors and carried out 30+ supplier inspections between March and June 2022.

In **FY2023**, we will continue to address these risks through the following additional action:

- conduct a search for solutions to increase our capability of supply chain management (linking in with a future single database).



CASE STUDY

Our fabrication yard in Norway

Rosenberg is our fabrication yard in Norway. On site, there is a mixture of offices and fabrication shops as well as accommodation and catering for our people. We have over 60 nationalities represented at Rosenberg and 62% of our people on the site are contingent workers. We have systems and policies in place to prevent exploitation, including:

- verifying age during recruitment, which prevents people under 18 from working on site (apprentices under 18 are permitted but only as part of their education to become a certified trade worker)
- paying all recruitment related expenses necessary to recruit, hire, deploy, and manage workers when third party recruitment providers are used
- auditing our suppliers on topics such as unlawful deductions in salary, working agreements and other rules and regulations
- providing all our people with a written contract, in English and Norwegian language, setting out the terms of employment, including compensation and hours of work (knowledge of Norwegian and/or English is a job requirement in our recruiting processes)
- making only statutory deductions or those agreed in writing in the working agreement, with pay slips available in English and Norwegian
- the blue collar employee cohort has two full-time employee union representatives
- onsite accommodation is based on the Worley Accommodation Standard, adjusted to Norwegian legislation.

OUR RISKS AND ACTIONS



Community

We have identified the following risks related to the communities we work with.

Table 5 – Our **community** risks

Risk Description	Risk Level	Degree of Involvement
Worley Foundation. The Worley Foundation supports local community not-for-profit organizations through monetary funds and skilled volunteering. We could contribute if the not-for-profit organizations don't have ethical business practices.	Medium	Contribute
Local community organizations. Our local offices sometimes organize charity events which can include fund raising and skilled volunteering. We could contribute if the local community organizations we support do not have ethical practices.	Medium	Contribute

In FY2022, we undertook a range of activities to address our risks as they relate to our communities. We:

- assessed all applications for funding from the Worley Foundation in FY2022 through the Worley Foundation Council, a diverse group of Worley leaders across the globe. The assessments were based on pre-agreed eligibility criteria
- also completed additional formal due diligence checks on all our Worley Foundation funded projects, that were funded a year ago
- developed a Corporate Social Responsibility (CSR) Policy developed specifically for our operations in India adhering to the Compliance Act for Corporate Social Responsibility (India, 2014).

In FY2023, we will continue to address these risks through the following additional action:

- include modern slavery risks in the annual review and the governance and risk management criteria for the Worley Foundation.

Due diligence and remediation



Due diligence

Due diligence plays an important role in preventing modern slavery in our supply chains and operations. We perform due diligence on all our business relationships. The level of due diligence depends on the type of relationship, and the risk level. All aspects of our due diligence program are supported by our internal team of due diligence analysts. They use third-party research tools and external due diligence providers for additional expertise. We have rapidly expanded this department team over the past two years and our specialist teams completed over 11,000 due diligence reviews in FY2022. In FY2021, we completed over 8,800 reviews and in FY2020, over 2,300 reviews.

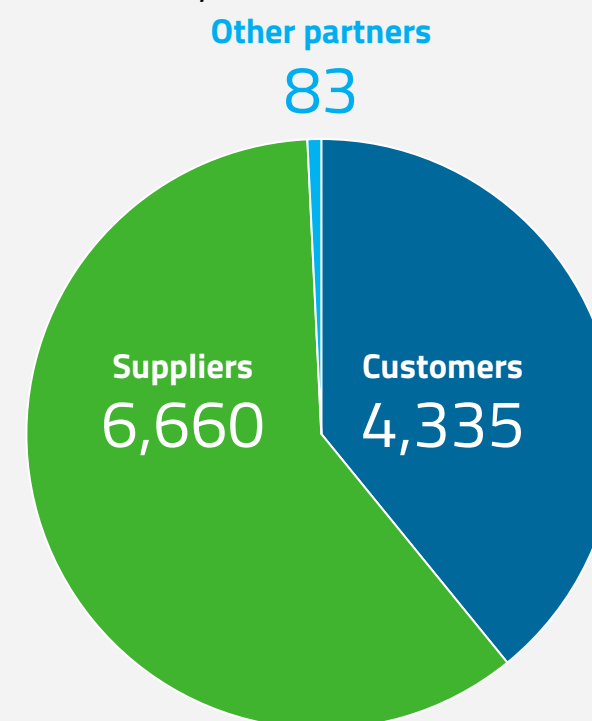
Customer due diligence

Our customer due diligence is integrated into our internal sales system. This means we have centralized alerts when issues are detected, and there's clear communication between our sales and due diligence teams. High risk 'red flags' need approval in line with our procedure. Our due diligence analysts work in partnership with the sales team to understand the red flags and determine the appropriate mitigation strategy.

For example, in response to an Ethics Helpline case, we began discussing how we could capture all potential sanctions risks in our internal sales system. This led to the development of two new features: a specific dashboard used to highlight any proposal potentially associated with a sanctioned country, and a pop-up message to alert the sales team about sanctions risks. This pop-up directs the user to the compliance team for specific sanctions review.

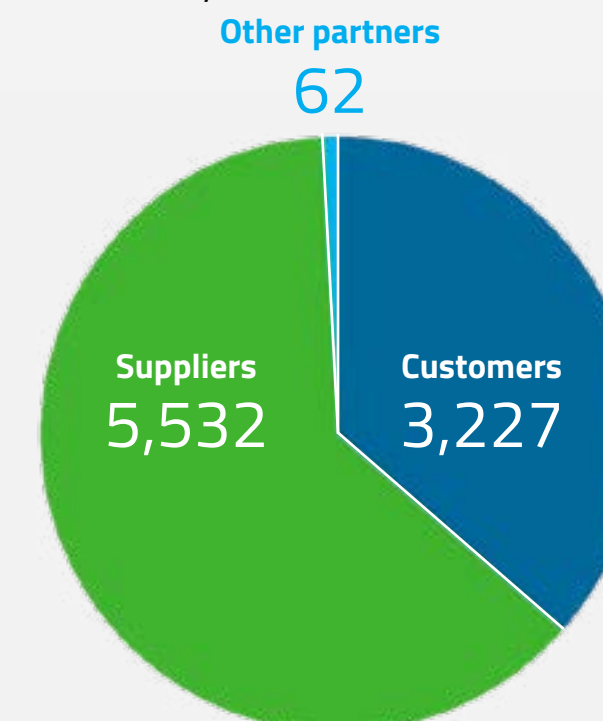
FY22 due-diligence checks

(July 2021-June 2022)



FY21 due-diligence checks

(July 2020-June 2021)



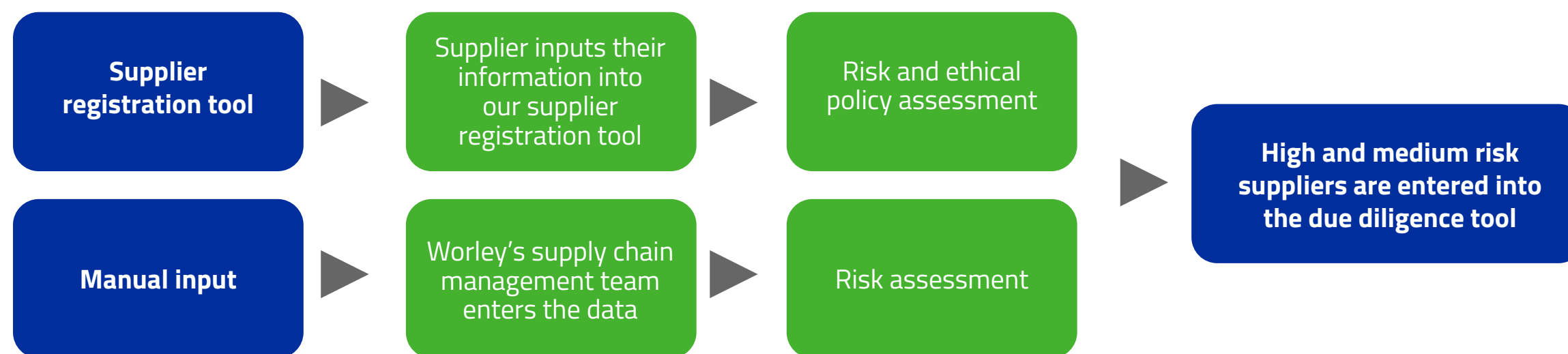
A similar pop-up message was created for proposals with a high risk of modern slavery. This pop-up takes the user to resources online to help understand the modern slavery risks at the proposal stage, and how to contact the compliance team for more details or advice on working with the customer.

A campaign of sanctions awareness was presented across the leadership teams in late 2021 and was followed by an awareness campaign on the internal sales system's new pop-ups when they went live in 2022.

DUE DILIGENCE AND REMEDIATION

Supply chain due diligence

We have two processes for supply chain due diligence. The first and most preferred method is through our supplier registration tool. In the second process, the supplier's information is manually entered by a member of the supply chain team.



In our supplier registration tool, we first perform a desktop risk assessment. During this risk assessment we consider several factors including country risk, size of supplier, product or service being provided and what training they give their people. We also ask our suppliers to upload their ethics policies and procedures for assessment. Suppliers who are found to be high and medium risk because of this assessment undergo further due diligence.

If suppliers and contractors aren't registered in our tool, supply chain management team members can feed their details into a separate risk assessment for modern slavery and anti-bribery. The risk assessment looks at several key areas: country risk, size of supplier and type of service or product being supplied. As with the suppliers in the registration tool, high and medium risk suppliers undergo further due diligence analysis.

The supplier due diligence for both routes include desktop search of publicly available sources and ongoing automated screening against sanctions, debarments, and negative media. Once the assessment is complete, our due diligence analysts aid our supply chain management teams to understand red flags and develop mitigation strategies.

• DUE DILIGENCE AND REMEDIATION

Our supplier registration tool allows us to interact directly with our suppliers so we can offer a resource pack of information and provide general guidance on compliance topics. All suppliers who receive a resource pack are sent a follow up survey to assess the packs usefulness and if it could be improved with more languages and resources. We are using the feedback to improve the support we can offer to our suppliers and will continue to send out the survey.

During FY2022, we contacted over 1,200 suppliers to confirm details about their policies. And we have completed over 1,400 ethics policy assessments in our supplier registration tool.

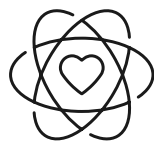
Partners due diligence

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

All new partnerships must have the due diligence approved by our compliance and legal teams, with associated mitigation strategies in place before they can enter into an agreement with us.



DUE DILIGENCE AND REMEDIATION



Remediation and access to remedy

Another core aspect of any modern slavery prevention program is creating robust systems through which people inside and outside the company can raise complaints. Our own Ethics Helpline (worleyethics.com) is operational 24 hours, seven days a week with translation services available. It was created in line with the UN Guiding Principles and our Whistleblower Policy.

To make sure our helpline maintains independence, it is operated by a third-party provider. There are several methods for reporting, including online and via telephone, to make it as easy to access as possible whilst maintaining security of the data. Reports from both within and outside the 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 all actions are tracked through to completion. All 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 make sure we capture all incidents even minor ones, cases reported to the people group instead of the Ethics Helpline can still be recorded and tracked in the helpline by people group members submitting cases on the reporter's behalf. We use real Ethics Helpline cases in our lessons learned programs (without identifying details) to show our effectiveness in closing cases.

In FY2022, we identified and investigated one Ethics Helpline case with modern slavery concerns, the situation found in the Middle East as described on page 7. The remediation actions taken are detailed on the following page.



Ethics Helpline

operational 24 hours

worleyethics.com

Table 6 - Identified concerns and examples of remedy provided for the Modern Slavery finding in the Middle East

Identified concern	Examples of remedy provided
<p>Employment contracts Contracts were written and presented in only English and the local language. Whilst many did understand either English or the local language, some didn't read or write in either language.</p>	<ul style="list-style-type: none"> • Induction training is being conducted verbally in languages understood by the transferred employees to ensure they understand Worley's policies and procedures.
<p>Remuneration The remuneration was low compared to industry standards and Worley's own salary band guidance in the country.</p>	<ul style="list-style-type: none"> • All employees have had their salaries reviewed and have been moved to the correct salary bands where applicable.
<p>Working hours The working hours were on average 25% above the 48 hour contracted hours.</p>	<ul style="list-style-type: none"> • The overtime policy has been updated with a cap to overtime.
<p>Accommodation and living conditions The accommodation was found to be below standard with some health and safety concerns identified.</p>	<ul style="list-style-type: none"> • Accommodation conditions have been upgraded. This includes improvements to ensure safe and healthy sleeping conditions, shared living and cooking areas. • A review of all Worley contracts and projects in the region is being conducted to identify any other situations in which we employ a trade workforce. And where we do, to ensure that their working conditions meet or exceed or applicable standards.

Assessing effectiveness



Our KPIs

We have key performance indicators with defined measurable criteria that we track over time. Between July 2021 and June 2022, we achieved:

- signing of master service agreements between Worley and third-party inspectors. These agreements now require our third party inspectors to understand the indicators for modern slavery and report it if they suspect it
- over 30 supplier inspections/audits between March and June 2022
- ten leadership training sessions provided with over 200 attendees in total. Leadership training and awareness was rolled out through existing leadership team meetings. Compliance team representatives presented information on modern slavery including, the definition, real life cases, International Labour Organization(ILO) indicators of modern slavery and how to report concerns. These sessions were delivered virtually and allowed for focused content and questions
- completion on our initiatives from our FY2021 statement. In the course of this year further actions have been identified to fully implement these initiatives and we will report on ongoing actions in future statements
- one reported case (one substantiated) referenced modern slavery.

In addition, as described in the prior section, our high and medium risk suppliers undergo due diligence checks. A total of 6,600 suppliers were checked by the due diligence team between July 2021 and June 2022. Fifty-eight of those high and medium risk suppliers, that underwent due diligence, were found to have 'red flags'. Details about these 'red flags' were added to the supplier records as information for the supply chain management team.

We routinely seek feedback from our suppliers. We do this using questionnaire, and we also seek feedback on the resource packs that we provide to our suppliers.

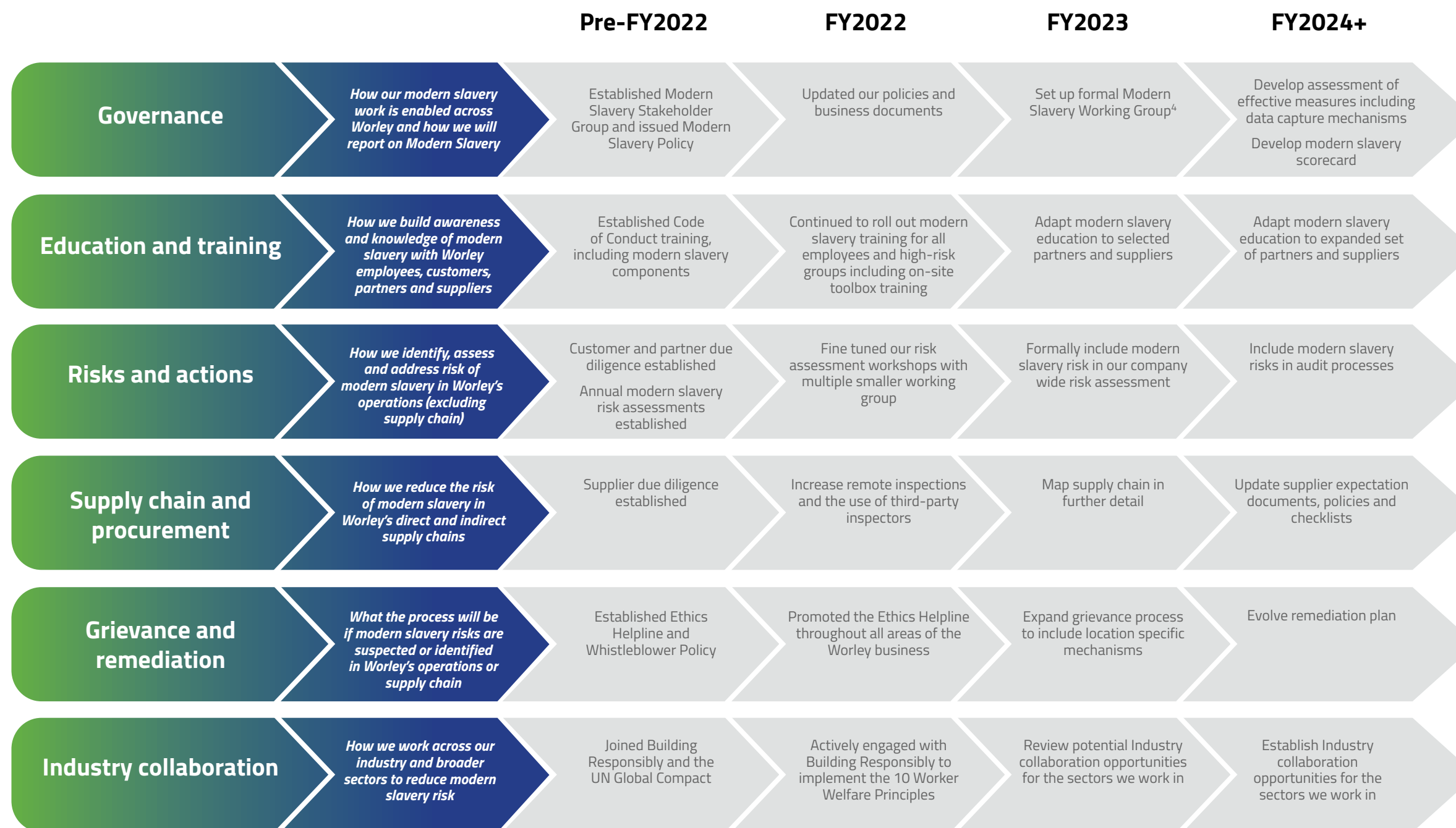


ASSESSING EFFECTIVENESS



Our roadmap

We recognize that improving our modern slavery performance will take time. Our recent finding in the Middle East, is evidence that we have more to do. We are committed to identifying ‘lessons learned’, and improving our processes. Our modern slavery roadmap sets out our plan for the next two years building from the foundation built over the previous years. We will continue to update our roadmap actions to allow for changes in our modern slavery risk profile along with the feedback from assessing our effectiveness.



4. The formal Modern Slavery Working Group is distinct from our original Modern Slavery Stakeholder Group in that it will have broader representation from across our business and will meet more frequently.

Appendix 1– Overview of reporting entities

Under the *Australian Modern Slavery Act 2018 (Cth)* entities based or operating in Australia with an annual turnover exceeding \$100 million must produce a modern slavery statement. Under the *UK 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.

As part of preparing the joint statement under the *Australian Modern Slavery Act 2018 (Cth)*, we looked at which of our businesses were different in nature to the broader Worley Group in terms of risk, organization structure, supply chains and training. Previously, we determined our recruitment company, Energy Resourcing, had different supply chains and risks to the rest of the Worley Group. However, we have now assessed that the difference is small and that it shares similar recruitment and people management risks.

A representative of Energy Resourcing is part of the modern slavery stakeholder group to ensure their specific risks are considered during our annual risk assessment.



APPENDIX 1

Reporting Entity	Relevant Act	Principal Activities During Reporting Period
Worley Services Pty Ltd (ACN 001 279 812)	<i>Australian Modern Slavery Act 2018 (Cth)</i>	An operating technical services business providing engineering, procurement and construction services primarily within the APAC region to the energy, resources and chemicals sectors.
Worley Engineering Pty Limited (ACN 008 876 284)		An asset holding entity for the Worley group of companies globally.
Worley Financial Services Pty Limited (ACN 099 425 831)		A corporate financing entity for the Worley group of companies globally.
Worley Power Services (ACN 112 723 181)		An operating technical services entity business providing operations and maintenance and asset life cycle services primarily within the APAC region to the power, new energy and wind sectors.
Advisian Pty Ltd (ACN 098 008 818)		An operating consulting services business providing services primarily within the APAC region to critical infrastructure, environmental, energy and resources sectors.
Intecsea Pty Ltd (ACN 008 961 260)		An operating consulting services business providing services primarily within the APAC region to subsea systems, offshore pipelines, floating systems and overall field development.
Energy Resourcing Australia Pty Ltd (ACN 076 232 605)		An operating recruitment and contractor management services business located in Australia.
Worley Europe Ltd	<i>UK Modern Slavery Act 2015</i>	An operating technical services business providing engineering, procurement and construction services primarily within the EMEA region to the energy, resources and chemicals sectors.
Worley Group UK Limited		An operating technical services entity business providing engineering, procurement and construction services primarily within the EMEA region to the energy, resources and chemicals sectors.
Worley Services UK Limited		An operating technical services entity business providing engineering, procurement and construction services primarily within the EMEA region to the energy, resources and chemicals sectors.
Energy Resourcing Europe Ltd		An operating recruitment and contractor management services business located in the UK.
Advisian Group Limited	Voluntarily reporting entities	An operating technical services entity business providing services primarily within the EMEA region to critical infrastructure, environmental, energy and resources sectors.

Note: This table lists the Worley entities that meet the reporting threshold for the *Australian Modern Slavery Act 2018 (Cth)* and the *UK Modern Slavery Act 2015*. Also included are Worley entities that have requested to be named as a voluntary reporting entity.

Appendix 2 – Summary of this statement against the UK & Australian regulatory requirements

UK Statement Requirements	Australian Statement Requirements	Where in this document
Clearly name the parent and subsidiary organizations it is covering	Identify the reporting entities	About Worley
Organization structure and supply chains	Describe the reporting entity's structure, operations, and supply chains Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Our organization and supply chains
Policies in relation to slavery and human trafficking	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	Our risks and actions
Due diligence processes		Our approach
Training on modern slavery and trafficking		
Risk assessment and management		
Actions taken in response to modern slavery risks		
Targeting these actions by prioritizing risks		
Making year-on-year progress to address those risks		
Key performance indicators to measure effectiveness of steps being taken	Describe how the reporting entity assesses the effectiveness of these actions	Assessing effectiveness
Steps taken to prevent modern slavery in all the organizations within that group that meet the criteria, and their supply chains	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)	Consultation
Transparent disclosure of any identified modern slavery risks		Our risks and actions