



# Modern Slavery Statement 2023

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

worley.com



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## About Modern Slavery

Modern slavery is a general term for situations where a person is severely exploited by another for personal or commercial gain. This includes forced labor, bonded labor, domestic servitude, 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 2022 to 30 June 2023). It is our fourth modern slavery statement under the Australian *Modern Slavery Act 2018 (Cth)* and the UK *Modern Slavery Act 2015*.

## About this statement

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).

Our Rosenberg operations have separate reporting requirements under the Norwegian *Transparency Act (2022)*, which are not included in this statement.

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. Entities which are not wholly owned by Worley, are referred to as joint ventures.

Programs like this do not happen without commitment and support from across the business. This year's statement and program of initiatives has been led by our Sustainability Performance and Compliance teams with input from other functions within the business including Assurance, Construction, 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 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 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 Baard Baniol artist Marlie Albert from Broome, Western Australia, for Worley.

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# CEO message



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

Modern slavery is one of the world's largest and most complex human rights issues. Its prevalence continues to increase, with an estimated 49.6 million<sup>1</sup> people living in modern slavery around the world. As a large business with an extensive global footprint, we strive to prevent and mitigate the risk of modern slavery in both our operations and our supply chain.

I'm encouraged by our progress and the maturity of our approach. This year, we introduced our Human Rights in Practice framework which puts the United Nations Guiding Principles into action. We also enhanced our governance with the introduction of a new executive level Human Rights and Diversity and Inclusion Committee to act as an advisory body. It will provide strategic oversight, advice, and monitor our progress.

We are committed to the continuous improvement of our program of work in combating modern slavery and we continue to monitor and align our program with anticipated regulatory and legislative developments globally. We had no confirmed findings of modern slavery within our business in FY2023 but continued to remediate the issue found in FY2022 as further discussed in this statement.

We acknowledge that we operate in some high risk jurisdictions which increases our exposure to modern slavery risks. This year we deepened our focus on risk management performance, to enhance our risk controls. This year we committed to the development of our OneSource digital sourcing platform, which when completed over the coming years will provide greater visibility and ability to manage modern slavery risk in our supply chain.

We have a clear position to protect human rights and proactively take action to prevent modern slavery. This position is set out in our commitments and policies, our status as a signatory to the United Nations (UN) Global Compact, our support of the UN Sustainable Development Goals, and our industry membership of Building Responsibly.

**Chris Ashton**  
Chief Executive Officer  
October 2023

# Our business and approach

## Worley purpose, ambition, and values

### Purpose

We're driven by a common purpose: delivering a more sustainable world.

### Our Ambition

Our ambition translates our purpose into what we do operationally. Our five-year ambition is to be recognized as a global leader in sustainability solutions.



### Values



#### We value Life

We prioritize the safety, health, and wellbeing of ourselves and others

We choose what is right over what is quick or easy, in everything we do

We face into important issues and understand and learn from them



#### We Rise to the challenge

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

We believe our can-do attitude makes us reliable, accountable and trustworthy

We're agile and innovative and attentive; focused on being efficient and productive

We get things done



#### We are Stronger together

We seek new and diverse relationships that bring smarter solutions

We demonstrate that our differences make us better by including others and valuing their uniqueness

We advance the best solution for Worley, even if it is not our idea or in our part of the business



#### We Unlock brilliance

We are passionate about innovating and learning

We value, share and grow our expertise

We push our thinking

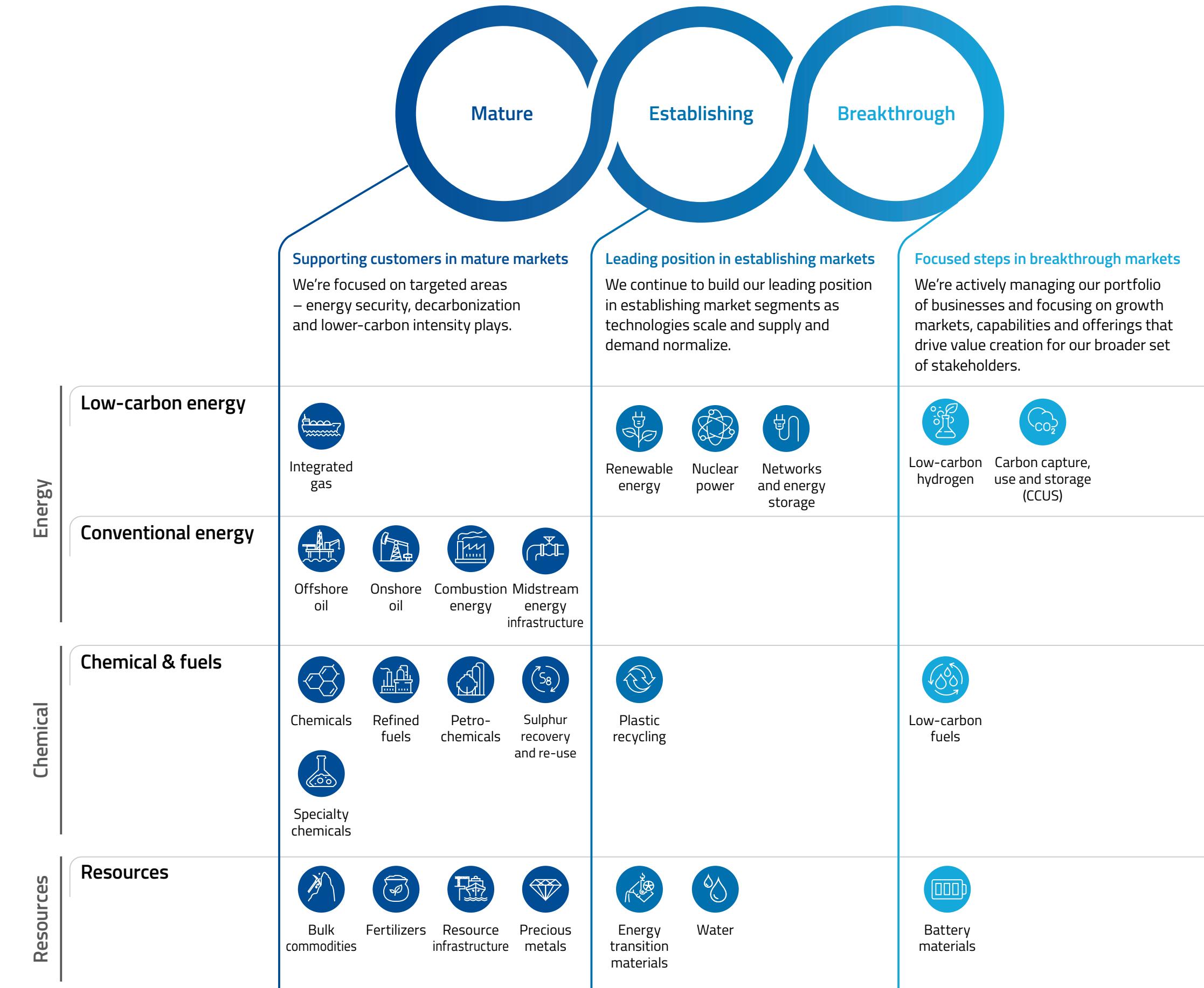
When we can't change a situation, we change ourselves

# Our operations

**Worley: A global company, headquartered in Australia.**

We're a leading global provider of professional project and asset services in the energy, chemicals and resources sectors, driven by a common purpose: delivering a more sustainable world.

We're Australia's largest exporter of knowledge-based services. We use this position to support our customers with solutions to the challenges they face.



# Our brand

Worley Limited (ACN 096 090 158) has its registered office at Level 17, 141 Walker Street, North Sydney, NSW 2060, Australia under the Australian Corporations Act 2001 (Cth) and its shares are publicly listed on the Australian Securities Exchange (WOR). Further detail is provided in Appendix 1.



## Specialists service brands



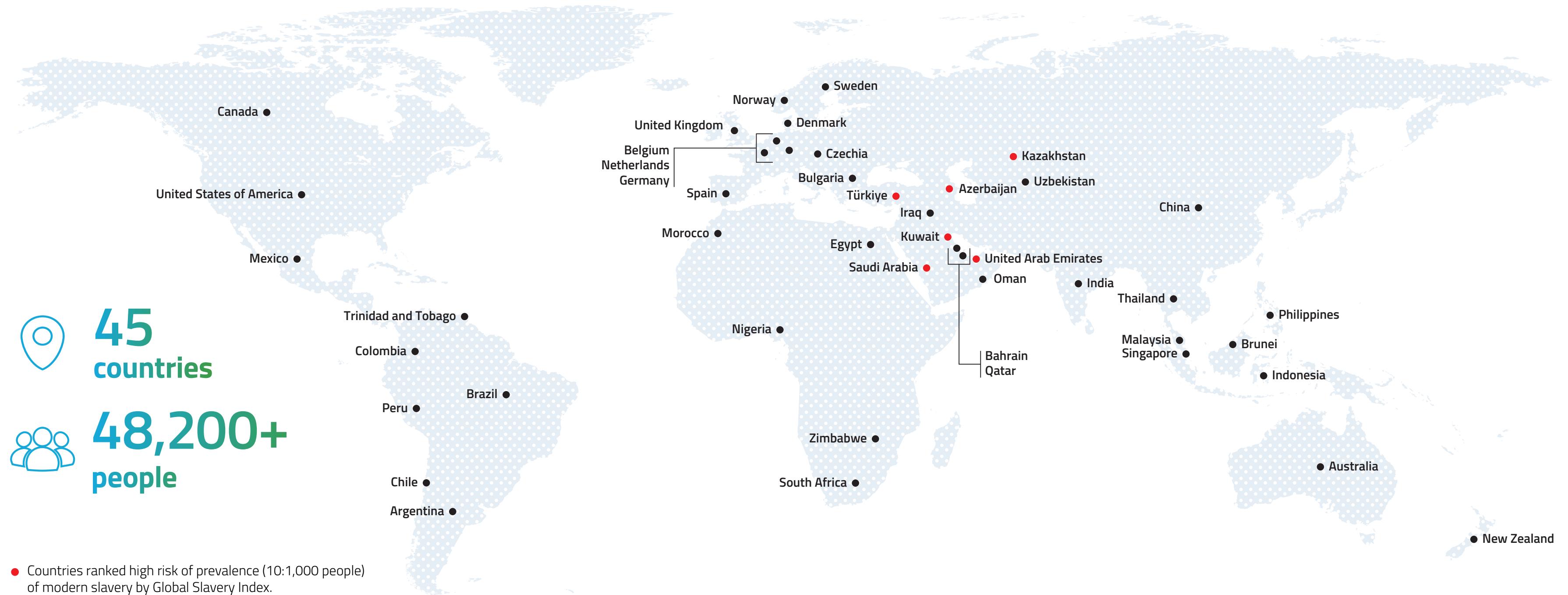
## Specialists sub brands



# Our locations

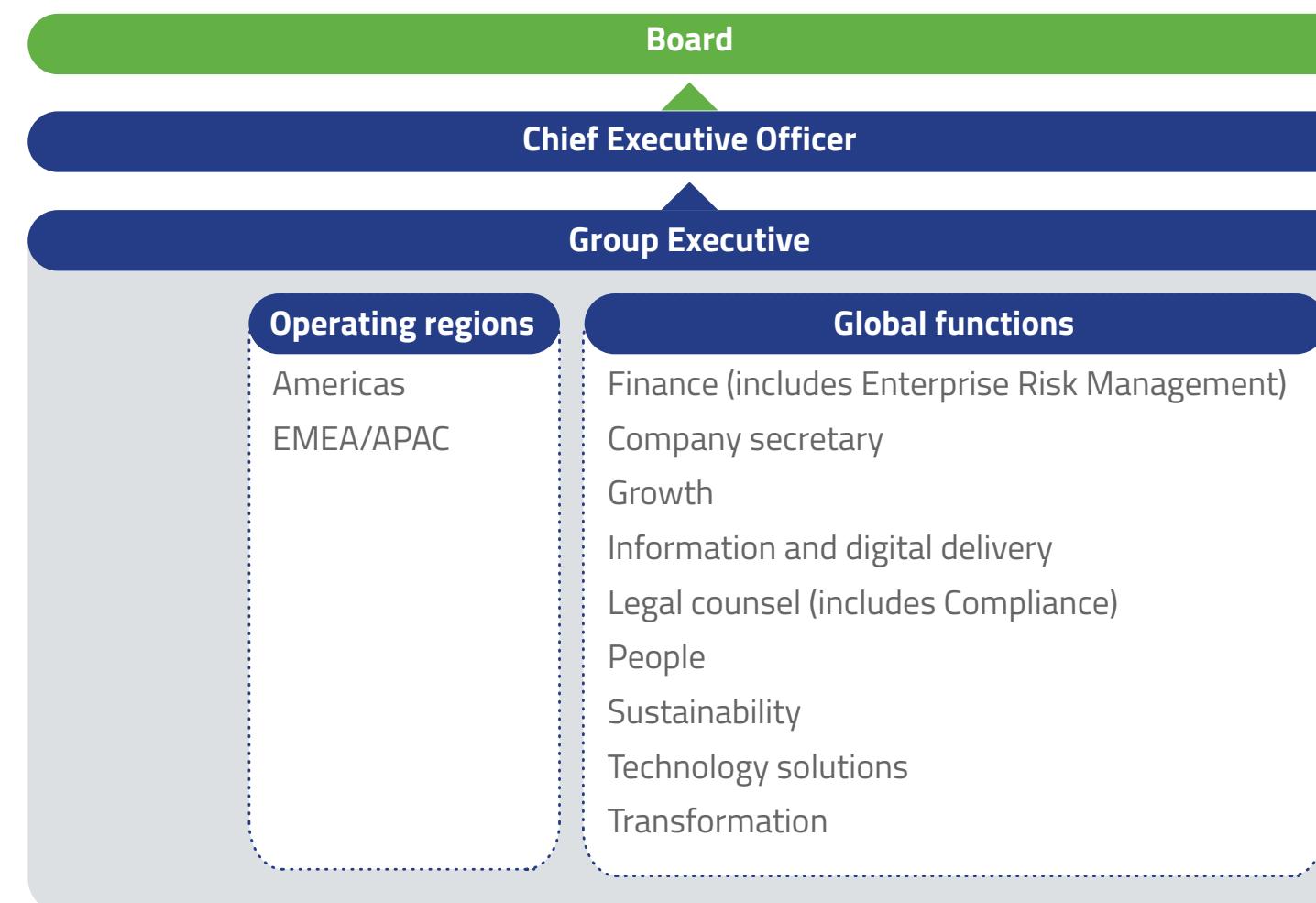
We are a global company, headquartered in Australia.

We have mapped our company office locations to provide an indication of our geographical risk profile.



# Our organizational structure

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



# Our people

We employ

48,200+  
people across

45  
countries

80.7%  
are direct employees

19.3%  
are contract staff

The majority of our people are employed in office-based roles (employee and contract staff). Our craft workers (employee and contract) are primarily field-based and make up 13.5% of our total workforce. This number will reduce in FY2024 due to the sale of our North American maintenance, turnaround and power operation and maintenance business in late FY2023. The countries where we have the highest number of people are: India (6,728), United States (6,389) and Canada (4,481).

# Our supply chain

For the purposes of this statement, "supply chain" refers to all our direct procurement activities of goods and services.

Our supply chain includes both corporate procurement and project procurement on behalf of our customers. Our spend on behalf of customers represents the majority of our supply chain spend at 88%. Our corporate procurement, which supports running the company, is 12%.

Our corporate procurement is the purchasing for our operations (offices and fabrication yards). This includes facilities (property and utilities), information technology (computers, data centers, other IT infrastructure), professional services (corporate consulting, auditing) and other miscellaneous categories (travel, conferences, recruitment and marketing).

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

In FY2023, we embarked upon our OneSource program of work, which will consolidate all our suppliers (across both corporate and project procurement) into one procurement system. This will provide much greater visibility of our supply chain in the coming years.

## Project procurement (88%)



Equipment & materials

75%



Subcontracting

25%

**\$5.1 Billion**  
Procurement spend<sup>1</sup>

**52% Spend**  
With top 100 suppliers<sup>1</sup>

## Corporate procurement (12%)



Facilities

17%



Information technology

50%



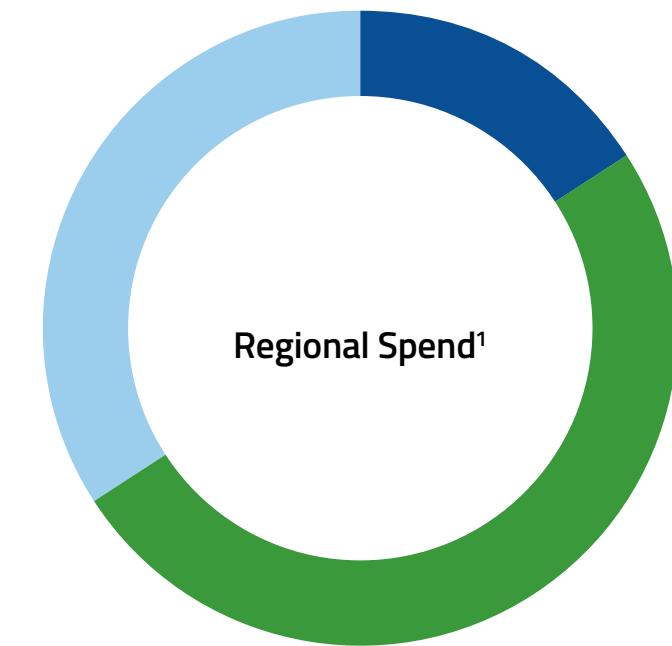
Professional services

26%



Other miscellaneous

7%



<sup>1</sup> Represents project procurement spend only. Dollar figures are presented in Australian dollars.

# Our approach and actions

Respecting, protecting, and promoting human rights is fundamental to delivering a more sustainable world. Our commitment to human rights includes managing any risks related to modern slavery. This encompasses our people, companies we partner with, our supply chain and the communities in which we operate.

We improve our management of 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

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



We're proud to be taking part in the UN Global Compact Business & Human Rights Accelerator program. This is a six-month program that supports our commitment to action on human and labor rights and on establishing effective due diligence processes.

# Our actions

Our FY2023 actions and deliverables demonstrate our framework in practice



## Commit

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

### Our Actions

- Implemented our Executive level leadership and governance through our Human Rights and D&I Committee
- Updated the Supply Chain Code of Conduct



## Assess

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

### Our Actions

- Enhanced our due diligence check program to include broader stakeholders
- Included modern slavery and human rights in our risk taxonomy and risk policies
- Conducted an enterprise risk workshop to review modern slavery risks and to identify controls
- Commenced review of non-controlled entities such as joint ventures to assess exposure to modern slavery risks



## Act

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

### Our Actions

- 43,800+ people completed our Code of Conduct training, which included 7,265 people completing the training via toolbox talks
- 440+ people completed specialist training trainer-led online sessions for key high-risk roles (training was given to the people group, procurement, sales, assurance and the supplier quality surveillance teams)
- Developed a new supplier training program and piloted the training with suppliers and joint venture partners
- Selected system integration consultants for our new OneSource procurement tool pilot with select customers, following an extensive selection process
- Ethics Helpline promoted including adding QR codes to on site posters
- Monitored grievance mechanisms and surveys to identify concerns
- Notified all recruitment providers in writing to agree to abide by the Supply Chain Code of Conduct
- Internal Audit monitoring program added labor hire as a permanent risk for assessment

**Our global modern slavery training covers how modern slavery risks can change with location, sectors and products. We tailor the training to each audience with specific learning points or actions for each group.**



## Monitor

**Measuring and tracking effectiveness.**

### Our Actions

- Measure of program progress against roadmap
- Tracking our Key Performance Indicators



## Report

**Transparent reporting and communication on progress.**

### Our Actions

- UN Global Compact Communication on Progress reporting
- Norwegian Transparency Act (2022) Statement



## Improve

**Continuous evolution of best practice.**

### Our Actions

- Ongoing reviews to refine our program, improve reporting standards and evolve our commitment.

# Our governance

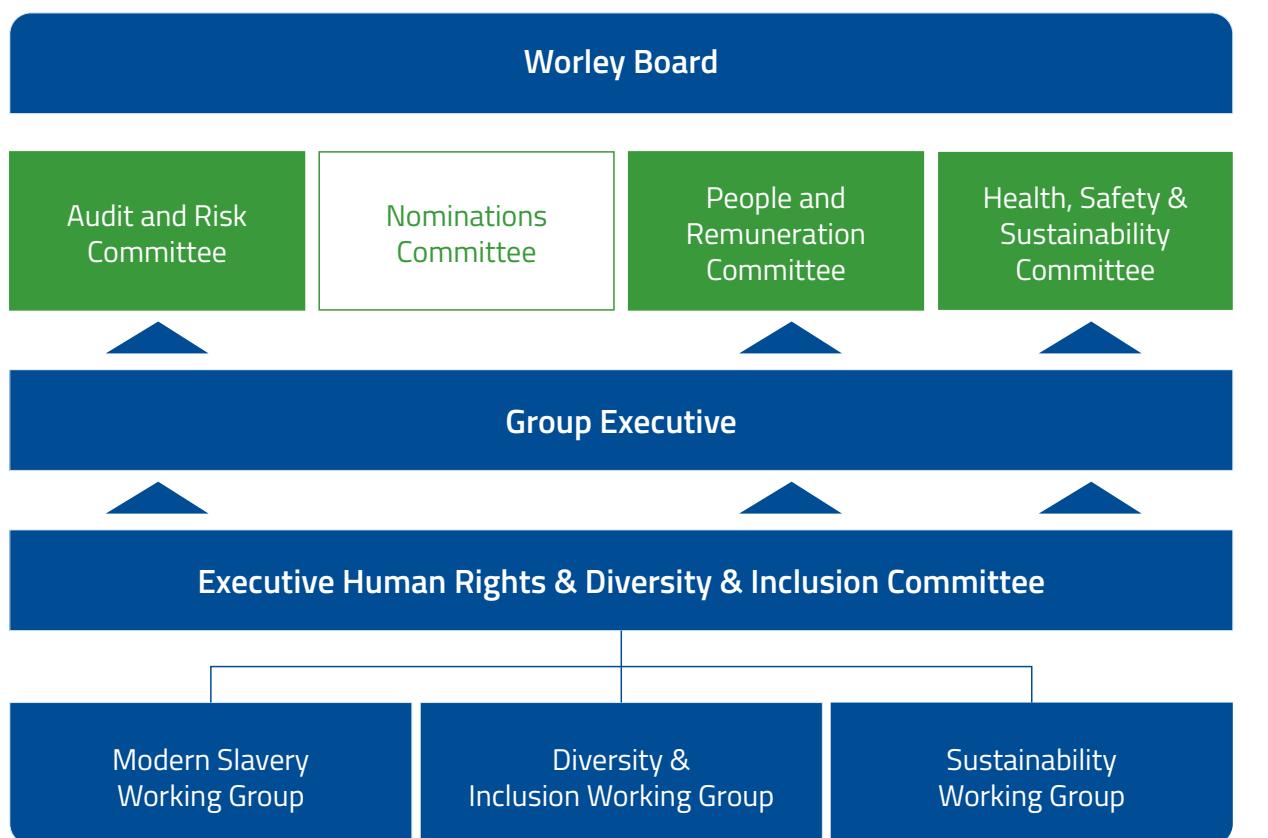
Our Board has ultimate accountability to ensure the Group meets all applicable safety, performance, and governance standards. Our focus on human rights and response to modern slavery is governed at Board level through the Audit and Risk Committee.

Our Board is supported by our new Executive Human Rights and Diversity & Inclusion Committee, which will provide strategic advice for human rights-related matters. The committee will monitor implementation of strategic objectives ensuring alignment with international standards, regulatory requirements, ensure best practice and drive ongoing improvement for people-related risks.

Our Modern Slavery Working Group (MSWG) comprises a broad range of representatives from across the Worley Group, which meets every 2 months.

The purpose of the MSWG is to:

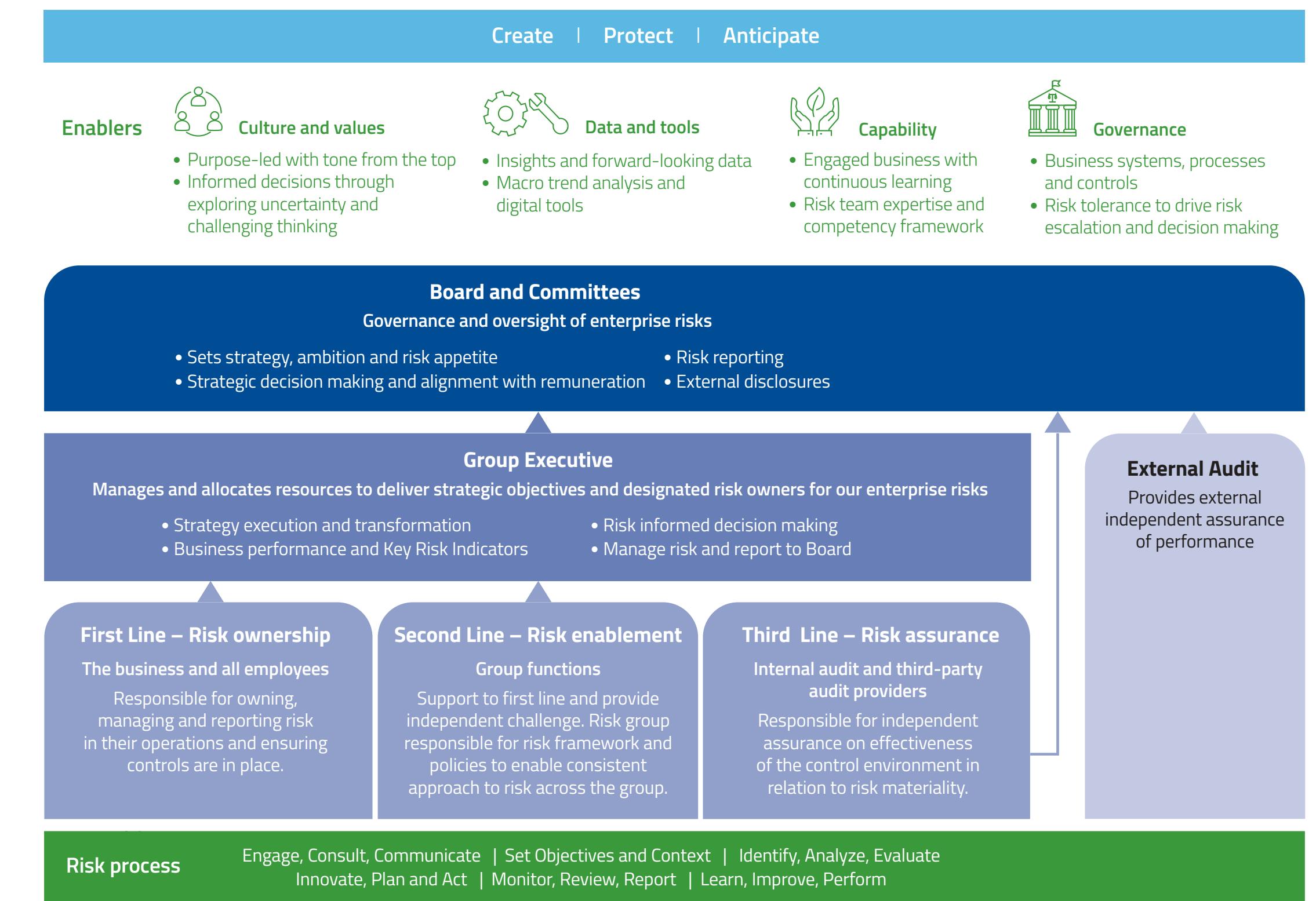
- Be the overarching body that represents and advocates modern slavery prevention and protection of human rights-related activities throughout the Group
- Provide support on important activities in the modern slavery program, including risk assessment, the annual modern slavery statement, and provide support for modern slavery prevention initiatives
- Ensure that modern slavery prevention and the protection of human rights becomes core to our culture, is 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.



# Our risk management framework

The three lines model 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) and we complement our assessment of modern slavery risks with 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 and ensures legislative requirements are managed. In FY2023 we strengthened our risk taxonomy and matrix descriptions and explicitly call out human rights and modern slavery as a category in our internal risk taxonomy. This enhances our system to cascade risks and enables us to drill into and review specific risks such as modern slavery in more detail. This improved visibility also helps to strengthen understanding of obligations, control effectiveness and meet compliance requirements.



# Our policies

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

Our Code of Conduct is communicated to all employees upon their induction and through mandatory refresher training each year. The Code of Conduct training is available in 8 languages and includes a dedicated section on modern slavery awareness. This provides a clear definition of modern slavery, the types of industries and jobs most at risk, and reminds our people of ways to raise concerns should they identify risks in our operations or supply chains.

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

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## Human Rights Policy

Outlines our commitment to respecting and protecting the fundamental human rights of the people we engage and interact with.

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## Modern Slavery Policy

Outlines our commitment to the prevention of any human rights abuses such as modern slavery.

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## Safety, Health and Well-Being Policy

Outlines our commitment and application of laws related to providing a physically and psychologically safe, healthy, and respectful environment.

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## Diversity and Inclusion Policy

Outlines our commitment to a diverse and inclusive workplace where everyone can fully participate and maximize their potential.

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## Sustainability Policy

Outlines our commitment to achieving the United Nations Sustainable Development Goals.

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## Whistleblower Policy

Outlines our commitment to investigating and reporting any unethical conduct and the protection of any person(s) identity making a report.

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## Anti-Bribery and Corruption Policy

Outlines our commitment to honest and ethical conduct in compliance with all applicable anti-bribery and corruption laws.

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## Supply Chain Code of Conduct

Outlines our ethical expectations of suppliers and contractors aligned with our Code of Conduct and policy commitments.

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



# Training and awareness

## Training programs

New starters receive induction training upon joining the company and then all our people are required to complete refresher training on our Code of Conduct every year. We address modern slavery in a dedicated section in our Code of Conduct and our associated training course. We also provide toolbox training sessions for those without access to our online training system.

The online course focused on general red flags for forced labor and the global trends of modern slavery. The toolbox talk focused on red flags of forced labor with a particular focus on forced overtime.

This year's Code of Conduct refresher training focused on raising awareness of modern slavery, factors that increase risk and how to report cases through our Ethics Helpline. We display posters promoting our Ethics Helpline and modern slavery red flags in several languages. Our Ethics Helpline is accessible through our internal homepage. QR codes are also available on posters in our locations to enable quick and easy reporting to the Helpline.

We continue to explore mobile technology options to increase accessibility of training for our people that can work across both office and project sites with our IT group.

In addition to company-wide campaigns, we have run facilitated online sessions for key groups including Supplier Quality Surveillance (SQS), Sales, Assurance, People Group Leadership and Procurement. This training looks at modern slavery globally and discusses how modern slavery risks can change with location, sectors, and products. It has a particular focus on our areas of risk. We tailor the training sessions to each audience, with specific learning points or actions for each group. For instance, the People Group Leadership received training on indicators of modern slavery, to raise awareness of identifying and referring possible cases of modern slavery to the Ethics Helpline. Our Sales team received training on indicators of modern slavery when pursuing opportunities.

We've established a pilot Compliance Champions Network for our Cord business in Canada. We've since expanded it across other Canadian sites, as well as Mexico, and Mongolia. The network meets bi-monthly and includes a training session and a takeaway ethics moment for participants to share with their teams. Topics covered during this period included discrimination and bullying, personal conflicts of interest, and modern slavery.



CASE STUDY

## External training

We have started to offer e-learning training on modern slavery to strategic partners and suppliers outside of our systems. These include:

- Joint venture partners
- Suppliers selected by our procurement teams as strategic suppliers
- Suppliers registered in our supplier registration tool (see page 22 for more details) who do not have their own training program for modern slavery.

Training courses are online and provided by a third party. The courses cover the definitions of forced labor and human trafficking. They also include case studies and guidance for recognizing red flags and illicit behavior.

The training objectives include recognizing forced labor and human trafficking, promoting ethical business practices, and formulating plans to avoid risks of modern slavery.

# Engagement and consultation

## Our process

During FY2023, we upgraded our Modern Slavery Stakeholder Group to a Modern Slavery Working Group. This working group includes representatives from our Assurance, Compliance, Legal, Operations, People Group, Supply Chain Management and Sustainability working across our different sectors.

In FY2023, the committee met 5 times across multiple time zones.

The working group reviewed the FY2023 assessment of our modern slavery risks and provided valuable feedback on areas of risk, degree of involvement and controls we have in place.

## Internal consultation

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

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 monthly summary. Regular updates ensure continuous improvement of our knowledge and management systems.

## Our external partners

We perform ethical due diligence on all our partners. This includes our recruitment providers, business development agents and joint venture partners. See our due diligence section (page 22) for more information.

Globally, we have 200+ recruitment providers. The Compliance team conducts an annual verification process to confirm that recruitment providers have agreed to our Supply Chain Code of Conduct.

We have specific policies to regulate joint ventures and the vetting of potential joint venture partners. These require that our partners meet or exceed the minimum expectations of our policies including our Code of Conduct. This year, we have commenced a review of all our joint ventures (controlled and non-controlled entities) to assess exposure to modern slavery risks.

## Partnering with industry groups

We have two active partnerships relating to human rights and modern slavery.



**United Nations  
Global Compact**

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 \(COP\)](#) which publicly reports on our commitment to sustainability.

In 2023, Worley participated in the UNGC Business & Human Rights Accelerator program. This is a six-month program that supports our commitment to action on human and labor rights and on establishing effective due diligence processes.



We are a board member of Building Responsibly, a group of engineering and construction companies launched in 2017. 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 FY2022, we conducted a review of our policies and procedures against the UN Global Compact and the Building Responsibly Worker Welfare Principles. We updated our human rights policy, modern slavery policy, and other relevant policies and business documents accordingly. We also tested and gave feedback on a worker welfare training course developed by Building Responsibly and the International Petroleum Industry Environmental Conservation Association (IPIECA).

# Our risks

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

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

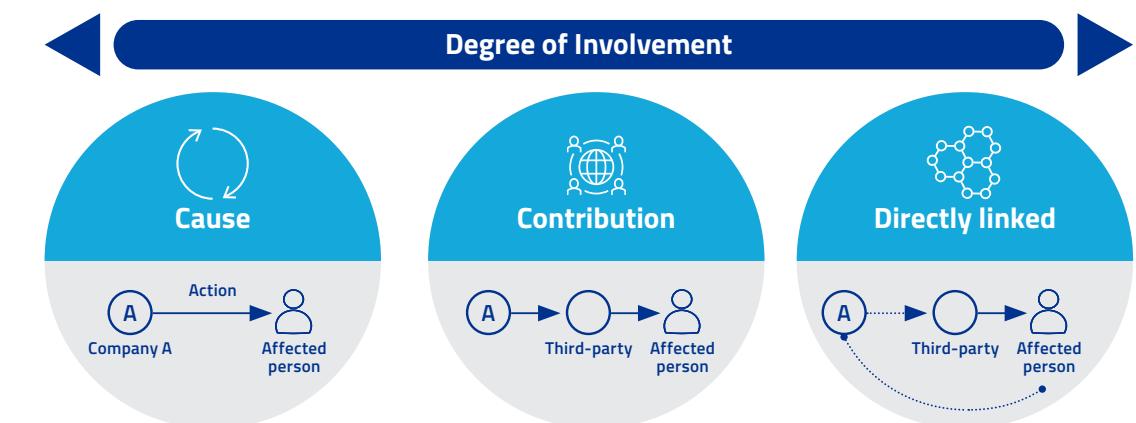
- Human trafficking
- Forced labor
- Child labor
- Deceptive recruitment
- Bonded labor

A key feature of our enterprise risk management system is the assessment and management of modern slavery risks. A cross-organizational internal stakeholder group has identified the modern slavery risks detailed in this section. This internal stakeholder group includes representatives from various functions within our business, including Enterprise Risk, Operations, Construction Management, Engineering, People, Legal, Compliance, Supply Chain Management and Project Delivery.

This 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 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.



When assessing the level of modern slavery 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.

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

Operations → Supply Chain → Stakeholders

# Risk in our operations

Our operational risk of modern slavery 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  |
|----------------------------|---|---------------------|--|
| <b>Sector</b>              | <p>Some of the global sectors we operate in have a high 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><br/>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><br/>The chemicals sector carries some risk in the supply chain, particularly any raw materials required. Risk with the sector itself is relatively low due to the need for highly skilled workforce.</p> <p><b>Resources</b><br/>The resources sector – including the markets of mining, minerals and infrastructure – carries a high 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><br><a href="#">Our risk management framework</a><br><a href="#">Our policies</a><br><a href="#">Engagement and consultation</a><br><a href="#">Due diligence</a><br><a href="#">Grievance and remediation</a> |
| <b>Geographic location</b> | Countries which are known to have higher risks of modern slavery and other human rights abuses often have a weak 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 <a href="#">map</a> )  | Directly linked     | <a href="#">Our locations</a><br><a href="#">Our governance</a><br><a href="#">Our risk management framework</a><br><a href="#">Our policies</a><br><a href="#">Due diligence</a><br><a href="#">Grievance and remediation</a>               |

## Risk in our operations Continued

| Risk Area                                   | Description  | Risk of involvement | Control   |
|---|--|---------------------|---|
| Project scope                               | <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><b>Specific project stage risks include:</b></p> <ul style="list-style-type: none"> <li>Engineering: The use of low-cost 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 <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 high-risk products and services such as raw materials, which can be a high risk of forced and child labor (refer product and services).</li> <li>Operational risks particularly in operations that involve manufacturing, maintenance or logistics carry heightened risk.</li> </ul> | Cause<br>Contribute | <a href="#">Our locations</a><br><a href="#">Our governance</a><br><a href="#">Our risk management framework</a><br><a href="#">Due diligence</a><br><a href="#">Grievance and remediation</a>  |
| Workforce engagement                        | <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>   | Contribute          | <a href="#">Our governance</a><br><a href="#">Our risk management framework</a><br><a href="#">Our policies</a><br><a href="#">Training and awareness</a><br><a href="#">Due diligence</a><br><a href="#">Grievance and remediation</a> |
| Operational accommodation and camp services | <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>   | Cause               | <a href="#">Our governance</a><br><a href="#">Our risk management framework</a><br><a href="#">Our policies</a><br><a href="#">Training and awareness</a><br><a href="#">Grievance and remediation</a>                                  |

# Risk 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 product and services we source or interact with.

| Risk Area                                | Description  | Risk of involvement | Control  |
|--|--|---------------------|--|
| <b>Supply chain complexity</b>           | A complex, multi-tier, global supply chain makes it difficult to have full visibility and control over all suppliers and sub-contractors. This creates a risk of contributing to any forms of modern slavery our suppliers and suppliers to our suppliers may engage in.   | Contribute          | <a href="#">Our governance</a><br><a href="#">Our risk management framework</a><br><a href="#">Our policies</a><br><a href="#">Due diligence</a> |
| <b>Customer supply chain and systems</b> | 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><br><a href="#">Our risk management framework</a><br><a href="#">Our policies</a><br><a href="#">Due diligence</a> |
| <b>Products and services</b>             | <p>Certain products and services carry inherent modern slavery risks, particularly if they are sourced or engaged from high-risk geographies.</p> <p><b>Electronics and IT equipment</b></p> <p>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> | Contribute          | <a href="#">Our governance</a><br><a href="#">Our risk management framework</a><br><a href="#">Our policies</a><br><a href="#">Due diligence</a> |
|  | <p><b>Industrial equipment and materials</b></p> <p>Industrial equipment and material required for building and construction, electrical and / or processing equipment can be high 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></p> <p>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></p> <p>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></p> <p>Garments for safety and personal protective equipment manufactured in high-risk geographical locations and or that require raw materials such as rubber and cotton carry higher risk of forced labor including child labor.</p>  |                     |  |

# Risk 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   |
|--|---|-------------------------------|---|
| <b>Customer-controlled operations</b>        | 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<br>Contribute | <a href="#">Our governance</a><br><a href="#">Our risk management framework</a><br><a href="#">Our policies</a><br><a href="#">Engagement and consultation</a><br><a href="#">Due diligence</a> |
| <b>Non-controlling joint venture partner</b> | 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.          | Directly linked               | <a href="#">Our governance</a><br><a href="#">Our risk management framework</a><br><a href="#">Our policies</a><br><a href="#">Engagement and consultation</a><br><a href="#">Due diligence</a> |
| <b>Country agent relationships</b>           | 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><br><a href="#">Our risk management framework</a><br><a href="#">Our policies</a><br><a href="#">Engagement and consultation</a><br><a href="#">Due diligence</a> |
| <b>Charitable volunteering and donations</b> | 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, which provides support to local community not-for-profit organizations. | Contribute                    | <a href="#">Our governance</a><br><a href="#">Our risk management framework</a><br><a href="#">Our policies</a><br><a href="#">Engagement and consultation</a><br><a href="#">Due diligence</a> |

# Due diligence

## Due diligence

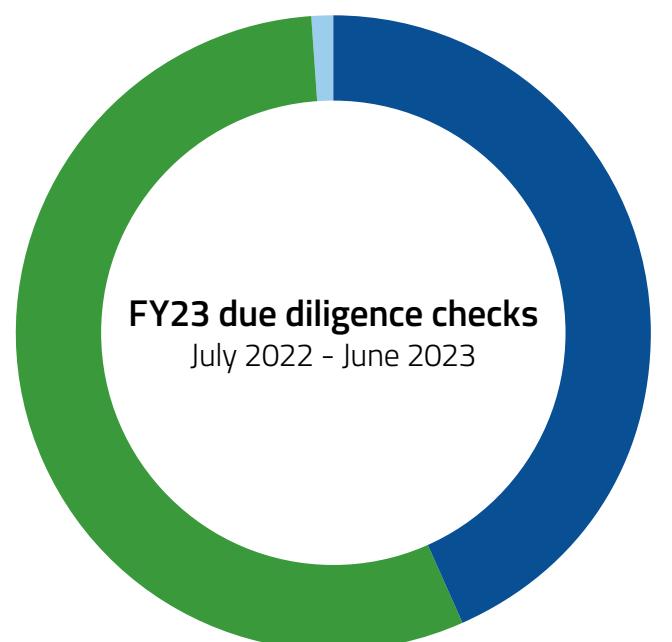
Due diligence plays an important role in preventing modern slavery in our supply chains and operations. When we perform due diligence on all our business relationships, we look for evidence of any historical or current issues related to investigations into corruption, bribery, sanctions, human rights and modern slavery. The level of due diligence depends on the type of relationship and risk level. All aspects of our due diligence program are supported by our internal team of due diligence analysts. We use third-party research tools and external due diligence providers for additional expertise.

**9,923**

Total number of due diligence checks FY23

**5,498**

Total number of supplier due diligence checks FY23



|                |       |
|----------------|-------|
| Customers      | 43.5% |
| Suppliers      | 55.4% |
| Other Partners | 1.1%  |

## Customer due diligence

Our customer due diligence is integrated into our internal sales system. We expect everyone who we do business with to have ethical standards at least as high as ours. We have centralized alerts when issues are detected, and there is 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.

Our sales system includes an alert for a high-risk geographies. This pop-up 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.

## Supply chain due diligence

We have two methods for initiating supply chain due diligence. The first and preferred method is through our supplier registration tool. In the second method, 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 according to this assessment undergo further due diligence and monitoring.

If suppliers and contractors aren't registered in our tool, supply chain management team members can manually feed their details into a separate risk assessment process using the same criteria for modern slavery and anti-bribery. 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 includes a 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.

Our supplier registration tool allows us to communicate directly with our suppliers, and to offer a resource pack of information and provide general compliance guidance to those suppliers who confirm that they do not have policies or training program in place. All suppliers who receive a resource pack are sent a follow-up survey to assess the resource pack's usefulness and if it could be improved with more languages and resources. We are using the feedback to improve support for our suppliers and will continue to send out the survey.

This year, we have increased our due diligence on all our landlords to assess modern slavery risk in building services, such as cleaning. Our new landlords must complete a detailed questionnaire. This includes a range of questions, ranging from modern slavery policy details to hiring cleaning and maintenance staff.

We also continue to monitor our recruitment providers in our due diligence tool and review our list of providers periodically to ensure our list is up to date.

# Due diligence Continued

## 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.

We perform enhanced due diligence checks on all potential joint venture partners by our Compliance team. The due diligence covers understanding their compliance program, as well as performing checks on their shareholders, senior management, and ultimate beneficial owners. If the information provided by the business partner is not sufficient, we outsource the checks to an external service provider.

The due diligence checks on all potential sales agents are outsourced to an external service provider after our Compliance team finishes the initial internal due diligence checks. The results are reviewed by the Compliance, Legal, and Business teams.

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. Mitigation strategies are usually provided when we identify red flags with a business owner or find gaps in their compliance program.

This due diligence also extends to partners of the Worley Foundation. These charities and organizations undergo enhanced due diligence checks by our Compliance team. We screen the board of trustees of charities and senior management, shareholders of sponsorship, and membership requests.

## Supplier site visits

Our SQS visits check that suppliers meet specified technical requirements.

In FY2022, we developed a modern slavery observation card for use where modern slavery concerns are raised by our inspectors. The observation card contains modern slavery indicators (based on International Labour Organisation's Forced labour Indicators) for the inspector to record any findings. The form also includes the web address and QR code for our Ethics Helpline to allow the inspector to report an issue immediately if they have any concerns.

Our Compliance team has completed modern slavery training sessions with our Procurement & Contracts group, including SQS. These training sessions have included the observation card which is now being integrated into our business process. Please see the training section for more details on [page 15](#).



## Site visits

This year, our Compliance team performed site visits to our operations in Chile, Argentina, Mexico, and Mongolia. Training on topics relevant to modern slavery included our Code of Conduct, due diligence training for the sales and procurement teams and respectful workplace training sessions for all site personnel. These sessions covered harassment, intimidation, and discrimination topics.

Our goal was to:

- Focus on middle management and on-site personnel in FY23
- Build a sense of familiarity and confidence in our Compliance team and the Ethics Helpline
- Refresh and strengthen key concepts of the Code of Conduct as part of the improvement and operation growth in the location
- Support our people to feel comfortable identifying and raising ethics issues
- Promote the Compliance Champions group and expand the network to other locations.

We delivered these training sessions in either English, Mongolian or Spanish, depending on the recipients' preference.



# Grievance and remediation

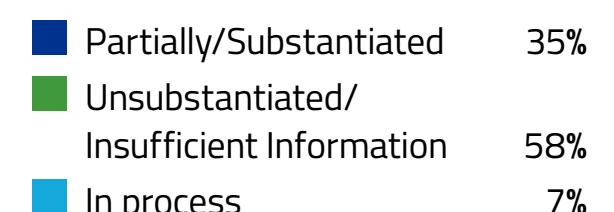
A core aspect of any modern slavery prevention program is creating robust systems through which people inside and outside the company can raise complaints. Our own Ethics Helpline ([worleyethics.com](http://worleyethics.com)) is operational 24 hours, seven days a week. Seven languages are available when making a report on the website, users can also request translation services via telephone. It was created in line with the UN Guiding Principles and our Whistleblower Policy.

To ensure our 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 as easy to access as possible while 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 ensure we capture all incidents, 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 FY2023, our team responded to 200 reports. 70 were substantiated. 0 cases of modern slavery were confirmed through the Ethics Helpline.



## FY2022 modern slavery finding

We previously identified and disclosed one case of modern slavery in the Middle East in our FY2022 statement. We continue to take remedial actions and have been working to improve our internal monitoring systems.

| Identified concern   | Remedy provided FY2023   |
|--|--|
| <b>Employment contracts</b><br>Contracts were written and presented in English only and not the local language. While many did understand either English or the local language, there were some literacy challenges. | Induction training conducted verbally in languages understood by the transferred employees.<br><br>Our Assurance team have added checking contracts for working hours to the terms of reference for all assessments as part of ongoing monitoring. |
| <b>Accommodation and living conditions</b><br>The accommodation was found to be below standard, with some health and safety concerns identified.   | The Assurance team checked the accommodation contracts in the region and no other issues were found. As part of ongoing monitoring, they also included this in the Terms of Reference for all assessments.   |

# Assessing effectiveness

## Our KPIs

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

| KPI full list                                 | FY2022 | FY2023           | Refer to section                |
|---|--------|------------------|---------------------------------|
| % of our people who completed Code of Conduct | 80%    | 98% <sup>1</sup> | Our approach and actions        |
| No. of active collaborations and memberships  | 2      | 2                | Partnering with industry groups |
| No. of Modern Slavey Working Group meetings   | N/A    | 5                | Internal consultation           |
| No. of due diligence checks                   | 11,078 | 9,923            | Due diligence                   |
| No. of supplier due diligence checks          | 6,660  | 5,498            | Due diligence                   |
| No. of helpline languages available           | 1      | 7 <sup>2</sup>   | Grievance and remediation       |
| No. of reports confirmed as modern slavery    | 1      | 0                | Grievance and remediation       |
| No. of helpline reports (total)               | 180    | 200              | Grievance and remediation       |

<sup>1</sup> % completion excludes our people located in our JESA and NANA Worley joint ventures as alternative Code of Conduct training is available.

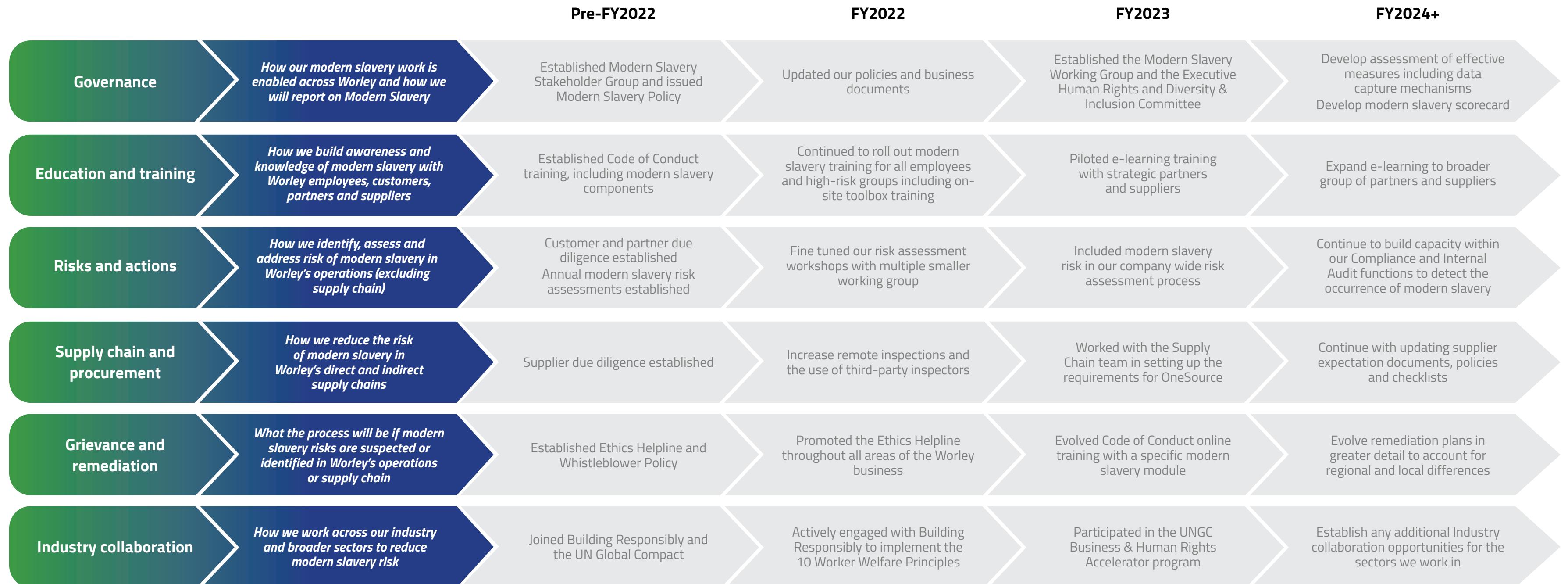
<sup>2</sup> Number of languages available for online intake form, translation available upon request for telephone.



## Assessing effectiveness Continued

### Our roadmap

In our FY2022 Modern Slavery Statement, we presented our roadmap for improving our performance in responding to modern slavery risk. Our progress against our roadmap is presented below.



# Appendix 1

## Overview of reporting entities

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

### AUS

Worley Limited (ACN 096 090 158)  
Worley Services Pty Ltd (ACN 001 279 812)  
Worley Power Services Pty Ltd (ACN 112 723 181)  
Worley Engineering Pty Limited (ACN 008 876 284)  
Worley Financial Services Pty Limited (ACN 099 425 831)  
Advisian Pty Ltd (ACN 098 008 818)  
Intecsea Pty Ltd (ACN 008 961 260)  
Energy Resourcing Australia Pty Ltd (ACN 076 232 605)

### UK

Worley Europe Limited  
Worley Group UK Limited  
Worley Field Services Limited  
Energy Resourcing Limited  
Worley Services UK Limited



## Appendix 2

# Summary of this statement against the Australian & UK regulatory requirements

| Australian statement requirements   | UK statement requirements   | Where in this document  |
|---|---|---|
| Identify the reporting entities   |   | <a href="#">Appendix 1 – Overview of reporting entities</a>   |
| Describe the reporting entity's structure, operations, and supply chains  | Organization's structure, its business, and its supply chains   | <a href="#">Worley Purpose, Ambition and Values</a><br><a href="#">Our operations</a><br><a href="#">Our brand</a><br><a href="#">Our locations</a><br><a href="#">Our organization structure</a><br><a href="#">Our people</a><br><a href="#">Our supply chain</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                                       | Its risk of slavery and human trafficking taking place in its business and supply chain   | <a href="#">Our risk</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          | Its steps taken to assess and manage slavery and human trafficking risk<br>Its due diligence processes in relation to slavery and human trafficking in its business and supply chains<br>Its training and capacity building about slavery and human trafficking available to staff<br>Its steps taken in relation to its subsidiaries if the activities of the subsidiary in fact form part of the supply chain or business of the parent | <a href="#">Our approach and actions</a><br><a href="#">Due diligence</a><br><a href="#">Grievance and remediation</a>  |
| Describe how the reporting entity assesses the effectiveness of these actions   | Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate   | <a href="#">Assessing effectiveness</a>   |
| 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) | Year-on-year improvements outlining practical progress  | <a href="#">Engagement and consultation</a>   |
|   | Transparent disclosure of any identified modern slavery risks   | <a href="#">Our risks</a>   |