

Whistleblowing policy

Introduction

This policy is to be read in conjunction with Turner & Townsend's ethics policy & code of conduct and other related policies, including anti-bribery & corruption (ABC), conflicts of interest (CoI) and gifts and hospitality. Definitions of key terms used in this policy are given in the ethics policy & code of conduct.

Turner & Townsend is committed to the highest standards of openness, probity, integrity and accountability. It seeks to conduct its affairs in a responsible manner taking into account the requirements of law, professional and regulatory bodies and the standards required from a socially responsible business and employer. We think that ensuring our People can raise genuine concerns is fundamental to creating an open culture at Turner & Townsend. It is clearly in all our interests to ensure that any wrongdoing is brought to light.

During the course of your employment with Turner & Townsend, you will be party to information which is confidential in nature. It is a fundamental term of your employment that you will not disclose confidential information about our affairs. However, this does not prevent you from raising concerns outlined in this policy through appropriate channels.

The purpose of this policy is to ensure that concerns about Turner & Townsends's activities are handled fairly and without fear of retaliation for those raising concerns, with the confidence that a review will be conducted.

This policy does not form part of any contract of employment and Turner & Townsend may amend it at any time. The Risk, Assurance & ABC committee is responsible for the oversight and review of this policy.

Application

This policy applies to all our People. Specific variances are dealt with as addendums to this policy.

This policy also applies in instances where more than one person raises a concern about the same issue.

You may raise concerns relating to suspected wrongdoing anywhere in the world, and this policy is not restricted to matters purely arising in the country where you work.

Depending on the nature of the concerns raised, it may be more appropriate for it to be dealt with under one of Turner & Townsend's other internal procedures. For example, a complaint or concern in relation to any internal procedure or action which directly affects a person's employment (such as contractual terms or work) or your own personal circumstances, such as the way you have been treated at work, should be dealt with through the grievance procedure.

Examples of concerns which should be raised under this policy

This section provides examples of potential wrongdoing which you may raise under this policy.

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You can use this policy to raise concerns where you have a reasonable belief that there is potential misconduct or impropriety. This may include but is not limited to conduct which tends to show that one or more of the following has been, is being or is likely to be committed:

- a criminal offence;
- a failure to comply with any legal obligation;
- a miscarriage of justice;
- putting health or safety of any individual in danger;
- damage the environment;
- conduct likely to damage our reputation or financial wellbeing;
- unauthorised disclosure of confidential information; or
- deliberate concealment of any of the above.

Disclosable matters include conduct that may not involve a contravention of a particular law. Information that indicates a significant risk to public safety or the stability of, or confidence in, the financial system is also a disclosable matter, even if it does not involve a breach of a particular law.

Disclosable concerns usually relate to the conduct of our People, but they may sometimes relate to the actions of a third party, such as a client, supplier or service provider. We encourage you to report such concerns internally first. You should contact your Cost Centre Director and the appropriate Regional MD or one of the other individuals set out in paragraphs 2 and 3 below for guidance.

Procedure

How to raise a concern

- 1 You should first raise the issue with your Cost Centre Director and the appropriate Regional MD. They will discuss your concerns with you and may request you set these out in writing, together with any evidence.
- 2 Your Regional MD will then raise the matter with Turner & Townsend's COO. If the concern involves your Cost Centre Director or the Regional Managing Director, or for any reason you would prefer them not to be told, you may raise the matter directly with any member of Turner & Townsend's Executive committee or the Risk, Assurance & ABC committee. Further details can be found on our intranet site, T2.
- 3 Whilst we would hope that you will feel able to raise a concern about any relevant disclosable matter with the person(s) referred to in 1 or 2 above, if any of those routes are not suitable, you may also raise a concern with Safecall, Turner & Townsend's external whistleblowing hotline provider. The contact details for Safecall can be found on T2. Safecall is authorised to receive information about disclosable matters under this policy.
- 4 Details of the matter and the relevant persons, including the discloser, should be kept confidential and not disclosed externally until all internal routes have been exhausted.

Initial assessment

- 5 The first step will be to assess the concerns raised and to determine whether they fall within this policy (or any other Turner & Townsend policy) and to commence an appropriate investigation.

Fact finding

- 6 As the person raising the concern, you may be invited to a meeting to discuss the concerns.

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- 7 If your concern is raised through the whistleblowing hotline, then Safecall will obtain appropriate details from you which will then be forwarded to the Global RM Director for review with the COO.

Potential investigation & other enquiry method

- 8 The COO or their nominee may conduct an investigation with the objective of establishing whether wrongdoing has occurred. The format of the investigation may vary depending upon the circumstances. It will not always be appropriate or reasonably practicable to conduct an investigation. Turner & Townsend may adopt a different enquiry method to suit the relevant circumstances.

Findings & conclusions

- 9 The findings of the investigation or other enquiries will be communicated to the Risk, Assurance & ABC committee who will agree what further actions need to be taken. You may be advised of the outcome of the investigation where this is feasible, appropriate and permitted by law. If you are advised of an outcome, you may receive a summary of the outcome rather than any full findings. You must treat any information about the investigation as strictly confidential. It should be noted that individuals who choose to remain anonymous will not ordinarily be able to receive feedback.
- 10 While we encourage openness and reporting, please be aware that depending on the nature of the concerns raised, Turner & Townsend may not always be able to confirm the outcome of any investigation into a reported concern (for example due to legal constraints and obligations).
- 11 If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in paragraph 2.

Protecting your identity & anonymity

- 12 Where possible, your identity in raising a concern will be disclosed on a need to know basis. There may be circumstances, however, in which we may be required to reveal your identity, for example, where required by local law. If this is the case, we will take all reasonable steps to ensure that you suffer no detriment.
- 13 All anonymous allegations will be passed to Turner & Townsend's COO for consideration. You may choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised. You may refuse to answer questions if you feel this could reveal your identity at any time, including during follow-up conversations. However, if you choose to remain anonymous, Turner & Townsend encourages you to maintain ongoing communication with us.

Retaliation

Turner & Townsend will not tolerate any form of retaliation, harassment, intimidation, victimisation, unfair discrimination, or other detrimental treatment against any of our People who raise a concern in accordance with this policy or who assist in an investigation. Retaliation against a person who raises a concern under this policy can be expected to lead to disciplinary action, including, in appropriate cases, dismissal. If you raise a concern in accordance with this policy, you will be taken seriously and will be treated fairly and justly by Turner & Townsend.

You will be protected by the relevant statutory protections in relation to any concern raised by you in accordance with this procedure only where you reasonably believe that the disclosure is made in the public interest and you have acted in good faith. In particular, in those circumstances, you have the right not to be subjected to any detriment by any act, or any deliberate failure to act by Turner & Townsend on the grounds that you have raised a concern in accordance with this policy. If you believe that you have been disadvantaged or treated unfairly in retaliation for raising a concern under this policy you should report this as appropriate through one of the channels set out in paragraphs 1-3 above.

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Disciplinary action may be taken against anyone deliberately raising false, vexatious or malicious allegations, and such action could result in disciplinary action/termination of employment and/or legal action.

A handwritten signature in black ink that reads "Vincent Clancy". The signature is written in a cursive, flowing style.

Vincent Clancy
Chief Executive Officer
04 October 2022