

1.1 Introduction

Turner & Townsend is an independent professional services company specialising in programme management, project management, cost management and consulting across the real estate, infrastructure and natural resources sectors. We operate in 119 offices worldwide. Our Purpose of transforming performance for a green, inclusive and productive world underpins the way we do business and the work we undertake. Further information about Turner & Townsend's structure, functions and the markets within which we operate can be found at <http://www.turnerandtowntsend.com>.

1.2 Purpose

The purpose of this policy is to outline Turner & Townsend's commitment to the elimination of modern slavery and our approach to comply with our obligations under the Modern Slavery Act 2015 ("the Act"). Turner & Townsend adopts a robust approach to slavery and human trafficking, and we take a zero-tolerance approach to non-compliance with the Act within our company and its supply chain. This policy applies to all Turner & Townsend's businesses operating within the UK and their associated supply chain. It is reviewed and amended for good practice, as appropriate. Our financial year runs from May to April. This statement has been published in November 2022 and outlines our planned activity for financial year 2022 - 2023.

1.3 Our policy

Turner & Townsend are committed to our business and supply chains being free of any practices of modern slavery and human trafficking. It is our expectation that our employees and our supply chain will respect this commitment and comply with relevant legislation. We are a business that upholds integrity and transparency in all our business dealings and our modern slavery prevention measures are no exception. Our policy and processes and any changes to them are communicated to those affected. We are committed to investigating any complaints about suspected human trafficking activity in relation to our business and will take prompt remedial action, where necessary.

1.4 Organisational structure & supply chains

Turner & Townsend Limited is the UK parent company of the Turner & Townsend group of companies. We have nearly 8,481 employees worldwide and operate in 49 countries. We operate in the UK, the Americas, Europe, Africa, the Middle East, Asia, Australia and New Zealand. Our head office is in Leeds, UK. Our global supply chain is comprised of contractors, service providers, and manufacturers of a variety of electrical and other products used in professional services.

On 1 November 2021, we formed a strategic partnership with CBRE Group, Inc, the world leading commercial real estate services and investment firm listed on the New York Stock Exchange. As part of this transaction, CBRE acquired an interest in 60% of the share capital of our group holding company, Turner & Townsend Holdings Limited. We will remain operationally independent under this new legal structure. There will be no change to our clients; in the way we operate, our commitment to service excellence, or the personal care we demonstrate.

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1.4.1 Supply chains

It is our expectation that our suppliers:

- Comply with the provisions of the Act;
- Adhere to our commitment to a zero-tolerance approach when it comes to any form of slavery or human trafficking;
- Take steps to prevent modern slavery within their business and supply chains;
- Pay the national living wage for UK-based employees; and
- For non-UK based locations, the wages of their employees meet applicable local standards.

Our financial teams record the suppliers we engage. In addition, a list of potential suppliers, who can support our service delivery, if required by our clients, is available on a supplier database maintained by our operational teams. These suppliers are required to submit information covering a wide range of topics relevant to management systems, internal policies, diversity etc.

Our direct employment model means that we are largely able to conduct our own checks and that any areas of concern in the supply chain can be identified and audited.

1.5 Policies in relation to slavery and human trafficking

Our commitment that there is no modern slavery or human trafficking within our business or supply chain is underpinned by the following policies:

- Ethics and code of conduct policy
- Anti-Bribery & Corruption policy
- Grievance procedure
- Whistleblowing policy

Our Purpose guides our corporate responsibility strategy, which includes integrity in industry and community value. We aligned to the United Nations Sustainable Development goals; a voluntary initiative based on CEO commitments to implement universal sustainability principles.

In 2022, we launched our global commitment to inclusion and associated regional route-maps which are tailored to local need. The commitment and route-maps place inclusion at the heart of the way we manage our people, support our communities and lead our industry. Addressing Modern Slavery is a fundamental part of our commitment, particularly when it comes to setting new standards for our industry.

1.6 Risk assessment and management

Our services are generally delivered by our global workforce and as would be expected of a professional service organisation, our supply chain is relatively limited. On this basis, the risk of modern slavery and human trafficking within our recruitment, employment and associated supply chain is considered minor. We further mitigate this risk through the processes as described above.

As part of our commitment to reduce the risk of slavery and human trafficking we have carried out a risk assessment of our business and supply chains as follows:

- Country Risk: Low to High. Although we are based in the UK, we operate all over the world, including the Middle East & Asia. Our direct employment model means that the risks of slavery or trafficking are low.

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- Sector Risk: The professional services industry in which we operate in is considered low risk.
- Transaction Risk: As we directly employ our workforce the transaction risks are low.

Our direct employment model provides control over the work undertaken and labour conditions under which our workforce operates.

1.7 Due Diligence

We have robust recruitment practices, including 'right to work' checks for all prospective employees and maintain a preferred supplier list of agencies that may source candidates on our behalf. This provides an assured overview of those entering our employment and minimises the occurrence of forced or involuntary labour. We have human resources representatives working with senior management so that:

- Recruitment practices are fair and equitable and in accordance with the relevant employment laws;
- Company standards, values, corporate behaviours and policies are being adhered to and satisfy working conditions;
- Relevant safeguards are in place; and
- Appropriate training is provided.

1.8 Workforce Training

Where relevant, we have/provide our staff with enhanced training when appointing contractors in higher-risk locations.

Further training will be given to staff as identified below.

1.9 Further steps

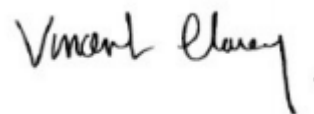
During the next annual year 2023, we have identified the following activities to progress our commitment to the Act, we shall:

- Prepare to become a Living Wage Employer in our largest business, UK; as a key action of our inclusion route-map,
- Integrate inclusion, and human rights, including Modern Slavery, into our supplier selection standards; as a key action of our global commitment to inclusion.
- Work with our significant suppliers to ensure that they are complying with the Act;
- Review our complaints and escalation procedures in respect of slavery and human trafficking in our supply chain and wider business, and publish this in future policy statements;
- Review our standard terms and conditions for the appointment of UK based contractors and subcontractors and include conditions covering our slavery and human trafficking supplier commitment;

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This statement applies to Turner & Townsend Limited and its UK subsidiary companies. It has been approved by the Board of Directors.

A handwritten signature in black ink, reading "Vincent Clancy".

Vincent Clancy

Chairman & Chief Executive Officer 29 November 2022