

# Modern Slavery Statement 2021

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

# Contents

<a href="#">About this statement</a>	3
<a href="#">Who we are</a>	4
<a href="#">Achievements since our last statement</a>	13
<a href="#">Our focus for the next 12 months</a>	21
<a href="#">Consultation and engagement</a>	22
<a href="#">Summary of this statement against the requirements</a>	23

# About this statement

This statement reports actions we've taken during the last financial year (1 July 2020 to 30 June 2021) to address modern slavery risks associated with our business and our plans to improve the program over the next 12 months (1 July 2021 to 30 June 2022). We have reissued our 2021 statement following feedback on our 2020 statement. We take modern slavery and human rights abuses very seriously and are committed to continuously improving our modern slavery prevention program.

As we operate globally, this statement also addresses our obligations under the *UK Modern Slavery Act 2015* and the *Australian Modern Slavery Act 2018* (Cth). It was developed in consultation with our modern slavery stakeholder community, and then reviewed and approved by the Worley Board of Directors.

**Chris Ashton**

Chief Executive Officer

December 2021

# Who we are

We're a leading global provider of professional project and asset services in the energy, chemicals and resources sectors. Our purpose is delivering a more sustainable world. We use our knowledge and capabilities to support our customers to reduce their emissions and move towards a low-carbon future.

Worley Limited is publicly listed on the Australian Securities Exchange and is headquartered in Sydney, Australia. Worley Limited is the ultimate parent company of the Worley Group entities which we collectively refer to as "Worley" in this statement.

In June 2021, we employed 47,702 people in 52 countries, with 16% of these being contingent labor and the rest directly employed by Worley.

The majority of our people are office based professionals. Craft workers, who are those primarily based in the field, make up around a third of our total workforce. Of our total workforce, 5% are craft contingent labor workers, 24% are directly employed craft workers.

Countries where we have the highest number of people are: United States, Canada and India.

We own several manufacturing sites based in North America and Europe. These sites are seen as lower risk due to their location risk profile for modern slavery and mature management standards.

Since our last statement, we have restructured from a line of business structure to a regional model. We now manage operations primarily in two regions, the Americas as one region and Europe, Middle East and Africa (EMEA) & Asia Pacific (APAC) as the other region.

Our modern slavery prevention program and Ethics Helpline are managed by our compliance team. The compliance team sits within the legal team. We continue to report to the Board every six months on modern slavery.

The compliance team works closely with a large group of stakeholders when developing and implementing the modern slavery prevention program.

These stakeholders represent the following functions; assurance, construction management, corporate affairs, corporate secretary, diversity and inclusion, engineering, human resources (HR), legal, supply chain management, project delivery, quality and recruitment.

More details on how our subsidiaries are represented in our stakeholder group can be found in [Consultation and engagement](#).



# Reporting entity identification

Our joint statement covers all of the wholly owned entities within the Worley Group is issued by Worley Limited (ACN 096 090 158) of Level 17, 141 Walker Street, NORTH SYDNEY, NSW 2060, Australia. Worley's financial year starts on 1 July and ends on 30 June of the next year.

In accordance with the *Australian Modern Slavery Act 2018 (Cth)*, the following Worley Group entities meet the reporting threshold:

- Worley Services Pty Ltd (ACN 001 279 812) - an operating technical services entity
- Worley Engineering Pty Limited (ACN 008 876 284) - an asset holding entity
- Worley Financial Services Pty Limited (ACN 099 425 831) - a corporate financing entity
- Advisian Pty Ltd (ACN 098 008 818) - an operating consulting services entity
- Intecsea Pty Ltd (ACN 008 961 260) - an operating technical services entity
- Energy Resourcing Australia Pty Ltd (ACN 076 232 605) - an operating recruitment and contractor management services entity

In accordance with the *UK Modern Slavery Act 2015*, the following Worley Group entities meet the reporting threshold:

- Worley Europe Ltd - an operating technical services entity
- Worley Group UK Limited - an operating technical services entity
- Worley Services UK Limited - an operating technical services entity
- Energy Resourcing Europe Ltd - an operating recruitment and contractor management services entity

Information in this statement applies to all reporting entities and wholly owned entities unless otherwise stated.



Specialists service brands

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Specialists sub brands

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Energy Resourcing



# Our values

## We value Life

We believe in the safety, health and well-being of our people, communities and the environment. Without it, nothing else matters. We care. We recognize things don't always go right so we face into important issues with care and respect. We know blame fixes nothing and that how we respond and learn really matters. We do the right thing.



## We are Stronger together

We thrive in real relationships and partnerships. We nurture networks and collaboration. We recognize our differences make us stronger. We have each other's back. We mobilize in smart and ever-changing combinations. We thrive in real long-lasting relationships and partnerships.



## We Rise to the challenge

We love a challenge. We go the extra mile delivering new and better solutions to complex problems. Our can-do attitude makes us reliable, accountable and trustworthy. We're agile, innovative and attentive; focused on being efficient and productive. We get things done.



## 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 commitment

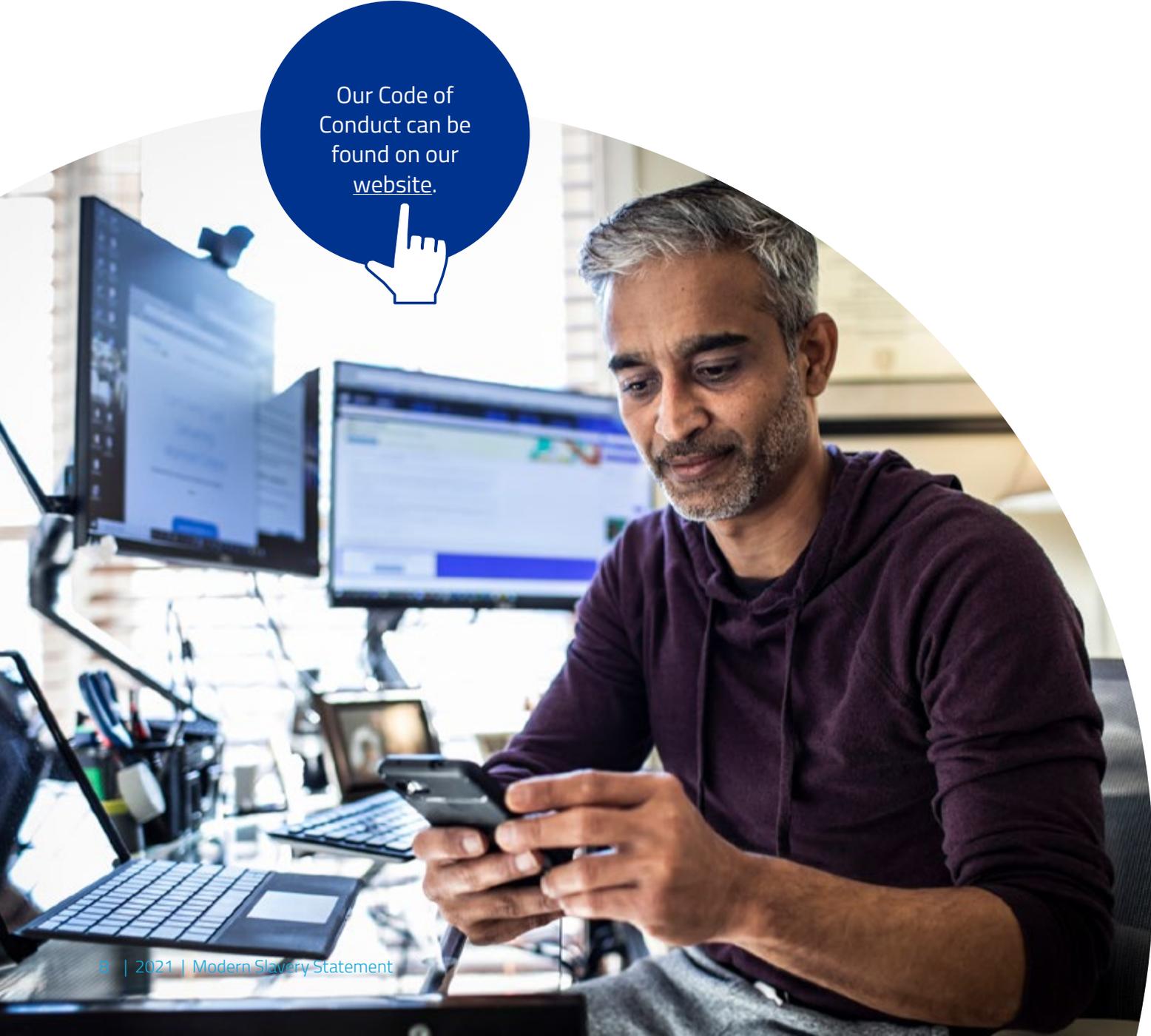
We respect the fundamental human rights of the people we deal with and won't take part in activities that encourage human rights abuses.

Our commitment to the highest standards of business ethics is at the heart of taking responsibility and delivering a more sustainable world. This is included in our Code of Conduct, showing that we're committed to making a positive impact in the communities in which we work.

## Definition of modern slavery

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.

Our Code of Conduct can be found on our [website](#).



## What we expect of our people

- We will assess and monitor our suppliers appropriately to make sure they meet our Supply Chain Code of Conduct expectations.
- We will make sure our customers meet our Responsible Business Assessment Standard.
- We will conduct due diligence and monitor our agents and joint venture partners to make sure they meet our expectations.
- We will report any worries or breaches via our Ethics Helpline.
- We will follow our policies and procedures.

## What we expect of our suppliers and partners

- Meet the requirements of our Supply Chain Code of Conduct.
- Act in a socially responsible way, including not using forced labor, bonded labor, debt bondage, domestic servitude, forced child labor, sex trafficking and human trafficking.
- Put in place controls to prevent modern slavery in their supply chains.

## How we'll communicate our expectations

- Annual training and education campaigns are available to all our people.
- Leaders and supervisors are responsible for making sure our people are aware of our commitments and we meet or exceed the standards we've set.

## Measuring our performance

Our existing and new commitments are outlined in this statement in the sections [Delivering commitments from our last statement](#) and [Our focus for the next 12 months](#).

We monitor our performance against this statement. Our people, suppliers, partners and those who represent us are all responsible for making sure we carry out our commitments.



# Modern slavery risks

## In our industry

We typically work and have suppliers in the construction, mining, manufacturing and refining sectors. These sectors typically employ foreign workers, temporary and seasonal labor. Short term contracts and outsourcing are common.

Other indicators in these sectors are recruitment fees, hazardous nature of the work, excessive overtime to meet deadlines and on-site accommodation sometimes being required.

Within our people, business partners and supply chain, there are groups exposed to more risks including migrants, refugees and foreign workers.

All of these demonstrate a high risk of modern slavery, including forced labor, debt bondage and deceptive recruitment practices.

## We may cause

As a global organization, we know that we're exposed to a variety of modern slavery and human rights risks.

We operate in countries that have higher rates of modern slavery and human rights abuses. We perform an assessment for each country where we have a presence. This assessment takes into account the modern slavery rates (Global Slavery Index), corruption rating (Corruption Perception Index), and government response (Global Slavery Index) for that country. We have identified our high-risk countries which feeds into our risk prioritization process. High risk countries where we have people are highlighted on the map on page 11. The table on page 11 shows the global distribution and number of our craft workers in June 2021.

Our business primarily provides engineering services to our customers and most of our people are in permanent office based positions. There are still risks associated with office positions for example, forced overtime and harassment, but we do not consider it to be high risk for modern slavery.

Our craft workers are concentrated in Europe and the North America regions. Although we consider the risk to our direct employees as low, there is still risk that we could directly or indirectly cause substandard working conditions for our people.

For example, 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 there would be an increased modern slavery risk as it places them in a more vulnerable position.

Some of our people are contingent workers, which means they are not directly employed by Worley. They only make up around 16% of our workforce but they may be more vulnerable to exploitation. This includes recruitment fees, bonded labor and having their documents withheld.

## We may contribute to

We may contribute to modern slavery risks by using procurement practices that pressure suppliers i.e., selecting lowest cost suppliers or compressed delivery timelines.

We may also contribute to modern slavery by not training our workers who have relocated to foreign places about domestic or other services that engage people who are vulnerable or at high risk of being exploited.

# We may be connected to modern slavery through our business relationships

We believe our risk of modern slavery mostly comes from entities related to us, in our partners and supply chains. Supply chains in our industry sectors, particularly of goods, are long and can involve sub-suppliers, often based in different countries.

In particular our project delivery supply chain makes up the majority of our direct procurement. Our customers often provide a list of pre-approved suppliers or make the final selection.

Project supply chains can also be complex and dynamic due to:

- The availability of suppliers where our projects are based.
- Our commitment to the development of local businesses in the places where we work.
- Our use of a variety of recruitment providers.

We also work with suppliers outside of our own industry sectors purchasing services that are at a higher risk, including:

- Garments for safety and personal protective equipment.
- Electronics and IT equipment used by Worley.
- Shipping, logistics and transportation of supplies and equipment.
- Logistics planning and transportation of Worley people.
- Catering, cleaning, building maintenance, and waste disposal used in our offices and field sites.

We recognize we have a part to play in monitoring and influencing change with our partners and supply chain to minimize the risk of modern slavery related to us.

## High risk countries where we employ our people (June 2021)



## Number of our operations craft workers employed by region (June 2021)

Americas Total	9299	APAC Total	1023	EMEA Total	3599
North America Field Services	8958	Asia	489	Europe, Middle East, Africa	766
Americas Central	77	Australia & New Zealand	534	UK, Norway, Central Asia and Eastern Europe	2833
Latin America	120				
North America East	130				
North America West & Gulf Coast	14				

*In June 2021, there were only 4 craft workers that reported through corporate functions rather than operations and so are not included in the tables above. These craft workers are employed in the UAE (1 worker), Australia (2 workers) and the US (1 worker).*

# Raising concerns

In line with the UN Guiding Principles and our [Whistleblower Policy](#), we have a 24-hour, seven days a week, [Ethics Helpline](#) with translation services available.

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

The helpline is operated by an independent third-party provider. Reports can be made anonymously. Reports can be made both from within and outside the company.

We promote our Ethics Helpline across our offices and field sites as our primary grievance mechanism.

If one of our people reports an incident to their local Human Resources (HR) group instead of the Ethics Helpline, the HR team will enter the report on their behalf directly into the Ethics Helpline where the report is investigated and monitored. This ensures consistency across our business.

In cases where we receive reports of modern slavery, we have a robust process in place that ensures all reports are reviewed by our trained investigators and monitored by our compliance team.

We have a mature ethics reporting and whistleblower procedure that provides a consistent approach to investigations, review of close out with stakeholders and tracking of corrective or remedial actions through to completion.

Our trained investigation community undergo regular training, have standardized resources and are supported by the compliance team when necessary.

Helpline data trends are monitored and used to prioritize our planning and actions going forward.

We use real Ethics Helpline cases in our lessons learned programs to illustrate the effectiveness of reporting breaches of the Code of Conduct and modern slavery concerns without disclosing identifying details.

## Case study

We received a report through the Ethics Helpline about one of Worley's IT equipment suppliers. It raised concerns around media allegations of forced child labor used to mine elements connected with their products.

The supplier was able to give a satisfactory response in relation to these allegations. We also instructed our supply chain team that the Supply Chain Code of Conduct must be referenced and accepted in supplier terms and conditions.



# Achievements since our last statement

## Policies and governance

**Modern Slavery** - Since our last statement, we have strengthened our policies and procedures with the addition of a Modern Slavery Policy and Modern Slavery Procedure. This sets out our annual cycle of risk assessment, statement production and action.

Our third-party due diligence procedure was updated to include a risk-based approach. Our Management System was updated to include a specific section on modern slavery.

**Code of Conduct** - We are currently refreshing our Code of Conduct which will include a greater emphasis on modern slavery. The updated Code will be rolled out via a detailed training program over the next 12 months. The Code will be translated into multiple languages to make it more accessible for our people.

**Our people** - We directly employ people and take on temporary employees and contractors. To make sure of fair recruitment and employment practices, we follow employment policies and procedures which include, but are not limited to: Global Diversity and Inclusion, Bullying and Harassment Standard and Equal Opportunities Procedures.

The Health, Safety and Environment Policy and Camp Accommodation Facilities Standard set out minimum health and safety requirements for field sites and on site accommodation. We also have a Human Rights Policy in which we commit to align with the United Nations' Human Rights Council's Guiding Principles on Business and Human Rights: 'Protect, Respect and Remedy' Framework.

Current policies and procedures are being benchmarked to identify gaps.

**Sustainability** - We released our Sustainability Procedure to include reference to our modern slavery commitment.

**Supply chains** - Our project procurement and contracting teams follow the guidance in our policies and standards for supply chain

management and contracts. Our pre-qualification process can include visits to suppliers' facilities. Our suppliers must follow our Supply Chain Code of Conduct which sets out minimum requirements.

In the last 12 months we've done a detailed review of our Supply Chain Code of Conduct. Standard terms and conditions have been updated to make sure that all our suppliers are expected to meet our expectations. We expect that:

- They must work to the law and to internationally recognized standards and appropriate codes of practice.
- They must work to put in place socially responsible supply chain, anti-bribery and anti-corruption practices.
- They must not use any form of child or forced labor and providing fair pay and working conditions.

The new Supply Chain Code of Conduct extends our leverage with terms that allows us to audit our suppliers and terminate business relationships where the supplier cannot meet the minimum expectations.

We understand some of our suppliers and contractors don't have mature policies and procedures. This doesn't exclude them from doing business with us. We're committed to supporting the development of local businesses so they understand and take action to prevent modern slavery.

This year we developed a simple resource pack for suppliers and contractors.

All of our policies are available to our people on our intranet. The policy database can be searched using key words and topics. We promote the Code of Conduct during our annual Code of Conduct training. Our Supply Chain Code of Conduct is available on Worley's [external website](#).

# Reporting and investigation

This year we updated our Ethics Reporting and Whistleblower procedures to strengthen how we closed out reports.

In the last year a small number of Ethics Helpline cases referenced potential modern slavery concerns. Each of these were investigated as per our internal process and no evidence of modern slavery was substantiated.

# COVID-19 response

During the COVID-19 pandemic, we worked to protect our people, keep up our financial and operational standards, and support our customers and communities. For our office-based people, as well as our supplier's employees, the recommendation was and is to work from home and minimize exposure.

To control the risks for our people in the field, we have reduced time spent on site by working remotely. This includes relying more on remote inspections during travel and workplace restrictions to carry out supplier quality inspections, which are critical to ensuring our suppliers meet our standards. We created a new global Remote Virtual Inspection Procedure to ensure a consistent approach across our businesses.

Over the course of the pandemic our supply chain team have worked tirelessly to meet the needs of our customers, protect our suppliers and their people while ensuring our high levels of safety and quality. In the UK the supply chain team worked to minimize the impact on clients and suppliers by:

- Relying more on remote inspections in the region.
- Working with our customers, tier one suppliers, internal subject matter experts and industry bodies to align approaches.
- Offering our experienced in-house logistic services to resolve supply issues.
- Working transparently with key suppliers and clients to give real priorities.



# Training

## Training and resources for all our people

Training and policy go hand in hand. In the last 12 months much of our training was about updates to our policies.

This year a modern slavery section was included in our annual Code of Conduct refresher training for office based personnel.

The Code of Conduct training refresher covered several topics; definitions of modern slavery, our areas of risk, where to find our policies and procedures, the importance of due diligence on partners and supply chain where to find further training on modern slavery and how to report concerns about modern slavery.

A toolbox training topic on modern slavery is currently being rolled out for our people working on site. In addition, we launched an intranet site with additional resources for modern slavery training which can be accessed at any time.

Training for field personnel covered the definition of modern slavery, our commitment to preventing modern slavery, a Q&A on potential modern slavery indicators and how to report via our Ethics Helpline.

## Activities for targeted groups

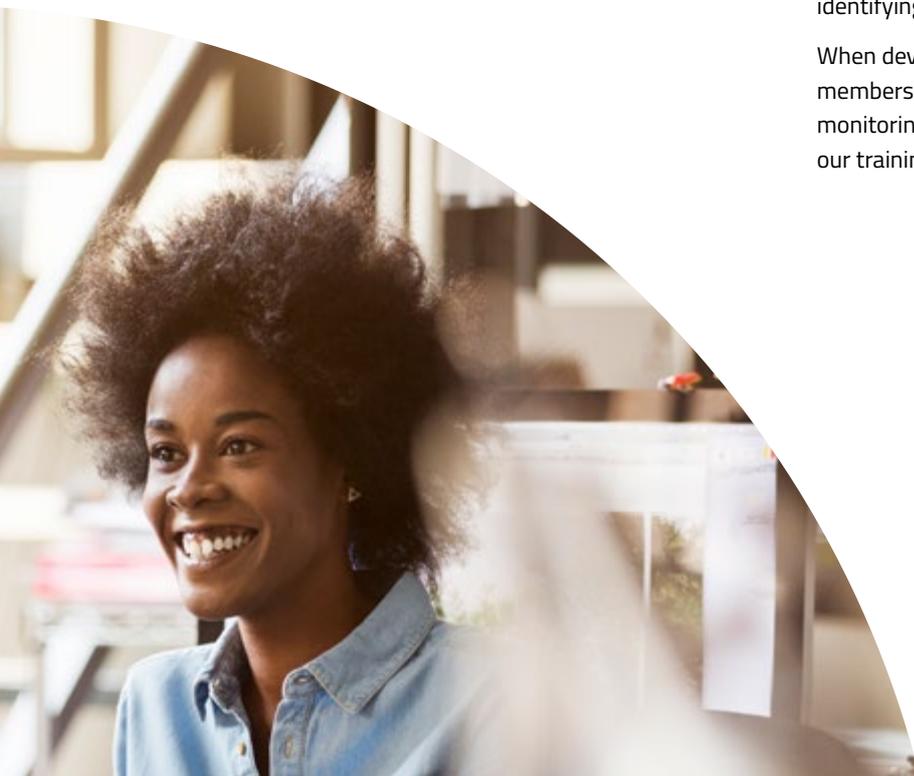
In addition to company-wide campaigns we assigned interactive online courses and ran “face to face” training for smaller groups of targeted positions. They included:

- Worley people who visit sites (package engineers, supplier quality inspectors, supply chain team members)
- Members of the modern slavery stakeholder group
- Members of the compliance champions network
- Members of the leadership team
- Members of the legal team
- Members of sales and operations team (as part of Responsible Business Assessment training)
- Helpline investigators (online training only)

Face-to-face training sessions included information on, definitions of modern slavery, our areas of risk, modern slavery indicators, our modern slavery initiatives and how to report via the Ethics Helpline.

Online training was provided by our third party due diligence research tool supplier and focused on trafficked labor. This included information on UK legislation, recognizing risk and identifying trafficked labor.

When developing our due diligence program, we trained 330 members of the supply chain team in the use of our due diligence monitoring tool so far. We also added corporate supply chain to our training program.



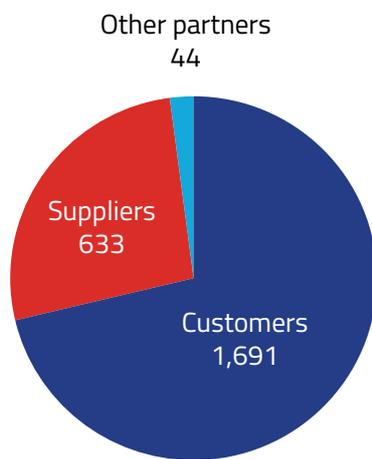
# Due diligence

We perform due diligence on all our business relationships. The level of due diligence depends on the type of relationship, and the risk level.

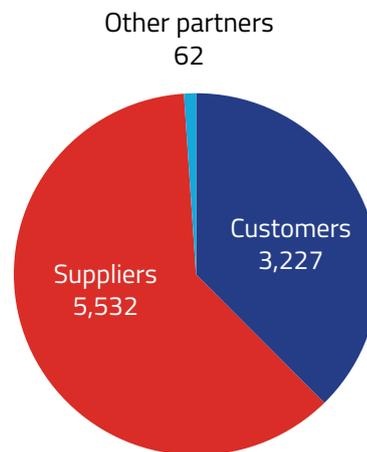
We have an internal team of due diligence analysts who support all areas of our program. They use third party research tools and external due diligence providers if additional expertise is needed.

Our specialist teams have done over 7,000 due diligence reviews in the last 12 months.

FY20 total (July 2019-June 2020)



FY21 total (July 2020-June 2021)



## Customer due diligence

Our customer due diligence process is part of our overall Responsible Business Assessment. This assessment looks at the potential trade sanctions, credit worthiness, ethical business practices, carbon emissions intensity and social license concerns. More details can be found in our [Sustainability Report 2021](#).

Over the last year we have fully integrated our customer due diligence into our internal sales system. This means we have centralized alerts when issues are seen, and clear communication between our sales and analyst 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 what mitigation is needed.

- Understand their modern slavery prevention / anti-bribery policies and training programs.
- Trigger due diligence for high and medium risk suppliers / contractors.

If suppliers and contractors aren't registered in our Requis tool, our supply chain team can give their details directly to the due diligence analyst team. This triggers a risk assessment for modern slavery and anti-bribery, which is followed by a due diligence analysis for high and medium risk suppliers and contractors. The risk assessment looks at several key areas; country risk, size of supplier and type of service or product being supplied.

Supplier due diligence includes desktop search of publicly available sources and ongoing automated screening against sanctions, debarments, etc.

## Supply chain due diligence

An ethical assessment is now part of our supplier registration tool, Requis. Using this tool our suppliers and contractors complete a series of questions to help us:

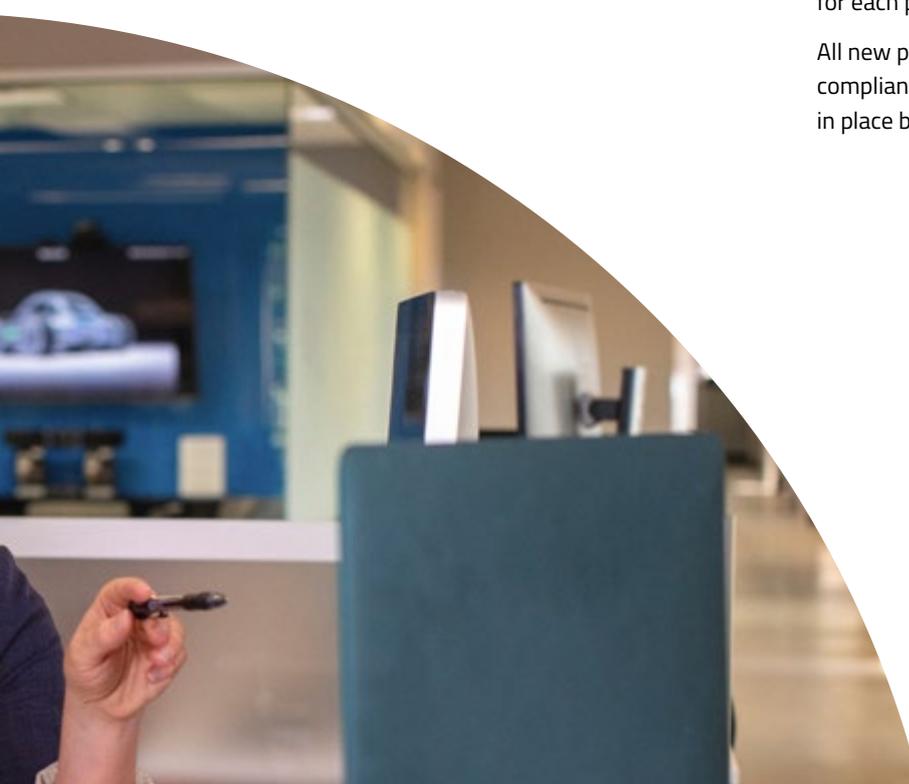
- Understand the level of risk of modern slavery, bribery and corruption based on country risk and type of service or product being supplied.

## Partners due diligence

We have detailed procedures for other relationships including agents, joint ventures and local sponsors.

Our approach includes completion of a questionnaire by our potential partner to understand their program. We then take a risk-based approach to work out 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.



# Delivering commitments from our last statement

In our last statement we set out goals we wanted to achieve. Below is a summary of the progress we made:

Risk area	FY21 initiative	Status
Customer due diligence	Customer Success Platform integration and customer ethics due diligence both completed in line with updated Responsible Business Assessment.	We successfully completed the initiative; more details can be found in the <a href="#">customer due diligence section</a> .
Supplier due diligence	Worley's risk assessment and due diligence process included in Requis supplier registration tool.	We successfully completed the initiative; more details can be found in the <a href="#">supplier due diligence section</a> .
Supplier expectations	Refresh our Supply Chain Code of Conduct to strengthen modern slavery requirements and align with Building Responsibly guidance.	Supply Chain Code of Conduct updated with new guidance on: <ul style="list-style-type: none"> <li>• Modern slavery</li> <li>• Conflict minerals</li> <li>• Counterfeit materials</li> </ul> More details can be found in the <a href="#">Policies and Governance section</a> on supply chain.
Supplier monitoring	Work with our global assurance team to include modern slavery in our existing audit processes.	We performed spot checks to create a baseline of compliance with the due diligence process.  We created training for those who visit sites on our behalf (our own people and external inspectors).
Supplier support	Develop toolbox of resources to support smaller suppliers in educating their employees and sub suppliers and promoting awareness of modern slavery.	We created a toolbox of resources to support suppliers in developing their own compliance program and meet the requirements of the Supply Chain Code of Conduct.
Recruitment	Form a working group with representatives from human resources to actively monitor and improve processes to manage modern slavery risks associated with recruitment and the use of recruitment providers.	Working group established and will continue to operate throughout the next year. Due diligence was completed on our recruitment providers.

# Assessing effectiveness

We are committed to improving our modern slavery prevention program and use several methods to assess its effectiveness. A detailed review of our modern slavery program was made by Worley’s internal audit team at the beginning of 2020 and a second audit has been scheduled for 2022.

Measuring our performance against our own standards and procedures is carried out by the assurance team. This year we worked with the assurance team to establish a baseline of compliance with our due diligence process. One of our priority activities for next year is to develop a program to assess the effectiveness of implementation of our initiatives.

Every year we perform a risk assessment with our group of stakeholders from across the company. In this assessment we prioritize our modern slavery risks and develop a plan and activities to mitigate these risks. Several of our priority activities for next year aim to enhance our modern slavery program. Including promoting our Ethics Helpline as a tool for reporting modern slavery, creating a monitoring program and reviewing our current project supplier registration tools.

We have key metrics with defined measurable criteria we will track over time. Between July 2020 and June 2021 we achieved:

**100%**  achievement of our 2020 annual initiatives

**40,000+**  
of our people trained in Code of Conduct / Modern slavery



**Three** ethics helpline cases referenced modern slavery, all were investigated and **0** were substantiated

**51** suppliers were identified as having red flags out of **5,532** suppliers



In our next statement we will report on the number of training sessions given to leadership and the number of supplier inspections and audits.

# Annual risk assessment

Under our new procedure for modern slavery we must review our risk profile every year. The review is carried out using a risk matrix and input from our group of stakeholders. This stakeholder group is made up of experts from across our corporate functions, technical departments and subsidiaries. For more details visit the [Who we are](#) and [Consultation and engagement](#) sections. Risks are prioritised based on their consequence and likelihood. Other factors that could make a risk worse or less critical were summarized by the risk trend, which looked at world events, new legislation and our own actions. Our modern slavery risk assessment was reviewed in early 2021. The review highlighted the following items as our highest risks. These items will be the focus of our commitments to action which are detailed in the next section.

Risk category	Description of the risk
Speaking up and reporting	Modern slavery could happen where we, one of our customers or partners are based. Our people might not recognize there is an issue or report it for investigation.
Travel restrictions (COVID-19)	Under the current travel restrictions, our ability to visit supplier premises and site operations to make sure our expectations are being met is limited. This impacts the level of direct monitoring or audit we can complete.
Our customers and partners	Customers and partners operating in countries where there is limited modern slavery government response may lack mature programs or understanding of the issues.
Our suppliers and contractors	We work with a large number of suppliers and contractors, each with their own level of maturity and commitment to modern slavery prevention.  We have an ongoing risk that our supply chain partners don't meet the minimum expectations of our Supply Chain Code of Conduct.
Our Modern Slavery Policies and Procedures	Our targeted oversight and monitoring programs must be able to show how our modern slavery program is performing.
Retain our social license to operate	We will be judged by our choices and have a responsibility to understand modern slavery risks.  We have an ongoing risk that our projects may not meet our modern slavery expectations.  Look for opportunities to work with industry groups to improve the industries we work in.

# Our focus for the next 12 months

The following table outlines the priority activities for the next year (1 July 2021 to 30 June 2022) based on the outcomes from our annual risk assessment. Our focus is to build on the progress and momentum we established over the last 12 months.

Area of risk	Focus for 1 July 2021 to 30 June 2022
Speaking up and reporting	Continue to provide modern slavery training across our business. Promote the use of our Ethics Helpline as the mechanism to report concerns.
Site inspections	Develop a project supplier inspection program for modern slavery and explore remote inspection options.
Our customers and partners	Promote our program and commitment when bidding on work and share our knowledge with customers. Work with our joint venture partners to adopt modern slavery prevention programs which align with ours.
Our suppliers and contractors	Review our current project supplier registration tools and seek opportunities to use them more broadly across our corporate supply chain functions.
Implementation of our Modern Slavery Policies and Procedures	Expand our work from last year and develop a more detailed, risk-based quality monitoring program to assess the level of implementation of our commitments.
Retain our social license to operate	Contribute an enhanced focus on modern slavery in our Responsible Business Assessment. Include modern slavery prevention themes in existing procedures and training for construction projects. Actively engage in Building Responsibly to implement the 10 Worker Welfare Principles.

# Consultation and engagement

## Internal consultation

As part of our modern slavery prevention program we looked at which of our businesses were different to the larger Worley Group in terms of risk, organization structure, supply chains and training.

In the case of Energy Resourcing (a recruitment and contractor management subsidiary), we had initially determined that it had slightly different supply chains and risks to the rest of the Worley Group. However, on reflection the differences were small, Worley also has recruitment and people management risks and Energy Resourcing follows Worley Group policies and procedures.

To reflect this a representative of Energy Resourcing was invited to join the modern slavery stakeholder group to ensure their specific risks were considered during our annual risk assessment.

The stakeholder group, the UK and Australian legal teams and the UK entity board members were all given the chance to comment on this statement during the drafting process.

This statement was presented to the Worley CEO, the Audit and Risk Committee and the Worley Board for comment and review.

## Partnering with industry groups

Worley is a signatory to the UN Global Compact (UNGC), which aligns our practices with the 10 universally accepted principles in the areas of human rights, labor standards, environment and anti corruption. Our commitments are aligned with the Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) Conventions which means we must make sure:

- Local laws are respected
- Employment is freely chosen
- Child labor is not used
- Illegal labor is not used
- Appropriate wages are paid

- Working hours are not excessive
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Discrimination is not practiced
- No harsh or inhumane treatment is allowed
- Businesses operate ethically
- Unauthorized sub-contracting isn't allowed
- Due regard is given to environmental impacts

We are an active member of Building Responsibly, a collection of engineering and construction companies that work together to promote and improve the rights and welfare of workers. As a member, we're committed to acting ethically and with integrity by supporting and adopting the 10 Worker Welfare Principles:

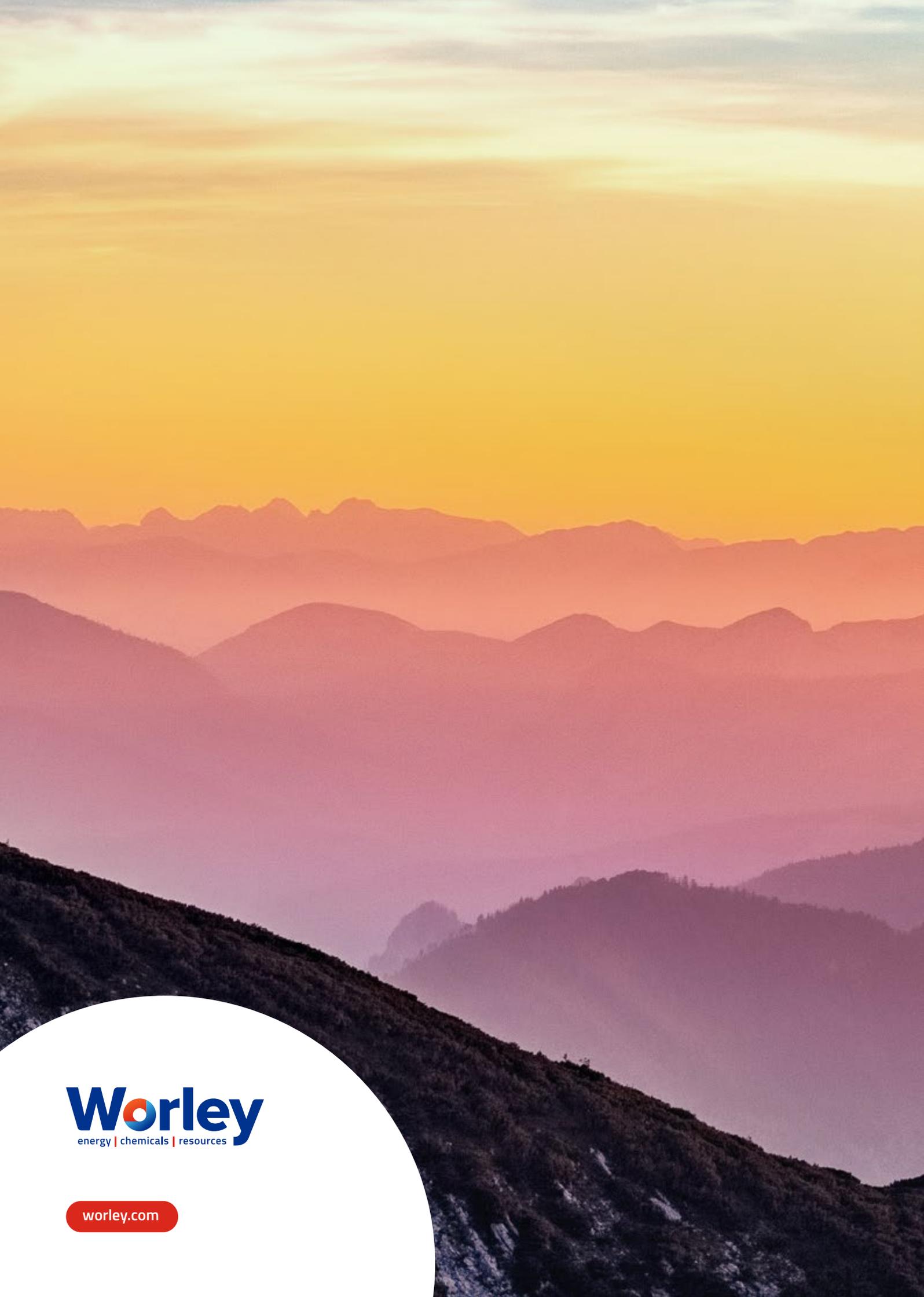
- Workers are treated with dignity, respect and fairness
- Workers are free from forced, trafficked and child labor
- Recruitment practices are ethical, legal, voluntary and free from discrimination
- Freedom to change employment is respected
- Working conditions are safe and healthy
- Living conditions are safe, clean and habitable
- Access to documentation and mobility is unrestricted
- Wage and benefit agreements are respected
- Worker representation is respected
- Grievance mechanisms and access to remedy are readily available

## External input

Next year we will consult an external third party on our human rights risk and modern slavery prevention program. During this consultation we will gain a deeper understanding of our human rights risks and independent guidance on how to further mature our modern slavery program.

# Summary of this statement against the requirements

UK statement requirements	Australian statement requirements	Where in the document
Clearly name the parent and subsidiary organizations it is covering	Identify the reporting entity(ies)	Reporting entity identification
Organization structure and supply chains	Describe the reporting entity's structure, operations and supply chains	Who we are
	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Who we are Modern slavery risks
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	Policies and governance
Due diligence processes		Due diligence
Training on modern slavery and trafficking		Training
Risk assessment and management		Modern slavery risks Annual risk assessment
Actions taken in response to modern slavery risks		Achievements since our last statement
Targeting these actions by prioritizing risks	Annual risk assessment	
Making year-on-year progress to address those risks	Our focus for the next 12 months	
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 organisations 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), and	Consultation and engagement
Transparent disclosure of any identified modern slavery risks		Raising concerns Policies and governance
	Provide any other relevant information	COVID-19 response



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