

# Modern Slavery Statement 2021

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

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# 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).

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).

This statement is approved by the Worley board of Directors and will be reviewed every year.

**Chris Ashton**

Chief Executive Officer

August 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.

We employ over 47,000 people in 54 countries. Countries where we have the highest number of employees 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.

Our modern slavery prevention program is managed by our compliance team who work with a large group of stakeholders. These stakeholders represent various departments including procurement, construction, and human resources.



# 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 Supply Chain 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 standards.
- We will conduct due diligence and monitor our agents and joint venture partners to make sure they meet our Code of Conduct 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 commitments are outlined in this statement which is updated each year.

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.

## Raising concerns

In line with our **Whistleblower Policy**, we have a 24-hour, 7 days a week, multi-language **Ethics Helpline**.

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

The helpline is operated by an independent third-party provider. Reports can be made anonymously. We have a robust process in place that ensures all reports are reviewed by our trained investigators and monitored by our compliance team. Helpline data trends are monitored and used to prioritize our planning and actions.

# Areas of risk

## Industry landscape

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

We typically work and have suppliers in the construction, mining and manufacturing sectors which are high risk for modern slavery, including forced labor, debt bondage and deceptive recruitment practices. We work with suppliers of services that are seen as high-risk including cleaning, accommodation, catering, wholesale and trade.

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

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 prioritisation process.

We believe the risk of modern slavery lies mostly with our partners and supply chains, rather than with the direct recruitment of our people. In addition, our project delivery supply chain can be complex and dynamic because of:

- the use of suppliers who have been prequalified by our customers to work on specific projects.
- the availability of suppliers where our projects are based.
- our commitment to the development of local businesses in the places where we work.
- many suppliers, particularly of goods, have long supply chains that can involve sub-suppliers, often based in different countries.
- our use of a variety of recruitment providers.

We recognize we have a part to play in monitoring and influencing change with our partners and supply chain.





## Commitments

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
- Unauthorised 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

## COVID-19 response

During the COVID-19 pandemic, we have worked to protect our employees, keep up our financial and operational standards, and support our customers and communities.

To control the risks for our field employees, we have reduced time spent on site by working remotely.

For office-based employees, including our supplier's employees, the recommendation was and is to stay home and minimize exposure.

# 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 practices, we follow employment policies and procedures which include, but are not limited to: Global Diversity and Inclusion, and Equal Opportunities Procedures. Current policies and procedures are being benchmarked to identify gaps.

**Sustainability** - Following the release of our new Purpose and Values, our Responsible Business Assessment will be refreshed early next year. In addition we released our Sustainability Procedure to include reference to our modern slavery commitment.

**Procurement** - Our project procurement and contracting teams follow the guidance in our policies and standards for procurement 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.

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.

**Reporting and Investigation** - All potential breaches of our Code of Conduct can be reported via our Ethics Helpline ([www.worleyethics.com](http://www.worleyethics.com)). 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.

# Training

## Training and resources for all our employees

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

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

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

## 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, quality inspectors, procurement 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)

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

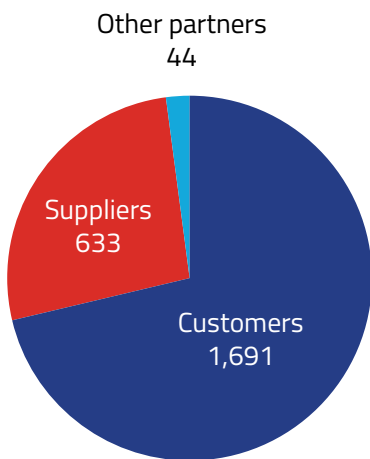
# Due diligence

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

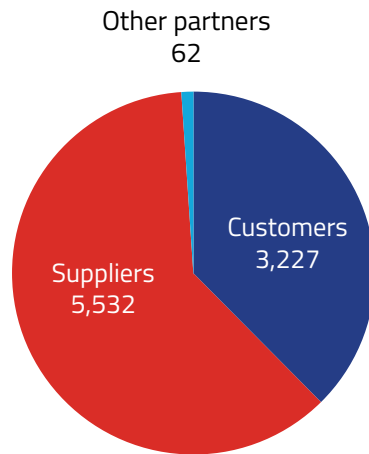
We have an internal team of due diligence analysts who support all areas of our program. They use third party research tools and external due diligence providers if additional expertise is needed.

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.

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.

## 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.
- 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 procurement 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.

## 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. Afterwards we 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.



### Leadership oversight and audit

We continue to report to the Board every six months on modern slavery.

Our Internal audit team did a detailed review of our modern slavery program at the beginning of last year. This provided useful feedback which we have included in this year’s plans.

# 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 procurement.
Supplier monitoring	Work with our global assurance team to include modern slavery in our existing audit processes.	We performed spot checks on high risk suppliers to create a baseline of compliance with the due diligence process.  We created training for people who visit sites on our behalf (our own employees 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.

# Annual risk assessment

Under our new procedure for modern slavery we must review our risk profile every year. 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 employees 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 procurement 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. Make sure our joint venture partners adopt modern slavery prevention programs which align with ours.
Our suppliers and contractors	Review our current project procurement supplier registration tools and seek opportunities to use them more broadly across our corporate procurement 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	Implement updated Responsible Business Assessment with enhanced focus on modern slavery. Include modern slavery prevention themes in existing procedures and training for construction projects. Actively engage in <b>Building Responsibly</b> to implement the 10 Worker Welfare Principles.



# Who is covered in our statement

Our statement covers all of the entities within the Worley Group and has been reviewed by our modern slavery stakeholder community, our CEO and our Board.

## Reporting entity identification

This statement is made 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)
- Worley ECR Pty Ltd (ACN 631 041 195)
- Worley Engineering Pty Limited (ACN 008 876 284)
- Worley Financial Services Pty Limited (34 099 425 831)
- Advisian Pty Ltd (ACN 098 008 818)
- Intecsea Pty Ltd (ACN 008 961 260)
- Energy Resourcing Australia Pty Ltd (ACN 076 232 605)

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

- Worley Europe Ltd
- Worley Group UK Limited
- Worley Services UK Limited
- Energy Resourcing Europe Ltd

## Consultation and engagement

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. We determined our recruitment company Energy Resourcing had different supply chains and risks to the rest of the Worley Group.

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.



### Specialists service brands

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### Specialists sub brands

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Energy Resourcing



# Summary of this statement against the requirements

UK statement requirements	Australian statement requirements	Where in the document
Clearly name the parent and subsidiary organisations 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 Industry landscape
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	Polices and governance
Due diligence processes		Due diligence
Training on modern slavery and trafficking		Training
Risk assessment and management		Industry landscape
		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	Leadership oversight and audit
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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