

1. Objectives

The Supply Chain Code of Conduct (the Code) sets out the minimum ethical expectations of Suppliers and Contractors who work with Worley.

2. Scope and Applicability

Worley maintains the highest standards of corporate governance and ethics, and conducts business in an open, honest, and ethical manner as per our Code of Conduct and other policy commitments. This includes commitments on human rights, sustainability, and diversity, equity and inclusion. Find out more here: <https://www.worley.com/investors/corporate-governance>.

Worley actively strives to implement ethical, socially responsible supply chain practices and anti-bribery, corruption, and modern slavery practices. We do this by working closely with our Suppliers and Contractors as partners.

As a signatory to the United Nations Global Compact¹, we align our business practices with the ten universal principles on human rights, labor standards, environmental responsibility and anti-corruption, and support the United Nations Sustainable Development Goals. Consistent with this approach, we expect our Suppliers and Contractors to provide products and services in a manner that supports sustainable development and to meet or exceed the requirements set out in this Code. Suppliers and Contractors are also expected to communicate these expectations and take reasonable steps to ensure compliance by their own suppliers, subcontractors and business partners engaged in delivering goods or services to Worley.

Worley is committed to the proper management of the data provided by its clients, suppliers and employees, in accordance with its Privacy Policy available here: <https://www.worley.com/-/media/files/worley/investors/corporate-governance/policies/2024/wor-privacy-policy-2024.pdf>

Worley conducts due diligence on Suppliers and Contractors per Worley's data privacy notice, available here: <https://www.worley.com/-/media/files/worley/suppliers-and-contractors/wor-privacy-notice-suppliers-business-partners.pdf>

This Code shall be applied to all Contractors and Suppliers, and their subcontractors and sub-suppliers. Worley reserves the right to audit compliance with this Code and cancel business with Suppliers and Contractors who do not meet the minimum expectations set out herein.

¹ <https://unglobalcompact.org/what-is-gc/mission/principles>

A breach or potential breach of the Code must be reported at www.worleyethics.com

3. Requirements to be met

3.1 Legal Obligations

- Compliance with all applicable laws, regulations, and government directives.
- Disclose to Worley anything that could impact the Supplier / Contractor's ability to provide goods or services as contracted by Worley.

3.2 Management Systems

- Implement adequate management systems (policies, plans, accounting and reporting mechanisms and performance measures).
- Demonstrate senior management commitment to an effective and transparent culture of compliance.
- Report on social, ethical, safety, governance and environmental performance, including Scope 1, Scope 2, and Scope 3 greenhouse gas emissions relevant to the goods and services provided to Worley², at the request of Worley.
- Provide regular training and communication to ensure Supplier / Contractor personnel are aware of the requirements set out in these management systems.
- Ensure that Supplier / Contractor's management system includes a program of auditing and continuous improvement.
- Publish and advice to employees and community members associated with Suppliers or Contractors providing goods or services to Worley that any concerns or suspicions regarding misconduct or wrongdoing should be reported through Worley's Ethics Helpline.

3.3 Anti-Bribery and Corruption

- A zero-tolerance approach to bribery and corruption including facilitation payments, must always apply.
- Compliance with all applicable laws, regulations, and government directives, including, but not limited to, the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act and Criminal Code Act 1995 (Cth).
- Implement adequate policies, procedures, and controls to prevent, detect, and respond to bribery and corruption. This includes conducting risk assessments to

² Refer to the GHG Protocol for guidance (link: <https://ghgprotocol.org/>).

identify bribery and corruption risks, maintaining records of these risks along with relevant management plans, and training personnel on bribery and corruption.

- Notify Worley promptly of any breach, or potential breach, of bribery and corruption compliance expectations relating to the business relationship. This includes situations where the Supplier / Contractor has been approached to provide something of value in exchange for a favourable outcome that could benefit Worley, even if such an approach was declined and no improper conduct occurred.
- Disclose any actual, potential, or perceived conflict of interest to Worley immediately. A conflict of interest is any situation in which a person or entity associated with the Supplier / Contractor (e.g. an employee, shareholder, etc.) has a private or personal interest, directly or indirectly, that could influence, or be perceived to influence, their impartiality in providing goods or services to Worley or otherwise impacting Worley's business.

3.4 Human Rights and Modern Slavery Prevention

- Implement adequate policies and procedures that respect the fundamental human rights of people and will not be complicit in activities that encourage abuses, including modern slavery (human trafficking, forced labor, child labor, debt bondage, deceptive recruitment, and domestic servitude)³.
- Comply with all relevant laws and regulations regarding human rights, anti-slavery, employment and promote ethical labor practices and working conditions, including compliance with the Building Responsibility Principles <https://www.building-responsibly.org/> which aspire to be the leading standard on worker welfare for the engineering and construction industry. Our Suppliers and Contractors are expected to comply with these principles, at a minimum ensuring:
 - Workers are treated with dignity, respect and fairness and are not subjected to any forms of discrimination, abuse, inhuman or degrading treatment;
 - Recruitment practices are ethical and voluntary with all fees associated employment to be paid by the employer;
 - Freedom to change employment is respected. Access to documentation and mobility is unrestricted;
 - Working conditions are safe and healthy and living conditions where applicable are also safe, clean and habitable;
 - Wages and benefits are respected with workers to be paid wages regularly and on time in accordance with local labor laws and contractual arrangements;

³ For more information on Worley's commitment to Human Rights, refer to Worley's Modern Slavery Statement available on <https://www.worley.com/en/site-services/modern-slavery-statement>

- Workers representation is to be respected with the right to freedom of association and to bargain collectively or have access to alternative means to recognize workers where restricted under law;
- Grievance mechanisms and access to remedy are to be made available without fear of retaliation, retribution or dismissal.
- Undertake human rights due diligence to identify, assess, mitigate and remedy risks and adverse impacts that you may cause or contribute to.
- Ensure subcontractors and sub suppliers comply with obligations equivalent to those set out in this section.

3.5 Health and Safety

- Comply with all relevant health and safety laws, regulations and industry requirements.
- Provide a safe and healthy work environment for its personnel.
- Publish a written health and safety policy and relevant standards.
- Maintain a documented system to identify risks and reduce work-related injury and illness.
- Clearly set out how health and safety will be managed for any contractors or subcontractors engaged by the Supplier / Contractor.
- Ensure personnel are appropriately trained and competent, particularly for health and safety critical roles; and
- Produce and test written emergency response plans (ERP) designed to minimize harm to employees, local communities and local environments in the event of any site disasters.

3.6 Environmental Protection

- Comply with all relevant environmental laws, regulations and industry requirements, including all reporting obligations.
- Hold and maintain all applicable licenses, permits, registrations and approvals required to lawfully conduct its operations.
- Maintain a documented environmental policy that demonstrates a commitment to environmental responsibility.
- Supplier / Contractor will consider how to prevent pollution, reduce waste generation and water usage as well as measures to promote biodiversity in its operations.
- Manage their operations so any potential negative impact on the environment, biodiversity and ecosystems or community is prevented or minimized where unavoidable.

- Identify climate-related impacts, risks and opportunities across their operations, products and services, with a clear emphasis on taking reasonable and practicable steps to reduce greenhouse gas emissions and strengthen climate resilience where relevant.
- Report any environmental incidents involving or affecting Worley, in accordance with applicable contractual requirements and local procedures.
- Provide environmental and climate performance information to Worley upon request, including emissions data, targets, and strategies to support Worley's net zero commitments⁴.

3.7 Quality

- Apply industry processes and improvement in product quality and services around quality, control, supplier selection, continuous measurement, learning and customer feedback.
- Maintain quality control procedures and standards which are understood and adopted through Supplier / Contractor's organization and the supply chain.
- Maintain ISO9001:2015 certification (Quality management) or other specifications as required in the contract scope.

3.8 Sub-suppliers and Sub-contractors

- Implement a process to select, monitor and manage sub-suppliers and sub-contractors, including technical and commercial performance, effective and accountable quality practices, exclusion of counterfeit materials and minimal rework.
- Adopt similar minimum standards to these in dealing with sub-suppliers and sub-contractors.
- Conduct due diligence across your supply chain to ensure the intent of this Code is met, including (but not limited to) providing for timely payment, prevention of modern slavery, bribery and corruption, and promotion of human rights⁵.

3.9 Community Engagement

Worley believes every company has a responsibility to the local communities on which they have an impact and from which they profit. Our approach is to understand the issues facing the communities in which we operate and to conduct business in a way that builds social capital and achieves a positive impact. This includes:

⁴ Worley encourages Suppliers and Contractors to measure and report Scope 1, Scope 2 and Scope 3 greenhouse gas emissions, in accordance with the GHG Protocol Corporate Standard.

⁵ See our Human Rights Policy, and the United Nations Global Compact Principles 1 and 2 for more information.

- Identifying and assessing risks to the communities in which Supplier / Contractor operate their businesses within and adopting measures to minimize such risks.
- Engagement with community stakeholders and long-term strategic involvement in community partnerships to address key social issues.

3.10 Personal Data Protection and Data Retention

- Comply with Worley's General Data Protection Standard ("Privacy Standard") and all relevant local and national laws relating to the privacy and security of personal data, including the European Union General Data Protection Regulation (EU GDPR).
- Establish a process to ensure that Supplier / Contractor's own sub-suppliers, service providers, and subcontractors comply with Worley's Privacy Standard and all relevant privacy laws.
- Retain and maintain authentic, reliable and usable records for the period required by law or for such longer period as is needed to meet Supplier / Contractor operational requirements or comply with agreements with Worley.
- Ensure that all Worley records are returned to Worley in accordance with the applicable contractual agreement upon termination or expiry of the engagement, and that any remaining records are securely destroyed once they have exceeded the applicable retention period prescribed by law or the relevant customer contract, whichever period is longer.
- Fully comply with all laws and regulations with respect to record management, storage and destruction.

3.11 Information Security

- Comply with Worley's Information Security Policy⁶ and maintain robust information security controls to protect Worley's systems, data, and intellectual property against unauthorized access, disclosure, alteration, and disruption.
- Promptly report security incidents that could affect Worley.
- Establish a process to ensure that Supplier / Contractor's own sub-suppliers, service providers and subcontractors comply with Worley's Information Security Policy.

3.12 Anti-competition

- Supplier / Contractor must not engage in any activity that promotes unlawful anti-competitive behavior.

⁶ Refer to our Information Security Policy ([link MS-IT-POL-0002](#))

3.13 Whistleblowing

- Report any concerns or suspicions of misconduct and/or wrongdoing to Worley's Ethics Helpline. The Worley's Ethics Helpline is a confidential reporting system available 24/7 365 days per year, where reports can be made anonymously and protect against retaliation provided to those reporting genuine concerns. Reports should include concerns about breaches of laws, rules and regulations, not limited to a criminal offence, damage to the environment, health and safety, human rights violations, breaches of the Code of Conduct and other unethical behavior.

3.14 Trade and Export Control

- Comply with applicable laws and regulations relating to export, trade sanctions, non-proliferation and arms control.
- Implement adequate policies and reliable systems in place to prevent the use of illegally or unethically sourced materials, and specifically policies and systems to prevent improper procurement of conflict minerals, which may include tantalum, tin, tungsten, and gold.
- Take action to prevent counterfeit, fraudulent and suspect items from entering the supply chain.

3.15 Media

- Ensure any broad communication regarding Supplier / Contractor's business relationship with Worley, including Worley's customers, but not limited to marketing materials, press releases, social media posts or media interviews, are formally approved prior to publication or broadcast by media.relations@worley.com.

Revision History

Rev No	Rev Date	Description of Change	IS ID
Rev 6	11 May 2026	Comprehensive update across all sections to align the Supply Chain Code of Conduct with updated Worley policies and standards	5907
Rev 5	14 October 2024	<ol style="list-style-type: none"> Added new paragraph in section 2, paragraph 3 about Worley commitment to the proper management of the data provided by its clients, suppliers and employees. Updated section 2, paragraph 4. Added the word 'notice' and link to access the privacy notice for suppliers. 	4021
Rev 4A	03 June 2024	Due to the Diversity and Inclusion Policy has been renamed to the Diversity, Equity and Inclusion Policy, all references to this term 'Diversity and Inclusion' has also been changed to 'Diversity, Equity and Inclusion'	3700
Rev 4	22-February-2023	<p>Due to this document is mandatory by compliance and audit and has vast impact on many functions: Compliance, Sustainably, Supply Chain, Corporate Procurement and Data Protection Office. This document has been released on 22 February 2023, but the communication of this document will be done as part of the 01 March 2023 Monthly Release.</p> <p>Revised document based on stakeholders' review and suggestion. Updates include:</p> <ul style="list-style-type: none"> Code of Conduct link updated with the corporate governance link to replace the old Code of Conduct link Updated Worley Privacy Policy Notice link in section 2 Scope and Applicability UN Global Compact text moved from section 3.13 Media to section 2 Scope and Applicability Added additional text in section 2 Scope and Applicability Updated 3rd bullet point in section 3.2 Management Systems Updated 1st bullet point in section 3.5 Labor / Workplace Management Updated 3rd bullet point in section 3.7 Environmental Sustainability Updated 3rd bullet point in section 3.9 Sub-suppliers and Sub-contractors Updated 1st bullet point in section 3.11 Personal Data Protection <p>Added new bullet points in section 3.3 Anti-Bribery and Corruption, 3.4 Modern Slavery Prevention and 3.7 Environmental Sustainability</p>	2372
		Replaced WorleyParsons Privacy Policy Notice with Worley Privacy Policy Notice	2418
Rev 3	02-November-2020	<p>Revised document based on stakeholders' review. Updates include:</p> <ul style="list-style-type: none"> Added link to code of conduct Removed reference to Life approach Added statement on Conflict of Interest Added new section 3 	708
Rev 2	01-July-2020	Added a statement on modern slavery	399
Rev 1	01-May-2020	Removed reference to integrity framework and OneWay	136
Rev 0	01-December-2019	Issued for Use	