

1 Purpose

To outline Turner & Townsend's commitment to the elimination of modern slavery and our approach to ensure compliance with our obligations under the Modern Slavery Act 2015.

2 Business context

We are an independent professional services company specialising in programme management, project management, cost management and consulting across the property, infrastructure and natural resources sectors. We operate globally, with approximately 100 offices worldwide.

Our service provision is delivered by our global workforce; as a professional service organisation, our supply chain is relatively limited.

Further information about Turner & Townsend's structure, functions and the markets within which we operate can be found at <http://www.turnerandtowntsend.com>.

3 Scope

Our policy applies to all businesses within Turner & Townsend Limited and our direct suppliers.

4 Our policy statement

We are committed to ensuring our business and supply chains are 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 ensure compliance with any legislation. We are a business that upholds integrity and transparency in all our business dealings and our modern slavery prevention measures are no exception.

The risk of modern slavery and human trafficking within our recruitment, employment and suppliers is minor. We mitigate this risk through our process as described below.

5 Processes in relation to slavery and human trafficking - Recruitment and Employment

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

We have robust recruitment practices, including 'right to work' checks for all prospective employees and maintain a preferred supplier list of agencies that are sourcing candidates on our behalf. This ensures we maintain an assured overview of those entering our employment and prevents the occurrence of forced or involuntary labour.

We have human resources representatives working with senior management in each region to ensure that:

- recruitment practices are fair and equitable and in accordance with the appropriate local employment laws
- company standards, values, corporate behaviours and policy are being adhered to
- satisfactory working conditions and related safeguards are in place
- appropriate training is provided.

Modern Slavery Act statement

Turner & Townsend Ltd

Where we have third parties providing services on behalf of Turner & Townsend within our own work sites, we have well-established processes for the engagement of their services, ensuring that their conduct and working practices are consistent with our own.

If a suspected breach of this policy has occurred, is occurring, or may be about to occur, it is the responsibility of everyone working for Turner & Townsend, or on our behalf, to report it. We have protected reporting mechanisms in place under our whistleblowing policy that allow anyone to report potential non-compliance in confidence and without fear of repercussion.

We operate a number of internal policies that protect our employees:

- recruitment policy
- whistleblowing policy
- disciplinary policy
- anti-discrimination policy suite
- contractor engagement policy.

6 Processes in relation to slavery and human trafficking - Suppliers

It is our expectation that our suppliers will adhere to our commitment to a zero tolerance approach when it comes to any form of slavery or human trafficking.

From 01 January 2017 our standard terms and conditions for the appointment of suppliers will mandate compliance with the Modern Slavery Act 2015, or equivalent, if applicable to the organisation.

We have an expectation that any suppliers contracted by our organisation are committed to:

- complying with the provisions of the Modern Slavery Act 2015
- taking steps to prevent modern slavery within their business and supply chains
- paying the national living wage for UK-based employees. For non-UK based locations, the wages of their employees must meet applicable local standards.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Signed:



Date: November 2018

Vincent Clancy
Chief Executive Officer
Turner & Townsend Limited