

1.1 Introduction

Turner & Townsend are 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 over 100 offices worldwide.

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.

Turner & Townsend's financial year runs from May to April each year. This statement has been published in September 2019, and outlines our planned activity for the financial year 2019/20.

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 over 6,000 employees worldwide and operate in 45 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.

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 Polices 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 corporate responsibility strategy is underpinned by four pillars which include integrity in industry and community value and it is aligned to the United Nations Sustainable Development goals, a voluntary initiative based on CEO commitments to implement universal sustainability principles.

In 2017, in addition to the internal processes we already had in place, we also launched an external anti-bribery and corruption hotline so that our workforce can raise concerns independently.

1.6 Risk assessment

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.
- 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.

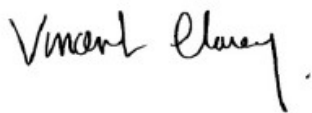
Further training will be given to staff as identified below.

1.8.1 Further steps

During the course of the next business year 2019/20, we have identified the following activities to progress our commitment to the Act:

- We shall work with our significant suppliers to ensure that they are complying with the Act and thereafter will seek express annual confirmation of their compliance;
- To 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;
- To review the terms and conditions we have with our UK based contractors and sub-contractors and include conditions covering our slavery and human trafficking supplier commitment;
- To amend our standard terms and conditions for the appointment of UK based sub-consultants to specifically require compliance with the Act, if applicable to the organisation;
- Awareness raising – identify champions of the Act (recruiters, purchase ledger and key employees involved in the engagement of suppliers) to raise awareness; and
- Raise awareness with other parts of our global business so that they understand the impact of modern slavery and human trafficking and thus give consideration to how they can make changes to minimise the risks, as appropriate.

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



Vincent Clancy
Chief Executive Officer
19 September 2019