Our Code of Conduct

Doing the right thing

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Our values

Care.
Commitment.
Courage.

Everything we do is with an unwavering commitment to what we believe in and how we behave.

A message from Neil Bruce, Chief Executive Officer

At Wood, our purpose is simple: serve our clients with world-class expertise. For more than a century, clients have trusted us to solve tough challenges. As part of Sidara, that purpose remains, with sharpened focus and discipline.

Clients choose Wood because they trust us. They expect us to work safely, act responsibly and do the right thing, every time. This Code is a practical guide to what "doing the right thing" looks like. It sets the standards we all follow – every person, every role, every day.

The Wood Leadership Team and Sidara are aligned on this: knowing, understanding and following the Code is not optional. Acting with integrity is essential to who we are. Trust takes time to earn and moments to lose. Every good decision strengthens Wood and the relationships we rely on.

Two behaviours matter most. If something doesn't feel right, speak up early – ask the question, raise the concern, or get advice. And when someone brings something to you, listen properly – give them the time, respect and attention they need.

Speaking up is a strength. It helps us prevent issues, learn quickly and act when something isn't right. My commitment is clear: when you speak up, we will listen – and retaliation against anyone who raises a concern in good faith will not be tolerated.

Thank you for your commitment to doing the right thing and for helping protect the trust our clients place in us.

Neil



A message from John Habgood, General Counsel

Doing the right thing is more than just complying with applicable laws and regulations. It's about acting with integrity, which means being fair, honest and transparent and having the courage to follow the Code, even when it's difficult.

We will all sometimes face situations the Code doesn't explicitly cover. When that happens, use the decision-making guide to help you think it through, and ask for help if you need it. You're never expected to make difficult judgement calls alone.

There may also be times when you see behaviour that doesn't align with the Code or our policies, standards and processes contained within our Business Management System. When you do, it's important to raise it. Speaking up protects our people, our clients, our reputation, and the long-term strength of the company.

Remember, the culture we walk past is the culture we accept. If something doesn't feel right, say something. We provide several Speak Up channels so you can choose the one that feels right for you. What matters is that you use your voice – and that we listen.

Thank you for your commitment to doing the right thing.

John



When deciding how to handle a work-related situation, ask yourself:

1 Is my action or choice consistent with Wood's values and in compliance with our Code and company policies?

2 Is my action or choice honest, legal and ethical?

3 Is my action or choice safe for me and others?

4 Would my action or choice and its outcome be perceived positively by Wood, my team, my family and the community?

Getting to "Yes": How we make ethical decisions at Wood

Our values set the foundation for our Inspired Culture which is critical to us as a business. They guide us in our behaviours and provide a common set of expectations wherever we are in the world.

Our Inspired Culture is vital to our success. Your contribution is to lead by example with colleagues, customers and communities alike; you are expected to exercise good judgment and do the right thing.

Our Code is not a collection of every rule, nor can it cover every situation.

Decisions are not always straightforward. If the answer to any of the questions above is "NO", or not "YES", or if you are uncomfortable with any of your answers, seek guidance using any of the Wood "Speak Up" resources.

v Wood Code of Conduct



Using Our Wood “Speak Up” Resources

1.
Can you speak to your team leader about your question or concern?

○ YES ○ NO

2.
Can you speak to another team leader (in your business or another business)?

○ YES ○ NO

3.
Can you contact HR, Legal, or Ethics & Compliance?

○ YES ○ NO

4.
If none of these Speak Up options work for you, contact the Wood Ethics Helpline.



If you need to Speak Up our guidance is to follow the questions set out above to work out who best to speak to. Please remember, this is only our guidance. Above all, you should take the course of action that you feel comfortable taking.

For HSSE&S issues, contact your service line HSSE&S leader

For media inquiries, contact **press.office@woodgroup.com**

For social media inquiries, contact **communications@woodgroup.com**

Our Code of Conduct:

Doing the right thing

Purpose

At Wood ("our Company"), doing the right thing guides how we work and live. Our Code establishes standards to conduct business with integrity, helping us achieve our ethical and legal commitments, and provides general principles to help you make the right decision whatever the situation. By following the Code, you maintain, strengthen and protect our reputation and success.

Applicability

We are all responsible for acting in compliance with this Code and avoiding even the appearance of impropriety, regardless of business or location. In this Code, "we" or "our" refers to all employees, including officers, directors, short-term workers and consultants, working within any Wood entity, which includes all subsidiaries of Wood and all joint ventures subject to Wood policies.

We also require our business partners, such as suppliers (including any commercial intermediaries and consultants), contractors and any joint venture not subject to our policies, to follow the principles set out in this Code and our ***Supply Chain Code of Conduct*.**

In situations where a local custom or a particular customer's policy differs from our values, policies or applicable law, you must comply with the higher standard.

Our Business Management System

Wood deploys a formal Business Management System (BMS) in which our Code is the overarching document, sitting at the top.

Supporting the Code is a structure of policies, standards and processes that apply at various levels throughout the organization based on their scope. These form a critical part of our risk management framework and must be understood and followed. You are responsible for understanding which policies, standards and processes apply to your role, and for complying with them. If you are unsure if a BMS document applies or has questions about how to comply, seek guidance from your team leader or the relevant team responsible for the policy before proceeding.

Further details on the BMS, including the hierarchy of documents and formal deviation processes, can be found in our ***BMS Content Procedure*.**

Our shared expectations

Compliance and ethics touch every role at Wood, so we all play a part in creating an ethical work environment, which means acting with honesty, openness and fairness. Everyone must live our values and the Code: read it, understand it and act in accordance with it – that is your responsibility. We must act in a manner that is safe, ethical and consistent with applicable laws and regulations as well as our own expectations in the Code and supporting policies, standards and processes contained within the BMS.

We all have a duty to report any unethical, illegal or suspicious activity and any concerns that our Code is not being followed. Reports may be made confidentially via our "Speak Up" resources or anonymously via the Wood Ethics Helpline, which is operated by a third-party provider and is available 24 hours a day, 7 days a week online and telephonically. Anonymous reports must contain sufficient information to enable an effective investigation. Keep in mind, however, that it is helpful for you to identify yourself so that the investigation team may contact you for further information.

Responsibilities of team leaders

Team leaders must support and foster a workplace that recognizes our values and demonstrates ethical conduct. This involves following and role-modelling our Code and our Wood Behaviours. In practice this means:

- Making certain your team understand their responsibilities under our Code and are aware of relevant policies, standards and procedures within the BMS;
- Encouraging your team to speak up if they have questions and concerns, ensuring they feel safe to do so, and taking the time to listen when they do, ensuring appropriate action is taken; and
- Ensuring that all ethical concerns, including suspected misconduct or potential breaches of the Code, are promptly escalated to Ethics & Compliance.

A **team leader** is the manager, supervisor or other individual to whom you report.

Investigation of reports

Wood takes all concerns seriously and is committed to investigating reports in a consistent manner. Any concerns related to the Code are generally addressed by Ethics & Compliance, Legal, Internal Audit or HR in line with applicable investigation, grievance and/or disciplinary processes. You are expected to cooperate with all investigations by providing honest, truthful and complete information.

Reported information is treated confidentially to the extent reasonably possible and allowable by local laws.

While we strive to resolve matters internally, nothing in this Code or any other Wood policy or procedure should be interpreted as preventing you from reporting suspected unlawful conduct to governmental or regulatory authorities at any time.

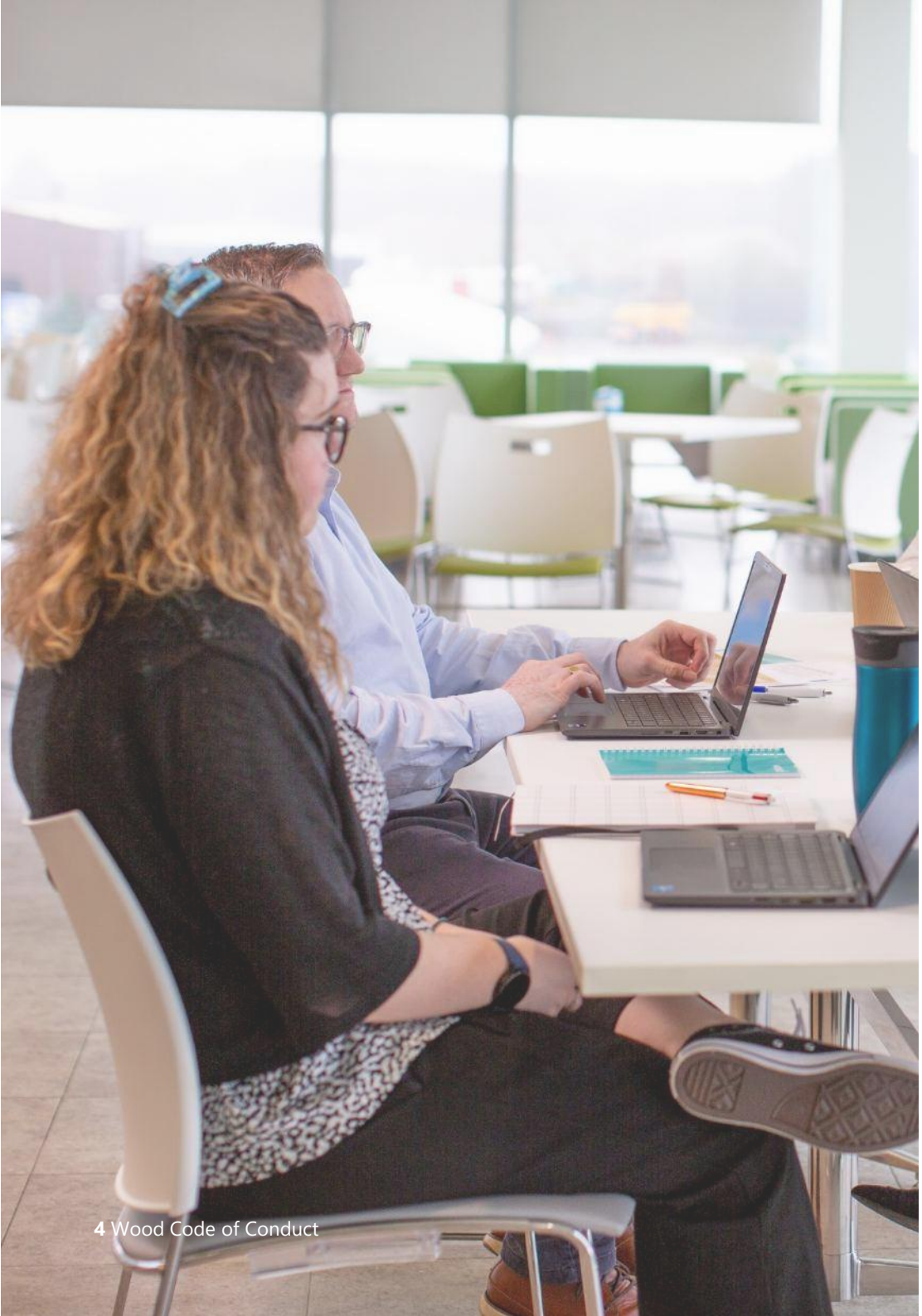
Question

Elizabeth overheard two team members plan a dinner at an expensive restaurant. One team member said, "I'll expense it. No one will know because we still have money in a project budget." Elizabeth knows that expensing an extravagant dinner like this is probably not allowed, but she is hesitant to say anything. What should she do?

Answer

Elizabeth has a good faith belief that her colleagues intend to violate the Code of Conduct. It can be hard to speak up, but she should report the issue using the Wood "Speak Up" resources. By doing so, Wood can promptly investigate the concern and take disciplinary measures or corrective actions, as appropriate. Elizabeth will be protected from any negative action towards her as a result of making the report.





Anti-retaliation

No one making a report in good faith should experience any negative action or discrimination as a result of making their report. "Good faith" means you have an honest belief that the information provided is truthful even if the information turns out to be incorrect.

Allegations of retaliation will be taken seriously and investigated like all other concerns, Those who retaliate against someone for reporting a concern or cooperating with an investigation may face disciplinary action up to and including termination.

For more information, see our ***Business Ethics Reporting and Anti-Retaliation Policy*.**

Consequences for violations

Employees who violate the law, our Code or our policies may also be subject to disciplinary action up to and including termination. Violations committed by non-employees, including a third party working on our behalf, may result in the termination of any relationship with Wood. Additionally, violations of our Code, policies or applicable laws may carry civil and/or criminal liability for the individuals involved as well as Wood.

Caring for each other and our communities

Workplace safety and health

Why does it matter?

By taking personal responsibility for health and safety, we all ensure that everyone goes home safe and well.

How does this apply to me?

You can demonstrate care and commitment by:

- Always following the rules and procedures, including the Life Saving Rules
- Always behaving in accordance with our Safety Essentials
- Immediately reporting any injury or ill health that is related to your work
- Only performing tasks for which you are trained and competent to execute
- Always reporting health and safety hazards and concerns to your team leader
- Always intervening and stopping the job if you believe that something is unsafe or a risk to health to you or your colleagues
- Never working under the influence of illegal drugs, alcohol or prescribed drugs that affect your ability to work safely
- Never bringing personal weapons that can harm others, such as guns, into the workplace or premises

For more information, refer to the ***HSSE&S Policy Statement and the Drugs and Alcohol Policy*.**

Protecting the environment

Why does it matter?

We are connected to one shared global ecosystem which we are committed to looking after and protecting.

How does this apply to me?

- You can protect our environment and biodiversity by:
- Understanding and managing environmental impacts
- Applying Wood's environmental standards to work that we do
- Reducing carbon emissions by supporting the achievement of our targets
- Reducing, reusing or recycling waste (e.g., eliminate single use plastic from your workspace)
- Promoting environmental improvement in our projects e.g. decarbonisation, sustainable material use
- Always complying with environmental laws and regulation

For more information, refer to the ***HSSE&S Policy Statement and our approach to Sustainability*.**

Community involvement

Why does it matter?

We care about the communities in which we operate and recognise our responsibility to respect, nurture and empower the people and locations we impact.

How does this apply to me?

Wood employees contribute time and talents to make a positive impact on the communities where we live and work. You can facilitate opportunities to partner with the community and ensure our commitments are transparent, ethical and always in alignment with Company values.

Equal opportunity

Why does it matter?

We are committed to providing equal opportunities to all current and prospective employees, and to creating a working environment that is free from discrimination, where everyone can reach their maximum potential.

The rich diversity of experience, expertise, backgrounds, and beliefs we bring together globally, differentiates our business, powers our progress and enables our success. Being inclusive of diversity enables us to offer different skills, ideas, approaches and expertise to the business and our customers.

How does this apply to me?

We celebrate the diversity of our workforce and expect everyone to respect and embrace other people's differences. We require all our people to treat each other fairly and with respect.

People at Wood must not engage in behaviour which has the purpose or effect of discriminating against others on any basis or status protected by applicable law. Such discrimination is unacceptable and will not be tolerated.

For additional information about how we ensure equal opportunities, refer to our ***Equal Opportunities Policy*.**

Question

Rudi's team is hiring for a new position and deciding between two candidates. One candidate is pregnant and is planning to go on maternity leave in six months' time. The candidate has the right experience, qualifications and skills for the position; however, Rudi is concerned that he would need to backfill her forthcoming maternity leave. Is there a legitimate reason to reject this candidate?

Answer

No. We cannot consider the fact that a candidate is pregnant and therefore likely to be absent on maternity leave after being appointed when making recruitment decisions. If the candidate is refused employment for reasons related to her pregnancy, this will be discriminatory. We select people for employment or promotion based on merit, ability and suitability for the job. We treat our employees with fairness and respect and will happily consider reasonable adjustment requests from candidates to carry out their role, if required.



Bullying and Harassment

Why does it matter?

We believe that a culture of diversity, equity and inclusion not only benefits our global business but supports wellbeing and enables our people to work better because they can be themselves and feel that they belong. We do a lot to support our inclusive culture and you can read more about this in our ***Diversity, Equity and Inclusion Policy*.**

An important part of fostering a culture of diversity, equity and inclusion is seeking to eradicate bullying and harassment as unacceptable behaviours at Wood.

Our global ***Bullying and Harassment Policy*** sets out our approach to promoting a working environment based on dignity and respect, and one that is free from bullying, discrimination, harassment, and victimisation.

How does this apply to me?

We expect you, and every one of our people, to take personal responsibility for observing, upholding, promoting and applying our ***Bullying and Harassment Policy*** and any local anti-harassment and anti-bullying policies and procedures. Whatever your job is, this is part of your role.

Anti-harassment and anti-bullying laws will vary depending on your location. However, we believe that fostering a working environment that is free from bullying and harassment is about more than simply following laws.

A workplace culture, where bullying or harassment is tolerated, is harmful to the wellbeing of the workforce as well as the wider business.

There is no justifiable reason to bully or harass someone else. For example, holding particular religious or political beliefs will not justify bullying, or harassing a colleague because of their sexual orientation. Even if you do not intend to cause offence, it is important to be aware that it is the impact of the conduct/behavior on another employee that may constitute Harassment.

We therefore adopt a zero-tolerance approach to instances of bullying and harassment, meaning that you must:

- familiarise yourself with the examples of bullying and harassment as set out in our ***Bullying and Harassment Policy*;**
- not commit, authorise or condone any act of bullying or harassment;
- speak up without delay if you experience or witness bullying or harassment by raising it with your manager, your HR representative or via the Ethics Helpline.
- take appropriate action if you become aware of bullying or harassment being committed against others; and
- complete any anti-bullying and anti-harassment awareness and training courses that we require you to undertake.

Labour and wage laws

Why does it matter?

We are committed to working to and promoting the highest standards of human rights, guided by the "Universal Declaration of Human Rights" as set out within our Global Human Rights Policy. Wood follows applicable employment laws and labour laws, including those related to freedom of association and collective bargaining. We do this because we seek to conduct our business in a way that maintains high standards of ethics and integrity and promotes the dignity and respect by which everyone working for Wood should be treated.

How does this apply to me?

We are committed to protecting and enhancing the human dignity of everyone working for Wood and everyone who has dealings with Wood, including our clients and supply chain partners. Respect for human rights is one of the cornerstones of our behaviours at Wood, creating an inspired culture where we look to build a working community in which everyone can contribute, feel included and feel comfortable to 'speak up'.

This means that you must:

- familiarise yourself with the requirements as set out in our Human Rights Policy and the supporting policies referred to therein; and
- speak up without delay if you experience or witness any Human Rights concerns by raising it with your manager, your HR representative or via the Ethics Helpline.

You must also, to the extent possible:

- ensure that due process is followed when appointing suppliers and that our supply chain partners are aware of the requirements as set out in our ***Supply Chain Code of Conduct;***
- ensure that no child, bonded, forced or involuntary labour is condoned or used in the production of Wood products or services;
- comply with all applicable wage and working-time laws and other laws or regulations affecting the employer-employee relationship and the workplace, including but not limited to those governing minimum age, minimum wage and working hours;
- ensure freedom of association and recognise the right of employees to join a trade union in accordance with applicable laws; and
- help to ensure that no one working for Wood will suffer retaliation for seeking to invoke their rights under employment legislation or reporting suspected non-compliance under said employment legislation.

Modern slavery and human trafficking

Why does it matter?

Treating people with dignity and respect is a fundamental part of our culture.

How does this apply to me?

You must respect and uphold (and enforce to the extent possible) the principles established in the Universal Declaration of Human Rights and commit to conducting our business in a manner consistent with all applicable employment and human rights laws and regulations wherever we have operations. You must commit to upholding employment standards in accordance with contractual arrangements. Wood has zero tolerance of human rights abuses of any kind including human trafficking or slavery in any part of our value chain.

For more information, refer to the ***Human Rights Policy and Modern Slavery and Human Trafficking Statement*** on our website.

The **Universal Declaration of Human Rights** is an international document that states the basic rights and freedoms to which all human beings are entitled.

Protecting information and assets

Confidentiality

Why does it matter?

Trade secrets and confidential and proprietary information are valuable assets. Protecting them is vital to our success. Our customers and employees expect us to maintain strict controls on the confidential information we hold or use. Sharing or using confidential information incorrectly can have serious consequences, including significant fines and penalties, criminal charges and loss of customer trust.

How does this apply to me?

As a general rule:

- Avoid discussing confidential matters in places where you might be overheard, including restaurants, restrooms, taxis, airplanes or elevators.
- Do not disclose confidential information to anyone who does not have a business need to know it.
- Do not send confidential Wood data or data concerning Wood's clients, partners or suppliers to a personal email address.

Do not disclose confidential information (including client or supplier information) to anyone unless disclosure is in compliance with any relevant contract and the recipient has a business need to know it.

Do not misuse our proprietary or employee information. Do not take confidential information with you if your employment with Wood ends (see also the Data Protection and Intellectual Property sections below).

Never accept or use the confidential information of our competitors; this may be illegal and would be considered serious misconduct. You must not retain confidential information from any previous employer and the use of any such information at Wood is prohibited. See also the Competition laws section below.

Inside information is a specific subset of confidential information – see the Inside information and insider dealing section below.

If you discover or suspect the unauthorised use or disclosure of confidential information, notify Ethics & Compliance or Legal immediately.

Confidential information can take many forms, such as technical information about our products and services, engineering designs, drawings and layouts, analyses and forecasts, customer and supplier lists, non-public financial information, employee information, company-specific know-how, documents and data created pursuant to customer contracts, and information relating to or supplied by our shareholders, customers and other business partners.

Question

The nature of Tatyana's work requires frequent travel, and she often finds herself reviewing information about customers and projects while at the airport or riding the train. What should Tatyana consider?

Answer

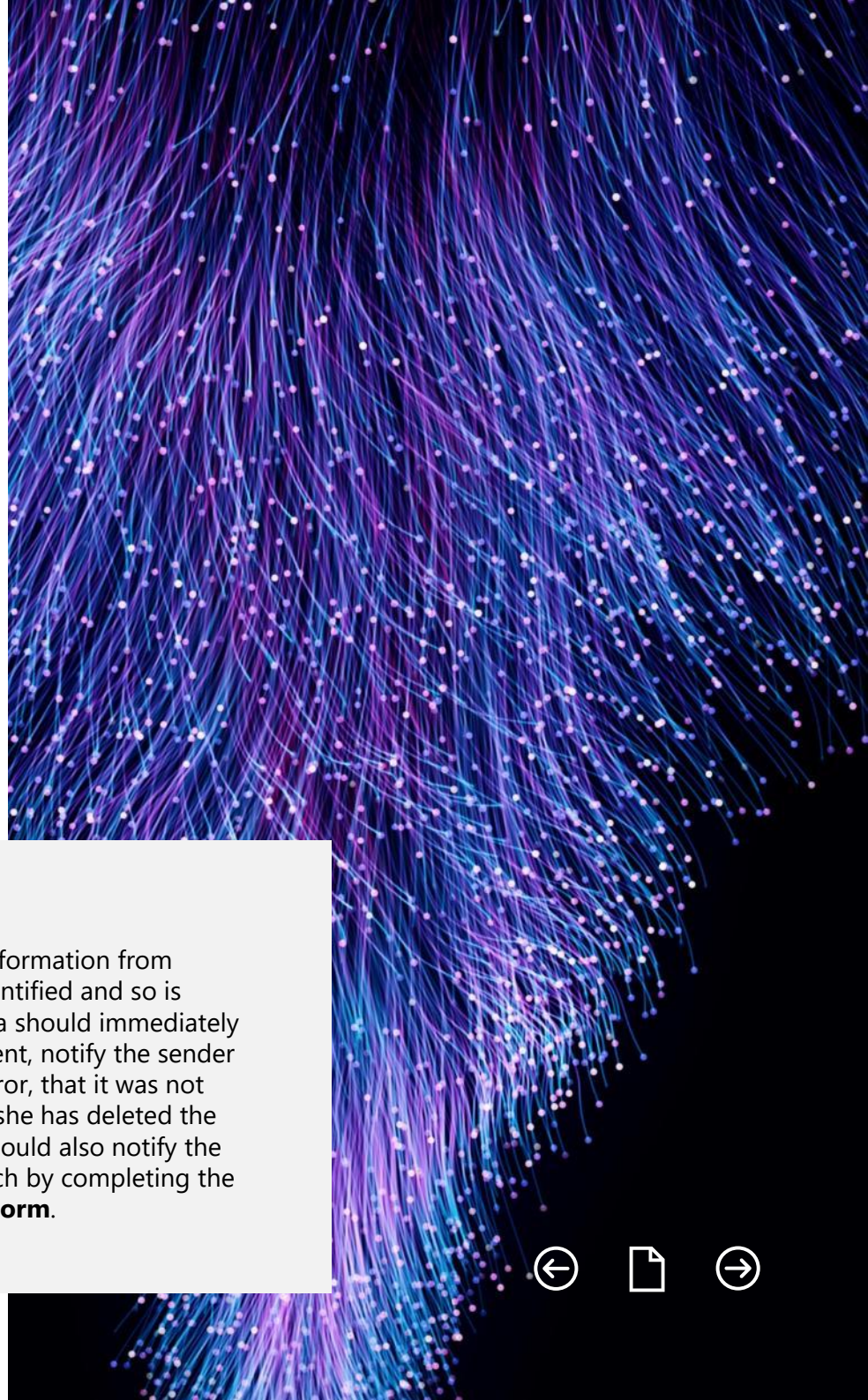
Tatyana should ensure that she is taking appropriate steps to protect the confidentiality of all business information in her possession, and she should avoid discussing confidential information in places where she might be overheard. By taking these steps, Tatyana will help us protect confidential information, maintain our customers' trust and protect our reputation.

Data protection

Why does it matter?
Shareholders, customers, suppliers, partners, our employees and other individuals often trust us with their personal data. Processing personal data transparently, fairly and securely is fundamental in maintaining the trust of our employees, customers and stakeholders.

As a global company, we are required to comply with data protection laws in many of the countries in which we operate. Wood applies the EU General Data Protection Regulation as standard in our global approach to privacy, with variances where required to meet local requirements.

What is personal data?
Personal data means any information that relates to an identified or identifiable natural person. This includes names, contact details, employee number, location data, race, ethnicity, political opinions, religious beliefs, union membership, biometric data, health data or sexual orientation.



Question

Sara works in the finance department; she receives an email from a colleague in the HR team which has an excel document attached to it with no password protection. On opening the document, Sara discovers that it includes a list of Wood employee names, employee ID, role, salary grade and Wood business email address. Sara has no idea why she has received the document. Is this personal data? What should Sara do?

Answer

Yes, the document includes information from which an individual can be identified and so is considered personal data. Sara should immediately delete the email and attachment, notify the sender that it has been received in error, that it was not password protected and that she has deleted the email and attachment. Sara should also notify the Privacy team of the data breach by completing the **Privacy Incident Reporting Form**.

Data protection, *cont'd*

How does this apply to me?
When using, handling, storing or receiving any personal data consider: **Why** are you processing the data, is there a legitimate reason and is it covered by our **Wood Worker Privacy Notice**? Only process the minimum amount of data needed for the purpose. **How** are you processing the data, is it secure? Keep all data secure and do not give anyone access to personal data without proper authorisation based on a business-related need. If sharing, **who** are you sharing it with, is it necessary? **What** are the data retention rules, how long should you keep it for? Do not keep data for longer than is necessary. Treat third-party personal data with the same care you treat Wood's information and respect our third parties' privacy policies and information security requirements.

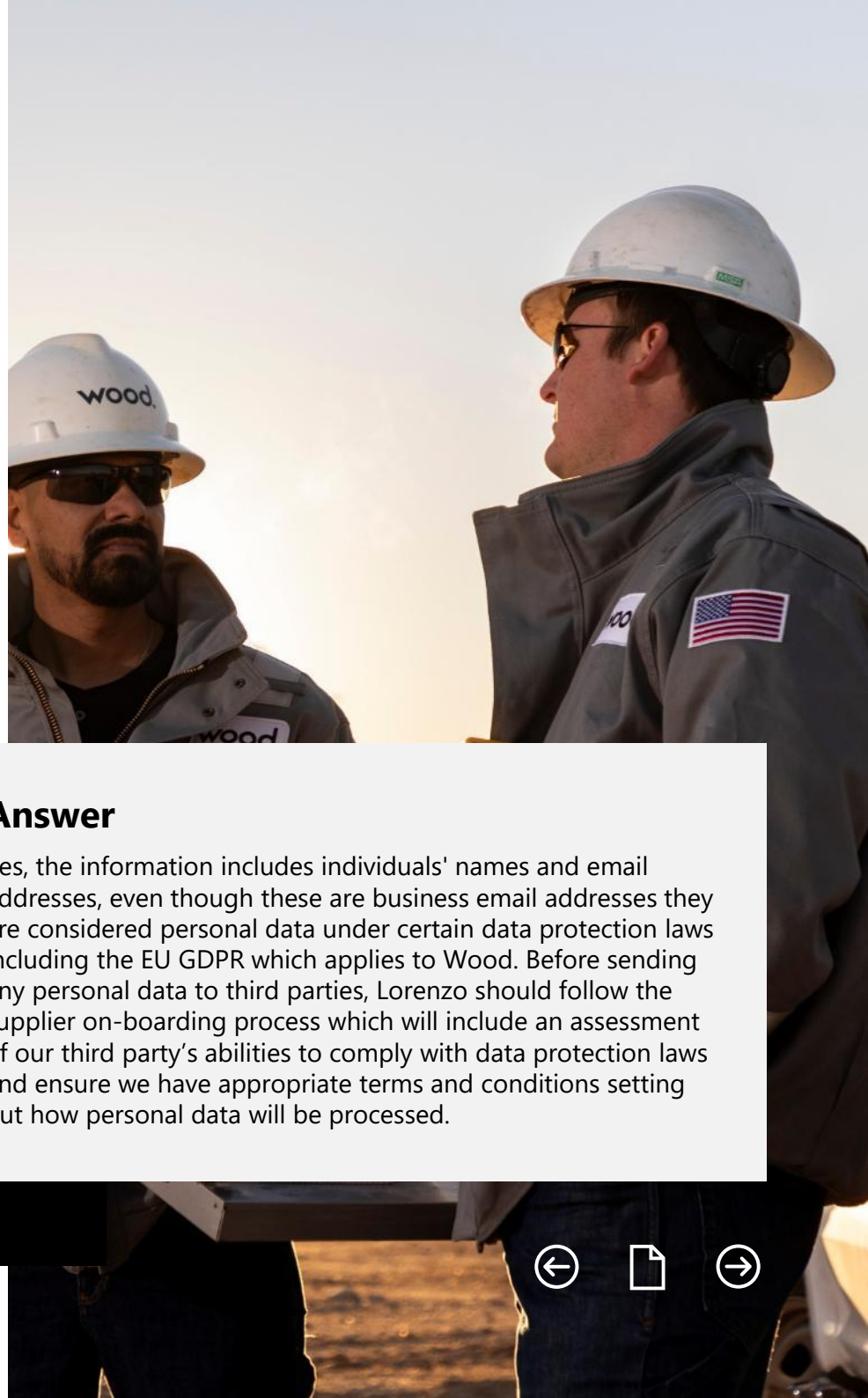
Familiarise yourself with our ***Data Protection*** and ***Data Retention Policies*** and uphold our policies and procedures for data protection wherever Wood does business.

If you are processing personal data under a new project, supplier or software application or there has been a change in how you process personal data, use our Assessment Toolkit to identify is a privacy assessment is needed.

If you think that the ***Data Protection Policy*** has been violated and/ or you become aware of a data breach, submit a **Privacy Incident Reporting Form**. For any other data protection questions or concerns, please contact Wood's Privacy team on **privacy@woodgroup.com** or contact your Wood Data Protection Ambassador.

Question

Lorenzo is instructing a new supplier to provide health and safety training to Wood employees. In order to deliver the training the supplier requires the names and email addresses of the proposed Wood attendees. Lorenzo hasn't finalised the supplier on-boarding process or signed the contract with the supplier but he plans to send the attendee information to the supplier in advance so that they can begin planning the training and issue invites. Are there any data protection concerns which Lorenzo should consider before sharing these details?



Answer

Yes, the information includes individuals' names and email addresses, even though these are business email addresses they are considered personal data under certain data protection laws including the EU GDPR which applies to Wood. Before sending any personal data to third parties, Lorenzo should follow the supplier on-boarding process which will include an assessment of our third party's abilities to comply with data protection laws and ensure we have appropriate terms and conditions setting out how personal data will be processed.

Intellectual property (IP)

Why does it matter?

Our IP is a valuable asset and provides us with a competitive edge. Safeguarding our IP is one way we continuously improve, expand and protect our presence in the marketplace.

How does this apply to me?

Protect and enforce our IP rights at all times. Only disclose our IP for business purposes and under appropriate protections. Report any concerns regarding the misuse of our IP and be alert to potential infringement of our IP by third parties.

Wood will own the rights to all IP created during Company time, using Company materials or within the scope of our duties. Do not take Wood IP with you when you leave the Company, even if you created the IP.

For more information refer to the ***IT Acceptable Use Policy*** and your terms of employment.

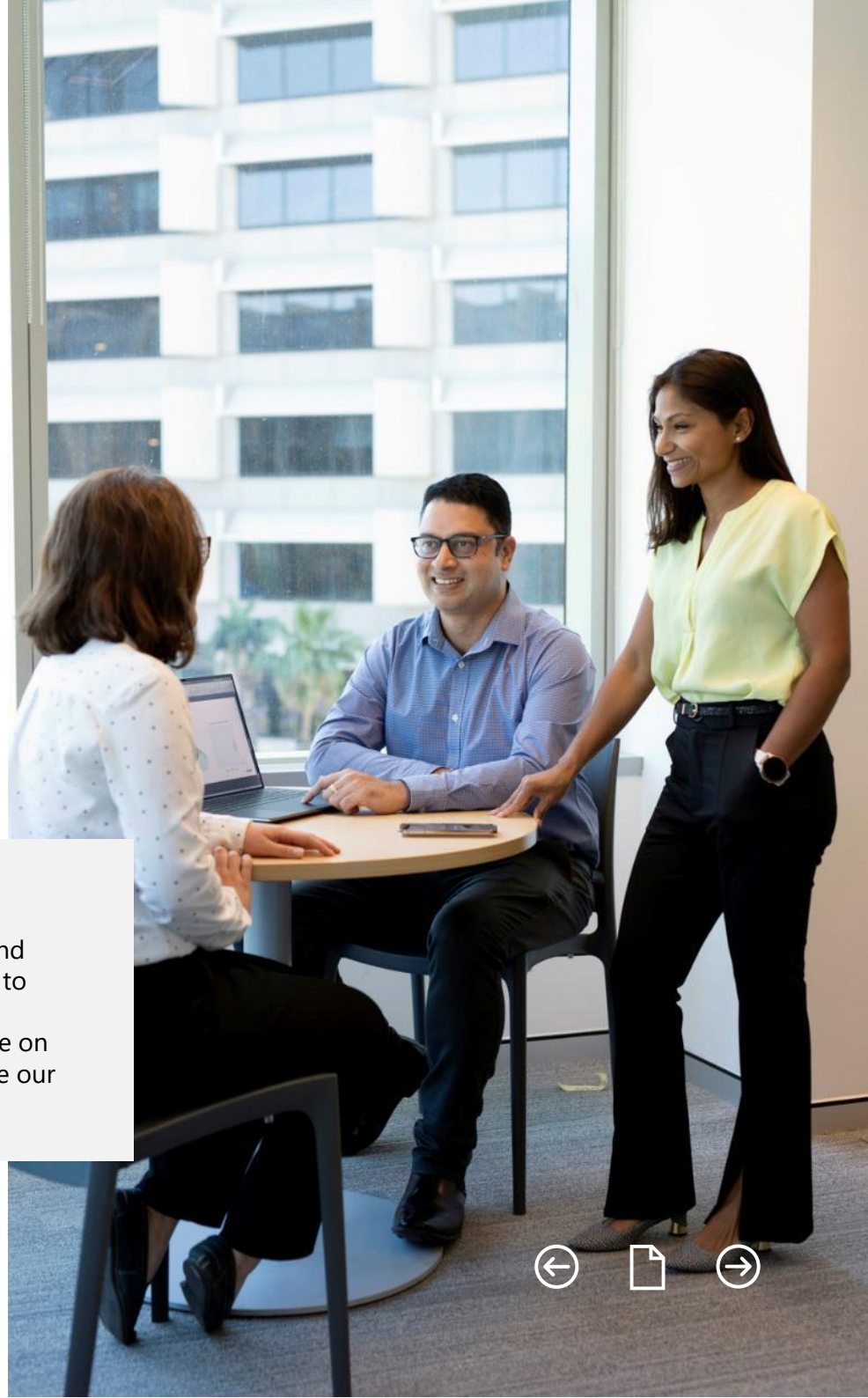
IP includes intangible property such as trade secrets, copyrights, patents, know-how, rights in inventions, trade marks (including logos and brands), database rights, design rights, and rights in domain names. IP can be both registered and unregistered.

Question

Marco, who works in Wood's marketing team, discovers that a third-party software provider is using the same brand name as software developed by Wood which is protected by both copyright and a registered trade mark. What should he do?

Answer

He should inform Legal, Ethics and Compliance who will investigate to establish whether this is an infringement of our IP and advise on potential further action to ensure our IP continues to be protected.



Physical property

Why does it matter?

We are responsible every day for the use, care and protection of physical assets belonging to Wood and our customers. This property includes equipment, vehicles, facilities, funds, customer tools and documentation.

How does this apply to me?

Be careful in how you use property belonging to Wood or our customers and use it for business purposes only while taking care to protect it against theft, damage or misuse.

Information security

Why does it matter?

The cyber threat landscape and data protection regulations are evolving rapidly and are often subject to sudden change. We must keep our confidential information, IP and all other data safe. Failure to do so can result in the loss of client trust and contracts in addition to significant fines and other losses such as reputation and share price.

A strong information security culture matters to our clients, in fact, they demand it.

How does this apply to me?

As our front-line defence, there is a need to ensure that every person inside Wood understands the importance of information security and takes personal responsibility to keep Wood and our clients' data safe.

Use our systems, services, and data ethically and in accordance with Wood policies. While occasional personal use of these systems is permitted, Wood reserves the right to monitor your use, except when prohibited by local law. This includes all data and communications transmitted by, received by, or contained in our Company email or voicemail accounts, as well as electronic documents maintained on Wood network drives, computers, laptops, and other mobile devices.

Ensure you properly secure all devices, data, and company information. At no time may you use the internet for unauthorised, illegal or unethical purposes or to download sexually suggestive or explicit material. Take care when communicating using email, and remember that electronic messages can be altered, forwarded, and stored without our consent. Never send Wood data to a personal email address.

For more information, refer to the ***IT Acceptable Use Policy and Information Security Policy Statement***.

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Social media

Why does it matter?

Social media is a powerful tool that can help us build the Wood brand, enhance the impact and reach of our communications and improve our overall reputation. However, it is essential that we use it thoughtfully, respectfully and appropriately.

How does this apply to me?

We use social media thoughtfully, respectfully and appropriately by:

- Following our ***Social Media Policy and IT Acceptable Use Policy***
- Remembering that electronic messages are permanent, transferable records—and understanding that the messages can greatly affect our reputation
- Using good judgment and considering how the content would impact the Company before posting
- Never giving the impression that you are speaking or acting on the Company's behalf via social media unless specifically authorised to do so
- Never disclosing confidential information
- Respecting others by not posting discriminatory, harassing, inappropriate or embarrassing comments or images

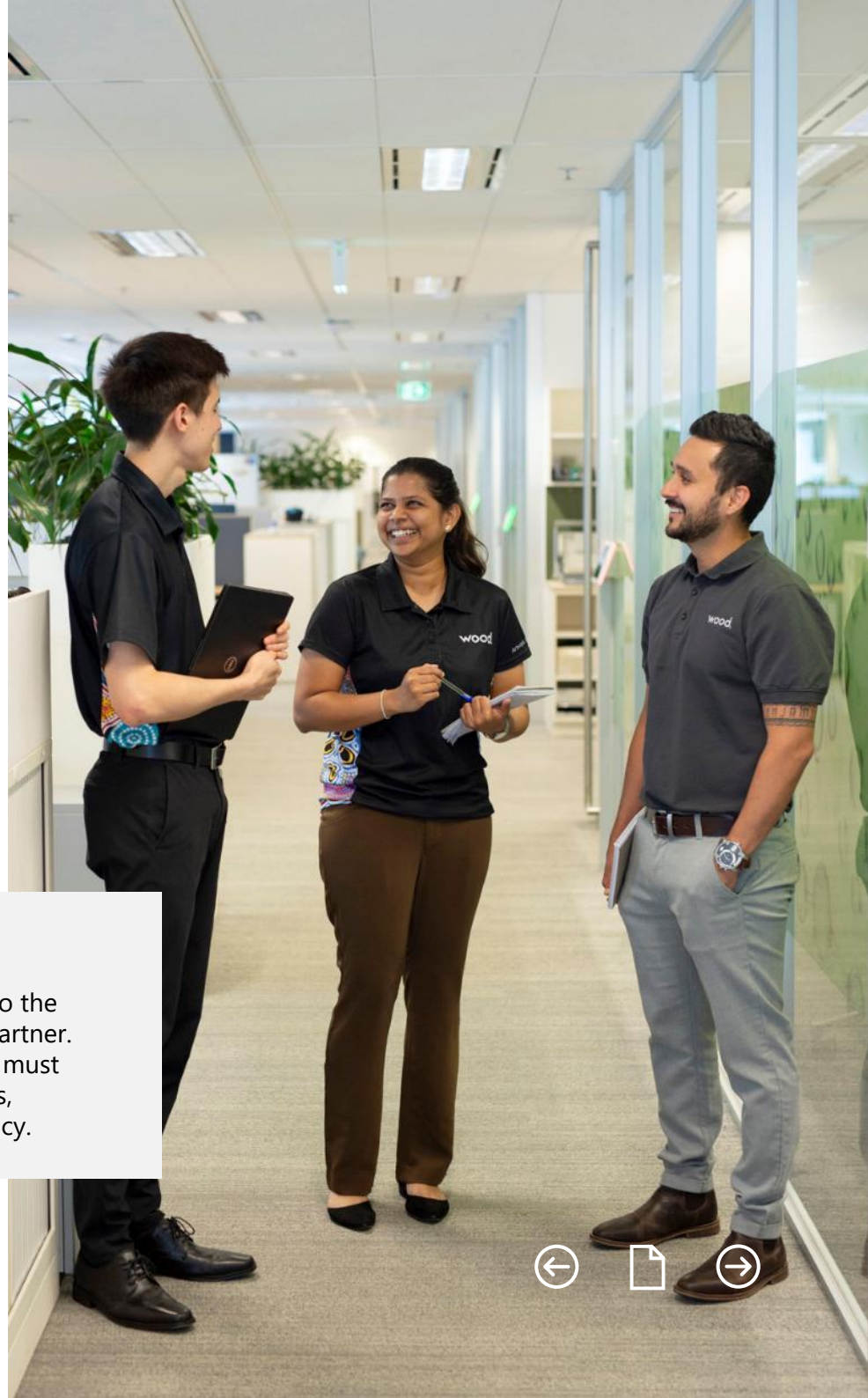
If you have questions or notice anything improper on social media from a Wood employee or concerning Wood, contact HR or Ethics & Compliance immediately.

Question

Erik, a Wood employee, was scrolling through posts on LinkedIn when he noticed a racially offensive comment from one of his co-workers. What should Erik do?

Answer

Erik should bring this matter to the attention of his HR Business Partner. Employee use of social media must comply with Company policies, including our Harassment Policy.



External communications

Why does it matter?
As a Wood employee, you may be asked to respond to questions from external organisations or individuals or could receive inquiries from the media.

To ensure we share accurate and appropriate information and in order to preserve our reputation for integrity, all external communications must be made by an authorised Company spokesperson.

How does this apply to me?
Do not make public statements or respond to the media, unless you are a designated company spokesperson authorised to speak on behalf of Wood.

For media enquiries, you should consult a member of the Wood communications team and forward any requests to **press.office@woodgroup.com**.

For requests from other parties, including external audits or government investigations, you should consult our Wood "Speak Up" resources for guidance and support in responding



Committing to honest and fair business dealings

Anti-bribery and anti-corruption

Why does it matter?
Involvement in bribery or corruption is a criminal offence in almost all countries and can have serious consequences, including significant fines for Wood and/or imprisonment and/or fines for individuals. Additionally, an allegation or conviction of bribery and corruption against Wood could result in debarment from government sector contracts and severe reputational harm, damaging Wood's relationships with its customers and business partners.

How does this apply to me?
Wood takes a zero-tolerance approach to bribery and corruption. We deal honestly with governments, our clients, our business partners, our competitors and the public. We do not offer, promise, give or receive bribes to or from public officials and private companies/ individuals. It is illegal and against Wood policy to use a third party to make or receive bribes. Immediately report to Ethics & Compliance any requests for a bribe (or that might be for a bribe) made by a public official or private company/individual for money or anything of value, including charitable or political contributions.

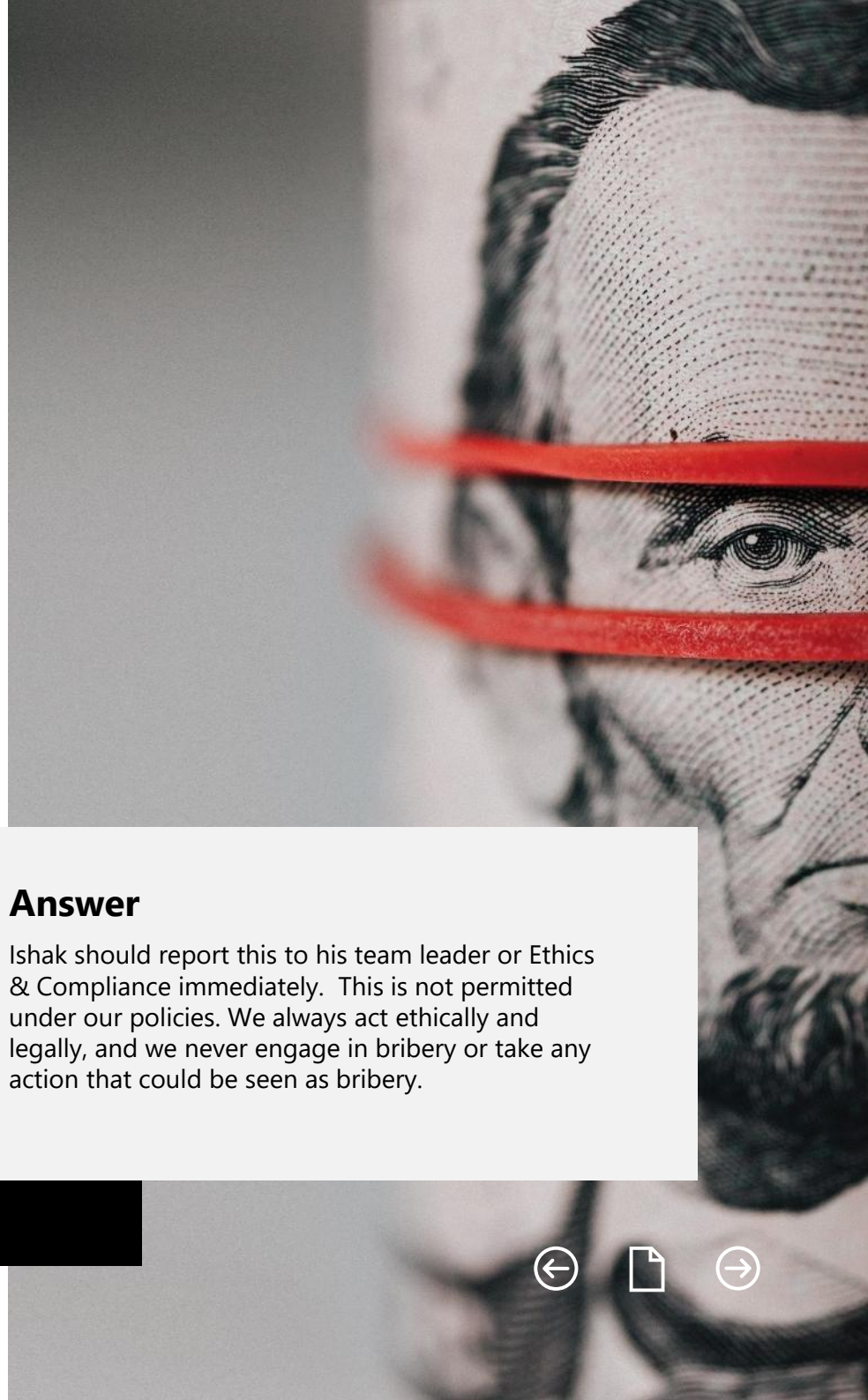
Anti-corruption laws are global and complex and the consequences of violating them are severe. Use the Wood "Speak Up" resources for guidance. For more information, review the ***Anti-Bribery and Anti-Corruption Policy*.**

A **bribe** is anything that has a value to the person receiving it — including cash, gifts, hospitality, travel, charitable donations or favours — that may be seen as an attempt to influence that person's actions or decisions, obtain or retain business, or acquire any sort of improper advantage.

Public officials include officers and employees of government agencies or departments, persons holding legislative, judicial or military positions, holders or candidates for public office and officers and employees working at state-owned entities.

Question

Ishak is working on a big project with a customer in another country, and he needs approval from a government inspector before he can move forward. To move the process along, the customer suggests that we offer the inspector a gift, like a paid trip to a nearby beach resort. Ishak is not sure if this is the right thing to do, but he doesn't want to hold up the project. What should Ishak do?



Answer

Ishak should report this to his team leader or Ethics & Compliance immediately. This is not permitted under our policies. We always act ethically and legally, and we never engage in bribery or take any action that could be seen as bribery.



Political activities and contributions

Why does it matter?

While we are free to *personally* participate in the political process lawfully, on our own time, with our own funds and equipment, Wood is politically neutral and political contributions are prohibited.

How does this apply to me?

Do not use Wood IT systems, printers, fax machines, facilities or other resources to spread a political message or support a political cause. Do not make contributions to political parties, leaders, or candidates using Wood funds or on Wood's behalf. If you choose to participate personally in political activities, make sure your participation complies with Company policies and make it clear that your personal views and actions do not represent Wood.

Political contributions include money or anything else of value, including time, provided for the purpose of promoting, supporting or influencing political activities (including lobbying of that nature), organisations or elections at any level.

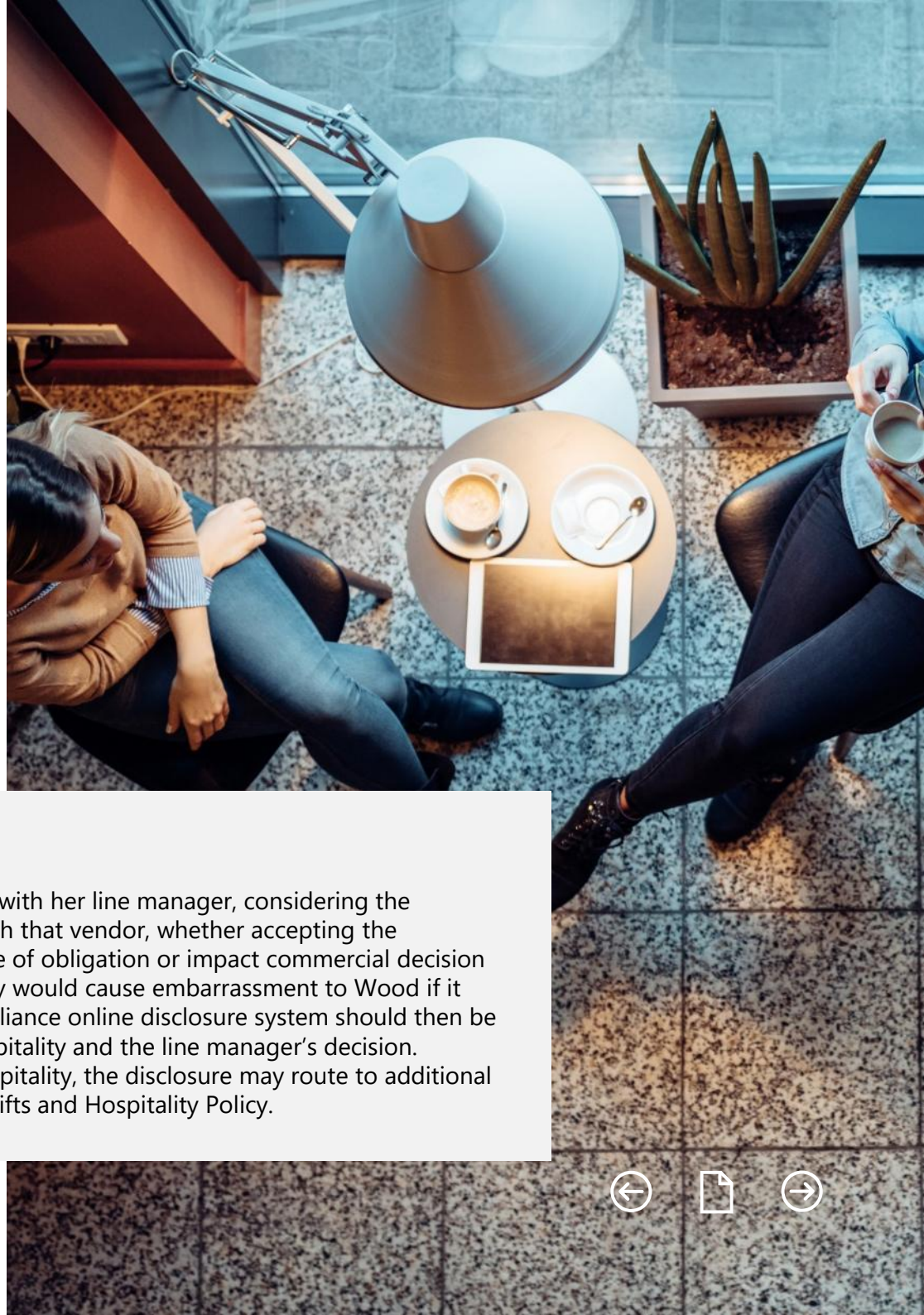
Gifts and hospitality

Why does it matter?
We build healthy, lasting relationships defined by trust and integrity, based on our quality work and ethical reputation.

Exchanging business gifts or entertainment is often a way to build or strengthen good working relationships with customers or suppliers, but we must use common sense and good judgment to ensure we do not do anything that could be seen as inappropriate or as a bribe.

How does this apply to me?
Gifts and hospitality may only be offered or received when they are ***not*** intended to create any kind of obligation on the part of the recipient or could be viewed as creating such an obligation. Remember, gifts and hospitality with public officials is an area of heightened compliance risk and is often restricted or prohibited by laws, regulations or other rules. Accordingly, the exchange of gifts and hospitality with public officials should be infrequent. We must obtain all necessary reviews and approvals for gifts and hospitality by registering them honestly, fully and accurately in the Ethics & Compliance online disclosure system.

For additional information, review the ***Gifts and Hospitality Policy*.**



Question

A vendor who works with Carol's business unit just invited her to a weekend golf trip. What should she do?

Answer

Carol should discuss the invitation with her line manager, considering the frequency of gifts or hospitality with that vendor, whether accepting the hospitality would impose any sense of obligation or impact commercial decision making and whether the hospitality would cause embarrassment to Wood if it became public. The Ethics & Compliance online disclosure system should then be used to document the offered hospitality and the line manager's decision. Depending on the value of the hospitality, the disclosure may route to additional reviewers in accordance with the Gifts and Hospitality Policy.

Third parties and commercial intermediaries

Why does it matter?

Third parties and commercial intermediaries play an important role in helping us conduct our business globally, including helping us arrange negotiations and services and representing our interests more efficiently than otherwise might be possible. However, they present a significant risk to our organization. We are ultimately responsible for the actions of anyone acting on our behalf. What they do can adversely affect our reputation and result in criminal penalties for Wood.

How does this apply to me?

Throughout the lifespan of any business relationship, Wood must monitor our business counterparts to ensure we are collaborating ethically and safely. The rules around collaborating with third parties or commercial intermediaries are strict. Wood collaborates ethically and safely with third parties and commercial intermediaries by:

- Engaging in fair and open competition.
- Ensuring that before engaging with the supplier and other third party, that the use of such a person is necessary; whether the proposed person is appropriate for the role; and whether the proposed remuneration is appropriate.
- Ensuring suppliers or other third parties are reputable and qualified.
- Ensuring that our suppliers or other third parties are chosen on the basis of an appropriate selection criteria and due diligence.
- Ensuring that the hiring of a supplier or other third party does not create an actual or apparent conflict of interest
- Evaluating and approving suppliers and other third parties in accordance with our ***Supply Chain Code of Conduct***
- Evaluating and approving commercial intermediaries in accordance with our ***Commercial Intermediaries Policy***, including obtaining management and Compliance approval



Commercial intermediaries are third parties who carry out activities on Wood's behalf, including national sponsors and processing consultants such as freight forwarders, customs brokers and visa processing consultants

Conflicts of interest

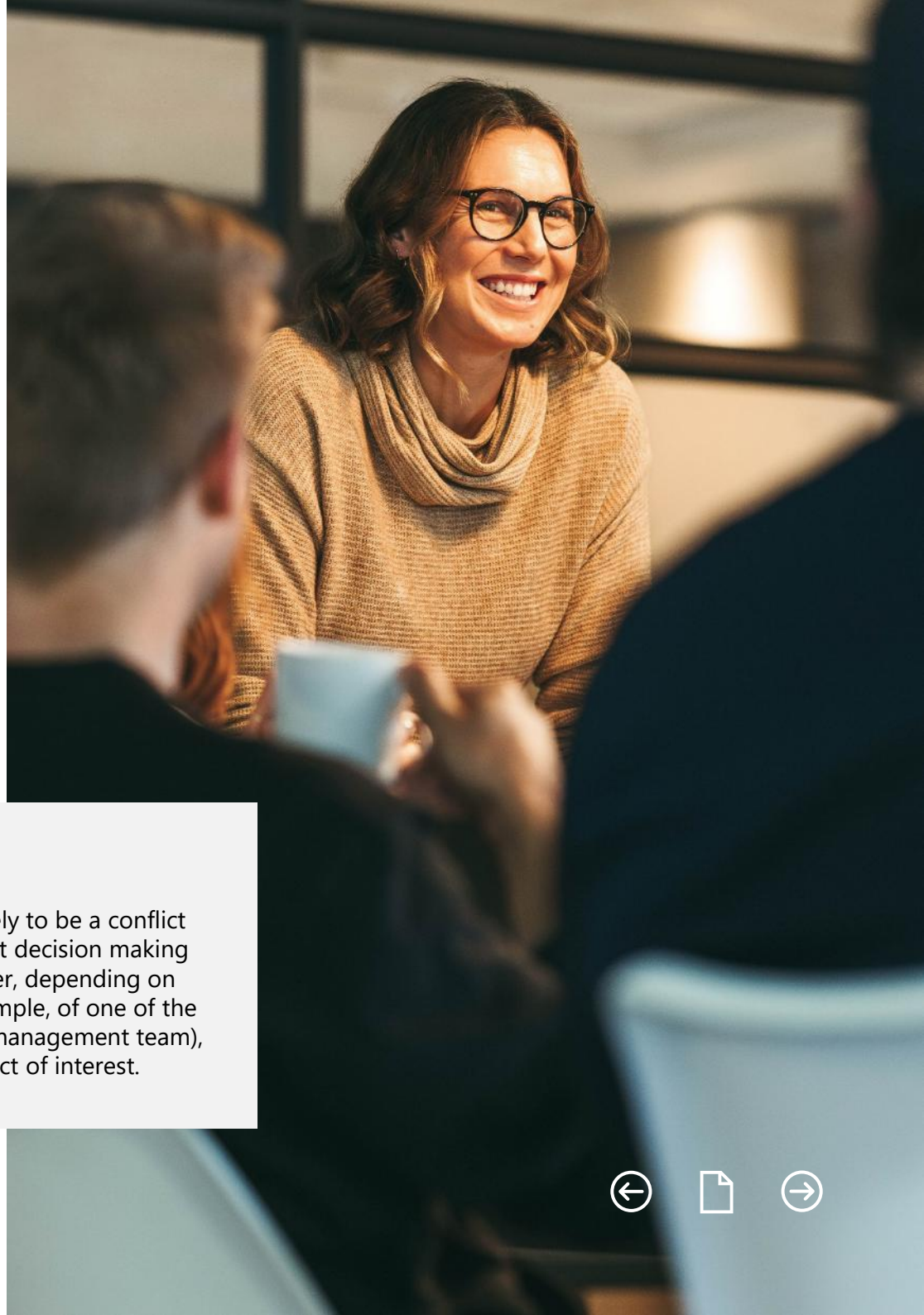
Why does it matter?

A conflict of interest can call into question Wood's management competence, commitment to ethics and ability to act in our stakeholders' best interests, harming our business and reputation as a result.

How does this apply to me?

Wood recognizes your right to engage in activities outside of your employment that are unrelated to Wood business as long as such activities do not interfere with or otherwise conflict with your obligations to Wood. You should avoid situations in which your personal interests are – or risk appearing to be – in competition with Wood's best interests or Wood's interests are – or risk appearing to be – in competition with a client's best interests.

However, having a conflict of interest is not necessarily a problem provided it is disclosed and appropriately managed in a fair and transparent manner in accordance with the ***Conflict of Interest Policy*.**



Question

Jessie and Taylor are a married couple who work in the same Wood office but in different departments with different line managers.
Is this a conflict?

Answer

Unlikely, but possibly. This is unlikely to be a conflict as neither party is involved in direct decision making relating to the other party. However, depending on their position in the office (for example, of one of the individuals was part of the senior management team), this could create a perceived conflict of interest.



Fraud

Why does it matter?

We are committed to operating our business with high integrity while never conducting or participating in dishonest or fraudulent activities. Our reputation depends on the integrity of our actions and our business dealings. Fraudulent activities are not only unethical but may also be a violation of law.

How does this apply to me?

Never engage in dishonest or fraudulent activity, such as deceit or theft, in the performance of your work at Wood. Recognising red flags is part of your job.

Examples of fraud include:

- Dishonesty and embezzlement
- Misappropriation of Wood, customer, supplier or contractor assets, including cash, supplies, equipment or any other assets
- Misuse of your position with Wood to make purchases for personal use
- Unauthorised handling, approving or reporting of business transactions
- Falsification of business documents, reports, records or financial statements

If you suspect fraudulent activity, immediately report your suspicion to Group Audit, or any of Wood's Speak Up resources.

Anti-money laundering and tax evasion

Why does it matter?

We are committed to helping in the global fight against money laundering and tax evasion. These activities are damaging to global communities around the world.

How does this apply to me?

Be diligent in your review of potential customers, suppliers and other partners who wish to do business with Wood. Look out for red flags that may signal money laundering or tax evasion activities, including:

- Customer or supplier information that cannot be verified. For example, you aren't sure where the customer gets its funds from or the ownership of a client or supplier is opaque
- Customers or suppliers that are not properly registered for tax purposes
- Customers or suppliers requesting unusually or unnecessarily complex contracting structures
- The willingness of a party to pay above market price when there is no commercial reason for doing so
- Requests for payments to be made from/to a bank account not in the name of the customer or supplier
- Requests for payments to be made to a country other than the country of residence of the customer or supplier
- Individual contractors requesting engagement with a legal entity in a country other than where they live or work
- Requests for payments in currencies other than those specified in the invoice
- Payment approval given by someone who is not a party to the contract
- Payments made through channels other than normal business relationships
- Requests to make an overpayment or to make payments in cash

If you suspect a party you are dealing with is money laundering, immediately report your suspicion to Ethics & Compliance or the Ethics Helpline.

If you suspect tax evasion activities, immediately report your suspicion to Group Tax or Ethics & Compliance.

Money laundering is the process by which people or groups try to make funds generated through criminal activity such as fraud, bribery or drug dealing look legitimate.

Tax evasion is deliberately not paying the amount of tax which is due, for example by concealing income. This should not be confused with tax avoidance which is using legal means to minimise a tax liability. Any concerns in relation to avoidance or evasion should be referred to Group Tax to determine whether there is an evasion risk.

Accurate financial books and records

Why does it matter?

We must maintain an effective system of internal accounting controls designed to ensure the making and keeping of fair and accurate financial books and records. This helps to ensure that all of our business operations are transparent and executed in accordance with management's authorisation and the assets of the business are protected.

How does it apply to me?

Everyone involved in creating, processing and recording such information in Wood's books and records is held responsible for its integrity. Our books and records must fully and accurately reflect our business transactions in accordance with our system of internal controls and applicable financial accounting standards. You must always submit appropriate contract documentation in accordance with the ***Contracting Policy*.**

If you see accounting irregularities or internal controls violations, you should report your observation to Internal Audit, Ethics & Compliance, Legal or the Ethics Helpline immediately.

Accurate business records and business communications

Why does it matter?

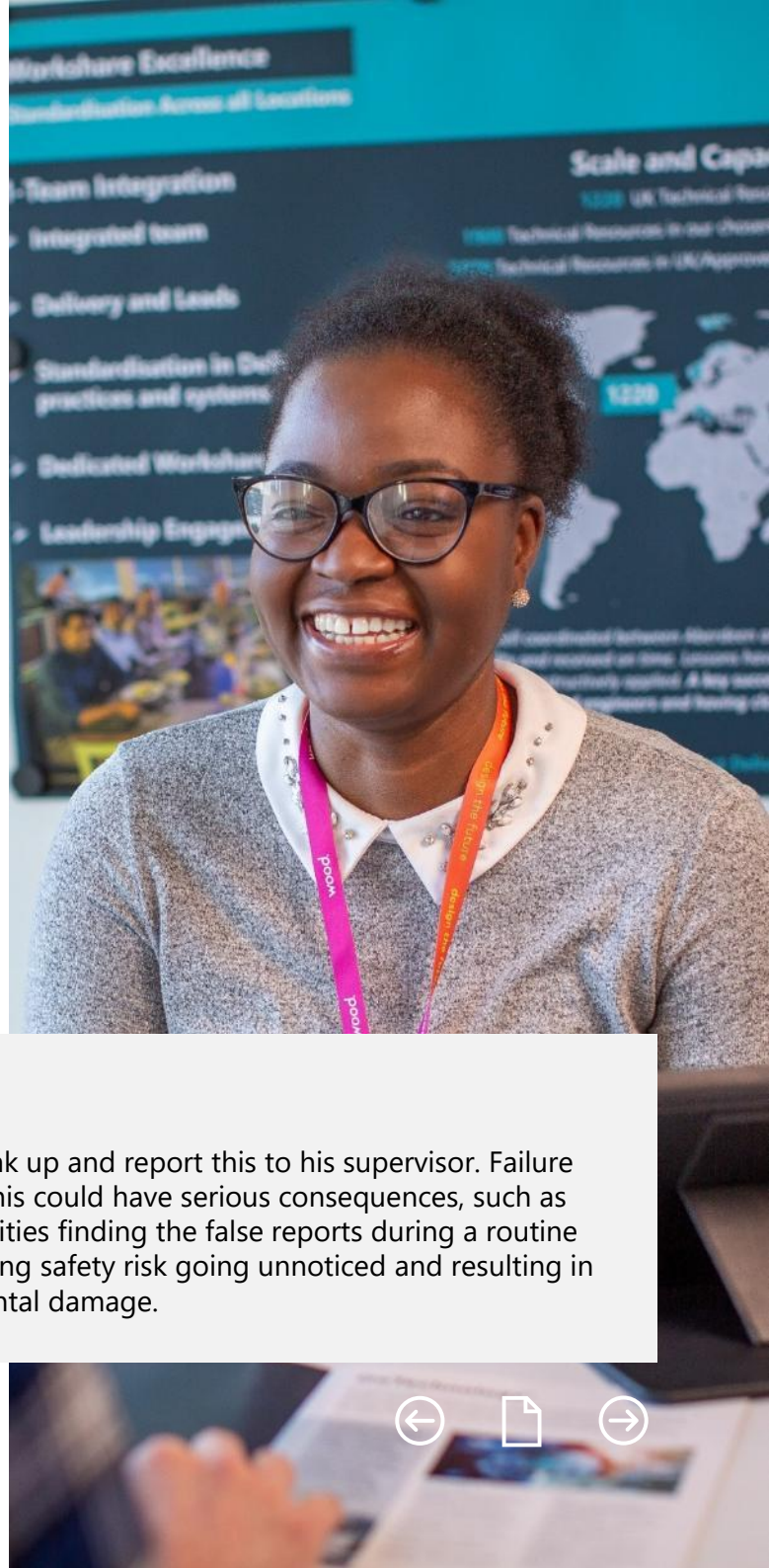
Our records management, sales, bidding and marketing practices must be accurate, honest and ethical in order to maintain healthy business relationships and protect our reputation with our customers, the public and government.

How does it apply to me?

Own your signature. Never compromise the integrity of any business record by knowingly entering an untrue or inaccurate statement. Comply with all applicable laws and regulations and preserve any relevant records in case the Company needs them for litigation, audits or investigations.

Question

Thomas, who works offshore, has witnessed his colleague, John, complete and log inspection reports for work that was never done. What should Thomas do?



Answer

Thomas should speak up and report this to his supervisor. Failure to properly report this could have serious consequences, such as government authorities finding the false reports during a routine audit, or an underlying safety risk going unnoticed and resulting in injury or environmental damage.

It is up to you to make sure every piece of data you submit into Wood's records — including personnel, time and expense documentation, and Wood or customer inspection test reports — is honest and complete. You must be truthful when representing the quality and details of Wood's products, services and capabilities.

Question

Janie, a project estimator, has recently been working on some project estimation costs. While putting together the costs, she noted some errors the customer made in the request for proposal documents that inflated the costs for the customer unnecessarily. She doubts that the customer will catch this issue, and since it will mean more income for Wood, she's not sure she should say anything.

Answer

Janie must report her discovery to the customer. We look out for the interests of our customers, and we always provide truthful and accurate information to them.



Competition laws

Why does it matter?
We are subject to various competition laws in the countries where we do business. These laws are designed to protect free enterprise and fair competition. We secure the trust of our customers and the global business community by understanding and following all applicable competition laws.

How does this apply to me?
- Ensure that you engage with our suppliers and customers lawfully in ways that reflect our values and comply with competition laws.
- Do not engage in any form of agreement or understanding with competitors to fix prices, rig bids or tenders.
- Do not agree to boycott any customer or supplier except in connection with internationally imposed government sanctions.
- Understand who is an actual or potential competitor and the restrictions on exchanging competitively sensitive information.
- Leave industry meetings or other events if competitively sensitive issues arise.

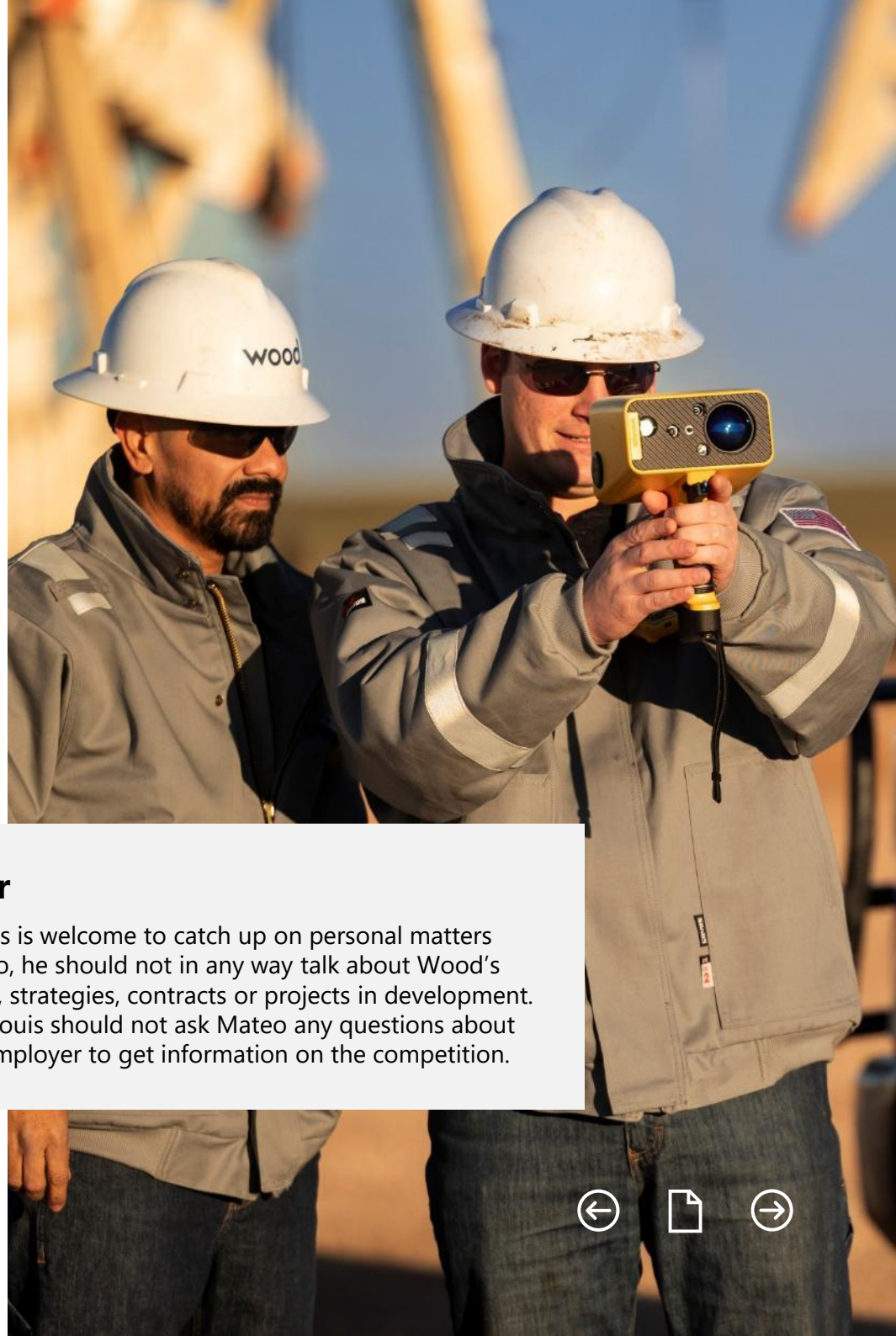
Competition laws generally prohibit price fixing, dividing territories, and agreeing to contract terms with competitors that negatively impact the market. If a competitor attempts to discuss any of these topics with you, object immediately, stop the conversation and report the incident to Ethics and Compliance or a team leader.

Competition laws can be complex, and they apply to everyone at every level of our business.

For further guidance, consult our
***Competition Law Compliance Policy*.**

Question

Louis is excited to attend the SPE Offshore Europe Conference. When he arrives, Louis sees Mateo, a former Wood colleague who now works for a competitor. Louis invites him to dinner in hopes of catching up on life and their new projects. What should Louis bear in mind?



Answer

While Louis is welcome to catch up on personal matters with Mateo, he should not in any way talk about Wood's customers, strategies, contracts or projects in development. Likewise, Louis should not ask Mateo any questions about Mateo's employer to get information on the competition.

Trade regulations

Why does it matter?
We must be aware that there are laws and regulations that place restrictions on where and with whom Wood can conduct business, as well as regulating the types of goods, software and technology Wood may export or otherwise provide access to in the course of conducting such business. Failure to comply with these complex laws can have serious consequences for Wood.

How does this apply to me?
If your work involves the export of goods, software, technology or technical data across national borders within Wood or to third parties, you must know the relevant laws and regulations. If the export involves "controlled" or "dual-use" items, it must be pre-approved in accordance with the ***Sanctions, Export Controls and Anti-Boycotts Approval and Reporting Procedure***.

You must be aware that Wood maintains a list of countries subject to various sanctions ("Watchlist Countries") and that any business in a Watchlist Country, or with entities or individuals connected with it, must be pre-approved in accordance with the ***Sanctions, Export Controls and Anti-Boycotts Approval and Reporting Procedure.***

For more information, including on US restrictions on deemed exports (release or transfer of US technology or source code to non-US persons in the US), re-exports (exports of US items from one non-US country to another non-US country), and deemed re-exports (release or transfer of US technology or source code in a non-US country to a national of a third country), please consult the ***Sanctions, Export Controls and Anti-Boycotts Policy*** or seek advice from E&C
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Question

Yanisa's manager has asked her to send technical documents for a new project to a Wood office in another country that will be jointly executing the work. Yanisa knows that certain products and data must be licensed or approved before being exported, but she's not certain this is the case with this project. What should she do?

Answer

Yanisa should not guess. She should contact Ethics & Compliance to get advice to ensure all exporting procedures are followed.

Government contracting

Why does it matter?
When national, state or local governments or governmental entities are our customers or when government funds are involved in a project, we must abide by more restrictive rules and may be subject to unique requirements not seen on commercial projects.

How does this apply to me?
It is your responsibility to make sure you are familiar with Wood's policies and procedures. You are also responsible for:

- Knowing and complying with all contract requirements.
- Ensuring all reports, certifications and statements to the government are truthful, current, accurate and complete.
- Understanding the rules when charging time and costs to a project because there are strict sanctions for failing to comply.
- Accurately recording all time and costs to benefitting projects to ensure proper billings to customers.
- Retaining records and other documentation in accordance with contract requirements
- and until the required retention period has ended.
- Using government property for specified purposes only.

It is also important to protect and not release to anyone outside our organization certain information you acquire, regardless of medium, pertaining to government projects unless authorized to do so by the responsible government official or the information is otherwise in the public domain before the date of release. Government agencies have evolving rules for safeguarding controlled unclassified information, implementing dissemination controls, and timely reporting any cyber incidents. For more information, consult the ***Government Supplement to the Code of Conduct*** or contact Legal, Ethics & Compliance with any questions.




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