



June 2024

# Global Labour & Human Rights Policy

Global Labour & Human Rights

**Global Labour & Human Rights Policy**  
**Turner & Townsend**

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<b>Point of Contact</b>	Vincent Clancy	<b>Next Review Date</b>	June 2025

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## Report

### 1 Introduction

#### 1.1 Purpose

Our people are at the heart of Turner & Townsend. They are fundamental to living our Purpose and through our work to support our clients and communities in transforming performance for a green, inclusive, and productive world.

At Turner & Townsend, we are committed to protecting and upholding the human rights of all of our people and anyone involved in or affected by the provision of our services. Turner & Townsend operates in more than 48 countries, and we are committed to respecting labour and human rights in all locations where we operate.

This policy is intended to supplement and reinforce our Business Code of Conduct and Turner & Townsend's country-specific Employee Handbooks and other policies on human rights-related issues.

#### 1.2 Legal and material scope

Turner & Townsend is dedicated to respecting the internationally recognised guidance contained in the Ten Principles of the United Nations Global Compact, the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. We align all our people initiatives globally with four UN Sustainable Development goals: Good Health & Wellbeing Quality Education, Gender Equality, Decent Work & Economic Growth Industry, Innovation and Infrastructure and Reduced Inequalities Sustainable Cities and Communities.

We are committed to following and upholding all laws and regulations in all of the countries in which Turner & Townsend operates and ensuring that all of our people are treated with dignity and respect. This is in accordance with our Code of Conduct and Turner & Townsend's values. "Stronger Together", "Bring out the Best in Everyone" and "Love a Challenge" form the basis of all our policies and practices related to people, shaping everything we do and guiding our behaviours as we work to deliver for our clients and our communities.

The present policy covers the below topics:

- Safe and secure workplace
- Working hours, conditions and compensation
- Freedom of association
- Career management and training
- Child labour, forced labour and human trafficking
- Diversity, equity and inclusion

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## 1.3 Applicability

This policy applies globally to all our entities and across all Turner & Townsend Group locations. It applies to all our staff and anyone conducting business with us or on our behalf.

Turner & Townsend is committed to working with and encouraging our stakeholders, including suppliers, customers, and other business relationships, to uphold this policy's principles and adopt similar policies within their businesses. Our Supplier Code of Conduct applies to all suppliers and is aligned with the expectations and commitments outlined in this policy.

## 1.4 Roles and responsibilities

Turner & Townsend Group's employees are responsible for reading and acting in accordance with this policy.

Management is responsible for facilitating policy implementation, and ensuring employees have access to all relevant resources.

Colleagues and internal and external stakeholders of Turner & Townsend are actively encouraged to report any concerns relating to our activities and any suspected violations of our policies, including this Labour and Human Rights Policy. We maintain reporting protocols at a global level and at country and local levels to ensure that all stakeholders have an effective mechanism to report any issues that may affect the commitments outlined in this policy. Further information regarding our grievance and reporting processes is available in our Code of Conduct.

## 2 Policy

- At Turner & Townsend, we are committed to protecting and upholding the human rights of all of our people and anyone involved in or affected by the provision of our services. Turner & Townsend operates in more than 126 countries, and we are committed to respecting human rights in all locations where we operate.
- Turner & Townsend is dedicated to respecting the internationally recognised guidance contained in the Ten Principles of the United Nations Global Compact, the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.
- In accordance with Turner & Townsend's values and Code of Conduct, we are committed to following and upholding all laws and regulations in all of the countries in which Turner & Townsend operates and ensuring that all of our people are treated with dignity and respect.
- This Policy is intended to supplement and reinforce our Business Code of Conduct and Turner & Townsend's country specific policies on human rights-related issues.

## 3 Scope

- This Policy applies globally. It applies to all of our staff and anyone conducting business with us or on our behalf.
- Turner & Townsend is committed to working with and encouraging our stakeholders, including suppliers, customers, and other business relationships, to uphold the principles in this Policy and to adopt similar policies within their businesses. Our Supplier Code of Conduct applies to all suppliers and is aligned with the expectations and commitments outlined in this Policy.

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- This Policy outlines Turner & Townsend's commitment to protecting and promoting all human rights, including women's rights and minority rights, on a global level. Whilst definitions vary depending on the governing or international body, the areas where we can make a positive contribution are outlined below.

## 3.1 Child Labour

- Turner & Townsend does not engage in or condone the unlawful employment or exploitation of children in the workplace.
- Turner & Townsend is committed to combating the exploitation of children and therefore, strictly prohibits any use of child labour. This commitment applies to all of our suppliers and other third-party arrangements.
- We will work to raise awareness internally of such exploitation and cooperate with law enforcement authorities to address any such instances of which we become aware.

## 3.2 Human Trafficking and Slavery

- Turner & Townsend respects and promotes freedom of choice and strictly prohibits slavery, servitude, forced and compulsory labour, human trafficking and prison labour.
- Turner & Townsend will not conduct business with, tolerate, or associate with any organisations or entities that condone or are engaged in the practice of coercing or imposing work with little or no freedom of choice.
- We are committed to developing, implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- We endorse the UN Guiding Principles on Business and Human Rights, and we are committed to raising awareness, within our business, regarding our responsibility and commitment to protecting human rights.
- We will cooperate with law enforcement authorities in all locations where we operate and will thoroughly investigate any such instances that come to our attention.

## 3.3 Freedom Against Prejudice and Discrimination

- Turner & Townsend unequivocally stands against violence, discrimination, prejudice or any other disrespectful communications and conduct whether motivated by race, colour, ethnicity, gender, gender identity and/or expression, sex, sexual orientation, age, disability, national origin, citizenship, ancestry, place of birth or descent, religion, union status, veteran or military status or any other protected class or characteristic protected by the applicable laws.
- Each region and country will ensure that it has the necessary policies and practices in place in order to foster a working environment that is free from misconduct, prejudice, discrimination, harassment and retaliation.

## 3.4 Safe and Secure Workplace

- Turner & Townsend is dedicated to providing a safe and healthy workplace where all of its people can thrive and succeed. This includes preventing accidents to staff, customers, suppliers and visitors. Our Health, Safety and Wellbeing Policy Statement details these commitments and our ambition of achieving world-class health, safety and welfare performance.
- We will ensure compliance with this commitment in every location and facility in which our people work.

## 3.5 Working Hours, Conditions and Compensation

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- Turner & Townsend is committed to complying with all laws and regulations regarding the wages that we pay our staff and the hours that they work.
- Our commitment to prevent the exploitation of the local workforce is expanded upon within our regional and country-specific policies. We pride ourselves as an ethical employer that continually strives to improve labour standards, respects the contributions of our staff and rewards them fairly.
- Turner & Townsend is committed to providing equal pay for equal work.
- Turner & Townsend provides appropriate training, career development and skills development to all its people.

## 3.6 Freedom of Association

- Turner & Townsend respects the rights of employees, and other staff, and complies with all local laws and regulations concerning freedom of association and collective bargaining. We expect anyone conducting business with us, or on our behalf, to do the same.

## 3.7 Indigenous Peoples

- Turner & Townsend respects the rights of indigenous communities, including land rights, in all locations where we operate. Our approach aims to be consistent with the United Nations Declaration on the Rights of Indigenous Peoples.

## 3.8 Migrant Workers

- Turner & Townsend expects all workers, including migrant workers, to be provided wages, benefits and working conditions that are fair and compliant with the local laws and legislation.
- We do not condone the confiscation and holding of workers' passports as a means of preventing them from leaving nor do we condone charging workers a fee or deposit to participate in employment or any other unfair practice.

## 4 Our Commitment

- Turner & Townsend will continue to, and will periodically, review its business practices to limit the risk of any activities or practices which could have human rights implications and may require further investigation. If any such circumstances arise, we will act promptly to investigate and address any such concerns and implement any necessary measures.
- Activities may include the implementation of controls within third party business arrangements, conducting training sessions regarding targeted "at risk" groups and issuing both internal and external communications, including publications outlining the measures Turner & Townsend have taken in the relevant reporting year.
- Turner & Townsend is committed to ensuring that this Policy, and its objectives, are communicated to our staff, our external stakeholders and any other business connection. We will take steps to embed human rights practices into our global culture as an ongoing commitment to our Purpose and Values and to being a responsible business.
- Turner & Townsend is committed to continue publishing annual Modern Slavery & Human Trafficking Statements. These Statements outline the specific steps that we have taken across our business to ensure that slavery and human trafficking are not taking place and that we meet the requirements imposed by the relevant legislation, including the Modern Slavery Act 2015 (UK) and the Modern Slavery Act 2018 (Australia).

## 5 Grievance, Remediation and Reporting

# Report

- Colleagues and internal and external stakeholders of Turner & Townsend are actively encouraged to report any concerns relating to our activities and any suspected violations of our policies, including this Labour & Human Rights Policy. We maintain reporting protocols at a global level and at country and local levels in order to ensure that all stakeholders have an effective mechanism to report any issues which may affect the commitments outlined in this Policy. Further information regarding our grievance and reporting processes is available in our Code of Conduct.
- Turner & Townsend will take prompt and decisive action to remedy any violation of this Policy.
- This Policy has been approved by our CEO and the People Board.

## 6 Policy review, sanctions and approval

### 6.1 Policy review

To ensure the continued validity and accuracy of this policy, an annual review will be undertaken. The intention of the review is to assess the need for updates and to make any necessary changes. If significant changes occur in the operations of Turner & Townsend, then a more frequent review of this document will be undertaken.

### 6.2 Sanctions

Disregarding the contents of this policy will entail consequences, which shall be determined by Management on a case-by-case basis.

### 6.3 Supporting Documents

- Health, Safety and Wellbeing policy statement
- Turner & Townsend Modern Slavery Statement
- Regional C2I route map
- Sustainability Report 2024
- Global Employee Handbooks
- Code of Conduct
- Turner & Townsend Group Sustainability Targets- Labour & Human Right

### 6.4 Targets

The Labour & Human Rights Targets of Turner & Townsend Group are developed in the 'Turner & Townsend Group Sustainability Targets- Labour & Human Rights' document. This document includes all of Turner & Townsend Group's targets that we commit to achieving on labour & human rights topics relevant to our business operations and this policy. These targets will be reviewed every year and will be replaced when achieved or the target becomes redundant based on strategic changes or updates to priorities. The objectives will be approved by the management of Turner & Townsend Group.

### 6.5 Policy approval

This policy has been approved by the management of Turner & Townsend.

# Report

A handwritten signature in black ink that reads "Vincent Clancy". The signature is written in a cursive style with a long, vertical tail on the letter 'y'.

Vincent Clancy  
**Chairman and Chief Executive Officer**