



Turner & Townsend UK Modern Slavery and Human Trafficking Statement 2024

UK Modern Slavery and Human Trafficking Statement

Turner & Townsend UK Limited

2024

1.1 Introduction

Turner & Townsend is an independent global consultancy and leader in complex programme delivery. Trusted by the world's leading organisations to solve tough challenges, positively impacting people and society. We operate in 133 offices in 49 countries worldwide. Our Purpose of transforming performance for a green, inclusive, and productive world underpins the way we do business and the work we undertake. Further information about Turner & Townsend's structure, functions and the markets within which we operate can be found at <http://www.turnerandtownsend.com>.

1.2 Purpose

Turner & Townsend is committed to operating with the highest levels of integrity, because that's the foundation we need to truly make a difference for our people, communities and clients.

The purpose of this statement is to outline Turner & Townsend's approach in the UK to comply with our obligations under the Modern Slavery Act 2015 ("the Act") and our dedication to elimination of modern slavery and human trafficking. 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 statement 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, but not least annually. Our financial year runs from May to April. This statement has been published in November 2024 and outlines our planned activity for financial year 2024 - 2025.

1.3 Our Statement

Turner & Townsend is 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. 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 and supply chains

Turner & Townsend Limited is the UK parent company of the Turner & Townsend group of companies, which is headquartered in Leeds. We have over 12,000 employees worldwide and operate in 49 countries. We operate in the UK, the Americas, Europe, Africa, the Middle East, Asia, Australia and New Zealand. Our global supply chain is comprised of contractors, service providers, and manufacturers of products used in the delivery of professional services.

On 1 November 2021, we formed a strategic partnership with CBRE Group, Inc, the world-leading commercial real estate services and investment firm listed on the New York Stock Exchange. As part of this transaction, CBRE acquired an interest in 60% of the share capital of our group holding company, Turner & Townsend Holdings Limited. We remain operationally independent under this new legal structure and there has been no change to our clients; in the way we operate, our commitment to service excellence, or the personal care we demonstrate.

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, human trafficking, or child labour.
- Ensure employment is always freely chosen. We do not tolerate forced, bonded or involuntary prison labour or schemes that give such an effect.
- Take steps to prevent modern slavery and human trafficking within their business and supply chains.
- Pay the national legal standards or industry benchmark standards for all employees as minimum.
- Provide safe and hygienic working conditions, taking adequate steps to prevent accidents and injury.

1.5 Policies 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:

- Code of Conduct
- Third-party code of conduct
- Human rights policy
- Grievance procedure
- Whistleblowing policy

Our Purpose guides our corporate responsibility strategy, which includes governance and social considerations. We are aligned to the United Nations Sustainable Development goals and United Nations Ten Principles. These are voluntary initiatives based on CEO commitments to implement universal sustainability principles.

1.6 Risk assessment and management

As a professional services company, our services are generally delivered by our global workforce, and our direct employment model provides control over the work undertaken and labour conditions under which our workforce operates. We recognise that the highest risk areas are likely to be outside of the UK and that collaboration with the supply chain is needed to prevent such issues arising. That said, our direct supply chain is relatively limited, and control is provided through various global policies as listed above. On this basis, the risk of modern slavery and human trafficking within our recruitment, employment and associated supply chain in the UK is considered minor. As part of our commitment to reduce the risk of slavery and human trafficking we undertake risk assessments to prioritise activities designed to mitigate risk. In 2024, this included incorporating modern slavery risk as a theme in our global corporate ethics and compliance risk assessment process. The outcome of these assessments included:

- Country risk: Our direct employment model means that the risks of slavery or trafficking are low in the UK. We have controls in place to manage risk in our global supply chain.
- Sector risk: The professional services industry in which we operate in is considered low risk.
- Transaction risk: As we generally directly employ our workforce the transaction risks are low.

1.7 Due diligence

We have robust recruitment practices, including 'right to work' checks for all prospective employees and we 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 provide our employees with enhanced training when appointing contractors in higher-risk locations.

1.9 Further steps

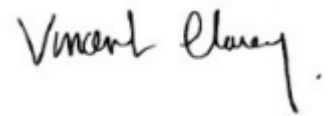
During the next financial year, we have identified the following activities to progress our commitment to the Act, we shall:

- i Prepare to become an accredited Living Wage Employer in the UK.
- ii Work with our significant UK suppliers to gain assurance that they are complying with the Act.
- iii Review our UK complaints and escalation procedures in respect of slavery and human trafficking in our supply chain. This will be inclusive of our safe-call reporting routes as outlined in our whistleblowing and ABC policies and any revisions will be published in future statements.

Report

- iv Review our standard terms and conditions for the appointment of UK based sub-consultants and include conditions covering our slavery and human trafficking supplier commitment.
- v Review the obligations and scope options for UK-based ag sub-consultants to improve of our modern slavery provisions and safeguards.

This statement dated 26th November 2024 applies to Turner & Townsend UK Limited and its UK subsidiary companies.



Vincent Clancy

Chairman & Chief Executive Officer

26th November 2024