

Turner & Townsend UK Modern Slavery and Human Trafficking Statement 2026

UK Modern Slavery and Human Trafficking Statement

Turner & Townsend UK Limited

2026

Introduction

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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 247 offices in 63 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. We are 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.

Turner & Townsend operates across three business segments globally, real estate, infrastructure and energy and natural resources. Our expertise covers asset management, cost and commercial management, digital solutions, controls and performance, procurement and supply chain, programme advisory, project management and sustainability. Further information about Turner & Townsend's structure, functions and the markets within which we operate can be found at <http://www.turnerandtownsend.com>.

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Purpose

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 January to December. This statement has been published in June 2026 and outlines our planned activity for financial year 2026.

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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.

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 approximately 23,000 employees worldwide and operate in 63 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 and construction programmes.

1.4

CBRE announced its plans to combine its project management business with Turner & Townsend in 2025. As a result, CBRE hold a 70% interest in the combined entity. The merger with CBRE's project management business, which includes a greater emphasis on principal-led delivery, impacts our exposure to modern slavery risks within the supply chain. This integration resulted in an additional circa 7,500 colleagues joining Turner & Townsend, significantly expanding our global delivery capacity. Despite these changes in ownership, we continue to operate independently, with no impact on our clients, our ways of working, or our commitment to service excellence.

1.4.1 Supply chains

It is our expectation that our suppliers:

- Comply with the provisions of the Modern Slavery Act 2015
- 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

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:

- Code of Conduct
- Third party code of conduct
- Labour and human rights policy
- Grievance policy
- Whistleblowing policy

Our Purpose guides our corporate responsibility strategy, which includes social and governance 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.

Turner & Townsend uses EcoVadis, a globally recognised ESG assessment platform, to evaluate our performance in areas such as labour and human rights, ethics, environmental impact, and sustainable procurement. In 2025, we achieved a Silver Medal placing us in the top 8% of companies assessed worldwide. This reflects our commitment to transparency, responsible sourcing, and continuous improvement.

Risk assessment and management

As a global programme manager, our Turner & Townsend agency services are predominantly delivered by our global workforce, but the project management business uses both direct employment and contracting to deliver projects and programmes.

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Our direct employment model that supports our traditional professional services enables us to maintain strong oversight and control over the nature of the work performed and the labour conditions under which our people operate. Our direct supply chain is relatively limited, and control is provided through various global policies as outlined above. However, adoption of CBRE's project management company which includes principal contracting has made our supply chain more complex. Through these contracts, our supply chain has grown significantly as has our responsibility for preventing any modern slavery and human trafficking risks. We have implemented controls through global policies and inherited oversight and controls instigated by CBRE; actively working with our parent company to build on existing infrastructure. .

Whilst the risk of modern slavery and human trafficking within our recruitment, employment and associated supply chain in the UK is considered minor, we have greater risk in our employment of workforce on behalf of clients. 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. This includes 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, however our presence globally poses a greater risk. We have controls in place to manage risk in our global supply chain.
- Sector risk: The professional services industry in which our Turner & Townsend agency side of the business operates in is considered low risk. The principal contracting merger places the business operations into the construction sector which poses a medium risk.
- Transaction risk: With those that we directly employ into our workforce, the transaction risks are low. Our principal contracting business means we have supply chain workers and employ our workforce on behalf of clients and therefore this poses a medium risk.

1.7

Due diligence

Where evidence indicates a need for further investigation, we reserve the right to assess supplier compliance with the expectations outlined in our Third-Party Code of Conduct. This may be carried out through a range of mechanisms, including self-assessments, due diligence reviews, worker voice programmes, audits, and other reporting requirements. Supplier evaluations are conducted through proportionate onboarding processes and, we have strengthened our standard terms for UK-based sub-consultants to include explicit commitments to preventing modern slavery and human trafficking.

Employees are encouraged to report concerns related to forced labour, human rights, or exploitation through our third-party confidential Speak Up service. This service is also available to third parties, including suppliers and supply chain workers, who wish to raise concerns. Reports are reviewed by our Global Head of Risk Management and escalated to the Chief Operating Officer where necessary. Turner & Townsend takes prompt and decisive action to address any violations.

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.

Workforce training

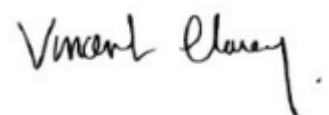
In 2025, new employees to the business were assigned our mandatory Code of Conduct E-Learning module, which outlines the principles we expect from all our people, at every level and in every location. Existing employees complete this E-Learning every rolling two years. The module includes guidance on recognising and responding to issues such as modern slavery, reinforcing our commitment to ethical conduct and human rights. Where necessary, we also provide enhanced training for employees involved in appointing supply chain workers in higher-risk locations.

Further steps

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

- Take further steps to map our supply chain, inclusive of our PjM business, to understand its structure, complexity, and potential risk areas. This includes identifying locations, and categories of goods or services that may be more vulnerable to modern slavery.
- Work with our UK-based suppliers who fall within the scope of Section 54 of the Modern Slavery Act to gain assurance of their compliance with the Act's requirements. This involves reviewing their policies and seeking evidence of progress and assurance.
- Where necessary, we will assess our purchasing practices to understand how commercial pressures, such as short lead times or cost constraints, could unintentionally contribute to modern slavery risks. If required, we will develop plans to adjust these practices and support more ethical and sustainable supplier relationships.
- Continue progress towards accreditation as a Living Wage Employer in the UK. This reflects our commitment to fair pay and decent working conditions across our operations and supply chain.
- Enhance employee awareness by reviewing and updating training and guidance materials to ensure modern slavery risks are clearly addressed, particularly for those involved in procurement and supply chain management.
- In collaboration with CBRE, undertake a double materiality assessment which assesses human rights and supply chain material issues. Utilising this work, we will be able to identify the most material human rights issues to our organisation. We will utilise CBRE's expertise and tools to further develop and action the plan we are developing through our enrolment in the UN Business and Human rights accelerator.

This statement dated 17 June 2026 applies to Turner & Townsend UK Limited and its UK subsidiary companies.



Vincent Clancy

Chairman & Chief Executive Officer

17 June 2026