

Our Third-Party Code of conduct

1. Scope and applicability

Turner & Townsend Holdings Limited and all subsidiary companies (collectively “Turner & Townsend”) 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.

We expect all Third Parties that we engage with to share the same commitment, and Our Third-Party Code of Conduct (“Third Party Code”) summarises some of our key expectations. It is not intended to represent an exhaustive list of laws and regulations applying to third parties but provide a clear high-level overview of some of our key expectations and requirements. We define ‘Third Parties’ to include:

- any non-employee, organisation or company working on Turner & Townsend’s behalf;
- any non-employee, organisation or company otherwise supplying goods and services to Turner & Townsend under a commercial agreement;
- joint venture partners;
- sub-consultants; and
- third party sponsors/agents.

Third Parties are responsible for ensuring their Directors, employees, agents, representatives, suppliers, subcontractors and other business partners understand the expectations set out in our Third Party Code.

2. How we work together

2.1 Treating others with respect and the prevention of bullying and harassment

We’re committed to creating and maintaining a working environment in which the dignity of all our people is respected, including interactions Our People have with Third Parties. We expect our working environment to be free from unwanted conduct, and for everyone to have the right to be treated with consideration, dignity and respect. Bullying and harassment have no place in our workplace and will not be tolerated.

2.2 Diversity and inclusion

Turner & Townsend is a workplace where diversity is valued and celebrated and where everyone has a voice, is empowered and has the same opportunities to be their best self. We expect all Third parties to value Diversity and Inclusion and the benefits it can bring to our business relationship.

2.3 Anti-discrimination

We do not tolerate discrimination of any kind in Turner & Townsend, including a requirement that all business related decisions are based on merit with no one being treated more or less favourably based on the grounds of any protected characteristic.

2.4 Health safety and wellbeing

Third parties are expected to provide and maintain safe and healthy working conditions, equipment and systems for their workforce and, where applicable/required, for the benefit of Our People. All Third Parties must comply with appropriate health and safety legislation, and are expected to have in place appropriate management systems (including training) wherever they operate.

Our Third-Party Code of conduct

3. How we make a difference in our communities

3.1 Human Rights

All Third Parties are responsible for avoiding the direct or indirect infringement of any internationally recognised Human Rights. Third Parties are expected to mitigate and prevent impacts that are linked to their operation, products or services including having appropriate due diligence measures in place to identify, prevent, mitigate and account for their Human Rights impacts and enable remediation. Third parties should address adverse Human Rights impacts with which they are involved when they occur.

3.2 Modern slavery

All Third Parties are required to have a clear prohibition on the use of Modern Slavery throughout their supply chain and are expected to have adequate risk based due diligence processes and management systems to minimise such risks arising and to take action if issues are identified. We expect Third Parties to work to implement best practice on Modern Slavery and Human Rights remediation and elimination, demonstrating a commitment to address Modern Slavery issues applicable to their operations.

3.3 Labour practices

All Third parties must follow all applicable laws and regulations relating at acceptable labour practices wherever they operate and through their supply chains. We also expect the following principles, informed by the International Labour Organization (ILO) core conventions, to be followed:

- **Employment is always freely chosen.** We do not tolerate forced, bonded or involuntary prison labour or schemes that give such an effect.
- **Freedom of association and the right to collective bargaining are respected.** Workers are expected to have the right to join or form trade unions of their own choosing without discrimination and to bargain collectively (unless restricted by law). Where the right to freedom of association and collective bargaining is restricted under law, we expect employers to facilitate the development of parallel means for independent and free association and bargaining.
- **Working conditions are safe and hygienic.** Adequate steps should be taken to prevent accidents and injury to health arising from or associated with the course of work. This includes minimising so far as is reasonably practicable the causes of hazards inherent in the working environment and we expect employees to be provided regular and recorded health and safety training. Facilities provided to workers should meet as a minimum their basic needs.
- **Child labour shall not be used in any form by Third Parties or their supply chain.** Third Parties should pro-actively support the transition of any child found to be performing child labour into quality education until they are no longer a child. Young persons under 18 should not be employed at night or in hazardous conditions.
- **Living wages are paid.** Wages and benefits paid for a standard working week are expected to meet, at a minimum, national legal standards or industry benchmark standards (whichever is higher). All workers are expected to be provided with written and understandable information about their employment conditions (including hours and wages) before entering employment and at the pay period concerned each time they are paid. Deductions from wages as a disciplinary measure is not expected to be permitted unless legally allowed and with the express permission of the worker concerned.
- **Working hours are not excessive.** All working hours must comply with national laws and collective agreements. We expect the following measures:

Our Third-Party Code of conduct

- Working hours, excluding overtime, should be defined by contract, and are not expected to exceed 48 hours per week;
 - All overtime should be voluntary;
 - Working hours should not exceed 60 hours in any seven-day period, unless in exceptional/legally permitted instances; and
 - Workers should be provided with at least one day off in every seven-day period (or legally allowed equivalent).
- **No discrimination is practiced.** We expect there to be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
 - **Regular employment is expected to be provided where possible.** We expect work performed must be on the basis of recognised employment relationship established through national law and practice.
 - **No harsh or inhumane treatment is allowed.** Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is expected to be prohibited.

3.4 A positive impact on our environment

Turner & Townsend are committed to minimising our impact on the environment. We expect all Third Parties to meet all relevant local and national regulations on the environment, including the implementation of an effective environmental management system that supports identifying risks, measuring and monitoring performance, and driving continual improvements to mitigate or minimise environmental impacts in their operations.

Third Parties are encouraged to consider where they might introduce measures restorative to the environment and create resilience, particularly measures toward climate resilience. We expect Third Parties to address the following:

- **Air Pollution and GHG Emissions:** Third Parties are expected to minimise air pollution and to develop and implement plans to support achievement of net zero emissions.
- **Energy Efficiency:** Third Parties are expected to use energy efficiently and consider transitioning to clean energy sources wherever possible.
- **Waste:** Third Parties are expected to put in place appropriate systems to minimise, handle, store, transport, and dispose of waste in a responsible manner that avoids leakage into the environment.
- **Water:** Third Parties are expected to use water efficiently, and for their operations to not negatively affect access to safe water for the communities in which their operations are located, both now and in the future.
- **Biodiversity and Ecosystems:** Third Parties are expected to minimise the harm of their operations on ecosystems and are responsible for assessing risks and putting in place measures to ensure that their sourcing, farming, manufacturing, or distribution activities do not compromise or damage biodiversity.
- **Chemical Management:** All global laws and regulations related to Chemical Management must be adhered to in production of all raw materials and finished product (including EU and UK REACH).

Our Third-Party Code of conduct

4. How we conduct business with integrity

4.1 Anti-bribery

We have a zero tolerance approach to any form of bribery or corruption wherever we operate, and require that all Third Parties strictly adhere to this requirement by operating in full compliance with all applicable laws and regulations. All Third Parties are required to comply with our Global Anti-Bribery and Corruption Policy or their equivalent standard. This includes a:

- Prohibition of the acceptance or offering of any form of bribery or kickback, irrespective of value;
- Prohibition on the use of facilitation payments, irrespective of whether it's permitted under local laws or customs;
- Requirement that Third parties clearly and accurately record financial transactions, in accordance with our finance processes;
- Prohibition on Third parties making any donations to political parties or charities related to political parties/individuals on behalf of Turner & Townsend; and
- Prohibition on Third Parties engaging in any form of political lobbying on behalf of Turner & Townsend.

4.2 Conflicts of interest

It's important to be able to demonstrate that the decisions and actions we take are intended to benefit our business and our clients, and are not for personal gain. For this reason, we expect Our people and Third Parties to be transparent about where potential conflicts of interest exist and whether such conflicts can be adequately mitigated. Any potential conflicts of interest by a Third Party should be disclosed to Turner & Townsend for review in accordance with our Conflicts of Interest Policy.

4.3 Gifts and hospitality

Turner & Townsend recognises that the occasional offer/acceptance of gifts or hospitality can make a valuable contribution to the development and maintenance of good business relationships. However, gifts and hospitality between Turner & Townsend and Third Parties should never create an obligation for either party, create an actual or perceived conflict of interest risk, be prohibited by law or have the potential to be interpreted as a bribe.

4.4 Fair competition

Third Parties are expected to comply with all applicable fair competition laws and regulations. Third parties must not enter into any arrangement related to our business relationship that is designed or intended to reduce or eliminate fair competition. This includes price fixing agreements, boycotting of suppliers or clients, bid rigging, cartel conduct, exclusive dealing, misuse of market power, price signalling, price fixing and working with competitors to divide the market.

4.5 Preventing tax evasion

We have a zero-tolerance approach to all forms of tax evasion under the laws of each jurisdiction in which we operate and expect all Third Parties to comply with tax obligations at all times in relation to our business relationship. This includes a requirement that Third Parties do not facilitate the tax evasion of others in any country.

Our Third-Party Code of conduct

4.6 Sanctions

We're committed to operating in full compliance with all applicable sanction regimes wherever we operate. We expect all Third Parties to comply with sanctions legislation, and where appropriate to have risk based internal procedures designed to mitigate this risk.

4.7 Privacy and data protection

Third Parties are expected to comply with all privacy laws and regulations wherever you collect, use or process personal data in connection to our business relationship. This means processing data only as authorised and directed by Turner & Townsend and as required by applicable laws and regulations. Third parties should protect personal data and confidential information against unauthorised and unlawful use, disclosure, access, loss, alteration, data and destruction.

5. How we protect our businesses

5.1 Safeguarding information

Third Parties are expected to make sure information related to our business relationship, in all formats, is protected to prevent it from being compromised. Electronic information should be treated with the same care as paper-based information. We expect all Third Parties to comply with the terms of our Third Party Information Security Policy.

Our Third-Party Information Security Policy sets out minimum policies and procedures that we expect Third Parties to maintain, including (but not limited to):

- **Information Security:** supporting framework which mandates the implementation of security controls in line with industry best-practice.
- **Incident Management:** including the obligation to notify Turner & Townsend as soon as Third Parties become aware of any security incidents affecting Turner & Townsend.
- **Network Security Management:** having controls align to industry standards, best practice and recognised security management standards, including preventing unauthorised access to Turner & Townsend Systems or information.
- **IT Disaster Recovery/Business Continuity:** setting out how Third Parties plan to restore IT and business operations in the event of an interruption to or failure of IT services.
- **Information Classification & Handling:** setting out the principles for how confidential or sensitive information is protected.
- **Human Resource Security:** expecting employees are contracted to comply with Third Party Information Security frameworks and receive appropriate induction and security awareness training.
- **Physical and Environmental Security:** expecting only authorised employees have access to locations where Turner & Townsend information is processed and associated equipment.

5.2 Use of artificial intelligence

Whilst Artificial Intelligence (AI) has the potential to improve productivity and generate business opportunities, it can equally present significant risks if not used properly. We expect all Third Parties to be transparent with their use of AI in connection to our business relationship and to only use AI in a responsible and ethical way. Third Parties are expected to always comply with all laws, regulations, commercial obligations and intellectual property rights in their use of AI.

Our Third-Party Code of conduct

5.3 Anti-Fraud

We're committed to preventing fraud of any kind and expect that Third Parties have adequate procedures to deter and prevent fraud. This includes theft, false representation, payment of false claims or invoices.

5.4 Communicating with the media

We need to make sure our communication with the media is accurate and effective. Third Parties are not authorised to communicate with the media on behalf of Turner & Townsend unless express permission has been provided by the Turner & Townsend Global Director of Corporate Communications or a member of the Turner & Townsend Global External Communications team.

6. Speak up and whistleblowing

6.1 Third party speak up, whistleblowing and grievance mechanisms

All Third Parties are expected to operate adequate speak up, whistleblowing and grievance mechanisms to enable concerns to be raised by their workers and associated persons, the investigation of concerns, and for remedial action to be taken as required. We expect all Third Parties to have a zero tolerance approach to retaliation.

6.2 Turner & Townsend speak up and whistleblowing channels

For questions or concerns about the Third Party Code, in most instances you will be able to discuss this with your Turner & Townsend representative. Turner & Townsend also provide a global speak up channel for employees and stakeholders (including Third Parties) to ask questions and raise concerns about Turner & Townsend's Third Party Code of Conduct. The speak up channel is operated by an independent company, Safecall, and reports can be made confidentially and anonymously if reporters wish to do so using the following channels:

- Email: turntown@safecall.co.uk or ethics@turntown.com
- Online reporting: www.safecall.co.uk/report
- Telephone reporting: [Telephone Numbers - Safecall Ltd](#)

7. Implementation and adoption of the Third Party Code

For the avoidance of doubt, if the Third Party Code conflicts with the terms of any Third Party contract with Turner & Townsend, and the contract term is more restrictive than the Third Party Code, the Third Party must comply with the more restrictive term of the contract.

It is the sole responsibility of Third Parties to meet the expectations and requirements of the Third Party Code. We reserve the right to monitor our Third Parties operations against the Third Party Code through self-assessment, due diligence reviews, worker voice programmes and/ or audits. We may commission third parties to audit and inspect facilities as part of these reviews.



Vincent Clancy
Chief Executive Officer
1 September 2025