

Turner & Townsend UK Modern Slavery and Human Trafficking Statement 2025

UK Modern Slavery and Human Trafficking Statement

Turner & Townsend UK Limited

2025

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 136 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. 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>.

1.2 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 2025 and outlines our planned activity for financial year 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 13,000 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 agreement, CBRE acquired an interest in 60% of the share capital of Turner & Townsend Holdings Limited, our group holding company.

Building on this relationship, CBRE announced on 24 June 2024 its plans to combine its project management business with Turner & Townsend. As a result, CBRE will 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, will impact our exposure to modern slavery risks within the supply chain. This integration will result in an additional 6,500 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 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
- 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 2024, we achieved a Gold Medal—our highest score to date—placing us in the top 5% of companies assessed worldwide. This reflects our commitment to transparency, responsible sourcing, and continuous improvement.

1.6 Risk assessment and management

As a professional services organisation, our services are predominantly delivered by our global workforce. Our direct employment model 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. We recognise that the highest risk areas are likely to be outside of the UK and within elements of our extended supply chain. Addressing these risks requires close collaboration with our supply chain partners to promote ethical practices and prevent potential issues from arising.

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. 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. 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

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 confidential Speak Up service, operated independently by Safecall. This service is also available to third parties, including suppliers and subcontractors, 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.

1.8 Workforce training

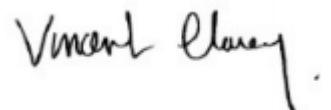
In 2024, employees were assigned our mandatory Code of Conduct E-Learning module, which outlines the principles we expect from all our people, at every level and in every location. The module includes guidance on recognising and responding to issues such as modern slavery, reinforcing our commitment to ethical conduct and human rights. Where necessary, we also provide enhanced training for employees involved in appointing 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 Take further steps to map our supply chain 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.
- ii 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.
- iii 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.
- iv 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.
- v 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.

This statement dated 24 June 2025 applies to Turner & Townsend UK Limited and its UK subsidiary companies.



Vincent Clancy

Chairman & Chief Executive Officer

24 June 2025