

September 2026

Wood Mackenzie Human Rights Policy

Version	Date	Section	Author	Description of Change
1	May 2023	All	Enterprise Risk Management & Compliance (ERM&C), Legal, and Human Resources (HR) Departments	Initial Document Creation
2	January 2024	All	ERM&C, Legal and HR Departments	Rebranding and updates related to the Speak Up Program
3	March 2024	Privacy	ERM&C and Legal Departments	Correction to Privacy section
4	September 2026	All	ERM&C and HR Departments	Periodic updates to all sections

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1. Leadership Statement

We recognise that respect for human rights is fundamental to Wood Mackenzie's purpose of transforming the way we power our planet. We recognise that a sustainable future must also be a just one.

We are committed to respecting all internationally recognised human rights, maintaining appropriate processes to identify, assess, prevent, and address potential adverse human rights impacts associated with our business activities, and continuously improving our approach.

This Human Rights Policy ("Policy") sets out our commitment to respecting the human rights of everyone who works for us, works with us, or may be affected by our business activities, and is fully endorsed by the Global Leadership Team.

*Jason Liu
Chief Executive Officer*

2. Introduction

Wood Mackenzie's bold vision is transforming the way we power our planet, and our mission includes the ambitious goal of accelerating the world's transition to a more sustainable future. Our values provide the foundation for collaboration, innovation, and responsible business conduct, including our commitment to respecting and promoting human rights in the workplace and throughout our business activities.

Wood Mackenzie's values are to be:

- Inclusive
- Trusting
- Customer Committed
- Future Focused
- Curious

'Inclusive' means we create a work environment where every individual feels valued and able to thrive, and 'Trusting' means Wood Mackenzie values transparency and integrity. In tandem, these two values remind us of our responsibility to promote human rights in our workplace and sphere of influence, including the supply chain that sustains us and the communities where we live and work.

Through its global presence, Wood Mackenzie acts in accordance with the laws and regulations applicable in the jurisdictions where we conduct business. If and where we believe such laws and regulations fall short of expectations governing internationally recognized human rights, we will nevertheless strive to conduct business in a manner consistent with our culture and values.

The foundations of this Policy are informed by various principles expressed in the Universal Declaration of Human Rights; the International Covenant on Civil and Political Rights; the International Covenant on Economic, Social, and Cultural Rights; the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at

Work; the UN Guiding Principles on Business and Human Rights; the OECD Guidelines for Multinational Enterprises; and the UN Global Compact.

This Policy complements and should be read in conjunction with other Wood Mackenzie policies available on [our public website](#), which further reflect our values and expectations as a company:

- Code of Business Conduct and Ethics
- Statement on Modern Slavery
- Statement on Inclusion Diversity & Belonging
- Supplier Code of Conduct, among others

3. Scope

This Policy applies to Wood Mackenzie Ltd and all of its affiliates and subsidiaries (hereinafter collectively called “Wood Mackenzie”), and their Staff as defined in the Definition section of this Policy. We further seek to promote respect for human rights and the commitments contained herein with and among our business partners and other stakeholders.

We further expect our suppliers, business partners, and other third parties acting on our behalf to uphold standards equivalent to those in this Policy, as set out in our Supplier Code of Conduct. Where a supplier or business partner falls short, our preference is to work with them on a time-bound corrective action plan; where Remediation is refused or fails, we reserve the right to terminate the relationship.

4. Definitions

- **Adverse Human Rights Impact:** an impact that occurs when an action or omission removes or reduces the ability of an individual to enjoy their human rights.
- **Business Partners:** the parties with which Wood Mackenzie has a direct or indirect business relationship, including suppliers, contractors, joint venture partners and other third parties acting on its behalf or in its Value Chain.
- **Grievance Mechanism:** Any routine, formalised process through which individuals, workers, or communities can raise concerns or complaints about actual or potential adverse human rights impacts and seek remedy, including Wood Mackenzie’s Speak Up Platform. Wood Mackenzie’s Grievance Mechanism is designed to meet the effectiveness criteria of Principle 31 of the UN Guiding Principles on Business and Human Rights.
- **Human Rights:** the fundamental rights and freedoms to which all people are entitled, understood at a minimum as those set out in the International Bill of Human Rights (the Universal Declaration of Human Rights and the two International Covenants) and the principles concerning fundamental rights in the ILO Declaration on Fundamental Principles and Rights at Work.
- **Human Rights Due Diligence:** the ongoing process by which Wood Mackenzie identifies, prevents, mitigates and accounts for how it addresses its actual and potential adverse human rights impacts, consistent with the UN Guiding Principles on Business and Human Rights.
- **Modern Slavery:** all forms of slavery, servitude, forced, bonded, indentured or compulsory labour, and human trafficking. Please refer to the [Wood Mackenzie Statement on Modern Slavery](#) for more details.

- **Personal Data** means information relating to an identified or identifiable individual, consistent with Wood Mackenzie's Global Privacy Policy.
- **Remediation or Remedy:** The process of providing a remedy for an adverse human rights impact, and the substantive outcomes that can counteract or make good the impact. Remedies may take a range of forms, including apologies, restitution, rehabilitation, financial or non-financial compensation, and measures to prevent recurrence.
- **Salient Human Rights Issues:** The human rights at risk of the most severe negative impact through the company's activities and business relationships.
- **Staff** means Wood Mackenzie's directors, officers, and employees (whether full-time, part-time, temporary, or contingent).
- **Supplier** means any third party, firm, or individual providing a product or service to Wood Mackenzie, together with the parties listed in the Scope section and their owners, officers, employees, and downstream contractors and subcontractors.
- **Value Chain:** The full range of activities, entities, and relationships involved in creating and delivering Wood Mackenzie's products and services, both upstream (including suppliers and their subcontractors) and downstream, whether or not Wood Mackenzie has a direct contractual relationship with each party.

5. Governance and Accountability

This Policy is owned by the Senior Vice President, Head of Legal, Compliance and GSSR, with day-to-day implementation overseen by the Enterprise Risk Management & Compliance ("ERM&C") Department in collaboration with Human Resources ("HR") including its Environmental, Social, and Governance ("ESG") function, Legal, Procurement, Privacy, and other relevant functions.

The Global Leadership Team is accountable for the integration of human rights considerations into business strategy and operations.

The Global Leadership Team reviews human rights performance, salient risks, trends, and progress against the objectives of this Policy at least annually.

6. Objectives and Targets

Wood Mackenzie has set the following measurable objectives against which progress is reviewed by the Global Leadership Team at least annually:

Indicator	Target	Owner
Human rights & modern slavery training and completion	100%	ERM&C and HR
Policy attestation	100%	ERM&C
Suppliers screened for sanctions and adverse media as part of onboarding and ongoing monitoring activities	100% (Daily)	ERM&C

Speak Up reports acknowledged	Within 5 business days	ERM&C and other relevant departments
Speak Up investigations concluded	Within 60 days (average)	ERM&C and other relevant departments
Substantiated cases with Remediation actioned	100%	ERM&C
Work-related fatalities	0	Global Safety, Security and Resilience (GSSR)
Gender Pay Gap Reporting	Published annually	HR

7. Monitoring, KPIs and Public Reporting

Wood Mackenzie monitors implementation of this Policy through the key performance indicators set out under Objectives and Targets. Performance is reviewed by ERM&C and ESG on an ongoing basis and reported to the Global Leadership Team and, where appropriate, the Board or relevant governance committees, at least annually.

We report publicly on our human rights approach and performance, including through our annual Modern Slavery Statements and ESG report which, in future years, will cover training completion, supplier due diligence coverage, and Speak Up numbers (number of reports received, substantiated, and remediated without compromising confidentiality).

8. Commitments

The Policy evidences the following commitments:

- **Antidiscrimination and Fair Treatment:** Wood Mackenzie's policies for recruitment, advancement, and retention of Staff forbid discrimination on the basis of race, ethnicity, religion, colour, national origin, citizenship, sex, gender identity and/or expression, sexual orientation, marital status, veterans' status, age, disability/accessibility, and any other criteria prohibited by law. Our policies are designed to ensure that Staff are treated and treat each other fairly and with respect and dignity. In keeping with this objective, conduct involving discrimination or harassment of others will not be tolerated.
- **Career Management and Training:** We are committed to supporting the professional development of our people through access to training and skills development, regular performance feedback and appraisal, and transparent access to internal opportunities and career progression.
- **Child Labour:** We are committed to ensuring through appropriate diligence that child labour is not used in our operations or, so far as reasonably practicable, within our supply chain.
- **Communities:** We respect and support the communities where our Staff work and live. Wood Mackenzie is committed to being a responsible citizen through our employment and procurement practices; embracing a thoughtful approach to environmental stewardship that minimizes greenhouse gas emissions associated with

our operations; and supporting a philanthropy program that integrates financial resources, business expertise, and volunteering to assist organizations addressing issues of global and local importance.

- **Compensation and Benefits:** We are committed to ensuring that fair and equitable compensation and benefits are paid to our Staff, commensurate with the work performed, and that our compensation and benefits practices conform with all applicable laws and regulations.
- **Employment Status:** We are committed to employing workers who are legally authorized to work in their location. We acknowledge that it is our responsibility to validate Staff's eligibility-to-work status through appropriate diligence.
- **Employment/Labour Practices:** All work performed for Wood Mackenzie must be undertaken voluntarily. We prohibit the use of any form of slave, forced, bonded, indentured, or involuntary labour. We will not aid, abet, or be complicit in human rights abuses and will take appropriate steps to prevent, identify, and address human trafficking and exploitation associated with our operations and supply chain. We do not retain workers' government-issued identification, passports, or work permits as a condition of employment. Workers shall not be charged recruitment fees or related costs to obtain or keep employment, and where such fees or costs are identified, we will work to ensure appropriate Remediation. We recognise that certain workers may face heightened vulnerability to exploitation or abuse and seek to apply appropriate safeguards through our employment and supplier management practices.
- **Fair Wages and Compensation:** We strive to maintain compensation practices that are fair, equitable, and compliant with applicable laws, taking account of market conditions and living wage principles where appropriate. We monitor pay equity, including gender pay, and publish gender pay gap reporting where required.
- **Freedom of Association and Social Dialogue:** We are committed to respecting the rights of workers to associate or not associate with any groups, to organise, and to bargain collectively, as permitted by and in accordance with all applicable laws and regulations. Workers will not be subject to retaliation, intimidation, discrimination, or adverse treatment for exercising lawful rights of freedom of association and collective bargaining. We are committed to constructive social dialogue with Staff and their chosen representatives.
- **Privacy and Confidentiality:** We are committed to protecting the personal data of our Staff and stakeholders, maintaining its integrity and confidentiality, complying with applicable data protection laws, and collecting and using personal data only for legitimate purposes.
- **Working Conditions and a Safe Workplace:** We are committed to ensuring that Wood Mackenzie complies with all laws and regulations governing Staff health and safety in the jurisdictions where we operate. In furtherance of this commitment, we will: monitor and address workplace and travel-related risks; provide awareness and training to Staff on safety, health, and security issues appropriate to their location and job category; and distribute protective equipment and other safety resources when warranted by the nature of the work being performed. We are also committed to providing all Staff with the right to rest, access to water, toilets, and vacation/holiday in accordance with the legislation of the jurisdictions where they work.
- **Working Hours:** We are committed to reasonable working hours consistent with applicable law and ILO standards, including limits on excessive overtime, and to respecting our Staff's right to rest and, where recognised under applicable law or company policy, disconnect from work outside normal working hours.
- **Zero Tolerance for Harassment:** Wood Mackenzie has a zero-tolerance policy for harassment and intimidation of any kind. No form of physical, sexual, psychological, or verbal harassment or abuse shall be

tolerated. Wood Mackenzie's zero-tolerance policy covers all forms of harassment, including sexual harassment and unwelcome verbal, visual, physical, or other conduct that creates an intimidating, offensive, or hostile work environment. We are committed to ensuring a work environment in which our Staff feel valued and respected for their contributions.

9. Honouring Our Commitment

9.1 Communication and Training

All Wood Mackenzie Staff shall receive a copy of this Policy and are required at the time of hire or retention, and annually thereafter, to acknowledge receipt of the Policy and to confirm that they have read it and understand it.

All Staff are required to complete risk-based and role-appropriate training at the time of hire and periodically thereafter on topics including diversity and inclusion, data protection, modern slavery, and other human rights-related topics as determined by Wood Mackenzie.

9.2 Supplier Code of Conduct and Due Diligence Process

Provisions consistent with this Policy are also included in Wood Mackenzie's Supplier Code of Conduct (the "Code"), which requires suppliers to complete an annual Supplier Attestation acknowledging their ongoing compliance.

As part of Wood Mackenzie's third-party credentialing process, we contract with a leading risk and compliance organisation to monitor suppliers that are subject to ongoing risk monitoring under our Third-Party Risk Management framework. The organisation scans content daily from government bulletins and news sources in our countries of operations, as well as in high-risk geographic areas, to identify instances where such suppliers may have been implicated in unlawful activity, including human rights abuses, modern slavery, or human trafficking.

High-risk suppliers may be identified on the basis of geography, sector, service type, adverse media findings, sanctions screening results, modern slavery risk indicators, human rights risk indicators, or other risk factors identified through Wood Mackenzie's supplier due diligence process.

Wood Mackenzie reviews each potential violation and takes appropriate action. Where issues are identified, our preference is to engage the supplier in a time-bound corrective action plan and to verify its completion; where the supplier is unwilling or unable to remediate, we will terminate the business relationship. Suppliers identified as higher risk are subject to enhanced due diligence and ongoing monitoring, as appropriate.

10. Human Rights Due Diligence

Consistent with the UN Guiding Principles on Business and Human Rights, Wood Mackenzie operates an ongoing human rights due diligence process to identify, prevent, mitigate and account for how we address actual and potential adverse human rights impacts across both our operations and our Value Chain. This process comprises:

- **Identify and Assess:** We conduct a human rights risk assessment at least every two years, and when entering new markets or business lines, to identify our Salient Human Rights Issues. Based on our business model, our current assessment indicates that salient issues include data privacy and responsible data use; labour rights in our extended supply chain (including IT hardware, facilities, and outsourced services); working hours and Staff wellbeing; and non-discrimination.

- **Integrate and Act:** Findings are integrated into relevant functions and processes, including procurement, HR, information security, and enterprise risk management, with mitigation actions assigned to accountable owners.
- **Track Effectiveness:** We track the effectiveness of our responses using the key performance indicators set out in this Policy.
- **Remediate:** In the event that Wood Mackenzie determines that it has caused or contributed to an adverse human rights impact, we will consider and implement appropriate remedial measures consistent with applicable law, the circumstances, and our responsibilities.
- **Communicate:** We report where appropriate on our approach and performance as described under Monitoring, KPIs and Public Reporting below.
- **Stakeholder Engagement:** We seek the views of potentially affected stakeholders, including Staff, suppliers, external experts and community groups, to inform our assessment of salient issues.

11. Reporting Potential Violations

Wood Mackenzie is committed to maintaining a culture where everyone feels safe to raise concerns without fear of retaliation. We encourage all Staff to speak up about any suspected violations of laws, regulations, this Policy, or other company policies.

Anyone who suspects that a violation of this Policy or the law has occurred should report it immediately.

- **Staff:** Staff should make such a report to Wood Mackenzie management or use the Speak Up Platform, described below.
- **External Stakeholders:** External stakeholders should make such a report using Wood Mackenzie's Speak Up Platform, described below.

Consistent with the effectiveness criteria of UNGP 31, we are committed to operating a Grievance Mechanism that is legitimate, accessible, predictable, equitable, transparent, rights-compatible, and a source of continuous learning. We will acknowledge reports within 5 business days and aim to conclude investigations within 60 days on average, keeping reporters informed of progress where possible.

Where investigations substantiate that Wood Mackenzie has caused or contributed to harm, we will consider and implement appropriate corrective and remedial measures consistent with applicable law and the circumstances. Retaliation of any kind against any person — Staff or external stakeholder — for raising a concern in good faith, participating in an investigation, or complying with this Policy is strictly prohibited.

11.1 Speak Up Platform

The Speak Up Platform is operated and maintained by an independent third-party provider. It provides Wood Mackenzie stakeholders with a confidential mechanism to report concerns, including alleged human rights abuses, financial misconduct, bribery and corruption, privacy concerns, and other potential violations of law or company policy.

Reports may be submitted online or by telephone, 24/7/365, in multiple languages, and may be made anonymously where permitted by law.

Concerns may be reported through:

- [The Speak Up Platform](#) (web-based reporting, available 24/7/365);
- The Global Speak Up Hotline (country-specific telephone numbers, available 24/7/365); or
- Direct contact with management, Legal, HR, ERM&C, or another appropriate company representative.

We are committed to:

- Maintaining the highest possible level of confidentiality when handling reports. In circumstances where limited disclosure is necessary to conduct a fair investigation or comply with legal or regulatory obligations, we will communicate appropriately and manage all information with care.
- Investigating all concerns raised in good faith in a fair and timely manner; and
- Prohibiting retaliation against anyone who reports a concern or participates in an investigation in good faith.

Further information regarding reporting channels, investigation procedures, confidentiality, and non-retaliation protections can be found in the [Wood Mackenzie Speak Up Policy](#).

11.2 Enforcement

Wood Mackenzie will investigate any potential breach or violation of this Policy. Wood Mackenzie reserves the right to report incidents to local authorities where warranted.

Disciplinary action taken by Wood Mackenzie will be commensurate with the violation and consistent with local requirements, which may include immediate dismissal or termination of a business relationship. Retaliation against a Staff for complying with this Policy or making a whistleblower complaint is strictly prohibited.

12. Policy Review

This Policy is reviewed at least annually by ERM&C and HR departments, and additionally upon material changes to our business, regulatory environment, or salient human rights risks. Next scheduled review: May 2027.

Policy Governance

Policy Owner:	Louise Onikoyi, Senior Vice President, Head of Legal, Compliance & GSSR
Applicable:	All Wood Mackenzie Staff
Classification:	External Policy
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