



# Human Rights Policy

## Introduction

This Policy embodies core values of Wood Mackenzie – first and foremost, respect for the individual – and is supported by the culture of our workplace, which celebrates a diversity of geography, peoples, and experiences.

In committing to this Policy, we acknowledge our responsibility to respect and uphold human rights in our workplace and sphere of influence, including the supply chain that sustains us and the communities where we live and work.

As a global company, Wood Mackenzie has always been committed to acting 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.

This Policy complements and should be read in conjunction with other Wood Mackenzie policies ( available [here](#) ) that reflect our beliefs as a company:

- Code of Business Conduct and Ethics,
- Statement on Modern Slavery,
- Statement on Racial Equity and Diversity, and
- Supplier Code of Conduct, among others.

## Scope

This Policy applies to Wood Mackenzie Ltd and all of its affiliates and subsidiaries (hereinafter collectively called "Wood Mackenzie"), and their employees (including full and part-time), temporary workers, and contractors. We further accept the obligation to honor and promote human rights and the commitments contained herein with and among our business partners and other stakeholders.

## Commitments

The Policy evidences the following commitments:

- **Antidiscrimination and Fair Treatment:** Wood Mackenzie's policies for recruitment, advancement, and retention of employees forbid discrimination on the basis of race, ethnicity, religion, color, national origin, citizenship, sex, gender identity and/or expression, sexual orientation, marital status, veterans status, age, or disability, and any other criteria prohibited by law. Our policies are designed to ensure that employees 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.
- **Child Labor:** We are committed to ensuring through appropriate diligence that underage labor is not employed in our operations.
- **Communities:** We respect and support the communities where our employees 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 employees, 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 and facility. We acknowledge that it is our responsibility to validate employees' eligibility-to-work status through appropriate diligence.
- **Employment/Labor Practices:** Employment at Wood Mackenzie is voluntary. We prohibit the use of any form of slave, forced, bonded, indentured, or involuntary labor. We will not aid, abet, or be complicit in human rights abuses or tolerate human trafficking or exploitation within our supply chain. We do not retain employees' government-issued identification, passports, or work permits as a condition of employment.
- **Freedom of Association:** We are committed to respecting the rights of workers to associate or not associate with any groups, as permitted by and in accordance with all applicable laws and regulations.
- **Privacy and Confidentiality:** We are committed to safeguarding the integrity, confidentiality, and responsible use of data.
- **Working Conditions and a Safe Workplace:** We are committed to ensuring that Wood Mackenzie complies with all laws and regulations governing employee health and safety in the jurisdictions where we operate. In furtherance of this commitment, we will: monitor and address workplace and travel-related risk; provide awareness and training to employees on safety, health, and security issues appropriate to their location and job category; and distribute protective gear and other safety equipment when warranted. We are also committed to providing all employees with the right to rest, access to water, toilets, and vacation/holiday in accordance with legislation of the jurisdictions where they work.

- **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 employees feel valued and respected for their contributions.

## Honoring Our Commitment

### Communication & Training

All Wood Mackenzie employees shall receive a copy of this Policy and are required at 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 employees are required to complete training at time of hire and annually thereafter on unconscious bias, workplace diversity, data protection, and modern slavery.

### Supplier Code of Conduct & 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 compliance.

As part of Wood Mackenzie's third-party credentialing process, we contract with a leading risk and compliance organization to monitor whether our current and prospective Tier 1 suppliers are subject to sanctions. The organization 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. Wood Mackenzie reviews each potential violation, taking appropriate action when necessary, including termination of the business relationship.

## Reporting Potential Violations

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

- **Employees:** employees should make such a report to Wood Mackenzie management or use Wood Mackenzie's Whistleblower Platform, described below.
- **External stakeholders:** external stakeholders should make such a report using Wood Mackenzie's Whistleblower Platform, described below.

### Whistleblower Platform

The Whistleblower Platform is operated and maintained by an independent third-party service. It provides Wood Mackenzie's stakeholders a way to safely report alleged human rights abuses, financial misconduct, bribery and corruption, data privacy, as well as other potential improprieties. The Whistleblower Platform exists to ensure confidential reporting without fear of retaliation. Whistleblower reports can be made anonymously where permitted by law [online](#) or by [phone](#) 24/7/365 in local languages across the globe. A detailed process of how we handle such concerns can be found in our [Whistleblower Policy](#).

### 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 an employee for complying with this Policy or making a whistleblower complaint is strictly prohibited.