

Wood Mackenzie Supplier Code of Conduct

March 2024

Revision History

Version	Date	Section	Author	Description of Change
1	February 2023	All	ERM&C and Law Department	Initial Document Creation
2	March 2024	All	ERM&C and Law Department Legal, Procurement	Rebranding and updates related to the Speak Up Program

Purpose

This Code of Conduct applies to Wood Mackenzie Ltd and all of its affiliates and subsidiaries (hereinafter collectively called “Wood Mackenzie”). Wood Mackenzie works diligently to protect the single most important asset of its business: integrity. Integrity underlies the professional expertise of its team, the quality of its analytics and services, and its reputation to thousands of customers throughout the world. Suppliers likewise have a duty to demonstrate the highest standards of business conduct, integrity, and adherence to applicable laws and regulations. The Wood Mackenzie Supplier Code of Conduct (Code) sets out the basic principles and expectations for Suppliers. Suppliers are required to act in accordance with the Code – operating with its principles, and periodically checking to see if any updates or changes have been made to the Code.

The Code does not constitute an employment contract, and nothing contained herein is intended to convey any rights, actions, or remedies to Suppliers or to create an employment relationship between Wood Mackenzie and the Supplier or the Supplier’s employees. In addition to the terms of a Supplier’s contract with Wood Mackenzie, the following provisions set forth the behavioural expectations governing the business relationship.

Scope

A Supplier is any third party, firm, or individual that provides a product or service to Wood Mackenzie. The following persons, entities, and organizations (collectively referred to as Suppliers) are covered by this Supplier Code of Conduct and thereby subject to its provisions:

- Suppliers, vendors, consultants, agents, brokers, distributors, facilitators, contractors, temporary workers, and any other third parties providing services to Wood Mackenzie.
- The owners, officers, directors, employees, and downstream contractors and subcontractors of these organizations and entities

Protection of Human Rights

Wood Mackenzie supports the protection of internationally proclaimed human rights. Wood Mackenzie will not engage in business or supplier relationships that make Wood Mackenzie complicit in human rights abuses. Wood Mackenzie expects its Suppliers to conduct their activities in a manner that respects human rights as set out in the United Nations Universal Declaration of Human Rights. In addition, Suppliers shall uphold the following labor practices:

- **Freedom of Association:** Suppliers shall respect the rights of workers to associate or not associate with any groups, as permitted by and in accordance with all applicable laws and regulations.
- **Employment Status:** Suppliers shall employ workers who are legally authorized to work in their location and facility. Suppliers are responsible for validating employees’ eligibility-to-work status through appropriate documentation.
- **Employment Practices:** Suppliers employ all employees on a voluntary basis and shall not use any form of slave, forced, bonded, indentured, or involuntary labor. Suppliers shall not engage in human trafficking or exploitation and shall not retain employees’ government-issued identification, passports, or work permits as a condition of employment.

- **Zero Tolerance for Harassment:** Wood Mackenzie has a zero-tolerance policy for harassment 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. Suppliers shall create a work environment in which employees feel valued and respected for their contributions.
- **Anti discrimination and Fair Treatment:** Wood Mackenzie is an equal opportunity employer. Suppliers that work with Wood Mackenzie shall not discriminate in worker recruitment, compensation, advancement, or retention based on any criteria prohibited by law, including, but not limited to, race, creed, color, religion, national origin, ancestry, alienage or citizenship status, age, disability or handicap, sex, marital status, familial status, veteran status, and sexual orientation or gender identity and/or expression. The Supplier's employment decisions must be based on qualifications, skills, performance, and experience. Suppliers shall ensure that employees are treated and treat each other fairly and with respect and dignity.
- **Underage Labour:** Suppliers shall comply with local minimum age laws and ensure that no underage labour is being used or has been used in the goods or services provided by them or on their behalf.
- **Wage and Benefits:** Suppliers shall ensure that their workers are paid lawful wages and benefits, including overtime, premium pay, and equal pay for equal work, without discrimination and in accordance with all applicable laws.
- **Provide a Safe Workplace:** Suppliers shall ensure that they are in compliance with all employee health and safety laws and regulations in all areas where they have responsibility for workers. Suppliers shall have systems to prevent, detect, and respond to potential risks to the safety, health, and security of all employees and ensure that all workers receive communication and training on emergency planning and safe work practices.

Diversity

Wood Mackenzie is committed to diversity and inclusion within the company and seeks to do business with a diverse mix of Suppliers, including businesses owned by minorities, women, and veterans, among others. Wood Mackenzie encourages its Suppliers to commit likewise, seeking greater diversity through their subcontracting arrangements committed to diversity in race, colour, religion, national origin, ancestry, alienage or citizenship status, age, disability, sex, marital status, familial status, veteran status, and sexual orientation or gender identity and/or expression.

Anti-Bribery and Corruption

Wood Mackenzie is subject to the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act as well as other anti-bribery and corruption laws adopted by the countries where it conducts business. It is Wood Mackenzie's policy that directors, officers, employees, and all Suppliers are prohibited from offering or paying, directly or indirectly, any bribe to any employee, official, or agent of any government, commercial entity, or individual in connection with Wood Mackenzie's business or activities. Likewise, acceptance of any bribe in connection with Wood Mackenzie's business or activities is also prohibited. Wood Mackenzie requires all of its suppliers and their associated persons to establish and maintain adequate procedures designed to prevent bribery.

Accounting Books and Records

Suppliers shall maintain accurate and transparent accounting books, records, and accounts to demonstrate compliance with anti-bribery and corruption laws and other applicable laws and regulations and this Code.

Environmental Responsibility

Wood Mackenzie seeks to do business with Suppliers that exercise good judgment in preserving the natural environment, limiting resource consumption, reducing emissions, and recycling waste.

Wood Mackenzie encourages Suppliers of goods and services to suggest options that lessen the associated environmental impacts, particularly in areas such as air emissions; waste reduction; recovery and management; water use and disposal, including responsible wastewater disposal; proper disposal of hazardous materials; and greenhouse gas emissions.

Privacy and Confidentiality

Suppliers have a duty to protect confidential information. Suppliers are expected to comply with all privacy and security laws and regulations and all other applicable confidentiality laws and regulations governing the protection, use, and disclosure of Wood Mackenzie proprietary, confidential, and personal information. Suppliers may use confidential Wood Mackenzie information to perform work on behalf of Wood Mackenzie. Suppliers must safeguard the confidential information of third parties, including anything that Suppliers learn or create while providing services.

Suppliers must be aware of and follow all local laws and regulations regarding the privacy of individuals, including employees and customers. Suppliers should never disclose personal information to anyone outside of Wood Mackenzie except as required by legal or regulatory process and permitted by the Supplier contract.

Anti Money Laundering and Counter Terrorist Financing

Wood Mackenzie aims to contribute to a global business environment that is free from money laundering and terrorist financing activities. This commitment extends not only to our internal operations but also to our valued network of suppliers, as we collectively strive for a secure and ethical business ecosystem.

Suppliers are expected to comply with all applicable anti-money laundering and counter terrorism financing laws and regulations. They should take all reasonable steps to prevent and detect any illegal form of payment, as well as to prevent their financial transactions from being used by others to launder money or fund terrorist activities, and they should only accept funds from reputable clients and third parties engaged in legitimate business activities with funds derived from legitimate sources. Suppliers should have adequate controls in place to ensure that subcontractors in their supply chain also comply with all applicable anti-money laundering and counter terrorism financing laws and regulations.

In the event of any anti-money laundering or counter terrorism financing investigations or audits, suppliers are expected to cooperate with Wood Mackenzie, and they are obligated to inform Wood Mackenzie of any investigations, legal

actions, or regulatory proceedings related to anti-money laundering or counter terrorism financing matters that may impact their ability to fulfil contractual obligations.

Compliance with Economic Sanctions and Trade Restrictions

Wood Mackenzie is committed to conducting its business in a legal and ethical manner and refuses to engage in prohibited trade practices or to do business with parties who are subject to recognised trade restrictions or economic sanctions. This commitment highlights the necessity of developing a business ecosystem that is aligned with and adheres to all sanctions and trade restrictions, emphasizing compliance throughout our supplier network

Suppliers and their subcontractors must at all times comply with all applicable economic sanctions and trade restrictions imposed by the United Nations, the United Kingdom, the United States, the European Union, and other countries or relevant authorities. This includes broad and targeted sanctions on specific individuals, entities, and countries, as well as any transaction involving goods, technology, software, services, or technical support that may be subject to trade restrictions.

Suppliers must conduct due diligence to ensure that their business activities do not support sanctioned activities. Failure to comply with sanctions laws and regulations may result in the termination of the supplier relationship with Wood Mackenzie.

Suppliers must promptly report any concerns or suspicions regarding potential sanctions violations to Wood Mackenzie and are expected to cooperate fully in any investigations, audits, or inquiries related to sanctions compliance.

Obligations to Communicate These Expectations

By agreeing to do business with Wood Mackenzie, Suppliers acknowledge an obligation to the following:

- Communicate the expectations contained in this Code of Conduct to all employees, contractors, and subcontractors, and third parties assigned to service the Wood Mackenzie account.
- Ensure that all employees are trained as required by all applicable laws and regulations, including, but not limited to, anti-bribery and corruption, modern slavery and human trafficking, privacy and security, and employee health and safety.

Speak Up Platform

Wood Mackenzie provides a confidential hotline, operated, and maintained by a leading company independent of Wood Mackenzie. The Speak Up platform provides Wood Mackenzie's stakeholders, including Suppliers, a way to safely report alleged financial misconduct, bribery and corruption, modern slavery, conflict of interest or other concerns relating to Wood Mackenzie, as well as other potential improprieties, including those that fall under this Supplier Code of Conduct.

All Suppliers are obligated to promptly notify Wood Mackenzie of any failure(s) to comply with this Suppliers Code of Conduct. Suppliers agree that anyone making a confidential report shall not be retaliated against as stated in our [Speak Up Policy](#).

Speak Up reports can be made online or by phone. Online reports can be submitted on <https://speakup.woodmac.com>. Reports by phone can be made using one of the [global hotline phone numbers](#). Both online and phone reporting are available 24/7/365 in various local languages across the globe.

Compliance Monitoring

To measure a Supplier's compliance with this Code, Wood Mackenzie reserves the right to conduct announced and unannounced on-site audits of the Supplier's facilities, operations, books, and records as well as conduct confidential worker interviews in connection with such audits. Wood Mackenzie shall also require the Supplier to complete an annual Supplier Attestation acknowledging compliance with all requirements outlined in this Code.

Acknowledgment

By accepting any contract from Wood Mackenzie, the Supplier acknowledges acceptance of Wood Mackenzie's Supplier Code of Conduct and represents that it is in compliance with the Code's provisions. The Supplier understands that Wood Mackenzie may refuse to continue doing business with the Supplier if the Supplier fails to comply with this Code, subject to the terms and conditions of the contract.