

## Human Rights Policy

### 1. Purpose

The purpose of this Human Rights policy is to clearly explain to our employees, customers, suppliers, shareholders, and the communities we serve, Babcock International Group's support for the principles of employment and human rights legislation.

### 2. Scope

This policy applies across the Group to all countries, functions, sites and employees of Babcock International Group as well as employees of subsidiaries and joint ventures where Babcock has a controlling interest. In joint ventures where Babcock does not have overall control, the leaders and managers of those businesses are strongly encouraged to adopt the same or similar standards.

We also expect our suppliers to respect and adhere to this policy and the requirements of both our Suppliers Code of Conduct and our Sustainable Procurement Policy, Supplier Guide.

### 3. Policy

As an international business we recognise our responsibility to conduct our dealings with the utmost integrity. We are committed to the protection of human rights and we comply with all national laws in the jurisdictions in which we operate in our operations across the world. Where national law and international human rights standards differ, we will where possible follow the higher standard; where they are in conflict, we will adhere to national law, while seeking ways to respect international human rights to the greatest extent possible. We reserve the right to express to governments, when necessary, our position concerning our operations, employees and shareholders and our belief in the importance of respecting human rights.

We welcome the opportunity to contribute positively to global efforts to ensure that human rights are understood and observed. We believe that a culture of respect for, and promotion of, human rights is embedded throughout our business and can be demonstrated by our commitment to ethical conduct in everything we do. We recognise the United Nations Universal Declaration of Human Rights and the standards established by the International Labour Organisation (ILO) and we seek to respect them, subject to applicable national laws and any agreed terms in our employment and other contracts. Our suppliers and their extended supply chain are expected to share this commitment.

Our commitment to human rights is summarised in our Babcock Code of Business Conduct and compliance with this is mandatory for all employees, business advisers and business partners. We expect the same commitment from our suppliers and for them to flow down that commitment through the Supply Chain.

The Babcock Supplier Code of Conduct and Sustainable Procurement Policy, Supplier Guide, which are available on our Group Web pages, describe the Company's expectations of all suppliers doing business with Babcock. In addition to communicating Babcock's values, they mandate full compliance with all laws and regulations. They also address the proper handling of intellectual property and other sensitive data, health, safety and environmental concerns as well as Human Rights including Modern Slavery.

This Group-wide Supplier Code of Conduct provides clarity about our expectations of methods used to deliver environmental and social responsibility. The code reflects the same standards that we hold ourselves to and enables a consistent approach to our customers in delivering to the highest ethical standards. Our suppliers should either be willing to subscribe to our Code or confirm they have equivalent standards and procedures in their own businesses.

### People commitments

**Fair treatment** - We will treat all employees fairly and honestly regardless of where they work. All staff will have a written contract of employment, and agreed terms and conditions, including working time, notice periods on both sides. All staff are entitled to reasonable breaks, welfare facilities and potable water at their place of work. Annual leave is provided in accordance with the legislation of the country where they work. All employees are provided with appropriate equipment and training for their role..

**Modern Slavery** - At Babcock we are committed to conducting our dealings, whether with customers, suppliers, employees or the communities in which we are based, with the utmost integrity and as such we are steadfast in our support for the elimination of modern slavery in all its forms, including the exploitation of children. The Company does not recruit child labour, and supports the elimination of exploitative child labour. Our annual modern slavery statement exploring our current actions in more depth can be found on our website.

**Migrant workers** - We expect all workers, including imported and migrant workers, to be provided wages, benefits and working conditions that are fair and in accordance with local law. We do not condone holding workers' passports to keep them from leaving, charging any type of fee or deposit for employment, or any other unfair practice.

**Freedom of association and collective bargaining** – We respect the rights of employees to choose to be a member of a trade union and to bargain collectively as permitted by local laws and regulations and ensure that these rights are not interfered with or restricted.

**Health and safety** - Babcock ensures the highest Safety, Health & Environmental Protection (SH&EP) standards, in all activities, by meeting and exceeding global regulatory requirements associated with SH&EP and those additionally pertinent to Aviation and Nuclear. We are committed to the delivery of safe and effective products and services first time every time, in order to support our employees', customers' and shareholders' aspirations. Babcock believes nothing is more important than the health, safety and wellbeing of our workforce, contractors, customers and the public.

**Diversity and Inclusion** - We are committed to creating a diverse workforce and an inclusive culture. We believe in the transformative power of engaging different perspectives and working with people from different backgrounds, cultures, and approaches to enhance our working environment and drive our business performance. Understanding and respecting our differences allows us to be ourselves and do our best work. Our aim is for everyone to have a

consistent experience, feel included, be treated fairly and be supported regardless of who they are or where they work.

Our commitment to diversity and inclusion applies to all aspects of employment, such as recruitment, compensation and benefits, training, promotion, transfer and termination. We will treat individuals justly and in a non-discriminatory manner solely according to their abilities to meet the requirements and standards of their role. We also understand the importance of protecting people's data. We shall ensure there is no direct or indirect discrimination against individuals and ensure Employees shall be treated with dignity and in accordance with the Business Code of Conduct, maintaining a work environment free of all forms of harassment or abuse, whether physical, verbal or psychological.

**Policies** - We have a range of policies / approaches in place to support employees in achieving balance between their work commitments and personal priorities including family friendly, agile and flexible working practices.

**All people regardless of colour or creed** - Wherever we operate, we engage with communities and seek to understand the social, cultural, environmental and economic implications of our activities, so that we can respond to concerns and work to optimise benefits and reduce negative impacts, both for the local community and for the overall economy. We respect the diversity of indigenous peoples, acknowledging the unique and important interests that they have in the land, waters and environment as well as their history, culture and traditional ways.

**Ethical sourcing** – We ensure respect for human rights throughout our supply chain and adopt a pro-active approach to identifying and addressing any hidden labour exploitation in wider supply chains. We strive to achieve transparency for higher risk supply chains.


#### 4. Policy Management

This policy is owned and managed centrally by the Group Human Resources (HR) function and sponsored by the Chief Human Resources Officer for Babcock International Group.

In accordance with the United Nations' Guiding Principles on Business and Human Rights, Babcock will disseminate the contents of this Policy, including awareness-raising and training actions and monitoring their effective implementation. To this end, regular monitoring mechanisms will be developed to update areas of potential risk and to optimise the effectiveness of prevention and mitigation actions for negative impacts, with a view to continuously improving the protection of human rights.

Any employee who believes a conflict arises between the language of the policy and the laws, customs and practices of the place where they work, should raise this with their line manager or another senior manager. Alternatively, employees who would like to confidentially report a potential violation of this policy, can use our Global confidential whistleblowing service.

The Global reporting service is confidential and is available 24 hours a day, seven days a week. It can be used if an employee feels unable to raise their concerns with their local management team. No action will be taken against an employee who alerts management to these concerns if they turn out to be unfounded so long as the information and any allegations

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made were passed on in good faith; in the genuine belief that they were substantially true; with no intention of personal gain; and without malice.

Where we have identified adverse human rights impacts resulting from or caused by our business activities, we are committed to provide for or cooperate in their fair and equitable remediation. We seek to promote access to remediation where we are linked to or involved in those adverse impacts through our relationships with third parties.

**5. Further information sources**

Further statements supporting our stance on human rights can be found in the following publicly available policies, guidelines and statements which are available on our website;

- Business Code of Conduct
- Modern Slavery Statement
- Supplier Code of Conduct
- Procurement Sustainability Policy
- Procurement Sustainability Policy – Supplier Guide
- Group SH&EP policy
- Whistleblowing policy

<p><b>ExCo/ Functional Lead</b></p> <p>Nikki Fox</p>	<p><b>Title</b></p> <p>Chief People Officer</p>	<p><b>Signature</b></p>	<p><b>Date</b></p>
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