

CONFLICT OF INTEREST NOTIFICATION PROCEDURE

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This document supports	Conflicts of Interest Policy

Responsibility for this document:

The functional responsibility for the development, review and maintenance of this document rests with the Chief Ethics and Compliance Officer

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1 Purpose and Scope

The purpose of this document is to set out the procedures to be followed by all Wood business units in support of the Wood Conflicts of Interest Policy. This procedure must be followed by all "**Wood Personnel**" meaning all directors and officers, employees, consultants working within Wood and workers working at any Wood business anywhere in the World.

2 Roles and Responsibilities

The functional responsibility for the development, review and maintenance of this procedure rests with the Chief Ethics and Compliance Officer. All Wood business units must ensure that their management systems contain arrangements to support the requirements of this procedure.

3 Conflicts of Interest Reporting Procedure

3.1 Wood Personnel

Where you become aware of an actual or potential conflict of interest (as described in Wood's Conflicts of Interest Policy ("Conflict of Interest")) in accordance with the Wood Conflicts of Interest Policy, you should immediately notify your team leader.

Reports should be made verbally or by email and provide sufficient detail on (i) the nature of the actual or potential Conflict of Interest; and (ii) when you first became aware of actual or potential Conflict of Interest. You should provide copies of any supporting information or documentation that you consider relevant.

Where it is not possible for you to notify your team leader then you should notify the Conflict of Interest to your local People and Organisation ("P&O") representative or to a member of Compliance.

3.2 Team leaders, P&O or Compliance receiving notice of an actual or potential Conflict of Interest

Where an actual or potential Conflict of Interest is notified to you in accordance with section 3.1 above and you consider that there is a potential or actual Conflict of Interest this must be notified and recorded using the Wood Conflict of Interest Disclosure Report Form following the instructions set out in the form. The form can be accessed [here](#).

The Conflict of Interest Disclosure Report Form will automatically be submitted to Compliance who will notify P&O and liaise with all relevant parties in order to determine appropriate actions to be implemented to mitigate the impact of any actual or potential Conflict of Interest.

Compliance may request further information regarding the actual or potential Conflict of Interest by contacting the relevant parties and/ or by contacting the person making the report. Where possible this will be conducted using the Follow Up functionality of the Conflict of Interest Disclosure Report Form. The party making the report will be notified by email if there are any actions for them to complete which should be completed promptly.

The actual or potential Conflict of Interest should be kept confidential and should not otherwise be disclosed unless it is determined by Compliance or P&O that further disclosure is necessary in order to appropriately manage the situation.

3.3 Actions by Compliance following notification of an actual or potential Conflict of Interest

Compliance shall monitor submissions of Conflicts of Interest Disclosure Report Forms ("Report").

On receipt of a Report, Compliance shall review the Report and notify the appropriate P&O contact, and any other parties that Compliance determines are relevant, depending on the nature of the actual or potential Conflict of Interest identified and the location or business unit of the party or parties to the actual or potential Conflict of Interest.

Compliance, P&O and any other relevant parties notified by Compliance shall discuss the potential or actual Conflict of Interest and shall agree (i) the measures to be implemented in order to mitigate the impact of the actual or potential Conflict of Interest; (ii) the manner in which the measures should be communicated to the relevant parties; and (iii) the implementation and review of the agreed measures.

Compliance shall add a summary of the agreed measures, the implementation plan and review periods to the Conflicts of Interest Register maintained centrally by Compliance.

Compliance or P&O, as agreed, shall communicate the agreed measures, the implementation plan and the review periods to the team leader(s) of the party or parties to the actual or potential Conflict of Interest. The team leader(s) shall communicate these to the relevant party or parties to the actual or potential Conflict of Interest.

3.4 Implementation of agreed measures to mitigate the impact of an actual or potential Conflict of Interest

Unless otherwise determined by Compliance and P&O, following communication from Compliance or P&O in accordance with section 3.3, the team leader(s) of the parties to the actual or potential Conflict of Interest shall be responsible for ensuring the agreed measures are implemented and, if required, reviewed at agreed review periods determined in accordance with section 3.3.

4 References

Document title	Document no.
Wood Conflicts of Interest Policy	COP-PLD-100003
Wood Conflict of Interest Disclosure Report Form	N/A

5 Revision History

Rev no.	Rev date	Summary of changes
0	29-Aug-2018	Issued for Use

6 Annex – Flowchart

Conflicts of Interest Notification Procedure Flowchart

[To be read in conjunction with the Conflicts of Interest Policy and Conflicts of Interest Notification Procedure]

Abbreviations

- COI Conflict of Interest
- CTM Compliance Team Member
- P&O People & Organisation
- TL Team Leader

