



Fact sheet



amec
foster
wheeler



Empowering ethics

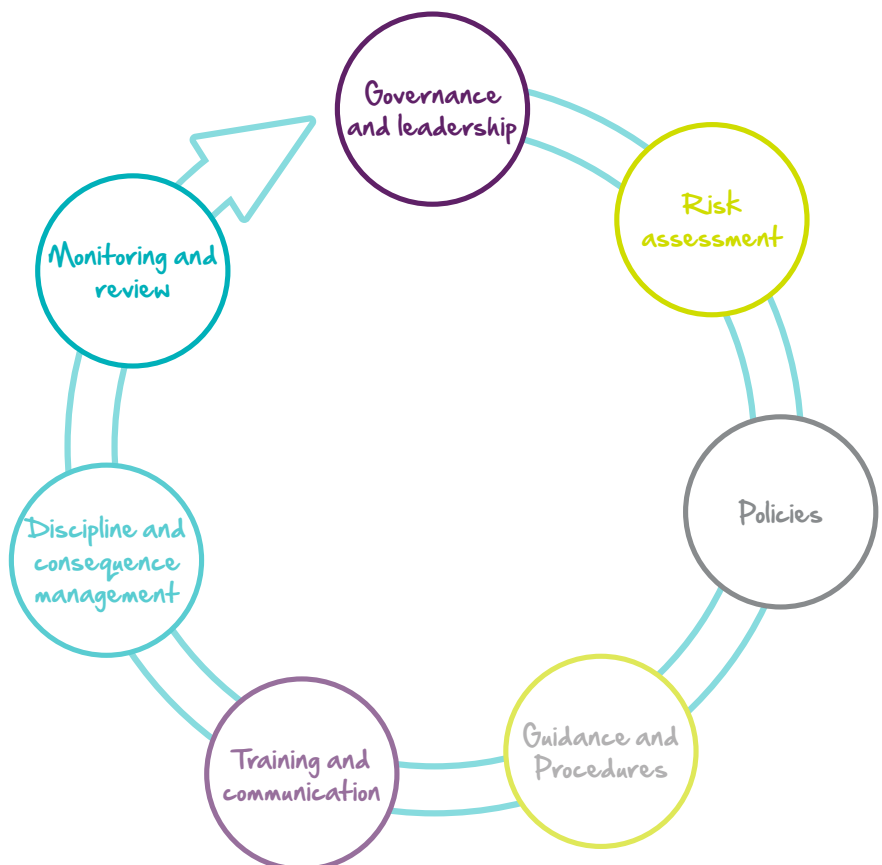
Amec Foster Wheeler has a proud heritage. We have carefully built a reputation for consistently delivering excellence. We have earned the trust of our clients by demonstrating a commitment to always doing the right thing and upholding a culture built on the values expressed in our Code of Business Conduct.

As a global leader, Amec Foster Wheeler demands the highest ethical standards from itself and from all of its relationships. We never accept, or excuse, behaviour which is inconsistent with our values. We ask each individual to live our values and take personal responsibility for their behaviour. Our company supports and encourages our employees and third parties to speak up if they have a concern or they see something they believe is wrong.

Ethics structure

Amec Foster Wheeler has a global ethics and compliance programme that incorporates global best practises and is continually looking to learn and develop.

Our ethics and compliance programme operates on a model that is based upon a foundation of ethical culture and decision making instilled across the company. The model functions as a 'virtuous circle' looking at the horizon to adapt to emerging risks and issues.





Empowering ethics



amec
foster
wheeler

In the same way we demonstrate the right behaviours for safety, we seek to embed ethical decision making in all of our actions and messages at every level of the company. We seek to go beyond 'tone from the top' and ask all of our employees and partners to demonstrate ethical leadership by abiding to the same standards of ethical conduct no matter who they are or where they are in the world.

Ethics issues are discussed with the Health, Safety, Security, Environmental and Ethics (HSSEE) Committee of the Amec Foster Wheeler plc board. The committee oversees and has responsibility for the Code of Business Conduct, its implementation and ethical awareness throughout Amec Foster Wheeler. The committee is supported by our Head of Ethics & Compliance and the Chief General Counsel and Company Secretary. The ethics and compliance Function is responsible for maintaining a high level of awareness through the content of training and communications and calls upon the Legal Function to assist and support with the implementation of training.

Code of Business Conduct and policies, procedures and guidance

Amec Foster Wheeler has a global [Code of Business Conduct](#) (the Code) that has been translated into 14 languages to ensure common understanding everywhere we

do business. The Code sets out Amec Foster Wheeler's values, responsibilities and required behaviours of all who represent or work for the company or under its direction. The Code is viewed as being fundamental to our way of working as it underpins our ethical culture and sets out our expectations of **always doing the right thing**.

The Code is supported by ethics related policies, procedures and guidance. These documents seek to expand upon the broader principles detailed in the Code.

The procedures include:

- An anti-bribery and corruption procedure, which also includes, amongst other things, facilitation payments guidance and provisions to combat bribery and corruption
- An ethics investigations procedure
- A legal matters procedure
- A competition law procedure
- An agents and sponsors procedure
- A third party due diligence procedure
- An offshore payments procedure
- Customer due diligence procedure
- Sanctions procedure

In 2017 we will implement a bi-annual verification exercise for all managers to confirm and certify that both they and their direct reports know and understand our Code, our policies and mandatory procedures. This

serves as an individual pledge to drive compliance and uphold our culture through the accountability of every single member of staff.

Reporting

Amec Foster Wheeler provides various channels to enable its employees and third parties to raise ethics concerns, including a dedicated ethics website and helpline EthicsPoint administered by an independent third party. In 2016, 111 cases were reported to the HSSEE Committee relating to ethical concerns.

Training

We conduct annual mandatory online training on our Code and on Anti-bribery and Corruption (ABAC) to help demonstrate our commitment to ethics. In 2016, 99% of Amec Foster Wheeler employees with access to a computer, completed this training.

We provide face-to-face training to select employees based on risk which covers key ethics and compliance risk areas such as Competition Law, ABAC, Sanctions and Conflicts of Interest. In 2017, we plan to continue our programme of online training to all employees with computer access.

The 2016 online Code of Business Conduct and ABAC training achieved the completion rates set out below:

Number of employees in scope	Number of employees completed COBC	COBC per cent complete	Number of employees completed ABAC	ABAC per cent complete
25,570	25,382	99.3%	25,360	99.2%