

GROUP MODERN SLAVERY POLICY

Effective April 2025

Laing O'Rourke understands that the establishment of our business strategy and delivery of our business objectives can only be achieved by carrying out business openly, honestly and with integrity. We are accordingly committed to ensuring there is no modern slavery in our operations and supply chain.

Breaches of this policy may result in disciplinary action for staff and/or termination of employment or termination of our relationship with organisations with whom we do business.

This policy forms part of our global policy framework, underpinned by 'Doing the Right Thing' – our Global Code of Conduct, and will be realised by:

- Prohibiting modern slavery in all forms, including threats of violence, harassment, discrimination and intimidation within our operations and supply chain
- Ensuring that employees have freedom of movement, freedom of association and freedom to terminate employment, and communicating our expectation of the same from all of our contractors, suppliers and other business partners, including that they ensure the same from their own suppliers
- Prohibiting the use of worker-paid recruitment fees within our operations and supply chain
- Prohibiting compulsory overtime within our operations and supply chain
- Prohibiting child labour
- Prohibiting the confiscation of workers original identification documents and communicating our expectation of the same from all of our contractors, suppliers and other business partners, including that they ensure the same from their own suppliers
- Appropriately supporting victims of modern slavery in identifying access to remedy, compensation and justice
- Ensuring that we understand and comply with the labour/employment laws and laws against slavery applicable to Laing O'Rourke in the jurisdictions in which we operate
- Raising awareness of modern slavery risk for all staff and workforce through training, ensuring
 they are are equipped with the knowledge and understanding necessary to prevent and
 combat modern slavery in all its forms
- Implementing effective due diligence procedures and other controls to ensure modern slavery is not taking place anywhere in our own business or in our supply chains and communicating our expectation of the same high standards from all of our contractors, suppliers and other business partners, that they will hold their own suppliers to the same high standards
- Ensuring that effective arrangements are in place to allow employees to report where they have concerns about modern slavery, and to ensure that such concerns are investigated and reported appropriately to the relevant authorities
- Ensuring that no one who uses our 'speak up' procedures is subject to detriment or victimisation as a result of reporting any suspicion of modern slavery
- Ensuring appropriate oversight of our modern slavery programme
- Reviewing this policy regularly to ensure its effectiveness

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Modern slavery is a violation of fundamental human rights through the severe exploitation of other people for personal or commercial advantage and includes securing services from children and persons vulnerable to modern slavery, slavery, servitude, forced or compulsory labour, human trafficking, debt bondage and deceptive recruiting for labour or services.

Laing O'Rourke expects compliance with this policy across its global operations. This policy applies to all employees and officers of Laing O'Rourke. It also applies to all persons working for us or on our behalf in any capacity, including all employees, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, and includes suppliers to Laing O'Rourke.

Overall responsibility for this policy rests with the Board of Directors of Laing O'Rourke.

The Board of Directors of Laing O'Rourke fully endorses this policy.

Ray O'Rourke KBE Chairman