

MODERN SLAVERY STATEMENT

Financial Year 1 April 2024 to 31 March 2025

Laing O'Rourke's purpose is to push the boundaries of what's possible, in the service of humanity. This purpose is underpinned by our values of care, integrity and courage. In line with our purpose and values, Laing O'Rourke is committed to upholding the human rights of all those who work with us and for us, ensuring they are able to work freely and receive fair pay in return. We are committed to identifying and addressing the risk of modern slavery practices in our operations and supply chain. Laing O'Rourke supports the principles set out in the United Nations Universal Declaration of Human Rights and requires our suppliers and delivery partners to do the same.

1. REPORTING ENTITIES

This Statement is a joint statement made by the following entities:

- Laing O'Rourke Australia Group Pty Limited;
- Laing O'Rourke Australia Pty Ltd;
- Laing O'Rourke Australia Construction Pty Ltd;
- Laing O'Rourke Australia Engineering Pty Limited;
- LORQ Building Pty Limited;
- Laing O'Rourke Australia Specialist Business Pty Ltd;
- Select Plant Australia Pty Ltd; and
- LOR Rail Operations Pty Ltd,

(collectively referred to as '**Laing O'Rourke Australia**').

This Statement sets out the steps taken by these entities and their subsidiaries to prevent modern slavery and human trafficking in their Australian operations and supply chain.

In this Statement, the terms 'Laing O'Rourke Australia', 'we' and 'our' are used to refer collectively to the reporting entities and their subsidiaries.

2. STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Structure

Laing O'Rourke Australia is part of the Laing O'Rourke Group which is a privately owned international engineering and construction company with two principal hubs of operation in Europe (including the Middle East) and Australia. Through its operations around the world, across building and infrastructure sectors, Laing O'Rourke's mission is to secure its position as the recognised leader for innovation and excellence in the construction industry.

Laing O'Rourke Australia operates as a corporate group. Laing O'Rourke Australia Group Pty Ltd is the Australian parent company which is a wholly owned subsidiary of Laing O'Rourke Australia Holdings Limited, a wholly owned subsidiary of the ultimate parent company Laing O'Rourke Corporation Limited, a company domiciled in Jersey.

In addition to the reporting entities identified in section 1, the corporate group includes a range of controlled entities which undertake various functions such as acting as holding companies or supporting the various operations of the business including engineering, construction and program management and asset management of road, rail and other transport infrastructure projects. Laing O'Rourke Australia currently operates or is strategically diversifying into:

- **Rail:** Railway construction in both passenger and heavy freight rail sectors including track maintenance and rehabilitation, station and depot construction, power upgrades, installation of overhead wiring, station access upgrades, level crossing removals and total asset management;
- **Roads:** Bridge construction, roads and motorways, major civil and structural engineering works and complex earthworks;
- **Defence:** Delivery of high quality, value for money infrastructure and facilities for Australia's Department of Defence; and
- **Water:** Project management and construction of new or upgraded water and sewage assets.

Laing O'Rourke Australia also undertakes a range of joint venture activities and alliances which relate to construction projects in Australia.

Operations

Laing O'Rourke Australia has locations in all states and territories except Tasmania with over 20 site offices, corporate offices, storage yards and depots.

Projects

During the reporting period:

- 28 projects were in operation across Australia; and
- 10 projects reached practical completion.

Some of our key projects during the reporting period were:

- **Eastern Freeway Upgrades – Burke to Tram (VIC)** – the scope of works for this project includes:
 - six additional motor lanes to the Eastern Freeway between Burke Road and Tram Road including on-road technology to ease congestion;
 - a major interchange at Bulleen providing a seamless connection with the new North East Link tunnels and linking Melbourne's east with the M80 Ring Road;
 - the first seven kilometres of the Eastern Busway (Melbourne's first dedicated busway) including a connection to the Bulleen Park and Ride;
 - replacement of the existing road bridge at Doncaster Road including reconfiguration of access ramps;
 - improved pedestrian paths and additional landscaping;
 - 11+ kilometres of new and upgraded noise walls designed to meet Victoria's toughest 63 decibel noise standard plus lower 58 decibel protection at night;
 - new and upgraded walking and cycling connections;
 - upgrades to Koonung Creek Reserve and redevelopment of the existing Valda Wetlands within the Koonung Creek corridor; and
 - overhead gantries along the Freeway corridor to support road signage, traffic monitoring systems and similar operational infrastructure;
- **Metronet: Morley to Ellenbrook Rail Line (WA)** – this project involves the delivery of twenty-one kilometres of rail between the existing Bayswater Station and Ellenbrook including five brand new stations: Morley, Noranda, Malaga, Whiteman Park and Ellenbrook and six major structures including two road over rail bridges, two sections of elevated viaduct, a bridge over the Bennett Brooke and a rail tunnel portal under an elevated major road intersection; and
- **Suburban Rail Loop Initial & Early Works (Vic)** – this project involves working across seven locations undertaking utility relocations, demolitions, site establishments and excavating tunnel access shafts in preparation for the main works contractors.

People

Laing O'Rourke Australia had 2,560 employees at the end of the reporting period which were a combination of permanent, fixed term and casual employees. We had 91 migrant workers on a visa which represented 3.5% of our total workforce.

Employee Type	Number	% of Total Workforce
Permanent	2,289	89.5%
Fixed term	14	0.5%
Casual	257	10%
Total	2,560	100%

Supply Chain

Laing O'Rourke Australia typically sources products and services from suppliers which are broadly active in the construction, engineering, maintenance and corporate sectors. The term 'supplier' is used to refer to any entity in our supply chain including consultants, subcontractors or other product or service providers.

During the reporting period we spent more than \$3.4 billion purchasing products and services from 3,432 direct suppliers. Approximately 99% of our spend was with suppliers based in Australia with the remaining 1% of our spend being with suppliers based overseas in UK, New Zealand, USA, Canada and Singapore.

Concrete and quarry materials are sourced from quarries located within Australia, steel (including reinforcing steel and structural steel sections) is generally manufactured in Australia with the raw materials being sourced from Australia, Europe and Asia. Plant and Equipment is sourced locally from Australian based dealerships who in turn source this equipment from Europe and Asia where it is manufactured.

This reporting period our top 5 supplier spend categories were:

1. Formwork, Reinforcement and Concrete Pouring (FRP) subcontractors;
2. Labour hire;
3. Precast suppliers;
4. Piling subcontractors; and
5. Equipment hire.

We require our suppliers to comply with all applicable regulations and legislation relating to working hours, wages, welfare and human rights. We also believe in supporting our suppliers through training and knowledge-sharing and hold regular forums to communicate clear expectations.

3. MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

Laing O'Rourke continues to take a risk-based approach to identifying high-risk areas of modern slavery. We used the following risk criteria when assessing our modern slavery risks and identifying high-risk areas in our operations and supply chain:

- vulnerable populations;
- high risk geographies;
- high risk industries and categories; and
- high risk business models.

Operations

This reporting period we have assessed the risk of modern slavery in our operations as being low. As further described in section 4, we have numerous people controls in place including our process for onboarding new employees, wage and salary reviews for our employees and the verification of corresponding payments.

Our onboarding process includes comprehensive employment checks which ensures that all our employees have valid visas and working rights. Our employee induction process includes a training module on our Global Code of Conduct along with our various policies.

We provide an external independent multi-lingual whistleblower service known as Safecall which is available to all employees and members of our supply chain to raise any concerns on an anonymous basis.

Supply Chain

Long supply chains in construction mean that goods and services secured appropriately within Australia may in fact present a high risk of modern slavery and we have identified a range of potential modern slavery risk areas that may be present in our operations and supply chain. These potential risk areas include:

- construction sites which can include many separate companies all working concurrently and all with their own supply chain partners that may include low-skilled workers who are especially vulnerable to modern slavery practices;
- commodities and materials used in construction projects such as steel, manufactured components, cement, aggregates, bricks, plant and equipment, cables and PPE may be manufactured using modern slavery practices as workers in these industries are often migrant populations, low paid and low skilled;
- procurement of high-risk subcontractors such as labour hire, cleaning, logistics and security that, if not monitored closely, reward low price through competitive tendering and the risk is increased where these workers are low skilled or from migrant backgrounds;
- technology where the raw materials required within items such as computers, phones and engineering instruments are manufactured in Asia and Southeast Asia which are seen as being particularly high risk of forced labour with large numbers of workers being migrant workers; and
- service providers of design, drafting and other services may exploit workers, including where these providers are in higher risk geographies.

4. ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Our modern slavery risk mitigation approach is underpinned by our Global Code of Conduct, strong supplier due diligence, procurement management and a robust corporate governance framework.

Doing the right thing: Our Global Code of Conduct

Our mission to become the recognised leader for innovation and excellence in the construction industry requires us all to play an active role in supporting a culture that is founded on integrity and supported by ethical actions.

Through the power of our collective experience we have built a reputation as a business that acts ethically and with integrity and in the best interests of the communities in which we operate.

Our Global Code of Conduct ('**Code of Conduct**') clearly sets out the standards that we uphold as a business and our expectations for our people and supply chain partners. We require anyone acting or working on our behalf including consultants, partners, affiliates, subcontractors and suppliers, to follow and uphold the intent of the standards set out in the Code of Conduct. The Code outlines our commitment to upholding the human rights of all those who work with us.

To ensure our people understand and are aligned with the expectations set out in the Code of Conduct, it is mandatory for all employees to complete an eLearning course and Code of Conduct pledge as part of their onboarding process and on an annual basis. This course ensures that our people are fully aware of the ethical standards expected by Laing O'Rourke.

Workers on our project sites are provided with a 'tool-box talk' covering the key elements of the Code of Conduct to ensure we drive responsible and ethical behaviour into our delivery activities at the site level.

We provide our staff with the knowledge and confidence to call out others who may not be meeting the ethical standards set out in the Code of Conduct. Any breaches or non-adherence to the Code of Conduct may be raised or reported on our dedicated confidential whistleblowing hotline which is independently run with trained multi-lingual operators and is available 24/7. There is also the option to file a report online at <https://www.safecall.co.uk/report/>.

Our Code of Conduct can be read in full on our [website](#).

Supplier due diligence and procurement management

In order for a supplier to work on one of our projects they must first become accredited via our internal due diligence process. This involves completing a due diligence questionnaire to determine whether they have adequate policies, processes and procedures in place. Where our suppliers do not have a policy of their own we ensure that they agree to abide by our Code of Conduct.

We also have a number of approved enterprise agreements in place that provide labour rates for our direct hire workforce and require our subcontractors to sign a monthly statutory declaration stating that they are paying their employees in accordance with the relevant industrial instrument that applies to their workers. Laing O'Rourke Australia also aligns with labour hire licence requirements where required, in particular in Victoria and Queensland.

We also undertake supply chain scoring where the performance of our suppliers is monitored and assessed in a number of areas on a quarterly basis to identify any opportunities for improvement or to acknowledge successes at review meetings.

For our most important and influential suppliers, our 'Key Supplier Programme' ensures that business to business relationships are maintained at a high level. These relationships provide us with a significant ability to drive alignment and improvement in managing modern slavery risks in our supply chain.

Our 'invitation to tender' process includes key questions for a proposed supplier to answer which would assist in raising concerns in respect of modern slavery. Additionally, our standard contracts used with our supply chain include clauses relating to modern slavery.

During the reporting period our procurement practices have been largely unaffected by the Russia/Ukraine war, interest rates or tariffs. Inflation in recent years has taken its toll in terms of the levels of supplier insolvency we have seen in the market and we have made changes to our financial due diligence checks process as a result; specifically the level of interrogation we have on insolvency mitigation plans for specific suppliers.

Corporate governance framework

We operate within an established and externally benchmarked corporate governance framework that is underpinned by our mission and guiding principles set out in our Code of Conduct. A key function of our corporate governance framework is the identification, management and mitigation of operational and financial risks.

Modern slavery continues to be a standing agenda item for the Laing O'Rourke Australia Compliance Committee to ensure that modern slavery is discussed and considered by senior management.

Policies and procedures

Our Modern Slavery Policy confirms our commitment to the prohibition of all forms of modern slavery in our operations and supply chain. This policy forms part of our global policy framework supported by our Code of Conduct.

Laing O'Rourke expects compliance with the Modern Slavery Policy across its global operations. The policy applies to all employees and officers of Laing O'Rourke and to all persons working for us or on our behalf in any capacity, including suppliers. Breaches of this policy may result in disciplinary action up to and including termination of employment and termination of our

relationship with other individuals and organisations working on our behalf or our suppliers and supply chain.

Additionally, we have specific modern slavery controls within our Risk Control Review which takes a number of the recommendations from Stronger Together. Multi-functional responsibility for these controls are in place and the Compliance Committee meets on a quarterly basis to review and consider these controls and whether any action or changes are required.

During the reporting period a dashboard has been developed to track key performance indicators in respect of modern slavery. This dashboard is reviewed and considered by the Compliance Committee during its quarterly meetings.

Awareness and training

Our Health and Safety (**H&S**) project leads actively look for signs of modern slavery across all of our project sites and continue to be the contacts on our project sites for any concerns in respect of modern slavery. Our H&S executive team and Mental Health Champions also assist with awareness and how to deal with any concerns which are raised.

Our Code of Conduct posters are displayed at all site locations and these posters include the details of our Safecall multi-lingual whistleblower hotline. Additionally, our annual Code of Conduct training and pledge certification was completed by all employees.

Modern slavery posters in multiple high-risk languages are also on display at all our project sites to raise awareness of modern slavery with various contact numbers for assistance including our Safecall whistleblower hotline.

A mandatory modern slavery awareness training program in the form of an e-learning module was again rolled out during the reporting period to all employees across the business to raise awareness, educate workers on how to spot the signs of modern slavery on our sites and to advise who to contact to report an incident or raise any concerns. Part of our awareness program is the Modern Slavery Incident Response Plan which is a resource accessible to all workers.

Our supplier pre-qualification tool includes specific directed questions in respect of modern slavery. All suppliers wanting to supply to our new projects will need to provide this information.

Our modern slavery awareness video has been published on our external facing Health Safety Environment Management System website which can be viewed by all our employees, workers and suppliers. This awareness video also forms part of all site inductions.

5. EFFECTIVENESS OF THE ACTIONS

Laing O'Rourke Australia has established the following mechanisms for reviewing the effectiveness of its actions to identify, assess and address risks of modern slavery:

- conduct of internal compliance audits every six months, reported to the Australian Executive Committee;
- the Compliance Committee reviewing relevant policies and ensuring that modern slavery controls operate appropriately within the compliance workstream;
- implementation of risk reporting processes that highlight any project-based risks to senior management;
- audit of our supplier due diligence process and assessments;
- number of reported modern slavery concerns including to our Safecall whistleblower hotline;
- monitoring the Safecall whistleblower hotline to ensure reports on complaints or suspicions are dealt with appropriately and our investigation process is followed;
- number of suppliers we have not onboarded or that have been terminated due to a failure to meet our modern slavery requirements;
- carrying out an annual supply chain analysis and review; and
- communicating with and training our workforce to further develop awareness and understanding of modern slavery risks.

6. CONSULTATION PROCESS

This Statement has been prepared by the Compliance Committee who drives our response to modern slavery risk and oversees the actions taken to address those risks in our operations and supply chain. The Compliance Committee comprises senior representatives from Risk and Assurance, Procurement, Finance, People and Legal.

Laing O'Rourke Australia operates as a corporate group and the board of directors along with the Australian Executive Committee are responsible for the reporting entities and their subsidiaries to ensure that all policies, procedures and actions are aligned across the group.

This Statement for the financial year 2025 is published pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) and was developed in consultation with each reporting entity. This Statement has been approved by the board of directors in its capacity as principal governing body of Laing O'Rourke Australia Group Pty Ltd on 23 September 2025.

A handwritten signature in blue ink, appearing to read 'Mark Dimmock', with a stylized flourish at the end.

Mark Dimmock
Managing Director
Laing O'Rourke Australia