



## **LAING O'ROURKE AUSTRALIA MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR 1 APRIL 2021 TO 31 MARCH 2022**

Laing O'Rourke is committed to identifying and addressing the risk of modern slavery practices in our operations and supply chain. We are 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. Laing O'Rourke supports the principles set out in the United Nations Universal Declaration of Human Rights and requires its suppliers and delivery partners to do the same.

### **1. REPORTING ENTITIES**

This Statement is a joint statement made by Laing O'Rourke Australia Group Pty Ltd, Laing O'Rourke Australia Pty Ltd and Laing O'Rourke Australia Construction Pty Ltd (collectively referred to as 'Laing O'Rourke Australia'). The 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.

This Statement does not apply to Laing O'Rourke Australia's non-controlled joint ventures.

### **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 2025 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, which is a wholly owned subsidiary of the ultimate parent company Laing O'Rourke Corporation, a company domiciled in Jersey.

In addition to the reporting entities identified in section 1, Laing O'Rourke Australia 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 design, engineering, construction and program management of rail, road, building and infrastructure 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 and the ACT with over 20 site offices, corporate offices, storage yards and depots.

## Projects

During the reporting period:

- 47 projects were in execution across Australia; and
- 6 projects were completed.

Some of our key projects during the reporting period were:

- **Central Station Metro (NSW)** – this project will deliver the new Sydney Metro platforms under Central Station and associated infrastructure including the landmark Central Walk to integrate into the existing Central Station;
- **Gudai-Darri (WA)** – the scope of works for this project included the supply and installation of the structural, mechanical and piping for the run of mine and primary crusher, coarse or stockpile, screenhouse, secondary crusher, train load out, sample lab and associated conveyors; and
- **South Eastern Program Alliance (Manchester & Maroondah) (Vic)** – this project relates to the construction of 2 railway bridges at Maroondah Highway and Manchester Road.

## People

Laing O'Rourke Australia had 2,726 employees at the end of the reporting period which were a combination of permanent, fixed term and casual employees. We had 99 migrant workers on a visa which represented 3.6% of our total workforce.

Employee Type	Number	% of Total Workforce
Permanent	2,431	89%
Fixed term	59	2%
Casual	236	9%
<b>Total</b>	<b>2,726</b>	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 service providers.

During the reporting period we spent more than \$2.3 billion purchasing products and services from 3,091 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 Thailand, Hong Kong, the UK and the USA.

Our top 5 supplier spend categories include:

1. **Subcontractors** such as labour hire, civil, structural, building, piling, steel fabrication, electrical and mechanical services, logistics, commissioning and testing, excavation and earthworks, surveyors and signalling.
2. **IT and Corporate Services** such as software and data products, communication devices, computers and hardware, insurance, legal, professional services and leases.
3. **Consultants** such as architects, designers, structural engineers, rail signalling and other designers;
4. **Suppliers** such as concrete, steel, reinforcing steel, precast, rail, cable, rigging equipment, engineering products, quarry products and general building materials;
5. **Equipment Hire** such as trucks, utes, excavators, cranes, small tools and other plant 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:

- (i) vulnerable populations;
- (ii) high risk geographies;
- (iii) high risk industries and categories; and
- (iv) 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 also includes a training module on our Code of Conduct along with our various policies.

We provide an external independent multi-lingual whistle-blower service known as Safecall which is available to all employees and members of our supply chain to raise 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 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.

#### **COVID 19**

Many of the modern slavery risks may be exacerbated in the context of a pandemic, for example, low-paid and low-skilled workers in cleaning and security roles, migrant labour on construction sites and workers engaged as casuals or in other insecure work models can become increasingly vulnerable in the context of shutdowns or declining availability of work. The demand for increasing amounts of cleaning and increased hygiene to be provided on an

urgent basis also brings with it risks of exploitation of workers in the supply chain. Additionally, lockdowns and travel restrictions have delayed deliveries of materials to site and our construction program.

Our operations were defined as 'essential services' by various State Government's with most of our projects continuing to operate throughout the reporting period, albeit at a reduced capacity as and when necessary to adhere to State Government and health authority guidelines. Our COVID-19 Response Committee implemented a COVID-19 Response Plan to mitigate the impact of the pandemic on our operations and ensure business continuity.

Covid-19 Safety Management Plans continued as necessary for construction sites which included the implementation of social distancing policies, split shifts and many staff work from home where possible. These protocols also applied to all supplier and contract personnel attending our owned or operated sites. In our offices, staff numbers were carefully managed and with staff working from home when necessary, socially distanced while in the office and utilising various technologies to ensure ongoing business operations.

While our projects were impacted by the pandemic, disruption to our supply chain partners was minimal. However due to the Government's infrastructure stimulus package, we did experience an escalation of activity during the reporting period with tenders.

#### **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 2025 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**") 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. 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, all employees are required to complete an eLearning course and Code of Conduct pledge as part of their onboarding process and each year. 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 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. Any breaches or non-adherence to the Code 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 Global 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. As part of this process, we review our suppliers' policies ensuring they are aligned with our own policies. 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.

## **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 Global Code of Conduct. A key function of our corporate governance framework is the identification, management and mitigation of operational and financial risks.

Modern slavery is an agenda item for the Compliance Committees for Laing O'Rourke Australia and Laing O'Rourke Group to ensure that modern slavery is considered by senior management.

## **Policies and procedures**

The Global Modern Slavery Working Group prepared a dedicated Modern Slavery Policy which was rolled out across Laing O'Rourke Group. This policy forms part of our global policy framework supported by our Global Code of Conduct.

Laing O'Rourke expects compliance with this 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, the Global Modern Slavery Working Group has developed 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 Working Group meets on a quarterly basis to review and consider these controls and whether any action or changes are required.

## **Awareness and training**

Laing O'Rourke provided modern slavery awareness and response plan training to all Health, Safety and Environment ('HSE') project leads who are the contacts on site for any concerns in respect of modern slavery. Our HSE executive team and Mental Health Champions were also trained to assist with awareness and how to deal with any concerns which are raised.

Our Code of Conduct posters were distributed and 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.

We have approved the design and production of modern slavery posters to be distributed to all projects in multiple high-risk languages and an e-learning module has been prepared to be rolled out to all employees to raise awareness and how to spot the signs of modern slavery on our sites.

## **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 to our Safecall whistle-blower hotline;
- monitoring the Safecall whistle-blower 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**

The Modern Slavery Working Group drives our response to modern slavery risk and oversees the actions taken to address those risks in our operations and supply chain. The Working Group comprises senior representatives from Risk and Assurance, Procurement, People and Legal across the Laing O'Rourke Group in Europe and Australia.

Laing O'Rourke Australia operates as a corporate group and 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 has been prepared by the Modern Slavery Working Group in consultation with a range of stakeholders and has been made available for review and comment by the Australian Executive Committee prior to approval.

## **7. LOOKING AHEAD**

We continue to take a multi-year approach to strengthening our response to modern slavery risks in our operations and supply chain. In the next reporting period we anticipate our actions will include:

- the display of multi-lingual on-site posters to raise awareness of modern slavery among the workforce;
- modern slavery awareness and response plan training to all site-based and office employees to educate them on the risks, how to recognise the signs of modern slavery and how to respond;
- mandatory Code of Conduct training and pledge certification to all employees which occurs on an annual basis;
- supplier on-boarding process to be updated to include key questions in respect of modern slavery concerns; and
- modern slavery clauses to be inserted into our standard supply chain agreements.

This Statement for the financial year 2022 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 Australian Executive Committee of Laing O'Rourke Australia Group Pty Ltd on 27 September 2022.



**Rebecca Hanley**  
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Laing O'Rourke Australia