



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR FINANCIAL YEAR 1 APRIL 2024 to 31 MARCH 2025

Laing O'Rourke is firmly committed to upholding the human rights of all those who work with us and for us, ensuring that they can work freely and receive fair pay in return. This commitment is aligned to our purpose, which is to push the boundaries of what's possible in service of humanity through our values of care, integrity and courage.

We fully support the principles set out in the United Nations Universal Declaration of Human Rights and expect the same from our suppliers and partners across our supply chains. We are committed to identifying, preventing and addressing the risk of modern slavery practices in our operations and supply chains.

1. REPORTING ENTITIES

This Statement is published under section 54(1) of the Modern Slavery Act 2015 by Laing O'Rourke plc and its relevant subsidiaries [1] for the financial year 1 April 2024 to 31 March 2025 ('**Reporting Entities**'). The Statement sets out the steps taken to prevent modern slavery and human trafficking in Laing O'Rourke's UK operations and supply chain.

In this Statement, the terms 'Laing O'Rourke', 'we' and 'our' are used to refer collectively to the Reporting Entities and our UK business operations.

This statement does not apply to Laing O'Rourke's non-controlled joint arrangements.

2. OPERATIONS

We are an international engineering and construction company delivering state-of-the-art infrastructure and buildings projects for clients in the UK, Middle East and Australia.

We deliver certainty for our clients based on an operating model that harnesses new technologies to maximise the use of pioneering modern methods of construction.

We have our own in-house supply chain comprising specialist businesses, that also work independently for other companies. When we mobilise our fully integrated delivery team we work together to de-risk projects with clients, integrate design and manufacturing with logistics, and accelerate construction on site. This reduces the risks associated with a traditional, fragmented approach to construction delivery and provides greater certainty to our clients.

Our highly trained and committed people understand the challenges of modern construction, the stakeholders involved, and how to work collaboratively to deliver our clients' aims.

With international operations spanning the UK, Middle East and Australia, our company remains vigilant to the risk of modern slavery and human trafficking and recognises that in certain markets the number of workers that are trafficked, exploited, and forced to work in the construction industry is rising.

More information about us can be found [here](#). During the reporting period:

- 132 projects were in execution across the UK worth £18.2bn; and
- 3 projects were completed.

3. SUPPLY CHAIN

Laing O'Rourke typically sources products and services from suppliers that 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, suppliers, subcontractors, or other service providers. During the reporting period we spent circa £850m purchasing products and services from more than 1,500 direct suppliers.

Approximately 95% of our directly engaged supply chain members are based in the UK, with the remaining 5% based overseas in mainland Europe.

Many of the businesses that contract with Laing O'Rourke source elements of their offerings via extended overseas supply chains. The diversity and complexity of our projects means that the scope and nature of the extended supply chains vary widely.

Our top five supplier spend categories include:

1. Consultants such as architects, structural engineers, MEP engineers, technology and innovation specialists and other designers;
2. Subcontractors such as civils, structural, envelope, electrical and mechanical services and labour hire;
3. Suppliers such as ready-mix concrete, reinforcement, precast, waste removal, cable and general materials / accessories;
4. Equipment hire such as small tools, excavators, cranes, mobile elevated work platforms, HGVs and LGVs; and
5. IT and corporate services such as software and data products, hardware and professional services.

4. RISKS OF MODERN SLAVERY IN PRACTICES WITHIN OUR OPERATIONS AND SUPPLY CHAIN

During the reporting period we have continued the process of identifying the areas carrying the highest risk of modern slavery and human trafficking within our direct operations and supply chains. To make the assessment we considered the following four intersecting risk criteria:

- (i) vulnerable populations;
- (ii) high risk categories;

- (iii) high risk business models; and
- (iv) high risk geographies.

Long supply chains in construction mean that goods and services secured appropriately within the UK could still potentially present a high risk of modern slavery, and we have identified a range of potential risk areas that may be present in our operations and supply chains. These potential risk areas include:

- construction sites, which can involve many separate companies all working concurrently and all with their own supply chains. Each 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. These 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. If not monitored closely, competitive tendering that rewards low price may increase the risk, especially where these workers are low skilled or from migrant backgrounds;
- technology where the raw materials required within items such as computers, phones, photovoltaic solar panels and engineering instruments are manufactured in Asia and Southeast Asia, which are seen as being particularly high risk for forced labour with large numbers of workers being migrant workers; and
- service providers of design, drafting and other services. The risk in this area is that the service could exploit workers, including where these providers are located in higher risk geographies.

5. ACTIONS TAKEN TO ASSESS AND ADDRESS THE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESS

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.

We have produced a dedicated Supply Chain Code of Conduct, which includes the specific elements of the Global Code of Conduct applicable to the supply chain. All supply chain companies are required to confirm their acceptance of and compliance with the Supply Chain Code of Conduct during onboarding.

Doing the right thing: Our Global Code of Conduct / Supply Chain 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 experience, we have built a reputation as a business that acts ethically, with integrity, and in the best interests of the communities in which we operate.

Our Global Code of Conduct / Supply Chain 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.

To ensure everyone understands and aligns with the expectations outlined in our Code, all employees are required to complete an eLearning course and sign a commitment pledge during onboarding and annually thereafter. This reinforces awareness of the ethical standards we uphold.

On our project sites, workers receive a 'toolbox talk' that highlights the key principles of the Code to ensure we drive responsible and ethical behaviour into our delivery activities at the site level. We empower our people with the knowledge and confidence to speak up when they observe behaviour that falls short of our standards.

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 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

In order for a supplier to work on one of our projects they must first become accredited via our internal screening process, which includes prequalification aligned to the Common Assessment Standard (CAS) through the Constructionline platform. This involves the supplier completing a due diligence questionnaire to determine whether they have adequate policies, processes, and procedures in place. As part of this process, suppliers are required to confirm their acceptance of and compliance with various Laing O'Rourke policies including the Supply Chain Code of Conduct, Modern Slavery Policy and the Modern Slavery toolbox talk.

We carry out due diligence on every supplier, using Dun & Bradstreet's 'indueD' cloud-based solution supplemented with media searches and internal investigation work, to ensure that they meet our business integrity standards. This includes screening right up to ultimate beneficial owners where checks are made for bribery, corruption, sanctions, money laundering, fraud, competition, and modern slavery.

All suppliers that are engaged to carry out work for Laing O'Rourke are monitored daily by induceD, with alerts issued where any changes occur that may impact the level of risk.

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, strategic engagement at a high level ensures that business to business relationships are appropriately maintained. These relationships provide us with a significant ability to drive alignment and improvement in managing modern slavery risks in our supply chain.

Procurement management

We continually review and update our temporary labour hire engagement practices, and our standard Temporary Labour Hire Agreement includes provisions requiring an undertaking to comply with modern slavery requirements and our Modern Slavery Policy.

We have reviewed our supply chain process and data capture for high-risk materials and commodities, and as part of our Modern Slavery Working Group, we have established workstreams to conduct Modern Slavery Risk Assessments across all categories of our Tier 1 supply chain.

This begins with identifying the highest risk categories and sub-categories of goods/products/materials in our supply chain, with focus on materials and components used in products and their countries of origin.

Two ethical site audits involving face to face interviews with an appropriate proportion of the workforce and a series of targeted vendor audits focused on high-risk categories have also been carried out by an independent global supply chain risk management expert, with further audits planned.

Corporate governance framework

We operate within a well-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 a core compliance area that is discussed and considered by senior management and is integrated as a key policy area within our risk control review.

Policies and procedures

Our Modern Slavery Working Group continues to play a key role in strengthening our approach to identifying and addressing modern slavery risks across our operations and supply chain. The group is specifically focused on enhancing the controls we have in place to prevent or mitigate these risks.

Meeting monthly, the working group brings together senior representatives from our compliance, corporate affairs, legal, people, procurement, security, sustainability and workforce functions across the UK and Middle East.

We have implemented a dedicated Modern Slavery Policy across the Laing O'Rourke Group, which is reviewed annually alongside our broader suite of business integrity policies and formally endorsed by our Board of Directors. Once updated, these policies are communicated to all staff to ensure continued awareness and alignment with our ethical and compliance standards.

Our subcontract and purchase order conditions require our suppliers to comply with our Modern Slavery Policy and comprehensive sub-subcontracting provisions require that these obligations are stepped down to the extended supply chain.

Awareness and training

As part of our ongoing commitment to eradicating modern slavery across from our operations and supply chains, all staff are required to complete an annual mandatory e-learning module on modern slavery awareness. This training ensures that everyone is equipped to recognise and appropriately respond to potential modern slavery risks. Completion rates for the e-learning module are closely monitored, and performance data is escalated to our Executive Committee. This oversight helps drive accountability and encourages increased engagement across the organisation.

For workers on project sites, a tailored toolbox talk is delivered, highlighting the key aspects of modern slavery. Both the e-learning and toolbox talk are launched during Anti-Slavery Week each year, forming part of a broader campaign to raise awareness and drive engagement on this critical issue. Both are also utilised for all new starters and for the subsequent year.

To further support this initiative, we distribute modern slavery awareness posters to all project sites during the week. These posters include contact information for our whistleblowing hotline, reinforcing our commitment to transparency and accountability.

In partnership with UK anti-slavery charity Unseen, we also joined forces with ten companies within the construction industry to raise awareness of modern slavery on construction sites. Together, we produced a short film portraying the realities faced by victims and highlighted key warning signs that site teams should be vigilant about. This joint initiative reflects a shared commitment among industry leaders to take collective responsibility for educating the wider supply chain and driving out modern slavery from UK construction sites. The film is intended for use across the built environment sector, serving as a powerful training and induction tool to raise awareness and increase the likelihood of exploitative practices being identified and reported. The film was also recognised for its impact, earning a Silver Award at the Smiley Charity Film Awards.

6. EFFECTIVENESS OF THE ACTIONS AND KEY PERFORMANCE INDICATORS

Our business has established the following mechanisms for considering the effectiveness of its actions to identify, assess and address risks of modern slavery:

- Annual review of modern slavery policy and response plans, with updates communicated to all staff and workforce;
- Bi-annual internal review of modern slavery controls to ensure they are operating appropriately, with results reported to the Group Compliance Committee, Group Executive Committee and Audit & Risk Committee;
- Implementation of risk reporting processes that highlight any project-based risks to senior management;
- Undertaking compliance and due diligence checks on each member of the supply chain when they are appointed to a specific project. Performance scoring is also carried out quarterly for each award; and
- Constant monitoring of whistleblowing hotline to ensure reports on complaints or suspicions of modern slavery are dealt with appropriately and our investigation process is duly followed.

We also recognise that identifying and addressing modern slavery risks across our operations and supply chain is an ongoing and evolving process. We therefore use the following Key Performance Indicators to better understand the effectiveness of our actions to identify and address modern slavery risks:

- Tracking completion of annual modern slavery awareness training (staff) and toolbox talks (workforce) to further develop awareness and understanding of modern slavery risks;
- Engaging an external provider to conduct onsite project ethical audits and management system audits during which a significant proportion of direct Laing O'Rourke and supply chain operatives are interviewed with the objective of identifying any risks of forced labour;
- Ensuring all supply chain partners provide modern slavery policies within the first year of trading with Laing O'Rourke; and
- Tracking completion of Modern Slavery learning pathways via the Supply Chain Sustainability School for priority suppliers.

7. LOOKING AHEAD

We will continue to take a multi-year approach to strengthening our response to modern slavery risks in our operations and supply chains. Improvements in the next reporting period will include:

- continued awareness and response plan training to site-based employees and high-risk modern slavery suppliers;
- refreshed mandatory Modern Slavery eLearning for all staff and toolbox talk for all workforce; and
- continued engagement of an external provider to conduct further audits on high-risk suppliers to check they are consistently applying good practice in identifying, deterring, and tackling hidden labour exploitation.

8. RESPONSIBILITY AND COMPLIANCE

Laing O'Rourke's European Executive Committee has overall responsibility for this statement and for ensuring that all policies and procedures under this statement are aligned and complied with.

This statement has been approved by the Board of Laing O'Rourke plc.



Ray O'Rourke KBE

Chairman

15th August 2025

[1] Relevant subsidiaries in scope of the Act's disclosure requirement are as follows: Explore 2050 Manufacturing Limited; Select Plant Hire Company Limited; Explore 2050 Engineering Limited; Laing O'Rourke Delivery Limited and Laing O'Rourke Services.