

LAING O'ROURKE

Doing the right thing

OUR GLOBAL CODE OF CONDUCT

EDITION 7 • 2024



THE POWER
OF EXPERIENCE

LAINGOROURKE.COM

Remember, if in doubt...

We have policies, procedures and guidance to help us, but they cannot cover every situation. “Doing the Right Thing” - Our Global Code of Conduct, is about helping you to make the right decisions. If you’re ever unsure about whether a course of action is right or wrong, just ask yourself the following questions:



- Does it comply with applicable laws and regulations?
- Does it comply with our policies? These are summarised in sections 1-4 of this Code.
- Could it cause problems for Laing O’Rourke, our customers, suppliers or other business partners?
- How would you feel if it became public? Could your intentions be misinterpreted by third parties?
- How would you feel if you had to explain it to your friends and family?

Foreword

Laing O'Rourke's global standing for acting safely and responsibly is critical to running a successful and growing business that generates value for all our stakeholders. Our 2025 Mission to become the recognised leader for innovation and excellence in the construction industry requires us to maintain and build our reputation. In turn, this means that how we do things is just as important as what we do - we are about doing business the right way, not doing business at any price.

“Doing the Right Thing” – Our Global Code of Conduct, (the “Code”), sets out Laing O'Rourke's commitment to operating globally in accordance with our ethical standards and in compliance with applicable laws.

We will be judged on our actions and nothing - whether hitting targets, completing a job on time or even a direct instruction from a manager – is more important than doing the right thing. This Code applies to everybody within Laing O'Rourke, at all levels, and we also expect our suppliers to follow and uphold the intent of the Code by complying with our related policies.

By complying with the standards set out in the Code and speaking up when we see conduct that falls short of them, we will sustain long term business success by encouraging more ethical and effective relationships and stimulating deeper contributions in the communities where we operate.

Please take the time to read and understand the Code, and use it as a reference in your work.

Cathal O'Rourke
Group Chief
Executive Officer

Sir John Parker
Chair

We all want to Do the Right Thing

Most of the time, it's easy. But sometimes taking the right course of action isn't so straightforward.

“Doing the Right Thing” – Our Global Code of Conduct is here to help. It sets clear standards for our behaviour as a business and helps us all do the right thing, no matter what situation we're in.

This Global Code of Conduct is important. By following it, we are all helping to maintain the world-class reputation on which our success as a business depends.

Signing the pledge to do the right thing is a personal commitment we expect everyone working at Laing O'Rourke to take.

Contents

Introduction

Foreword	
We all want to Do the Right Thing	1
What Doing the Right Thing is for	3
Who Doing the Right Thing is for	7
Speaking up	9
If in doubt	11

Section 1. Business integrity 13

Bribery and corruption	15
Fraud, deception and dishonesty	16
Money laundering	17
Conflicts of interest	19
Gifts and hospitality	20
Working with agents and joint ventures	21
Competition and anti-trust laws	22
Sanctions, trade and export controls	23
Relationships with suppliers	25
Relationships with governments	26
Relationships with customers	27
Relationships with other stakeholders	28

Section 2. Working with each other 29

Health and safety	31
Drugs and alcohol	32
Diversity and inclusion	34
Harassment and bullying	35
Human rights and modern slavery	36

Section 3. Our responsibilities as a global company 37

Environmental sustainability	39
Respecting communities	40
Charities and not-for-profit organisations	41
Tax compliance and transparency	42

Section 4. Keeping assets and data safe 43

Protecting personal information	45
Safeguarding confidential information	46
Use of IT and communication systems	47
Financial controls and record keeping	48
Protecting company assets	49
External communications	50

Section 5. References 51

Glossary of terms	53
Index of issues	54
Further information	55

What Doing the Right Thing is for

How the Code guides the way we do business.

Doing the Right Thing - Our Global Code of Conduct (the “Code”) - is integral to the way we do business at Laing O’Rourke and underpins our Mission and Guiding Principles. It sets out clearly our expectations that everyone in the company should act ethically and responsibly in accordance with the following ethical standards:

- act with integrity (see section 1)
- treat everyone with respect and make safety personal (see section 2)
- be committed to operating a sustainable business (see section 3)
- respect and safeguard confidential and personal information (see section 4).

We aim to enhance our global reputation as an organisation that upholds the highest standards of ethical business conduct. We comply with applicable laws and regulations but we understand that acting ethically often requires us to operate to a higher standard than the legal minimum. This Code articulates the ethical standards that we expect every Laing O’Rourke employee to uphold in every activity, every day, wherever we operate.

The Laing O’Rourke Group’s activities are driven by our 2025 Mission and Guiding Principles. These are supported by the Code and our Group policies and procedures. Together they form a compelling and relevant guide to what we want to achieve and, importantly, how we will achieve them.

Our **Mission** is to become the recognised leader for innovation and excellence in the construction industry.

Our **Guiding Principles** underpin everything we do:

Absolute alignment: We work as one team by knowing and understanding our people and their talents to deliver for our customers.

Complete thinking: We look at projects in their entirety to ensure we bring together all the parts at the right time and in the right way for the customer and the business.

Sophisticated simplicity: We aim to make our complex world feel simple, useable and inspiring.

The Code guides every employee in upholding our commitment to act fairly and responsibly with all stakeholders. All Laing O’Rourke employees must comply with the Code in both spirit and letter. This Code is not intended to be a substitute for the legal obligations that are imposed by government laws and regulations in every part of the globe in which we operate. In instances where local laws and regulations impose different obligations or duties to those contained in this Code, those laws and regulations are required to be met as a minimum.

The Code applies to all of our operations globally.

Our **Group policies** underpin the Code. Our policies establish and define the internal rules that everyone must comply with to conduct business effectively. As the Group operates globally, we are subject to various regulations and enforcement activities in the jurisdictions where we operate. This environment demands that every employee and leader be aware, knowledgeable and committed to excellence in the application of clear, global and mandatory Laing O’Rourke policies.

iGMS is a portal to Laing O’Rourke’s enterprise wide management system. It is the repository for all policies, procedures, guidance and technical information that enables our people to be organised for success, providing them with guidance on how we want them to work. All the policies and procedures within iGMS are mandatory in the jurisdictions to which they apply. As an organisation focused on delivering major projects and strategic frameworks, iGMS helps our people deliver certainty to our clients, driving consistency and adherence to processes and procedures.

Hub/Business Unit/Function-specific procedures and guidance ensure that the different operating Hubs (and their constituent parts) can adapt their business practices and processes to suit the markets and the applicable legal and regulatory environments in which they operate. They are designed to align with, and complement Group policies. In addition they remain true to both the spirit and the letter of the Code, and comply with applicable laws and regulations.

Procedures and guidance cannot take precedence over Group policies.

How it's managed

The Code is managed by the members of our Group Executive Committee. Significant breaches of the Code are reported to them unless local laws prevent it.

How to use it

We expect you to keep the Code at the forefront of your mind in your day-to-day work. Start by familiarising yourself with the ethical standards, particularly those most relevant to your area of responsibility.

If you have any concerns, or if you think that someone or something might be in breach of the Code, never keep it to yourself – speak up about it. To find out how to raise a concern or report a breach, see “Speaking up” on page 9.

Ethics and compliance

Compliance is about complying with the laws and regulations that apply to our operations and implementing controls which minimise the risk of a failure to comply with those laws or standards. These controls take the form of our Group policies and our procedures and guidance on iGMS.

Ethics is about responsible business conduct and Doing the Right Thing. Ethical decision making may go beyond our minimum legal compliance obligations – just because we have a right to do something doesn't mean it is the right thing to do.

Some types of **compliance breaches** will be unethical (e.g. bribery) but this is not always the case. For example, data protection laws or competition laws are very detailed and it is quite possible to have a serious compliance breach of these laws without thinking you have acted unethically. Equally, some types of **ethics breach** will also break the law and be a compliance breach (e.g. fraud), but some ethics breaches will not be. For example, it might be legal for our supply chain to use child labour in some countries, but following our Code would mean this is unacceptable to us.

It is accordingly vital that we are clear on our ethical standards both as a company and individually and on the compliance obligations that we must meet in our roles. The Code is designed to address these requirements. Where there is a difference between the standards required by local law and the standards set out in this Code, the higher standard will always apply.



Doing the wrong thing

We are all capable of doing the wrong thing, especially if we are under real or perceived pressure. In cases of an **ethics breach**, people may do the wrong thing because they don't know that what they are doing is wrong. Usually this happens because of some sort of pressure, for example:

Performance pressure - where we feel under pressure (real or imagined) to hit targets on time or cost and feel that "failure is not an option".

Time pressure – where we are pressured to make a decision on something that feels wrong immediately but not given the time to think about the decision.

Management pressure – where you may be given a direct management instruction to do something you are uncomfortable with. This can put you in an extremely difficult position.

Pressure to belong – where something feels wrong, but it seems that everyone else is doing it. You might be told "this is the way things are done around here".

Resisting this sort of pressure can be really hard. Having difficult performance conversations, challenging "groupthink", pushing back against a management instruction or being the one who "rocks the boat" are not things that most of us are comfortable with. This is why good people sometimes drift into doing the wrong thing. However, being able to recognise pressure and how it influences people can help us to resist it. At Laing O'Rourke we do not do business at any cost. If you feel under pressure, and you are not comfortable addressing the issue with your line manager, please use our "Speaking up" procedure on page 9 to get advice or report your concerns.

In cases of a **compliance breach**, good people sometimes do the wrong thing because of pressure, but often they do the wrong thing because they just do not understand the compliance obligation, for example:

You know what you are supposed to do, but it seems a waste of time – sometimes we know what the process is that we are supposed to follow, but it seems pointless or time consuming for no benefit, so we don't do it.

You aren't sure what you are supposed to do so you just do the easiest thing – sometimes we don't know what we should do, but we also aren't sure who to ask, so we just do the easiest thing and no-one seems to mind.

You do something which you thought was ok, but it breached a compliance obligation – sometimes, through no fault of our own, or perhaps because we haven't done the relevant training, we do something which turns out to be a breach of a compliance obligation.

Serious compliance breaches can result from conduct which seems perfectly ethical. This is why it is really important that we understand the compliance obligations that apply to us. Many of these are summarised in pages 13 to 50 of this Code, although there may be others that apply to your specific role which are not listed here. Laing O'Rourke has compliance policies, procedures, guidance and training in place for a reason. It is important that we observe these controls, because if we don't there can be very serious consequences for the company and for individual employees.

Doing the wrong thing

We are all capable of doing the wrong thing – especially if we are under real or perceived pressure. In cases of an ethics breach, people may do the wrong thing because they don't know that what they are doing is wrong. Usually this happens because of some sort of pressure.

Accountability

Where a **compliance breach** or **ethics breach** occurs, we will hold employees, agents, directors and suppliers accountable. We will not, however, blame our workforce for compliance breaches where they have acted in good faith. This means that:

- we will not take action for a compliance breach which occurs entirely as a result of factors beyond an employee's control.
- we will train our employees in their compliance obligations so that they know and understand which compliance obligations apply and the controls which should be in effect.
- we won't "second guess" difficult decisions with the benefit of hindsight. We know our workforce has to make tough decisions and, if a compliance breach occurs as a result of a good faith judgment call that someone has been empowered to make, we will accept that.

But

- We will take action for any deliberate or reckless breach of a compliance obligation.
- We will take action if a compliance breach occurs but is not reported.
- We will take action where there is a consistent pattern of compliance breaches and we are failing to learn from our mistakes.
- We will take action where the breach was a result of an action which the person did not have the authority to take.
- We will take action where the act cannot reasonably have been one that was believed to be in line with Laing O'Rourke's policies or relevant applicable law.



Who Doing the Right Thing is for

Responsibilities for employees

Understand the Code and keep it front of mind

- read this document carefully and keep it close at hand
- ask for help if anything isn't clear
- keep the Code's ethical standards in mind in your day-to-day work
- sign the personal commitment pledge
- complete Code training, when required
- record any gifts and hospitality in the appropriate register
- disclose any conflicts of interest in the appropriate register

Raise your concerns

- raise any concerns you might have, and report any suspected breaches of the Code (see "Speaking up" on page 9 for how to do this)

Special responsibilities for managers and supervisors

Promote the Code

- promote the Code by setting a personal example
- make sure the Code is understood by employees, giving guidance when necessary
- ensure everyone in your team signs the personal commitment pledge
- raise awareness and understanding of the Code through training
- raise awareness of the Code among third parties (such as contractors and suppliers)

Responsibilities for Laing O'Rourke

Laing O'Rourke is committed to:

- making available the training you need to understand the compliance obligations that apply to your role
- investigating all cases that are reported through our "Speaking up" process thoroughly and without fear or favour
- creating a culture where everyone understands the behaviour required of them and feels comfortable using our "Speaking up" process. We will not tolerate retaliation or victimisation of workers who raise concerns
- protecting employees against malicious and untrue allegations. In such cases we may take disciplinary action against the person making the allegation

All employees, directors and temporary staff

Everyone directly employed by Laing O'Rourke must follow the Code. Given that we operate globally, it is important that we all understand that some laws have application beyond a single country and that minimum legal standards differ from country to country. Our ethical standards are, however, a constant wherever we operate in the world.

The Code is designed to ensure that Laing O'Rourke's workforce around the world understands the ethical standards and behaviour which we should expect from one another and which other people expect from us.

Supply chain partners

We require anyone acting or working on our behalf, such as agents, partners, affiliates, subcontractors and suppliers, to follow and uphold the intent of this Code.



Promote the Code

- Promote the Code by setting a personal example.
- Make sure the Code is understood by employees, giving guidance when necessary.
- Ensure everyone in your team signs the personal commitment pledge.
- Raise awareness and understanding of the Code through training.
- Raise awareness of the Code among third parties (such as contractors and suppliers).

Speaking up

If you have a concern, if you think that a breach of the Code might be taking place, or if you need advice on handling a difficult situation, it's important to speak up about it. Speaking up early could protect you and the company from serious legal consequences, avoid damage to the company's reputation and even save someone's life.

Raising a concern

If you think there may have been a breach of the Code, you must report it.

There are a number of different ways you can raise a concern or get advice and assistance. Choose whichever route you feel comfortable with, or suits the situation best.

How we support you

Anything you report will be treated in strict confidence and communicated on a need-to-know basis only. You can raise concerns anonymously if you prefer to, although this may make it more difficult for us to investigate. We value the courage it takes to speak up about unethical behaviour and will never penalise you for raising a concern, even if your suspicions prove to be unfounded. Raising a concern will not adversely affect your career. We will protect employees against malicious and untrue allegations made against them. In such cases we may take disciplinary action against the person making the allegation.

Line manager or supervisor

If you don't feel comfortable talking directly about an issue to the person involved, you can raise it with a project or functional leader.

Compliance Officer

We have appointed a number of trained Compliance Officers who can deal with any concerns you might have about breaches of the Code, if you would prefer not to raise the issue with management. Your email or call will be dealt with in the strictest confidence.

See Whistleblowing on iGMS for contact details.

People Function or Legal Function

You can also raise concerns with your local People Function or Legal Function.

Safecall

Our dedicated phone line for reporting breaches of the Code is independently run, with trained operators available 24/7, and it is also completely confidential. The operator will record your concern and refer it to a Compliance Officer for investigation in accordance with our procedures.

You can also register any concerns online at www.safecall.co.uk/report or by emailing lor@safecall.co.uk. As with the phone line, your report will be treated in complete confidence and referred to a Compliance Officer for investigation.

Raising a concern using Safecall

Our dedicated phone line for reporting breaches of the Code is independently run, with trained operators available 24/7. It is confidential.

Australia	1800 312 928
Canada	1877 59 98073
Hong Kong	3077 5524
UAE	80004413376
UK	0800 915 1571

Online at:
www.safecall.co.uk/report

Or email:
lor@safecall.co.uk

What happens when you report a breach?

When you make a report, this will be passed to the Compliance Officers or other appropriate person for investigation.

How will concerns be investigated?

The Compliance Officer will:

- A. assess the information and decide a suitable course of investigation
- B. brief a Group Executive Committee Director
- C. identify any specialist support required
- D. manage communications, as necessary
- E. collect, check the integrity of, and preserve all relevant information

Depending on the circumstances, the results of an investigation may include disciplinary action up to and including dismissal and/or reporting of criminal conduct to the police or other appropriate authority. Ultimately, findings will be reported to the Group Executive Committee subject to limitations that may apply in some countries.

We will not tolerate any retaliation or discrimination of any kind against anyone who does the right thing. If you or anyone else you know is experiencing retaliation or discrimination, don't put up with it – report it at once. We regard any such behaviour as a serious matter, and we will act against it and protect you.

Registering gifts, hospitality and conflicts of interest

We ensure all gifts and hospitality are within acceptable limits and will never offer or accept anything that could be perceived as a bribe or an attempt to inappropriately influence a business decision. All gifts, hospitality and conflicts of interest must be recorded in the appropriate register.

For more about our approach for addressing bribery, corruption and conflicts of interest, see Section 1, on page 13.

If in doubt

The Code gives you a clear set of guidelines to help you do the right thing. But they can only take you so far.

If you're ever unsure about whether a course of action is right or wrong, just ask yourself the following questions:



Ask yourself:

- Does it comply with applicable laws and regulations?
- Does it comply with our policies? These are summarised in sections 1-4 of this Code.
- Could it cause problems for Laing O'Rourke, our customers, suppliers or other business partners?
- How would you feel if it became public? Could your intentions be misinterpreted by third parties?
- How would you feel if you had to explain it to your friends and family?

If you are unsure about what to do, ask for advice.

Section 1

Business integrity

Integrity is central to Laing O'Rourke wherever we do business.

- We are fair and transparent in everything we do
- We value and respect those who work for and with us
- We never ignore or condone wrongdoing
- We are proud of our good reputation and strive to protect it

In this section

- Bribery and corruption 15
- Fraud, deception and dishonesty 16
- Money laundering 17
- Conflicts of interest 19
- Gifts and hospitality 20
- Working with agents and joint ventures 21
- Competition and anti-trust laws 22
- Sanctions, trade and export controls 23
- Relationships with suppliers 25
- Relationships with governments 26
- Relationships with customers 27
- Relationships with other stakeholders 28

Am I doing
the right thing?

Money
laundering

Bribery and
corruption

Conflicts of
interest

Fraud, deception
and dishonesty

Gifts and
hospitality

Working with
agents and
joint ventures

Competition
and anti-
trust laws

Sanctions, trade
and export
controls

Relationships
with suppliers

Relationships with
governments

Relationships
with
customers

Relationships with
other stakeholders

Bribery and corruption

We do not offer or accept bribes or facilitation payments or engage in any form of corruption, whether directly, through our supply chain or any third party.

What it means:

Bribery means the provision or receipt of anything of value (financial or otherwise) in order to improperly influence or reward any action or inaction of any person in the performance of their duties.

A **facilitation payment** is usually a small payment (or gift) made to public officials in order to speed up or “facilitate” actions they should already do as part of their routine job. It doesn't include fees required to be paid by law for the service.

Corruption means the abuse of a position of power or responsibility for profit.

We always:

- use company funds for lawful, ethical and proper purposes only
- make it clear to all third parties that offering or paying any kind of bribe on our behalf is completely unacceptable
- record gifts and hospitality accurately, completely and transparently
- report any corruption or attempts at bribery

We never:

- make or accept any improper payments to obtain, retain or improve business
- offer, promise or give any advantage or anything of value to a public official (or their representative) to influence them in the performance of their duties
- make facilitation payments (except where you are in fear for your personal safety or liberty)
- give or accept gifts or hospitality with the expectation that a business advantage will be provided in return

Examples:

A public official suggests you need to make a special private payment to get something done.

Facilitation payments contravene the Code. Report any request for a facilitation payment immediately.

Being offered a high value gift or lavish hospitality that makes you feel obliged to do something in return.

Always ask if you're not sure whether to accept a gift. Make a record of any gift or hospitality you receive in the register.

Receiving a request from a union official that the company makes a donation to a union, makes a payment to support a particular union cause or engages a particular employee or sub-contractor in exchange for maintaining good relations with the union or to reduce the risk of industrial unrest on a particular project.

Depending upon the situation, this could amount to bribery, a facilitation payment or corruption. You should immediately report any such request to your manager, your local People Function or Legal Function, a Compliance Officer or through Safecall.

See Whistleblowing on iGMS for contact details.

Fraud, deception and dishonesty

We will never knowingly engage in, condone or ignore any kind of fraud, false claim, deception or dishonest behaviour or allow someone else to do so on our behalf.

What it means:

Fraud means obtaining an advantage (financial or otherwise) or causing someone a loss through the use of deliberate deception.

Making a **false claim** is fraud; using or diverting the company's money or resources for improper purposes is also fraud.

We always:

- act honestly and transparently
- ensure our financial records are complete, not misleading and comply with our contractual obligations
- ensure our invoices are accurate and transparent
- accurately record time spent, expenses, materials and services provided

We never:

- falsify expenses or claim for expenses not incurred on legitimate company business
- make a false claim by knowingly misrepresenting or inaccurately recording time spent or materials or services provided
- allow anyone else to act fraudulently on our behalf
- ignore anything that we suspect could involve or give the appearance of fraud or deception
- make payments in cash or cash equivalents, or in currencies other than those specified on the invoice

Examples:

Inflating costs on a client invoice to compensate for their difficult behaviour.

We always charge our clients in a fair and transparent manner according to agreed contract terms.

Using old test or inspection results to cover up for tests not completed.

Falsifying work or test results is dangerous and often illegal. We never cut corners or charge clients for work not undertaken.

Using plant or machinery for your own private business without prior approval.

Using plant or machinery for private purposes can be dangerous and disruptive and is not permitted.

Withholding payment to a third party without proper justification.

We always pay third parties agreed sums at agreed times unless there is good cause.

Money laundering

We ensure that Laing O'Rourke's businesses are not used to launder money, facilitate terrorist financing or other activities designed to hide criminal property.

What it means:

Money laundering means dealing with property (whether cash or anything else of value) which a person knows or suspects may be criminal property (i.e. property which has been obtained through criminal conduct) anywhere in the world.

Money laundering may occur when a third party passes criminal property to Laing O'Rourke. This might be a payment from a client, materials from a supplier or other goods. Criminal property is property which is the product of criminal activity of some sort – it could be a client who has made their money in a corrupt manner, or a supplier who engages in criminal activity (e.g. modern slavery, illegal trafficking etc.) to produce goods for sale. In these circumstances we may have an obligation to report our suspicions to the relevant authorities. Failure to do so may be a criminal offence on the part of the individual who fails to make the report.

It is therefore important that we know about the full identity and character of our clients, suppliers and other third parties that we deal with.

We always:

- do all that we reasonably can to ensure that we only deal with people and organisations of sound integrity
- know our clients and suppliers by undertaking due diligence in accordance with iGMS procedures
- are alert to changes in details or circumstances which may increase money laundering risks
- raise any concerns with a Compliance Officer, or Legal Function leader in your relevant Hub.

See Whistleblowing on iGMS for contact details.

We never:

- allow deals that are too good to be true to proceed without undertaking appropriate investigation
- accept cash payments

Examples:

A supplier has offered to sell us a large quantity of rebar at a knock down price. This supplier doesn't usually sell rebar and the price seems too good to be true.

This may be a legitimate transaction, but Laing O'Rourke needs to understand where the rebar has come from and why it is so cheap. Talk to the supplier and seek an explanation. If you still have a concern, raise it with a Compliance Officer, or Legal Function leader in your relevant Hub.

A supplier based in East Asia is accused in the media of using child labour to make products that we are purchasing.

The allegations may not be true, but we will need to look into them thoroughly. The use of child labour is a serious criminal offence and that may also mean that the products being supplied become "criminal property". Buying criminal property is money laundering, so you would need to report this to a Compliance Officer, or Legal Function leader in your relevant Hub.

A very wealthy foreign individual approaches you with a view to Laing O'Rourke constructing a luxury hotel without going through a tender process. There are strong suggestions in the media that the individual has acquired his wealth through associates and business relationships connected to illegal arms and drug dealing abroad and wishes to make payments for the hotel via a series of offshore accounts in foreign jurisdictions.

The information in the media may be inaccurate speculation, but if true we could become implicated in money laundering and face prosecution from authorities in the UK and potentially also abroad. We would need to carry out due diligence on the individuals and companies involved as well as understanding clearly the status of any bank accounts and amounts that would likely be paid. We could need to report the transaction to the authorities if we suspected links to criminal activity. This approach would therefore need reporting to a Compliance Officer, or Legal Function leader in your relevant Hub.

See Whistleblowing on iGMS for contact details.

Money laundering

Money laundering may occur when a third party passes criminal property to Laing O'Rourke. This might be a payment from a client, materials from a supplier or other goods. Criminal property is property which is the product of criminal activity of some sort – it could be a client who has made their money in a corrupt manner, or a supplier who engages in criminal activity (e.g. modern slavery or illegal trafficking) to produce goods for sale. In these circumstances we may have an obligation to report our suspicions to the relevant authorities. Failure to do so may be a criminal offence on the part of the individual who fails to make the report.

Conflicts of interest

We avoid or declare situations in which our personal interests could lead to a conflict of interest. We declare and manage any potential conflicts as soon as we become aware of them.

What it means:

A **conflict of interest** occurs when two different interests are in competition with each other. These might include personal, business or financial interests. If they are not declared or managed, they may compromise, or seem to compromise, our judgment, loyalty or independence.

We respect individual privacy and believe that outside interests benefit our staff, however, if your personal or political business activities conflict or appear to conflict with your loyalty and obligations to the company, this “conflict of interest” must be declared.

Even if you don't think the conflict will actually influence you, you should declare it, as the appearance of a conflict of interest can be just as damaging as an actual conflict of interest. If you are in doubt, get advice – see “Speaking Up” on page 9.

We always:

- report any conflicts of interest or perceived conflicts of interest in the register as soon as we become aware of them
- abstain from any decision-making process where our motives, loyalty or independence could be questioned
- inform Laing O'Rourke if a close relative holds a position of influence within a supplier, customer or competitor
- seek approval before accepting any outside employment, advisory position or directorship

We never:

- use our position within Laing O'Rourke for personal gain, or to benefit family or friends
- invest in supplier, customer or competing companies if the investment might influence decisions we make on behalf of Laing O'Rourke

Examples:

Developing a particularly close relationship with a supplier or contractor to the potential exclusion of others.

Amicable working relationships with suppliers and clients are desirable provided the transparency of negotiations and transactions is not compromised or perceived to be compromised.

Being involved in hiring, managing or appraising a relative or friend.

Declaring and reporting relationships where there may be a conflict of interest is important to ensure an open and honest working environment.

Making a decision to benefit yourself, or a relative or friend, rather than the company.

As an employee you are expected to put the interests of the company first where they conflict with your personal interests.

Dealing with a company in which you hold shares or other interest.

As soon as you become aware of a potential conflict, discuss it with your manager and declare it using the register. Resolve the conflict before proceeding with any arrangement.

Gifts and hospitality

We make sure any gifts and hospitality offered or received external to Laing O'Rourke are made on an exceptional basis only and have a clear business benefit. We will never offer or accept anything that could be perceived as an attempt to create a sense of obligation or otherwise inappropriately influence a business decision.

What it means:

The exchange of **gifts and hospitality** is customary in some cultures and can build goodwill in business relationships, but can be used improperly. It is not just the value that's important, the intent and timing too must be considered. Excessive or inappropriate gifts or hospitality can tarnish our reputation for fair dealing and may even break the law.

All gifts and hospitality must be recorded in the register, even if not accepted.

We always:

- record gifts and hospitality offered and received in the register even if not accepted
- exercise care when offering any gift or hospitality to a public official and check the specific rules for the country in advance
- make sure any gifts or hospitality we offer or receive are legal, customary and reasonable in terms of value and frequency

We never:

- offer or accept gifts or hospitality if we think they might impair objective judgement, improperly influence a decision or create a sense of obligation, or if there's a risk they could be misconstrued or misinterpreted by others
- make direct or indirect contributions to political parties, causes or candidates
- offer or accept any gift or hospitality which is offered for something in return ("quid pro quo")
- offer or accept any gifts of cash or cash equivalents (e.g. investment securities or cheques)

- offer or accept any hospitality of an inappropriate nature or which does not comply with our commitment to respecting the individual or which might damage our reputation
- ask for gifts or hospitality from third parties

Examples:

Accepting something that you know you would not be able to offer, because it contravened our Code.

Accepting inappropriate gifts can be just as damaging as giving them. Always register gifts, hospitality and conflicts of interest in the appropriate register to ensure transparency.

Feeling under an obligation to accept a gift or hospitality from a supplier, contractor or other third party.

If in doubt do not accept any offers if you believe it would create a sense of obligation or impair your objective judgment.

Accepting a gift or hospitality even though you have struggled to justify it to yourself.

Make sure any gifts or hospitality which you offer or receive are legal, customary and reasonable in terms of value and frequency. Inform your line manager if you have received or given a gift of more than nominal value.

Working with agents and joint ventures

We will conduct due diligence on all prospective agents, intermediaries and joint venture partners and only work with third parties whose policies and standards are in accordance with our own.

What it means:

The breadth of our expertise and geographical reach means we are engaged on a wide range of projects around the world, and from time to time we may hire an agent or intermediary to help or represent us. Their local knowledge and experience can be essential, but it is our responsibility to make sure their conduct meets our standards. If they act illegally on our behalf, we may be liable to prosecution.

We always:

- obtain senior management approval when retaining the services of an agent or other intermediary and follow the approved process to hire them
- conduct due diligence to check an agent's integrity, experience, background and reputation
- make sure we understand what services a third party will actually deliver in return for the money we pay them
- ensure that all the money can be properly accounted for and payments are transparent and recorded
- report any offers of inappropriate gifts, hospitality or attempts to win an unfair business advantage by any third parties on our behalf

We never:

- permit any third parties to offer or pay bribes or make facilitation payments on our behalf, or do anything else we would not be permitted to do ourselves
- enter into an agreement that does not have a clear and proper commercial rationale
- pay any money to an agent unless a binding written agreement is in place, we know exactly what the payment is for and that we are receiving goods and/or services that properly and fairly reflect that payment

Examples:

Taking on a new agent by personal recommendation.

Personal recommendations are acceptable practices, provided that due diligence and process is undertaken on the proposed supplier before appointment.

Being offered, or seeing evidence of, unusually large fees or cash payments (made to a third party).

Any suspicions of inappropriate payments must be reported to your manager, your local People Function or Legal Function, a Compliance Officer or through Safecall.

See Whistleblowing on iGMS for contact details.

Receiving a request for money to be paid into a personal or offshore bank account.

Any suspicions of inappropriate payments must be reported to your manager, your local People Function or Legal Function, a Compliance Officer or through Safecall.

See Whistleblowing on iGMS for contact details.

Realising that your intermediary has links with a public official or their family.

If you are aware of any such conflict of interest you should record this in the register to ensure open and transparent dealings.

Competition and anti-trust laws

We welcome fair, open and honest competition and refuse to engage in practices aimed at achieving an unfair competitive advantage.

What it means:

Competition laws (also known as “anti-trust” laws) protect free enterprise and prohibit behaviour that distorts the market for goods and services. These laws combat illegal practices like price-fixing, market-sharing, cover pricing or bid-rigging conspiracies. They also address abuse of a position of dominance in a particular market. These laws differ by country and can be very complex. Breaching these laws is a serious offence and can result in huge fines and criminal prosecutions.

We always:

- ensure that any agreement with joint venture partners does not raise competition concerns
- consider competition law when dealing with our competitors, as any agreement with them could have the effect of distorting the market. Keep sensitive commercial information such as prices confidential
- report any suspicions or allegations of possible anti-competitive behaviour
- leave a business meeting if a competitor is present and sensitive competition issues such as pricing arise
- seek legal advice if in any doubt

We never:

- engage in or condone bid rigging
- make agreements (tacit or otherwise) with competitors to fix prices, bids or contracts
- agree with competitors to share or not to compete in particular markets or for particular customers

- use our size or position to unfairly keep out competitors or exploit customers or third parties
- attempt to drive a competitor out of the market by pricing below cost

Examples:

Having an innocent but inappropriate chat with a competitor at a trade fair that could be viewed as a willingness to engage in compromising activity.

Be aware of how such engagements can be perceived and never divulge confidential information to competitors, suppliers or third parties.

Being offered sensitive or confidential information about a tender.

You should never accept such offers and they should always be reported to your manager, your local People Function or Legal Function, a Compliance Officer or through Safecall.

See Whistleblowing on iGMS for contact details.

Being asked to participate in price rigging with a competitor.

We never engage in any price fixing with competitors or suppliers. If you suspect this is taking place you must report it to your manager, your local People Function or Legal Function, a Compliance Officer or through Safecall.

See Whistleblowing on iGMS for contact details.

Sanctions, trade and export controls

We trade lawfully and properly at all times complying with all import/export licensing requirements, embargoes and prohibitions on dealing with sanctioned persons.

What it means:

There are various bodies that implement sanctions regimes, notably the Security Council of the United Nations, the European Union and various national government bodies (e.g. OFSI in the UK, DFAT in Australia and OFAC in the USA). These may take the form of **comprehensive sanctions** (embargoes) against a country or territory, or **targeted sanctions** prohibiting specific business activity (as opposed to all business activity) in a country or territory. In addition, sanctioning bodies maintain lists of **designated individuals** with whom we are prohibited from doing business.

Export controls are intended to control the sale, shipment, transfer or disclosure of information, software, goods and services. They may form part of the enforcement of comprehensive or targeted sanctions regimes.

These laws are complex, and the states and persons subject to sanctions are constantly changing. Breaking a country's laws may mean we cannot work there again and have severe consequences for our reputation.

We always:

- comply with all relevant local and international laws relating to the movement of goods and services
- obtain all necessary licences to import and export goods
- undertake due diligence on suppliers and clients so that we know who we are dealing with and can check against sanctions watchlists
- provide accurate and truthful information to customs authorities
- make sure all duties, levies and taxes are paid
- ensure our goods reach their intended destination

We never:

- import prohibited goods
- import restricted goods into a country without declaring them
- engage in restrictive trade practices or comply with illegal or unofficial restrictive trade practices.

Examples:

Having doubts about which laws apply to a particular country.

If you ever have any doubts about specific laws, contact your local Legal Function prior to going ahead with any imports or exports.

See Whistleblowing on iGMS for contact details.

Importing restricted goods into a country without declaring them.

You must declare all restricted goods and obtain the necessary licences for the specific country you are importing from or to. Make sure all duties, levies and taxes are paid.

Being economical with the truth on a customs declaration for restricted goods.

We must always provide accurate and truthful information to customs authorities.

Doing the right thing

OUR GLOBAL
CODE OF
CONDUCT

Sanctions, trade and export controls

We trade lawfully and properly at all times complying with all import/export licensing requirements, embargoes and prohibitions on dealing with sanctioned persons.

You must declare all restricted goods and obtain the necessary licences for the specific country you are importing from/to. Make sure all duties, levies and taxes are paid.

Relationships with suppliers

We are committed to developing mutually beneficial relationships with suppliers who adhere to our Global Code of Conduct.

What it means:

Suppliers play a key role in enabling Laing O'Rourke to deliver its services. We believe in working openly, fairly and ethically to build lasting relationships and deliver the highest value for our clients.

We always:

- select suppliers and partners based on fair, transparent and objective processes
- work with suppliers who share our business and ethical standards in accordance with the Global Code of Conduct
- ensure total compliance with the applicable laws and regulations of the country in which we are operating, including working hours, wages, welfare, human rights and any International Labour Organisation Core Conventions that have been adopted by the country in which we operate
- encourage suppliers to provide robust training programmes and support for employees' career development
- ensure work is completed safely to the agreed timelines, quality and cost targets and with the highest standards of professionalism
- work openly and collaboratively with our supply chain, resolving disputes in a non-adversarial manner

We never:

- tolerate any form of bribery or corruption
- turn a blind eye to any practices of human rights infringements on supplier employees

Examples:

Witnessing a sub-contractor taking dangerous shortcuts on a project in order to save time or money.

Safety is our number one priority. We do not tolerate any breaches of health and safety procedures under any circumstances.

Discovering that a sub-contractor tolerates inhumane or unacceptable working conditions for their employees, or employs child labour.

We do not conduct business with organisations that do not provide acceptable working conditions. If you suspect that human rights are not being upheld, you should report this immediately to your manager, your local People Function or Legal Function, a Compliance Officer or through Safecall.

See Whistleblowing on iGMS for contact details.

Being offered gifts or hospitality during a tender process in an attempt to influence a decision.

Our tender processes must always be fair and transparent. Any attempts to coerce or influence decisions must be reported to your manager, your local People Function or Legal Function, a Compliance Officer or through Safecall.

No gifts or hospitality are to be received by employees in the Procurement function and all offers of gifts or hospitality must be recorded in the register.

See Whistleblowing on iGMS for contact details.

Relationships with governments

We act with integrity and transparency in all our dealings with governments and public/government officials.

What it means:

We deliver projects for governments across our jurisdictions. At times we also work with governments and public/government officials to inform and influence public policy. In both capacities, we act with integrity and transparency, complying with each jurisdiction's reporting requirements. We recognise that practices, such as gifts and hospitality, which may be customary between private business partners, may not be appropriate or acceptable between companies and public/government officials. Agents, consultants and other third parties who may represent us are also bound by this Code and any failure on their part to uphold it can result in liability for us. We always carry out appropriate due diligence before engaging third parties to act on our behalf.

We always:

- comply with the laws of the country in which we are operating
- comply with public sector procurement and lobbying laws and regulations
- co-operate fully and courteously with officials making a government or regulatory enquiry
- undertake appropriate due diligence before engaging third parties to represent us
- act with integrity and transparency in relation to any submission we make
- make sure all our interactions with government officials comply with our Code

We never:

- make facilitation payments to government officials even where they are nominal in amount or seen as normal by the officials involved
- review or seek access to documents or information before they are made available to all bidders
- attempt to obstruct the collection of, or destroy or conceal documents requested by an official or which are subject to an investigation
- offer, promise or give any advantage or anything of value to a public official (or their representative) to induce or reward them for acting improperly or for the improper performance of a task or activity in the course of their public responsibilities

Examples:

Attending political fundraisers.

As an organisation without party political affiliation, we do not accept invitations to attend, or donate money to party political fundraisers. We ensure relationship-building with politicians is based on portfolio responsibilities where Laing O'Rourke can assist public debate. If in doubt about the motivations behind any external event, advice should be sought from the Corporate Affairs Portfolio. See page 55 for contact details.

Offering a public official gifts or hospitality after they have told you it's okay.

Be careful to check the appropriate laws of the country you are in, the laws of the UK and any guidelines and procedures issued by your Hub. All gifts and hospitality must be recorded in the register. Be sure to contact the Legal Function for advice.

Being asked to pay for a service which you thought was part of an official's routine job.

Always check the appropriate laws of the country you are in, the laws of the UK and any guidelines and procedures issued by your Hub prior to making any payments to officials. Be sure to contact the Legal Function for advice.

Being asked to shred or conceal documents in advance of an inspection or official visit.

We conduct business in an open and transparent manner and only ever destroy documentation in accordance with our own policies and the law. You should immediately report any such requests to your manager, your local People Function or Legal Function, a Compliance Officer or through Safecall.

Being offered an advance copy of an invitation to tender.

We never accept information which gives us an unfair advantage in a bid process. You should immediately report any such offers to your manager, your local People Function or Legal Function, a Compliance Officer or through Safecall.

See Whistleblowing on iGMS for contact details.

Relationships with customers

We treat our customers with the same respect and professionalism we expect from each other and strive to build strong and lasting relationships that add value.

What it means:

Our **customers** are critical to the success of our business and should be able to expect the same standards from us as we expect from our colleagues and others. We believe that upholding the highest standards of ethical business conduct will enhance our relationships and our reputation.

We always:

- seek to add value for our customers wherever possible and always deliver on our promises
- seek to understand our customers' drivers through due diligence and only work with customers who share our business and ethical standards
- act fairly, transparently and ethically when appointing suppliers and partners
- meet our contractual obligations and work together to resolve any disputes early on
- communicate respectfully, honestly and transparently at all times, seeking to develop strong and lasting relationships

We never:

- forget that meeting our customers' expectations is critical to the success of our business
- ignore concerns raised by our customers regarding the quality of our work
- act unprofessionally when interacting with our customers or their agents or other stakeholders

Examples:

Deliberately misrepresenting facts to a customer in order to gain an advantage in a bid process.

We always act with professionalism and integrity and only conduct business in an open and transparent manner.

Making disparaging or critical comments about competitors when with customers.

While we may work in a commercial environment, we believe in fair competition based on transparency and merit. We do not talk negatively about our competitors. We leave customers to assess organisations based on evidence and value.

Doing the right thing

OUR GLOBAL
CODE OF
CONDUCT

Relationships with customers

We treat our customers with the same respect and professionalism we expect from each other and strive to build strong and lasting relationships that add value.

Our customers are critical to the success of our business and should be able to expect the same standards from us as we expect from our colleagues and others. We believe that conducting ourselves ethically and responsibly will enhance our relationships and our reputation.

Relationships with other stakeholders

We understand that our relationships with all stakeholders are important to delivering a successful outcome for our customers.

What it means:

Other stakeholders may include local residents and businesses, adjacent construction projects, community groups, approving organisations, funding bodies, trade unions and the media. During all of our interactions with others, including through social media, we must remember that we are representing our business, our customers, and our projects and we have a duty to maintain our professionalism at all times.

We always:

- treat members of the public and all other stakeholders with respect
- listen to concerns raised and proactively seek a satisfactory resolution to any issues
- respect the right of freedom of association with others and the right to participate in lawful activities which do not restrict or in any way unduly influence their duties in contravention of the Code
- engage with stakeholders openly to increase our knowledge of related issues to aid planning
- plan our work effectively to minimise disruption to others

We never:

- forget that our reputation depends on how we interact with all stakeholders
- provide unauthorised responses to media enquiries
- forget that when carrying out our work, we are guests in a local community
- influence an employee's decision to join or not to join a trade union

Examples:

Liaising with members of the public.

We act considerately, mindful that we are working within a local community. We are professional at all times and provide timely and relevant information where we are permitted to do so.

Being approached by a member of the media outside the site.

Politely refer the enquirer to the relevant media desk or ask for their contact details and pass them on to the Corporate Affairs Portfolio. See page 55 for contact details.

A protest is taking place outside your workplace.

Be aware of any changes to access or egress arrangements during the protest. Remain professional and continue with your activities where it is safe to do so.

Section 2

Working with each other

We believe our high standards deliver an industry-leading health and safety culture; we know that our good safety behaviour is admired and respected across the industry. At all levels within the company we want everyone to make safety personal.

We are committed to creating an environment where everyone is treated with honesty and respect. We all have a unique blend of experience, talents and perspectives and this diversity is one of our business strengths.

- We want a business that sends everyone home safely every day
- We aim to create an environment in which everyone can reach their potential, promoting a culture of dialogue throughout the company
- We reward and promote our employees on the basis of skills, good work and merit
- We protect our workers from all forms of harassment and remove barriers to equal opportunity
- We treat all third parties with respect and dignity
- We promote and protect human rights wherever we operate

In this section

- Health and safety 31
- Drugs and alcohol 32
- Diversity and inclusion 34
- Harassment and bullying 35
- Human rights and modern slavery 36

Am I doing the right thing?

Health and safety

Drugs and alcohol

Diversity and inclusion

Harassment and bullying

Human rights and modern slavery



Health and safety

We will not compromise the safety of anyone involved in or affected by our operations; health and safety is central to the success of our business.

What it means:

We constantly strive to make safety our highest value. We can only truly achieve this through a holistic approach of Rethinking Safety Through Inclusion + Wellbeing.

Inclusion – ensuring everyone (not just operational teams) has a safety voice and a part to play in our safety journey.

Wellbeing – ensuring we consider our people's holistic health and safety and that we demonstrate genuine care for their physical and mental wellbeing.

Inclusion + Wellbeing is built on three pillars.

- **Engineered Safety** – Engineered Safety is about **engineering out risk and engineering in health** at every stage of the project lifecycle. This is achieved through working closely with our design consultants and employing a **modern methods of construction** approach.
- **Delivery Excellence** – Delivery Excellence ensures a robust implementation of our **leading standards** and **H&S management system**, where we will champion consistent engagement with our workforce. This is underpinned by clear lines of **operational accountability** and **competence**.
- **Human Performance** – Human Performance is how we enable our people. We will create a working environment that **supports people's holistic health**, enabling them to sustain high performance by managing their **personal energy and capacity levels**.

We always:

- create safe working environments for all
- protect the safety, health and mental wellbeing of everyone involved in our operations
- focus our attention on normal work and why it goes well, learning from success

- recognise that work very seldom goes to plan and it is our innovation and skills that conclude works safely
- seek the knowledge of those with the skills and experience to undertake activities when planning and preparing works
- lead by example, foster trust through engagement and empowerment, listen to and consider everyone's views before starting work demonstrating a positive commitment to safety and facilitating others to do the same.

We never:

- prioritise other objectives over health and safety
- accept the prevailing view that construction is inherently dangerous which means that it is acceptable to expose people to high levels of risk
- dismiss the views of supervisors and the workforce in preparing for work
- intentionally create unnecessary process or paperwork that adds no value to the works
- ignore unsafe behaviours or conditions

Examples:

Witnessing a colleague undertake an unsafe practice.

Always speak out against unsafe behaviours or conditions. Lead by example, demonstrate a positive commitment to safety and inspire others to do the same.

Taking a shortcut because it will save time or money.

Always follow the rules and procedures. Safety is the number one priority regardless of any other considerations.

Seeing something that you just aren't sure about.

If you aren't sure, stop and ask. Recognise your personal responsibility for your safety and that of others.

Drugs and alcohol

We are committed to reducing the risk of harm to any individuals who could be affected by our work, by identifying through either random or for cause testing those who may present a risk following the misuse of alcohol or drugs.

What it means:

Laing O'Rourke has a strict policy on the use of alcohol and drugs while on duty or on Laing O'Rourke premises, anywhere in the world. This extends to employees, clients, consultants, trade contractors or anyone engaged as a "worker" and you may be selected for testing at any time. Breaches of this policy will result in disciplinary action and/or dismissal and may include criminal proceedings.

We have set control measures in place to prevent, as far as reasonably practicable, individuals from working or entering work premises while under the influence of drugs or excess alcohol, or from consuming these at work or during working hours.

We always:

- advise pharmacists and medical practitioners of our policy when being prescribed medication and, on the advice of the medical practitioner, notify management about any possible impact on health and safety at work, the ability to safely operate plant and equipment, and the risk to others in the workplace
- present ourselves fit for work and never in a condition which could compromise anyone's safety
- take suitable action – up to and including dismissal or termination of contract – against anyone testing positive for alcohol or drugs in breach of an applicable policy

We never:

- consume alcohol or drugs that impair our ability to work safely while undertaking work activities
- ignore signs of a colleague/supplier appearing to be under the influence while undertaking their work duties. This can seriously compromise the safety and lives of others and as such must be reported

Examples:

Colleagues or co-workers smelling of alcohol, slurring speech and appearing unsteady.

If you suspect someone of being under the influence, you must report it immediately to your manager, Occupational Health, your local People Function or Legal Function, a Compliance Officer or through Safecall.

See Whistleblowing on iGMS for contact details.

Colleagues or co-workers telling you they may have an alcohol or drugs problem.

Support is available and you should first try to convince the individual to approach their manager to obtain help. You should not allow a colleague or co-worker to work on site if you believe that their safety or the safety of others is at risk. In such circumstances you should inform your manager or supervisor immediately.

Taking prescription drugs which may impair your ability to do your job.

You must disclose to your line manager or the Occupational Health Department, any prescription drugs which could potentially impair your abilities at work. This is critical in ensuring a safe working environment for you and your colleagues. If you are unsure how these drugs may affect your abilities at work you can use the Chemist on Call service via the Occupational Health Department.

Doing the right thing

OUR GLOBAL
CODE OF
CONDUCT

Diversity and inclusion

Laing O'Rourke is committed to building a more diverse workforce and ensuring we have a fully inclusive culture across our global business.

At Laing O'Rourke we call it out, we intervene and we connect.

Diversity and inclusion

Laing O'Rourke is committed to building a more diverse workforce and ensuring we have a fully inclusive culture across our global business.

What it means:

When we go to work, we should feel we are going to a place where we are accepted, understood and valued. Just as importantly, we should go to work committed to making others feel the same way.

At Laing O'Rourke we call it out, we intervene and we connect.

We always:

- speak up when we see unfair and non-inclusive practices
- encourage different opinions and welcome challenges to our ideas
- treat innovation and excellence as a team sport, where everyone gets to play
- recognise and reward leaders who create work environments that embrace diversity and promote inclusion
- allow everyone the opportunity to contribute and develop, regardless of their identity
- trial new working patterns to drive productivity, sustainability and engagement - and celebrate success
- work with like-minded clients on projects that shape the future for a more inclusive industry

We never:

- let assumptions about others inhibit our decision-making or limit our ability to empower our people to succeed
- allow women to face the barriers that have endured in our male-dominated industry

Examples:

Promoting or rewarding someone on grounds other than merit.

We reward and promote our employees on the basis of skills, good work and merit.

Accidentally or deliberately excluding someone from opportunities, for example by holding leadership meetings when employees with caring responsibilities cannot attend

We consider others' diverse schedules and include the whole team wherever possible.

Feeling that you were treated unfairly or not given an opportunity that you deserved.

Raise any concerns with your manager or, if you feel more comfortable, your local People Function or Legal Function, a Compliance Officer or through Safecall.

See Whistleblowing on iGMS for contact details.

Harassment and bullying

We are committed to providing a working environment free from harassment and bullying and ensuring all staff are treated, and treat others, with dignity and respect.

What it means:

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Bullying can take the form of physical, verbal and non-verbal conduct.

Harassment and bullying can occur at work and out of the workplace, such as on business trips or at work-related events or social functions. Our policy covers harassment and bullying by staff and also by third parties, such as customers, suppliers, or visitors to our premises.

We always:

- speak up and support co-workers who may be being harassed or bullied
- take complaints of harassment and bullying seriously and take appropriate action
- protect and support those who raise a complaint in good faith

We never:

- accept harassment or bullying behaviour or attempt to justify it as humour
- threaten a colleague, supplier, customer or other third party with physical violence
- engage in or accept harassment of a sexual nature
- allow retaliation or victimisation of an employee who raises a complaint in good faith or who participates in an investigation

Examples:

Witnessing others share or pass on inappropriate jokes or images.

We encourage you to speak up if you witness such behaviour. You can report it to your manager, your local People Function or Legal Function, a Compliance Officer or through Safecall.

See Whistleblowing on iGMS for contact details.

Making racist jokes, even if no one from that ethnic group is present.

This can create an offensive environment and a person may be harassed even if they were not the intended 'target'.

Making legitimate, reasonable and constructive criticism of a worker's performance or behaviour.

This alone does not amount to bullying.

Treating someone less favourably because they have made a complaint of harassment.

Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action.

Human rights and modern slavery

We are committed to upholding the human rights of all those who work with us and for us and ensuring that they are able to work freely and receive fair pay in return.

What it means:

Laing O'Rourke supports the principles set out in the United Nations Universal Declaration of Human Rights, and expects its suppliers and supply chain to do the same.

We always:

- create safe working environments for all
- follow the labour laws of the countries in which we operate and protect the rights of all workers, including migrant workers
- comply with minimum wage and minimum age requirements
- adhere to regulations regarding maximum working hours
- listen when legitimate concerns are raised, and whenever possible take appropriate action to address them
- ensure adequate welfare facilities are available

We never:

- tolerate the use of forced, debt-bonded, indentured or trafficked labour
- exploit anyone
- allow anyone to be exploited in our name
- do business with any individual, or organisation that does not support basic human rights
- influence an employee's decision to join or not to join a trade union

Examples:

Discovering that a supplier tolerates inhumane or unacceptable working conditions for its employees, or employs child labour.

We do not conduct business with organisations that do not comply with our labour standards. If you suspect that human rights are not being upheld, you should report this immediately to your manager, your local People Function or Legal Function, a Compliance Officer or through Safecall.

See Whistleblowing on iGMS for contact details.

Discovering that a supplier is forcing their employees to work beyond maximum hours in order to improve earnings on a contract.

We never put profit before the wellbeing and safety of our employees and expect the same legal standards are met by our suppliers. If you suspect such wrongdoing you must speak up to your manager, your local People Function or Legal Function, a Compliance Officer or through Safecall.

See Whistleblowing on iGMS for contact details.

Section 3

Our responsibilities as a global company

We are committed to operating a sustainable business by complying with social, economic and environmental laws and regulations, alongside developing stringent standards of our own.

- We care about our people, our communities and the environment we inhabit
- We comply with the relevant laws and permits in the countries where we operate and apply our own standards if these are higher
- We are committed to developing high-quality products and services as part of our wider effort to change the poor image of the construction industry worldwide

In this section

- Environmental sustainability 39
- Respecting communities 40
- Charities and not-for-profit organisations 41
- Tax compliance and transparency 42

Am I doing the right thing?

Environmental sustainability

Respecting communities

Charities and not-for-profit organisations

Tax compliance and transparency



Environmental sustainability

Everything we do has an impact on the environment and inherently, this has an impact on us and the communities we serve. We will work to stringent standards to make a positive contribution to environmental protection, whilst understanding the wider impacts of our operations.

What it means:

We care about our world and the sustainable transformation of our industry. We will look to contribute to sustainable outcomes balancing social, environmental, and economic considerations through our operations and our supply chains.

We always:

- regard environmental sustainability performance as a business and stakeholder priority and use our Responsible Decision Making (RDM) framework to guide business decisions
- build innovative and strategic partnerships to develop our business processes and lead the change in our industry
- comply with environmental legislation and other requirements, as a minimum
- identify environmental risks and opportunities, understand them and act on them accordingly
- optimise design by applying the mitigation hierarchy to eliminate waste and create circular economies
- prioritise the use of materials and services that are sustainable with the lowest whole-life environmental impact
- minimise our environmental impact through efficient use of resources in all our operations and the products and services we provide
- incorporate climate change resilience into the assets that we build and our own business operations
- source materials locally from sustainable, certified sources
- respect, protect and aim to enhance the environments we work in

- consider the impact of our operations on the community we are working in and look for ways to minimise nuisance

We never:

- knowingly act complacently towards the environment
- ignore the impacts of our live and future activities and projects on the environment

Examples:

A lack of consideration for environmental issues during project planning, design or implementation.

At every stage of a project we must always consider how our activities affect the planet, communities, our people and our net-zero future. We must always seek ways to minimise our impact upon the environment. This is an integral part of the initial project planning and delivery phases and must be undertaken according to the environmental management process within iGMS.

Disposing of substances or materials in a reckless or inappropriate way.

In accordance with the law and our environmental management processes we must always safely handle, transport and arrange the disposal of raw materials, products and waste in a responsible manner with minimal impact upon the environment.

A contractor or third party (working on our behalf) exhibits poor environmental practices.

We only work with organisations who comply with environmental legislation, our own environmental management requirements and this Code. If you have any concerns regarding contractor behaviour, speak to your line manager or a member of the Environmental Sustainability team.

Respecting communities

We have developed a new approach to social value, placing people and communities at the heart of what we do. Our goal is to maximise the socio-economic benefits of our projects and give our people and communities the support they need to thrive.

What it means:

Our projects offer opportunities to address social, economic and environmental challenges in the surrounding communities. This might include creating sustainable employment for local people, increasing the skillsets of the local workforce, providing apprenticeships, utilising local supply chain partners or enhancing community green spaces. We are committed to maximising local benefits and supporting local communities to thrive.

We always:

- assess local needs and aim to address the socio-economic issues most important to the communities in which we work
- prioritise long-term, legacy benefits
- ensure our social activities have a positive impact on those who are most disengaged or underrepresented within our industry
- maximise the sustainable employment of local people
- support and build capability and capacity in local supply chains
- raise the profile of the construction industry and attract future talent
- work with local partners to increase health and wellbeing
- enhance community green spaces and maximise environmental net gain
- build lasting, mutually beneficial relationships with local stakeholders
- help supply chain partners maximise their own social value offering
- measure and report the social impact of our activities and initiatives

We never:

- ignore the opportunities our projects present to local people and communities
- take the short sighted, quick fix option

Examples:

Employ agency workers on zero hours contracts with little training or development.

Offer pre-employability training to local people leading to high quality, sustainable employment with opportunities to learn, develop and progress within our business.

Fail to identify and address rising unemployment in the communities in which we work.

The construction skills gap presents a serious risk to all construction and engineering businesses. We must do all we can to inspire, attract, recruit and sustain the employment of our future workforce. This may be through our pre-employability programmes, school engagement activities, and early talent programmes, such as trade and technical apprenticeships, professional apprenticeships, summer and industrial placements and graduate development programme.

A local business is interested in supporting project delivery but struggles to join our supply chain.

Our projects offer local businesses the opportunity to grow and develop. This in turn creates more employment opportunities, retains project spend within the community and maximises socio-economic benefits through the local multiplier effect. We must ensure supply chain opportunities are open and accessible to local businesses and support SMEs and third sector businesses onto our supply chain.

Charities and not-for-profit organisations

We aim to have a positive and long-lasting effect in the communities in which we live and work: a legacy that will be of benefit for many years.

What it means:

We support a small number of charities at a corporate level and encourage our teams and employees to complement our fundraising endeavours. In addition, we encourage our employees to engage with charities that are aligned with our sustainability agenda and are within the communities in which we work.

We always:

- actively support appropriate charitable initiatives and other non-profitable organisations and encourage our employees to participate too, giving them the opportunity during working hours to share their time and expertise
- ensure a charity is appropriate, bona fide and correctly registered
- obtain prior approval before making any financial or other contributions
- assess any potential conflict of interest before committing to a charitable cause

We never:

- use charitable donations or sponsorship as incentives or rewards for obtaining or retaining business
- make a donation or offer sponsorship without checking it is suitable and appropriately administered
- use charitable donations to influence political decisions

Examples:

Making charitable donations to organisations which are closely linked to suppliers, clients, government officials or any external stakeholders that could be interpreted as a conflict of interest.

We do not make donations to charitable organisations or individuals as a way of obtaining a business advantage, either directly or through intermediaries. Always seek approval from senior management before making any charitable donations on behalf of the company. In some circumstances, such payments could be misconstrued as bribes or extortion.

Tax compliance and transparency

We take our social and economic responsibilities seriously and pay the correct amount of tax when it is due in the countries where we operate.

What it means:

We are committed to global compliance in our financial and tax affairs, which is evidenced by our behaviours with the tax authorities and our annual report and accounts. We maintain a clear and simple policy on tax and embed this throughout our organisation.

We always:

- pay the correct amount of tax when it is due
- present our consolidated accounts transparently and place them in the public domain via our website
- collect all other taxes and social security contributions from our employees and subcontractors and pay them over to the appropriate tax authorities promptly
- have our accounts independently audited
- seek to resolve any enquiries from tax authorities into our tax liabilities quickly and proactively

We never:

- knowingly make false or misleading entries to reduce our tax bill
- ignore concerns raised to us about our tax obligations
- knowingly assist employees or any third parties to evade taxes

Examples:

Being vigilant in our tax affairs.

We continuously monitor and review our financial system and processes to ensure we remain fully compliant with our tax obligations.

Dealing openly and honestly with tax authorities.

We take care to fully investigate and clearly explain our actions and tax return entries if enquiries are made by tax authorities.

Reporting transparently to the public.

We fully comply with the International Accounting Standards on Tax, have that reporting audited and place that report in our annual report and accounts, which is available on our website for all to review.

A supplier wants to be treated as self-employed to reduce their tax costs. You are asked to enter false information on the Employment Status Questionnaire so that they will be assessed as self-employed.

You must not do this – you would be knowingly helping the supplier to evade tax. This is a criminal offence. If you are in any doubt when completing tax related documentation, contact a member of your local Tax Function or Legal Function or a Compliance Officer.

See Whistleblowing on iGMS for contact details.

Section 4

Keeping assets and data safe

When we are entrusted with personal information and company data, we have a duty to keep it safe. This section sets out our responsibilities in this area.

- We respect and safeguard confidential and personal information
- We use computer systems and communication devices appropriately
- We are transparent in our communications and our dealings with key opinion formers
- We record all financial transactions completely, accurately and honestly

In this section

- | | |
|---|----|
| • Protecting personal information | 45 |
| • Safeguarding confidential information | 46 |
| • Use of IT and communication systems | 47 |
| • Financial controls and record keeping | 48 |
| • Protecting company assets | 49 |
| • External communications | 50 |

Am I doing
the right thing?

Protecting
personal
information

Safeguarding
confidential
information

Use of IT and
communication
systems

Financial
controls
and record
keeping

Protecting
company
assets

External
communications



Protecting personal information

We observe the laws of the countries in which we operate that protect the privacy of individuals by regulating the collection and use of personal information.

What it means:

We collect personal information necessary for us to manage our business effectively.

Personal information is information from which a person's identity is apparent. It could include information such as names, addresses, salaries, health records, and other personal information of our people, or the people we do business with. Data protection and privacy laws vary from country to country. Wherever we are entrusted with personal information we will abide by a country's laws and our own standards where these are higher. Individuals trust us with their data: if we fail to look after their data, we risk destroying that trust.

We ensure that personal data is protected by appropriate technical and organisational measures.

We always:

- respect and safeguard personal data
- collect only the personal data we need, informing individuals why we need it and only using it in a way that is consistent with that purpose.
- only use and disclose personal data responsibly and in accordance with applicable legislation
- take reasonable precautions to hold and dispose of personal data securely, and protect it from unauthorised disclosure or modification
- take immediate action if we think personal data may have been compromised

We never:

- keep personal data for longer than necessary for the purpose for which it was collected
- transfer personal data without appropriate safeguards in place to protect the integrity of that data

Examples:

Inadvertently sharing personal information about another colleague.

Be careful to ensure you protect your colleagues' information as well as your own by adhering to our security standards.

Throwing hard copy documents containing personal data in the general waste bin.

Always securely dispose of personal information (subject to legal obligations regarding retention) to prevent unauthorised access, distribution and manipulation.

Using an unencrypted laptop for Laing O'Rourke work off-site.

Always use the correct precautions with regards to electronic communications when working outside of Laing O'Rourke's closed network. If in doubt, contact your local IT Function.

Sharing personal data held by Laing O'Rourke with a third party.

Check that a recipient organisation is authorised and appropriate to hold or process that data and that we have the right to share it. If in doubt, contact your local Legal Function.

See Whistleblowing on iGMS for contact details.

Safeguarding confidential information

We keep confidential information safe and protect it from unauthorised disclosure.

What it means:

Confidential information will include any information or document that a business or individual wishes not to make public.

It will usually include information about a business's financial information, business or marketing strategies, tender documents, pricing policies and customer, supplier or employee information.

We apply the same standards of confidentiality to confidential information entrusted to us as we do to our own.

We always:

- adhere to our information security policies when storing, using or exchanging confidential information
- safeguard any confidential information disclosed to us
- take immediate action if we think confidential information may have been compromised
- make sure our partners, suppliers and customers protect our confidential information

We never:

- elicit or seek to discover confidential information improperly from others
- leave confidential information unsecured or unattended
- discuss confidential information in a public place where it can be overheard
- disclose confidential or commercially sensitive information we receive to third parties inappropriately or who we know are not authorised to receive it

Examples:

Arranging a meeting or answering a call in a public place without considering confidentiality issues.

Always be mindful of who might be listening to conversations and never conduct highly sensitive business in areas where confidentiality could be compromised.

Being invited to look at confidential documents not intended for you.

Viewing a confidential document which is not intended for you or which has been obtained improperly can be an illegal activity or preclude the company from bids or existing business.

Sharing confidential information electronically without taking steps to safeguard it.

Make sure you have taken the correct precautions with regards to electronic communications when sending information from within or outside of Laing O'Rourke's closed network. If in doubt, contact your local IT Function.

Use of IT and communication systems

We use our IT and communications systems appropriately and responsibly.

What it means:

Our IT and communications systems are intended to promote effective communication and working practices. Misuse of IT and communication systems can damage and disrupt business operations, disclose sensitive data to unauthorised parties and damage our business reputation. Everyone has a responsibility to ensure that they are used responsibly.

We always:

- follow our information, security and acceptable use policies
- take steps to protect our IT and communications systems and assets against loss, damage or theft
- complete all security training and awareness courses assigned within the allotted time
- report any loss of IT equipment promptly
- report any security incident or data breach to the service desk immediately
- apply updates from mobile phone/tablet vendors when available

We never:

- abuse the privileges granted to us
- use the company IT and communications systems for any inappropriate or illegal purpose. This includes accessing, downloading or disseminating material which is offensive, sexually explicit, defamatory, discriminatory, or racially or otherwise abusive
- store information that has been gained illegally on our systems
- share our username or password with anyone, including colleagues and the IT helpdesk

- install software without written permission from IT
- register a Laing O'Rourke email account on a non-business cloud service

Examples:

Giving a colleague your login details so they can access information when they are not authorised to do so.

You must never pass your login information to anyone – including colleagues – as you will be held responsible for any activities undertaken with your login details.

Downloading illegal copies of software to your company laptop.

You must only use licensed software which is provided to you from the IT Function. If you require additional software you must discuss with your line manager and IT Function. Never download illegal copies as this is a serious breach of policy.

Browsing sites with inappropriate content using a company device.

This is a serious breach of the acceptable use policy and may result in disciplinary action being taken.

Creating an account on an online dating service with your Laing O'Rourke email address.

This is a breach of the acceptable use policy and exposes corporate data (user credentials).

Clicking on a random web link in an unsolicited email.

Use the “Report Phishing” button to report suspicious emails.

Financial controls and record keeping

We ensure we have suitable financial controls in place and that our records and reporting processes are complete, accurate and transparent.

What it means:

Ensuring the integrity and transparency of our financial controls and records is essential, regardless of whether the information is for internal or external scrutiny. It safeguards our credibility and reputation and protects us, our customers and partners.

We always:

- maintain and present financial records in accordance with the laws of each country we operate in and in accordance with the required accountancy standards
- ensure any figures we record are accurate and can be substantiated
- process transactions only in accordance with our delegated authority or once specific approval has been received
- comply with any applicable document retention and disposal policy
- co-operate fully with internal and external auditors

We never:

- knowingly make a false or misleading entry in a report, record or expense claim
- knowingly fail to record any transaction or expenditure or record it in an ambiguous or misleading way
- knowingly establish or maintain any undisclosed or unrecorded accounts, funds or assets (including scrap metal and damaged equipment)
- sell, transfer or dispose of company assets without proper documentation and authorisation
- knowingly record things in the wrong place or way, even if the customer requests it

- destroy or alter any information or data that must be kept for an investigation or for legal reasons

Examples:

Being tempted to manipulate figures on an expense claim.

We never knowingly make a false or unsubstantiated claim. Record all information accurately, honestly, in line with the expenses policy and according to the law.

Ignoring an “irregularity” in a report or invoice so as not to question someone above you.

We must always ensure that figures are accurate and any discrepancies should be highlighted and resolved, regardless of who they have come from. Always raise any concerns that you may have.

Changing or adapting records because a client or third party requested it.

We never record things in the wrong place or the wrong way, no matter who requested it. Records must be accurate, honest and compliant with the law. Never destroy or alter any data that must be kept for an investigation or for legal reasons.

Protecting company assets

We value all our assets and resources – tangible and non-tangible – and will protect them from improper use.

What it means:

Our assets include physical assets, such as property, materials, personal equipment and company funds, as well as non-tangibles, such as reputation, intellectual property, business plans and marketing strategies. We also consider employee time and talents as assets which should not be misused.

We always:

- take great care when spending money on the company's behalf
- treat company property with respect and use assets and resources appropriately
- avoid excessive waste and look for more efficient ways of allocating resources
- manage intellectual property, including rights, patents and know-how, effectively
- consider potential disruption to our operations and put plans in place to mitigate this should it occur
- take personal responsibility for security and challenge and report anything we believe compromises security

We never:

- condone theft, misuse or misappropriation of company assets or property
- use the company's property for personal use beyond the limits allowed in our policies
- misrepresent or abuse expenses or claim for sums not spent on legitimate company business
- knowingly infringe third-party intellectual property rights
- assume security is someone else's responsibility

Examples:

Borrowing company property with a view to giving it back later.

Company property should never be taken for private use unless express prior approval has been given by your senior manager in accordance with our policies and procedures.

Discussing confidential business developments with people outside the company.

We never disclose confidential information to anyone outside of the company or project partners without appropriate safeguards in place.

Committing the company to an unnecessary financial agreement.

All financial bids and agreements must be authorised through the appropriate channels.

Claiming back money that you didn't actually spend on business expenditures.

This is a serious breach of the Code and if found guilty of deliberate wrongdoing can result in disciplinary action and/or dismissal. Obtaining money by deception is a crime in many countries.

External communications

Our communications will be timely, honest, accurate, engaging and not misleading.

What it means:

We pay careful attention to how we communicate – releasing corporate and financial information in a timely manner, honestly and without misrepresentation. Even when the information might be unfavourable towards us we communicate with integrity. We believe the way we communicate and the way we talk about ourselves impacts on how people see us and how much they trust us. We communicate with people in an engaging manner, choosing the most effective channel or medium, always listening respectfully to feedback.

We always:

- ensure our communications are honest, accurate, engaging and not misleading
- obtain prior approval before releasing information into the public domain
- refer any enquires from the media to the Corporate Affairs Portfolio
- take care in public situations, including online through social media, where what we say could be interpreted as being the company's view

We never:

- express personal views in person or on social media in a way which might be inaccurately interpreted as the company's views
- respond to the media, regulators, government officials or any other external broadcast channel without prior permission from the Corporate Affairs Portfolio
- write or say anything which might embarrass our clients or damage our relationship with

them or forget that electronic communications are legally admissible in court

Examples:

Being asked to approve press releases or endorse marketing material from other organisations that contain references to Laing O'Rourke.

Always refer any information which will be released into the public domain to the Corporate Affairs Portfolio for approval.

See page 55 for contact details.

Posting project updates and photographs to personal social media pages such as LinkedIn and Twitter.

Share content that has already been posted on official Laing O'Rourke social media channels. Always make sure that work-related information you are about to post has been approved for external release. If in doubt, check with the Corporate Affairs Portfolio.

See page 55 for contact details.

Being asked to comment on a government policy in a meeting.

Take care in public and business situations where what you say could be interpreted as the company's view.

Section 5

References

Here you can find definitions of common terms used in the Global Code of Conduct.

In this section

- Glossary of terms 53
- Index of issues 54
- Further information 55

Am I doing
the right thing?

Glossary of
terms

Further
information

Index of
issues



Glossary of terms

Bribery

The provision or receipt of anything of value (financial or otherwise) in order to improperly influence or reward any action or inaction of any person in the performance of their duties.

Charitable donations

Anything of value given to a registered charitable organisation, sponsorship that is given without charge to a registered charity, or any community development expenditure.

Clients

Customers and buyers of Laing O'Rourke products and services.

Competitor

A company in the same industry offering a similar product or service.

Compliance Officer

Monitors compliance activities including incidents and business risk.

Confidential information

Information and data that must be protected and not shared with any unauthorised party.

Conflict of interest

A conflict of interest can include personal, business or financial relationships, potentially compromising someone's judgement, loyalty or independence.

Corporate Affairs Portfolio

Office of the CEO and the Corporate Communications Team

Corruption

The abuse of a position of power or responsibility for profit.

Doing the Right Thing – Our Global Code of Conduct

Guidelines setting out the behaviour and ethical standards expected of you and what you can expect of Laing O'Rourke.

Embargoes or prohibitions

Limits that govern what can and cannot be done, such as the kinds of goods that are allowed into a country.

Facilitation payment

Usually a small payment (or gift) made to public officials in order to speed up or "facilitate" actions they should already do as part of their routine job. It doesn't include fees required to be paid by law for the service.

Improper performance

Improper performance is a failure to perform a function or activity in good faith, impartially or in accordance with a position of trust. This can include not performing the function at all, performing it incompletely, or only performing it in return for facilitation payments. A local custom or practice is not improper if it is expressly permitted or required by the local laws.

Intellectual property

Includes patent rights, utility models, trademarks and service marks, domain names, copyright (including copyright of software), design rights, database extraction rights, rights in know-how or other confidential (sometimes called trade secret or proprietary) information, and rights under IP-related agreements.

Items of nominal value

Items of insignificant value, such as a conference pen or cup of coffee.

Joint venture

A legal arrangement formed between Laing O'Rourke and other parties to undertake a business activity together.

Money laundering

Dealing with property (whether cash or anything else of value) which a person knows or suspects may be criminal property (i.e. property which has been obtained through criminal conduct) anywhere in the world.

Partner

A supplier, customer, agent or any party involved in any joint venture with Laing O'Rourke.

Public official

Employee of any government (local or national), or of a company wholly or partially controlled by government, or an official of a political party, or employee of an international organisation, or an immediate family member of any of these.

Safecall

Available to all employees and stakeholders for illegal and ethical non-compliance incidents, dilemmas and concerns.

Stakeholder

Person, group, organisation or system that has an interest in Laing O'Rourke's activities.

Supervisor

The person who has the authority to give you instructions and/or orders.

Suppliers

Person or organisation that provides goods or services to Laing O'Rourke including, but not limited to, material suppliers, subcontractors and consultants.

Tax

All forms of taxation due from or collected by the Group, including local or national government charges, duties and levies, and social security payments.

Index of issues

Anti-trust law	22
Bribery	15, 25
Bullying	35
Charities	41
Confidential information	22, 46, 49
Conflicts of interest	10, 19, 20, 21, 41, 55
Communications	47, 50
Communities	34, 37, 40, 41
Competition	22, 27
Corruption	15, 25
Customers	3, 27, 28
Deception	16, 49
Dishonesty	16
Diversity	29, 33, 34
Drugs and alcohol	32
Due diligence	17, 21, 23, 26, 27
Environment	37, 39, 40
Equality	29, 33, 34
Fraud	16
Gifts	10, 15, 20, 21, 26, 55
Government	26, 40, 41
Harassment	29, 35
Health and safety	25, 29, 31, 32
Hospitality	7, 10, 15, 20, 25, 26, 55
Human rights	25, 29, 36
Inclusion	33, 34
IT and communication systems	43, 45, 46, 47
Money laundering	17, 18
Not-for-profit organisations	41
Personal information	3, 43, 45
Protecting company assets	43, 47, 48, 49
Record keeping	16, 21, 43, 48
Responsible sourcing	39
Stakeholders	28, 39, 40
Suppliers	7, 15, 17, 19, 20, 21, 22 23, 25, 36, 39
Tax	23, 24, 42
Trade and export controls	23, 24
Whistleblowing	7, 9

Further information

A variety of policy documents support our Global Code of Conduct. These expand on the issues covered by the Code and help define the ethical standards that we expect from all employees. All policies are available on iGMS.

Raising a concern using Safecall

Our dedicated phone line for reporting breaches of the Code is independently run, with trained operators available 24/7. It is confidential.

Australia 1800 312 928

Canada 1877 59 98073

Hong Kong 3077 5524

UAE 80004413376

UK 0800 915 1571

Online at: www.safecall.co.uk/report

Or email: lor@safecall.co.uk

Media enquiries:

Europe Hub: pressoffice@laingorourke.com

Australia Hub: communications@laingorourke.com.au

Doing the right thing

OUR GLOBAL
CODE OF
CONDUCT

We expect everyone working at Laing O'Rourke to do the right thing and help us all maintain the highest standards of conduct in all our dealings.

Laing O'Rourke plc

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