

ANTI-BRIBERY AND CORRUPTION

Laing O'Rourke understands that the establishment of our business strategy and delivery of our business objectives can only be achieved by carrying out business openly, honestly and with integrity. We are accordingly committed to complying with legislation prohibiting **bribery** and **corruption** wherever we work. Breaches of this policy may result in disciplinary action up to and including termination of employment.

This policy forms part of our global policy framework, underpinned by 'Doing the Right Thing', our Global Code of Conduct.

This goal will be realised by:

- Prohibiting **bribery** and **corruption** in all forms (including **facilitation payments** or any other attempt to influence **foreign public officials** in the conduct of their duties with a view to obtaining a business advantage). We have a 'zero tolerance' policy towards them. We are committed to doing business the right way and will not do business at any price.
- Ensuring that we understand and comply with the anti-**bribery** and **corruption** laws applicable to Laing O'Rourke in the jurisdictions in which we operate.
- Training employees to ensure they understand the standards expected of them.
- Implementing effective due diligence procedures so that we understand who our clients, suppliers and other business partners are.
- Ensuring that effective arrangements are in place to allow employees to 'speak up' where they have concerns about **bribery** and **corruption**, and to ensure that such concerns are investigated appropriately.
- Ensuring that no employee who uses our 'speak up' procedures is subject to victimisation as a result of reporting any suspicion of **bribery** or **corruption**.
- Ensuring that procedures and approvals for political contributions and gifts and hospitality are appropriate and that procedures are complied with.
- Implementing effective controls to prevent **facilitation payments** (except where the facilitation is paid when in fear for personal safety or liberty).
- Ensuring appropriate oversight of our anti-**bribery** and **corruption** programme.
- Reviewing this policy regularly to ensure its effectiveness.

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

Foreign public officials means an individual who holds a position exercising a public function outside the country in which you are working.

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

Facilitation payments means a payment made to speed up decisions or actions by government agencies or officials which should be made as part of their routine job.

Laing O'Rourke expects compliance with this policy across its global operations. This is necessary to protect our business and our employees. This policy applies to all employees and officers of Laing O'Rourke. Overall responsibility for this policy rests with the Board of Directors of Laing O'Rourke.

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



Sir John Parker GBE
Chairman