

Note: Question 11 provides the company with the opportunity to describe challenges confronted in the areas covered by the preceding questions.

Where possible, please attach or provide a hyperlink to the policies and standards you refer to in your answers.

- 1. Social responsibility or human rights policy:** Does your company have a publicly available commitment to human rights or to social responsibility? If so please share the link.

Laing O'Rourke's Global Code of Conduct is integral to the way we do business and underpins our Group Vision and Values. It sets clear expectations for everyone in the company to ensure we conduct our business affairs with the utmost integrity.

Section 2 of the Code of Conduct articulates that we are committed to upholding the human rights of all those who work with us and for us and that we comply with international conventions regarding human rights.

Laing O'Rourke upholds the principles defined by the United Nations Universal Declaration of Human Rights and will always follow the labour laws of the countries in which we operate, protecting the rights of all workers, including migrant workers.

The full Code of Conduct can be read [here](#).

- 2. Scope of operations:** Please describe the nature and scope of your company's operations in the UAE, including reference to current projects and business partners (herein 'business partners' inclusive of sub-contractors, suppliers, and joint ventures).

Laing O'Rourke is a globally diverse engineering and construction group with a commitment to delivering exceptional value, founded on 167 years of experience. We have been operational in the Middle East since 1977 and have undertaken vast numbers of projects for public and private clients. Some of our notable projects in the region include Deira Towers (1978), Al Nahda Interchange (1984), Creek Golf Club (1991), National Bank of Dubai (1997), Dubai International Airport (2003), Ski Dubai (2004), Atlantis (2006) and Al Raha Beach Development (2011). We are currently constructing the Motion Gate Project for Dubai Park & Resorts.

More information about the company can be found on our website <http://www.laingorourke.com>

- 3. Sub-contracting:** How many workers do you hire directly and how many are hired by sub-contractors?

Laing O'Rourke employs over 3,000 workers directly in our Dubai business. Where short-term assignments are required, we complement our directly employed workforce through subcontracting.

4. Health and safety:

In direct operations and in contracts with business partners:

- a) What is your company's approach to ensuring workers' health & safety in the UAE?

At Laing O'Rourke, we take our responsibilities seriously – and none more so than health and safety. No other matter – commercial or operational – takes precedence over the wellbeing of those involved in or affected by our activities. We have set ourselves the target of eliminating all accidents from our operations. This is an ambitious goal. But we are confident we can achieve it through the commitment of all our people putting health and safety first in everything they do.

We place the health, safety and wellbeing of all employees at the heart of the business, demonstrated through leadership and commitment to ensure we provide a safe and healthy working environment. Regardless of our legal responsibilities we have a moral duty to ensure that everyone who could be affected by our operations returns home safely every day.

Laing O'Rourke believes that people are the solution and not the problem, and will only engage with clients and contractors that have the same values. Our approach to health and safety is based on the idea of personal commitment and individual empowerment. Our industry is getting safer. But many people still believe that injuries – or even fatalities - are an unavoidable part of what we do. Laing O'Rourke does not accept this view. That's why in 2010 we launched 'Mission Zero'. Mission Zero is our campaign to eliminate all accidents from our operations. We know it's a tough target. Achieving it won't be easy. But, to us, there's no more worthwhile goal than keeping all our people safe and well. To help us get there, we have launched a number of new initiatives, while improving existing ones.

Laing O'Rourke Middle East employs full time safety staff to monitor the safety of the workforce at sites. Our workers attend daily safety activity briefings and weekly toolbox talks with our supervisors and safety staff carrying out daily site inspections.

Our workers are encouraged to report potential hazards and close out their risk and a select number of workers who have identified hazards are rewarded on a monthly basis for exhibiting positive safety behaviour. Onsite training and safety campaigns are conducted; workers are equipped with the required safety information; and equipment and personal protective equipment (PPE) is provided to workers to carry out works safely.

Laing O'Rourke also provides a licensed clinic staffed by a full time doctor and nurses.

Laing O'Rourke currently holds OHSAS18001 certification for our Health & Safety Management systems.

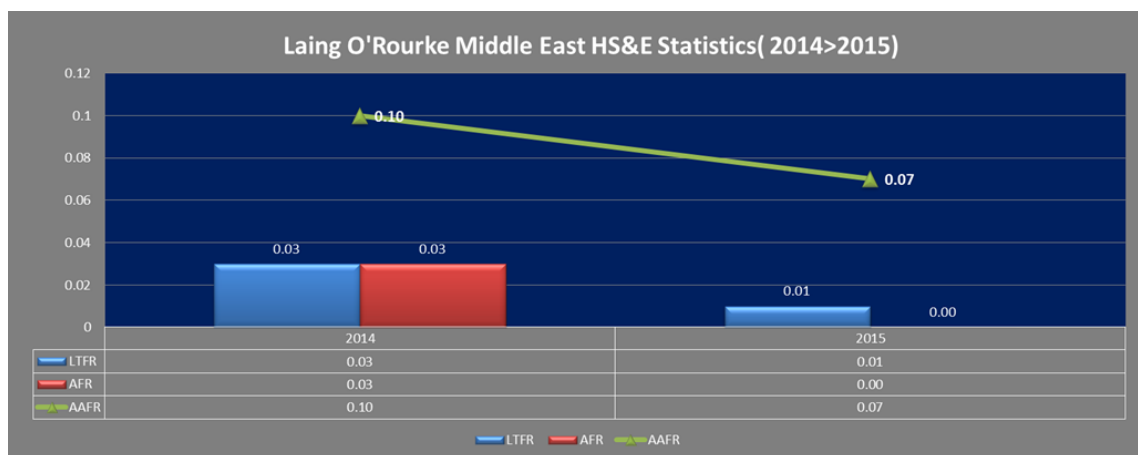
From January 2015 to date Laing O'Rourke Middle East has achieved over 24 million man hours worked without a Lost Time Accident and has recently completed 6 projects without a lost time incident or accident.

- b) Have you established occupational health and safety committees, and if so, do these have worker participation?

Each Laing O'Rourke establishment and project has a monthly safety & welfare committee, which consists of workforce representatives, workforce accommodation management, administration staff, safety staff and establishment or project management staff. There is active participation from our workers and the Company encourages them to raise concerns and safety issues in the workplace and at the workforce accommodation.

- c) How many accidents and fatalities have taken place on site in the last two years?

There have been no fatalities in the past two years within our Middle East business. There have been four accidents.



Year/Month	MAN HOURS	FATALITY	MAJOR	>7 Days	>3 Days	Public	Minor	Dangerous Occurrence	LTFR	AFR	AAFR
2014	9,652,164	0	1	1	0	0	11	0	0.03	0.03	0.10
2015	20,709,885	0	0	1	1	0	12	0	0.01	0.00	0.07

- d) What measures do you have in place to protect workers from high temperatures during the summer months? How do you communicate these measures to the workers?

Each Laing O'Rourke establishment and project has developed a specific summer working plan, setting out the standards expected throughout our facilities during the summer period, (mid June to mid September). The working hours are modified, and no external works are carried out between 12:30pm and 3:00pm. In accordance with Dubai labour laws, working shifts are changed

to ensure the workforce has left site at the end of the shift before 12:30pm. The second shift does not arrive on site before 3:00pm.

Chilled water is supplied to the workforce at designated rest stations, additional rehydration breaks are introduced and the workers are encouraged to take regular breaks in the shade. Heavy manual tasks are managed through job rotation to minimise exposure. Cool rooms and recovery rooms, controlled by the site nurse or first aiders are provided with rehydration supplements, which are made available if required. The heat index is monitored with digital equipment, and if conditions are extreme, works are stopped and the workforce is sent back to their accommodation in air-conditioned transport.

Summer working briefings, presentation and toolbox talks are given to all our employees. These short training and briefing sessions provide information about how best to reduce exposure during the summer; what controls individuals and the business need to take to reduce the risk of dehydration; how to identify those who may be suffering the effects of heat exposure; and the first aid steps that may need to be carried out.

5. Conditions of employment: Please describe your company's policies and practice on each of the items listed below.

Where applicable, please include information on how you monitor and enforce these policies in direct operations and in contracts with business partners.

- a) Contracts - ensuring they are in a language the worker understands and are not modified upon the worker's arrival in the UAE

During the recruitment drive, individual consultations are held between Company representatives and the worker. Terms and conditions of employment are discussed in the native language and the Company representative answers any queries related to employment directly without any interventions from the recruitment agent. The contracts are translated in the national language of the candidate and no changes are made to the terms and conditions.

- b) Full and timely payment of wages, including issuing of bank cards for workers

We pay our workforce on time through The Wage Protection System with monies credited to an individual's salary account with that person able to withdraw their money with a debit card. Laing O'Rourke has always paid its workers on time since it commenced operations in the Middle East.

c) Issuing ID and health cards for workers

All our workers receive their Emirates ID when they join us. In addition to this the Company provides individual identity cards to all workers.

All workers are covered by medical insurance and are provided with medical insurance cards. In addition, our employees can access a doctor and nurse in the Company clinic. All medical treatments both through the Company clinic and through medical insurance are availed with zero cost to the worker. The Company provides transportation to the clinic/hospital or where it is not feasible to provide transportation then the travel cost is reimbursed.

d) Ensuring adequate worker accommodation

Laing O'Rourke currently employs more than 3,000 workers in our Dubai business. All of our workers are expatriates and are housed at our various workforce accommodation facilities in Dubai. Care is taken to ensure that the accommodation is chosen in a location close to our projects/business unit so travel time is minimised.

The Labour Ministry, independent consultants and our clients regularly audit our facilities. The results of these audits confirm that the standards we have set for labour welfare is amongst the best in the region.

Laing O'Rourke provides special locker facilities for every one of our workers housed in the workforce accommodation, providing them with the ability to safeguard their own passports and other personal valuables. Each accommodation facility has its own dining area, serving quality food free of charge to the workforce. Caterers provide hot food three times a day; breakfast and dinner is served at the worker accommodation and a hot lunch is provided on site.

Cooking facilities are also offered, should people wish to cook for themselves. In addition to this, both indoor and outdoor recreational facilities are provided and each accommodation facility has free cyber café facilities and a 24/7 helpdesk.

Air-conditioned transportation is made available to take operatives to and from work. Shuttle services are also provided during the weekend allowing people to enjoy their time off. Regular cultural, sports and intellectual activities are held and enjoyed at the workforce accommodation.

e) Passport retention - ensuring workers can store passports in a safe place and have access

Workers retain possession of their own passports with each person provided with personal digital lockers, located at their living accommodation.

- f) Allowing workers to transfer employers within the country

If an employee wishes to leave Laing O'Rourke then the Company arranges to cancel his visa in accordance with UAE labour law. It is the employee's prerogative to go back to his home country or join another employer in UAE. If a No Objection Certificate is required to facilitate the job change, Laing O'Rourke Middle East provides the same.

- g) Issuing of exit permits for workers who wish to leave the country

This question is not relevant to the UAE. All our workers who wish to leave UAE are provided assistance to exit the country.

6. Recruitment agencies:

- a) What process does your company employ to recruit migrant workers?

Most of our workers are recruited from the Asian subcontinent. We comply with strict guidelines regarding recruitment and members of the Laing O'Rourke management team regularly visit the place of recruitment to ensure that our standards are adhered to. Our recruitment agreement mandates that no money shall be collected from the operative, and Laing O'Rourke staff members interact with all operatives before, during and after the recruitment to ensure that there are no breaches of this policy. Laing O'Rourke pays the recruitment fees directly to the recruitment agency and pays all costs incurred by that agency in sending the operative to UAE

- b) Which recruitment agencies does your company regularly work with to hire workers? *Please list names and contact details of the recruitment agencies.*

Laing O'Rourke follows a rigorous and stringent process while identifying recruitment providers. We are committed to ensuring that the providers we work with follow ethical recruitment practices that align with our expectation of zero fees payable from the workers to the recruiters.

We require anyone acting or working on our behalf to follow and uphold the intent of the standards set out in the Code of Conduct.

- c) Does your company take steps to ensure that the recruiting agencies it deals with do not charge recruiting or placement fees? If workers have been charged fees, does the company compensate them for this expense on arrival in their position?

Laing O'Rourke does not permit our workers to pay any recruitment related fees. Our management team in the Middle East liaise with operatives before, during and after recruitment to monitor compliance with our policy.

Laing O'Rourke Middle East conforms to a "Free Recruitment" concept and covers all recruitment costs incurred by the agency in sending operatives to the UAE including joining ticket, agency fees and pre-recruitment medical costs. Laing O'Rourke Middle East has procedures in place that ensure all recruitment agents maintain transparent procedures and the employee has not entered into any financial obligations with the recruitment agent.

Where concerns have been raised we have carried out thorough investigations and taken steps to ensure workers are reimbursed. Last year, our Chairman Ray O'Rourke spoke about this very issue jointly with Andrew Forrest of the "Walk Free Foundation" and you may be interested to read the article http://www.huffingtonpost.com/andrew-forrest/the-modern-slavery-bill-a_b_7010494.html

- d) Does your company require business partners to comply with the above recruitment procedures?

Laing O'Rourke ensures that the process undertaken for recruitment and mobilisation of workforce is strictly implemented for all Laing O'Rourke businesses, and majority owned subsidiaries operating in UAE.

7. Grievance/remedy:

- a) Does your company have a grievance mechanism that is accessible to workers employed by you or working indirectly for you via business partners, in their own language?

One of the key aspects of employee relations is to connect with our workforce and ensure that there is seamless two-way communication.

At Laing O'Rourke Middle East we encourage regular communication with our workers. At work this is facilitated through site welfare meetings where formal interactions are held between worker representatives, employee welfare representatives and the senior management representative of the specific location. Issues pertaining to worker welfare and common worker grievance are addressed in a timely manner.

We operate an open door policy and workers are free to approach anyone from the site foreman to the project leader for any work related grievance. Office managers and site and accommodation supervisors at the workforce accommodation handle personal grievance issues. Office managers can be contacted after work hours and the accommodation supervisors are available 24/7 at all our accommodation facilities.

If matters are not handled to the worker's satisfaction then they can directly approach the senior administration manager at head office.

If the worker would like to share his grievance anonymously then grievance boxes are provided at all sites where operatives are encouraged to share their

opinions. Head Office administration handle these in complete confidentiality. Operatives can also post any concerns via email.

b) How do you ensure that workers are aware of its existence?

Workers are made aware of the grievance procedure during their induction and multilingual posters informing workers of the procedures are available across sites. The welfare meetings also reinforce the message that the Company takes worker welfare seriously and encourages them to share any issues that affect them at work.

How do you ensure that workers do not face retaliation from supervisors or others for raising grievances?

All investigations are carried out in a discrete manner and the anonymity of the worker is protected at all times. Disciplinary actions will be initiated against the individual if any act of retaliation against one of our workers is proved. We keep in constant touch with anyone who raises a grievance to ensure that they feel protected and supported.

c) What processes do you have in place to address and remedy grievances?

The Company operates a formal grievance process, which encourages all our workers to share any issues they may face. Information of the grievance process is available at all sites in the form of multilingual posters and leaflets. The workers can choose to post a written grievance in any of the grievance boxes available at project/ business unit, workforce accommodation or head office, all of which are monitored weekly.

The grievance can be submitted in any language and if the worker wishes then they can also drop anonymous notes to the grievance box. The administration manager or designee makes every effort to find the factual details related to the grievance. If necessary a meeting is scheduled with the worker, project/ business administrator, supervisor or any witness as deemed appropriate. A thorough investigation is carried out and where the worker identifies himself, the results are communicated to him and the project/ business administration in writing. The grievances are normally resolved within 30 calendar days.

Where the worker is not satisfied with the response then he can escalate his grievance to the company director either through a written complaint or by meeting individually with the director.

The Company will take necessary steps to ensure that no worker is threatened or discriminated for filing a grievance. If the Company determines that retaliatory action has been taken against the worker then disciplinary action will be initiated immediately.

8. Freedom of association:

- a) Does your company have organisational-level policies and procedures in place on freedom of association for workers?

Laing O'Rourke respects the right to freedom of association with others and the right to participate in lawful activities, which do not restrict or in any way unduly influence an individual's duties.

- b) How does your company implement such policies in a context where local law restricts the ability of migrant workers to form or join trade unions, such as in the UAE?

We operate within the framework of the UAE Federal Law. Our workers in each location identify their leader/s who then represent them in all welfare meetings and bring any issues pertaining to the workers to the Company's attention. Our open door policy allows our workers to approach any of the Company authorities both at work and at the workplace accommodation to raise any issues individually or collectively.

9. Public engagement:

- a) Who in your leadership is responsible for ensuring compliance with policies and procedures related to human rights in the UAE?

Laing O'Rourke is committed to achieving corporate governance standards and ethical business practices that meet the highest possible levels of integrity and compliance for a privately owned enterprise. We place strong emphasis on upholding the highest standards of business conduct, ethics and integrity and this approach is encompassed in our Global Code of Conduct. At a Group level, our Group Executive Committee is responsible for compliance with policies and procedures.

The managing director of Laing O'Rourke Middle East is responsible for ensuring compliance to human rights issues in the Middle East operations.

- b) Who should be contacted if workers or civil society groups have questions or concerns about your company's UAE operations? Please provide contact information.

The managing director of Laing O'Rourke Middle East can be contacted for any queries pertaining to UAE operations.

10. Engagement with the Emirati government:

- a) How does the company work with the UAE government to improve enforcement of the labour law in areas such as passport and fee retention?

Through the normal course of our business, we will engage with the UAE Government whenever there is an opportunity to do so.

- b) Has your company engaged with the UAE government about elements of the “kafala” sponsorship system that restrict workers’ ability to change jobs or leave the country?

Laing O’Rourke has not specifically discussed this with the UAE government. As outlined in our answers to questions 5e, 5f and 5g, our workers retain their own passports; transfers to another employer are carried out in accordance with UAE labour law and we provide assistance to any worker who wishes to leave the UAE.

11. **Challenges:** Please describe any challenges your company is encountering in the areas described above.

Laing O’Rourke has been operating in the United Arab Emirates for nearly 4 decades now. Our experience with the UAE Government confirms our belief that they has been very supportive of worker welfare through the years. The UAE Government has increasingly devoted a lot of time and attention to this issue and continues to implement progressive labour welfare initiatives. We are confident that with initiatives like the recently announced Taqdeer awards, UAE will raise the bar for labour practices in the region.