

## John Laing plc – Policy of Ethical Conduct

John Laing plc (“the Company”) operates its business in accordance with a number of general principles which are set out in this Policy of Ethical Conduct. The purpose of these principles is to support the development of a sound and successful business which respects the needs of all stakeholders, including government clients, users of our projects, employees, business partners, shareholders, and other people affected by our activities. The Company is active in a growing number of countries, and it expects the standards set out in this Policy to be applied in all of the projects with which it is involved. In addition, we will endeavour to ensure that our partners and sub-contractors abide by the principles of our Policy of Ethical Conduct. The six general principles are as follows:-

- 1. Legal requirements** – we comply with legal requirements applicable to the countries in which we are active, both in terms of bidding for new business and implementing projects once they have been awarded.
- 2. Business ethics** – we are committed to carrying out our business with high standards of integrity and ethics: avoiding unfair anti-competitive practices, ensuring that Company information is maintained confidentially and securely, and avoiding all forms of corruption and bribery. Employees should declare any outside business interests and any conflicts of interest which may arise. (See also Fraud Policy and Whistleblowers’ Charter).
- 3. Health & Safety** – we are committed to safeguarding the health and safety of our employees, of others who carry out work on our behalf and of those who may be affected by our work. The Company maintains a documented health and safety management system at every level to describe how these issues are dealt with in practice. We regularly monitor the health & safety performance of all our projects, including key subcontractors working on those projects. (See also Health and Safety Policy Statement).
- 4. Employment practices** – we maintain a working environment where all employees are treated with dignity and respect. We are committed to providing equal opportunities for all employees regardless of their race, colour, ethnic origin, religious belief, sex, sexual orientation, marital status, age, nationality, or disability. We are committed to engaging in open communication with our employees. (See also Employee Handbook).
- 5. Environment** – given the long-term nature of many of the Company’s projects, and the need to work closely with government departments, local authorities and local communities, the environment is an important consideration in all of the Company’s activities. We are committed to preventing pollution, to comply with all relevant legal requirements as well as the specific requirements of our Clients and to undertake a positive action programme by setting annual objectives and targets. Furthermore, we seek continual improvement and the promotion of good and sustainable environmental behaviour in our staff, partners and contractors with whom we work.
- 6. Relationship with external parties** – we will listen to and respond to reasonable enquiries raised by external parties who are affected by our activities, and will communicate with them in a timely manner.

The Company will review this Policy of Ethical Conduct on a regular basis and will introduce revisions where necessary.

Adrian Ewer  
Chief Executive, John Laing plc  
November 2007