

The logo for Laing O'Rourke is centered in a dark grey rectangular box. It features the company name "LAING O'ROURKE" in white, uppercase, sans-serif font. Above the text is a horizontal yellow bar, and below the text is a horizontal red bar.

LAING O'ROURKE

2018 Questions for Construction Companies
in the UAE

MIGRANT WORKER RIGHTS

MONDAY, 10 SEPTEMBER 18

Name of company: **Laing O'Rourke Middle East Holdings Limited**

Headquarters address: **Laing O'Rourke plc, Bridge Place, Anchor Boulevard, Admirals Park, Dartford, Kent, UK**

Website: www.laingorourke.com

1)

a) Please describe the scope of your company's operations in the UAE, including reference to the company's current projects and any labour rights standards governing these projects.

Through its operations around the world, across building and infrastructure sectors, Laing O'Rourke's mission will see the business secure its position as the recognised leader for innovation and excellence in the construction industry by 2025. With a heritage that draws on 170 years' experience and a diverse group of vertically integrated businesses, Laing O'Rourke has helped forge cities, communities and economies.

Working across the UK, Australia and South-East Asia as well as in the Middle East, our operations span a range of sectors, including: lifestyle; business; social infrastructure; transport; power; mining and natural resources; oil and gas and utilities and waste. We deliver engineering, innovation, project leadership and certainty for our clients on the world's most complex and challenging buildings and infrastructure.

Laing O'Rourke's Middle East business was established in Dubai in 1977 and is amongst the largest and most highly respected construction solutions providers in the region, having undertaken a significant number of iconic and technically challenging engineering projects. With the support of the Laing O'Rourke Group, Laing O'Rourke Middle East has the breadth of capabilities and depth of expertise to cover the full range of engineering, construction and specialist services.

Our current projects include the construction and delivery of:

- **Al Wasl Plaza at the Expo 2020 project site;**
- **Site wide logistics and support services at the Expo 2020 project site;**
- **M-Extension of the Jebel Ali Power station; and**
- **Khazna Data Centers Pods 4,5 and 6 at Dubai and Abu Dhabi.**

We are currently aligned with the labour rights standards governing these projects.

b) List your company's business relationships on its current projects, including with business partners¹ and entities in its contracting chain.² If your company maintains this information publicly, please provide a link or attachment to it.

¹ i.e. joint venture partners, State and non-State clients, and State and non-State project financiers

² i.e. subcontractors, recruitment agencies, and labour supply companies in countries of origin and destination

Given below is the list of current projects that Laing O'Rourke Middle East is involved in and the names of our clients/business partners.

Sr. No.	Name & Nature of Project	Bidder's Scope of Works in the Project	Total Value AED of the Project	Geography	Current status	Start Date	Completion Date
1	Al Wasl Plaza	Laing O'Rourke are building Expo 2020's Leadership and Media Pavilions, and the event's "Hammerhead" access road to the Al Wasl Plaza, plus landscaping. The company is also responsible for carrying out associated mechanical, electrical and plumbing works. With a diameter of 150m, Al Wasl Plaza will form the centrepiece of Expo 2020's 4.38sqkm site in Dubai South. It will include a massive steel trellis dome.	670m	Dubai, UAE	Ongoing	Jan-18	Mar-20
2	Expo 2020- Site Wide Support Services	Delivery of site wide logistics of construction delivery of EXPO 2020 Work include provision and maintenance of temporary roads, establishment of compounds and provide of a multi-skilled site wide logistics	125m	Dubai, UAE	Ongoing	Jan-17	Oct-20
3	Jebel Ali Power Station M-Extension	Main civil works scope for the Jebel Ali Power Station M-Extension, includes 20nr structures with area of circa 7,000m2 which involves ground works, in-situ concreting, blockwork, underground services, access roads and finishes.	125m	Dubai, UAE	Ongoing	May-16	Jan-19
4	Khazna Data Centers Pods 4,5,6 - Dubai & Abu Dhabi	Laing O'Rourke was appointed by Khazna Data Centers (Khazna) to design, build and fit-out Khazna Data Centers's Pods 4, 5 and 6 in Dubai and Abu Dhabi doubling its data center capacity. The expansion covers an area of around 31,000m ² across the existing facilities in Abu Dhabi and Dubai out of which 7,500m ² is IT whitespace. The scope of the projects includes full design responsibility, construction of a two-storey building for each pod, and all specialist mechanical, electrical and plumbing works. Design work commences with immediate effect with on-site works due to begin in early 2018. The projects are scheduled for handover in summer 2019 in Dubai and autumn 2019 in Abu Dhabi.	760m	Dubai, Abu Dhabi, UAE	Ongoing	Oct-17	Sep-19

A significant proportion of our works on current projects is self-delivered by our Group companies, minimizing reliance on the external supply chain. Where specialists are required, we engage with subcontractors to carry out defined packages of work. The nature of construction delivery means that subcontractors may be present on site for a short, fixed period of time and as such, it is not practical to list the same in this questionnaire. The list of subcontractors working with us at any one moment in time can be shared should a representative of BHRCC visit in person.

2) Does your company maintain public workforce data? If yes, please provide a link or attachment with the data.

If not, please provide the information on the number of:

a) Directly employed³ workers on your current projects, and their countries of origin

Given below are the information of our direct workforce and their country of origin.

Nationals of	Number of workers*
Bangladesh	188
India	2076
Nepal	65
Pakistan	113
Philippines	4
Total	2446

*Data as of 31st July 2018

³ A directly employed worker is a worker with whom you have a contract of employment and to whom you pay wages



b) Workers employed by subcontractors on your current projects

The number of subcontracted workers on our projects varies and is dependent on the nature of work carried out on the projects. The monthly average number of subcontracted workers who were working on Laing O'Rourke projects for the calendar year 2017 was 1032.

c) Workers employed by labour supply companies on your current projects

Laing O'Rourke has a directly employed labour force of nearly 2450 employees (see 2(a) above). This labour force is supplemented during peak times of project delivery, using labour supply companies who provide resource to us under a labour only sub-contract. The number of hired workers and the duration they are on our site varies depending on the scope of work. The monthly average number of hired workers used for calendar year 2017 was 166.

Human rights policy & due diligence

3) Does your company have a publicly-available written policy to respect human rights in its operations that addresses a) the rights of workers employed by the company and b) the rights of workers employed by subcontractors, labour supply companies and other entities in the company's subcontracting chain? Please provide links or attachments to the company's relevant policies.

Laing O'Rourke believes laws and regulations act as our minimum integrity standards. Laing O'Rourke's Global Code of Conduct (the 'Code') (<http://www.laingorourke.com/who-we-are/governance/code-of-conduct.aspx>) articulates our approved set of ethical principles covering key business issues. We expect every employee and contracted supply chain partner to follow and uphold the intent of the standards set out in the Code (refer to the sections on 'Working with Third Parties,' 'Relationship with Suppliers,' 'Relationship with Companies', Human Rights, etc.). By setting the expected minimum standards of business conduct in different areas of our work, the Code is integral to the way we do business at Laing O'Rourke.

Attached is the LORME Worker Welfare Policy (Addendum: A1). Created specifically for the Middle East region, this policy articulates LORME's approach to protecting workers' rights and addresses key welfare areas.

Our website carries a Modern Slavery statement, which although pursuant to UK legislation carries principles held globally.

<http://www.laingorourke.com/responsibility/governance/modern-slavery.aspx>

- 4) Does your company require subcontractors and other entities in your contracting chain in the UAE to comply with your human rights and other rights-related policies and procedures? If yes:
- a) How do you hold them accountable to these requirements (e.g. through contract clauses) and ensure their compliance (e.g. through training, monitoring, penalties etc.)?
 - b) Do you enforce compliance beyond the first-tier of your contracting chain? What challenges does the company face in ensuring subcontractor compliance, both in the first and subsequent tiers?

As a condition of engagement, we expect our supply chain to comply with all applicable national and international regulations. This includes legislation relating to working hours, wages, welfare and human rights.



Anyone acting or working on our behalf, such as agents, partners, affiliates, sub-contractors and suppliers, are required to follow and uphold the intent of the standards set out in our Code. The Code forms part of our subcontract and supplier terms and conditions.

We also conduct third-party screening of suppliers on a sample basis. The performance of our supply chain is monitored and assessed on a quarterly basis to identify any areas for improvement or to acknowledge successes at quarterly review meetings. For our more strategic trades and high-risk purchase and subcontract orders, we take this one step further by going into the supply chain organization to carry out a second party audits.

The Code's 'Speaking Up' policy makes it clear that if anyone (which includes employees and supply-chain partners) is aware of a breach of the Code, or is suspicious that a breach is taking place, it must be reported, and a confidential reporting service is available.

Recruitment

- 5) Please describe your company's process for recruiting migrant workers to be part of your directly employed workforce in the UAE.

We have clearly articulated recruitment policies, procedures and guidelines that mandate the way recruitment is conducted for the Laing O'Rourke Middle East business.

Recruitment of workers, when done from overseas, is channelled through authorized recruitment agents. The selection of the recruitment agency follows a stringent process which includes:


- **shortlisting based on criteria listed in our pre-qualification process;**
- **meeting with the proprietors of the shortlisted agencies;**
- **visiting the agency offices in the country of recruitment to understand their modus operandi, testing their commitment to guard against the use of sub agents, confirming their geographical spread, inspecting their trade test facilities and understanding the calibre of the team assigned for LORME recruitment;**
- **this is followed by meetings with the LORME Directors to finalize the appointment of a recruitment agent.**

LORME has zero tolerance for any form of exploitation (direct or indirect) in the recruitment process and ensures that workers incur zero cost to take up employment with the Company. All costs pertaining to recruitment such as agency fees, visa costs and joining tickets are paid by LORME. The team assembled by the recruitment agent to oversee LORME recruitment is fully briefed on our recruitment policy and is mandated to ensure that all communication issued to potential candidates reflects LORME's zero cost and exploitation free recruitment.

All candidate interviews are conducted by LORME staff. In addition to the Trade Test conducted by LORME technical staff, each candidate is interviewed by a head office colleague who will make sure that they are aware of recruitment guidelines. Candidates are encouraged to report any deviation from the same.

The selected candidates are briefed in their native language about the Company, the country of work, their employment contract and their entitlement under the Labour Law at the time of employment. In order to ensure that the candidate understands the contents of the employment contract, it is translated into the national language of the worker's country for review and acceptance. The candidates are also expected to complete a pre-recruitment questionnaire that confirms their understanding of the LORME recruitment process and collects vital candidate information.

The visas and the tickets for the workers are arranged by LORME head office and once the workers join the Company, they are expected to complete a post recruitment questionnaire to



gauge if there has been any non-conformity in the process and if they have been exposed to any kind of exploitation. A similar questionnaire is given to the workers after they complete six months with the Company to ensure that any issues they were hesitant to raise when they joined LORME can be raised once they have settled in. The recruitment agent will be held responsible for any breach in our recruitment guidelines.

- 6) Does your company have a publicly-available written policy to respect migrant workers' rights that addresses the specific risks migrant workers face during recruitment? Please provide links or attachments to the company's relevant policies.

Please refer to the LORME Worker Welfare Policy (Addendum: A1) LORME Recruitment Policy (Addendum A2)

- a) How does your company prevent the practice of contract substitution? Does your company have a policy of honouring the terms of contract signed in workers' home countries?

As outlined in question 5 above, during the recruitment drive, individual consultations are held between the LORME representative and the candidate where, amongst other things, the terms and conditions of the employment contract are explained in detail to the candidate in their native language, with the individuals encouraged to ask questions so they fully understand the terms and conditions of employment. The LORME employment offer letter is then translated to the national language of the candidate and sent to them for signature, followed by the MOHRE offer letter. These documents are directly sent from the LORME office to the prospective employee or to the recruitment agent as applicable.


- b) If your company has a policy of no-fee recruitment, what steps does it take to ensure workers do not pay recruitment fees and related costs?

We cover all costs incurred by the recruitment agent including agency fees, joining air tickets and pre-recruitment medical costs. We work to ensure that our workers incur zero cost to take up employment with Laing O'Rourke Middle East. Our recruitment process is monitored at every stage to determine that the workers have not entered into any financial obligations in the process of becoming employed. We liaise with the workers before, during and after recruitment to monitor compliance to our recruitment practice. This is done via individual interviews and through pre and post recruitment questionnaires. Workers are encouraged to share concerns if there is any deviation from the policy. If concerns are raised, thorough investigations will be carried out by Laing O'Rourke Middle East, and the recruitment agent will be required to rectify and remedy any breach within a 15 day period.

- c) If your company has a policy of reimbursing fees, please describe the company's process for identifying incidences of worker-paid fees and reimbursing fees to workers.

Our recruitment practices dictate that all expenses incurred by the worker in taking up employment with Laing O'Rourke Middle East will be handled by us through payments made to the recruitment agent so there is no money transactions by the workers. Any incidence of workers paying fees will be noted during our one-to-one interviews with the candidates during the recruitment drive or when they reach UAE. The use of pre and post recruitment questionnaires also aids in detecting any payments. In the event any worker raises a concern, then the proprietor of the recruitment agency is required to fly to the UAE and conduct a detailed interview with the worker, followed by a thorough investigation within a 15 day period to rectify and remedy any breach.

- d) How do these policies apply to the recruitment agents you engage and to labour suppliers and subcontractors who have workers on your projects?



Our recruitment agents, subcontractors and labour suppliers are required to sign the Laing O'Rourke Code before we engage with them. The recruitment agents are further required to sign the LORME Recruitment Agreement which details their responsibility to ensure that LORME guidelines are adhered to and workers are not exploited (directly or indirectly) during the recruitment process. Our subcontractors and labour suppliers are required to comply with the UAE labour laws. If the requirement to recruit long term workers comes directly for a Laing O'Rourke Middle East job, then support will be provided to our subcontractors to follow our recruitment guidelines.

Payment & wages

- 7) What is your company's process for determining the wages of its workers in the UAE, and what external benchmarks does it use to set wage levels? Does your company consider a living wage in setting its wage amounts? Please explain.

Wages are determined by UAE market rates and based on trades. Wages are reviewed periodically, considering market conditions and Company performance as well as on individual factors such as skill grading in internal trades tests, overall performance and adherence to health and safety standards. We ensure that our compensation package is in compliance with all applicable laws and regulations.

In addition to wages, a remuneration package will include:

- **Free fully furnished accommodation**
- **Free meals served three times a day**
- **Free transport to and from the work location. In addition, free transportation is also provided for clinic visits, drop-off to the airport while travelling to home country and for leisure during weekend and public holidays**
- **Free facilities at the workforce accommodation which includes external space for recreation and sports and fully equipped indoor gyms.**
- **Free laundry services**
- **Eligibility for annual return flight ticket to home country if aligned with policy requirement**
- **Periodic social, leisure, cultural and sporting activities**
- **Free health insurance**
- **Free internet/ Wi-Fi access**
- **Paid 30 minutes break**

- 8) Does your company operate on a contractual "pay when paid" basis in relation to:
- a) Subcontractors?
 - b) Employee wages?
 - c) Other creditors? Please specify.

Generally, we do not operate on a contractual "pay when paid" basis. Laing O'Rourke Middle East employees are always paid their wages on time. We regard prompt payment to our supply chain as both an ethical responsibility and a matter of good conduct. This allows suppliers to make the necessary investments in their businesses and pay their employees. We monitor our Creditors weekly and work with them in order to prioritise payment.



- 9) What mechanisms does your company have in place to detect unpaid wages to workers on your projects? Does your company maintain reserves to ensure salary commitments can be met, and has the company ever intervened to pay workers' wages when the direct employer has defaulted or gone into liquidation? Please describe.

Our directly employed workers are paid by Laing O'Rourke and our robust processes ensure this is managed consistently, in a timely manner and in compliance with UAE Labour Laws.

The UAE Government's Wage Protection System which monitors and ensures the timely payment of salaries by all UAE based employers provides assurance regarding subcontractor payments to their employees.

If a subcontractor goes into liquidation whilst being engaged with Laing O'Rourke, we will provide all assistance required to the workers to claim their wages.

Freedom of movement

- 10) How does your company ensure that all workers on its project sites have free and secure access to their passports and identity documents, including workers employed by subcontractors and labour-supply companies?

Laing O'Rourke's Passport Management policy mandates that all workers have possession of their passports. Independent digital lockers are provided to workers to retain and safely store their passports. We provide personal digital locker facilities for every one of our workers housed in the workforce accommodation, giving the ability to safeguard their own passports and other personal valuables.

We require our subcontractors to provide personal secure locker facilities to their workers, allowing for the safe storage of passports. Where subcontractors secure their workers' passports, we require that they have safeguards in place to protect the worker's legal rights to unconditionally request the return of their passport. In the latter instance, the subcontractor is required to demonstrate the safeguards which include:

- **a passport retention policy that clearly demonstrates compliance with UAE Laws and;**
- **a passport return procedure that defines the process to return passports within a maximum of 24 hours from request being received, and within six hours in the event of an emergency.**


- 11) How does your company ensure that all workers on its project sites have valid work permits and other documents required for employment, including workers employed by subcontractors and labour-supply companies? Please include information on who pays for work permits and what steps the company takes when employers on its projects fail to issue or renew workers' permits.

We pay for all documents necessary for Laing O'Rourke Middle East workers to legally commence and continue working in the UAE. Applying for visas, work permits, Emirates ID and their timely renewal is done centrally to ensure that all our workers have the correct documents enabling them to work legally in UAE.

No subcontractor can commence work at a Laing O'Rourke site without all their workers having visas and work permits valid for the duration of their works.

How does your company ensure all workers on its projects are free to change jobs and/or leave the UAE at will?

All our workers work with us as a matter of choice. If anybody wishes to leave the Company either to return to their home country or to join another employer then it is their prerogative. We



arrange to cancel their visa within a timeframe that is mutually agreeable and facilitate their transfer to another employer or return to their home country in accordance with the UAE Labour Law.

Living conditions

- 12) How does your company ensure safe and decent accommodation for all workers on its project sites, including workers employed by subcontractors and labour-supply companies? Please include information on what steps the company takes when employers on its projects fail to house workers in adequate living conditions.

All our workers are expatriates and are housed at our various workforce accommodation facilities in Dubai and Abu Dhabi. Care is taken to ensure that the accommodation is chosen in a location close to our projects/business unit so travel time is minimised.

Each accommodation facility is fully air-conditioned and has its own dining area, TV rooms, both indoor and outdoor recreational facilities, free cyber café facilities and a 24/7 helpdesk.

As outlined in previous questions, Laing O'Rourke provides special locker facilities for all those housed in the workforce accommodation, providing the ability for individuals to safeguard passports and other personal valuables. To ensure that our workforce accommodation continues to maintain very high standards of cleanliness and hygiene, free cleaning and housekeeping services are provided throughout, including communal areas and in workers' rooms. Free Laundry facilities are also provided with items collected from the workers' rooms and returned fully washed and ironed to their doorstep.

All our accommodation follows stringent health and safety protocols with trained safety supervisors, first aiders and fire marshals residing in each facility. There are regular safety inspections to ensure that our high safety standards are maintained.

All our accommodation facilities have free Wi-Fi connections to enable our workers to use internet facilities. Each workforce accommodation has ample open space which workers can use to exercise, or for recreation. Indoor game/gym facilities are also provided.

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.

If audits of our long term sub-contractors reveal that their workforce accommodation is not up to the standards we expect, then recommendations are made to them to improve the living standards. Where required, appropriate actions are taken to ensure that the recommended changes are implemented.

- 13) Please describe how your company makes provision for workers to have access to:

- a) safe and adequate nutrition

We provide nutritious, high quality food free of charge to the workers. Caterers provide breakfast and dinner at the worker accommodation and a hot lunch is provided on site. Cooking facilities are also offered in Dubai, should workers wish to cook for themselves on special occasions or weekends.

Catering is managed by an independent HACCP certified catering contractor who is regularly monitored by us to ensure the facilities and quality of the food is maintained. The menu prepared by the caterers has a variety of nutritious food to cater for individual dietary requirements and cultural/religious food requirements are also covered.



b) healthcare

We operate our own fully equipped medical clinic with a full time doctor, nurses and an ambulance driver. The workers can visit the clinic for treatment and the Company arranges for transportation. All our workers are provided with medical insurance cards with zero co-payment charges enabling them to visit other clinics after work hours or during holidays. The Company arranges for their transportation from the workforce accommodation and if no vehicle is available then the cost of travelling to and from the external clinic is reimbursed.

c) banking and remittance services

Worker's salaries are paid through the Wage Protection System and disbursed electronically. All the workers are provided with a salary account and debit card to withdraw their money or for use for cash transactions.

d) transportation

Air-conditioned transportation is made available to take workers to and from work. Shuttle services are also provided during the weekend allowing workers to enjoy their time off.

e) leisure activities

All LORME accommodation facilities are provided with free Wi-Fi and adequate leisure facilities which include TV room, indoor recreational facilities, gym/sports facilities, cyber café etc. We regularly organize specials days that cater to sports competitions, intellectual activities, arts and crafts competitions, social and cultural evenings to ensure all our workers are engaged in activities that suit their interests.

Health and safety

- 14) Please describe your company's health & safety policy and procedures, including what steps the company takes to ensure that they are applied to directly employed and subcontracted workers on your projects.

Safety is central to the way we do business and remains our number-one priority. This duty of care surpasses all other imperatives as a matter of moral responsibility. Health and safety is the key focus for Laing O'Rourke and mitigation occurs throughout every level of the Group's governance framework. Our Next Gear global safety campaign is an integrated programme designed to eradicate serious accidents from our business and minimise harm by driving continuous improvement through our culture and leadership. Every workplace is subject to regular reviews of health, safety and environmental risk with action taken to monitor those risks and identify both excellence and the opportunity for change to be implemented where necessary. We place the health, safety and wellbeing of our workers, both direct and sub-contractors, at the heart of the business and this is demonstrated through leadership and commitment to ensure we provide a safe and healthy working environment.

The objective of our approach to Next Gear Safety philosophy is to engage the workforce more so that we better understand the way they work so that we can create a safer environment for them to work in. In order to achieve this, we have redeveloped our Safety Management System (which is OSHA 18001 compliant) to be leaner and more flexible to cater for the ever changing market and working environment which we operate in.

Laing O'Rourke Middle East employs full time safety managers and staff to monitor the safety of the workforce (both direct and sub-contractors) at sites. All workers attend daily safety activity briefings and weekly toolbox talks with our supervisors; and our safety staff members carry out daily site inspections to ensure our policies and procedures are being followed. All workers are



encouraged to report potential hazards and close out their risk and a select number of workers who have identified hazards are rewarded monthly 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.

All sub-contractors are given a copy of the Laing O' Rourke Safety Plan which details all policies and procedures and they are audited before attending site. All workers are required to choose representatives to attend the weekly HSE meetings and the monthly worker welfare meetings to ensure any concerns they may have are heard and addressed.

We have a robust auditing and inspection schedule with audits carried out by senior management, safety and construction staff to ensure all policies and procedures are being followed and implemented by everyone on the project. The workforce are engaged to develop the Method Statements and Risks Assessments and are held accountable during the planned vs actual inspections to ensure work has been properly planned and risks are adequately controlled.

15) What is your company's policy and procedures on overtime? Please include in your answer:

- What the maximum/limit is on the amount of overtime
- Whether overtime work is voluntary
- What the premium is for overtime work
- How the company prevents all workers on its projects from exceeding overtime limits during peaks in construction activity

Working hours are strictly monitored at site and working schedules are planned in advance to prepare for peak work times and to manage any exigency. Overtime work is voluntary and hours and payment aligned with the UAE Labour Laws.

16) What steps does the company take to protect all workers on its projects from high temperatures, humidity and sunlight throughout the year? Please include information on how you monitor heat risk and how you communicate protective measures to all 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 UAE 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 minimize 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 workers return to their accommodation in air-conditioned transport. Summer working briefings, presentation and toolbox talks are given to all workers. 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.

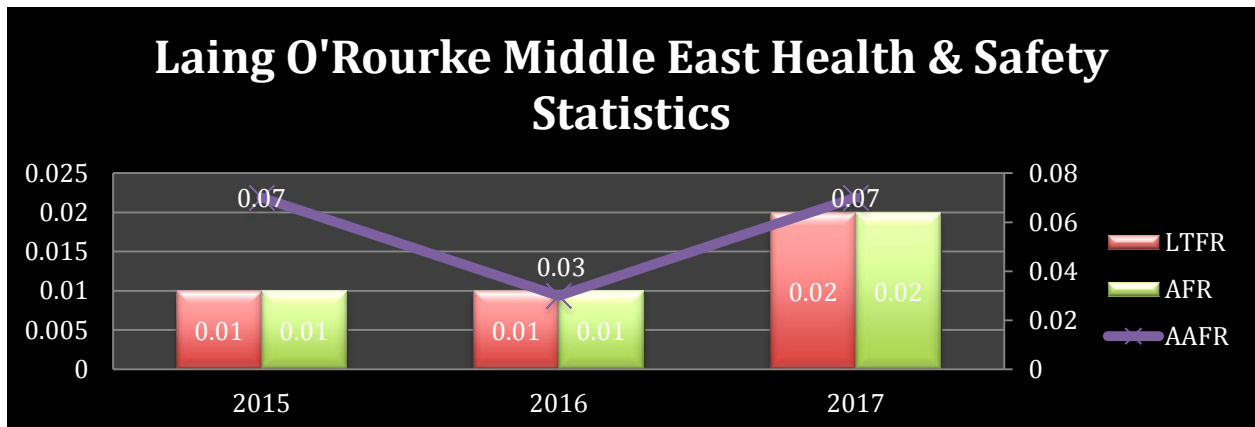


17) Does your company maintain public data on fatalities and injuries to workers on its projects? If yes, please provide a link or attachment with the data. If not, please provide information for 2016 and 2017 on the total number and the causes of:

- a) Work-place fatalities in your direct and subcontracted workforce
- b) Permanent disabilities in your direct and subcontracted workforce
- c) Lost-time injuries in your direct and subcontracted workforce ⁴

There have been no fatalities at a LORME site. Given below are the key safety statistics including LTI that have incurred between 2015 and 2017.

Laing O'Rourke Middle East Health & Safety Statistics													
Year / Month	MAN HOURS	FATALITY	MAJOR (RIDDOR Notifiable Incident)	LTI >7 Days	LTI 4>7 Days	LTI 1>3 Days	Total Major Reportable Incidents	Public	Minor	Dangerous Occurrence	LTFR	AFR	AAFR
2015	20,712,395	0	0	1	0	1	1	0	12	12	0.01	0.01	0.07
2016	23,784,936	0	1	1	0	1	2	0	4	7	0.01	0.01	0.03
2017	12,742,983	0	2	3	0	1	0	0	6	13	0.02	0.02	0.07



Representation and remedy

18) Given legal restrictions on freedom of association and membership of trade unions in the UAE, how does your company ensure workers' voices are represented and heard by the company, e.g. through worker-representative committees? Please describe the mechanism in place.

We facilitate regular communication and encourage workers to share their views. At work, this is facilitated through site welfare meetings where formal interactions are held between worker and employee representatives, and the senior management representative of the specific location. We also encourage our subcontractor representatives to participate in these meetings. Issues pertaining to worker welfare and common worker grievance are addressed in a timely manner through this channel. In addition, worker representatives from across sites are mandated to attend a central worker welfare meeting, which is arranged

⁴ Lost time-injuries calculated on the basis of injuries resulting in incapacity for work of at least three consecutive days (excluding the day of the accident)



once in two months, where they are encouraged to share issues/feedback on worker welfare with senior leaders in the business. Actions taken because of these meetings are then relayed back to the workforce through Toolbox Talks and displayed on notice boards

- 19) In accordance with the UN Guiding Principle on Business and Human Rights, does your company have an operational level grievance mechanism in place for direct and subcontracted workers on your projects to raise concerns, in their own language, and in a way that ensures grievances can be reported safely, without intimidation or retaliation? Please provide a description of the company's grievance mechanism.

There are several ways in which LORME deals with grievances raised by our workers. Our Grievance Policy outlines how workers can raise concerns, highlighting the procedure that is followed once a grievance has been raised and the timeframe for remedial measures. A right to appeal is also articulated in the Policy.

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 workers to share any issues that affect them at work.

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, or to contact head office direct. Office Managers and Site and Accommodation Supervisors at the workforce accommodation handle personal grievance issues and can also be contacted after work hours for confidential issues.

If matters are not handled to the worker's satisfaction then they can directly approach the Senior Administration Manager at the LORME head office.

If the worker would like to share a grievance anonymously, then boxes are provided at all sites where workers are encouraged to share issues in their native language.

Employees who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Employees found to have retaliated against or victimised someone in this way will be subject to disciplinary action.

Workers can also post any concerns via email to a dedicated email address. Illegal activities, wrongdoings or malpractice can be reported under the confidential "Speaking Up" policy contained within the Global Code of Conduct.

- 20) How many grievances were raised in 2017 by directly employed and/or subcontracted workers on your projects? Please provide a summary of the grievances and the remedial actions that were taken by the company and its subcontractors.

We take a proactive approach to worker welfare. Our grievance policy, open door policy, ease of contacting senior staff members, monthly welfare meetings (involving subcontractors) and continuous interactions with our workers ensure that we can deal with any grievance issues promptly. We have not received any grievance through the Grievance process in 2017.

Other information

- 21) Is there anything else that you would like to tell us about how your company takes a responsible approach to managing its operations in the UAE, including any challenges it faces in doing so?