

# John Laing Group plc

## Whistleblowing Policy

Our Whistleblowing Policy (the “Policy”) is there to help you speak up. We understand that, from time to time, difficult situations may occur where you may be asked to do something which feels wrong or be involved in an instance of wrongdoing illegal. Equally, you may be treated unfairly. This Policy gives you the guidance to help you understand the context behind these situations so you can do the right thing.

### 1. Principles

John Laing Group plc (the “Company”) is committed to conducting its business with honesty and integrity and expects all individuals who work for the Company to maintain high standards in accordance with the Company’s policies and procedures.

To help achieve these standards, the Company encourages all individuals to raise any concerns that they may have about the conduct of others in the business or the way in which the business is run. Anybody who is covered by the Policy and who suspects or becomes aware that the Company, its clients, suppliers, employees or directors, or any of the projects in which we invest are involved in an instance of wrongdoing should report their suspicion in accordance with this Policy.

The Company is committed to ensuring that anyone raising a concern in good faith does not suffer victimisation, detriment or disadvantage. The Company fully endorses and will with comply with any local legislation that reinforces that position. However, a concern that is raised maliciously or for no good reason may lead to disciplinary action.

This Policy does not provide the answer to every question you may have or every situation you may be faced with; instead it provides a guidance to follow when faced with an ethical dilemma.

### 2. Policy

#### ***Who Does This Policy Apply To?***

This Policy applies to everyone who carries out work for the Company, including employees (temporary or permanent), contractors, consultants and interns.

#### ***What Is Wrongdoing?***

The Policy applies to the disclosure of a concern which, in the individual’s honest reasonable belief, suggests that wrongdoing has been committed, is being committed, or is likely to be committed. Wrongdoing includes, but is not limited to:

- Financial malpractice or impropriety or fraud;

- Failure to comply with a legal obligation or statute;
- Dangers to health and safety or the environment;
- Criminal activity;
- Improper conduct or unethical behaviour;
- Incidents of bullying or harassment; or
- Attempts to conceal any of these.

### ***What Should I Do If I Have A Concern?***

We believe that the correct approach is to raise concerns in the first instance with your line manager, the Executive Committee member for your business area or the Group HR Director so that an appropriate investigation can be carried out.

However, if you have a strong reason for believing that you cannot raise the matter with management, or where you believe the response is insufficient, you should contact the Group Company Secretary directly or make use of the Group's whistleblowing hotline.

Suspicious of acts of money laundering should be reported to the Group's Money Laundering Reporting Officer ("MLRO"), Clare Underwood. If any suspicions of acts of money laundering are reported to Safecall, they will immediately notify the Group's MLRO.

### ***What is the whistleblowing hotline?***

This is an independent service provided by Safecall. Their expertise will ensure the speed and confidentiality of anything you report.

### ***How do I contact the hotline?***

Safecall provide local freephone numbers for most countries where we operate. These are provided in the table at the end of the Policy. The hotline is available 24 hours a day, 7 days a week, 365 days of the year.

You can also report concerns via the Safecall website: [www.safecall.co.uk/report](http://www.safecall.co.uk/report).

Translation services are available where English is not your first language.

### ***What happens when I call?***

You will talk to one of Safecall's operators who will listen to and take written notes of your concern. The call will not be recorded. Safecall will then securely send a report to the Group Company Secretary or the Group Finance Director who will ensure that your concern is investigated appropriately.

### ***Do I have to identify myself?***

The Company would rather that you did, since this makes investigating the concern and giving feedback easier. However, you may choose to raise a concern anonymously, providing this is allowed by the laws of the country where you work.

***Will my call be treated confidentially?***

The Company will maintain the confidentiality of the report as far as is possible but you must be aware that, to carry out a proper investigation, some information may need to be disclosed.

***Will I be penalised for raising a concern?***

If you raise a concern in good faith you will not be penalised, even if it turns out to be incorrect. However, raising a concern without good reason or maliciously may lead to disciplinary action.

***How do I get feedback on my concern?***

Any report taken by Safecall will be sent to the Group Company Secretary within 24hrs. If you provide your contact details the Company can keep you informed of any future action (unless to do so would compromise any investigation). If you choose to remain anonymous Safecall will agree a time and date for you to re-contact them for any feedback on your report that the Company has provided to them.

***Can I share my concerns with third parties?***

You should not discuss details of their concerns with any third party unless they are exercising their legal rights to report to The Financial Conduct Authority, HMRC, The London Stock Exchange, the police or media under circumstances where you are protected by the Public Interest Disclosure Act, 1998. This does not prevent you from discussing the matter with your solicitor

## John Laing Group plc

### Whistleblowing Policy – Contact Details

#### Group Company Secretary

Tel: +44 (0)20 7901 3200

Email: [clare.underwood@laing.com](mailto:clare.underwood@laing.com)

[www.laing.com](http://www.laing.com)

#### Safecall

Country	Freephone Number
UK	0800 915 1571
Australia	00 11 800 7233 2255
New Zealand	00 800 7233 2255
Canada	1 877 599 8073
The Netherlands	00 800 7233 2255
Germany	00 800 7233 2255
US	1 866 901 3295
Spain	00 800 72 33 22 55
France	00 800 72 33 22 55
Colombia	01800 944 8040

Calls from mobiles are not free and charges will vary depending on your provider.

Safecall website (background): [www.safecall.co.uk](http://www.safecall.co.uk)

Safecall (online report): [www.safecall.co.uk/report](http://www.safecall.co.uk/report)