

Modern Slavery Statement

Modern Slavery and Human Trafficking Statement for the financial year ended 31 December 2022

This statement is made by John Laing Group Limited (“**John Laing**”) pursuant to Section 54 of the Modern Slavery Act 2015 and applies to all of John Laing’s subsidiaries whether incorporated within or outside the UK. It has been approved by the John Laing Board of Directors.

It continues to be our priority to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain.

We report each year on a number of matters such as policy, training, and due diligence processes taken to combat slavery and trafficking, to drive transparency and promote ethical principles and practices related to the prevention of the exploitation and abuse associated with modern slavery and human trafficking.

Our Business

John Laing is a leading international investor and active manager of core infrastructure assets. We invest across the spectrum of development, in construction, and already operational assets, and across a range of sectors, including transportation, energy and utilities, telecommunications and social infrastructure.

John Laing has successfully delivered more than 150 infrastructure assets across the UK & Europe, North America, Australia, New Zealand and Colombia.

We are also signatories to the UN Principles for Responsible Investment (PRI).

Risk Management

Work on modern slavery is a part of our ongoing risk management approach to support human rights. The risk of modern slavery within our direct business operations is considered to be low, however John Laing recognises that it can be indirectly exposed to these risks, for example through its supply chain or project relationships.

Modern Slavery and Human Trafficking

The terms “modern slavery” and “human trafficking” have been used as umbrella terms for the acts of recruiting, harbouring, transporting, providing, or obtaining a person for compelled labour or commercial sex acts through the use of force, fraud, or coercion. “Forced or compulsory labour” is defined in Article 2, International Labour Organisation Forced Labour Convention 1930, and “trafficking in persons” is defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime (the Palermo Protocol).

Our Policy

John Laing recognises that modern slavery is a crime and contrary to fundamental human rights; it is both the business imperative and the moral obligation to carry out its activities in a socially responsible and environmentally sustainable manner, with due consideration given to these human rights. Building on our long history of social awareness and community involvement, John Laing’s aim is to contribute to a sustainable future through our employees, investments, services and business conduct.

Governance

The Board of John Laing is responsible for matters of corporate responsibility, including the issues of modern slavery and human trafficking. We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

We also have a governance framework which includes a number of executive committees which are responsible for maintaining the project controls compliance framework to ensure that existing assets and potential new investments and associated partners are screened and subject to appropriate due diligence in relation to their approach to labour and working conditions.

Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We also have a Whistleblowing Policy, and a structured mechanism for individuals to report any wrongdoing, or unethical behaviour, which includes an independent whistleblowing hotline. The Board is made aware of any allegations raised under the Whistleblowing Policy.

Supply Chain

The John Laing Group, including the projects and businesses in which we invest, has a large number of suppliers across the jurisdictions in which we operate. As an investor and asset manager, we believe the risk of modern slavery or human trafficking in our supply chains and procurement processes to be low. Helping to ensure we are not indirectly exposed, all new suppliers to John Laing Group, are asked to confirm that their organisation will comply (and take all possible steps to ensure that all their suppliers and subcontractors also comply) with all applicable laws, statutes and regulations related to “forced or compulsory labour”, and that they will not engage (and will take all possible steps to ensure that their suppliers and subcontractors will not engage) in any activity, practice or conduct that would constitute modern slavery. Similar requests are made of the parties involved when we invest in or bid for new projects. In addition to this confirmation, the John Laing Group carries out desktop due diligence and where appropriate, enhanced due diligence, on its suppliers and transaction counterparties, which include searches for adverse news, criminal and high-risk activities.

Investment Portfolio

John Laing is committed to transparency and promoting ethical principles and practices related to the prevention of the exploitation and abuse associated with modern slavery and human trafficking.

Monitoring and Review

We will continue to monitor our supply chain and investment portfolio in relation to slavery and human trafficking via our control mechanisms.

Training

We provide training to all our staff, including those members of staff who manage supplier relationships or manage any businesses where we consider there to be a risk of slavery.

The John Laing Board of Directors is committed to implementing and enforcing systems and controls to safeguard against modern slavery, human trafficking and harmful working practices.

James Abbott

Chief Operations Officer and General Counsel