

## BAM UK & Ireland

# Preventing Bribery, Corruption and Fraud Policy Statement

BAM UK & Ireland is an operating division of Royal BAM Group n.v. and consists of three business segments: BAM Construction, BAM Infrastructure and BAM Ireland.

This policy is applicable to all BAM UK & Ireland activities. BAM expects all employees (direct or indirect, contract or temporary) and suppliers to comply with the UK Bribery Act 2010, Economic Crime and Corporate Transparency Act 2023 and other applicable regulation.

BAM's key principles to prevent bribery, corruption and fraud are:

- BAM does not tolerate bribery, corruption and fraud in line with law, regulation and the BAM Code of Conduct.
- Business must be conducted honestly, without engaging in bribery, corruption or fraud.
- Employees of BAM (direct or indirect, contract or temporary) must not give or receive anything of value for the purpose of encouraging improper business performance or gaining any improper business advantage. Neither do employees use deceit or trickery to gain a financial or personal advantage. Facilitation payments are prohibited.
- Bribery, corruption and fraud are prohibited with respect to any person. Engaging in bribery, corruption or fraud, even indirectly or through third parties, may lead to dismissal, end of a business relationship, and, in addition to substantial fines and even imprisonment.
- BAM takes appropriate steps to prevent third parties, who provide services on BAM's behalf, to engage in bribery, corruption and fraud.
- Sponsorships or charitable donations must be transparent and recorded accurately and honestly.
- BAM does not give donations to political party campaigns, groups, individuals or entities.
- Gifts and hospitality (offered or accepted) must be for business purpose, reasonable, proportionate and appropriate in the circumstances. Gifts or hospitality over £100 or €100 must be approved in advance by line management and accurately recorded.
- All BAM's books and accounts must be accurate and reasonably detailed to reflect all obligations and transactions and must not include false, artificial or misleading content.

This policy is achieved by effective operation of our integrated management systems together with the active leadership, participation, professionalism and

commitment of all personnel. The management systems aim to meet the requirements of the division, our clients and other interested parties.

The Divisional Leadership Team is responsible for the implementation of this policy statement to be fundamental to BAM UK & Ireland Division meeting its standards and commitments.

Executive Directors are responsible for ensuring the implementation of this policy within their area of control.

Our approach provides the framework to set and monitor objectives with key focus on:

### Management System

- deliver a clear framework for managing bribery, corruption and fraud risks to ensure appropriate controls and to monitor effectiveness.

### Due diligence

- follow due diligence and risk assessment procedures before engaging with third parties.

### Training and education

- increase awareness, knowledge and skills of our people to prevent bribery, corruption and fraud and to be able to recognise potential risks by mandatory training modules and workshops.

### Speak Up

- employees have a duty to speak up or report concerns of any incident of actual or suspected bribery, corruption or fraud. Reports are made in confidence, can be made anonymously and reporting will be handled with appropriate care.

The COO for UK & Ireland has appointed a Compliance Officer to ensure awareness of this policy is promoted throughout the Division, the effectiveness is monitored and areas for continual improvement identified and implemented.

*This policy statement has been approved electronically. Proof of approval can be seen upon request*

**John Wilkinson**  
Chief Operating Officer  
BAM UK and Ireland

