

This policy is designed to ensure we comply with economic and trade sanctions laws and regulations of the United Nations (UN), European Union (EU), United States of America (US), as well as all applicable sanctions laws and regulations (including import and export control regulations), as they are applicable in the jurisdictions in which we operate.

This policy sets out the minimum standards with which the Balfour Beatty Group must comply with to meet the above obligations.

We will achieve this by:

- a. monitoring economic and trade sanctions and regulations;
- b. performing a regular assessment of the risk of Balfour Beatty being exposed to persons or regimes subject to economic and trade sanctions;
- c. screening customers and external business partners against global sanctions lists;
- d. prohibiting or restricting business activities or transactions or commencing business relationships that we believe may violate the applicable sanction laws; or involve individuals or entities listed on an official sanctions list; and
- e. blocking or rejecting business activities or transactions where we are obligated to do so under the applicable sanctions laws and regulations.

On a risk-based approach, we will screen customers and external business partners against applicable sanctions lists (including but not limited to UN, EU and US sanction lists). Given the volume of transactions and the fact that the scope of sanctions is highly sophisticated and constantly changing, the screening process will be carried out with the assistance of the compliance solutions offered by reputable third-party service

provider(s) which provide updated databases containing global sanctions lists and other risk data and filtering services. Screening will be performed as part of the third-party onboarding and/or at such other time or other circumstances as are deemed appropriate according to this policy from time to time.

All Balfour Beatty employees shall comply with this policy and its associated arrangements as a part of their roles and responsibilities.

We will not tolerate any breach of this policy that could jeopardize the reputation and integrity of the Group. Any suspicions of policy breach should be reported to a member of the Legal team, and if applicable, the Group General Counsel. Where necessary, we will also report breaches of sanction laws to relevant regulatory authorities.

Any employee who violates this policy may be subject to appropriate disciplinary action, up to and including termination from employment, and may be subject to personal civil or criminal penalty.

We will bring this policy to the attention of our employees, supply chain partners and relevant interested parties; and review it on an annual basis.

## AUTHORISATION

**Tracey Wood**

**Group General Counsel & Company  
Secretary, August 2023**