

Balfour Beatty does not tolerate bribery or fraud in any form. We are committed to protecting our clients (and other stakeholders, including taxpayers) from the impact it can have.

We want to create an environment where:

- everybody understands the damage that bribery and fraud can cause;
- nobody feels pressure to engage in bribery or fraud, a principal by which we firmly stand even if there is a risk of negative consequences for our business (e.g. we lose a tender or a project is delayed);
- employees understand that the risks of bribery and fraud increase when working with public officials and certain types of suppliers or customers (particularly those that are wholly or partly owned by public entities);
- bribery and fraud are not considered a “normal” part of working in the construction industry; and
- everyone working for us takes personal accountability for upholding our zero-tolerance approach and feels empowered to speak up if they have any concerns.

The consequences of bribery and fraud may include: criminal prosecutions (for companies and individuals); significant reputational damage; loss of business and restrictions/bans on bidding for new business; and damage to relationships with customers, supply chain partners and employees.

Our approach to this topic is detailed in our Code of Ethics, supported by more detailed procedures on topics such as conflicts of interest and gifts and hospitality, supplier standards, group compliance systems and training.

The Board of Balfour Beatty is responsible for oversight of the anti-bribery and anti-

fraud programme and for reviewing compliance with requirements.

We have established a Fraud Working Group to oversee fraud investigations and ongoing developments of our anti-fraud programme.

Each Strategic Business Unit is responsible for:

- showing robust leadership and proactively challenging any attempts to rationalise bribery and fraud; and
- ensuring sufficient resources (including additional policies, procedures or guidance of relevance) are in place to support the implementation of this policy, working in conjunction with relevant Enabling Functions, such as Legal, Internal Audit, Ethics & Compliance, Finance & Risk.

All employees are required to recognise their personal responsibility for preventing bribery and fraud. It is the responsibility of every employee to speak up and report concerns if they are:

- asked for, or offered, a bribe or subject to extortion; or
- asked to engage in a fraud; or
- aware of potential fraud or bribery.

Failure to comply with this policy may result in disciplinary and legal action being taken wherever appropriate.

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**

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