

SCOPE

This Policy applies to all Balfour Beatty people in the UK, including employees, apprentices, graduates, workers, contractors, consultants, volunteers and colleagues on work experience. Our Speak Up Helpline is also available to our business partners, and we encourage anyone with concerns to Speak Up.

This policy is non-contractual and may change from time to time.

PURPOSE

Balfour Beatty will fulfil our responsibilities to our shareholders, customers, employees, business partners and the wider community by conducting all aspects of our business at the highest level of excellence and professionalism, and by operating in an ethical manner. In order to meet these standards, we rely on all our people and those who work with us, irrespective of their role within, or for, the organisation, to point out ways in which we can improve the conduct of our business and make our decisions within a clear ethical framework.

The values and behaviours set out in our Cultural Framework, together with our Code of Ethics, set out the principles for everyday decision-making and conducting business with integrity. This policy provides information to help you to Speak Up where you believe that we have failed to observe the behaviours and standards we set ourselves.

ABBREVIATIONS / DEFINITIONS

HR	Human Resources
----	-----------------

INPUTS

Reference	Type	Title
HRS-PL-0006	Policy	Grievance Policy
HRS-RM-0023a	Reference Material	Speak Up Case Management Severity Guidance

OUTPUTS

Reference No.	Document Title	Responsibility	Retention Period
None	N/A	N/A	N/A

PROCEDURAL REQUIREMENTS

1. OUR PRINCIPLE

We encourage a culture of openness, and we all play a role in Speaking Up when we see or hear something in our workplace that we think is inappropriate, unethical, illegal, or immoral. You can speak up, confident in the knowledge that your concerns will be investigated and addressed, and you will be protected by us in doing the right thing.

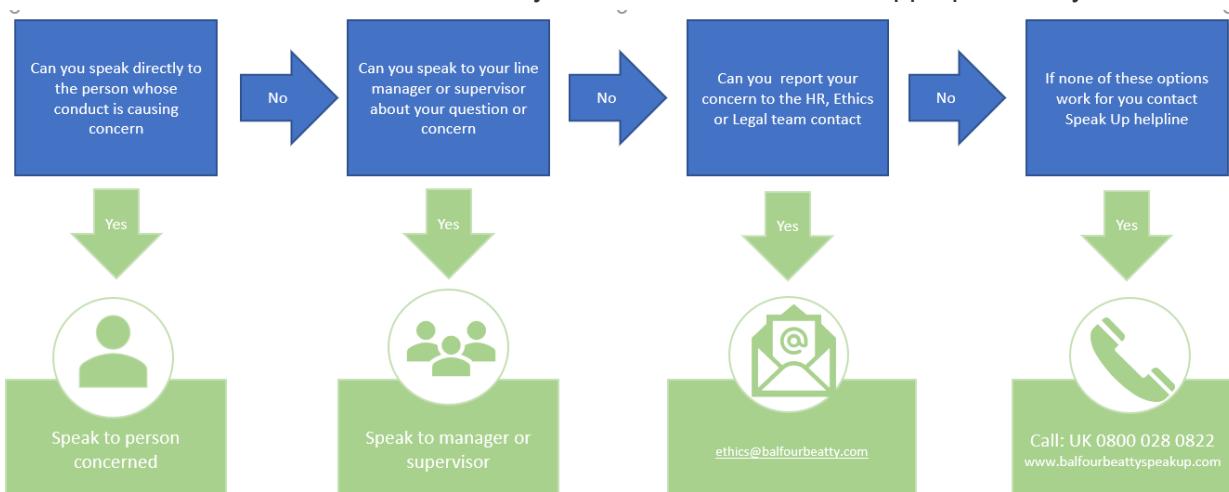
2. SPEAK UP WHEN YOU NEED TO

If you have concerns relating to potential improper or unethical behaviour or business conduct, never be afraid to ask for help.

If your concern relates to your own employment or personal circumstances at work (for example bullying/harassment), you should speak to HR in the first instance or refer to the Grievance Policy. Health and Safety concerns should be raised with your local safety representative in the first instance.

Any concerns about a member of the Ethics team should be reported to the Group General Counsel. If any person believes the problem is of an extremely serious nature (and is reluctant to raise the matter with the teams named above), they can report their concerns to the Group HR Director.

In other cases, use this flowchart to raise your concerns in the most appropriate way.



3. CONFIDENTIALITY

We hope that everyone feels able to voice their concerns openly under this policy. All concerns raised will be treated confidentially and you can report matters anonymously if you wish. However, we encourage individuals to put their name to an allegation whenever possible. If this is not done, it is much harder to protect your position or to give feedback on the outcome of investigations. Concerns expressed anonymously may also be more difficult to investigate.

4. SPEAK UP HELPLINE

If it's not possible to raise your concerns with the person concerned, your supervisor or with the HR, Ethics or Legal team, we have an external Speak Up helpline to allow all our people and third parties (including those in our supply chain and members of the public) to raise and resolve any ethical or business conduct issues as quickly as possible. The Speak Up helpline is an external service administered by an independent company, so impartiality and confidentiality are assured.

Once a concern has been raised through the Speak Up Helpline, where appropriate, an independent investigator will be assigned to the matter. The investigator's name and contact details will be provided to you and updates will be provided through the course of the investigation, whenever appropriate. All reports will be treated in confidence, and we will respect anonymity, where you ask for this, to the extent permitted by law.

The investigator will follow all reasonable lines of enquiry, which may include obtaining copies of relevant records and documents, retrieving and reviewing emails and interviewing persons who may be involved in or who may have evidence in relation to the concern raised. When deciding whether to obtain documents or emails or interview individuals, the investigator will consider the rights of all those involved (including the person who reported the concern) and only undertake action which is necessary and proportionate to the matter being investigated.

If you raise an issue through the Speak Up helpline, you'll be notified when the investigation is complete. Due to the confidential nature of the investigation and any outcome, it is unlikely that details of any action taken will be provided to you.

We reserve the right to make audio recordings of investigation meetings for the purpose of ensuring that any written notes of the meeting are accurate and reflective of the matters discussed. When an audio recording is made, the individual will be notified before the recording begins and, upon request, will be provided with either a copy of the audio recording or a written transcript of the recording.

5. ZERO TOLERANCE OF RETALIATION – OUR GUARANTEE

We are committed to the principle of Speaking Up. If you use this policy to raise a concern in good faith, we will not tolerate any retaliation or discrimination of any kind against you. We also do not tolerate retaliation or discrimination against any person who participates in any Speak Up investigation.

Any concerns about potential retaliation or discrimination should be immediately reported to the HR, Ethics or Legal team, or via the Speak Up helpline (please see below for details). In cases where retaliation or discrimination is suspected, an investigation will be conducted where appropriate. Instances of retaliation or discrimination will be treated as a disciplinary matter and appropriate action taken.

6. WHAT SHOULD I SPEAK UP ABOUT?

You're encouraged to Speak Up when you see or hear possible unethical, illegal, or immoral behaviour. You do not have to be right about every detail you report, but you have to believe that the information you are reporting is accurate. It's impossible to include guidance to cover every possible situation, so we rely on each other to apply common sense and use good judgement. If you are ever in any doubt about how to do the right thing, you should ask for help, following the flowchart above.

You should Speak Up if you see or hear examples of, or the deliberate concealment of, any of the following:

- criminal activity including but not limited to:
 - fraud, deception, and dishonesty;
 - false claims;
 - bribery and corruption including but not limited to:
 - relationships with agents and other third parties;

- facilitation payments;
- gifts and hospitality;
- conflicts of interest;
- breaches of competition or anti-trust law;
- insider trading;
- breaches of import, export, and trade controls;
- tax evasion or facilitation of tax evasion;
- failure to comply with any legal obligations or regulatory requirements;
- bullying, harassment or discrimination;
- breaches of human rights, including modern slavery;
- damage to the environment;
- inappropriate sharing of information (e.g. intellectual property, confidential information, personal information and other proprietary business information);
- misuse of company property or computer systems;
- not following our financial controls; or
- any other breach of our Values or the Code of Ethics.

7. USEFUL INFORMATION

You can raise a concern by calling our Speak Up dedicated phone number: **0800 028 0822** or via our dedicated Speak Up portal <http://www.balfourbeattyspeakup.com/>

You can view our Code of Ethics Hub Site here.

Email the Ethics team at ethics@balfourbeatty.com .