



BAM Nuttall Limited

Ethical business policy

incorporating fair competition and bribery, corruption and fraud prevention

The Board of BAM Nuttall Limited is committed to preventing bribery, corruption, fraud, anti-competitive or unethical business behaviour of all kinds. BAM Nuttall is committed to promoting openness, fairness and transparency and seeks to ensure the highest standards across all areas of its activities. We are committed to ensuring that BAM Nuttall, all our employees and all third parties performing services for or on behalf of us and/or joint venture parties and/or agents ('Associates') abide by the highest professional and ethical standards and comply with all relevant legal obligations.

This includes but is not limited to prevention of:

- theft, misappropriation or misuse of assets for personal, or company benefit
- acceptance or offer of any gift, hospitality, political or charitable donation, inducement, or similar benefit which could reasonably be perceived to be for the purpose of bribery
- any form of blackmail or extortion
- false accounting and/or fraudulent statements with an aim of personal gain or gain for another
- anti-competitive arrangements such as collusion, 'cover pricing' or price fixing
- abuse of market power as a dominant party within a particular market
- making a facilitation payment or bribing a public or foreign official
- unauthorised or unlawful processing of sensitive business data

In particular, we seek to:

- ensure robust processes for the management of the business to assess risk and prevent bribery, corruption, fraud or unethical behaviour.
- ensure fair competition in all that we do
- manage all sensitive business data in an ethical and secure manner
- ensure employees are aware of, and understand, their responsibilities and actions required by this policy and the management system
- provide suitable, confidential, means for the communication of any concerns
- protect BAM Nuttall, its employees and Associates from false accusation of any unethical behaviour

This policy is achieved by the effective operation of our management system together with the active participation, professionalism and commitment of everyone. All employees and Associates are required to raise any concerns they may have with their manager or BAM Nuttall contact in the first instance. If this is inappropriate the report can be made to the Compliance Officer (compliance@bamnuttall.co.uk) or to the independent 'Speak up' facility. (www.speakupfeedback.eu/web/bam)

Following any allegation of bribery, corruption, fraud, anti-competitive or unethical behaviour we shall:

- promptly carry out a robust and independent investigation
- implement disciplinary procedures, including summary dismissal
- notify the police or other authorities as may be appropriate
- take appropriate action with Associates who have breached this policy

The Board regards the responsibility of everyone in implementing this policy to be fundamental to BAM Nuttall meeting its stated commitments. The Board has appointed the Compliance Officer to oversee the implementation of this policy by ensuring appropriate, robust management processes are in place and their effectiveness is reviewed.

This policy is reviewed for continuing suitability on a regular basis and revised as often as may be appropriate.

Stephen Fox
Chief Executive, on behalf of the BAM Nuttall Board

Revised date: 14 May 2018

Last review: 16 Jan 2019