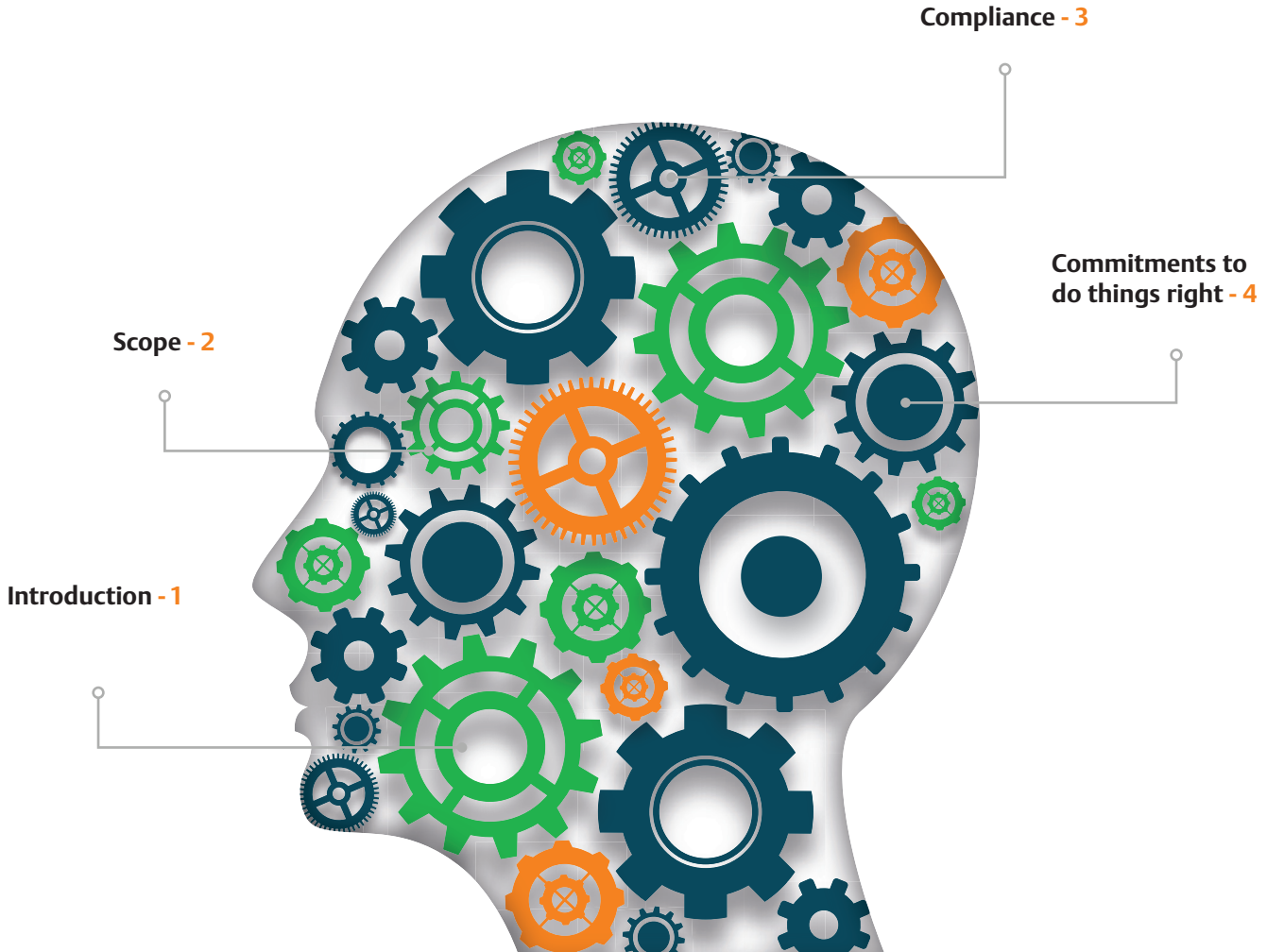




# BAM Vendor Code of Conduct

---

2023



# Introduction

BAM's purpose is clear: *building a sustainable tomorrow*. This is the starting point for everything we do. Our five values reflect the way we present ourselves as BAM, how we behave, and what we stand for. These values form the basis of collaboration with vendors. Our values are sustainable, inclusive, collaborative, reliable and ownership.

We are committed to positive, constructive and long-term business relationships with vendors who we expect to share our values and our commitment to do things right: to operate in a safe, sustainable and ethical way always and everywhere.

This vendor code of conduct ("Vendor Code") sets out requirements for our vendors and

how we want to ensure their compliance. In return, we strive to be a fair and honest partner, firmly believing that relationships built on trust and integrity will be sustainable and beneficial for all.



# Scope

**The Vendor Code applies to vendors - their business and their employees – of goods and services delivered to BAM. The group that we collectively refer to as “vendors” includes suppliers, subcontractors, professional service providers, consultants, intermediaries and agents.**

Vendors must ensure that the practices and principles outlined in this Vendor Code are cascaded throughout its supply chain. We also expect that vendors exercise due diligence in verifying their vendor’s compliance.

The Vendor Code is an integral part of the contractual

relationship between BAM and the vendor. It should not conflict with the applicable (general) terms and conditions, but in case there is such a conflict, this Vendor Code prevails over the terms for the relevant subject matters, unless those terms are more specific and stringent.



# Compliance

BAM requires vendors to comply with the Vendor Code. We believe that having an open dialogue is crucial to support anyone involved in their decision making and to learn from each other. In case of questions on this Vendor Code, vendors can reach out to their Procurement contact or [doingsomethingright@bam.com](mailto:doingsomethingright@bam.com).

BAM is entitled to audit a vendor's compliance in line with the Vendor Code. Accordingly, a vendor must cooperate by providing relevant information that BAM requests, and by making individuals accessible so BAM can conduct a meaningful audit. Also locations where

manufacturing takes place need to be made accessible.

Please note that BAM may terminate the business relationship with a vendor who violates this Code or refuses, if asked, to take appropriate measures (e.g. as part in a remediation plan).



# Commitments to do things right



After a hard day's work, we all want to return home safely again. No task is so important or urgent that it cannot be done safely. This is a fundamental priority for BAM. Our business is built upon providing a safe work environment for employees and we expect our vendors, where relevant, to ensure that we achieve this.

### What do we expect from our vendors?

- ⚙️ Comply with all applicable health & safety legislation.
- ⚙️ Acquire knowledge of the BAM safety standards and comply with the applicable BAM safety rules before starting the job.
- ⚙️ Create a safe working environment. Continually improve health & safety performance towards best industry practice.
- ⚙️ Never put safety aside to get the job done. Stop any activity - including own activities - that are considered not to be safe.
- ⚙️ Discuss any workplace incidents, near misses and any unsafe or unhealthy work conditions with the relevant BAM Safety Manager.
- ⚙️ Never work under the influence of alcohol or drugs, to ensure safety while working.

# Working safely



# Sustainable



A more sustainable world means a brighter future for ourselves and generations to come. Working towards a more sustainable world is an important priority for BAM and part of how we do business every day.

As an industry leader, we raise the bar for social and environmental impact and financial resilience. Today, tomorrow and every day. We expect our vendors to care for the a more sustainable world in their policies and actions when working for and with BAM. We expect our vendors to have ambitious CO<sub>2</sub> reduction targets in place, preferably targets that are validated by Science Based Targets initiative.

## What do we expect from our vendors?

- ✿ Comply with all relevant environmental laws and ensure that all necessary permits are in place.
- ✿ Make and encourage responsible decisions in consideration of the environment, our value chain and our future generations.
- ✿ Act upon ways to reduce their own and BAM's impact on climate change in line with the BAM sustainability strategy and the Corporate Sustainability Reporting Directive (CSRD).
- ✿ Reduce the use of materials, consider using alternative sustainable materials where possible and take action to eliminate waste.
- ✿ Strive to (re)use energy and other natural resources efficiently, while minimizing waste, emissions and noise.
- ✿ Make BAM aware of any non-sustainable elements within in offerings, goods or services.
- ✿ Consider climate adaptive and biodiversity enhancing measures in offerings and projects.
- ✿ Strive to be responsible citizens, who respect other cultures and local traditions and try to create positive impacts through the delivery of products and services.
- ✿ Support local community engagement and volunteering activities that add social value across projects.
- ✿ Care about the communities they operate in by helping to improve the wellbeing, inform involved communities on projects and take into account any concerns of those communities.



Our health and wellbeing are important to every single one of us. BAM aims to provide a mentally healthy and supportive environment for all employees and anyone else working with us. We underline the importance of a work environment where people feel safe to be themselves and are respected as such. We create an environment where everybody feels welcome and valued and expect the same from our vendors. We will not tolerate physical and verbal harassment, bullying, aggression, violence or discrimination on any grounds.

### What do we expect from our vendors?

✿ Contribute to creating an environment where everybody feels welcome and valued.

- ✿ Recognise, value and respect all contributions and be curious about differing perspectives.
- ✿ Consider bias when making decisions and dealing with others.
- ✿ Take responsibility for your own and others' health, safety and wellbeing.
- ✿ Challenge the stigmas and taboos towards mental health.
- ✿ Do not participate in activities that are inappropriate, in harassment, bullying, aggression, violence or discrimination on any grounds or behaviours that exclude others. Speak Up and act if inappropriate activities are noticed.

# Fostering a healthy and safe work environment



# Respecting Human Rights



BAM considers respecting and promoting human rights as an important part of our responsibility in society. We do not tolerate any form of child, forced or compulsory labour in our business or in our supply chain. People who work for BAM, directly or via subcontractors, do so of their own free will. BAM is committed to preventing slavery and human trafficking throughout our operations and those associated with our business. BAM is committed to the Universal Declaration on Human Rights and preventing modern slavery in our operations and supply chain.

## What do we expect from our vendors?

- ✿ Respect the dignity of every person involved and those affected by our projects.
- ✿ Support the principles of equality, fairness, inclusion

and respect when dealing with the recruitment and selection of employees.

- ✿ Do proper due diligence on the working conditions in their supply chain.
- ✿ Do not employ people directly, or through third parties, who may be subject to child or forced labour.
- ✿ Provide employees with wages and benefits that at least meet the minimum amount required by applicable local laws/ regulations.
- ✿ Respect employees' freedom of association. Don't retaliate or discriminate against any person in their work force who chooses to exercise this right.
- ✿ Be alert and critical on the working conditions in the supply chain and raise a concern if they become aware of any unfair working conditions at BAM or by any of BAM's subcontractors or suppliers.

At BAM, we do business honestly and build relationships based on trust. We have zero tolerance for bribery and corruption as they are simply against everything we stand for. Our vendors must never receive, accept, give or promise anything of value to gain an improper business advantage. Engaging in bribery and corruption, including through third parties, can seriously be harmful, for the vendor and its business partners, so and also for BAM. This must be prevented at all times.

### What do we expect from our vendors?

- ☀ Comply with all relevant anti-bribery and anti-corruption legislation in respect of their dealings with BAM.
- ☀ Never receive, accept, give or promise anything of value to gain an improper business advantage. Be alert when dealing with government officials or public entities.
- ☀ Never tolerate extortion, corruption, and/or embezzlement.
- ☀ Do not offer or make unofficial payments to speed up an administrative process or secure a routine government action by an official (facilitation payments).
- ☀ Be transparent about sponsorship or charitable donations.

# Preventing bribery & corruption



# Avoiding conflicts of interest

We do business in a way that is open and transparent and with the highest integrity. Conflicts of interest can arise from close personal relationships, out-of-work activities, discounts, and financial involvement. An actual or potential conflict of interest may jeopardise BAM's reputation and the individuals involved.

## What do we expect from our vendors?

- ✿ Immediately communicate any potential conflict of interest before starting a business relationship and/or during the business relationship with BAM.
- ✿ Do not provide financial or other support to political parties and/or other organisations to influence transactions with or for BAM.



**We do business in a way that is open and transparent**



As a major player in the market, it is BAM's responsibility to contribute to fair competition. When we focus on winning contracts, we do not avoid tough competition, but we compete in a legal and ethical manner. We follow the laws and regulations, wherever in the world we are operating and we expect our vendors to do the same.

We do not do business in sanctioned countries or with sanctioned parties. We comply with applicable sanction laws and regulations regarding transactions in or with specific countries and parties, as well as import and export restrictions for specific services and materials. Also our vendors must comply at all times with those applicable laws, regulations and restrictions.

#### What do we expect from our vendors?

- ⚙️ Compete fairly and comply with antitrust and competition laws in the countries of operations.
- ⚙️ Do not make agreements or carry out practices that are illegal, such as price-fixing, market allocation or abuse of a dominant position.
- ⚙️ Don't share competitive, sensitive information such as price, terms of contracts and tenders with competitors or business partners.
- ⚙️ Do not do business in sanctioned countries or with sanctioned parties and take relevant import and export restrictions into account.
- ⚙️ Provide accurate and truthful information about it to customs and other authorities when required.
- ⚙️ Identify and manage trade

restrictions applicable to the business with us, including those of sanctioned countries and parties. BAM does not accept any materials or services from persons, entities, governments or countries if doing so violates applicable sanction laws and regulations, as well as import and export restrictions.

- ⚙️ Comply with applicable anti-money laundering legislation.

# Competing fairly and comply with sanctions and trade restrictions



# Protecting BAM's assets



It could be necessary for vendors to use assets and resources of BAM. These assets and resources include tools, machines, raw materials, cars and vans, phones, laptops, patents, trademarks, know-how, trade secrets and even our brand. As these assets are vital to our business and entrusted to the care of the vendors, they are responsible to use them in an appropriate way and protect them from any form of misuse, damage, loss or theft.

## What do we expect from our vendors?

- ✿ Protect all BAM assets they use from misuse, damage, loss, and theft when entrusted to their care.
- ✿ Only use BAM company assets for business purposes.
- ✿ Do not use scrap or surplus materials for personal purposes.
- ✿ Treat all BAM information and IT equipment with care.
- ✿ Respect intellectual property rights, including those of BAM.
- ✿ Only share information with authorised colleagues or business partners.
- ✿ Do not misuse BAM information for their personal purposes and respect confidentiality.
- ✿ Do not use BAM IT equipment for inappropriate communication

BAM receives and uses a great deal of (personal) data, such as client information, financial reports, construction specifications and employee details. We handle (personal) data carefully and securely and manage it in a professional, lawful and ethical way.

### What do we expect from our vendors?

☀ Comply with applicable privacy legislation and take measures to protect (personal) data – including data from customers and employees – from being disclosed, changed, destroyed or used for any purpose other than the purpose for which it was provided.

- ☀ Prevent accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data and confidential information.
- ☀ Process personal data for the purposes for which it was collected and be transparent about it.
- ☀ Ensure data is only kept as long as necessary for the intended purpose or legally required and is then securely destroyed.
- ☀ Keep accurate, complete and up-to-date records which may have an impact on the business activities with BAM.
- ☀ Report any suspected data or security breaches to [doingsright@bam.com](mailto:doingsright@bam.com).

# Protecting data and respecting privacy



# SpeakUp!

When vendors see a situation in which our Vendor Code of Conduct is not being followed or when they suspect any misconduct, they can report it to our compliance officer via [doingsthingsright@bam.com](mailto:doingsthingsright@bam.com), so that we can assess and if necessary investigate and learn from it.

Alternatively, BAM has an independent, confidential Speak Up service allowing employees, customers, suppliers or other external stakeholders to raise concerns they may have about unethical, inappropriate or illegal behaviour.

To raise a concern please visit: [www.speakupfeedback.eu/web/bam](http://www.speakupfeedback.eu/web/bam).

This is a multi-lingual, **24-7 service** where concerns, anonymously if necessary, can be raised. Concerns raised are initially assessed by a BAM Compliance Officer to determine the need for investigation. It is also possible to report suspected misconduct externally to local authorities.







