

GRI disclosures

Appendix to annual report 2023

BAM has reported in accordance with the GRI standards. BAM has included the GRI Topic Standards that are relevant to Royal BAM Group.

General Disclosures				
Disclosure	Chapter	(Sub)chapter name	Comment	
The organization and its reporting practices				
101	General foundation	N/A		
2-1	Organizational details	2.1 Backpage	Organisation	
2-2	Entities included in the organization's sustainability reporting	2.1 6.2 8.4	Organisation Reporting period, boundaries and scope List of principal subsidiaries, joint arrangements and association	
2-3	Reporting period, frequency and contact point	Contents 6.2 Backpage	Reporting period and reporting frequency	Publication date of the annual report 2023: February 22nd, 2024.
2-4	Restatements of information	6.3	Climate change Resource use and circular economy	
2-5	External assurance	6.2 8.1	Verification Independent auditor's report and limited assurance report on sustainability information	
Activities and workers				
2-6	Activities, value chain and other business relationships	2.1	Business model Value creation model	
2-7	Employees	6.4	Characteristics of the undertaking's employees Recruitment Diversity metrics Representation in management	Partial omission 2-7 e: not applicable. No significant fluctuations in the number of employees during the reporting period and between reporting periods.
2-8	Workers who are not employees	3.2 6.4	Safety Characteristics of non-employees	Partial omission: information unavailable. BAM works on improving insight in the FTE for workers who are not employees. BAM intends to report externally starting from the reporting year 2025, in accordance with the CSRD.
Governance				
2-9	Governance structure and composition	See comment	See comment	Supervisory Board Rules (link) Corporate Governance Structure (link) Composition of the Supervisory Board (link) Composition of the Executive Board (link)
2-10	Nomination and selection of the highest governance body	See comment	See comment	Supervisory Board Rules (link)
2-11	Chair of the highest governance body	See comment	See comment	Supervisory Board Rules (link)
2-12	Chair of the highest governance body	See comment	See comment	Compliance with the Corporate Governance Code (link) Supervisory Board Rules (link) Executive Board and Executive Committee Rules (link)
2-13	Delegation of responsibility for managing impacts	See comment	See comment	Supervisory Board Rules (link)
2-14	Role of the highest governance body in sustainability reporting	See comment	See comment	Supervisory Board Rules (link)
2-15	Conflict of interest	See comment	See comment	Omission: disclosure not applicable since no conflicts of interest took place. Supervisory Board Rules (link) Compliance with the Corporate Governance Code (link)
2-16	Communication of critical concerns	6.5	Reported incidents	Partial omission 2-16 b: information unavailable. BAM does not report the total number of critical concerns. BAM works on improving insight into the number and the nature of critical concerns and intends to report on this from reporting year 2024 onwards in accordance with CSRD. Critical concerns are reported to the Executive Board at least in quarterly reports, or more often whenever urgency is required. The Executive Board communicates to the Supervisory Board according to planned reporting cycles. The Executive Board reports half yearly to the Audit Committee of the Supervisory Board, or whenever more urgency is required.
2-17	Collective knowledge of the highest governance body	5.1	Edusessions Audit Committee Training	
2-18	Evaluation of the performance of the highest governance body	5.1	Performance assessments, induction and training	

2-19	Remuneration policies	See comment	See comment	2-19 a-iv clawbacks: in cases where an STI has been awarded based on inaccurate (financial) data, the Supervisory Board has the right to adjust the award accordingly, and BAM is entitled to reclaim (any part of) the STI paid to a member of the Executive Board on the basis of incorrect (financial) information. The Company's independent auditor will check the calculations carried out and conclusions reached in connection with the STI plan, and its assessment will be binding. Supervisory Board Rules (link) Corporate Governance Structure (link)
2-20	Process to determine remuneration	See comment	See comment	Supervisory Board Rules (link)
2-21	Annual total compensation ratio	5.2	Internal pay ratio and five-year analysis	Partial omission 2-21 a: information incomplete. In line with BAM's Corporate Governance Code, BAM reports the ratio of the annual total compensation for the organisation's highest-paid individual to the average annual compensation for all employees, instead of using the median annual total compensation. BAM continues to follow the Corporate Governance Code in the future.

Strategy, policies and practices

2-22	Statement on sustainable development strategy	1	Message from the CEO	
2-23	Policy commitments	2.1 3.2 6.5	Value creation model Human rights Fostering a speak up culture	Business Principles (link)
2-24	Embedding policy commitments	2.1 3.2 6.5	Value creation model Human rights Business conduct	
2-25	Process to remediate negative impacts	6.1 6.5	Double Materiality Assessment Business conduct	Grievance procedure (speak up process) is coordinated with the work council, representing BAM's employees. The work council is involved in yearly recalibration of the speak up procedure. When dissatisfied with the speak up process, employees can contact the Group Compliance Officer. BAM tracks the effectiveness of the grievance mechanisms using the Glint survey. This external employee survey asks employees their level of satisfaction with the speak up process and gives the opportunity to leave a comment. The outcomes are reported to the Executive Committee in the compliance report.
2-26	Mechanisms for seeking advice and raising concerns	6.5	Business conduct	
2-27	Compliance with laws and regulations	7	31.3 Investigation	The FIOD investigation as disclosed in 31.1 Investigation is currently ongoing therefore no further information is available at this moment. No significant instances of noncompliance with laws and regulations took place for 2023 therefore no further information available for disclosures 2-27 b-d.
2-28	Membership associations	See comment	See comment	BAM's Charters, memberships and certifications (link)
2-29	Approach to stakeholder engagement	2.3 6.1	Stakeholder engagement Double Materiality Assessment	
2-30	Collective bargaining agreements	6.4	Processes for engaging with own workforce and workers' representatives about impacts	

Material Matters

Disclosure	Chapter	(Sub)chapter name	Comment
3-1	6.1	Double Materiality Assessment	
3-2	6.1	Double Materiality Assessment	
GHG emissions: own operations (scope 1 and 2)			
3-3	3.3 6.2	Decarbonisation Policies	
302-1	3.3	Decarbonisation	Partial omission: 302-1 c-ii, iii, iv.: disclosure not applicable. BAM did not undertake this energy related activity in the reporting year. d: information unavailable. BAM intends to report in accordance with CSRD from 2024 onwards. Comment: g: Global Warming Potential (GWP) source used by BAM is Exiobase.
302-3	3.3	Decarbonisation	
302-4	3.3	Decarbonisation	
305-1	3.3	Decarbonisation	305-1 e: Global warming potential (GWP) source used by BAM is Exiobase.
305-2	3.3	Decarbonisation	Global warming potential (GWP) source used by BAM is Exiobase.
305-4	3.3	Decarbonisation	
305-5	3.3	Decarbonisation	
305-6	See comment	See comment	Omission: disclosure not applicable as BAM uses very little chemicals in its construction processes. Generally, the use of ODS is not a problem in the countries where BAM operates as a result from European and UK regulations.

305-7	Nitrogen oxides (NO _x), sulphur oxides (SO _x), and other significant air emissions	See comment	See comment	Omission: information unavailable. Due to the large amount of different, and continuously changing sites, BAM is not able to measure emissions to air. BAM does have insight in the amount of fuel use, but does not have access to clear conversion factors to calculate the amount of associated emissions (other than CO ₂). At this moment, BAM has no plan in place to start measuring emissions on its sites as this is considered to be unfeasible.
GHG emissions: value chain (scope 3)				
3-3	Management of material topics	3.3	Decarbonisation	
3-3	Management of material topics	3.3 6.2	Decarbonisation Policies	
302-2	Energy consumption outside of the organization	3.3	Decarbonisation	302-2 c: conversion factors are based on Defra (United Kingdom) and CO2emissiefactoren.nl (the Netherlands and Belgium).
302-5	Reductions in energy requirements of products and services	3.3	Decarbonisation	
305-3	Other indirect (Scope 3) GHG emissions	3.3	Decarbonisation	305-3 c: BAM's biogenic CO ₂ emissions, from the combustion of biomass, were 14 kilotonnes in 2023. 305-3 f: global warming potential (GWP) source used by BAM is Exiobase.
Adaptation to climate change				
3-3	Management of material topics	3.3 6.2	Climate adaptation Policies	
Pollution of air and soil: upstream operations				
3-3	Management of material topics	6.2 6.3	Policies Pollution	Partial omission: information unavailable. BAM currently does not have goals, targets, and indicators on this topic. From 2024 onwards, BAM intends to report on upstream pollution in accordance with CSRD. During the initial reporting years, the data is anticipated to be derived based on estimations and calculations.
Biodiversity loss: own operations				
3-3	Management of material topics	3.3 6.2	Biodiversity Policies	
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	See comment	See comment	Omission: information unavailable. Although biodiversity is included in BAM's sustainability strategy, the topic emerged as a material matter for the first time during the 2023 Double Materiality Assessment. Implementation of the reporting processes is ongoing. BAM intends to report externally on this matter starting from the reporting year 2024, in accordance with the CSRD, aligning to the CSRD disclosure requirements on this topic.
304-2	Significant impacts of activities, products and services on biodiversity	See comment	See comment	Omission: information unavailable. Although biodiversity is included in BAM's sustainability strategy, the topic emerged as a material matter for the first time during the 2023 Double Materiality Assessment. Implementation of the reporting processes is ongoing. During 2023 BAM developed a biodiversity assessment that will be used on a selection of projects from the start of 2024. This assessment includes among other topics the impacts on pollution, invasive species, and habitat management. BAM intends to report externally on this matter starting from the reporting year 2024, in accordance with the CSRD, aligning to the CSRD disclosure requirements on this topic.
304-3	Habitats protected or restored	See comment	See comment	Omission: information unavailable. Although biodiversity is included in BAM's sustainability strategy, the topic emerged as a material matter for the first time during the 2023 Double Materiality Assessment. Implementation of the reporting processes is ongoing. During 2023 BAM developed a biodiversity assessment that will be used on a selection of projects from the start of 2024. The protection of habitats is included in this assessment. BAM intends to report externally on this matter starting from the reporting year 2024, in accordance with the CSRD, aligning to the CSRD disclosure requirements on this topic.
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	See comment	See comment	Omission: information unavailable. Although biodiversity is included in BAM's Sustainability Strategy, the topic emerged as a material matter for the first time during the 2023 Double Materiality Assessment. Implementation of the reporting processes is ongoing. During 2023 BAM developed a biodiversity assessment that will be used on a selection of projects from the start of 2024. The assessment includes the analysis of threatened species in the area. BAM intends to report externally on this matter starting from the reporting year 2024, in accordance with the CSRD, aligning to the CSRD disclosure requirements on this topic.
Ecosystem services				

3-3	Management of material topics	6.3	Ecosystem services	<p>Partial omission: information unavailable. This topic emerged as a material matter for the first time during the 2023 Double Materiality Assessment. Implementation of the reporting processes is ongoing.</p> <p>During 2023 BAM developed a biodiversity assessment that will be used on a selection of projects from the start of 2024. The assessment includes the topic of well-being.</p> <p>BAM intends to report externally on this matter starting from the reporting year 2024, in accordance with the CSRD, aligning to the CSRD disclosure requirements on this topic.</p>
Depletion of raw materials				
3-3	Management of material topics	3.3	Targets beyond 2023	
		6.2	Reduce use of non-biobased primary (virgin) material Policies	
Circular design				
3-3	Management of material topics	3.3	Material passports and circularity assessment	
		6.2	Policies	
301-1	Materials used by weight or volume	6.3	Resource use and circular economy, table 41 Material consumption in The Netherlands	<p>Partial omission 301-1a: information incomplete for division United Kingdom and Ireland, and Belgian companies. BAM discloses the use of key construction materials for the Netherlands. Disclosing all material used for all projects is unfeasible for BAM, due to the large variety in projects and supply chains. BAM is working on improving insights in the use of key materials as part of its circularity targets in the sustainability strategy and expects to expand the scope of reporting on key materials to the whole Group within a few years. BAM is currently not considering to expand the scope of the type of materials disclosed, and will continue to report on aggregated key materials (asphalt, concrete, steel and timber).</p>
301-2	Recycled input materials used	6.3	Resource use and circular economy, table 41 Material consumption in The Netherlands	
301-3	Reclaimed products and their packaging materials	See comment	See comment	<p>Omission: disclosure not applicable to the construction industry. Reclaiming products and their packaging is a big issue in businesses related to e.g. convenience and shopping goods.</p>
Waste reduction				
3-3	Management of material topics	3.3	Circularity	
		6.2	Waste reduction Policies	
306-1	Waste generation and significant waste-related impacts	3.3	Circularity	
306-2	Management of significant waste-related impacts	3.3	Circularity	
306-3	Waste generated	3.3	Circularity	
Waste reuse and recycling				
3-3	Management of material topics	3.3	Circularity	
		6.2	Policies	
306-4	Waste diverted from disposal	3.3	Circularity	<p>Partial omission 306-4b, 306-4c: information incomplete. Re-use and recycling are reported in the same category.</p> <p>Partial omission 306-4b, 306-4c, 306-4d: information incomplete. Hazardous waste and non-hazardous waste are reported in the same category. Reporting on these separate categories is required under the CSRD from reporting year 2024 onwards and BAM intends to comply to this timeframe.</p>
306-5	Waste directed to disposal	3.3	Circularity	<p>Partial omission 306-5b, 306-5c: information incomplete. Re-use and recycling are reported in the same category.</p> <p>Partial omission 306-5b, 306-5c, 306-5d: information incomplete. Hazardous waste and non-hazardous waste are reported in the same category. Reporting on these separate categories is required under the CSRD from reporting year 2024 onwards and BAM intends to comply to this timeframe.</p>
Occupational health and safety: own operations				
3-3	Management of material topics	3.2	Safety	
		6.2	Policies	
		6.4	Health and safety metrics	
403-1	Occupational health and safety management system	3.2	Safety	
		6.4	Health and safety metrics	
403-2	Hazard identification, risk assessment, and incident investigation	6.3	Health and safety metrics	
403-4	Worker participation, consultation, and communication on occupational health and safety	3.2	Health and well-being	Executive Committee rules 3.25 Relationship with the works council
403-5	Worker training on occupational health and safety	3.2	Health and well-being	

403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	3.2	Health and well-being	
403-8	Workers covered by an occupational health and safety management system	6.4	Health and safety metrics	
403-9	Work-related injuries	3.2 6.4	Safety Health and safety metrics	
Work-related ill health: own employees				
3-3	Management of material topics	3.2 6.2 6.4	Health and well-being Policies Health and safety metrics Work related ill-health	Partial omission: information unavailable. BAM currently does not have goals, targets, and indicators on this topic. This topic is managed by the divisions and by external parties to guarantee confidentiality of personal information. Projects are ongoing to improve availability of statistical information. Reporting is required under the CSRD from annual report 2025 onwards and BAM intends to comply to this timeframe.
403-10	Worked related ill health	See comment	See comment	Omission: information unavailable. This topic is managed by the divisions and by external parties to guarantee confidentiality of personal information. Projects are ongoing to improve availability of statistical information. Reporting is required under the CSRD from annual report 2025 onwards and BAM intends to comply to this timeframe.
403-3	Occupational health services	3.2	Health and well-being	
403-6	Promotion of worker health	3.2	Health and well-being	
403-1, 403-2, 403-4, 403-5, 403-7 403-8: Refer to Occupational Health & Safety in this table.				
Diversity within the company's own workforce (own employees)				
3-3	Management of material topics	3.2 6.2	Female representation Policies	
405-1	Diversity of governance bodies and employees	6.4	Diversity metrics	
405-2	Ratio of basic salary and remuneration of woman to men	See comment	See comment	Omission: information incomplete for companies in the Netherlands and Belgium. This requirement is part of legislation in the United Kingdom and Ireland. BAM is in the process of gathering this information in the Netherlands and Belgium and intends to report on this in annual report 2024 onwards.
Return on inclusion				
3-3	Management of material topics	3.2 6.2	Return on inclusion Policies	
Training and skills development (own employees)				
3-3	Management of material topics	6.2 6.4	Policies Training and skills development metrics	
404-1	Average hours of training per year per employee	See comment	See comment	Omission: information unavailable. Training is managed by the divisions separately using different approaches. Projects are ongoing to align these approaches so comparable data can be gathered. BAM intends to report on this in annual report 2024 onwards.
404-2	Programs for upgrading employee skills and transition assistance programs	6.4	Training and skills development metrics	Transition assistance programs are in place in line with legislative requirements of the countries where BAM operates. E.g. severance pay is required by law in the Netherlands.
404-3	Percentage of employees receiving regular performance and career development views	6.4	Training and skills development metrics	All BAM's employees receive regular performance reviews. The yearly perform and develop cycle runs over year-end, resulting in part of the employees receiving their career development review of 2023 in 2023, the other part beginning of 2024.
Corporate culture				
3-3	Management of material topics	3.2 6.2 6.5	Leadership culture Policies Governance information	
Social value				
3-3	Management of material topics	3.2 6.2	Social value Policies	
413-1	Operations with local community engagement, impact assessments, and development programs	See comment	See comment	Omission: information unavailable. This topic emerged as a material matter for the first time during the 2023 Double Materiality Assessment. Implementation of the reporting processes is ongoing. Across BAM's divisions action is taken to deliver social value to communities, in line with BAM's sustainability strategy and local legislative requirements. During 2023 BAM division United Kingdom and Ireland continued the development of a reporting tool for measurement of social value. BAM division the Netherlands continued to deliver social value, but efforts are not yet reported by the division on a consolidated basis. BAM intends to report externally on this matter starting from the reporting year 2024, in accordance with the CSRD, aligning with the CSRD disclosure requirements on this topic.

413-2	Operations with significant actual and potential negative impacts on local communities	See comment	See comment	<p>Omission: information unavailable. This topic emerged as a material matter for the first time during the 2023 Double Materiality Assessment. Implementation of the reporting processes is ongoing.</p> <p>Across BAM's divisions action is taken to deliver social value to communities, in line with sustainability strategy and local legislative requirements. During 2023 BAM division United Kingdom and Ireland continued the development of a reporting tool for measurement of social value. BAM division The Netherlands continued to deliver social value, but efforts are not yet reported by the division on a consolidated basis.</p> <p>BAM intends to report externally on this matter starting from the reporting year 2024, in accordance with the CSRD, aligning to the CSRD disclosure requirements on this topic.</p>
Prevention and detection of corruption and bribery				
3-3	Management of material topics	6.2 6.5	Policies Business conduct	
205-1	Operations assessed for risks related to corruption	4.1	Regulatory and reputation	<p>Risk assessment is part of the Enterprise Risk Management process.</p> <p>Partial omission 205-1 a: information unavailable. This topic emerged as a material matter for the first time during the 2023 Double Materiality Assessment. Implementation of the reporting processes is ongoing.</p> <p>BAM intends to report externally on this matter starting from the reporting year 2024, in accordance with the CSRD, aligning to the CSRD disclosure requirements on this topic.</p>
205-2	Communication and training about anti-corruption policies and procedures	6.5	Training employees	<p>Partial omission 205-2 c and e: breakdown by employee category and region: information unavailable. This topic emerged as a material matter for the first time during the 2023 Double Materiality Assessment. Implementation of the reporting processes is ongoing.</p> <p>BAM intends to report externally on this matter starting from the reporting year 2024, in accordance with the CSRD, aligning with the CSRD disclosure requirements on this topic.</p> <p>Comment: 205-2 a and b: Code of Conduct was communicated to all employees and governance body members. d: all governance body members have received training. e: refer to 6.5 subchapter 'Training employees' for percentage of employees that received training.</p>
205-3	Confirmed incidents of corruption and actions taken	See comment	See comment	<p>Partial omission a, b, and c: information unavailable. This topic emerged as a material matter for the first time during the 2023 Double Materiality Assessment. Implementation of the reporting processes is ongoing.</p> <p>BAM intends to report externally on this matter starting from the reporting year 2024, in accordance with the CSRD, aligning to the CSRD disclosure requirements on this topic.</p> <p>d) No public legal cases were brought against the organization or its employees during the reporting period.</p>
Protection of data and respecting privacy				
3-3	Management of material topics	6.2 6.5	Policies Business conduct Entity specific - Protection of data and respecting privacy	
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	6.5	Protection of data and respecting privacy	<p>Partial omission a and b: information unavailable. This topic emerged as a material matter for the first time during the 2023 Double Materiality Assessment. Implementation of the reporting processes is ongoing.</p> <p>BAM intends to report externally on this matter starting from the reporting year 2024 in accordance with the CSRD, aligning to the CSRD disclosure requirements on this topic.</p>