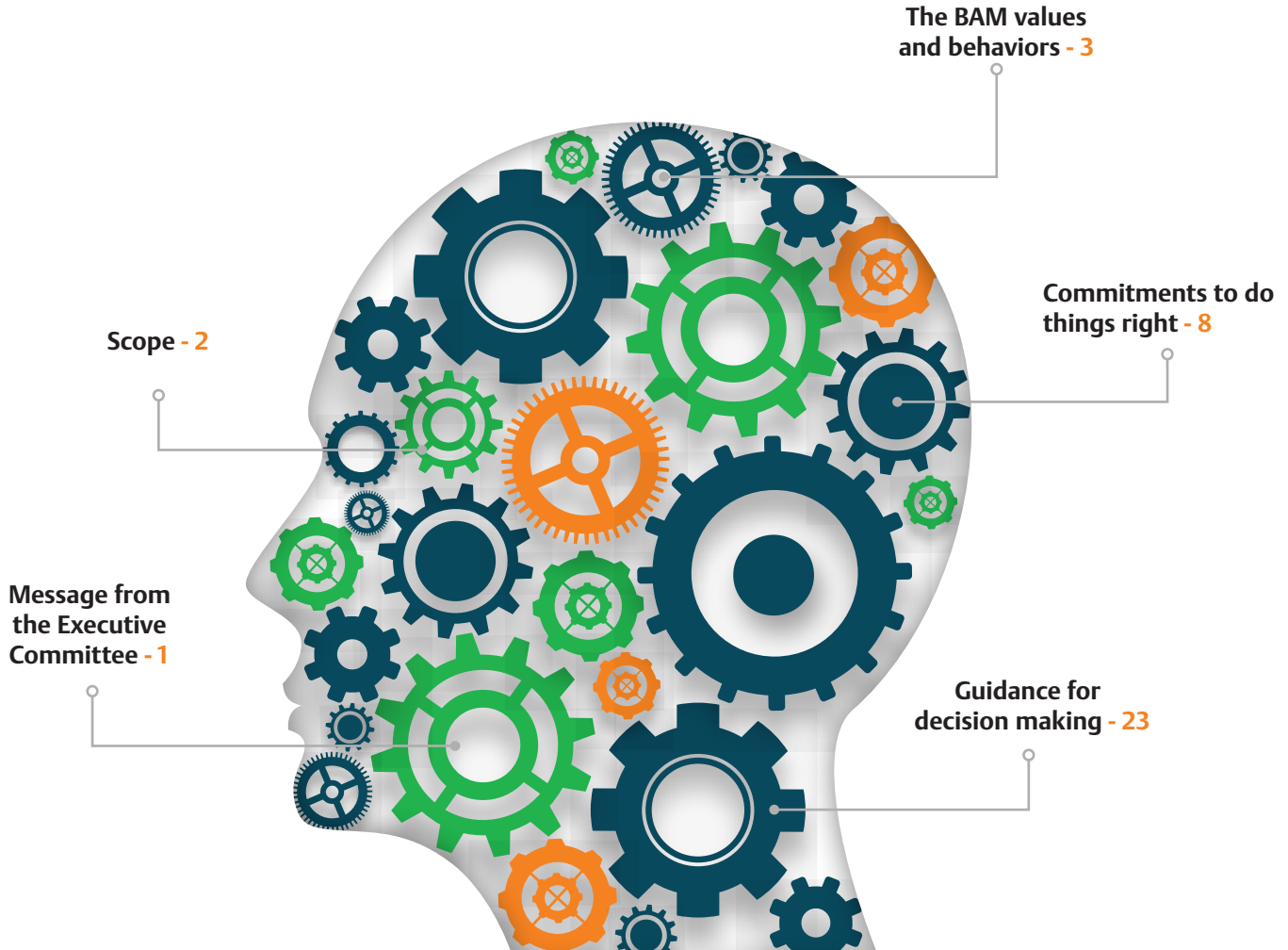




# Code of Conduct

Doing things right.

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# Message from the Executive Committee

**Our purpose is clear:** building a sustainable tomorrow. This is the starting point for everything we do. The art of building is about building for communities; it's about building for life. Where others stop, we go further, leading the way towards a sustainable tomorrow for us and future generations. As an industry leader, we raise the bar.

It's vital that we remain true to our values and do things right, which we guide by this Code of Conduct (hereafter 'Code').

Our Code helps you to understand how to uphold our values and your

obligations and responsibilities to do things right. It provides a framework of commitments to guide our behaviour towards our colleagues, our customers, our business partners, supply chain and the wider communities in which we work.

We encourage you to read this Code and to consider how it applies to you. If anything in the Code is unclear, if you are in doubt about anything you read or have concerns about anything you see then we urge you to speak up. If you ever find yourself in a situation where you are unsure how to act or have

concerns about the way others are acting, always discuss this with your manager, HR business partner or compliance officer. You could also contact our independent, confidential Speak Up service. By raising your concern, you can get support and we can learn how we can improve in the future.

**We count on you to put our values and commitments from this Code at the heart of our business. Only then will we be able to create sustainable environments that enhance people's lives and maintain the strong BAM brand for which we can all be proud to work.**

**'We count on you to put our values and commitments from this Code at the heart of our business.'**

# Scope

**This Code applies to all BAM employees, contract and temporary workers. Anyone acting for or on behalf of BAM e.g. consultants, contractors, and agents, are also required to apply the Code or similar values and standards when working for or on behalf of BAM.**

As BAM we expect you to act with integrity and honesty. Acting in compliance with legislation, regulations, generally accepted social standards and our Code is a requirement for all of us. Violation may have consequences. These could be disciplinary or labour-law

measures, depending on the seriousness of the violation. Violation can also result in criminal prosecution.

You can find more information on our Code and related policies and procedures on BAM Connect and the BAM Policy Framework.

# The BAM values

BAM employs thousands of people. Different people with different backgrounds. Yet we also have a shared BAM identity. Our five values reflect the way we present ourselves as BAM, how we behave as colleagues and what we stand for.

**Our values:** sustainable, inclusive, collaborative, reliable and ownership help us to achieve our ambitions. Today and tomorrow.

Our values form the basis for who we are and what we do.

The Code of Conduct tells us what is expected of us and offers practical guidance to help each of us live BAM's values. **The Code helps us to do things right.**



# Sustainable



*Take action today  
for our sustainable  
tomorrow*

## Why is this important?

A more sustainable world means a brighter future for ourselves and generations to come.

As an industry leader, we raise the bar for social and environmental impact and financial resilience. Today, tomorrow and every day.

## Behaviors

- ✿ I make and encourage responsible decisions in consideration of the environment, our business and our future generations.
- ✿ I take steps to reduce our carbon footprint.
- ✿ I work closely with clients and partners and advise them on solutions for all stakeholders.



### Why is this important?

We create an environment where everybody feels welcome and valued. Welcoming diversity and inviting different perspectives is how we unleash our productivity and creativity. Because our differences make us stronger.

### Behaviors

- ✿ I recognise, value and respect all contributions and am curious about differing perspectives.
- ✿ I consider my own bias when making decisions and dealing with others.
- ✿ I speak up when I notice behaviours that exclude others.

## Inclusive



### Why is this important?

Reliability and trust are the foundations of our success. As we take on new challenges, we are clear about expectations and keep our promises. We can rely on each other as our clients and partners rely on us.

### Behaviors

- ✿ I do what I say I will do.
- ✿ I am consistent in my commitment to delivering my work.
- ✿ I set clear expectations of how and when I will perform my work.

## Reliable



# Ownership



*Outcomes  
start with  
ownership*

## Why is this important?

When we take responsibility for challenges, we find solutions. When we take accountability for our decisions, we create predictable and positive impact. When we act with consideration for our customers, partners and each other, we create a safe, healthy BAM for all.

## Behaviors

- ✿ I take responsibility for my own and others' health, safety and wellbeing.
- ✿ I hold myself accountable for my work and ask for clarity if things are unclear.
- ✿ I ask for feedback, reflect and learn from my experiences.

# Collaborative



*Together  
we thrive*

## Why is this important?

Success comes from all teams working together. Because when we work together and build relationships, our unique combination of talents and know-how maximises our team performance.

## Behaviors

- ✿ I communicate openly, honestly and respectfully.
- ✿ I share knowledge and learn from others.
- ✿ I work with others, as one team.



**Commitments  
to do things  
right**



# Working Safely

## Why is this important for you?

At BAM, safety is not just a priority – it is part of our identity. Every one of us has a role to play in making sure we all go home safe and well, every single day.

This means more than just following rules; it's about creating a culture where we look out for one another, speak up when something doesn't feel right, and feel empowered to act.

No task is so important or urgent that it cannot be done safely. We put the safety of ourselves, our colleagues and other stakeholders we work with daily, first.

## What do we expect from you?

- ⚙️ Know our safety standards and comply with the BAM Lifesaving rules and supporting Principles.
- ⚙️ Never put health and safety aside to get the job done. Stop any activity - including your own - that you believe is not healthy or safe.
- ⚙️ Never work under the influence of alcohol or drugs.
- ⚙️ Report any workplace incidents, near misses and discuss any unsafe or unhealthy work conditions with your manager or Safety Manager.

Everyone **Safe and Well** Every Day



# Fostering a healthy and safe work environment



## Why is this important?

Our health and wellbeing are important to everyone. BAM is committed to providing all employees and everyone who works with us a mentally healthy and supportive environment. We recognize the importance of a work culture in which people feel safe to be themselves and are respected as such. We create an environment in which everyone feels welcome and valued — regardless of age, gender, ethnicity, religion, gender identity, sexual orientation, disability, or other characteristics — and we expect the same from our suppliers. Harassing anyone physically or verbally, bullying, showing aggression or violence, or discriminating, for any reason, will not be tolerated.

## What do we expect from you?

- ✿ Take care of your own mental health and wellbeing and seek help when you need it.
- ✿ Support your colleagues and know where to signpost them if you feel they do need some help.
- ✿ Do not engage in activities that are inappropriate, offensive or humiliating or intimidating to others. Just because something is not offensive to you, does not mean that it will not be to others.
- ✿ Challenge the stigmas and taboos towards mental health.
- ✿ Do not participate in harassment, of any kind, bullying, aggression, violence or discrimination on any grounds or behaviours that exclude others and Speak Up and act if you notice it.

# Respecting Human Rights

## Why is this important?

We see 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. You have the right to freedom of association and collective bargaining, where permissible by law. We are also committed to the Universal Declaration on Human Rights and preventing modern slavery in our operations and supply chain.

## What do we expect from you?

- ✿ Respect the dignity of every person you encounter and those affected by our projects.
- ✿ Do proper due diligence on the working conditions in our supply chain.
- ✿ Be alert and critical on the working conditions in our supply chain.
- ✿ Raise a concern if you become aware of any unfair working conditions at BAM or by any of BAM's subcontractors or suppliers.
- ✿ Do not employ people directly, or through third parties, who we believe to be subject to child or forced labour.



# Preventing bribery, corruption and fraud



## Why is this important?

At BAM, we do business honestly and build relationships based on trust. We have zero tolerance for bribery, corruption and fraud as they are simply against everything we stand for. We do not receive, accept, give or promise anything to gain an improper business advantage. Bribes can be hidden in commissions, fees, sponsoring, discounts and more. It is not allowed to gain an advantage by using deceit or dishonesty.

Engaging in bribery, corruption or fraud, including through third parties, can seriously harm you, our business partners and BAM.

## What do we expect from you?

- ✿ Never receive, accept, give or promise anything to gain an improper business advantage. Be alert when dealing with government officials or public entities.
- ✿ Do not offer or make unofficial payments to speed up an administrative process or secure a routine government action by an official (facilitation payments).
- ✿ Do not agree to sponsorship or charitable donations other than in accordance with company policy, report any concerns to your manager or compliance officer. Don't make political donations.
- ✿ Do not give or accept cash or its equivalent (e.g. cheques, vouchers, gift certificates, or pre-paid cards). Do not accept cash for services, goods or equipment.

### Why is this important?

Giving and receiving gifts and hospitality can contribute to building and retaining good relationships with clients, suppliers and other partners. However, some gifts and hospitality can be viewed as inappropriate or even as a bribe. This can harm you, business partners and BAM. Always think carefully about the risk of influencing decision making before offering or accepting gifts and invitations.

### What do we expect from you?

- ⚙️ Never offer or accept gifts or hospitality in return for a favourable decision or business advantage. Ask yourself the following questions:
  - Does it have a business purpose?
  - Is the value proportionate?
  - Is the timing and nature appropriate?
  - Is it allowed under the givers and receivers's policy and local law?
- ⚙️ If you wish to offer a gift or hospitality to a government official, consult your manager or compliance officer in advance.
- ⚙️ Request approval for gifts or invitations valued at more than 100 euros/British pounds through the BAM gifts and invitations register on BAM Connect.

# Treating gifts and hospitality responsibly



# Avoiding conflicts of interest



## Why is this important?

When your personal interest conflicts with your responsibilities as a BAM employee, we refer to a conflict of interest. Conflicts of interest can arise from close personal relationships, out-of-work activities, discounts, and financial involvement e.g., shares in BAM's business partners. An actual or potential conflict of interest may jeopardise BAM's reputation and the individuals involved. Register any potential conflicts of interest in BAM People as soon as you become aware of them to determine the right course of action and appropriate measures.

## What do we expect from you?

- ⚙️ Ensure the decisions you make at BAM are not influenced by personal interests or the interests of close personal relationships.
- ⚙️ Register all potential conflicts of interest, such as ancillary activities, financial interests, or close personal relationships, in BAM People and discuss it with your manager or compliance officer to ensure appropriate measures are taken, if deemed necessary.
- ⚙️ Do not enter into agreements with BAM Group companies for personal purposes without prior written permission from Division Management.
- ⚙️ Withdraw from decision-making that creates an actual or perceived conflict of interest.



### Why is this important?

As a major player in the market, it is our 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. When you (un)intentionally violate competition laws, it can result in significant criminal and civil penalties for BAM, the parties involved and potentially for yourself.

### What do we expect from you?

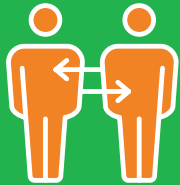
- ✿ Only collect information about competitors or business partners via public sources and not from your competitor or client.
- ✿ Adhere to the laws and regulations that apply to the tendering procedure.
- ✿ Don't share competitive, sensitive information such as price, terms of contracts and tenders with competitors or business partners.
- ✿ Discuss any (attempted) improper conversation with a competitor with the Legal Function.

**We compete in a legal and ethical manner.**

# Competing fairly



# Working with reliable business partners



## Why is this important?

We are committed to positive and long-term business relationships with organisations that have values aligned with our own. We expect our partners to follow laws and regulations and make health and safety, sustainability and integrity a priority to protect you and BAM.

If we have concerns about how a business partner operates, we can carry out investigations to verify that our standards of compliance and ethical standards are being met. If a party does not demonstrate compliance and ethical behaviour in line with our expectations, there will be consequences for the relationship. 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.

## What do we expect from you?

- ✿ Involve the procurement department in entering into agreements with external business partners to ensure that we only collaborate with those who have a record of good practice and performance, and who apply similar values and standards as BAM.
- ✿ Do not use suppliers, subcontractors or any party with the aim of violating or circumventing laws and regulations.
- ✿ Do not do business in sanctioned countries or with sanctioned parties and take relevant import and export restrictions into account.
- ✿ Involve the Legal Function in case of questions or doubts about any sanctions / restrictions regarding (services to and procurement from) different business partners. Always involve the legal department if the business partner is located outside BAM's home countries.

### Why is this important?

To do your job every day, you use company assets. These assets 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 your care, you are responsible for protecting them from any form of misuse, damage, loss or theft.

### What do we expect from you?

- ✿ Protect all BAM assets you use from misuse, damage, loss, and theft when entrusted to your care.
- ✿ Only use BAM company assets for business purposes and not for personal purposes unless specifically allowed.
- ✿ Do not use scrap or surplus materials for personal purposes.
- ✿ Treat all BAM information and IT equipment with care.
- ✿ Only share information with authorised colleagues or business partners.
- ✿ Do not misuse BAM information for your personal purposes and respect confidentiality.
- ✿ Use your BAM e-mail account only for business purposes.

# Protecting BAM's assets



# Protecting data and respecting privacy



## Why is this important?

We receive and use a great deal of (personal) data, such as client information, financial reports, construction specifications and employee details. If your job requires you to handle (personal) data, you are entrusted to handle this carefully and securely and that you manage personal data in a professional, lawful and ethical way. Abuse of (personal) data can cause harm to you, BAM and society.

## What do we expect from you?

- ✿ 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 the data you use is correct and relevant.
- ✿ Make sure only the right people have access to the data they need for their work.
- ✿ Ensure data is only kept as long as necessary for the intended purpose or legally required and is then securely destroyed.
- ✿ Involve your Data Protection Manager and Information Security Manager in new data driven development or when you intend to use Artificial Intelligence (AI).
- ✿ Report any suspected data or security breaches to your Data Protection Manager or Information Security Manager.

### Why is this important?

It is possible that your work gives you access to confidential information about BAM or other companies. This kind of information can be price sensitive if listed companies are involved. BAM employees cannot use or share the information with others, to avoid breaking laws and regulations and possible criminal prosecution.

### What do we expect from you?

- ⚙️ As an employee you and people close to you might have access to price-sensitive information and have restrictions on when you can buy or sell your BAM shares. Follow guidance if you are considered a project insider or permanent insider.
- ⚙️ Do not use price-sensitive information of BAM or other listed companies to deal in shares.
- ⚙️ Do not share price-sensitive information with others or recommend or encourage anyone else to deal in shares based on price-sensitive information, except where the disclosure is part of your regular duty or function.

# Preventing insider dealing



# Administering and reporting with integrity



## Why is this important?

Our business decisions need to be made on accurate and reliable information. Our records, accounts, policies and documents are made with integrity and in accordance with our accounting policies, procedures and instructions. Project accounts and records must also be complete, correct and transparent. This applies for both the financial and non-financial records (relating to safety, compliance, sustainability, etc).

## What do we expect from you?

- ✿ Make sure that your accounts and records are accurate and complete.
- ✿ Do not make entries that conceal the true nature of a transaction or draw up incorrect documents, such as incorrect invoices, estimates, and proposals to customers.
- ✿ Ensure that costs or hours are not allocated to projects to which they do not pertain.
- ✿ Cash payments are not permitted.
- ✿ Substantiate your expense claims and comply with applicable declaration guidelines.

### Why is this important?

We communicate in all sorts of ways, and we should always be aware that everything we write or say reflect our values. Not only in internal communication, such as an email to a colleague, but also in our external communications, such as social media, press releases, media statements, publications, advertising and public presentations. Our communication should be accurate and reliable. We keep an open mind in dialogue with those affected by our operations and we respond to inquiries and communicate with the parties concerned in a professional manner.

### What do we expect from you?

- ✿ Communicate with respect, dignity and integrity, both internally as well as externally.
- ✿ Exercise caution and common sense when using the internet and social media.
- ✿ Only speak to the media on behalf of BAM when you are authorized to do so and refer media requests to the applicable communication department.
- ✿ Never disclose information about projects without the prior consent of the applicable communication department.

**We communicate  
with integrity and  
in line with our values**

# Communicating with care



# Speak up!



## Why is this important?

When working with BAM, you could be confronted with difficult situations or dilemmas where it is not always clear what you should do. We believe that having an open dialogue is crucial to support you in your decision making and to learn from each other. However, raising your dilemma or concern is not always easy and takes courage. If you would like advice on any matter relating to the Code, speak to your line manager or your compliance officer.

## What do we expect from you?

When you see a situation in which our Code is not being followed or when you suspect any misconduct, you have an obligation to report it, so that we can assess and if necessary, investigate and learn from it.

There are different ways to speak up:

- ✿ Speak directly with your line manager or any manager you trust.
- ✿ Contact HR.
- ✿ Speak to Compliance.
- ✿ Use the independent Speak Up service, via <https://bam.speakup.report/en-GB/royalbamgroup/home>. This service is available 24 hours a day, seven days a week. You can submit a report anonymously if you wish.

Confidentiality is respected and information will only be shared with designated people required for the investigation. Any retaliation – whether direct or indirect – against employees who raise a concern may result in disciplinary action up to and including dismissal.

On BAM Connect and BAM.com you can find our Speak Up procedure and more guidance on how to raise your concern.

# Guidance for decision making

This Code is not a substitute for your good judgment, and it cannot cover every conceivable situation. To help you or your team think about any problem you may have, work through the following questions:

- ⚙️ **Can I explain a decision or action to others?**
- ⚙️ **Am I willing to be held accountable for this decision?**
- ⚙️ **Does it support BAM's reputation?**
- ⚙️ **Am I following the BAM Code of Conduct, policies or procedures?**
- ⚙️ **If this becomes public knowledge, will I still feel I have done the right thing?**

If the answer to any of these questions is 'no', do not do it, the action may have serious consequences. In case of questions or doubts, always contact your manager or compliance officer.



