

Royal BAM Group

Preventing Bribery, Corruption and Fraud Policy Statement

The Executive Committee of Royal BAM Group is committed to doing things right and preventing bribery, corruption and fraud.

This policy is applicable to all Royal BAM Group activities and all its companies, employees and any other representatives (hereafter 'BAM').

BAM's key principles to prevent bribery, corruption and fraud are:

- BAM does not tolerate bribery, corruption and fraud in line with law, regulation and the BAM Code of Conduct.
- Business must be conducted honestly, without engaging in bribery, corruption or fraud.
- Employees of BAM (direct or indirect, contract or temporary) must not give or receive anything of value for the purpose of encouraging improper business performance or gaining any improper business advantage. Neither do employees use deceit or trickery to gain a financial or personal advantage. Facilitation payments are prohibited.
- Bribery, corruption and fraud are prohibited with respect to any person. Engaging in bribery, corruption or fraud, even indirectly or through third parties, may lead to dismissal, end of a business relationship, and, in addition to substantial fines and even imprisonment.
- BAM takes appropriate steps to prevent third parties, who provide services on BAM's behalf, to engage in bribery, corruption and fraud.
- Sponsorships or charitable donations must be carried out transparently and recorded fairly and honestly.
- No donations should be made to political individuals or entities.
- Gifts and hospitality (offered or accepted) must be for business purpose, reasonable, proportionate and appropriate in the circumstances. Gifts or hospitality over £100 (or €100) must be approved in advance by line management and accurately recorded.
- All BAM's books and accounts must be accurate and reasonably detailed to reflect all obligations and transactions and must not include false, artificial or misleading content.

BAM's approach provides the framework to set and monitor objectives with key focus on:

Management system

- Deliver a clear framework for managing bribery, corruption and fraud risks, for ensuring appropriate controls and for monitoring effectiveness.

Due diligence

- Follow due diligence and risk assessment procedures before engaging with third parties.

People and communication

- Increase awareness, knowledge and skills to prevent bribery, corruption and fraud and to be able to recognise potential risks by mandatory training modules and workshops.

Speak up

- Employees have a duty to speak up or report concerns of any incident of actual or suspected bribery, corruption and fraud. Reports are made in confidence, can be made anonymously and reporting will be handled with appropriate care.

This policy is achieved by effective operation of the integrated management systems together with the active leadership, participation, professionalism and commitment of all internal stakeholders involved. The management systems aim to meet the requirements of BAM, its clients and other external stakeholders.

The Executive Committee regards the responsibility of management in implementing this policy statement to be fundamental to BAM meeting its standards and commitments.

BAM has appointed a Director Governance and Compliance for the Group to ensure awareness of this policy is promoted throughout the company, the effectiveness is monitored and areas for continual improvement identified and implemented.

Ruud Joosten
Chief Executive Officer
For and on behalf of the Executive Committee of Royal BAM Group



This policy statement has been approved electronically. Proof of approval can be seen upon request.