BAM Construct UK Ltd



Anti-Bribery and Corruption Policy

Policy Statement

BAM Construct UK Limited (BAM) takes a zero-tolerance approach to bribery and corruption of all kinds. This reflects the core values of the business to promote openness and transparency and to seek the highest professional standards across its different areas of activities. BAM is committed to ensuring that it and all employees and all third parties performing services for or on behalf of BAM and / or joint venture parties and / or agents ('Associates') abide by the highest ethical standards.

This policy and related procedures set out BAM's commitment that it and its employees and Associates will adhere strictly to all relevant legislation in relation to bribery and corruption and follow any procedures designed by the business to prevent bribery.

Employees must not offer, promise or give bribes and they must not request or receive bribes. BAM will also expect the highest standards of compliance in this area from all of its Associates.

BAM will take disciplinary action against employees who breach this policy or related procedures. This includes the sanction of summary dismissal in cases where employees offer, give or receive bribes. BAM will take appropriate action with its Associates who breach this policy or related procedures.

Employees have wider duties to speak up or report malpractice in this area or related procedures. A deliberate failure to report suspicions of corruption or to conceal bribes by others will also be subject to disciplinary action. BAM encourages all employees to report any corruption concerns immediately and it will support employees that do so. All reporting will be handled sensitively and BAM is committed to ensuring that no employee who reports a corruption concern in good faith suffers any detrimental effect for doing so. BAM also require its Associates to report any malpractice to it. BAM has a Reporting of Business Ethics procedure (per 09) which allows employees to make reports confidentially and anonymously.

All employees must read this policy and associated procedures - (see per-12 for further guidance) and familiarise themselves with the related BAM policies and procedures in this area. BAM will continue to monitor this policy and a range of other anti-corruption compliance measures it has put in place and continues to develop. Should any employee have questions regarding the obligations set out in this policy, they should contact their HR Manager, and Associates should, in the first instance, contact their usual BAM contact.

James Wimpenny

Chief Executive

BAM Construct UK Ltd