

Balfour Beatty expects all employees to act with integrity and to do the right thing. We do not tolerate bribery. Giving and receiving Gifts and Hospitality (“G&H”) is a risk-sensitive activity that requires careful management in order to avoid bribery risks and/or damage to our reputation. This policy is integral to that effort and applies to all employees, consultants, contractors and agency workers, including those working in joint ventures (together “employees”).

Balfour Beatty recognises that, in some circumstances, the giving and receiving of G&H can be an acceptable part of business conduct, and a means of legitimately building relationships with external stakeholders, such as customers and suppliers. However, on occasions, certain G&H could be inappropriate when the full circumstances in which it is given or received are considered.

All employees must consider the following when deciding if G&H given or received is appropriate:

- Why it is given/received;
- Who it is given to/received from and the nature of that party’s relationship with Balfour Beatty;
- The value and what it is;
- When it is given/received; and
- How often it is given/received.

The following G&H is always prohibited to protect Balfour Beatty and its employees from allegations of improper conduct, bias or bribery and corruption:

- G&H in the form of cash or (for our UK business) cash equivalents (such as vouchers);
- G&H which has been solicited (i.e. asked for);
- G&H which may influence decisions, give the impression of influencing decisions or create a potential conflict of interest;

- G&H which is lavish or extravagant, either in isolation or in combination with other G&H given to/received from the same party over a period of time;
- G&H which is illegal, distasteful, sexual in nature, inappropriate or otherwise inconsistent with Balfour Beatty’s Values; and
- G&H we give when we know the party it is given to is not permitted to receive it (for example, under their own employer’s policies).

These restrictions apply equally to G&H provided by Balfour Beatty employees and G&H given to Balfour Beatty employees.

This Policy should be read in conjunction with the Code of Ethics and any SBU/country-specific Gifts and Hospitality Policy, Procedure or Guidance Notes, which will also provide more detailed guidance on when G&H must be approved (and by whom) and entered on our [G&H Register](#).

Failure to comply with this policy may result in disciplinary and legal action being taken wherever appropriate.

We will bring this policy to the attention of our employees and relevant interested parties; and review it on an annual basis.

AUTHORISATION

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GROUP GENERAL COUNSEL & COMPANY SECRETARY

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