

Business Ethics Policy

Principle

The AMEY CODE sets out Amey's commitment to conducting its business responsibly and with integrity, in full compliance with laws, recognising its impact on the environment and the need to ensure sustainable development.

It recognises that it is essential to build and retain effective relationships with its customers, employees, shareholders, business partners and the wider community while respecting the environment to ensure its sustainable development.

Amey will compete for business through the quality and value of its services in an open, transparent and compliant manner, and through a sound reputation as a professional, well-managed, ethical and socially responsible company. Amey recognises that this is particularly important in circumstances where it is entrusted to manage the assets and systems of other organisations.

Amey will make clear its approach to specific ethical issues through the communication and enforcement of individual policies and related procedures, although it accepts that ethical behaviour cannot be expressed or ensured by the written word alone.

Amey does NOT permit or condone any acts of fraud, corruption, bribery or deception in any of its dealings or in the dealings of its Employees, joint venture partners, suppliers or agents acting on its behalf. Amey operates in full compliance with laws in all its operating jurisdictions.

In particular, throughout our business and in all our activities, we will:

- Develop a culture where responsible and ethical behaviour is seen as an essential and integral part of our day-to-day activity.
- Maintain and demand high professional standards, honour our commitments, and act consistently with integrity, care and diligence.
- Communicate in an open and honest manner, while fully recognising the confidentiality and sensitivity of some information in our possession.
- Build and protect the trust and confidence of all those who work with us, by listening to and respecting their reasonable convictions and interests. Respect the values, traditions and cultures of individuals.
- Demand honesty and require everyone to avoid conflicts of interest and, where they do occur, to openly declare them. Provide advice, practical help and a learning environment to support individuals in reaching appropriate decisions; our managers will lead by example. Insist that privileged information is not used for personal gain.
- Make clear our procedures for disciplining those who do not adhere to our clearly expressed standards, policies and procedures, or who break the law; we shall also support those who seek to uphold such standards or who expose the deliberate wrong-doing of others, and will establish clear procedures for this.
- Use reward and recognition systems to encourage and reinforce appropriate behaviour.
- Practice equality, avoiding discrimination, undue pressure, bullying or harassment.
- Observe legal and regulatory requirements, including those for corporate governance.
- Seek to provide a safe and healthy working environment for all our people, and for the communities in which we operate.
- Give high priority to the development and use of materials, products, processes and services, which reduce environmental damage and waste.

- Be a good corporate citizen, taking account of local and national issues in serving the communities in which we operate.
- Avoid doing business with organisations, which are seen to be in fundamental conflict with our own ethical principles.

Coverage

This policy applies to all Employees - individuals working at all levels and grades, including (but not limited to) senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff, volunteers, interns, agents, sponsors or any other person associated with Amey (collectively referred to as “Employees” in this policy).

This policy also applies to Amey’s its joint venture partners, advisers and agents and all suppliers used by Amey.

This policy is applicable to all jurisdictions in the world where Amey operates.

Your Responsibilities

People managers are responsible for implementing this policy.

The prevention, detection and reporting of unethical conduct or conduct in breach of this policy, The Amey Code or any other Amey policy or procedure or law **MUST** be reported to one’s people manager, other senior Amey manager, the General Counsel or via the independently managed **Whistleblowing Helpline (telephone 0800 160 1797)**.

Any Employee who breaches this policy will face disciplinary action that could result in dismissal for gross misconduct. Any suppliers, agents, advisers and joint venture partners who breach this policy may (inter alia) have their contracts terminated.

Amey reserves the right to report any allegations of criminal activity to the relevant police authority for investigation and, if appropriate, prosecution.

Implementation

The General Counsel is responsible for the development of this policy together with other stakeholders, including, but not limited to, the ESG Director, Director of Corporate Compliance and Amey Executive members. The General Counsel is also responsible for implementing, maintaining and reviewing this policy, and for clarifying and resolving general issues. The General Counsel will oversee any audit of policy compliance, which may be considered necessary.

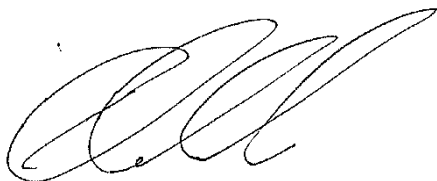
Line management is responsible for implementation of this policy and other related policies and procedures, including communication and detailed interpretation, monitoring and any disciplinary action in response to an apparent breach of policy.

The policy will be communicated at regular intervals, using a range of appropriate. The policy will also be communicated to other stakeholders, including customers, suppliers and business partners, as opportunity or the need arise.

This policy should be read in conjunction with :-

- The Amey Code
- The ESG Policy

- Anti-Corruption Policy
- Anti-Fraud Policy
- Whistleblowing Policy



Andrew Milner

Chief Executive

October 2025

Business Ethics Policy - Defence Services Annex

This Annex forms part of, and should be read in conjunction with, the Amey Code and the Business Ethics Policy. It sets out the scope of Amey's service delivery within the defence sector.

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The defence sector is a core part of the economy of the United Kingdom, providing jobs for thousands of people and providing products and services that are essential for the safety and security of the United Kingdom.

As a Tier - 1 provider of services to the Government of the United Kingdom, Amey is committed to supporting the Ministry of Defence (MoD) through the provision of sustainable and ethical infrastructure and facilities services.

As a signatory to the UN Global Compact and the UN Sustainable Development Goals and in compliance with its broader environmental, social and governance (ESG) goals, Amey carefully and regularly considers the scope and extent of its service provision in this sector.

Scope of Amey Defence infrastructure services

Amey considers that the provision of the following services within the defence sector to be permissible and to be in compliance with its ethical obligations as set out in the Amey Code, its Business Ethics Policy and in compliance with its other external commitments:-

- the maintenance and provision of infrastructure and built estate facilities management services across the United Kingdom military built estate including, inter alia, offices, training areas accommodation facilities, vehicles repair and storage facilities;
- the provision, maintenance, repair (and associated services) of non-lethal construction plant and vehicles and other construction related plant and equipment including, inter alia, materials handling equipment and other associated plant;
- in respect of all of the above, such ancillary surveillance, communications and cyber-security services;

All such services to be delivered and equipment to be procured, maintained, repaired and stored for the Ministry of Defence and NATO (including NATO members).

Amey will not undertake:-

- the procurement, supply, maintenance, delivery or storage of weapons, weapon systems or essential components at any part of their manufacture or the provision of any services relating to such weapons, weapons systems or components of any type whatsoever;
- the procurement, supply, maintenance, delivery or storage of munitions or essential components of any munitions components or the provision of any services relating to munitions or their components of any type whatsoever;
- the deployment of Amey personnel into active war zones.

In support a 'Whole Force Approach', Amey works for and alongside regular, reserve and MoD teams to deliver its services. All Employees and sub-contractors to Amey must adhere to Amey policies, standards and procedures.

Armed Forces Covenant

Amey is committed to supporting the armed forces and is a signatory of the Armed Forces Covenant, with a focus on supporting service leavers, spouses and families and Reservists.

Amey support both Regular Reserves, Reservists and Sponsored Reserves. Sponsored Reserves refer to those employees working for companies that are contracted to deliver support services to the MoD. Training and operational deployment of all reserves are fully under military command and control.

Monitoring and Review

This Annex shall be reviewed on at least an annual basis as part of the annual review of the Business Ethics Policy.

All other aspects of the Business Ethics Policy shall apply to this Annex as though incorporated herein, with the necessary amendments.

END

Revision status

REVISION	DATE	AMENDMENT	CONTENT OWNER	EXEC SPONSOR
6.1	Jan 2014	New document reference and template only	W Robertson	M. Ewell
06	Nov 2006	Changes made to Pg 3 Responsibilities Sentence 1: Company Secretary to General Counsel. Sentence 3: Sponsor to Chief Executive	C. Hui	M. Ewell
05	Oct. 2005	Annual Review – No changes	C. Hui	M. Ewell
02-04	July 2001 Oct. 2004	Documents held on old EDM Server	C. Hui	M. Ewell
01	Sept. 2000	Issued for Use / On old EDM Server	Company Secretary	CEO
6.2	29/11/2017	Annual review. Removal of CEO signature	Jayne Bowie	Andy Milner
7	30/06/2020	Policy Review	Jayne Bowie	Amanda Fisher
8	24/01/2023	Updated to reflect change of Chief Executive	Jayne Bowie	Andrew Nelson
9.	01/08/2023	Updated to reflect new company branding	Jayne Bowie	Andrew Nelson
10.	31/07/2025	Inclusion of Defence Services Annex	Paolo Steffenini	Andrew Milner
11.	28/10/2025	Annual review and consequential updates	Paolo Steffenini	Jayne Bowie