

# Anti-Corruption Policy

## Principle

Amey believes that conducting its business honestly and to high ethical standards, thereby maintaining public confidence in the integrity and corporate legitimacy of its operations, is essential for its long-term success and growth. Amey also believes that it is essential to conduct its operations in full compliance with the law and to ensure that its business dealings with Employees, business partners, suppliers and customers are conducted professionally, fairly and with integrity in a corruption-free environment.

Amey does **NOT** permit or condone any acts of corruption and bribery, in any of its dealings or in the dealings of its Employees, joint venture partners, suppliers or agents acting on its behalf.

The purpose of this policy is to:

1. Set out Amey's responsibilities (including the responsibilities of its Employees, suppliers, joint venture partners and agents) in observing and upholding its position on bribery and corruption;
2. Set out the measures to be taken to:-
  - Prevent corruption and bribery by having adequate anti-corruption procedures;
  - To monitor and identify any instances of corruption and bribery or attempted corruption and bribery;
  - To respond appropriately if corruption and bribery is uncovered; and
3. Provide information and guidance to those working for and with Amey on how to recognise and deal with bribery and corruption.

This policy is to be read in conjunction with the Amey Code and the other policies listed below.

**Amey operates a ZERO-Tolerance approach to any breach of this policy.**

## Prohibited Acts

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage and includes (inter alia):-

- Offering a bribe (even if the offer is rejected);
- Receiving a bribe (including offering to receive a bribe)
- Bribing a public official.

Bribery is illegal in the UK and acts of bribery are prohibited irrespective if they take place in the UK or elsewhere in the world. Bribery is illegal in all the areas in the world where Amey or its subsidiary company operate.

Corruption is the misuse of a position of power for personal gain.

## 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 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 bribery and other forms of corruption are the responsibility of all those working for Amey. All Employees, suppliers, joint venture partners, advisers and agents are required to comply fully with this policy and to report all instances of alleged bribery.

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 bribery and corruption to the relevant police authority for investigation and, if appropriate, prosecution.

## Reporting

Amey encourages the early reporting of concerns or suspicions of behaviour that may be in breach of this policy. Concerns should be raised with a people manager (if appropriate) or by following the procedure set out in the Whistleblowing Policy.

**SILENCE IS CONSENT.**

## Communication and Training

The policy will be communicated at regular intervals, using a range of appropriate media and providing opportunities for questions and concerns to be fully addressed. The policy will also be communicated to other stakeholders, including customers, suppliers and business partners, as opportunity or the need arise.

Regular training to all Employees will be conducted through the Compliance Training Programme. Appropriate measures will be put in place and monitored for joint venture partners, advisers and agents and all suppliers used by Amey.

## Anti-Corruption & Fraud Steering Group

A steering group shall be established under the chairmanship of the Director of Corporate Compliance to review compliance this and related policies across all business divisions and group functions, and in all jurisdictions where Amey operates. The steering group shall ensure that best practise is shared, and that support and operational procedures are in place, maintained and audited in the business divisions and group functions.

The steering group shall report into the Chief Executive Officer and through him to the Board on at least an annual basis. The steering group shall also update the Audit Committee at least annually.

## Implementation

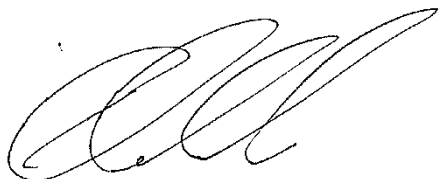
The General Counsel is responsible for the implementation of this policy and other related policies and procedures, including the communication and detailed interpretation, monitoring, review and updating, training requirements and any disciplinary action in response to an apparent breach of this policy. The Director of Corporate Compliance shall be responsible for the day to day implementation and monitoring of the policy on behalf of the General Counsel.

Line management is responsible for implementation of this policy.

This policy should be read in conjunction with a number of other Amey policies on related matters, including but not limited to:-

- The Amey Code
- Anti-Fraud Policy
- Gifts and Hospitality Policy

- Recruitment and Selection Policy
- Disciplinary Policy
- Whistleblowing Policy

A handwritten signature in black ink, appearing to be 'AM', with a stylized flourish extending from the end.

**Andrew Milner**

Chief Executive

September 2025

## Revision status

REVISION	DATE	AMENDMENT	CONTENT OWNER	EXEC SPONSOR
1.0	June 2011	New policy	W Robertson	M Ewell
1.1	June 2012	Updated policy references in footer	W Robertson	M Ewell
1.2	Jan 2014	New document reference and format only	W Robertson	M Ewell
1.3	June 2020	Updated policy and references	J Bowie	A Fisher
1.4	January 2023	Updated to reflect change of Chief Executive	J Bowie	A Milner
1.5	August 2023	Updated to reflect new company branding	J Bowie	A Milner
1.6	September 2025	Annual review and consequential updates	P Steffenini	J Bowie