

Gifts and Hospitality Policy

Principle

Amey believes that conducting its business 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 a transparent manner, in full compliance with the law and to ensure that its employees, business partners, suppliers and customers operate in a corruption-free environment.

Gifts from suppliers, customers or partners may give an appearance of dishonest or unfair dealings. Amey does not permit or condone acts which amount to bribery or which attempt to illegally influence another person's or your own behaviour.

This policy does not prohibit providing or receiving gifts and hospitality as long as such gifts and hospitality are provided and received in compliance with this policy.

Within this policy the term 'Gifts and Hospitality' includes tangible and intangible gifts of any kind including (but not exclusively): payment, services, accommodation, invitations to restaurants, tickets, events, travel expenses, discounts for personal purchases or any other kind of gift or favour.

This policy is to be read in conjunction with the Amey Code.

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

Coverage

This policy applies to all 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.

The policy also applies to the employees of any entity where Amey has control, being any entity where Amey has a majority vote on the Board of Directors or other administrative body as applicable.

All employees are also subject to industry standards and the laws of the countries in which they work. Any such industry standard or local law that is more stringent will take precedence over the provisions herein.

Your Responsibilities

It is the responsibility of each employee to read, understand and comply with this policy and to ensure that their close relatives do not solicit gifts or hospitality from clients, suppliers or partners. Ignorance of this policy does not excuse non-compliance.

Any person 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, among others, have their contracts terminated.

Amey reserves the right to report any breaches of this policy which may amount to bribery and corruption to the relevant police authority for investigation and, if appropriate, prosecution.

Amey encourages the early reporting of concerns or suspicions of behaviour that may be in breach of this policy. Concerns should be raised with your people manager (if appropriate) or by reporting it to the Whistleblowing Helpline (0800 160 1797).

People managers are required to ensure compliance with the policy and to monitor and review the activities of their reports. Any suspicious activity must be reported to a senior manager (if appropriate) or by following the procedure set out in the Whistleblowing Policy.

Prohibited Gifts and Hospitality

It is NOT acceptable to:-

- a) give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- b) give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- c) solicit or accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- d) solicit or accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by Amey in return;
- e) give, promise to give, or offer, a payment, gift or hospitality or accept a gift or hospitality from another party during a procurement process where that other party is involved in any way in that procurement process, unless the relevant Business Unit Managing Director or Group Function Head has given their prior approval to such gift or hospitality;
- f) threaten or retaliate against another worker who has refused to be complicit in activities in breach of this policy; or
- g) engage in any activity that might lead to a breach of this policy.

When an employee maintains a personal relationship with customers, suppliers or vendors of Amey, he/she may not obtain discounts or more favourable conditions for himself/herself, spouse, unmarried partner or relative in respect of any purchase or service provided, than those offered to.

Acceptable Gifts and Hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. The giving or receipt of gifts and hospitality is not prohibited if in all the circumstances, the gift or hospitality given or received is reasonable and justified and, if the following requirements are all met:

- a) it is not made or accepted with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- b) it complies with local law;
- c) it is given or received in the name of and on behalf of Amey;
- d) it is for an identifiable and legitimate business purpose;
- e) it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- f) it is appropriate in the circumstances;
- g) taking into account the reason for the gift or hospitality, it is of an appropriate type and value and given or received at an appropriate time;
- h) it is given or received openly, not secretly; and
- i) it does not expose Amey to civil or criminal liability.

If there is any doubt as to the appropriateness of a gift or hospitality, employees should consult their people manager and Amey's General Counsel in writing, who will respond also in writing.

Approval

Offering gifts or hospitality:

All gifts and hospitality expenses must be approved according to the Expenses Policy/procedure applicable to the employee. Also, when the expense exceeds the value of £50 per person the employee shall seek written permission (which may be by e-mail) from his/her people manager, prior to the expense being incurred. The employee may seek approval of values less than that above if they wish. Any request for approval shall contain the amount and circumstance of the expenditure to be incurred. Any subsequent approval shall also be in writing (which may be by e-mail). All expenditure will also

require any additional approval required by the Travel and Expenses Policy and the General Authorities Schedule. Under no circumstances will any approved value be exceeded.

Being offered gifts or hospitality:

All gifts and hospitality offered to you must be declared to your people manager and / or if the value, or estimated value, exceeds £50 then approval to receiving the gift or hospitality must be obtained.

Please complete this form for both of the above approvals / declarations.

Communication and Training

This policy is published within AmeyWorld and is reviewed periodically. It is communicated at 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 arises.

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
- Disciplinary Policy
- Whistleblowing Policy and Procedure



Andrew Milner

Chief Executive Officer

July 2023

Revision status

REVISION	DATE	AMENDMENT	CONTENT OWNER	MANDATED BY
1.0	June 11	Consolidated policy	W Robertson	M Ewell
1.1	June 12	Updated reference numbers in footer	W Robertson	M Ewell
1.2	Jan 2014	Updated ref and document template only	W Robertson	M Ewell
1.3	Mar 2017	Updated to dovetail with revised Ferrovial Gifts and Hospitality Procedure and to reflect change of Chief Executive	W Robertson	A Milner
1.4	Sept 2020	Updated following approval by the Executive Committee to revised threshold for approval (£50)	J Bowie	A Fisher
1.5	Sept 2021	Annual review and update	J Bowie	A Fisher
1.6	January 2023	Updated to reflect change of Chief Executive	J Bowie	A Milner
1.7	August 2023	Updated to reflect new company branding	J Bowie	A Milner