

**Zero Tolerance to bribery, fraud and other corrupt practices****Our Policy**

Balfour Beatty VINCI (BBV) are delivering more than a world-class, high-speed railway; we are working with HS2 to create a catalyst for growth across Britain.

Together we work to ensure that HS2 is an exemplar project and we are beyond reproach in our actions. We must act in an honest, fair and transparent way in everything we do. This includes avoiding incidents of bribery, fraud and other corrupt practices.

More generally, we recognise that the construction industry ranks high in corruption indices worldwide and is known to be particularly vulnerable to such misconduct, even in the UK. We all have a responsibility to help change our industry and perceptions of it for the better.

For BBV this policy will always be a critical priority. It is particularly important as our client HS2 is an executive non-departmental public body sponsored by the Department for Transport and we are all accountable for the proper use of public money.

This policy underpins the actions expected of all colleagues and suppliers working on Area North, to ensure that measures against bribery, fraud and other corrupt practices remain at the forefront of BBV's compliance and prevention efforts.

**Our Commitment**

We are committed to conducting business in an honest and ethical manner to maintain professionalism by acting fairly and with integrity in all business dealings and relationships.

**Our Approach**

BBV have a zero-tolerance approach to bribery, fraud and other corrupt practices. We will put in place processes to mitigate such risks and develop a culture in which such practices will not be tolerated.

We do not, and will not, pay bribes or offer improper inducements to anyone for any purpose. Nor do we or will we, accept bribes or improper inducements or tolerate such practices in our supply chain.

We will not tolerate fraud.

Any such corrupt practices suspected or identified will be investigated properly and dealt with firmly and appropriately.

***What is bribery, fraud and corruption***

A bribe is a financial or other advantage, promised, requested or given to induce a person to perform a function or activity improperly or to reward them for doing so.

In practical terms, a financial or other advantage is likely to include cash or cash equivalent, gifts, meals, entertainment, services, loans, preferential treatment, discounts or anything else of value.

The timing of the bribe is irrelevant. Payments made after the relevant event will still be unlawful, as will bribes that are given or received unknowingly.

Fraud includes the main offences under the Fraud Act 2006.

These include false representation, failure to disclose and abuse of position.

Corruption is the misuse of power for private gain.

**Responsibilities**

We all have a responsibility to remain vigilant to the risk of bribery, fraud or other corrupt practices.

Colleagues and suppliers must comply with the BBV Code of Conduct and all related BBV policies on IPT Area North, including:

- Gifts and hospitality
- Fraud prevention
- Conflicts of interest

Colleagues must in addition ensure that they remain compliant with their employing company's equivalent policies and codes of conduct and ethics.

Any suspicions or allegations of bribery, fraud or other corrupt practices can in the first instance be reported to line managers or can be raised in confidence on the BBV Speak Up platform or directly to our Compliance Team or Finance & Systems Director.

BBV's Managing Director is accountable for establishing this policy and, with the support of the BBV Executive Team and senior leadership, is responsible for monitoring colleagues' performance in complying with anti-bribery, fraud and corruption policies, procedures and laws.

It is the responsibility of every individual working on IPT Area North to comply with this policy, the processes and procedures and report any suspicious activity or financial transactions and uphold anti-bribery and corruption laws.

There are serious and profound consequences for individual colleagues, supply chain partners, statutory directors and the corporate entities comprising the Balfour Beatty Vinci Joint Venture if this policy is not complied with.

The Finance & Systems Director is the executive owner of this policy and is responsible for maintaining the accuracy and relevance of this policy and for periodic review and update to reflect changing circumstances.

**AUTHORISATION**

Nigel Russell  
Chief Executive Officer  
Balfour Beatty VINCI JV  
Expires 31 January 2025

**Speak Up Platform contact details**

**Call: 0808 189 1053**

**Website: [www.BBVAreaNorthspeakup.com](http://www.BBVAreaNorthspeakup.com)**

**Email: [compliance@balfourbeattyvinci.com](mailto:compliance@balfourbeattyvinci.com)**