

Balfour Beatty

U.S. Business Partner Standards

CODE *of*
ETHICS



What we expect of our supply chain partners

Balfour Beatty works hard to conduct business in a way that respects all those who work with and for us and the environment around us. We treat our business partners as an extension of our own business, sourcing our goods and services from partners who are aligned with and adhere to our Values (see page 5 of our [Code of Ethics](#).) and standards. By business partners we mean anyone working with us or on our behalf including joint venture and alliance partners, customers, subcontractors, consultants, agents, representatives, and all suppliers of goods and services.

This document draws out the key elements of our Code of Ethics to help you, our business partners, understand the standards and behaviors we expect of you, and how you can help us leave a positive legacy. It should be used in conjunction with the full [Code of Ethics](#), a set of overarching principles which sets out the expectations we have of all those who work with and for us.

Our Principles

1	We Make Safety Personal	Nothing is more important than the health, safety and wellbeing of everyone who works with and for us. We expect others we work with, our business partners and their supply chain to stick to our health, safety and wellbeing requirements and to follow the Golden Rules .
2	Inclusion and the Right to Respect	We value each other and believe everyone should be treated with dignity and respect. Discrimination, bullying, intimidation, harassment or micro-aggressions of any kind are not acceptable in our workplaces.
3	Human rights and sanctions	We recognize that people have the right to choose whether to belong to a union and to seek to bargain collectively. We comply with international sanctions, export controls and other trade restrictions.
4	Sustainability	We seek to minimize our impact on the environment, be efficient with the resources we use and improve the prosperity and wellbeing of individuals and communities. We encourage all business partners, where appropriate, to align their operations and behaviors to the same principles and to help us deliver the ambitions set out in our Sustainability Strategy, Building New Futures .
5	Working with others	We select our business partners in a fair way, based on skill, competence and best value and commit to paying our supply chain in line with mutually agreed contractual obligations.
6	Fraud, deception and dishonesty	We will not defraud or deceive anyone, act dishonestly or misuse Balfour Beatty property or resources or facilitate tax evasion.
7	False claims	We will not claim for something we are not entitled to and keep true and accurate records of all financial transactions, recording them in a timely manner in our financial records.
8	Data privacy	We respect everyone's privacy by complying with all data protection laws and will not tolerate individual's information being mishandled. We expect business partners handling confidential and personal data to have appropriate controls to meet our information security and data privacy requirements.
9	Bribery and corruption	We will not give or receive bribes or participate in corruption.
10	Gifts and hospitality	We make sure gifts and hospitality are reasonable and don't improperly influence a decision.
11	Open and fair competition	We compete ethically and lawfully in all our activities and do not share confidential information which may impact how we operate. We do not obtain or use information about business partners which has been obtained by illegal or disreputable means.

Raising a concern

We are committed to making it safe and easy for those working with and for us to voice concerns, and to embed a culture where everyone feels confident raising those concerns without fear of reprisal. There are a number of ways we encourage those who work with us to raise their concerns that something may not be consistent with our Code of Ethics. Generally you should first discuss the matter with senior management within your organization, who in turn should feel confident to raise it with Balfour Beatty senior management.

If you believe the matter cannot be handled appropriately in this way, you can email ethics@balfourbeattyus.com; or if you prefer to remain anonymous, you can contact our **Speak Up helpline, on 1-866-840-3940 (US),** or www.balfourbeattyspeakup.com.





Think before you print!

You can find our Code of Ethics Business Partner Standards online at <https://balfourbeattyus.com/code-of-ethics>

Registered Head Offices:

5 Churchill Place
Canary Wharf
London
E14 5HU

Balfour Beatty - US Buildings & Civils
3100 McKinnon Street, 6th Floor
Dallas, TX 75201

Balfour Beatty Investments - US
1 Country View Road
Malvern, PA 19355

www.balfourbeatty.com/codeofethics

