



Anti-Fraud Policy

Principle

Amey is committed to the prevention of fraud and the promotion of an anti-fraud culture. The Company recognises that corrupt business practices can seriously undermine its reputation and shareholder value and pose a serious risk to the longer-term sustainability of its business.

The Company has a zero-tolerance approach to fraud and requires all employees to act honestly and with integrity at all times and to report all reasonable suspicions of fraud.

Amey will investigate all instances of actual, attempted and suspected fraud committed by employees or third parties providing services to Amey and will seek to recover funds and assets lost through fraud. Perpetrators will be subject to disciplinary and/or legal action and may be reported to the police.

This policy is endorsed and supported by Amey's Board of Directors.

Approach

The Company seeks to limit its exposure to fraudulent practices through:

- Setting out a clear anti-fraud policy
- Ensuring that employees are aware of actions that may constitute fraud
- Encouraging employees to be vigilant and to report any suspicions of fraud, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
- Rigorously investigating instances of alleged fraud and assisting the police and other appropriate authorities in any resultant prosecution
- Taking firm and vigorous action against any party involved in fraud.

Definitions

The term "fraud" is commonly used to describe a number of activities but essentially it is the use of deception or dishonesty to deprive, disadvantage, cause loss to a person or party or create advantage or benefit to another. This can include theft, the misuse of funds or other resources or more complicated crimes such as false accounting and the supply of false information. Some examples of fraud are:-



- Stealing cash (or failing to properly report it to the Company where required to do so), or property (such as small tools, scrap material or office supplies)
- Falsifying, concealing or destroying records or documents such as time-sheets, inspection records, delivery receipts, etc.
- Receiving personal payments or other benefits from suppliers or other parties
- Misuse of company Pcards, fuel cards or procurement facilities
- Disclosing confidential or proprietary information to outside parties
- Making a false, misleading or deceptive representation, report, account or document including false reporting and false accounting
- Tax evasion or facilitation of tax evasion
- Allowing Amey employees, assets and systems to be used in order to defraud Amey or other parties (including clients, suppliers and subcontractors)
- Failure to disclose any of the above activities.

Attempted thefts or fraud and conspiring with others to commit such acts are treated in the same way as actual thefts and fraud under this policy.

This policy covers any fraud that could potentially affect Amey's operations irrespective of whether committed by:

- Employees (including full, part time and temporary employees, consultants, contractors, agency workers)
- Suppliers and sub-contractors
- Customers
- Members of the public.

If a person is in any doubt as to whether an act constitutes fraud they should seek the advice of the Managing Director of their business unit or the General Counsel.

If anyone has a suspicion that fraud has taken or is about to take place, they must report the incident via the whistleblowing procedure. Staff or managers should not attempt to investigate any allegations of fraud themselves but must refer matters to the General Counsel via the whistleblowing helpline.

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, temporary staff, volunteers, interns, agents, sponsors or any other person associated with Amey (collectively referred to as "employees" in this policy).

This policy shall also be complied with by all Amey controlled joint ventures, advisers and agents and all suppliers and sub-contractors used by Amey.



Your Responsibilities

The prevention, detection and reporting of fraud are the responsibility of all those working for Amey whether as employees, suppliers or otherwise.

Any employee who breaches this policy will face disciplinary action that could result in dismissal for gross misconduct. Any suppliers, agents, advisers and other third-party contractor who breach this policy may (inter alia) have their contracts terminated.

Amey reserves the right to report any allegations of fraud to the relevant police or other regulatory authority, and any other interested parties for investigation and, if appropriate, prosecution.

Amey may seek to recover any losses it has suffered as a result of fraud from the people or parties involved.

Reporting

The prevention, detection and reporting of fraud is the responsibility of all Amey employees and suppliers. Employees are responsible for:

- Ensuring that Amey's reputation and assets are protected against fraud
- Reporting known or suspected fraud
- Assisting in the investigation of suspected fraud

Suppliers should notify Amey when they become aware of any fraudulent or alleged fraudulent activity involving Amey and must co-operate in any investigation by Amey into such activities.

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 contacting the independent Whistleblowing Helpline.

Any concerns raised to people managers must not be investigated by them but must be passed to the General Counsel who will instruct an inspection to be carried out under the Whistleblowing Policy.

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 joint venture partners, as opportunity or the need arise.

Implementation

The Chief Executive Officer is responsible for the implementation of this policy across Amey



including the communication and detailed interpretation, monitoring and any action in response to an apparent breach of this policy.

The General Counsel is responsible for maintaining and reviewing this policy, and for clarifying and resolving general issues and reporting of investigations undertaken.

The Chief Finance Officer will ensure that appropriate internal processes are put in place to prevent fraud and will oversee any audit of policy compliance on behalf of the Chief Executive Officer, which may be considered necessary.

The Chief Executive Officer shall update the Board on at least an annual basis on compliance with this policy.

Line management is responsible for communication and implementation of this policy to employees and all other affected parties.

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-Corruption Policy
- Gifts and Hospitality Policy
- Whistleblowing Policy

A handwritten signature in black ink, appearing to read "AM", with a stylized flourish at the end.

Andrew Milner

Chief Executive

January 2023