

## ANTI-FRAUD, CORRUPTION AND BRIBERY POLICY

### 1 Introduction

- 1.1 Tideway is committed to conducting all aspects of business in an honest and ethical manner. Tideway has a zero-tolerance approach to fraud, bribery and corruption and is committed to acting professionally, fairly and with integrity in all business dealings and relationships.
- 1.2 This policy and its associated procedure have been developed to safeguard the interests of the Thames Tideway Tunnel project (the “Project”).

### 2 Application

- 2.1 This policy applies to Bazalgette Tunnel Limited and its group companies (“BTL”) and CH2M<sup>1</sup> including all employees, consultants and direct contractors of each company working on the Project (“Tideway”).
- 2.2 BTL expects that its main work contractors, framework providers, independent contractors and sub-contractors, suppliers and partners working for and on behalf of Tideway have a similar policy and procedure within their organisation to which they will comply.

### 3 Objective

- 3.1 The purpose of this policy is to emphasise Tideway’s zero-tolerance to fraud, bribery and corruption and to ensure compliance with the Fraud Act 2006 and the Bribery Act 2010. Any breach of this policy will result in a disciplinary offence and possible removal from the Project
- 3.2 Any actual, attempted or suspected frauds will be reported to the Police and/or Action Fraud.
- 3.3 Details on how this policy will be implemented and how to raise a concern can be located in the *Anti-Fraud, Corruption and Bribery Procedure*.

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<sup>1</sup> CH2M means CH2M Hill Companies Ltd and Jacobs Engineering Group Ltd

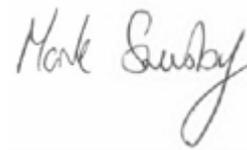
Signed:



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**Andy Mitchell**  
**Tideway**  
Chief Executive Officer  
Date: 07/06/2019

Signed:



**Mark Sneesby**  
**Tideway**  
Chief Operating Officer  
Date: 07/06/2019