



Anti-Bribery and Corruption / Ethical Policy

This arrangement applies to all employees
This is a Global arrangement
(Please note any deviations that may be applicable in your area)

1 Purpose

This document sets out the Babcock International Group Policy in relation to how business should be conducted.

2 Scope

This Policy applies to all Babcock business units, sectors and jurisdictions and is binding on all employees, directors, officers, contractors, consultants, agency workers and other persons acting on behalf of Babcock.

3 Ethical Standard

Babcock’s commitment to doing business with the highest standards of honesty and integrity requires consistently high global standards: our zero-tolerance approach towards bribery and corruption applies to all Babcock operations, regardless of local business practices, and prohibits both public and commercial bribery.

This Ethical Standard is described in the **Code of Business Conduct**.

4 The Anti-Bribery and Corruption Policy

Babcock’s reputation for honesty and integrity are our greatest assets. Corrupt or unethical behaviour can result in reputational damage and severe penalties, including fines and imprisonment.

In line with our **Code of Business Conduct** our employees

- WILL NOT take bribes and will report to appropriate management any attempt made to bribe or improperly influence them or another employee in the carrying out of their duties for Babcock;
- WILL NOT bribe or attempt to bribe anyone and will report to appropriate management any request or suggestion that Babcock, or anybody working for or with Babcock, should bribe or attempt to improperly influence someone.

5 Supporting Documentation

This policy is the top-level document in Babcock’s Anti-Bribery and Corruption governance framework. It is supported by a suite of documents that provide further detail and practical guidance on how to manage business conduct:

- **Code of Business Conduct (BAB-LG-POL-43)**
- **Anti-Bribery and Corruption Compliance Guidance (BAB-LG-GUI-68)** – A guide containing detailed background and guidance on Babcock’s approach to mitigating bribery and corruption risks when carrying out its business.
- **Gifts Hospitality Charitable Donations and Sponsorship Approval Process Guidance (BAB-LG-GUI-64)** – Guidance concerned with Anti-Bribery and Corruption approval using the Gifts and Hospitality App.
- **Babcock International Group PLC Consolidated DoA (BAB-FI-POL-74)**
- **Gifts and Hospitality App Approver Guidance (BAB-CR-GUI-92)**
- **UK Travel and Expense Policy including Guidance (UK-FI-POL-68)**

Jack Borrett	Group Company Secretary and General Counsel	30/09/2026
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