



ANTI-MONEY LAUNDERING POLICY

1 Introduction

- 1.1 This policy applies to Bazalgette Tunnel Limited, CH2M¹ (“Tideway”) and anyone working on the Thames Tideway Tunnel Project (“The Project”).
- 1.2 Money Laundering is the process by which the proceeds of crime or terrorist activity is turned into legitimate or “clean” money or other assets.
- 1.3 Tideway is committed to conducting all aspects of business in an honest and ethical manner. Tideway has a zero-tolerance approach to Money Laundering and is committed to acting professionally, fairly and with integrity in all business dealings and relationships in compliance with the law.
- 1.4 This policy and its associated procedure have been developed to safeguard the interests of the Project, Tideway employees, contractors, sub-contractors, consultants (“Project Members”); suppliers, partners, main work contractors and anyone working on the Project, regardless of employment route or parent company.

2 Objective

- 2.1 The purpose of this policy is to emphasise Tideway’s zero-tolerance to Money Laundering, with any breach of this policy resulting in a disciplinary offence and possible removal from the Project. In addition, it may lead to criminal prosecution for the individuals involved and the Company resulting in significant fines and / or imprisonment and also breach of contractual obligations.
- 2.2 This policy does not form part of any employee’s contract of employment and may be amended at any time.
- 2.3 Details on how this policy will be implemented and how to raise a concern can be located in the *Anti-Money Laundering Procedure* (2260-TDWAY-TTTUN-990-ZZ-PP-700024)

Signed:

Andy Mitchell

Signed:

Mark Sneesby

¹ CH2M means CH2M Hill Companies Ltd and Jacobs Engineering Group Ltd.

Tideway

Chief Executive Officer

Date: 27/09/2019

Tideway

Chief Operating Officer

Date: 27/09/2019