



Background

Broadspectrum Pty Ltd (**Broadspectrum** or the **Company**) is a wholly-owned subsidiary of Ferrovial S.A. (**Ferrovial**). Consistent with Ferrovial's principles of conduct and behaviour, Broadspectrum is committed to responsible corporate governance, including promoting ethical and transparent dialogue and conduct with all levels of government in countries where Broadspectrum conducts business. Accordingly, the Broadspectrum board of directors (the **Board**) and senior management have endorsed this *Political Involvement and Support Policy* to support the Broadspectrum Code of Business Conduct and compliance and governance framework.

Purpose of this Policy

The purpose of this Policy is to:

- ▶ outline Broadspectrum's position on responsible participation in the political process and legitimate dealings with governments (including government bodies), political parties and groups, elected members and candidates involved in legislation, regulation or administrative rule making (**Political Stakeholders**)
- ▶ outline responsibilities of Broadspectrum directors, officers, employees, consultants, contractors and any other parties acting as representatives or agents of Broadspectrum (**Employees** for the purpose of this Policy) in observing and upholding this Policy, and
- ▶ endorse legitimate business practices when engaging with Political Stakeholders.

Scope

This Policy applies to all Broadspectrum:

- ▶ Employees
- ▶ where applicable, Business Partners, and
- ▶ wholly and majority-owned business ventures in all countries in which Broadspectrum conducts business. Where Broadspectrum has a minority interest, it will seek to ensure that the legislative requirements and intentions underlying this Policy are complied with, but recognises that the manner in which these requirements are met may vary. References in this Policy to Broadspectrum includes its related entities.

For the purposes of this policy, **Business Partners** includes, clients, suppliers, consultants, contractors, sub-contractors, joint-venture and alliance partners, and other Representatives and third-parties performing services for, or on behalf of, Broadspectrum.



Sources of legal obligations

The legal obligations underlying this Policy are the political involvement and support laws applicable in the countries in which Broadspectrum conducts business, including:

- ▶ Commonwealth Electoral Act 1918 (Australia), as well as state-based laws, including the Election Funding and Disclosures Act 1981 (NSW) and Election Funding Regulation 2009 (NSW)
- ▶ Electoral Act 1993, Secret Commissions Act 1910 and Crimes Act (Bribery of Foreign Public Officials) New Zealand Amendment Act 2001 (New Zealand), and
- ▶ The anti-corruptions laws of countries as outlined in the *Anti-Bribery and Corruption Policy*.

To the extent that the applicable laws of a country in which Broadspectrum conducts business conflict with or impose a higher standard than this Policy, the applicable laws must be complied with.

Responsible political involvement and support

Broadspectrum is committed to engaging in constructive and transparent dialogue with Political Stakeholders to openly advocate the Company's views on public policy issues and initiatives of significance to its business ventures and to the communities in which Broadspectrum operates.

Broadspectrum aims to comply with all applicable laws and regulations governing corporate political involvement and support in countries where the Company conducts business, recognising that in some countries certain activities may be illegal. When dealing with Political Stakeholders Employees should also be guided by the *Anti-Bribery and Corruption Policy* and *Business Partners Policy*.

Participation in public policy debate

All levels of government may - at times - implement proposals and policies, and introduce or amend laws and regulations which concern Broadspectrum's business ventures. These could relate to infrastructure, energy, resources, oil and gas, health and safety, the environment, employment relations, Indigenous relations, finance and corporate governance.

It may be appropriate for Broadspectrum to participate in the debate on these issues where there is a valid commercial purpose. This participation can be in the form of formal written submissions and attendance at various functions and forums to advocate the Company's views.

Formal written submissions to Political Stakeholders can only be authorised by the:

- a) Chairman
- b) Managing Director and Chief Executive Officer
- c) Group Executive Legal and Governance, or
- d) Chief Financial Officer.

Authorised spokesperson

Employees authorised to speak publicly on behalf of Broadspectrum are the:

- ▶ Chairman
- ▶ Managing Director and Chief Executive Officer
- ▶ Chief Financial Officer
- ▶ Chief Development Officer
- ▶ General Manager Corporate and Public Affairs, and
- ▶ Executive General Manager Strategy, Markets and Investments.

All Employees must understand and comply with Broadspectrum's *Protocol and Procedures for Responding to the Media*.

Political donations

Broadspectrum does not make political donations. A political donation is a contribution to, or for the benefit of, a Political Stakeholder, which includes:

- ▶ a lump sum donation of money
- ▶ the provision of a service at no charge or at a discounted charge, including the provision of a loan
- ▶ in-kind contribution of Company facilities and equipment or Employee time, and
- ▶ payment for attendance at a function or forum held by a Political Stakeholder (including entry fees and tables purchased at political fundraising events).

No Employee or Business Partner may make a political donation, whether money or otherwise, by or on behalf of Broadspectrum to a Political Stakeholder. Employees may attend a function or forum held by a Political Stakeholder where the cost is not borne by Broadspectrum.

The provision of gifts, discounts and hospitality to Political Stakeholders, including the payment of any registrations or attendance fees or similar for functions or forums in which a Political Stakeholder may have a beneficial interest or otherwise derive a financial benefit, is addressed in the *Anti-Bribery and Corruption Policy*.

Employee's personal political involvement

Broadspectrum respects the right of its Employees to engage in the political process in their personal capacity (including making political donations), provided that Employees must ensure that their involvement is not perceived to represent Broadspectrum's views, and Employees must not allow reference to be made to their affiliation with Broadspectrum in any materials, publications or pronouncements made as part of such engagement or involvement. Use of Broadspectrum's resources, including Employees' time at work, Company vehicles and stationery for such an engagement or involvement is not permitted.



At times, an Employee may be working on a Broadspectrum planning or project application being considered by Government and subject to legislation which requires disclosure of political donations, without distinguishing political donations made in a personal capacity. If Employees have made any donations to which such legislation applies, they must consult with the Group Executive Legal and Governance to ensure appropriate disclosures are made to assist with minimising the risk of a penalty or fine being imposed upon Broadspectrum.

Employees interested in serving in an elected or appointed government position should consult with the Group Executive, Legal and Governance.

Broadspectrum *Equality and Diversity in the Workplace Policy* highlights that the Company provides equal employment opportunities without regard to political belief, amongst other individual attributes. Employees must not harass, use or threaten force or reprisal against any Employee for supporting or opposing any political party or candidate or government initiative in their personal capacity.

Maintaining business records

In accordance with the Broadspectrum *Code of Business Conduct*, Employees must keep complete and accurate business records (including financial, human resources, payroll and environmental records), and not create false, misleading or artificial entries to conceal an unauthorised payment to a Political Stakeholder. All applicable controls and approval procedures must be followed.

Training and communication

Broadspectrum regularly communicates this Policy to Employees established communication channels. Employees will also receive regular training on supporting this Policy in the context of their employment with Broadspectrum.

Consequence for breach of this Policy

Breaches of laws prohibiting certain corporate political donations are serious offences under local and international laws. Breach of this Policy by Employees:

- ▶ could expose the Company and individuals to criminal (a fine or imprisonment or both) and civil liability (a financial penalty and liability for damages)
- ▶ could expose the Company to significant reputation damage, and
- ▶ will be regarded by Broadspectrum as serious misconduct which may lead to disciplinary action, including termination of employment or contract.



Review of this Policy

The Group Executive Legal and Governance is responsible for keeping this Policy up to date, a formal review will take place every two years, and the Board is responsible for approving this Policy.

Related documents

This Policy should be read in conjunction with Broadspectrum's other documents including:

- ▶ *Code of Business Conduct*
- ▶ *Conflicts of Interest Policy*
- ▶ *Anti-Bribery and Corruption Policy*
- ▶ *Business Partners Policy*
- ▶ *Social Media Policy, and*
- ▶ *Equality and Diversity in the Workplace Policy.*