New facilities for Yeoman Park Academy, Mansfield, United Kingdom

06

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6.1 Approach to sustainability reporting

In this section we disclose BAM's sustainability statement in accordance with European Sustainability Reporting Standards (ESRS), as adopted by the European Union. Central to the approach is the Double Materiality Assessment, which identifies material impacts, risks and opportunities connected with BAM's own operations and direct and indirect business relationships in the upstream and/or downstream value chain.

BAM considers sustainability to be a prime driver for the company's future business and its ability to create long-term value. BAM aims to be a leader in the industry to create a socially and environmentally sustainable environment. Progress is measured continuously, through which BAM is encouraged to deliver sustainable solutions and actively engage with stakeholders to accelerate the sustainability goals.

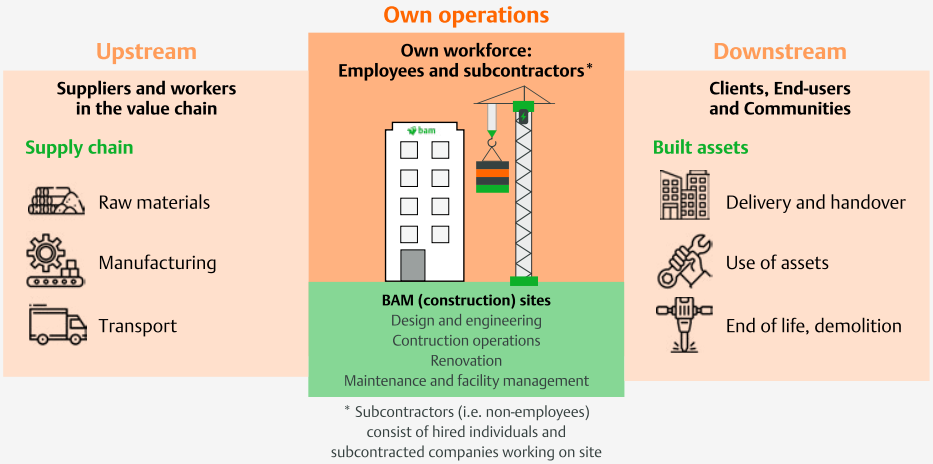
BAM consistently fosters communication and dialogue with both internal and external stakeholders to learn about the perspectives and concerns of those parties impacted by the company's activities and how they in turn can impact BAM. Such interactions not only expand BAM's knowledge base, but also enhance its capacity for sound decision-making and the effective prioritisation of actions.

BAM determined which sustainability-related impacts, risks and opportunities were material to stakeholders and the company. The topics identified through the double materiality assessment are used for strategic direction and control on material sustainability matters. The response to material sustainability impacts, risks and opportunities is fully integrated into BAM's organisational processes. The material impacts, risks and opportunities are subsequently used to determine the scope of BAM's sustainability reporting. The implementation of the double materiality approach and related sustainability reporting is not intended as a compliance exercise but to drive strategic embedding of sustainability in BAM's activities, aiming to achieve sustainable change and a resilient company.

BAM's value chain

Sustainability is a key driver in BAM's business model and strategic decision making. In executing the strategy and driving the sustainability targets, the company continues to support and encourage clients and the supply chain to accelerate their sustainability goals. BAM works with value chain partners and other stakeholders to fully leverage its contribution to the planet and people themes.

BAM's value chain spans activities that turn client needs into built assets while minimising environmental and social impacts. Upstream, business development, design and procurement drive value through planning and the selection of sustainable materials, equipment and partners. Core construction activities - including site preparation, engineering, project management and quality controls - deliver value by practising safety, resource efficiency, waste reduction and technical performance. Downstream functions such as commissioning, handover and maintenance services reinforce long-term performance and contribute to the lifecycle sustainability of the asset.



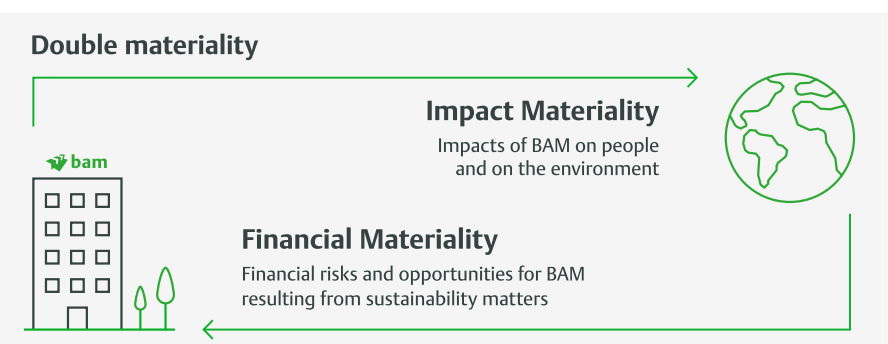
* Subcontractors (i.e. non-employees) consist of hired individuals and subcontracted companies working on site

Double Materiality Assessment

In 2025, the company updated its Double Materiality Assessment (DMA) in line with the European Sustainability Reporting Standards (ESRS), building on the comprehensive assessment conducted in 2023 and the update in 2024 as the foundation for this review. ESRS 2 defines the frequency of sustainability reporting under the ESRS as annual, given that the sustainability statement is part of the BAM's management report. Accordingly, BAM's continuous risk processes are aimed at monitoring and updating its material impacts, risks and opportunities, and material information to be included in the sustainability statement. The process followed four key phases: identification, assessment, processing of results, and validation. This structured approach ensured that material sustainability impacts, risks and opportunities were reviewed comprehensively and updated where necessary.

Following this process, BAM concluded the updated list of material impacts, risks and opportunities as of the reporting date. Compared to the previous reporting year, the following changes have been made: the positive impact of ecosystem services, the opportunity related to energy efficiency, and the climate-risk impact on the land bank are no longer considered material. In contrast, the Dutch nitrogen crisis has been classified as material risk impact, and the energy transition has been classified as a material opportunity.

The Executive Committee and Supervisory Board validated the approach and outcomes, supported by their respective committees.



The tables in this paragraph show BAM's material sustainability impacts, risks and opportunities. The methodology and underlying assumptions of the double materiality assessment are included in the grey box on the next page.

Double materiality has two dimensions: impact materiality and financial materiality. Thus, the methodology used for this assessment is based on two processes. The first process involves the identification, assessment and prioritisation of actual and potential impact made by BAM on people and the environment. The second process focuses on the identification, assessment and prioritisation of financial risks and opportunities for BAM associated with Environment, Social and Governance (ESG) topics. Following the methodology of double materiality assessment, BAM actively solicited input and feedback from internal and external stakeholders to gain a comprehensive understanding of the most pressing concerns to stakeholders. This approach helps to establish evidence of actual or potential impact on both people and the environment associated with the company's activities, particularly from the perspective of stakeholders who may be directly impacted.

Reporting principles and assumptions

Scope

The double materiality assessment encompasses all the activities of BAM. This extends to BAM's upstream activities, own operations and downstream activities, covering all associated geographical regions.

Impact Materiality

A sustainability impact, risk or opportunity is material from an impact perspective when it pertains to BAM's actual or potential, positive or negative material impact on people or the environment over short-, medium- and long-term time horizons.

BAM determined a quantitative threshold, which was also made qualitative to support internal dialogue sessions. The materiality of an impact is based on the scale and scope of the impact, the irremediable character (in case of negative impacts) and the likelihood of impact to occur. An impact is material if it is scored 'critical' or 'high'. The impact is not material if it is scored 'medium', 'low' or 'negligible'.

Financial Materiality

A sustainability-related risk or opportunity is material from a financial perspective if it triggers or may trigger material financial risks or opportunities for BAM. This is the case when it generates or may generate risks or opportunities that have a material effect (or are likely to have a material effect) on BAM's cash flows, performance, position, cost of capital or access to finance in short-, medium- and long-term time horizons.

The materiality of a financial risk or opportunity is based on the magnitude of the effect and likelihood of the risk or opportunity to occur. BAM determined a quantitative threshold, which was also made qualitative to support internal dialogue sessions. A financial risk or opportunity is material if it is scored 'critical' or 'high'. The financial risk or opportunity is not material it is scored 'medium', 'low' or 'negligible'.

Thresholds positive and negative impact materiality

BAM has set a lower threshold for negative sustainability impacts. The company aims to protect itself from risks, align with stakeholder expectations and ensure long-term success. While positive impacts are valuable, the costs and consequences of negative sustainability outcomes can be far more severe and harder to reverse, warranting stricter thresholds.

Gross (inherent) or residual risks and opportunities

BAM identifies material impacts excluding the consideration of any mitigating measures. Compliant with ESRS, BAM discloses gross impacts and the (potential) actions taken to mitigate the negative impacts. BAM identifies gross material financial risks and opportunities. In specific circumstances, BAM considers mitigating activities in determining the financial effects for the company. Risk mitigating activities could change the expectation of the effect of the risk on the company, or change the extent to which the company's financial position is affected. Therefore, risk mitigation activities could affect the expectation of whether and how a sustainability-related risk might affect BAM's financial position. A description of the mitigating measures considered in BAM's risk assessment is below:

- Clients will be paying a premium for certain services or covering higher costs levels in the industry, for example due to carbon pricing consequences in BAM's supply chain.
- As is common industry practice, BAM insures its construction projects against material damage caused by extreme weather.

Interactions with stakeholders

In 2025, the double materiality assessment update has been reviewed by the Risk and Control committee, Executive Committee and Supervisory Committees (Audit committee and Health, Safety and Sustainability committee).

Identification of topics

BAM conducted a review to identify a broad range of potential topics relevant to the company. The review included a media analysis related to the industry, review of internal documents, review of the previous materiality assessments, peer benchmarking, and a global standards review, including the list of potential sustainability topics in ESRS 1. In this process BAM focused on for example specific activities, geographies that possibly gave rise to heightened risks or adverse impacts. BAM also explicitly identified impacts through its own operations or as a result of business relationships.

To refine the list of potential topics, BAM engaged in dialogue sessions with internal stakeholders across its divisions.

Initially, in 2023, participants were invited based on their expertise in Environment, Social, Governance, and Finance to discuss actual and potential impacts, risks and opportunities. In 2025, the company updated the list and invited a total of 85 participants, representing a diverse group from all our divisions: Group, Netherlands, and UK and Ireland. The participant group included individuals with different areas of expertise and a variety of roles and levels within the organisation, ensuring a broad and inclusive perspective.

Assessment of impact materiality

During the dialogue sessions in 2025, internal stakeholders were invited to evaluate a set of materiality-related impacts. Twelve priority impacts had been identified in advance to guide the discussion. These impacts were identified based on the scoring from the 2023 assessment and the following criteria:

- Positioned close to the threshold for materiality; and/or
- Frequently misinterpreted by stakeholders regarding whether the impact is positive or negative; and/or
- Classified as ‘phased-in’ during the 2024 DMA.

Participants evaluated each impact, risk or opportunity against the following criteria: scale, scope, irremediable character (for negative impact) and likelihood (for potential impact).

Impacts, risks and opportunities were classified as material when results exceeded predefined thresholds, aligned with BAM’s Enterprise Risk Management (ERM) process. To ensure informed participation, BAM provided pre-read materials, Q&A sessions and one-on-one meetings.

The phased-in impacts:

- Training and skills development
- Work-related ill health

The impacts phased in under the DMA last year were revisited during our dialogue sessions to challenge and validate their relevance under current conditions. The assessment confirmed that both phased-in impacts remain material from an impact perspective. Accordingly, this reporting year, these impacts will be disclosed in alignment with our materiality analysis and applicable sustainability reporting standards.

Assessment of financial materiality

BAM sought to align the assessment of financial materiality as closely as possible with its existing risk management processes. Risk management and finance experts participated in dedicated dialogue sessions to identify and evaluate potential financial risks and opportunities.

During this process, BAM considered how its impacts and dependencies could give rise to related financial risks and opportunities. The assessment began with the identification of themes while maintaining links to prior analyses, including the phased-in financial effects on land banks and energy efficient buildings. This approach resulted in the identification of topics connected to the balance sheet (assets) and the income statement (both costs and revenues). We conducted a series of investigations into financial risks and opportunities, including land bank valuation under climate risk, tax implications of sustainability measures, and the transition from grey to green revenue streams.

Each risk or opportunity was assessed using a combination of quantitative analysis and qualitative insights, ensuring that decisions were grounded in data while incorporating expert judgment where necessary.

- Financial risk of climate change on BAM's land bank valuation:
  Potential impacts from flooding and land subsidence were quantified, but even under worst-case scenarios, the financial effect remained below the threshold.
- Tax related to sustainability costs:
  Tax credits and obligations linked to sustainability were evaluated, resulting in a limited financial effect, well below the materiality threshold.
- Transition to green revenue:
  While the strategic importance is high, the financial risk associated with non-green revenue was assessed as limited and not material given BAM's project-based portfolio and ongoing alignment with EU Taxonomy.
- World trade tariffs:
  An extra check was performed on global tariff disruptions and their potential impact on construction materials such as steel, aluminium and timber. The financial effect of tariff-related risks is estimated, the expected loss remains below BAM's materiality threshold and is therefore considered not material.

The process commenced with structured dialogue sessions involving internal subject-matter experts to assess whether these risks and opportunities should be considered material.

Stakeholder dialogue sessions further explored these risks and opportunities, and participants were invited to propose additional items for consideration. For risks and opportunities assessed as material, BAM conducted in-depth analyses to quantify, where possible, the magnitude and likelihood of each identified financial risk or opportunity.

Subsequently, additional internal analyses were performed, integrating both quantitative and qualitative approaches to evaluate the potential financial materiality of these risks and opportunities. The outcomes of these assessments were validated through further engagement with relevant experts and BAM's risk and finance leadership.

Following the financial materiality assessment, BAM performed a stand-back analysis to review the outcomes in the context of benchmarking, additional evidence and overall consistency with our strategic narrative and Enterprise Risk Management (ERM) framework. The purpose of this analysis was to determine whether any impacts, risks and opportunities required inclusion beyond the stakeholder assessment results to present a comprehensive picture of BAM's material issues.

As a result, we concluded that the financial risk related to the nitrogen crisis in the Netherlands and the opportunity in the energy transition market should be classified as financially material for BAM. This decision reflects our commitment to completeness and transparency rather than overriding stakeholder input.

- Nitrogen remains a significant risk in the Netherlands, influencing our ability to execute projects and secure future revenue. Legal and regulatory developments can pose (additional) risks for potential cancellations or delay of projects.
- Energy transition represents a key opportunity aligned with BAM's strategic priorities and long-term value creation, driven by the scale and urgency of new infrastructure required to decarbonise the global economy.

These risks and opportunities have no associated assets and no direct link to the financial statements, other than their potential impact on future revenue generation. From BAM's perspective, this is not a contingency matter but a forward-looking consideration essential to our strategy.

Validation of results

For each impact, risk and opportunity, we assigned a score, based on the applicable calculation methodology, as to whether it related to impact materiality or financial materiality. Using predefined quantitative thresholds, we could immediately see whether an impact, risk or opportunity met the criteria to be considered material.

During the dialogue sessions, we included a validation step within the group discussion and, where necessary, conducted additional one-on-one reviews with subject-matter experts to ensure accuracy and completeness.

During one of the dialogue sessions, experts highlighted water as a topic that warrants further investigation. The discussion focused on whether water should be considered material for our organisation at this stage, or whether it requires deeper analysis in future dialogues. Based on our current assessment, water is not considered a material impact, risk or opportunity for our operations. However, given the feedback received and the growing importance of water-related issues in sustainability frameworks, we will continue to monitor developments and reassess its relevance in upcoming materiality reviews.

For financial materiality, we combined qualitative insights with quantitative analysis. This approach strengthened the identification and classification process by grounding decisions in data while incorporating expert judgment where needed.

The integrated approach strengthened the identification and classification process by combining data-driven analysis with expert judgment. A validation step through stand-back analysis confirmed the classification of two material topics.

External stakeholders

Throughout 2025, BAM continued to engage with external stakeholders through numerous discussions centred around various ESG topics, as summarised in the table below.

These qualitative insights and context-specific perspectives helped shape the views of internal stakeholders on the identification and assessing of material impacts, risks and opportunities. During the validation process, stakeholder feedback also played a key role in confirming the relevance of the identified topics.

External stakeholder overview

External stakeholder	Processes and communication	Matters discussed
Clients	Joint project and business development, strategic partnership, workshop, (social) media, in-person meeting, podcast recording	Collaboration on sustainability, circularity
Knowledge institutions	In-person meeting, workshop, online meeting	Circularity, water scarcity, decarbonisation
Local communities	In-person meeting, workshop, information market, guest lecture, open office hours, BouwApp, voluntary work community	Safety during construction works, noise pollution and other disturbances due to construction works
Suppliers and subcontractors	In-person meeting, online meeting, virtual event	Timber certification, circularity, sustainability strategy, supply chain, hydro-treated vegetable oil (HVO), petrol engine alternative products, hydrogen and innovation
Industry bodies	Virtual event, conference, workshop, round-the-table event, in-person meeting, online meeting	Decarbonisation, sustainability nature-based solutions, climate adaptation, biodiversity, nature positive initiatives, sustainability strategy, innovation, social value
Regulators	In-person meeting, online meeting	Sustainable mobility, regeneration, climate resilience, HVO adoption by the industry, combatting climate change, sustainability strategy, carbon reduction, biodiversity
Investors and analysts	In-person meeting, online meeting, round-the-table event	Biodiversity, working conditions in the value chain, natural capital, human rights, biodiversity, sustainability
NGOs and trade unions	In-person meeting, online meeting, (social) media	Decarbonisation, safety
Media	Conference, media content	Decarbonisation, energy transition

Material sustainability impacts, risks and opportunities in 2025

The following tables list the sustainability-related impacts, risks and opportunities BAM has identified and assessed as material as a result of the double materiality assessment process. Each material ESRS topic is presented in the following tables, including sub-(sub)topics related to BAM's material impacts and risks, e.g. climate change mitigation and climate change adaptation.

In addition, BAM indicates in the tables whether the impacts, risks and opportunities lie in the company's own operations (OO) or value chain (VC). For the social material impacts, BAM indicates whether it affects its own employees (OE), own workforce (OW) or communities (COM).

Impacts are actual impacts, risks or opportunities unless stated that they are potential impacts. Brief descriptions of the material impacts, risks or opportunities are included in the tables. More information on how BAM responds to the effects of the impacts, risks and opportunities is included in the topical sections under 'Environment', 'Social' and 'Governance'.

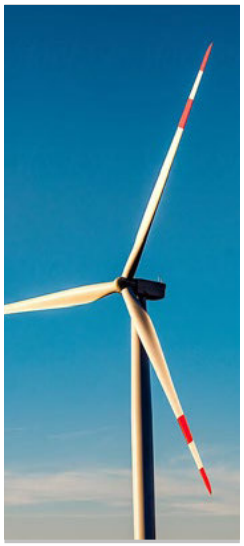
BAM recognises that the on-going due diligence and double materiality assessment process will be refined over time. The company further specifically notes that the sustainability statement may not include every impact, risk and opportunity or additional entity-specific disclosure that each individual stakeholder (group) may consider important in its own particular assessment. BAM also expects more robust outcomes through increased data insights and more clarity on the practical implementation of the guidelines and comparability across the industry in the coming years.

Disclosure requirements

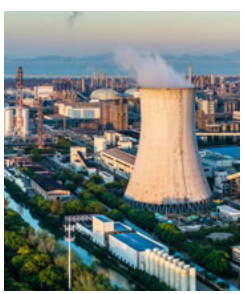
The outcomes of the double materiality assessment are fully integrated in BAM's risk management process. BAM derives forward looking guidance from this outcome and includes the relevant insights in strategy iteration and priority setting in business programmes, targets and reporting.

The relevant disclosures on material sustainability impacts, risks and opportunities are included in this report provided that the data and information are available and meet the necessary quality standards. The sustainability statement not only highlights BAM's commitment to transparency and to informing stakeholders about sustainability performance, but it also serves as a cornerstone for nurturing a responsible and resilient business approach. BAM is committed to transparency both in its knowledge and in areas where information may be lacking, striving to maintain openness in the company's reporting.

All the disclosure requirements that have been complied with following the outcome of this double materiality assessment are included in chapter 6.7.



		Material impact, risk or opportunity	*Description*		*Time horizon*
E1 - Climate change					
Climate change mitigation					
●	Negative impact (OO)	GHG emissions: Scope 1 and 2	BAM has a negative impact on GHG emissions due to the use of (fossil) fuel in BAM's vehicle fleet, construction equipment and to operate construction sites and offices. GHG emissions have a significant impact on the environment, as it leads to global warming and climate change.	Actual	S, M, L
●	Negative impact (VC upstream and downstream)	GHG emissions: Scope 3	The negative impact of GHG emissions in BAM's value chain are driven by, amongst others, the use of GHG emission intensive materials, transport and the use of sold products by clients and end users. The impact on the environment is considered significant, as it leads to global warming and climate change, extreme weather, rising sea levels.	Actual	S, M, L
●	Opportunity (VC downstream)	Energy transition	The energy transition presents a potentially material climate-related opportunity for BAM, driven by the scale and urgency of new infrastructure required to decarbonise the global economy. BAM can strengthen its market position and capture premium pricing for sustainable solutions.	Potential	S, M, L
Climate change adaptation					
●	Positive impact (OO)	Climate adaptive solutions	BAM's tender and project design activities have a positive impact on enhancing the climate adaptive design of development and construction projects, helping adjusting the built environment to climate change.	Actual	S, M, L

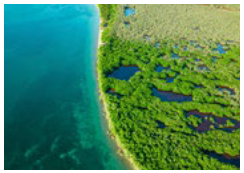


E2 - Pollution					
Pollution - entity-specific					
●	Negative impact (VC upstream)	Pollution of air and soil	Air and soil pollution in BAM's supply chain for key materials has severe impacts on both human health and the environment. It leads to diseases, and even premature death, as well as harm to crops, forests and bodies of water.	Actual	S, M, L
●	Risk (OO)	Nitrogen	Stricter nitrogen emission regulations in the Netherlands and other European markets pose a significant risk to BAM's operations. These regulations can lead to project delays, increased compliance costs and potential restrictions on construction activities in sensitive areas.	Potential	S, M, L

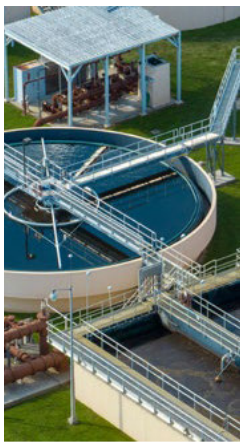
(OO) Own operations – (VC) Value chain – (OE) Own employees – (OW) Own workforce – (COM) Communities

S, M, L Short, medium and/or Long term

● *Positive impact* ● *Opportunity* ● *Negative impact* ● *Risk*



		Material impact, risk or opportunity	*Description*		*Time horizon*
E4 - Biodiversity					
Biodiversity and ecosystem services					
●	Negative impact (OO)	Biodiversity loss through land-use change	Land-use change is negatively impacted by BAM's activities, such as infrastructure development. This type of land-use change can lead to the destruction of natural habitats, fragmentation of ecosystems, and displacement of native species, which can negatively impact biodiversity.	Actual	S, M, L

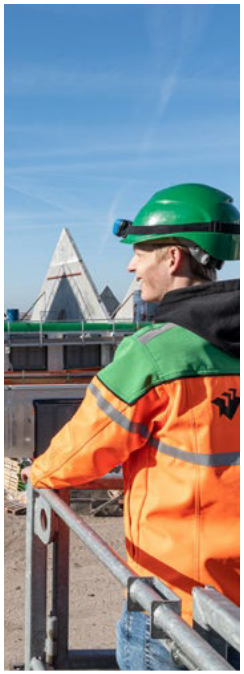


E5 - Resource use and Circular economy					
Resource use					
●	Negative impact (VC upstream)	Depletion of raw materials	BAM has a negative impact on the environment by direct resource use (i.e., overuse of raw materials, natural resources, deforestation and habitat destruction), depending on how and where the resources are sourced, as well as how a company uses them.	Actual	S, M, L
●	Negative impact (OO)	Waste (hazardous and non-hazardous waste)	BAM's waste has negative impacts on the environment and human health, including pollution of air and water, greenhouse gas emissions and the spread of disease. Improper disposal of hazardous waste can also lead to soil and water contamination and harm to wildlife.	Actual	S, M, L
●	Negative impact (OO)	Waste reuse and recycling	BAM's negative impact caused by waste can be reduced by recycling and reuse. Recycling and reuse can reduce landfill waste and air/water pollution and help to conserve the natural resources needed to produce BAM's key materials, like concrete, steel, timber and asphalt.	Actual	S, M, L
Circular economy					
●	Positive impact (OO)	Circular design	The positive impact BAM has on resource use by designing for disassembly at the product's end-of-life. This contributes to a circular economy.	Actual	S, M, L

(OO) Own operations – (VC) Value chain – (OE) Own employees – (OW) Own workforce – (COM) Communities

S, M, L Short, medium and/or Long term

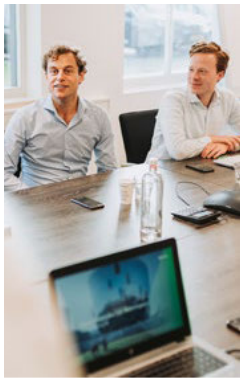
● *Positive impact* ● *Opportunity* ● *Negative impact* ● *Risk*



		Material impact, risk or opportunity	*Description*		*Time horizon*
S1 - Own Workforce					
Equal treatment and opportunities					
●	Positive impact (OE)	Diversity	Promoting gender diversity positively impacts the representation of female workers in the sector. It positively impacts employees by promoting fairness and reducing discrimination, leading to more motivated and satisfied workers. Non-discrimination practice in BAM has a positive impact on people, as it can ensure fair treatment and opportunities for all employees, regardless of their gender, race, age or other characteristics.	Actual	S, M, L
●	Positive impact (OE)	Return on inclusion	BAM aims to have a positive impact on people working at BAM through its inclusive company culture. This positively impacts the individuals by providing them with employment opportunities and the ability to be independent and self-sufficient. This can also positively impact the community by promoting a more diverse and inclusive society.	Actual	S, M, L
●	Positive impact (OE)	Training and skills development	BAM positively impacts its own employees and contributes to a safe, equitable and just society by offering training and skills development opportunities for own employees. This can positively impact individuals by increasing their job satisfaction, earning potential and employability. It can also have a positive impact on the natural environment by enabling employees to implement more sustainable practices in the workplace.	Actual	S, M, L
Occupational health and safety					
●	Negative impact (OW)	Occupational heath and safety	Working in the construction sector in general has a negative impact on occupational health and safety; evidenced by the existence of incidents, work-related injuries and lost lives for those working for BAM and work on locations managed by BAM (such as building sites).	Actual	S, M, L
●	Negative impact (OE)	Work-related ill health long-term effect	Working in the construction industry exposes workers to a variety of hazards that can cause long-term health effects.	Actual	L

S3 - Affected communities					
Social value - entity-specific					
●	Positive impact (COM)	Social value	BAM's incorporation of social value in the business has a positive impact on social mobility, improves local (foundational) economic and social inclusion (in NL also referred to as Social Return on Investment). The social value activities positively impact the quality of life of areas where BAM operates.	Actual	S, M, L

(OO) Own operations – (VC) Value chain – (OE) Own employees – (OW) Own workforce – (COM) Communities
S, M, L Short, medium and/or Long term
● *Positive impact* ● *Opportunity* ● *Negative impact* ● *Risk*



		Material impact, risk or opportunity	*Description*		*Time horizon*
G1 - Business conduct					
Business conduct					
●	Positive impact (OE)	Corporate culture	The positive impact of BAM's corporate culture, including commitment to ethical and sustainable business practices, improves employee morale and enhances reputation.	Actual	S, M, L
●	Negative impact (OO)	Prevention and detection of corruption and bribery	Potential corruption and bribery incidents can have negative impacts on society, including damaging public trust, undermining fair competition and hindering economic growth. Bribes or kickbacks may lead to substandard materials or practices being used, which could result in risks for BAM's workforce, harm to the environment and human health in general.	Potential	S, M, L
●	Negative impact (OO)	Protection of data and respecting privacy	Potential data and privacy breaches could result in loss of trust by various stakeholders, such as employees and suppliers. Data and privacy breaches could possibly escalate to have negative financial implications resulting from phishing and identity theft, among others.	Potential	S, M, L

(OO) Own operations – (VC) Value chain – (OE) Own employees – (OW) Own workforce – (COM) Communities

S, M, L Short, medium and/or Long term

● *Positive impact* ● *Opportunity* ● *Negative impact* ● *Risk*

6.2 General information and sustainability reporting principles

BAM's aim to continuously improve reporting transparency on sustainability performance and progress with respect to the strategy, resulted in this sustainability statement as part of the management information provided in this report.

Basis of preparation

Reporting framework and specific regulation (BP-1)

The sustainability statement disclosed in this annual report has been prepared on a consolidated basis in accordance with the European Sustainability Reporting Standards (ESRS) as adopted by the European Commission and compliant with the double materiality assessment process carried out to identify the information reported pursuant to the ESRS. The sustainability statement also complies with Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation), referred to in chapter 6.6 specifically.

The scope of the consolidation in the sustainability statement is the same as for the financial statements, including BAM's subsidiaries. The subsidiaries are exempted from individual or consolidated reporting pursuant to Articles 19a(9) or 29a(8) of Directive 2013/34/EU. In addition, BAM applies the ESRS to define the organisational boundary for reporting sustainability information.

- Own operations refers to the full range of activities and processes directly controlled by BAM. This includes all operational aspects where the company has direct managerial control and decision-making authority. BAM defines own operations as parent plus subsidiaries. Acquisitions and divestments are disclosed in line with their inclusion in the financial statements.
- BAM additionally assesses the level of operational control for its joint arrangements. Operational control (over an entity, site, operation or asset) is defined as the situation where BAM has the ability to direct the operational activities and relationships of the entity, site, operation or asset. The reported GHG emissions should reflect the terms and conditions of the relevant agreements. In construction projects, control is typically reflected in the share of the involved parties according to their agreed-upon contributions and risk-sharing arrangements. Despite joint decision-making protocols in most of these arrangements, operational contribution is prearranged and assigned explicitly to the different parties (i.e., expertise), reflecting in, for example, appointing key personnel and controlling day-to-day operations on specific phases of the project. Based on this practice, BAM's operational control is assumed to be equal to the equity share of BAM in the joint operation.
- Quantities of materials used in the production of BAM's products and services relate to own operations but are based on materials procured in the company's value chain. This sustainability information focuses on BAM's own operations and does not directly measure the impact of the entire value chain. However the impacts that arise from the upstream value chain are indirectly linked our own operation.
- The topic-specific definitions, methodology, reporting principles and assumptions are explained in the notes to the topical disclosures.

Further information on BAM's value chain is included in chapter 6.1 Approach to sustainability reporting.

Comparative figures have been disclosed in line with current year reporting principles and assumptions, and any topic specific deviations are disclosed.

BAM anticipates that comparatives will become progressively available after the first year of reporting. This will make the sustainability information presented in the sustainability statement more useful.

Restauration of iconic J.C.J. van Speijk lighthouse, Egmond aan Zee, the Netherlands

Disclosures in relation to specific circumstances (BP-2)

Time horizons

In general, BAM assesses material impacts, risks and opportunities over the short, medium and long term. The short term refers to the reporting period of the financial statements. Since sustainability-related matters often materialise over time, the nature of these topics warrants more forward-looking reporting. In line with the strategic period (2024-2026) BAM defines:

- 2026 as short term;
- between 2027 and 2030 as medium term; and
- beyond 2030 as long term.

In the construction sector, project lifecycles can vary significantly. In general, medium-term planning focuses on projects or goals within the span of current pipelines and contracted projects. However, in the initial effort to implement the double materiality process, BAM has opted to define a narrower timeline. This approach is intended to focus on short-term initiatives that can drive immediate improvements in sustainability performance.

BAM also recognises that external pressures (e.g., customer expectations, regulations) prioritise a shorter time horizon for achieving certain medium-term sustainability objectives. BAM aims to refine these terms going forward to demonstrate further alignment between sustainability planning, business strategy and sector realities.

Estimations, sources of estimation, and outcome uncertainty

Making judgements, assumptions and estimates is a fundamental part of preparing sustainability related disclosures. Useful contextual assumptions and those that can significantly impact measurements are explicitly disclosed in the sustainability statement to aid in the interpretation of sustainability information.

For specific metrics, BAM uses information from its value chain partners, i.e. Scope 1, 2 and 3 reporting, incident frequency (including hired workers, subcontractors), and waste (intensity). In these cases, the disclosed accounting principles clarify where, if applicable, BAM relies on third party input for its data. Reporting based on third party data deals with measurement uncertainty; for example, due to the quality or availability of data from value chain partners. BAM also used indirect sources such as industry-average emission factors, spend-based approach and extrapolations, predominantly in the calculation of GHG emissions (Scope 3) associated with BAM's suppliers and customers and, also related to the Scope 3 GHG emission baseline for 2019 and the reporting of key materials (resource inflows). These metrics are subject to a high level of measurement uncertainty. See Scope 3 GHG emissions (E1-6) and Resource inflows (E5-4) for further details.

BAM acknowledges that data sources and estimates may be refined in future reporting periods when more relevant information becomes available. Also, information to assess industry benchmarks (for example, used for estimated data with regard to resource inflows) may emerge as the number of reporters increases and reporting practices become more established.

Notwithstanding any uncertainties highlighted, the sustainability statement is prepared and presented in accordance with the requirements of the ESRS and applicable legislation.

Forward looking information

By nature, forward looking information, like plans and targets, involves risk and uncertainty because it relates to future events and circumstances. There are many factors that could cause actual results and developments to never occur or to differ materially from those expressed or implied.

Changes in the preparation or presentation of sustainability information, and reporting errors in prior periods

Changes in previously reported information can result from adjustments or restatements in the sustainability information for one or more periods.

- Restatements as a result of errors - these errors may arise from misuse or failure to use reliable information that was available and BAM reasonably could have obtained and considered. The continuous strengthening of internal control practices related to sustainability reporting aims to mitigate the risk of errors in reported information.
- Adjustments of prior period information as a result of changes in estimates and changes in methodology - these adjustments arise when new information or new developments provide additional insight about prior period cirucumstances resulting in a change in an estimate.

BAM has a sustainability reporting restatement policy that describes the principles used in case of restatements and adjustments (including both errors and changes in estimates). BAM assesses on a case-by-case basis whether the restatement or adjustment is material for the sustainability statement, including both qualitative and quantitative factors. If considered material, the prior-period reported data will be restated or adjusted, unless it is impracticable to do so. The reason why information is revised is disclosed alongside the topical disclosures.

In 2025, BAM updated the GHG Scope 3 emission factors used in spend-based calculations to the latest commercially available version of spend-based emission factors (Exiobase v3.10.1) and applied a deflation correction to match 2022 prices. These updates significantly decreased the calculated emissions for Scope 3 category 1 and 2 by aligning our data with more accurate conversion factors. To ensure transparency and comparability, 2024 data was recalculated using these updates, allowing stakeholders to observe the actual year-on-year reduction independent of changes in conversion factors. Comparative figures and recalculated comparative figures are included in the table on GHG emissions in chapter 6.3.

Furthermore BAM has included a restatement and adjustment on the primary material data reported in E5-4 Resource inflow. BAM restated a prior period error, as the 2024 data on pre-fabricated concrete for division Netherlands had been unintentionally left out of the calculation. The error was an isolated event discovered through enhanced internal control procedures in 2025. BAM concluded that the restatement has limited consequences for the relevance of the presented (management) information.

Also, BAM adjusted the average price used for the ready mix concrete calculations in 2024 in division Netherlands. This information is based on more accurate data extracted from suppliers reports in 2025.

As part of our enhanced reporting rigour in the second year of CSRD compliance, BAM is restating the 2024 comparative figures in the 2025 sustainability statement covering ready-mix concrete use and the part that is recycled content. Also, the unit of measure is converted to tonnes in order to comply with disclosure requirement of E5-4 (31a) which aggregates total weight of materials. This results in the restatement presented in the table below.

The reported figures of 2024 figures show an upward impact of 661,863 tonnes (454,354 tonnes related to the restatement and 207,509 tonnes related to the adjustment).

	2024 *(in m^3)*	**2024** *(in tonnes)*	**2024 restated** *(in tonnes)*	**2025** *(in tonnes)*
Ready mix concrete	322,808	774,739	1,436,602	1,659,266
of which: recycled content	10,281	24,674	39,658	68,494
of which: % recycled content	3.2	3.2	2.8	4.1

Structure of the report

BAM has chosen to incorporate some of the strategy and corporate governance disclosures from the cross-cutting standard ESRS 2 in the other parts of the management report, as this information is best read in close connection with the overview of BAM's activities. In the 'incorporated by reference' tables under each topical disclosure, the relevant page numbers are linked to the disclosure requirements.

This information is an integral part of the sustainability statement and included in the assurance scope. Any other references included in the narrative consider further details or explanations in other parts of the management report, but are not part of the disclosure requirements in ESRS and hence not included in the assurance scope.

The Supervisory Board has appointed EY Accountants bv to provide BAM's stakeholders with independent assurance regarding BAM's sustainability statement. BAM has obtained limited assurance for the sustainability statement reported in chapter 6 and the information incorporated by reference in chapter 2, chapter 4 and chapter 5.

On 11 June 2025, the European Commission adopted a "Quick Fix" Delegated regulation extending transitional provisions of the ESRS. Use of phase-in provisions in accordance with Appendix C of ESRS 1 BAM is disclosed below:

Disclosure requirement	**Comment on phase-in**
S1-14 Health and Safety	Datapoints related to work-related ill health disclosures (Number of cases and days lost as a result of recordable work-related ill health) are omitted as allowed by the ESRS "Quick Fix". This will be required in 2027.

Governance

Incorporated by reference:

Disclosure requirement	Reference to other chapters in the 2025 annual report
ESRS Standards: General disclosure (ESRS 2)	
GOV-1	Composition and diversity of the Executive Board and Supervisory Board are included in the biographies. Roles and responsibilities of the Executive Board in exercising oversight of the process to manage material impacts, risks and opportunities in section in chapter 4.2 Corporate Governance. Roles and responsibilities of the Supervisory Board in exercising oversight of the process to manage material impacts, risks, and opportunities in chapter 5.1 Report of the Supervisory Board.
GOV-2	Description of how the Executive Board and Supervisory Board are informed about sustainability matters in chapter 4.2 Corporate Governance and in chapter 5.1 Report of the Supervisory Board.

Integration of sustainability-related performance in incentive schemes (GOV-3)

BAM has integrated sustainability-related performance into its incentive schemes for a number of years. Sustainability targets on social as well as environmental performance are part of the Executive Board's and Executive Committee's long- and short-term incentive schemes. A description of the key elements of the remuneration policy, the integration of sustainability-related performance therein, and the proportion of the variable remuneration dependent on sustainability-related targets is included in chapter 5.2 Remuneration report. Similar short-term incentives form part of the Senior Leadership Group schemes, including sustainability-related performance targets. Long-term incentive plans are only applicable for some the Senior Leadership Group and are the same as those of the Executive Committee.

Statement on due diligence (GOV-4)

Due diligence process	**Reference to paragraphs in the sustainability statement**
a. Embedding due diligence in governance, strategy and business model	chapter 6.1 and chapter 6.5 section The role of the administrative, supervisory and management bodies (GOV-1).
b. Engaging with affected stakeholders in all key steps of the due diligence	chapter 6.1 section Interactions with stakeholders.
c. Identifying and assessing adverse impacts	chapter 6.1 section Material sustainability matters in 2025 and chapter 6.5 section Business conduct policies and corporate culture (G1-1)
d. Taking actions to address those adverse impacts	chapter 6.4 section Policies related to own workforce (S1-1) and Action taking on material impacts on own workforce, approaches to managing material risks and effectiveness of those actions (S1-4) and chapter 6.5 section Business conduct policies and corporate culture (G1-1).
e. Tracking the effectiveness of these efforts and communicating	chapter 6.4 section Action taking on material impacts on own workforce, approaches to managing material risks and effectiveness of those actions (S1-4) and chapter 6.6 section Reporting principles and assumptions confirming compliance with EU Taxonomy minimum safeguards.

BAM's due diligence process with regard to business and sustainability matters is guided by the main aspects and steps of the UN Guiding principles on Business and Human Rights, and the OECD Guidelines. The core elements of BAM's due diligence process are closely related to a number of topical disclosure requirements; refer to the Due diligence process table for an overview.

Risk management and internal controls over sustainability reporting (GOV-5)

Sustainability and sustainability reporting are embedded in BAM's overall risk management and internal control processes and systems. Throughout the year, BAM continued to operationalise its controls relating to sustainability reporting as defined within an integrated Internal Control Framework for material data points, following the 2025 double materiality assessment.

The applied reporting processes and definitions are formalised in BAM's Sustainability Reporting manual, which provides guidance on how to collect, consolidate and report data. For further information on these processes and systems, on how findings of risk assessment and internal controls are integrated into relevant functions and processes, and on the periodic reporting of findings to the Executive Board and Supervisory Board, see chapter 4.1 Risk management.

Strategy

BAM's disclosures on strategy, business model and value chain are incorporated by reference:

Disclosure requirement	Reference to other chapters in the 2025 annual report
ESRS Standards: General disclosure (ESRS 2)	
SBM-1	Description of the key elements of BAM's strategy that relate to or impact sustainability matters, as well as a description of the key elements of BAM's business model and value chain in chapter 6.1 Approach to sustainability reporting and in chapter 2.4 Strategy 2024-2026: Focus, Transform, Expand.
SBM-2	Stakeholder engagement included on in chapter 6.1 Approach to sustainability reporting.
SBM-3	Description of the key elements of BAM's strategy that relate to or impact sustainability matters, as well as a description of the key elements of BAM's business model and the resilience of BAM's strategy and business model regarding its capacity to address its impacts, risks and opportunities in chapter 2.5 How we create value for society.

Material impacts, risks and opportunities as identified through BAM's double materiality assessment process are included in chapter 6.1. All material impacts, risks and opportunities are closely connected to BAM's strategy and business model. The defined strategy, policies and underlying actions and measures are designed to manage and inform management on the progress and results, and that they are are taken into account when adapting the business model.

Impact, risk and opportunity management

Description of the process to identify and assess material impacts, risks and opportunities (IRO-1)

Disclosures related to IRO-1 Description of the process to identify and assess material impacts, risks and opportunities, referred to as BAM's double materiality assessment process, are included in chapter 6.1.

Disclosure requirements covered by the sustainability statement (IRO-2)

All material disclosure requirements are included in BAM's sustainability statement in chapter 6, in the same sequence as described in ESRS, with the exception of the disclosure for IRO-1, which is disclosed in chapter 6.1. For the reference table of all disclosure requirements, refer to chapter 6.7.

For a list of all data points that derive from other EU legislation, see the "List of data points that derive from other EU legislation" table in chapter 6.7.

The entity-specific metrics are associated with the following material impacts, risks and opportunities:

- Pollution (upstream); pollution impact has been calculated based on the relative Environmental Cost Indicator (ECI) of impact categories and also in relation to the metric on resource inflows (E5-4).
- Circular economy; circularity assessments and material passports offered in tenders by BAM are measured to track the company's actions in offering products that contribute to a circular economy.
- Occupational health and safety; IF BAM and IF Total are measured in line with industry practice, based on accidents with lost time in addition to the measurement required by ESRS S1-14.
- Return on inclusion; BAM's performance with regard to inclusion is audited and scored.
- Social value; BAM's social value activities are measured by the sum of social mobility, improve local economy and social inclusion value (SLEV) delivered as a percentage of revenue.
- Protection of data and respecting privacy; BAM is aiming to minimise the impact of potential data and privacy breaches by educating colleagues through e-learnings.
- In enhancing general business conduct, BAM makes use of e-learnings; for example, regarding BAM's code of conduct. The coverage of mandatory e-learnings executed by employees is measured as an entity-specific metric.

Refer to chapter 6.3, 6.4 and 6.5 for methodology, assumptions and further details on those entity specific metrics.

Policies adopted to manage material sustainability matters (MDR-P)

An overview of the policies relating to BAM's material impacts, risks or opportunities is provided on the next page. All policies are part of the BAM policy framework. The BAM policy framework comprises a comprehensive set of policies, procedures and guidelines that outline how BAM achieves its strategy to build a sustainable future. The framework establishes the governance structure, addresses key risk areas for BAM and ensures compliance with relevant laws and regulations. Specific BAM policies have been summarised into concise, one-page statements, available for download on BAM's website (BAM Policy Framework | Koninklijke BAM Groep / Royal BAM Group). The Executive Committee is ultimately responsible and accountable for sustainability at BAM. Focus areas are BAM's strategy, sustainability reporting and the sustainable business initiatives. Management of the divisions is accountable for the implementation of the strategy and for reporting, policies and business initiatives in the division. BAM requires management of the divisions to monitor sustainability requirements against pre-determined plans, standards and objectives, and report in line with the reporting requirements as set out in the BAM sustainability reporting manual. The scope of the policies is BAM's own operations and projects for which BAM is responsible for the administration. In all other activities, such as related to joint arrangements, for example, BAM encourages partners to demonstrate the commitments reflected in the policies. Divisions may produce instructions to meet local needs and expectations. Such instructions are consistent with, and not in conflict with, the BAM policy framework. The policies apply to all companies, employees and any other representatives of BAM. The policies are available to all BAM employees via the intranet. Input from stakeholders on the policies is obtained during ongoing discussions with employees (directly or via the relevant works council), interactions with shareholders (directly or via shareholder representative organisations) and interactions with other relevant stakeholders. With regard to the works council, their input is not part of formal (statutory) advice or consent rights in accordance with the Dutch Works Council Act (Wet op de Ondernemingsraden).

Actions and resources in relation to material sustainability matters (MDR-A)

Actions and resources in relation to material sustainability matters are integrated in the topical sections of the sustainability statement, including further details related to BAM's transition plans on decarbonisation and biodiversity. If progress is in line with targets, no specific further actions have been disclosed, as BAM considers the current policies to be effective to mitigate the impacts, risks and opportunities.

Metrics in relation to material sustainability matters (MDR-M)

Disclosure of methodologies and significant assumptions behind the metrics defined by ESRS and BAM's entity-specific metrics are included in the grey boxes in every sub-chapter of the topical disclosures. No metrics have been validated by an external body, other than by the assurance provider.

Tracking effectiveness of policies and actions through targets (MDR-T)

BAM has integrated its sustainability targets in the strategy Building a sustainable tomorrow. Targets in relation to the sustainability information included in the sustainability statement have been derived from a thorough strategic process run during 2022 and published in 2023. Ongoing due diligence with internal and external stakeholders, as described in chapter 6.1 and chapter 2.1, has been part of the process to identify these targets.

BAM's targets have not been based on scientific evidence, with the exceptions of the SBTi validated targets on decarbonisation. The targets are time-bound and outcome-oriented to monitor delivery of the strategy in line with these targets. The specific targets are included in the topical disclosures.

In case there is no target related to a metric, BAM tracks the effectiveness of its policies and actions in relation to the material sustainability-related impact, risk and opportunity via quarterly reporting to the Executive Committee on the performance of sustainability metrics. Appropriate follow-up actions are undertaken as needed to address any identified issues or opportunities for improvement. BAM reports the progress made towards these targets and discloses in the related topical disclosures.

		Topics	Related policies			
E	Decarbonisation	CO_2 emissions	Sustainability policy			
		Energy and emissions				
		Pollution of air and soil upstream				
		Financial effect: energy transition opportunities				
		Financial effect: risk of strict nitrogen emission limits				
	Circularity	Waste reduction, recycling and reuse	Sustainability policy			
		Circularity assessment and material passports		Tender assurance policy		
		Depletion of raw materials (virgin materials)				
	Climate adaptation	Climate-adaptive measures		Tender assurance policy		
		Climate-risk assessment				
	Biodiversity	Biodiversity land-use change				
S	Diversity and inclusion	Diversity	Sustainability policy	Diversity and inclusion policy* & HR perform and develop policy		Human rights guidance*
		Return on inclusion				
		Training and skills development				
	Occupational health and safety	Occupational health and safety		Health and safety policy*		
		Work-related ill health				
	Social value	Social value		Social value policy		
G	Business conduct and corporate culture	Prevention and detection of corruption and bribery	Anti-bribery and corruption policy	Conflict of interest policy		Code of conduct
		Protection of data and respecting privacy	Privacy policy	Information security governance policy	Data retention policy	
		Corporate culture				

* Policy statement is published on the website

Division policy Group policy

Sustainability policy

BAM is committed to the United Nations' Sustainable Development Goals framework. The policy applies to BAM's own operations and sets relevant criteria for the selection of suppliers. BAM encourages subcontractors and suppliers to have relevant sustainability policies in place and to adhere to any prescriptive (project) sustainability requirements so that they are in compliance with BAM's policy or any client sustainability requirements, and to be in compliance with relevant environmental protection laws and regulations.

HR policies

BAM puts its employees at the forefront of the strategy, ensuring that everybody in BAM lives its values, that leadership drives BAM forward, that BAM fosters diversity and inclusion, that BAM's employees thrive and grow, and that BAM builds communities with a focus on safety and innovation.

Policies related to business conduct

BAM's code of conduct sets expectations and commitments to uphold BAM's values and responsibilities to do things right. The policy framework establishes the governance structure, addresses key risk areas and ensures compliance with relevant laws and regulations.

6.3 Environmental information

Climate change (ESRS E1)

Climate change mitigation relates to BAM's impact and actions related to the general process of limiting the increase in the global average temperature to 1.5 degrees Celsius above pre-industrial levels in line with the Paris Agreement. This chapter covers disclosures related to Greenhouse gases (GHG), disclosure requirements on how BAM addresses its GHG emissions as well as the associated transition risks. The disclosure requirements related to energy cover the types of energy consumption that are relevant for BAM.

Climate change adaptation relates to BAM's processes of adjustment to actual and expected climate change and covers disclosure requirements regarding climate-related hazards that can lead to physical climate risks for BAM and the assets BAM builds, including the adaptation solutions to reduce these risks. It also covers physical and transition risks arising from the needed adaptation to climate-related hazards.

Disclosures are related to the following material impacts, risks and opportunities as identified through BAM's double materiality assessment process, refer to full details in chapter 6.1.

Material impact, risk or opportunity		
Climate change mitigation		
GHG emissions: Scope 1 and 2	(OO)	Negative impact
GHG emissions: Scope 3	(VC)	Negative impact
Energy transition	(VC)	Opportunity
Climate change adaptation		
Climate adaptive solutions	(OO)	Positive impact

The disclosures in this section should be read in conjunction with the disclosures in chapter 6.2 on Governance, Strategy and Impact, risk and opportunity management. Further disclosure requirements incorporated by reference are:

Disclosure requirement	Reference to other chapters in the 2025 Annual report
ESRS Standards: General disclosure (ESRS 2)	
GOV-3	Integration of sustainability-related performance incentive schemes of Supervisory Board and Executive board in chapter 5.1 and chapter 5.2.

Transition plan for climate change mitigation (E1-1)

In order to demonstrate climate leadership, BAM aims to substantially reduce emissions at a pace consistent with the 1.5°C Paris-compliant trajectory. BAM's transition plan helps to identify and highlight good practice approaches of climate action, supported by a structured methodology to evaluate BAM's performance and assess to what extent BAM is on track to meet our reduction targets. Key areas of corporate climate action include transparently tracking and disclosure of emissions; setting emission reduction targets; reducing own emissions and value chain emissions and in the long term taking responsibility for unabated and residual emissions through climate contributions and neutralisation.

Emission reduction targets

BAM is committed to reducing the greenhouse gas (GHG) emission intensity of its operations. BAM's decarbonisation targets (Scope 1, 2 and 3) are aligned with the 1.5 °C pathway, verified by the Science Based Targets initiative (SBTi), ensuring compliance with the latest scientific research and the goals of the Paris Agreement. The most recent update of this approval has been received in January 2025. This renewed target represented an improvement over BAM's previous SBTi submissions and approvals from 2019 and 2021. BAM has set targets for the medium term (2026) and the long term (2030 and 2050).

In accordance with ESRS 2, Appendix B, and pursuant to the disclosure requirements under Regulation (EU) 2020/1818, which amends Regulation (EU) 2016/1011 (the Benchmark Regulation), BAM confirms that it is not subject to exclusion from an EU Paris-Aligned Benchmark (PAB). BAM's climate change mitigation targets are compatible with the transition to a sustainable economy and with the objective of achieving net-zero by 2050.

More details on BAM's decarbonisation targets can be found in Targets related to climate change mitigation and adaptation (E1-4).

These targets have been translated into internal milestones to ensure alignment with BAM's strategic approach. The sustainability targets are fully supported by BAM's strategy 'Building a sustainable tomorrow'.

BAM's transition plan is embedded in and aligned with the overall business (financial) planning. It has been part of BAM's yearly planning and quarterly reporting cycle already for a couple of years. Both performance measurement on the targets, as well as forward steering on business initiatives are part of this cycle. BAM has explicit roadmaps for Scope 1, 2 and 3 reduction. These roadmaps are developed continuously from a more qualitative approach towards more quantitative planning. BAM is continuously monitoring target setting and related performance and is committed to update the targets at least every five years, in line with SBTi requirements.

BAM is not using carbon offsetting as a substitute for emission reductions or to meet short and medium term emission reduction targets.

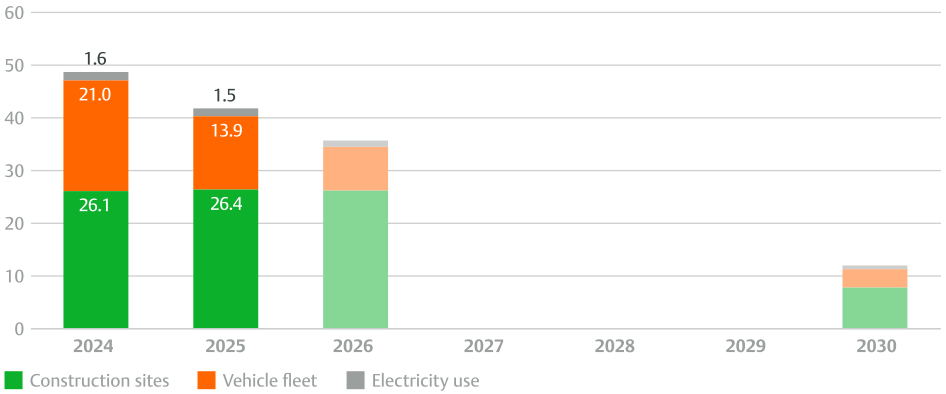
Reduction levers for own emissions

Climate change mitigation actions, decarbonisation levers and relevant changes to BAM's portfolio to support actions are the key driver to BAM's strategy 'Building a sustainable tomorrow.' The details of the transition plan are described in this section. Also BAM's progress on EU Taxonomy aligned-revenue, CapEx and OpEx is an important proof point for an increase of more sustainable business activities (refer to chapter 6.6 for BAM's disclosures in accordance with the Commission's Delegated Regulation (EU) 2021/2178 on the EU Taxonomy).

BAM's Scope 1 and 2 GHG emissions are largely dependent on the fuel used in construction equipment, company vehicles and energy efficiency of our buildings. Their year-on-year reductions are driven by BAM's ambition for emission-free construction sites and sustainable building portfolio.

The electrification of equipment is not sufficient to reach BAM's short term GHG reduction targets, which is why BAM is also replacing conventional diesel with sustainably produced HVO. The use of HVO increased to 11 million litres in 2025 compared to 10 million litres in 2024. HVO now covers 56% (54% in 2024) of the fuel use on construction sites, saving circa 20,000 killotonnes of GHG emissions (compared to diesel use).

The replacement of fossil fuels by biofuels continues to spark debate. This discussion is focused on proving the true sustainability of apparently lower-carbon biobased fuels, which is sometimes questioned due to potential adverse impacts (e.g. land-use change) during the production of biomass. BAM has given careful consideration to the use of HVO and remains satisfied that it is a necessary and suitable transition fuel to reduce CO_2 emissions in the short term. BAM sees the use of HVO as only an intermittent measure, and we are working to reduce the company's dependency on HVO for CO_2 reduction, mainly by electrifying our equipment, and consider alternative sustainable energy carriers, such as green hydrogen.



The largest source of GHG emissions in our own operations remains the fuel use on construction sites. The roadmap towards BAM's 2026 target and further reduction in 2030 also shows that the majority of the GHG reduction is anticipated to occur at BAM construction sites, as a result of further electrification of equipment and deployment of HVO.

BAM's main focus areas for 2026 and beyond to further reduce direct GHG emissions are:

- Electrification of (heavy) equipment at the construction sites, vans and company car fleet (commercial vehicles and lease cars);
- Reducing diesel use on construction sites by establishing early-stage grid connections, electrify equipment and using alternative fuels (sustainably produced biofuels) where possible. The most important measure is the use of certified sustainable HVO on BAM's own projects which will carry on in 2026;
- Electrifying BAM's company car fleet and ensuring the used electricity is renewable. Due to existing lease arrangements it will take a few years before the company cars will be 100% electrified. All newly purchased vans are electric, except when operational issues prevent this due to the reasons such as limited range;
- Use of Hydrotreated Vegetable Oil (HVO) as a renewable alternative for diesel for construction machinery, vans and trucks that haven not (yet) been electrified;
- Working towards the procurement of 100% renewable electricity in all offices and project sites for the whole group.

The demand for sustainable HVO is growing, while the supply is not expected to rapidly grow as it depends on the availability of by products. If other sectors, such as the aviation industry, also start to use HVO as a main measure to reduce fossil fuel use, this will have the potential to substantially increase the price of HVO. For BAM, this will either mean that short term CO_2 reduction targets will not be met or that additional costs will be made to cover for the price increase.

Reducing value chain emissions

Scope 3 GHG emissions are the largest contributor to BAM's GHG footprint and a key driver of the company's transition risks and opportunities. For further disclosures on Scope 3, refer to chapter 3.2.

BAM's ambitious Scope 3 reduction target for 2030 underlines BAM's commitment to reduce CO_2 emissions in the value chain. Initiatives are ongoing to reduce emissions associated with the use of raw materials, including pursuing opportunities to use more sustainable materials, such as timber, recycled steel and lower carbon concrete. BAM is actively steering on underlying drivers, such as percentage of recycled steel use and percentage of lower carbon concrete use.

To reduce downstream emissions, BAM is driven by regulatory pressure, investor expectations and client demands to construct more and more low carbon assets (A+++ and A++++ label), as these have a significantly lower energy consumption during their lifespan and are related to lower financial risks such as asset stranding. BAM is increasingly delivering low and net-zero carbon assets. While in UK the Net Zero Carbon Building Standard is still under development to unify the approach for verifying net zero building claims, BAM participates in a trial with two projects: Southam College and Lyde Green School to help inform the development of the standard.

In order to pro-actively manage BAM's Scope 3 impact, sustainability considerations are integrated into the tender evaluation process to ensure that environmental, social, and life-cycle impacts are assessed alongside cost, quality, and technical performance. Sustainability criteria are established in the pre-tender stage, focusing on carbon reduction, resource efficiency, responsible sourcing of materials, and energy-efficient construction methodologies. Sustainability performance is evaluated as a weighted component of BAM's tender assessment. Final tender proposals are reviewed and approved by a multidisciplinary team, ensuring that sustainability outcomes are considered alongside commercial and technical factors.

BAM is also steering the following Scope 3 reduction drivers:

- We are continuing and accelerating our biobased transition, primarily through our Flow housing concept and also within our Dutch construction segment;
- Low-carbon concrete (for example GROENR beton) is one of our high priority levers. Using a low carbon alternative, such as GROENR beton, allows us to reduce around 12% of emissions per each cubic meter of concrete. In 2025, the use of GROENR concrete increased by 9.2% in the application of GROENR ready-mix concrete on projects compared to 2024. At the same time, we are cooperating with our supply chain on the innovations regarding sustainable concrete;
- We are making asphalt more sustainable by producing it at lower temperatures, using high percentages of recycled materials, expanding innovative technologies like LEAB, and transitioning to zero-emission equipment across the entire asphalt chain;
- Actively discussing with clients the use of alternative sustainable materials and energy concepts, based upon our internal CO_2 calculations during the tender- and design process;
- Upskilling our colleagues to lead the way regarding low-carbon design.

For our biggest materials (concrete, steel and asphalt) we are working together with our supply chain to support transition to low-carbon materials.

In the UK&I division, we have incorporated decarbonisation scoring into our preferred supplier agreement tender for precast concrete. Our goal is to engage with suppliers on a long-term basis under this agreement to support them in their decarbonisation efforts. A similar approach is planned for ready-mix concrete in 2026. To build wider industry confidence in investing in low-carbon concrete technologies, BAM has recently joined the Innovate UK / DESNZ-supported Advanced Market Commitment Initiative. This initiative aims to establish a cumulative call-off agreement for innovative low-carbon concretes, helping drive investment in these solutions. Additionally, BAM has signed a letter of support for the use of calcined clays which is a technology considered a key contributor to short-term concrete decarbonisation, provided production can be scaled effectively.

Within the Dutch division, we are working to meet the criteria set by the Concrete Agreement (Betonakkoord), which BAM signed in 2018. As part of this effort, we issued Sustainable Purchasing Instructions this year for the procurement team. These instructions require colleagues to:

- Purchase low-carbon concrete;
- Use secondary aggregates wherever possible;
- Request suppliers to provide sustainability data using a predefined template;
- Seek internal advice from experts for projects with high concrete usage (over 100 m^3) to limit the environmental impact.

When it comes to steel, our main focus this year in the UK & Ireland has been on purchasing sustainable options for rebar and sheet piles:

- Rebar: we have set maximum carbon footprint thresholds in supplier agreements, ensuring we only purchase rebar with performance below these limits;
- Sheet piles: all sourced from EAF production.

For construction steel, no local manufacturer currently produces beams via EAF, so we are working together with the industry to accelerate this transition. We maintain close supplier engagement, collecting quarterly sustainability data and building a strong, transparent supply chain. Additionally, we advocate for governmental incentives to offset the extra costs of EAF steel, helping the industry move toward decarbonisation. One of such examples is a program called 'UK Government Procurement Policy on steel procurement' in which BAM plays an active role.

In the Netherlands, we have strong access to low-carbon steel and are steering towards 75% EAF steel by 2026. Beams produced via EAF are readily available, making it easier to integrate sustainable steel into our projects. We also promote reuse of steel wherever possible, encouraging project teams to incorporate reclaimed materials and explore EAF-produced components.

We are taking significant steps to reduce emissions from asphalt production and application. In 2025, nearly one-third of our asphalt was produced at low temperatures (Warm Mix Asphalt), combined with about 40% secondary materials. We are also expanding the use of LEAB technology across our asphalt plants, enabling lower energy consumption and CO_2 emissions. Additionally, we are scaling up cold recycling techniques, such as Bitumen Stabilised Material, which allows roads to be reused with over 95% recycled content and minimal carbon footprint. On top of that, our asphalt equipment is now more often zero-emission than diesel-powered, making construction sites increasingly emission-free without compromising quality or speed. We aim to make Warm Mix Asphalt the new standard and continue building a fully sustainable asphalt chain from production to the construction site.

In the divison United Kingdom and Ireland, the technological pathway to low-carbon asphalt and net-zero pavements like leveraging innovative carbon-sequestering aggregates, has been mapped out. Industry-wide trials are currently underway to test performance, with the goal of enabling these solutions within UK standards over the next 5-10 years. Although BAM is not directly involved in these trials, we aim to encourage clients who are open to innovative technologies to explore these approaches. At the same time, we will maximise the implementation of “approved and ready” solutions to decarbonise pavements, such as warm-mix asphalts and higher recycled content.

The Scope 3 reduction initiatives will help to bring BAM closer to its Scope 3 reduction targets, but there are also two substantial drivers to reduce BAM’s Scope 3 footprint outside of BAM’s control:

- Decarbonisation of industry: even though we are actively supporting innvation in the supply chain, the lowering of the GHG emissions of construction materials by production process improvements is still vastly outside of our control;
- Decarbonisation of energy grid: the grid in BAM’s home markets is gradually decarbonising and expected to further decarbonise towards 2030. A lower grid GHG emission intensity directly reduces the GHG emissions associated with electricity use of assets delivered by BAM (downstream emissions).

We aim to work towards our 2050 target through a combination of different drivers and external (inter)dependencies. BAM will continue to electrify our fleet and equipment and adopt sustainable fuels and increase the procurement of sustainable (e.g. circular and/or biobased) construction materials. Another driver within our control is to be more selective in our choices which markets we operate in. Our ability to become net zero is also depending on the drivers discussed in the previous paragraph (decarbonisation of industry and energy grid) and the development of legislative frameworks. At this stage, it is not yet possible to quantify the exact emissions reduction that can be attributed to each individual driver. However, BAM is confident that, collectively, these drivers sufficiently support the transition to become a net-zero construction company.

Measurement improvements and Scope 3 modelling

An important focus area for BAM is the improvement of the maturity of upstream emission data, particularly the emissions associated with purchased materials and capital goods.

In 2025, BAM also continued its efforts to improve the quality of measurement of Scope 3. BAM has explored several options to unlock activity data on its purchased goods and services. In the first place BAM focuses on key materials such as asphalt, steel and concrete. Activity data is obtained using supplier statements. Additionally, data from estimated cost calculation models (tender information) and data from building information modelling is used to obtain more accurate insights in our emissions. This would enable a clearer understanding and more accurate quantification of the impact of BAM’s reduction efforts on projects going forward. Data still needs to be integrated with the spend based calculations to verify completeness of the upstream emission recording, as efforts are not expected to result in a full picture of our value chain emissions. A remainder of spend data will always be needed to report on total GHG emissions.

In addition to detailing the decarbonisation levers, BAM believes it is also essential to quantify the Scope 3 expected impact for the coming years and assess whether the transition aligns with the emission reduction targets. For that reason, BAM developed a Scope 3 forecasting model in 2025, which provides preliminary insights in future scenarios and a quantification of BAM's Scope 3 roadmap going forward.

The first version of the model has been developed for both divisions. In 2025 the model has been set up with the intent to (1) apply a consolidated approach to both divisions and (2) introduce parameters so that BAM can create scenario analysis, in which certain interventions are more successful than others.

For some part of the business the quantification of reduction roadmaps, that are used to calculated potential reduction of our efforts, are not yet as developed as for other parts. Therefore, the current model is based on a significant amount of assumptions to forecast the reduction potential of certain interventions. These have not yet been validated by internal experts. Similarly, the introduction of the scenario parameters are based on desk research and the use of external/public (re)sources. These also have not yet been validated for further use. BAM intends to take the above-mentioned steps in the coming two years. We believe that the sharing of the premature insights coming from the model currently will lead to incorrect conclusions. However, with clear steps defined to progress the top-down modelling and further enhance this with bottom-up forecasting data, we expect this will improve our capabilities to steer on Scope 3 performance going forward. This will form a substantive part of maturing our climate transition plan towards a better defined net-zero pathway.

Investment and funding

The transition to a low-carbon economy requires additional investments across the construction value chain. BAM will mobilise funding to reduce emissions, strengthen climate resilience, and support innovation. By working with clients and suppliers to embed climate considerations into project proposals, procurement, and project delivery, BAM intents to share investment needs and manage transition risks together with the value chain.

BAM invests money and resources in this transition. Operational expenditures (OpEx) and capital expenditures (CapEx) in 2025 used for implementation of action plans have been included in the financial statements. A total of €60 million has been invested in electric equipment in 2025 (2024: €55 million). This information is linked to note 14 and note 15 of the financial statements. Future investments to electrify our equipment are included in BAM's financial planning. The financial impact is limited, as this is mostly achieved through generic replacement investments.

Locked-in emissions

Locked-in emissions refer to the future GHG emissions that will inevitably be released over the lifetime of an asset, product, or infrastructure due to decisions made today. Once a building is designed, materials procured, and systems installed, the emissions associated with their production, operation, and end-of-life treatment are largely predetermined at early project stages. For BAM, locked-in emissions fall into two major categories:

- For machinery, locked-in emissions refers to future greenhouse gas emissions that become unavoidable once a company commits to owning or operating equipment with a specific energy profile. Key drivers include the equipment lifespan (often between 8-10 years for heavy machinery), engine and fuel type (diesel, hybrid, electric, biofuel-compatible), duty cycles and utilisation rates and availability of electrification solutions. Once procurement decisions are made, the emissions trajectory associated with that machinery is largely predetermined.
- Emissions from materials and construction processes (i.e., cement, steel, insulation, transport, on-site equipment) that are committed the moment an asset is built are often emitted upfront. These embodied emissions are released prior to use-phase and cannot be reduced once construction is complete. This elevates the importance of early-stage decision-making. Also, emissions from how a building will be operated are dependent on design choices, equipment selection, and energy supply. These are spread over the asset's lifetime, often decades. The most relevant locked-in GHG emissions are therefore related to BAM's order book - projects that are already contracted to be designed and delivered in the coming years. In general, the order book reflects only a few years of forward-looking GHG emissions. However, there are exceptions for projects that will remain under construction until 2030 or later. These locked-in emissions could potentially jeopardise BAM's ability to meet its GHG reduction targets. BAM is mitigating this risk by continuously strengthening its tender process to enhance the assessment of environmental impact to reduce future GHG emissions.

Retrofits, in our housing and building renovation business, have the opposite effect. They can significantly improve operational emissions when using the asset, but rarely eliminate them entirely.

Residual emissions

BAM does not consider CO_2 offsetting for its current residual emissions, but instead we focus on meeting our ambitious short term reduction targets. CO_2 offsetting will become relevant for our long term net zero commitment for 2050. Following the SBTi net zero standard, we have committed to a maximum of 10% offsetting of our 2019 baseline figures. BAM does not yet have a concrete offsetting plan given that 2050 is still far away, but is exploring different options, such as the opportunity for future offsetting through certification of CO_2 storage in our timber projects.

Policies related to climate change mitigation and adaptation (E1-2)

A reference to the sustainability policy is in chapter 6.2 covering the sustainability practices in BAM. Further information is also available in the policy statement on the BAM website. The update of the sustainability policy is in progress.

Actions and resources in relation to climate change policies (E1-3)

In organisational terms, investments and changes have occurred in the governance of the sustainability function throughout the business. In 2025 investments in IT systems for sustainability reporting, internal training, and additional resources in the field of sustainability (reporting) have been made to reiterate BAM's focus on the topic and commitment to develop the right capabilities for this transformation.

Material impacts, risks, and opportunities and their interaction with strategy and business model (SBM-3)

Sustainability is a key driver in BAM's business model and strategic decision making. Our aim is not only to benefit our company but also to contribute to creating a sustainable future for our clients, employees, society, and future generations. We aspire to transition our business from conventional (grey) to environmentally conscious (green). By providing sustainable solutions BAM can achieve these goals. We recognise that, while the construction sector plays a role in driving climate change, BAM also holds significant potential to support climate solutions.

BAM is uniquely positioned because we translate energy-transition ambitions into physical assets. Almost every pathway to net zero like renewables, electrification, energy efficiency, circularity, requires construction capability. The energy transition creates an opportunity for BAM's business model by allowing us to decarbonise our core offerings, enter fast-growing energy and infrastructure markets, and evolve from project-based builders into long-term providers of low-carbon, energy-efficient, and resilient built environments.

BAM has identified one material climate-related opportunity related to the construction capacity that is needed for the energy transition, also refer to the disclosure of E1-9 Anticipated financial effects of climate change. The energy transition presents a potentially material climate-related opportunity for BAM, driven by the scale and urgency of new infrastructure required to decarbonise the global economy. Large investments are essential to build renewable energy assets, expand and modernise electricity grids, deploy energy storage, and retrofit buildings for energy efficiency and electrification. BAM has the capacity, expertise, and supply chains to deliver these projects, benefiting from sustained long-term demand while directly enabling emissions reductions across power, transport, and the built environment. BAM is scaling low-carbon construction methods, adopting digital and modular techniques and upskilling the workforce to reduce carbon emissions associated with projects delivered. At the same time, BAM is expected to capture growth from the energy transition, reinforcing its role as critical enabler of climate change mitigation and by building resilient infrastructure.

In 2024 BAM had identified a physical and transitional risk on valuation of the land bank comprising of land and associated building rights. This year the impact was further assessed and quantified. BAM holds a land bank comprising land and associated building rights (for valuation details as per 31 December 2025 refer to note 19 of the financial statements). This portfolio is primarily utilised for residential development and commercial use, located across BAM's home markets, mainly in the Netherlands. Long-term climate changes, including rising sea levels, soil degradation, and increasing average temperatures, can impact the land value. BAM has identified which part of the land is identified as high-risk based on specific scenarios. Also increased policy and regulations, i.e. the introduction of stricter building codes and zoning requirements, particularly related to carbon reduction goals, could affect the developability of the land bank.

The risk associated with the balance sheet position of BAM was not deemed material based on the current portfolio in 2025.

From a market perspective increasing demand for sustainable infrastructure may also enhance the valuation of land with potential for low-carbon developments while diminishing the value of noncompliant plots. Diversification of the portfolio to include land with lower physical and transition risk profiles is necessary going forward.

BAM is actively implementing measures to further enhance climate resilience. In addition to implementing the transition plan related to climate mitigation, BAM adopted climate-resilient infrastructure standards and actively organises engagement with stakeholders to enhance adaptive capacity in vulnerable regions. Given the nature of our project business, we did not identify activities that limit our ability to make strategic decisions in line with a transition to a climate-neutral economy, that could potentially jeopardise BAM's ability to execute its transition plan. Given the nature of the business, BAM is well able to adjust or adapt the strategy in the short-, medium- or long term based on change in context or progress. BAM's resilience analysis is not based on any critical assumptions or material areas of uncertainty.

Description of processes to identify and assess material climate-related impacts, risks and opportunities (IRO-1)

BAM's strategy is also designed to address the climate resilience of the (downstream) projects and assets, through BAM's climate adaptation strategy. In that respect, BAM specifically assesses climate-related physical risks for each of its construction projects. BAM has developed a climate scan that is applied to key projects where physical climate related risks are relevant to either the construction process or the asset itself. This climate scan makes use of the 'klimaateffecten atlas' (climate effects register) which is based on the fourteen climate scenarios of KNMI (Royal Netherlands Meteorological Institute) which are based on the climate scenarios of IPCC (Intergovernmental Panel on Climate Change). The most severe climate scenario used by KNMI and in BAM's climate scan is based on RCP 6.0 (Representative Concentration Pathway, global temperature rise of 3-4°C by 2100). These assessments take into account the likelihood, magnitude and duration of the hazards as well as the geospatial coordinates.

This climate scan is applied in the early phase of a project (or tender) and based on the outcome, climate change adaptation measures are discussed with clients and in most cases implemented.

BAM's 2026 target is to have this type of climate risk scans effectively introduced to all the large (A, B and C category) tenders. BAM uses a classification system based on the size and risk profile of its projects, ranging from A (highest classification) to E. A, B, and C projects typically represent medium to large projects. BAM's progress towards this target in 2025 is shown in table Climate adaption in tenders.

The climate scans that BAM is executing for projects in division Netherlands are performed based on the classification of climate-related hazards included in the EU Regulation (EU) 2021/2139 (EU Taxonomy). Refer to more details on EU Taxonomy in chapter 6.6. The climate scans in the division United Kingdom and Ireland are covering the chronic and acute risks as well, however have not been checked to align with EU Taxonomy as such.

BAM also aims to reduce the damaging effect of climate change on its construction projects by delivering climate-adaptive solutions. BAM plans to offer climate-adaptive measures, enabling its clients to choose options that make their assets more climate-resilient.

Climate adaptation in tenders

	2024	2025	Target 2026
% A and B tenders with climate risk scans	100	89	100
% A and B tenders with climate adaptive measures	96	89	100
% A, B and C tenders with climate adaptive measures	*	82	100

* Data on C tenders was not yet available for 2024 actual numbers

Targets related to climate change mitigation and adaptation (E1-4)

BAM has committed to reduce the GHG emission intensity of its operations. BAM has further increased the ambition level and included a net-zero target in the most recent SBTi update, ensuring that BAM's targets are aligned with limiting global warming to 1.5° C in line with the Paris Agreement. These accelerated targets are an important driver of BAM's strategy and have already been communicated in 2023.

The target includes specific Scope 1 and 2 targets, which are derived using market-based GHG conversion factors. BAM's GHG reduction targets are:

- Reduction of 80% Scope 1 and 2 GHG emission intensity by 2026 compared to 2015;
- Reduction of 90% Scope 1 and 2 absolute GHG emissions and reduction of 90% Scope 1 and 2 GHG emission intensity in 2030 compared to 2015 (SBTi validated);
- Reduction of 50% Scope 3 absolute GHG emissions by 2030 compared to 2019 (SBTi validated);
- Net-zero Scope 1,2 and 3 (minimum 90% reduction compared to 2019) by 2050 (SBTi validated).

In achieving targets for 2026 and 2030, BAM does not include the offsetting of any carbon emissions nor does BAM allow any offsetting as part of meeting the Scope 1 and 2 GHG emissions reduction targets towards 2030. BAM also has an underlying Scope 1 and 2 target to purchase 100% certified green electricity by 2030. BAM has a SBTi-validated net zero target for 2050 on total GHG emissions (absolute Scope 1, 2 and 3). BAM continuously tracks the effectiveness of the BAM's actions by internal reporting on the targets and related metrics. BAM also has set a decarbonisation-related target to maintain a CDP Climate A List position. This performance is assessed on a yearly basis.

Reporting principles and assumptions GHG emissions Scope 1 and 2 and energy consumption

BAM's energy consumption and greenhouse gas inventory are based on the ESRS. When referring to emissions, it is important to distinguish between CO_2 (carbon dioxide) and CO_{2eq} (carbon dioxide equivalent). CO_2 refers specifically to emissions of carbon dioxide, a major greenhouse gas produced primarily from burning fossil fuels. However, many other greenhouse gases, such as methane (CH_4) and nitrous oxide (N_2O), also contribute to climate change. To simplify reporting and analysis, these other gases are converted into CO_2 equivalents (CO_{2eq}) based on their global warming potential (GWP). CO_{2eq} allows to express the impact of all greenhouse gases in a single, comparable metric. BAM applies CO_2 equivalent conversion factors. Throughout this document, when CO_2 emissions are mentioned, BAM reports its greenhouse gas emissions (GHG) as CO_2 equivalent, and refers to the total of GHG emissions, unless otherwise specified.

As BAM is operating in a high climate impact sector (as listed in NACE sections A to H and Sections L, as defined in Commission Delegated Regulation (EU) 2022/1288), BAM further disaggregates the total energy consumption from fossil sources in the table Energy consumption mix. BAM has included the net revenue as presented in the Consolidated income statement as a full to calculate energy intensity and GHG emission intensity.

The proportion of total electricity consumption that is generated from renewable energy sources, such as solar, wind, hydro, and geothermal indicates the extent to which electricity used is derived from environmentally sustainable and non-polluting sources. Electricity used is recorded in kWh. Fuel use of leased and company cars can be entered in liters or kilometers and is converted to MWh. Activity data is mostly based on meter readings, invoices and supplier data. In instances where complete and accurate data are unavailable, BAM employs calculations or estimations utilising reliable methods and input data by the judgement call of the division's experts.

The energy consumption (reported in MWh) and GHG emissions associated with BAM's energy consumption, are calculated using conversion factors from reputable and authoritative sources, i.e. government supplied factors. The applied conversion factors differ based on the calculation:

- Country-specific conversion factors are used for all resources, e.g. https://www.co2emissiefactoren.nl/factoren/ for the Netherlands or https://www.gov.uk/government/publications/greenhouse-gas- reporting-conversion-factors-2024 for the United Kingdom.
- Tank-to-wheel emission factors are applied for Scope 1 emissions (well-to-tank is part of BAM's Scope 3 footprint)

BAM reports GHG emissions based on market-based conversion factors as well as location-based conversion factors. All conversion factors are reviewed annually and updated accordingly. To achieve consistent measurement throughout the year, BAM is updating the conversion factors in the first quarter of the year. This means that if the release date of specific conversion factors is later in the year, BAM is using prior year factors (i.e. 2024 factors). Fuel and electricity provided by BAM to subcontractors is currently included in Scope 1 and 2. If fuel and electricity is used by third parties on a BAM project that BAM has not procured, then it is part of Scope 3 to avoid double counting.

For specific information regarding BAM's operational control and BAM's value chain, refer to chapter 6.2 No changes in the reporting scope have been triggered by aligning the Scope 1, 2 and 3 reporting definitions with those in ESRS. BAM's Scope 1 and 2 GHG emissions all originate from the consolidated accounting group.

Energy consumption and mix (E1-5)

As energy consumption is closely related to the impact BAM has on climate change, this disclosure requirement provides more insights into the total energy consumption in absolute value, and BAM's share of renewable energy in its overall energy mix. The current level of green electricity is at 80% (2024: 64%) of the total electricity use.

The use of purchased green energy and cleaner fuels contribute to a decrease in GHG emissions but does not tell anything about the energy efficiency of BAM. Using the absolute energy consumption, in combination with the GHG emissions, allows better insight in the development of BAM's energy use and efficiency.

All electricity in the Netherlands is purchased from the supplier 'Eneco', with bundled energy attribute certificates (EAC) for 100% Dutch wind power. In 2025, BAM has further increased the percentage of green electricity in the Netherlands related to public and home EV charging through the purchase of unbundled EAC's. The green electricity in Ireland is purchased from the supplier 'Energia', with bundled EAC's for 100% wind or solar energy. In the United Kingdom and Belgium the green electricity purchased varies from region to region and sometimes even from project to project. Green (low carbon) electricity is coming from different electricity suppliers and supported by renewable energy guarantees of origin in bundled or unbundled procurement. BAM currently does not procure green electricity backed by power purchase agreements.

A large share of BAM's electricity consumption is being generated by the charging of its electric fleet. On most of BAM's locations renewable electricity is used. In 2025 BAM has purchased Guarantees of Origin related to the electricity use for home and public charging in the Netherlands. This option supports the push towards BAM's target of 100% renewable electricity use in 2030. As a result, BAM's renewable electricity share has increased to 80% in 2025 (2024: 64%).

Energy consumption and mix

	2024	Share of total energy consumption (in %)	2025	Share of total energy consumption (in %)
Fuel consumption from coal and coal products (MWh)	-	-	-	-
Fuel consumption from crude oil and petroleum products (MWh)	147,263	43.5	126,514	38.1
Fuel consumption from natural gas (MWh)	18,010	5.3	26,645	8.0
Fuel consumption from other fossil sources (MWh)	2	0.0	27	0.0
Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources (MWh)	23,827	7.0	13,824	4.2
Total fossil energy consumption (MWh)	**189,103**	**55.8**	**167,010**	**50.3**
Total consumption from nuclear sources (MWh)	**-**	**-**		**-**
Fuel consumption for renewable sources (e.g. biomass, hydrogen)	106,975	31.6	107,772	32.5
Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources (MWh)	41,833	12.4	56,454	17.0
Consumption of self-generated non-fuel renewable energy (MWh)	765	0.2	509	0.2
Total renewable energy consumption (MWh)	**149,573**	**44.2**	**164,735**	**49.7**
Total energy consumption (MWh)	**338,676**	**100.0**	**331,745**	**100.0**
Energy intensity (total energy consumption per net revenue, MWh/€)	0.05		0.05	

Gross Scope 1 and 2 GHG emissions (E1-6)

BAM once again reduced its Scope 1 and 2 GHG emission in 2025 compared to 2024. BAM has a reached a reduction of 76% (market-based) compared to the baseline 2015. BAM's ongoing GHG emission reduction measures such as the use of sustainable biofuels and electrification of lease fleet, and transformation to renewable electricity and electric/hybrid equipment contributed to this reduction.

Absolute Scope 1 and 2 GHG emissions per division

(in kilotonnes)	2015 baseline	2024	2025
Division Netherlands	42.8	21.7	15.0
Division United Kingdom and Ireland	49.5	26.5	26.3
Other*	92.7	0.5	0.4
Total scope 1 and 2 GHG emissions	**185.0**	**48.7**	**41.7**

* Baseline for Scope 1 and 2 GHG emssions include GHG emissions related to the divested businesses in Germany and Belgium

The negative impact of GHG emissions of BAM on the environment is significant, as it leads to global warming and climate change, extreme weather, rising sea levels and changes in precipitation patterns, affecting agriculture, water resources, biodiversity, and infrastructure. BAM's reporting includes both direct GHG emissions (Scope 1 emissions originating from BAM's own sources and leased vehicles) and indirect GHG emissions resulting from the generation of purchased electricity used by BAM, calculated with market-based conversion factors (Scope 2 emissions), and Scope 3 emissions.

Location-based method quantifies Scope 2 GHG emissions based on average energy generation emission factors for defined locations (e.g. Netherlands, UK, Ireland). Market based method quantifies Scope 2 GHG emissions based on GHG emissions emitted by the generators from which BAM contractually purchases electricity bundled with instruments, or unbundled instruments on their own. BAM's electricity is sourced through retail supply contracts with an electricity supplier (retail green electricity).

With regard to Scope 1 and 2, BAM tracks its progress compared to base year 2015. In the baseline 2015 BAM has included the comparative figures based on the financial consolidation in the reporting year 2015. This does however include the business activities of BAM that have been divested in the year's after 2015. The targets are based on intensity, hence the relative impact of divestments is limited.

In 2025, BAM further reduced the Scope 1 and 2 impact in absolute terms and for intensity as well. BAM's Scope 1 and 2 GHG emissions in 2025 are 41.7 (2024: 48.7 kilotonnes), resulting in an GHG emission intensity of 5.9, compared to 7.5 in 2024. BAM has reduced its Scope 1 and 2 GHG emissions by 76% compared to the baseline of 2015.

The use of HVO has increased to 56% of total fuel consumption on construction sites (54% at year-end 2024). Direct emissions on a handful of large joint operation projects are currently a large contributor to the remaining emissions, around approximately 30% of the total Scope 1 and 2. Changes in project schedules impact the timing of carbon emission 'rich' activities, and hence could skew BAM's year on year performance. In total BAM aims for a Scope 1 and 2 reduction of 90% in 2030 versus 2015.

BAM relies on the use of (certified) sustainable hydrogenated vegetable oils (HVO) to reduce the GHG emissions from its energy intensive construction processes, such as groundworks. At the moment, the additional costs of HVO are limited and most clients of BAM are willing to pay the premium.

Share of EV in BAM's car lease fleet has increased to 82% (66% at year-end 2024), resulting in a further reduction of Scope 1 and 2 emissions. The share in EV in BAM's company vans is 17%. Further details on BAM's energy use are disclosed in the section below.

CO_2 emissions from biogenic carbon

(in kilotonnes)	**2024**	**2025**
Biogenic carbon emissions	27,401	27,309
Fuel type		
HVO 100%	27,401	27,309
HVO 50%	-	-
HVO 20%	-	-
Total scope 1 and 2 GHG emissions	**27,401**	**27,309**

Gross Scope 3 and total GHG emissions (E1-6 continued)

Scope 3 GHG emissions (gross) are the main component of BAM's GHG inventory and are an important driver of BAM's transition risk. Total Scope 3 GHG emissions in 2025 are estimated at 1,496 kilotonnes (recalculated 2024: 1,644 kilotonnes), a factor 36 larger than BAM's Scope 1 and 2 GHG emissions. Most of BAM's Scope 3 GHG emissions fall under category (1) Purchased goods and services and in category (11) Use of sold products. By closely monitoring BAM's GHG emission targets, BAM continuously measures progress towards reducing GHG emissions in accordance with EU policy goals.

Despite BAM's efforts to improve Scope 3 measurement methodology, significant uncertainties still exist in relation to the reported Scope 3 GHG emissions (including the baseline number based on the 2019 year). Details on BAM's Scope 3 GHG emissions reporting principles and assumptions are included in chapter 3.2.

GHG emissions

	2015 baseline*	2019 baseline**	2024	2024 recalculated****	2025	Delta 2025-2024 recalculated	Target 2026	Target 2030	Target 2050	Annual % target / base year
Scope 1 GHG emissions *(kt CO_2 eq.)*										n.a.
Scope 1 emissions	170	117	41	41	38	-8%	n.a.	n.a.	n.a.	n.a.
Scope 2 GHG emissions *(kt CO_2 eq.)*										
Gross location based Scope 2 GHG emissions	33	25	19	19	17	-12%	n.a.	n.a.	n.a.	n.a.
Gross market based Scope 2 GHG emissions	15	14	8	8	4	-100%	n.a.	n.a.	n.a.	n.a.
Scope 1 and 2 GHG emissions *(kt CO_2 eq.)*										
Scope 1 and 2 location based	203	142	59	59	55	-7%	n.a.	n.a.	n.a.	n.a.
Scope 1 and 2 market based	185	131	49	49	42	-17%	n.a.	18.5%	n.a.	-8%
Scope 1 and 2 emission intensity *(in tonnes CO_2 eq. per € million revenue)*										
Market based Scope 1 and 2 intensity	24.9	18.2	7.5	7.5	5.9	-27%	5.0	2.5	n.a.	-8%
Significant Scope 3 GHG emissions *(kt CO_2 eq.)*										
Total gross indirect (Scope 3) GHG emissions***	*	3,154	2,093	1,644	1,496	-9%	n.a.	1,577	n.a.	-9%
1. Purchased goods and services	*	1,466	1,363	944	952	1%	n.a.	n.a.	n.a.	n.a.
2. Capital goods	*	117	108	77	85	10%	n.a.	n.a.	n.a.	n.a.
3. Fuel and energy-related activities	*	33	18	18	20	9%	n.a.	n.a.	n.a.	n.a.
5. Waste generated in operations	*	21	15	15	18	17%	n.a.	n.a.	n.a.	n.a.
6. Business travel	*	9	6	6	2	-62%	n.a.	n.a.	n.a.	n.a.
7. Employee commuting	*	4	2	2	1	-69%	n.a.	n.a.	n.a.	n.a.
11. Use of sold products	*	1,484	535	535	369	-31%	n.a.	n.a.	n.a.	n.a.
12. End-of-life treatment of sold products	*	19	45	45	47	4%	n.a.	n.a.	n.a.	n.a.
15. Investments	*	-	1	1	4	300%	n.a.	n.a.	n.a.	n.a.
Total GHG emissions *(kt CO_2 eq.)*										
Total GHG emissions location based	*	3,296	2,152	1,703	1,551	-9%	n.a.	n.a.	n.a.	n.a.
Total GHG emissions market based	*	3,285	2,142	1,693	1,538	-9%	n.a.	n.a.	329	-9%
Total GHG emissions intensity location based *(tonnes CO_2 eq. per € million revenue)*	*	**457**	**333**	**263**	**221**	**-16%**	**n.a.**	**n.a.**	**n.a.**	**n.a.**
Total GHG emissions intensity market based *(tonnes CO_2 eq. per € million revenue)*	*	**456**	**332**	**262**	**219**	**-16%**	**n.a.**	**n.a.**	**n.a.**	**n.a.**

* Scope 3 GHG emission data unavailable for 2015

** Baseline 2015 is applicable for Scope 1 and 2 intensity reduction; baseline 2019 is applicable for Scope 3 reduction and Net zero target on Scope 1, 2 and 3. For Scope 1 and 2 2019 is considered a comparative figure.

*** Baselines for Scope 1 and 2 differ from Scope 3 GHG emission. See for more details on baselines section E1-6.

**** 2024 disclosure has been recalculated with the most recent carbon conversion factors (Exiobase 3.10.1) for a more representative year-on-year comparison.

Reporting principles and assumptions GHG emissions Scope 3

BAM's Scope 3 inventory is based on ESRS. BAM reports its greenhouse gas emissions as CO_2 equivalent. BAM's Scope 3 estimation is based on several different data sources, methods, and assumptions. Five out of the fifteen categories are considered not applicable and/or not material for BAM, for the following reasons:

1. Category 8. Upstream leased assets: BAM's leased assets consist of leased buildings (offices) and the lease fleet. Related emissions are already included in BAM's Scope 1 and 2 emissions.
2. Category 9. Downstream transportation and distribution: As a construction-services business, no product undergoes downstream transportation and distribution.
3. Category 10. Processing of sold products: All products are sold in final form, with no further processing required.
4. Category 13. Downstream leased assets: The assets that are leased to other entities are constructed by BAM itself. This means the downstream emissions are already included in category (11) Use of sold products. In some occasions, a business unit owns assets that are temporarily under BAM's management and leased to other entities. The related GHG emissions are considered not material and therefore not included in BAM's Scope 3 inventory.
5. Category 14. Franchises: BAM does not operate a franchising business model.

The methodology, data sources and key assumption and limitations of the ten categories for which the Scope 3 emissions are estimated are listed below:

1. Purchased goods and services

This category is calculated using a spend-based method, meaning that the embodied impact of BAM's activities is calculated by collecting data on the economic value of goods and services purchased and multiplying these by relevant secondary emission factors (e.g., industry average emissions per monetary value of goods or service). The percentage of emissions calculated using primary data obtained from suppliers or other value chain partners is therefore 0% in 2025. Vendors are classified into BAM's procurement categories by the procurement team. BAM acknowledges a high uncertainty in this classification as a result of reliance on individual judgement and the limitation that vendors can only be classified as one procurement category. For the conversion from spend to GHG emissions, BAM uses Exiobase v3.10.1 The mapping of BAM's procurement categories to the corresponding categories in the Exiobase database has been carried out manually based on expert judgement. Any uncategorised spend is assigned to the Exiobase category 'Construction Works'. A dedicated tool has been developed by BAM to process the procurement data, apply the Exiobase conversion factors, and calculate the associated GHG emissions.

Exiobase 3.10.1 is the latest commercially available version of spend-based Scope 3 emission factors. These factors have been updated since 2024 to reflect the most recent data. Version 3.10.1 combines national statistics, trade data, production data, and other sources to create multi-regional input-output tables, all based on 2022 data. To ensure the correct use of the factors, BAM has adjusted its expenditure data for inflation to match 2022 price levels. These carbon factors are used to calculate Scope 3 emissions for categories 1 and 2.

The category purchased goods and services includes all emissions from BAM's projects and a proxy for emissions from joint arrangements (joint operations and joint ventures). BAM reports the GHG emissions from joint operations on the basis of operational control (for more details on this approach in chapter 6.2).

Due to limited availability of joint operation data, BAM includes the full spend of joint operations where BAM is responsible for project administration and zero spend of joint operations where BAM is not responsible for project administration. BAM has evidence that this approach does not materially deviate from the actual spend share of BAM joint arrangements. The GHG emissions associated with the asphalt procured by BAM from the joint venture AsfaltNu are seen as relevant part of the value chain, hence included in category 1.

The GHG emissions related to third party deliveries of AsfaltNU are reported under category 15 based on the BAM-share in the joint venture.

2. Capital goods

GHG emissions from capital goods are derived from the GHG emissions from purchased goods and services. After processing in BAM's tool, the total spend based GHG emissions includes both purchased goods and services and capital goods. The following Exiobase categories are considered to comprise capital goods:

- Sale, maintenance, repair of motor vehicles and parts, motorcycles, motor cycles parts and accessories
- Motor vehicles, trailers and semi-trailers
- Machinery and equipment n.e.c. (not elsewhere classified)
- Office machinery and computers

The GHG emissions from these categories are deducted from the category purchased goods and services and reported under capital goods.

3. Fuels- and energy related activities

This category contains the following subthemes: Upstream emissions of purchased fuels, upstream emissions of purchased electricity, transmission and distribution (T&D) losses and generation of purchased electricity that is sold to end users.

The first three of these sub themes are relevant for BAM, as BAM does not sell energy to end-users. The upstream GHG emission of fuels- and energy related activities for the first two sub themes are derived from the same fuel and energy use which form the basis for BAM's Scope 1 and 2 emissions. The fuel and energy quantities are multiplied by country specific 'well to tank' emission factors to cover the upstream emissions that are not included in the Scope 1 and 2 calculation. For the third sub theme, the country specific loss rate is multiplied with Scope 2 impact data.

4. Upstream transport and distribution

GHG emissions associated with upstream transport and distribution are included in category (1) Purchased goods and services. It is not feasible for BAM to distinguish transport related emissions in the used Exiobase conversion factors.

5. Waste

GHG emissions associated with the disposal and treatment of waste are based on the waste figures that BAM also reports separately. Waste quantities are categorised by BAM's waste processors into different waste streams and conversion factors from the 'Emissions Factors Hub' are used to estimate associated GHG emissions. Excavation waste is not included in this estimation as excavation waste is most often reused on site or on a different site.

6. Business travel

GHG emissions related to business travel are captured following the same process as BAM's Scope 1 and 2 emissions. BAM captures data related to privately owned cars (refunded kilometres), air and train travel.

7. Employee commuting

GHG emissions associated with commuting by car are captured following the same process as BAM's Scope 1 and 2 GHG emissions. Using country specific statistics, HR data and conversion factors the emissions related to the other modes of transport are calculated. These emissions are added up to determine total employee commuting emissions.

11. Use of sold products

GHG emissions from the use of sold products are activity-based values and are calculated by multiplying the energy use of BAM-delivered assets in 2025 by the asset's lifespan and country-specific carbon intensity of the energy grid. BAM acknowledges that emissions can fluctuate significantly year-to-year depending on the projects delivered. Different approaches are used per asset type:

- Residential Units: for residential buildings in the Dutch market, BAM estimates expected energy use by combining the BENG2 value, average energy consumption per energy label, or a reference project (depending on data availability) with the actual or national average floor area of dwellings. GHG emissions are then calculated by multiplying the asset's expected lifespan by its annual energy intensity and the country-specific carbon intensity. A lifespan of 75 years is assumed for new homes and 25 years for renovations. As a conservative approach, BAM applies the GHG factor for electricity from an 'unknown source' or the national average, as the specific energy carriers for estimated energy use cannot currently be determined.
- Offices: a project list of all assets delivered in 2025 is compiled for both divisions. In the Netherlands, energy consumption is estimated using the BENG2 value, while in the UK and Ireland, the BER value serves as an indicator of expected energy use. A lifespan of 50 years is assumed for new builds and 40 years for renovations.
- Civil engineering assets: for assets like roads, railways, and foundations, energy consumption during use is minimal. These typically include low-energy components, such as LED lighting and electronic traffic signs. Given the low impact, BAM estimates emissions for civil assets in 2025 based on the same share as in 2024, which is 5,5%.
- Fugitive emissions: Fugitive emissions are not included in BAM's Scope 3 emissions. BAM has made an initial estimation based on average European leakage rates and common refrigerants in the UK and the Netherlands. These emissions are excluded from total Scope 3 calculations due to uncertainty around the Scope of projects for which these estimations are applicable.

12. End of life treatment of sold products

The GHG emissions associated with this category are calculated based on the properties and assets used to calculate Scope 3 category 11. First, the total floor area of the assets developed under category 11 is determined. This floor area, measured in square meters, is then multiplied by a BAM-specific average amount of demolition waste per square meter for each asset type.

The resulting waste mass is allocated to different end-of-life scenarios, with the distribution based on BAM's waste treatment activities in 2025. Finally, the mass in each end-of-life scenario is multiplied by the appropriate emission factor from the 'Emission Factors Hub', the same source used in category 5.

15. Investments

BAM has one relevant investment in AsfaltNu. Emissions associated with the asphalt from AsfaltNu procured by BAM are already reported under category 1 in line with the approach of BAM's joint venture partner. BAM has accounted for the BAM-share of GHG emissions of asphalt delivered by AsfaltNu to third parties, other than the joint venture partner, under category 15.

For 2025, the same methodology and assumptions were used as for 2024. Primary data was used to calculate 20% of the 2025 Scope 3 GHG emissions. BAM applied one reclassification related to the share of emissions of asphalt delivered by AsfaltNu to third parties under category 15 Investments instead of under category 1 Purchased goods and services. The reclassification concerned 3.637 t of CO_2.

In 2024, BAM recalculated its 2019 Scope 3 baseline following the same methodology as for the 2024 disclosure. BAM reports this baseline in the sustainability statement for the first time in 2024 . The baseline was calculated on a 'like for like' basis. Only the business activities that were part of BAM in 2024 were included, meaning that the parts of Belgium and all the Germany business activities divested between 2019 and 2023 are excluded from this baseline. BAM International is only included in the 2019 baseline for upstream activities. Emission data on projects delivered by BAM International in 2019 is not available.

The Scope 3 baseline was calculated using, as much as possible, the same methodology applied in 2023 and 2024. The only significant difference is in Category 11 - Use of Sold Products. In 2019, a larger portion of this category was extrapolated due to limited data availability for certain business activities. As a result, approximately 27% of the total 2019 Scope 3 footprint is based on extrapolation, compared to 5,5% in 2025.

Scope 3 emissions represent the largest share of BAM's total greenhouse gas (GHG) footprint, with Category 1: Purchased Goods and Services being the most significant contributor. In 2025, we updated the emission factors used in spend-based calculations to the latest Exiobase dataset (defined for 2022) and applied an inflation correction to match 2022 prices. The impact of the update of the conversion factors on upstream emissions was around -27% and the impact of inflation correction between 2022 and 2025 an additional -10%. We have also done a lot of progress in mapping our procurement categories to the correct Exiobase factors, with changes this year adding +10% to our emissions due to recategorisation of suppliers. All these updates significantly decreased the calculated emissions for Categories 1 and 2 by around 30%, compared to the methodology used last year. To ensure transparency and comparability, 2024 data was recalculated using these updates, allowing stakeholders to observe the actual year-on-year reduction independent of changes in conversion factors. It can therefore be seen that the total Scope 3 emissions in 2024 are 21% lower when recalculated using the updated conversion factors and inflation correction compared to the numbers that were disclosed in last year's report. This recalculation only impacts categories 1 and 2.

Recognizing the limitations of spend-based data, BAM is actively transitioning toward activity-based data collection to improve accuracy and decision-making. To address this method's sensitivity to price fluctuations and procurement dynamics we introduced a project-level carbon calculation method at tender stage, enabling carbon considerations before bidding decisions. Starting from the 1st of January 2025, every tender at BAM Bouw & Techniek Projecten performs a compulsory carbon calculation. This is being rolled out within other segments and in 2026 all segments will implement carbon calculation in selected business units. For further measurement improvements, refer to BAM's climate transition plan in E1-1.

We also began integrating activity-based data for key materials - including asphalt, steel, and concrete - into our internal spend-based dataset for more precise insights. As supplier data collection remains one of the biggest challenges in Scope 3 reporting, we continue to engage with our supply chain to obtain more granular, supplier-specific data, addressing this challenge and scaling the use of primary data over time.

While we are working to improve the accuracy of our reported Scope 3 figures, fluctuations can still occur due to project delivery timelines, meaning year-on-year changes do not always reflect actual reductions. Additionally, our upstream Scope 3 figures have undergone a significant update with revised conversion factors, moving from Exiobase version 3.8.2 last year to 3.10.1, which has contributed to increased accuracy in our reporting.

Looking at downstream emissions (Category 11: Use of Sold Products), results are strongly influenced by the number, type, and size of buildings delivered in a given year, as well as by methodological assumptions. Between 2024 and 2025, downstream emissions decreased by 31%.

In 2025, BAM delivered 11% less building area (m^2) compared to 2024, while the carbon factor for electricity in the Netherlands decreased by 18%. In addition, individual large projects can have a disproportionate impact on reported downstream emissions in the year of delivery. For example, a large construction project can account for up to 9% of total downstream emissions in a single year. Accounting for Scope 3 downstream emissions is dependent on the delivery date, so this illustrates the inherent volatility in year-on-year figures driven by project mix and delivery timing.

Several portfolio-specific factors further contributed to the reduction. For BAM Wonen, last year's calculations were based on an assumed average apartment size of 118 m². In 2025, actual apartment size data became available, revealing that many apartments were significantly smaller, in some cases as small as 22 m². Furthermore, lower delivered building area by Bouw & Techniek compared to last year and the delivery of a major project within Specials with an excellent energy performance rating further contributed to the observed reduction.

These reductions were partially offset by developments in BAM Belgium. In 2024, emissions were extrapolated, whereas in 2025 activity-based data was used. This methodological change led to a reported increase in downstream emissions for Belgium, which counterbalanced some of the reductions achieved elsewhere, particularly those driven by BAM Wonen.

Overall, the 31% decrease in downstream emissions reflects a combination of reduced delivery volumes, improved energy performance of the delivered projects, and more accurate, activity-based data, alongside expected volatility linked to project mix and delivery timing.

In total, BAM's Scope 3 emissions are reported 53% lower than in our base year 2019. This is a promising result, but not representative in terms of BAM's reduction efforts in our portfolio. BAM intends to review its Scope 3 targets to make sure the targets remain ambitious and effective. In the meantime, we focus on our efforts to meeting our 2030 target, as we anticipate that we need to compensate for increased emissions due to an uptake of delivered projects and business growth in the coming years, and continue to work towards our net-zero ambition for 2050. For details on our pathway to net zero, please refer to the Climate Transition Plan in chapter 6.3.

Anticipated financial effect of climate change (E1-9)

The energy transition presents a potentially material climate-related opportunity for BAM, driven by the scale and urgency of new infrastructure required to decarbonise the global economy.

Energy transition related revenue were around 15% of total revenue in 2025, of which one third in division United Kingdom and Ireland and two-third in division Netherlands, and growth is expected to continue. Energy transition related revenue includes projects regarding converter (land) stations and high and low voltage grid upgrades, energy efficient homes and buildings, including refurbishing, EV charging solutions and the partnership with Rolls Royce for Small modular nuclear reactors (SMR's).

A strong demand in these markets is expected for 2030-2035. Priority of governments in the Netherlands, United Kingdom and Ireland to improve the energy security for the future is high. The plans are backed by substantial investment plans of grid operators, which prefer to secure capacity via collaborative frameworks and long-term contracts. UK government backs plans for GBP 70bn investments in 2026-2031. In division Netherlands, BAM had recent contract wins in this market, for example the long-term contracts for Enexis in Limburg and Noord Brabant. There are several projects in tender award phase for 2026 and beyond.

BAM invested in capex and workforce upskilling to expand capacity in renewable energy, grid infrastructure construction, energy-efficiency retrofits of existing buildings and EV charging projects.

Pollution (ESRS E2 – entity-specific)

BAM's negative impact caused by air and soil pollution is associated with the upstream value chain, including emissions and hazardous substances generated by BAM's suppliers and upstream joint venture partners.

Disclosures are related to the following material impacts, risks and opportunities as identified through BAM's double materiality assessment process, refer to full details in chapter 6.1.

Material impact, risk or opportunity		
Pollution		
Pollution of air and soil	(VC upstream)	Negative impact
Nitrogen risk	(OO)	Financial Risk

The disclosures in this section should be read in conjunction with the disclosures in chapter 6.2 on Impact, risk and opportunity management. The topic of pollution is closely connected to the other environmental sub-topics such as climate change and biodiversity. The seven greenhouse gases connected to air pollution are included in section Climate change (ESRS E1), biodiversity loss as a direct impact of pollution is addressed in section Biodiversity (ESRS E4). Upstream pollution in BAM's value chain is identified as a material impact in BAM's double materiality assessment. The related disclosure requirements in ESRS E2-4 until ESRS E2-5 are specific to own operations, which is not considered material to BAM. ESRS E2-6 is disclosed with regard to the material financial risk related to the Dutch nitrogen-crisis. Refer to BAM's double materiality assessment process in chapter 6.1 for more details.

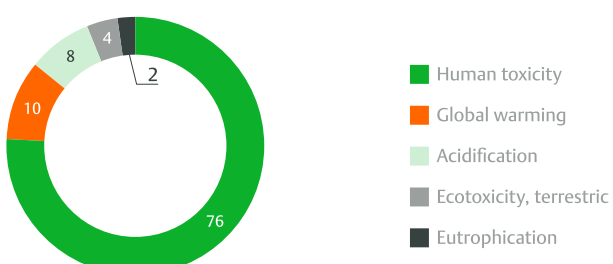
Description of the processes to identify and assess material pollution-related impacts, risks and opportunities (IRO-1)

In 2025, BAM has screened its upstream business activities in order to identify its actual and potential impact. Based on internal consultations with subject matter experts, and consultations with key parties in BAM's supply chain, the relevant upstream activities have been identified. BAM further discloses the assumptions and tools used in the impact assessment. The most impactful categories in relation to upstream pollution for BAM are global warming, human toxicity, ecotoxicity, acidification and eutrophication. The estimated relative impact of upstream pollution is enclosed in the graph in this paragraph.

The distribution is comparable to last year, with no significant changes. Human toxicity remains the most dominant contributor to the total of upstream pollution, which was 70% in 2024. This share increased in 2025, primarily due to large amounts of steel use in our construction projects in Ireland and improvements in data quality. Human toxicity refers to the adverse effects that pollutions have on human health. These impacts can arise from various sources of pollution and is the most impactful pollution for BAM. BAM's upstream pollution also has a significant impact on acidification, eutrophication, and ecotoxicity (terrestic), and as described earlier on global warming.

Relative estimated impact of pollution in BAM's upstream value chain*

(in %)



* Pollution emission figures are calculated with estimated assumptions

With the impact on human toxicity in BAM's upstream operations, BAM will further investigate on the awareness about human toxicity impact and intends to reduce that impact going forward. In depth information about the global warming emissions in relation to the climate impact of BAM can be found in BAM's Scope 3 disclosures in section Scope 3 and total GHG emissions (E1-6). Acidification, eutrophication and ecotoxicity have comparable percentages in relation to the total pollution, and a limited impact compared to the other two categories.

BAM further investigated its upstream activities and the impact in pollution category 'Human toxicity', for further details, refer to the text box Reporting principles and assumptions pollution in this paragraph. As a result of this analysis BAM was able to drill down on to activity type to check which activities are the most impactful. BAM determined that upstream pollution from the primary materials, asphalt, steel and concrete, but also from installation works have a significant negative impact specifically with regards to human toxicity.

BAM's activity 'installation works' consists mainly of mechanical and electrical installations. In addition to installation works, category 'exterior and interior work' is significantly impacting human toxicity. This is attributable to its material use and related activities, such as aluminum and curtain walling, ceiling and partition wall systems, facade cladding metal (zinc, aluminum, copper, steel) and the use of stone product and brickwork. BAM recognises the need to address this negative impact on human toxicity in its upstream operations.

Policies related to pollution (E2-1)

While BAM's sustainability policy does not explicitly address pollution, the policy does provide guidance on material use. With the efficient use of materials and use of sustainable alternatives BAM intends to minimise the upstream pollution. BAM is doing research on how this should influence the procurement processes for the purchase of materials.

External regulations take precedence over internal policies when it comes to pollution control. Local authorities have the mandate to impose restrictions on emissions and environmental impact related to material production. Companies must obtain operating licenses, which include specific conditions, such as limits on production volumes and allowable pollution levels. These licenses are monitored and enforced by the relevant local authorities, ensuring compliance with environmental standards.

Actions and resources related to pollution (E2-2)

BAM intends to provide more detailed reports on upstream pollution in the coming years. The availability of more qualitative data from ongoing analysis, data improvements and the increasing knowledge regarding emissions will enhance the quality of these reports.

BAM focuses on minimizing upstream pollution through a combination of strategic measures and process optimisations. The main pillars are:

- Efficient use of materials: BAM actively manages material consumption during design and execution phases. This includes optimizing structures, applying digital design tools, and avoiding over-dimensioning.
- Reduction of primary materials: There is a strong focus on reducing the use of non-biobased virgin materials such as concrete, steel, and asphalt. These materials cause significant pollution during extraction and production. BAM works on substitution by recycled or biobased alternatives and explores innovative solutions such as circular construction materials.
- Research and knowledge development: Continuous research into the environmental impact of materials and collaboration with value chain partners to make emissions more transparent. This will lead to better traceability and reporting of upstream pollution.

BAM considers the specific mitigation hierarchy to allocate actions and resources:

- Avoid pollution, including any phase out of materials or suppliers that have a significant impact
- Reduce pollution, for example meeting the Do No Significant Harm criteria for pollution prevention and control according to the EU Taxonomy Regulation and its Delegated Acts (minimisation of pollution)

Target related to pollution (E2-3)

Pollution is not included as a specific element in BAM's strategy. In BAM's research and discussion with experts, BAM has concluded that a separate target for upstream pollution is not suitable, and recognises the strong dependency on material use. Therefore, upstream pollution is incorporated in the (indirect) targets set for the reduction of non-biobased virgin materials: BAM aims to achieve a 50% reduction by 2030 compared to 2019. The focus is on reducing the consumption of primary materials such as concrete, steel and asphalt. Those materials have substantial environmental impact and result in air and/or soil pollution that occurs during the extraction and processing of the materials. Also, BAM tries to substitute these high-impact materials for a more sustainable materials and/or recycled materials. For further details on (targets related to) material use, refer to section Resource use and circular economy (ESRS E5).

Reporting principles and assumptions pollution

BAM has used procurement data to gain insights in upstream pollution. Upstream pollution emissions from purchased goods and services are based on BAM's spend data. The spend data is converted into pollution emissions using public available conversion factors. BAM has selected Exiobase v3.8.2. as the emission factor database to convert spend data into pollution data and impact categories. The BAM procurement categories have been manually mapped against the categories in the Exiobase database based on expert judgement. BAM used the Environmental Cost Indicator (ECI) to compare impact categories with each other. BAM considers this calculation as the most effective method currently available for assessing upstream pollution. This approach highlights the category where BAM has the highest environmental impact. There is an expectation that over time, the methodology for measuring upstream pollution will improve, potentially involving updates of weighting factors and measurement methods. BAM does not yet disclose the absolute emissions related to the different pollution categories, because of estimation uncertainties of this level of detail.

BAM does not disclose the amount of pollutants that are emitted through BAM's purchased materials in 2025. When the traceability of purchased materials improves, BAM will be able to report in the future on the amount of pollutants. If material to BAM, BAM includes the operating expenditures incurred in the reporting period in conjunction with major incidents, including any provisions for the environmental protection and remediation costs, e.g., for rehabilitating contaminated sites, removal of environmental contamination at sites and similar measures. No such material remedial (financial) actions have come to BAM's attention in 2025.

Asphalt production

Asphalt production is a critical component in BAM's construction operations, yet it is essential to acknowledge its environmental impact, particularly concerning upstream pollution. The production process involves a substantial impact on human toxicity due to the extraction and refinement of raw materials. The most impactful emissions are benzene and Polycyclic Aromatic Hydrocarbons (PAHs), which releases during the production of new asphalt mixtures with the use of recycled asphalt. BAM is committed to implement sustainable practices and explore innovative technologies to minimise these environmental impacts. BAM's asphalt supplier in the Netherlands is the joint venture AsfaltNu. In 2022 and in 2023, operational carbon filters were installed in various asphalt plants from AsfaltNu which ensure a significant reduction in emissions. In the meantime, the plants are working on smarter and more sustainable techniques for the longer term. AsfaltNu started building a new asphalt plant in 2025, where innovative techniques take care for a production that has a low pollution in emissions, fragrance free and is almost noise free.

For the Netherlands as well for the UK and Ireland, environmental performance in the asphalt sector is increasingly shaped by national and regional sustainability goals. Local authorities play a key role in regulating emissions and environmental impacts related to asphalt production. Companies must obtain environmental permits that include specific conditions such as limits on production volumes, emissions to air, and noise levels. These permits are monitored and enforced to ensure compliance with environmental standards, forming a critical part of the MKI (Milieukostenindicator)-based approach or the Life Cycle Assessment-based approach to sustainable infrastructure.

Steel production

Steel production is from origin a fundamental material for construction work and is also associated with significant upstream pollution. The production of steel leads to high nitrogen emissions, which have a negative impact on the environment. The production of steel also leads to the emission of particulate matter, which has a negative impact on the human toxicity. The traceability of steel in the construction sector is complex due to the multifaceted nature of the supply chain.

Many companies have already set greenhouse gas (GHG) emission reduction targets. However, steel producers continue to lag in defining clear and actionable emission reduction plans. Pollution levels are partly constrained by the requirement for local operating licenses, which impose certain environmental standards.

Regulatory oversight plays a key role: emissions from chimneys are measured by supervisory authorities, while regional environmental agencies monitor compliance more broadly. In addition, national policies introducing stricter nature and environmental regulations are reinforcing the urgency to reduce emissions across the sector.

In the Netherlands, BAM has taken a leading role in the Bouwakkoord Staal (Steel Construction Agreement), joining forces with other frontrunners in the construction sector to reduce the use of raw materials and promote more sustainable steel production. BAM is particularly committed to stimulating the reuse of steel, with a strong focus on accelerating this transition within the infrastructure sector.

The Bouwakkoord Staal sets out national ambitions for the entire steel construction value chain, including:

- A minimum 60% reduction in CO_2 emissions compared to 1990 levels,
- Increased use of renewable energy and energy-saving measures,
- Lower environmental impact from substances that pose risks to human health and the environment,
- Promotion of reuse and recycling of steel objects, components, and materials.

Through these joint efforts, the sector aims to contribute meaningfully to the necessary national and international climate transition by 2030.

BAM will further investigate in their traceability to reduce the impact in pollution. BAM focuses on the reduction of the consumption of steel related to BAM's targets for the use of primary materials. BAM will use as much as possible recycled steel, currently at a level of 67% (2024: 67%) recycled steel use relative to the total steel consumption, refer to section Resource use and circular economy (ESRS E5) for further details.

Concrete production

Concrete production is also associated with considerable upstream pollution. This has severe impact on climate change and also affects human toxicity. BAM is not yet able to measure and report in detail about the exact emissions of concrete, due to various variables, such as regional production and the lack of activity data. Quantification of the specific amounts of concrete is considered a valuable insight, as the specific substance and the level of sustainable production per supplier varies. BAM aims to reduce the consumption of concrete and/or replace it by more sustainable concrete or other materials. For example, BAM's initiative 'GROENR BETON' allows BAM to use more sustainable concrete which reduces the pollution of the concrete production. Additionally, BAM aims to collaborate as much as possible with suppliers that have climate and sustainability-related certifications, such as ISO 14001 and CSC Certification.

In the Netherlands, the Betonakkoord sets the framework for sustainable concrete production, with clear limitations on MKI (Milieukostenindicator), pollution, and circularity. These form the foundation of the Roadmap Sustainable Concrete, which outlines sector-wide reduction initiatives, including estimated emission reductions and the relevant value chain actors involved.

For the UK and Ireland, upstream pollution is increasingly addressed through a combination of regulatory frameworks and industry-led roadmaps. The UK Concrete and Cement Industry Roadmap to Beyond Net Zero outlines a comprehensive strategy to reduce emissions across the entire value chain, including upstream activities such as raw material extraction, transport, and cement production.

Anticipated financial effects from material pollution-related risks and opportunities (E2-6)

The nitrogen risk in the Netherlands is a financial exposure that potentially affects BAM through a regulatory & policy risk. Dutch courts have ordered the government to cut nitrogen emissions significantly by 2030 to meet EU rules, with potential fines if targets are missed. Ongoing policy uncertainty (shifts in standards, possible loosening, changes to permit systems) potentially affect BAM's project planning and compliance costs.

Further transition risks are limited as the nitrogen emissions in BAM's own operations are relatively low. The financial consequences of shifting to lower-nitrogen activities, such as altering operations or investing in cleaner technology are linked to the use of electric equipment. The investments in electric equipment are already part of the transition plan to reduce GHG emissions, refer to section Climate transition plan (E1-1).

Current projects face no immediate delays. BAM's dedicated nitrogen taskforce, comprising experts from all businesses in division Netherlands, closely monitors legal developments and their impact on projects. We proactively assess nitrogen risks in tenders to avoid exposure to potential cancellations. Through careful monitoring, adaptive planning, and a diverse project portfolio, we aim to remain resilient while contributing to national goals for emission reduction and ecological recovery.

For 2026 and beyond, BAM still faces uncertainty around how the nitrogen policy will evolve, particularly regarding future permit availability and regional emission ceilings. Project timelines and investment decisions could be disrupted if rules tighten, causing delays, cancellations, or added compliance costs that are difficult to estimate today. Political dynamics and court decisions add volatility, which can make long-term planning and pricing of projects even more difficult.

Biodiversity and ecosystems (ESRS E4)

Biodiversity refers to the variety and variability of life forms on Earth, including the diversity of species, ecosystems, and genetic variations within those species. It encompasses everything from plants and animals to microorganisms, as well as the ecosystems they form, like forests, oceans, and grasslands. Essentially, biodiversity represents the richness of life in all its forms, and it is crucial for maintaining ecological balance, supporting human life.

The construction sector is a major driver in the decline of biodiversity. BAM aims to help reduce the loss of biodiversity, specifically in its own operations and protect ecosystem services, working towards a world where nature and human activities are in balance. BAM's strategic approach is focused on gaining insights in the biodiversity impacts on its project and propose and deliver biodiversity enhancing measures where possible.

The following material impacts, risks and opportunities are listed below, these are identified through BAM's double materiality assessment process, full details can be found in chapter 6.1.

Material impact, risk or opportunity		
Biodiversity		
Biodiversity loss through land use change	(OO)	Negative impact

Transition plan for biodiversity (E4-1)

BAM recognises that its operations can affect biodiversity and ecosystems, both directly during the construction process and indirectly through material sourcing. Land use and land conversion during construction and infrastructure projects present significant challenges for plants and species, and the ecosystems they form. At the same time, BAM has opportunities to make a positive contribution. Targeted restoration measures can create new habitats or improve existing ones. In conclusion, dependencies and impacts create both risks and opportunities. To address this, BAM has integrated biodiversity considerations into its corporate strategy and business model.

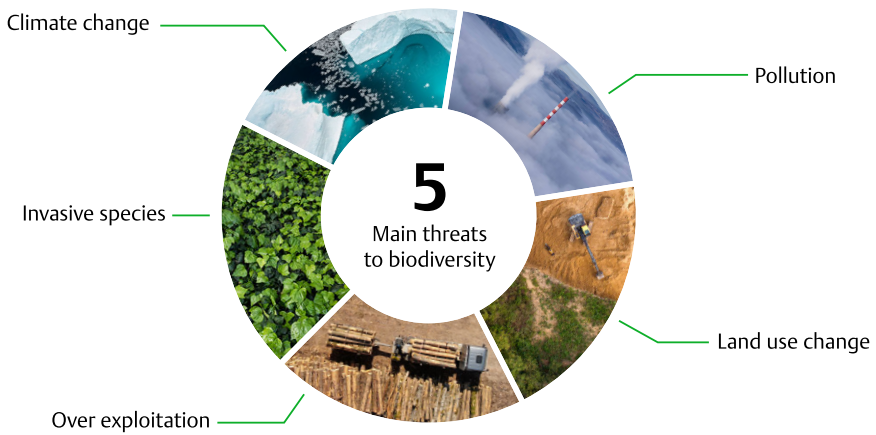
Biodiversity related strategic targets include offering biodiversity enhancing alternatives in our developments where BAM is involved in the design process of a tender or development. National and globally recognised frameworks lay the foundation for the biodiversity enhancing measures BAM offers in its tenders and developments. Furthermore, our approach aligns with global biodiversity goals, including the Kunming-Montreal Global Biodiversity Framework (KMGBF), setting a strategic and sustainable direction for achieving a nature-positive world by 2050.

The resilience of BAM's strategy includes consideration of biodiversity related impacts and dependencies. In practice, this translates to integrating sustainable practices in our own operations and value chain.

- By anticipating and mitigating biodiversity risks in our operations and projects, construction-related impacts are minimised and BAM contributes by restoring degraded ecosystems.
- In our upstream value chain, BAM implements sustainable resourcing through certified materials and utilizing low-carbon or recycled alternatives to traditional materials.
- Developing employee expertise to enhance the ability to mitigate biodiversity related risks on projects.

BAM has drawn on the 2019 Intergovernmental Science-policy platform on biodiversity and ecosystem services (IPBES) Global Assessment Report to translate the Kunming-Montreal Global Biodiversity Framework goals into actionable measures for BAM. The identified primary drivers are included in the visual main threats to biodiversity.

Main threats to biodiversity



As a result, BAM translated these insights into an actionable biodiversity approach in 2024: BAM Biodiversity+. The assessment was originally developed in the division United Kingdom and Ireland, and has been adapted to the Dutch context. Regulatory and industry best practices lay at the foundation of this approach:

- ESRS E4 Biodiversity and Ecosystems.
- The British Standard BS 8583 Biodiversity.
- The Building Research Establishment Environmental Assessment Method (BREEAM) for Infrastructure.
- The Chartered Institute of Ecology and Environmental Management (CIEEM) Biodiversity Net Gain: Good practice principles for development.
- The Expedition Engineering's Embodied Biodiversity Impacts of Construction Materials research report.
- GRI 101: Biodiversity 2024.

Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

A detailed overview of sites by identified impacts and dependencies is disclosed in this chapter. BAM's activities can impact biodiversity across all sites it owns or operates. We distinguish between:

- Direct impact on sites under full operational control (owned land).
- Indirect impact linked to design and build activities on client-owned construction sites.

BAM considers direct impact on biodiversity when a new construction footprint is causing land use change and loss of habitats as part of the property development activities of BAM. Indirect impacts, more focused on the construction design and build BAM is performing. For instance, shipping and transporting materials can introduce invasive species, which can damage ecosystems over time. In many cases, a single action can cause multiple types of impact; for example, developing a new road to a remote location causes impact through construction and often increases habitat degradation of adjacent areas due to improved access.

To assess material direct impacts, BAM mapped its owned sites against biodiversity-sensitive areas. Proximity thresholds increased compared to the prior year. The applied thresholds are based on the Integrated Biodiversity Assessment Tool (IBAT) methodology. Further details regarding the methodology can be found in reporting principles and applied assumptions. An overview is presented in this paragraph. In total, seven sites are of high relevance, meaning that they are within 500 meters of a key biodiversity area. The remaining sites are more than 500 meters, but less than 10 kilometers from a key biodiversity area.

Number of offices and depots near biodiversity-sensitive areas

Country	Number of locations < 500 m	Number of locations 500 m - 10 km
Belgium	1	12
Ireland	1	1
The Netherlands	4	15
United Kingdom	1	4

BAM also assessed its owned construction sites. Usually BAM only operates on sites owned by the client, but in the Netherlands, we have sites that are owned by BAM's property developer. BAM has assessed how many sites are within 1 kilometer of biodiversity-sensitive areas and if they were actively being developed (i.e. consutruction activities). Out of the identified 47 sites, 14 sites were actively being developed in 2025. These are the sites where BAM potentially has the largest impact on biodiversity. Further details on these sites can be found in Overview of owned sites, depots and offices near biodiversity-sensitive areas, together with the details on the relevant offices and depots.

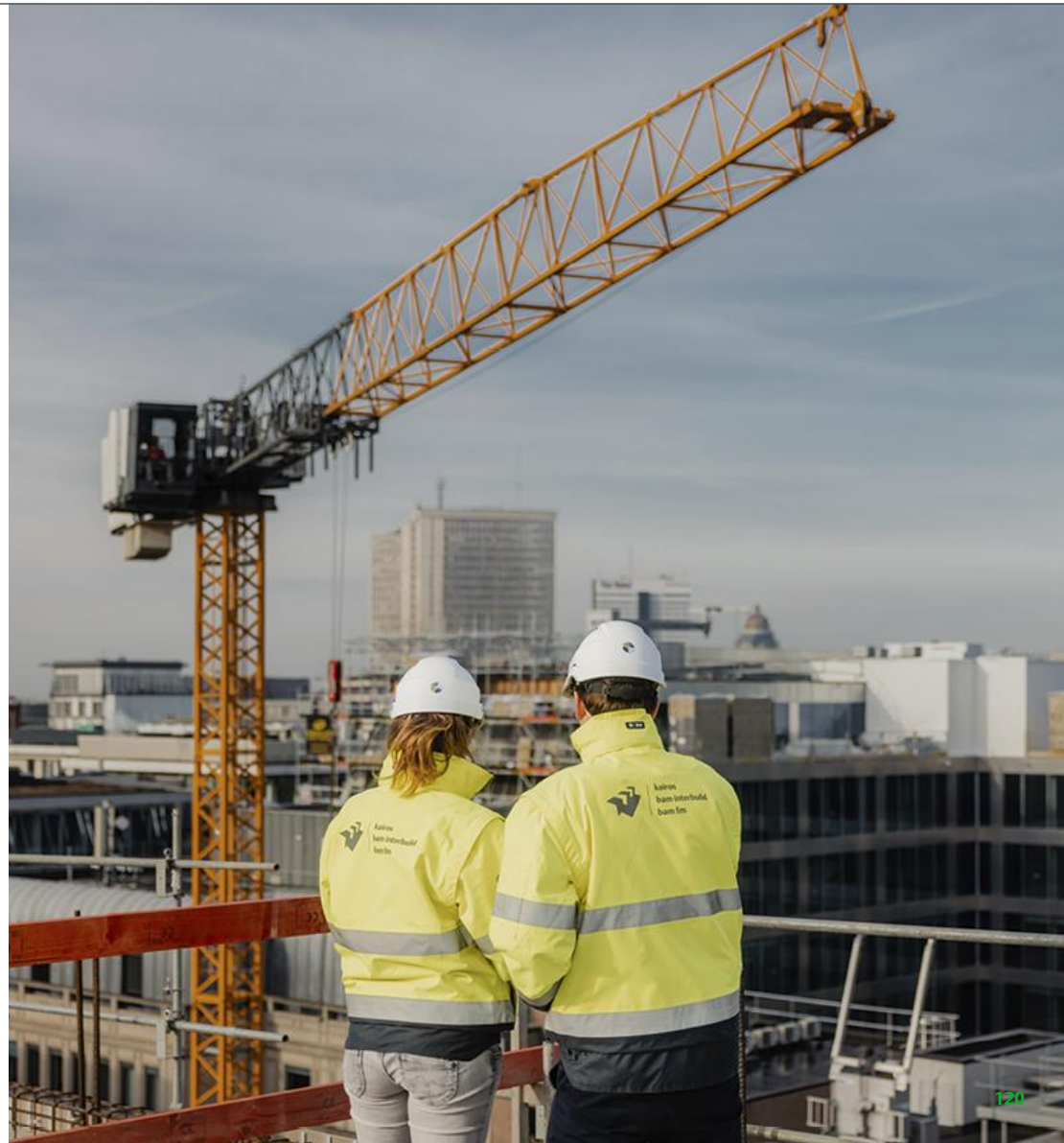
Owned sites near biodiversity-sensitive areas

	Total number of owned sites < 1 km	Number of owned sites with construction activities < 1 km	Number of owned sites 1 km - 10 km
Sites	47	14	12

In total, BAM has identified 21 material sites with potential negative impacts on biodiversity (7 offices/ depots and 14 construction sites that were actively being developed in 2025). On these sites, BAM may contribute to land-use change. The combined area of these 14 sites is approximately 500 hectares, representing the theoretical maximum of hectares subject to biodiversity impact. The actual figure is expected to be significantly lower, as BAM typically develops only part of the land on larger projects.

BAM has not yet performed an individual biodiversity impact assessment for these sites, although offices in the United Kingdom have been assessed. BAM focuses on offering biodiversity enhancing measures to our clients and implement them where possible. Performing individual assessments on the limited number of owned sites provides limited additional value. As no biodiversity impact assessments were conducted at individual site level, BAM cannot provide an exact figure for land-use conversion.

On sites where active development takes place, we promote biodiversity by integrating habitats for a variety of species into our development plans. The goal of the property development part of our business is to leave each area with more flora and fauna species than before development. We select landscape architects based on their biodiversity expertise and work closely with ecologists to monitor the effects of our measures. Various biodiversity measures have been taken, such as the inclusion of bat boxes, swallow boxes, and the creation of mixed hedgerows. Moreover, we have incorporated several hectares of oil flax and elephant grass (Miscanthus) in our projects.



Overview of owned sites, depots and offices near biodiversity-sensitive areas

Country	Location	Address	Size (m2)	Nature area designation	Identified activities
Belgium	Chaudfontaine	Rue Joseph Deflandre 2, 4053	28,807	Vallé D'Ourthe	Depot
Ireland	Cork	T45 R902, Ireland	5,000	Great Island Channel SAC	Office
The Netherlands	Delft	Harnaschpolder	26,104	Natuur Netwerk Nederland	Active development
The Netherlands	Dordrecht	Wilgenwende	347,803	Natuur Netwerk Nederland	Active development
The Netherlands	Gorinchem	Hoog Dalem	5,075	Natuur Netwerk Nederland	Active development
The Netherlands	Haarlemmermeer	Wickevoort	535,196	Natuur Netwerk Nederland	Active development
The Netherlands	Hoef en Haag	Grex omslag	480,870	Natuur Netwerk Nederland	Active development
The Netherlands	Lelystad	De serpeling 120	3,201	Natuur Netwerk Nederland	Office
The Netherlands	Middelharnis	Hernesseroord	63,539	Natuur Netwerk Nederland and N2000	Active development
The Netherlands	Moordrecht	Zuidplaspolder	1,573,030	Natuur Netwerk Nederland	Active development
The Netherlands	Purmerend	Kwadijkerpark	151,909	Natuur Netwerk Nederland and N2000	Active development
The Netherlands	Roermond	Randweg	500	Natuur Netwerk Nederland	Office
The Netherlands	Rosmalen	Vinkeveld	350	Natuur Netwerk Nederland	Office
The Netherlands	Rotterdam (Feyenoord)	Feyenoord-city	5,260	Natuur Netwerk Nederland	Active development
The Netherlands	Rotterdam (Stadionweg)	Stadionweg 23	2,190	Natuur Netwerk Nederland	Office
The Netherlands	Terneuzen (Zuid zuid)	Othene zuid-zuid	341,294	Natuur Netwerk Nederland	Active development
The Netherlands	Terneuzen (Zuid)	Othene zuid	305,105	Natuur Netwerk Nederland and N2000	Active development
The Netherlands	Weesp	Bloemendalerpolder	844,341	Natuur Netwerk Nederland and N2000	Active development
The Netherlands	Zaandam	Saendelft	148,599	Natuur Netwerk Nederland and N2000	Active development
The Netherlands	Zierikzee	Noorderpolder	124,957	Natuur Netwerk Nederland	Active development
United Kingdom	Allbrook	SO50 4 LY	6,500	River Itchen SSSI	Depot

Compared to 2024, our approach to disclosing owned sites, offices, and depots has been refined. Applying the updated 2025 methodology to the 2024 data we see that the number of owned sites near biodiversity sensitive areas remained stable. In 2025, BAM's portfolio included 47 owned sites within 1 kilometer of a biodiversity-sensitive area (2024: 47). Comparing further details with 2024, such as the sites with construction activities or the combined area, is impracticable as this information was not captured for 2024. The number of owned offices and depots within 500 meters of a biodiversity-sensitive area also remained unchanged, totaling 7 in each year.

Reporting principles and assumptions biodiversity

The methodology for the assessment of relevant sites near biodiversity-sensitive areas has two main elements:

1. Determining which sites are in scope.
2. Determining relevant thresholds for proximity.

Scope definition

BAM considers only owned sites as sites where we have full control. Sites where we perform construction activities on behalf of clients and leased offices and depots have been excluded from the disclosure. The assessed sites are all sites where we have (partial) ownership, such as offices, depots and land positions.

Applied thresholds

BAM has defined what distance is considered 'near' biodiversity-sensitive areas in the context of BAM's own operations. The relevant distance depends on local aspects, such as type of habitat and presence of species, and can substantially vary case by case. Although standardised buffer zones may not fully capture specific ecological sensitivities or species-specific impact ranges, which could either under- or overestimate the actual zone of influence for some biodiversity impacts, a practical approach was implemented.

In 2025, BAM applied a different approach to determine the thresholds for proximity compared to previous year. In 2024 we considered the following thresholds to identify a material site: 5 kilometer for international designated sites; and 2 kilometer for nationally designated sites. This year, the thresholds are based on the buffer zone guidance provided by the Integrated Biodiversity Assessment Tool (IBAT). IBAT suggests a buffer zone of 10 kilometers for construction related activities, and considers the following thresholds to determine high significance:

- 1 kilometer for construction activities.
- 500 metres for offices and depots.

A geographic information system (GIS) is used to determine distance to the nearest key biodiversity area. BAM is currently not carrying out a fully location-based mitigation strategy, however, details of the assessment are included in this overview. As the owned asset list is currently compiled partly through manual processes, BAM is working to enhance the completeness of this assessment across all business units.

Description of the processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities (IRO-1)

As disclosed in chapter 6.1 (BAM's Double Materiality Assessment) and in the ESRS E4 SBM-3 analysis above, BAM has screened its business activities in order to identify its actual and potential impact. Based on internal consultations with subject matter experts, and consultations with key parties in BAM's supply chain, the relevant activities have been identified.

Policies related to biodiversity and ecosystems (E4-2)

BAM's sustainability policy references biodiversity but does not include explicit measures for identifying, assessing, managing, or remediating material biodiversity and ecosystem impacts, risks, or dependencies. The current policy is limited to timber, and does not explicitly address production, sourcing, or consumption of ecosystems or other social consequences of biodiversity-related impacts. The policy prescribes to only procure certified renewable timber, reducing the risk of deforestation and forest degradation in BAM's timber supply chain.

BAM will be subject to the EU Deforestation Regulation (EUDR), which has been delayed to 30 December 2026, specifically for the division Netherlands. The original proposal was simplified: Only businesses that are first to place a relevant product on the EU market will be responsible for submitting due diligence statements, and not the operators and traders that subsequently commercialise it. BAM is only importing timber directly for our timber housing factory, so impact on BAM's procurement processes is expected to be limited.

Actions and resources in relation to biodiversity and ecosystems (E4-3)

Biodiversity requirements are part of the stage gate process to support the roll-out of biodiversity enhancing measures in our tenders. All tenders with design in scope are requested to offer biodiversity enhancing measures to the client.

In 2025 BAM continues to offer Biodiversity+ assessments on projects. The assessment is a framework, bridging regulatory and science-based methodology with BAM's operations. By offering the assessment BAM aims to add value that complements societal and client needs. Priority is on user-friendliness, by distilling complex jargon into understandable and practical principles. We carried out 79 Biodiversity+ assessments (62 in division United Kingdom and Ireland and 17 in division The Netherlands) in 2025. The Biodiversity+ assessments provide useful insights in the nature related risks and opportunities of our projects.

Across BAM's business wider development of the theme is ongoing, the focus is on a learning and development approach. An e-learning, tailored to the role and involvement at different project stages, has been published. The project stages are tenders, design and execution. Furthermore, across the company best practices of biodiversity enhancing measures are shared through a sustainability library.

We do not currently apply biodiversity offsetting. Our initial focus is on gaining insight into our impacts and taking steps to reduce negative effects. Focus is on continuing efforts to improve biodiversity related data management systems and increase insights into biodiversity impacts on projects. Through engagement with all relevant stakeholders, both internally and externally, BAM aims to mitigate negative impacts, while increasing biodiversity action-based value creation on its projects.

Targets related to biodiversity and ecosystems (E4-4)

BAM has included biodiversity in its strategy and has set the target to offer biodiversity enhancing measures in A,B,C tenders with design in scope in 2026. Furthermore, BAM has the ambition to work towards a biodiversity positive impact by 2030. The offering of biodiversity enhancing measures is the first step to address biodiversity risks and opportunities in our projects. To reach the 2030 ambition, more tangible targets covering all aspects of our biodiversity impact will be needed.

BAM has set targets in line with the Kunming-Montreal Global Biodiversity Framework. We believe that by contributing to these targets BAM provides support for the transition towards a nature inclusive and biodiverse construction sector. BAM did not apply ecological thresholds when setting these targets. For our targets on biodiversity balanced and biodiversity positive, BAM anticipated to use the United Kingdom Biodiversity Net Gain (BNG) approach developed by the British Government to use as the metric to report biodiversity impact. However, aggregating BNG impacts across different projects is complex and applying BNG on all projects turned out to be infeasible. Therefore, BAM has dropped its 2026 target on evidenced biodiversity balanced in the division United Kingdom and Ireland.

BAM's Biodiversity+ assessment covers drivers other than BNG, such as pollution and invasive species. BAM is currently rephrasing the 2030 ambition on biodiversity positive impact, expanding the scope to nature impact but making our efforts more specific. Our efforts focus on:

- Minimising negative impacts in the supply chain.
- Protecting nature during construction phase.
- Restoring and enhancing nature through assets we deliver.

In 2026, we plan to finalise new specific nature targets for 2030, where we consider to set specific targets addressing our key impacts at construction sites and our lasting impact when we finalise projects. Our upstream impact is also in scope but concrete targets are not yet expected to be formulated in 2026.

Impact metrics related to biodiversity and ecosystems (E4-5)

BAM has incorporated the offering of biodiversity-enhancing measures into its sustainability baseline. In 2025, we offered measures in 84% of our large tenders with design in scope. 2025 was the first year that BAM was able to provide consolidated figures and marks an important milestone towards ensuring a 100% score on this metric in 2026.

Resource use and circular economy (ESRS E5)

A circular economy is an economic system designed to keep the value of products, materials, and resources in use for as long as possible. It promotes efficient production and consumption, reduces environmental impact, and minimises waste and hazardous substances throughout the entire lifecycle - guided by the waste hierarchy. The goal is to maximise the value of technical and biological resources by enabling durability, reuse, refurbishment, and recycling.

BAM focuses on the reduction of non-biobased virgin materials. Specifically, the focus is on reducing the consumption of primary materials such as concrete, steel, and asphalt, known for their substantial environmental impact. BAM aims to replace these with bio-based alternatives or secondary materials that are reused or recycled.

Waste management has been part of BAM's operations for many years. Waste is categorised into four categories: construction, office, excavation, and demolition. BAM has direct influence over construction and office waste, which are materials brought to construction sites and products used in offices. These streams are the current focus of BAM's waste reduction targets.

BAM also embeds circular principles in its designs. By developing buildings and infrastructure that apply circular practices, BAM contributes to a system where resources are used efficiently and sustainably.

Disclosures are related to the following material impacts, risks and opportunities as identified through BAM's double materiality assessment process, refer to full details in chapter 6.1.

E5 Resource use and circular economy

Material impact, risk or opportunity		
Resource use		
Depletion of raw materials	(VC upstream)	Negative impact
Waste reduction (hazardous and non-hazardous waste)	(OO)	Negative impact
Waste re-use and recycling	(OO)	Positive impact
Resource use		
Circular design	(OO)	Positive impact

The disclosures in this section should be read in conjunction with the disclosures in chapter 6.2 on Impact, risk and opportunity management.

Description of the processes to identify and assess material resource use and circular economy–related impacts, risks and opportunities (IRO-1)

In 2024, BAM has screened its business activities in order to identify its actual and potential impact. Based on internal consultations with subject matter experts, and consultations with key parties in BAM's supply chain, the relevant activities have been identified. BAM further discloses the assumptions and tools used in the impact assessment (see chapter 6.1).

Policies related to resource use and circular economy (E5-1)

BAM's ability to meet its sustainability ambition related to resource use and circular economy is driven by the organisation's responsibilities described in the sustainability policy:

- Make efficient use of resources (such as energy and water).
- Optimise design to minimise the amount of materials used.
- Consider the use of sustainable alternatives to conventional building materials, such as biobased (timber) and recycled materials. And only procure 100% certified sustainable timber.
- Avoid waste of materials and separate remaining waste streams.
- Support the use of materials passports and circularity assessment on projects.

The policy addresses both the standards for BAM's own operations as well as relevant criteria for the selection of suppliers. It includes that BAM ensures that subcontractors and suppliers have relevant sustainability policies in place and adhere to any prescriptive (project) sustainability requirements to meet compliance with this policy or any client sustainability requirements and ensures subcontractor and supplier compliance with relevant environmental protection laws and regulations.

Actions and resources related to resource use and circular economy (E5-2)

Application of circular business practices are evidenced by the development of BAM's wooden housing concept Flow. Flow also showcases higher levels of resource efficiency in use of industrialisation and biological materials (timber). Another example that evidences BAM's contribution a circular economy is the development of cold-use asphalt in BAM's Dutch infrastructure business activities.

Initiatives in 2025 also focused on the innovative solutions to reduce waste. In division Netherlands for example, this is done with other partners to develop a biobased fire protection board made from recycled timber waste. Another example is the using of what would be concrete waste to create flexible gryones place on river sides to minimise erosion. In division United Kingdom and Ireland, a plan to reduce waste accumulated at the end of the project has been developed to re-use waste throughout the duration of the project.

Furthermore regarding material use, BAM's aim was to establish a baseline and reduction path for the largest material categories in 2025, which will continue in 2026. For steel, a draft roadmap has been finalised, for concrete and timber work is still in progress.

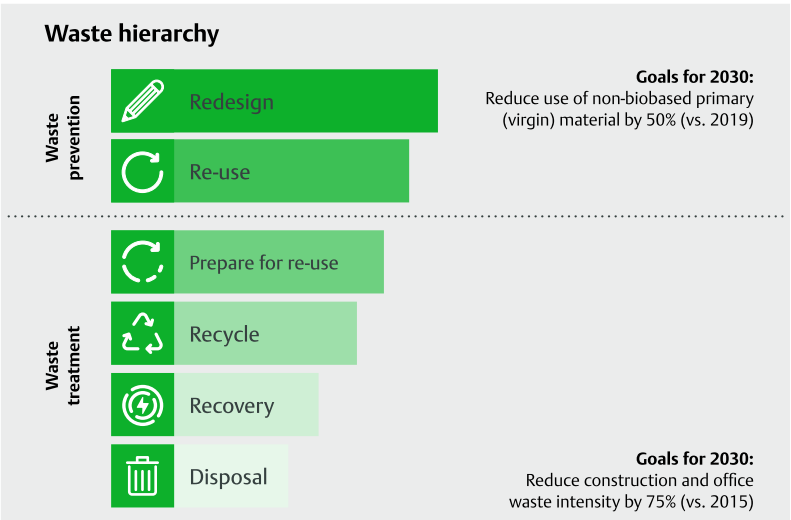
All actions and initiatives as described above are a part of BAM's ongoing operations and therefore have no additional financial resources allocated from either Capex or Opex.

Targets related to resource use and circular economy (E5-3)

As part of BAM's long term strategy, the following targets are set linked to the increase of circular project design:

- 2030: A, B, C and industrialised projects with design in their scope to use the material passport
- 2030: A, B, C and industrialised projects with design in their scope to use the circularity assessment

In relation to the waste hierarchy, BAM's targets to the minimise primary raw materials and use renewable resources are:



BAM tracks construction and office waste performance against a 2015 baseline established using the respective financial consolidation. This included business activities that were divested after 2015, whereas current-year reporting excludes divested businesses from the reporting scope. Since the targets are intensity-based (tonnes of waste per € million revenue), not reinstating the 2015 baseline for divestments has limited impact. The targets presented are voluntary and not required by legislation. The reduced use of non-biobased primary material prompts the use of biobased materials (e.g. timber and straw insulation). BAM has considered how this may impact biodiversity loss, also in light of Biodiversity (ESRS E4). Sustainable sourcing is a key element in BAM's strategic approach to (biobased) material use. In the paragraph below and in Biodiversity (ESRS E4) BAM discloses the assessment and potential negative impacts of (biobased) material use.

Resource inflows (E5-4)

Resource depletion is the exhaustion of raw materials within a region. Resources are commonly divided between renewable resources and non-renewable resources. Use of either of these forms of resources beyond their rate of replacement is considered to be resource depletion. BAM has a negative impact by direct resource use on the environment and people; depending on how and where the resources are sourced, as well as how BAM uses them. For example, if BAM sources its materials unsustainably or in a way that causes pollution or habitat destruction, it can have a negative impact on the environment and local communities.

Assessing BAM's resource inflows, it mainly concerns materials used within BAM's own operations and along its upstream value chain. Key raw materials for BAM are (ready-mix) concrete, timber, asphalt and steel.

BAM reports the amount of materials used and the recycled content of these materials used. Specifically for timber (biological material), the percentage of sustainable sourcing is disclosed, see 99.8.

Reporting principles and assumptions primary materials (resource inflows)

BAM uses multiple methods of collecting data for the usage of materials:

- measured data – based on suppliers' reports, specifications from invoices or any other method where the quantities of materials are being physically measured;
- calculated data – based on the cost of the materials and average price per unit of the material;
- estimated data – if measuring or calculation is not possible due to limited information, it is possible to estimate the quantities of materials by applying a specific ratio.

Material consumption is determined using supplier reports when available. This data is extrapolated to cover all suppliers. For the remainder of the material use a spend based approach is used, which results in high estimation uncertainty for this specific information. The results are verified against BAM's procurement data, and with BAM's internal and external experts. The recycled content was determined based on information provided by suppliers and industry averages.

Asphalt: High reliability - dashboarding with integration to supplier data (cumulative).
Timber: Medium reliability - supplier reports available, extrapolated based on spend.
Concrete: Limited reliability - partial supplier reports available, largely extrapolated based on spend.
Steel: Limited reliability - partial supplier reports available, largely extrapolated based on spend.

The basic reporting unit for timber and concrete is set to cubic meters. For asphalt and steel BAM reports in tonnes. Sustainable timber has been classified in several categories: FSC 100%, FSC mix, PEFC mix, other certificates and not certified.

Material consumption

(in tonnes)	2024	2025
Ready mix concrete	**1,436,602**	**1,659,266**
of which: recycled content	39,658	68,494
of which: % recycled content	2.8	4.1
Asphalt	**653,978**	**703,384**
of which: recycled content	195,374	216,575
of which: % recycled content	29.9	30.8
Steel	**167,176**	**163,852**
of which: recycled content	112,531	110,526
of which: % recycled content	67.3	67.5
Timber	**15,759**	**25,024**
Certified sustainable timber		
Sustainable timber (in % of total timber)	99.2	99.8
Organisational coverage (in %)	93	91
Total weight of materials	**2,273,515**	**2,551,526**
Total weight of recycled materials	**347,563**	**395,595**

The 2024 ready mix concrete has been restated to correct for a prior period error as data on pre-fabricated concrete for division Netherlands was unintentionally left out of the calculation. This is discussed further in chapter 6.2 Changes in preparation of sustainability information and reporting of prior period errors.

Timber plays a crucial role in minimising the use of non-biobased materials. BAM has committed to using only certified sustainable timber for its projects, as part of its agreement with FSC Netherlands.

BAM achieved a certified sustainable timber use of 99.8% in 2025 (99.2% in 2024) for its projects in division Netherlands and United Kingdom.

The organisational coverage is 91% (93% in 2024), as timber use in Ireland is not included. Insufficient documentation from suppliers to evidence certification and market conditions continue to make it very challenging to procure sustainable certified timber in Ireland.

Resource outflows (E5-5)

BAM has identified two specific impacts from BAM's activities related to resource outflows: a positive impact on circular economy through BAM's design process, and negative impacts due to waste generation in BAM's activities.

BAM sees a material positive short term impact to make use of circular design principles which involves designing products, services, and systems that are sustainable throughout their life cycle, maximizing the use of renewable resources, and creating closed-loop systems for the continuous cycling of materials and resources, e.g. design for disassembly.

Circularity in tenders (in %)

	2024	2025	Target 2030
A and B tenders with circularity assessments	71	69	100
A, B and C tenders with circularity assessments	-	58	100
A and B tenders with material passports	63	69	100
A, B and C tenders with material passports	-	55	100

To design according to circular principles, BAM includes a circularity assessment (for example Building Circularity Index (BCI) in the Netherlands) and makes material passports in most of the project offers (e.g. tenders), even if those elements are not explicitly requested by the client. The circularity assessment can support decision-making about which circular design principles to implement in the design phase of a project and provides insight into the extent to which a building uses recycled materials and into the reusability and detachability of materials used. In the material passport the materials used in the end product are documented, enhancing repairability, disassembly, and planning for re-use and recycling at the end of the product lifecycle.

BAM identified an entity-specific metric for the offering of those circularity measures in new projects. In order to achieve BAM's 2030 target, progress is steered towards 50% of A and B tenders with circularity assessments and material passports in 2024 for division Netherlands, and 50% of A and B tenders with circularity assessments and material passports in 2026 for division United Kingdom and Ireland. In 2025 BAM is already ahead of those targets in both divisions, refer to the table Circularity in tenders, and continues to increase the level of circularity assessments in the project offering in the coming years.

BAM's waste has negative impacts on the environment and human health, including pollution of air and water, greenhouse gas emissions, and the spread of disease. Improper disposal of hazardous waste can also lead to soil and water contamination and harm to wildlife.

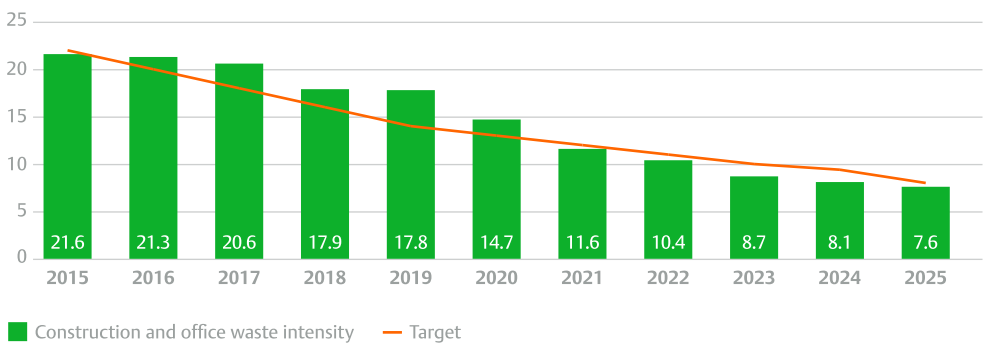
Waste reduction (hazardous and non-hazardous waste) is aiming at eliminating waste over the life-cycle of BAM's developments. Waste reduction refers to practices that minimise waste generation, decrease environmental impact, and conserve resources by reducing the amount of raw materials needed to produce goods and services (see resource inflow), and by reusing or recycling waste materials.

In the approach for waste reduction and waste reuse and recycling BAM makes a split between hazardous waste and non-hazardous waste. Specifically because actions like increasing recycling rates, reducing packaging waste, or promoting reuse initiatives are only applicable for non-hazardous waste. Hazardous waste according to ESRS is defined in line with the EU Directive on waste (Annex III of Directive 2008/98/EC).

In 2025 BAM generated a total amount of waste of 1,260.3 kilotonnes (940 kilotonnes in 2024). For a further breakdown between hazardous waste and non-hazardous waste and a breakdown by recovery operation types and waste treatment types, refer to the table in this section. Total amount of hazardous waste in 2025 is 33.8 kilotonnes (47.3 kilotonnes in 2024), of which none radioactive. For examples on materials present in the hazardous waste, refer to the table in this section.

BAM's construction and office waste intensity in 2025 was 7.6 tonnes per € million revenue (8.1 in 2024), 53.7 kilotonnes in absolute numbers (52.3 in 2024). Progress is in line with the long term trajectory to reduce 75% of construction and office waste by 2030 (64.8% reduction in 2025 versus 2015). Waste re-use repurposes discarded materials or products to reduce waste generation, while recycling converts waste materials into new products or materials, minimizing the environmental impact of waste disposal. BAM's positive impact caused by waste recycling can reduce landfill waste. Re-use is not included as part of BAM's waste (construction and office waste intensity).

Trendline waste (intensity)



The total percentage of non-recycled waste was 18% in 2025 (41% in 2024). Specific for construction and office waste the percentage was 15.8% in 2025 (22% in 2024). This information also supports the information needs with regard to the EU Taxonomy as reported in chapter 6.6. BAM's waste diverted from landfill in 2025 was 11% (22% in 2024).

Reporting principles and assumptions waste

The reporting scope of waste includes all waste leaving BAM's sites and offices. Reported waste is mainly based on waste tickets and data provided by suppliers. Reported waste is either measured, calculated or estimated using methods and input data based on BAM's experience in comparable works. Excavation waste and demolition waste have a total direct measurement of 99% and construction and office waste of 93%.

Construction and office waste consists of temporary and permanent construction and other materials and packaging brought on to sites which are to be discarded and subsequently leave offices, construction sites and/or BAM sites such as depots or premises. Waste is retrieved and processed by third-party waste processors. BAM relies on these processors to adhere to (local) legislations stating that the waste needs to be disposed of in a responsible way.

Data is retrieved from waste recycling reports from the waste facility, certificate of destruction, paper confidential shredding or waste transfer notes, type of waste permit / licence location sent states recycling facility (when removed off site) or demolition reports. Limited data is available for the category prepared for re-use, hence BAM uses a conservative approach in classification, i.e., if evidence is missing waste will be reported as recycled in stead of prepared for re-use. Waste will only be reported in a single category, to avoid double counting.

BAM also reports on the 'reuse' amount. This is not included as waste.

Waste reporting does not include subcontractors in 'own operations', with the exception of waste numbers for division United Kingdom and Ireland, as this is recognised legally (this implies specific legal rights and obligations).

Waste

(in kilotonnes)	2019 base year	2024	2025	Composition of waste (examples)
Office waste	**4.9**	**2.6**	**2.5**	
of which: hazardous waste	-	-	-	
- prepared for reuse	-	-	-	
- recycled	-	-	-	
- incineration	-	-	-	
- landfill	-	-	-	
of which: non-hazardous waste	-	2.6	2.5	
- prepared for reuse	-	-	-	
- recycled	-	0.9	1.0	Paper, cardboard, metal, coffee grounds
- incineration	-	1.7	1.5	Food garbage, plastics, municipal waste
- landfill	-	-	-	
of which: reuse	-	-	-	
Construction waste	**122.6**	**49.7**	**51.2**	
of which: hazardous waste	-	0.2	0.7	
- prepared for reuse	-	-	-	
- recycled	-	0.1	0.5	Dead batteries, empty spray cans
- incineration	-	-	-	
- landfill	-	0.1	0.2	
- other disposal operations		-	-	
of which: non-hazardous waste	-	49.5	50.5	
- prepared for reuse	-	1.4	1.5	Glass wool insulation
- recycled	-	39.7	43.7	Concrete surplus, metals packaging skips
- incineration	-	6.1	4.0	
- landfill	-	2.2	1.3	
of which: reuse	-	-	-	Pallet, fence, construction materials

(in kilotonnes)	2019 base year	2024	2025	Target 2030
Total construction and office waste	127.5	52.3	53.7	
Total construction and office waste intensity (in tonnes per € million)	17.7	8.1	7.6	5.4
Total excavation and demolition waste	3,191.0	887.3	1,206.6	
Total waste	3,318.5	939.6	1,260.3	

(in kilotonnes)	2019 base year	2024	2025	Composition of waste (examples)
Excavation waste	**2,664.9**	**785.5**	**1,112.4**	
of which: hazardous waste	-	44.1	16.3	
- prepared for reuse	-	0.4	0.1	Contaminated soil
- recycled	-	19.4	8.5	
- incineration	-	1.2	1.1	Contaminated invasive plants
- landfill	-	23.1	6.6	Contaminated soils, bitumen with coal tar
of which: non-hazardous waste	-	741.4	1,096.1	
- prepared for reuse	-	153.2	69.0	Soil; excavation
- recycled	-	412.4	909.7	Concrete foundations and pipework
- incineration	-	1.5	1.3	
- landfill	-	174.3	116.1	Soils sent to landfill for capping
of which: reuse	-	-		
Demolition waste	**526.1**	**101.8**	**94.2**	
of which: hazardous waste	-	3.0	16.8	
- prepared for reuse	-	0.3	-	Impregnated window frame
- recycled	-	0.4	1.7	Bitumen with coal tar, TL lighting
- incineration	-	0.1	0.1	Impregnated timber
- landfill	-	0.6	15.0	Asbestos
- other disposal operations		1.6	-	
of which: non-hazardous waste	-	98.8	77.4	
- prepared for reuse	-	6.0	7.0	Doors, stored on depot or sold to broker
- recycled	-	83.5	68.2	Window glazing, concrete debris, timber
- incineration	-	0.9	0.7	
- landfill	-	8.4	1.5	Doors, furniture, carpet, flooring materials
of which: reuse	-	-	-	

Story

Joe McBride

project manager

“I’m a project manager, working on energy transmission schemes across Scotland. The work is all about increasing transmission capacity so more renewable energy can connect to the grid and get to where it’s needed. I joined BAM as a site engineer, and nearly 13 years on I’m still working on energy transmission, though in a very different role.

Most of my projects over the past decade have been for Scottish and Southern Electricity Networks, one of our key clients. Those long-term relationships make a big difference. Because you’re not just parachuting in and out of jobs, you build trust, which changes how projects are delivered. A lot of the work is in remote locations. We’re talking forests, mountains, places you wouldn’t expect to be building major infrastructure. You might be constructing a bridge, miles from anywhere, to carry a 400-tonne transformer. The logistics alone can be a challenge, but that’s part of what makes it interesting.

The other thing is that this work feels meaningful. I came into civil engineering to leave a positive legacy, and energy infrastructure really does that. It’s not just about building something and moving on; it’s about enabling the transition to renewables and supporting communities long-term. That lines up well with BAM’s focus on building a sustainable future, and it feels genuine. It’s reflected in the types of projects we choose to work on and the clients we align ourselves with.

For me, the BAM value of ‘Inclusive’ comes down to everyday behaviour on site. It’s how people are spoken to, how decisions are made, and whether everyone feels able to contribute. Teams are far more diverse than when I started, and that’s good, because you get different perspectives, fewer blind spots and better solutions.

I try to create an environment where people feel comfortable speaking up and taking ownership. When that happens, communication improves, safety improves, conflicts are easier to resolve and you get better outcomes.”

Inclusive

I try to **create an environment** where people feel comfortable speaking up and taking ownership.”

Our values

Sustainable

- **Inclusive**

Reliable

Ownership

Collaborative

6.4 Social information

Own workforce (ESRS S1)

BAM aims to have a positive impact on all employees working at the company by building an inclusive environment in which everyone feels safe, welcome and respected, and ensuring equal opportunities for people regardless of sex and gender identity, age, ethnicity, disability or other characteristics.

Promoting fairness and reducing discrimination fosters higher levels of employee engagement within BAM. Practicing non-discrimination has a positive impact on employees as it can ensure fair treatment and opportunities for every individual, regardless of identity. It also positively impacts the communities in which BAM operates by ensuring the company's projects reflect the diverse needs and values of society. Focus on gender diversity positively impacts the representation of women in leadership positions in the sector.

BAM positively impacts its own employees and contributes to a safe, sustainable and just society by offering every employee the opportunity to grow their skills with unparalleled learning opportunities. This positively impacts every individual by ensuring they can build sustainable careers through constructive performance evaluations and development opportunities. By levelling-up its employees, BAM stays at the forefront of innovation, sustainability and safety. This can have a positive impact on the natural environment by enabling employees to implement more sustainable practices where they live and work.

BAM's values (Sustainable, Inclusive, Reliable, Ownership and Collaborative) form the basis of its corporate culture. The positive impact of BAM's corporate culture includes commitment to living these values in its daily practices, to ethical and sustainable business practices, and to enhanced reputation.

Working in the construction sector in general has a negative impact on occupational health and safety, as attested to by the existence of work-related injuries resulting in death and days away from work for those in the industry who work on building sites, for example. Working in the construction industry can expose workers to a variety of hazards that can cause long-term health effects.

Disclosures are related to the following material impacts, risks and opportunities, as identified through BAM's double materiality assessment process. For the full details see chapter 6.1.

Material impact, risk or opportunity		
Equal treatment and opportunities		
Diversity	(OE)	Positive impact
Return on inclusion	(OE)	Positive impact
Training and skills development	(OE)	Positive impact
Occupational health and safety		
Occupational health and safety	(OW)	Negative impact
Work-related ill health long term effect	(OE)	Negative impact

The disclosures in this section should be read in conjunction with the disclosures in chapter 6.2 on Governance, Strategy, and Impact, risk and opportunity management. Further disclosures incorporated by reference are:

Disclosure requirement	Reference to other chapters in the 2025 Annual report
ESRS Standards: General disclosure (ESRS 2)	
SBM-3	Description of the key elements of BAM's strategy that relate to or impact sustainability matters, as well as a description of the key elements of BAM's business model and the resilience of BAM's strategy and business model regarding its capacity to address its impacts, risks and opportunities in chapter 2.5 How we create value for society.

Interests and views of stakeholders (SBM-2)

BAM's own workforce is a key group of affected stakeholders. BAM integrates the interests, views and rights of its employees into its strategy and business model by maintaining structured employee engagement channels, regular surveys and feedback sessions.

The company actively involves its own employees in strategy setting and, for example, risk assessment processes. Through its Works Councils, with representatives from across the business, BAM involves its own employees in discussions about organisational changes and other employee-related matters.

Material impacts, risks and opportunities and the interaction with the strategy and business model (SBM-3)

All material impacts with regard to the own workforce (refer to table 'Own Workforce' and chapter 6.1) are closely connected to BAM's strategy and business model. Examples include the impacts related to occupational health and safety and to training and skills development. The defined strategy, policies and underlying actions and measures are designed to manage and inform management on progress, and results are taken into account when adapting the business model.

Any impacts on BAM's own workforce that arise from transition plans to reduce negative impacts on the environment and to achieve greener and climate-neutral operations are not considered material, although opportunities do arise from job creation and reskilling and upskilling, such as in those related to further developing BAM's timber housing concept.

Policies related to own workforce (S1-1)

BAM's policies to manage its material impacts on its own workforce aimto identify, assess, manage and/or remediate the negative impacts and contribute to increase the positive impacts.

The company's diversity and inclusion policy states that it will create a truly inclusive culture that is mirrored throughout all aspects of its business, infrastructure, supply chain and technology. Inclusion refers to the organisation's ability to create a culture in which every employee feels valued and respected, ensuring equal opportunities for employees regardless of their identity and diversity traits. Diversity concerns all aspects and personal characteristics in which people may differ, including sex and gender identity, age, ethnicity, disability and sexual orientation.

BAM is committed to putting its employees' health (including mental health) and wellbeing at the heart of its approach and creating a psychologically safe environment for its employees to do their best work. The company measures the pay gap and removes any bias from its compensation and reward strategies by, for example, implementing a harmonised job grading framework. BAM will not tolerate discrimination, bullying and/or harassment and encourages employees to speak up where this is witnessed, experienced or reported.

The company's health and safety policy states that it regards the health, safety and welfare of its own workforce to be of the utmost importance and essential to the successful running of the business. BAM will do everything in its power to comply with all relevant legislation and provide adequate finances and time to develop the culture. Safety is also an important element in BAM's sustainability policy. This states that unsafe behaviour must be addressed, and unsafe working conditions reported to the compliance manager or (anonymously) via the Speak Up process. All safety incidents shall be reported in line with instructions. Safety instructions apply to all BAM employees and all non-employees working on a site managed by BAM.

BAM is committed to ensuring that its employees have the knowledge and skills to do their best work, and that its training provision is inclusive and accessible to all. BAM's HR Perform & Develop policy clarifies the process by which managers of BAM work together with employees to plan and review their performance and development and their overall contribution to BAM's success. The policy helps to identify individual talents and strengths and helps employees reach their full potential. BAM wants to ensure a fair and consistent approach to how employees are recognised and rewarded for their team and individual contributions. BAM recognises and develops the talents of all employees in the organisation. The company wants to create a learning culture and growth mindset, and provide opportunities for all employees to fully develop and apply their talents.

Human rights is treated as an overarching theme, covering all topics mentioned above. The different policies address safety, health and inclusion, and social value, outlining clear requirements. The code of conduct describes the way BAM respects human rights and what it expects from employees in that respect. In the diversity and inclusion policy, BAM further outlines its norms and values on diversity and inclusion. Supported by these policies, BAM is protecting and upholding human rights to build strong and inclusive communities. BAM has strengthened its approach to this topic by issuing Group-wide guidance on human rights.

In strengthening human rights' policies and procedures, BAM is guided by the standards established in the Universal Declaration of Human Rights, the Corporate Responsibility to Respect Human Rights under the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises. BAM also recognises and respects the ILO Declaration on Fundamental Principles and Rights at Work, the ILO Conventions in force and the ILO Tripartite Declaration of Principles concerning multinational enterprises and social policy (MNE declaration). BAM complies with the Minimum Safeguards from the EU

Taxonomy. BAM aligns with these standards and demonstrates this in its code of conduct, vendor code of conduct, human rights guideline and other underlying policies, such as its sustainability policy and procurement policy. For Human Rights Due Diligence, BAM performed a deep dive risk analysis on potential Human Rights Risks to understand and mitigate the human rights risks within the company's own workforce and vendors (suppliers and subcontractors).

In its approach, BAM focuses on efforts and actions to mitigate human rights risks in the following areas:

- Continuous assessment of human rights risks;
- Performing third-party risks due diligence;
- Training and engaging BAM employees and vendors;
- Industry engagement;
- Monitoring incidents and complaints handling.

We closely monitor training participation by gender to ensure equal access to development across our company. Differences in average training hours between men and women are driven primarily by role profiles and mandatory training requirements linked to those roles, rather than unequal access to learning. To ensure fairness, all employees have equal access to learning resources, including StudyTube and personalised development planning, with 96% of employees completing the People & Development section of our performance cycle. We also proactively monitor participation in formal development programmes to identify and address potential blind spots in nominations, ensuring opportunities are distributed equitably and aligned to company needs.

Processes for engaging with own workforce and workers' representatives about impacts (S1-2)

Under the responsibility of the CHRO, BAM conducts an engagement survey of its own employees three times per year. Managers have access to the anonymised scores and feedback from their team. They are encouraged to discuss the results and take action with their team to address the concerns or opportunities that are raised. The results of the survey are reported to the Executive Committee. Scores are compared to previous surveys and against external benchmarks to measure the effectiveness of the actions being taken. Informal interactions between non-employees and project managers about, for example, occupational health and safety impacts, do take place at sites.

Processes to remediate negative impacts and channels for own workforce to raise concerns (S1-3)

BAM's Speak Up procedure describes how the workforce and other stakeholders can raise their concerns and describes the process of how reports will be addressed. There is also an external Speak Up service, at www.speakupfeedback.eu/web/bam. This is available 24 hours a day, seven days a week. BAM has an official investigation procedure in place that describes if and how reported incidents will be investigated and followed up. Although BAM does not systematically assesses awareness and trust in these mechanisms, awareness about BAM's Speak Up process is raised and people are invited to voice concerns.

The same procedure applies for specific negative impacts on safety, in addition to the official safety incident registration procedure. BAM has standards across the business for the reporting of incidents, investigation procedures and instructions, depending on the nature of the incident. For example, the composition of investigation teams depends on the severity of the incident, but consists of, at a minimum, a health and safety professional. Depending on the nature of the incident, specialist assistance can be sought by the investigating team. This can be internal or external. Communication, corrective actions and the prevention of recurrences of significant incidents are the responsibility of BAM's directors of Occupational Health and Safety.

BAM's code of conduct calls on BAM's workforce to never put health and safety aside to get a job done, and to stop an activity that is unsafe or could result in an unsafe situation. Employees, non-employees and other (external) parties can report environmental, health and safety issues to their line manager or compliance officer, or via the Speak Up process. Workers are protected against reprisals because reports can be made to the compliance officer outside the project team or anonymously (if desired) via the Speak Up process. Following the code of conduct, retaliation – whether direct or indirect – against employees who raise a concern may result in disciplinary action up to and including dismissal.

Action-taking on material impacts on own workforce, approaches to managing material risks and the effectiveness of those actions (S1-4)

The BAM Experience (chapter 2.6) aims to offer all employees an attractive employee experience that is tailored to their needs. Dedicated centres of excellence are working on a daily basis to deliver the BAM Experience. These centres of excellence cover the areas of talent acquisition, talent management and learning, diversity and inclusion and compensation and benefits.

Progress and actions taken in these areas in 2025 include, but are not limited to, completing the rollout of strategic workforce planning across the business and translating the insights to a prioritised set of interventions to address key challenges, upskilling recruiters and hiring managers in inclusive recruitment, strengthening talent dialogues and succession pipelines, and launching the conscious leadership journey to drive cultural and behavioural change. The themes that will be focused on in 2026 include, but are not limited to, attracting more graduates to early career roles, increasing internal mobility, managing attrition, upskilling managers in driving development conversations and streamlining the learning curriculum to conscious leadership.

The effectiveness of these initiatives is assessed and tracked via the employee engagement survey (see S1-2) and the strategic people metrics (see S1-5).

Over the past year, we advanced our occupational health and safety performance through several key initiatives. We launched a Group-wide safety programme, forming the basis for BAM's six Life Saving Rules, eight Safety Principles and Group Safety Standards. In addition, we strengthened our safety reporting, management and investigation systems across the organisation. We also introduced a mandatory e-learning course for all employees and developed 'toolbox talks' to support our on-site operatives in working safely every day.

To address long-term work-related ill health, we offered webinars through the Vitality House and delivered sessions within the Safe and Well programme, covering themes such as work–life balance and mental health.

Targets related to managing material negative impacts and advancing positive impacts (S1-5)

BAM has defined strategic people metrics to manage its material impacts on BAM's own workforce. Several metrics, such as turnover, absenteeism and action-taking, are tracked internally with no specific targets. These metrics are forecast, based on trends, to gain insight into the effectiveness of actions taken, and to ensure BAM remains within expected parameters and can identify when it goes out of the normal range. These metrics are reported to the Executive Committee on a quarterly basis in the management report. Following the interim year of 2025, the company is entering the next phase of targeted objectives scheduled for 2026 and 2030 (chapter 3.2).

Characteristics of BAM's employees (S1-6)

Insights into the general characteristics of the employees in BAM's own workforce provide contextual information that aids an understanding of the information reported in other disclosures in this chapter. It assists in providing insight into BAM's approach to employment, including the scope and nature of impacts arising from BAM's employment practices. BAM recognises the importance of extending its strategy to its workforce and knows that data optimisation is required to do so effectively. The data presented in this chapter is used to further manage the social performance of BAM.

The total number of employees is 14,167 as at 31 December 2025. The geographic distribution of employees is included to show regional differences within the workforce. A breakdown by genders is provided as part of BAM's diversity disclosures. The breakdown by contract type provides insight into the structure of the company's workforce. The information reported in these tables is correlated to the personnel expenses, as reported in note 7 in the financial statements.

Reporting principles and assumptions - own workforce

BAM's own workforce includes both people who are in an employment relationship with the undertaking ('employees') and non-employees who are either people with contracts with BAM to supply labour and people provided by subcontractors primarily engaged in employment activities. The last category also includes all workers on BAM-led construction sites. The information disclosed with regard to non-employees does not affect their status with regard to applicable labour law. The disclosures do not cover other workers in the value chain.

Own employees are active BAM employees with an employment relationship. A BAM employment contract is defined as an employment agreement with a BAM subsidiary. For example:

- Regular employees (operative hourly, operative salaried, staff salaried, staff hourly)
- Trainees (including apprentices, graduates)
- Persons on Global Assignment to other BAM entities (home record)

Non-employees are personnel working for a BAM subsidiary or joint arrangement and directly supervised by BAM but not under a BAM employment contract , for example:

- Students (Internship)
- Contingent Workers, such as individuals leased from agencies (agency workers), self-employed persons (independent contractors)
- Subcontractors supervised by BAM

BAM has scoped its reporting boundaries related to the own workforce to the extent that subcontractors who are working on a BAM-managed site (directly supervised by BAM) and subcontractors working for BAM's joint operation partners or joint venture partners are not taken into account for the reporting in own workforce.

Tier-N vendors (indirect suppliers) and non-contracted individuals (i.e., site inspectors) are not part of BAM's own workforce. Members of the public, e.g. visitors, bystanders and other road users, are thirds and not included in the reported numbers, unless explicitly mentioned.

BAM uses a single cross-divisional core HR system that supports most HR processes and reports using standardised data. In addition, BAM has implemented a reporting solution that offers internationally recognised standard metrics and allows multiple data sources to be integrated for strategic HR reporting and people analytics. Concerning the information provided in this chapter, percentages are calculated based on headcount, and the absolute numbers given represent headcount unless explicitly stated otherwise. Numbers for employee-related disclosure requirements are derived from this system.

BAM's definition of Senior Leadership Group includes non-employees in a management role in Belgium, despite the fact that these people do not have an employment contract as described above. The Senior Leadership Group is defined as all employees in senior job grades, referred to as grades F, G and H in BAM's salary framework.

Numbers reported for non-employees are derived from the calculations used for reporting hours worked in relation to safety performance. This includes assumptions and estimates. Refer to the accounting principles for safety worked hours for further details.

Own employees

(in headcount, as per 31 December 2025)	**2024**	**2025**
Division Netherlands	6,819	7,019
Division United Kingdom and Ireland	6,654	6,845
Other	298	303
	13,771	**14,167**

Employee turnover

	2024	**2025**
Number of leavers	2,123	2,109
Turnover rate (%)	15.5	15.1

Contract types by gender

	2025			
(in headcount, as per 31 December 2025)	**Division Netherlands**	**Division United Kingdom and Ireland**	**Other**	**Grand Total**
Permanent	6,547	6,626	277	13,450
Female	1,129	1,768	80	2,977
Non-female	5,418	4,858	187	10,463
Temporary	417	90	26	533
Female	94	36	13	143
Non-female	323	54	13	390
Non-guaranteed hours	0	81	0	81
Female	0	32	0	32
Non-female	0	49	0	49
Other	55	48	0	103
Female	1	10	0	11
Non-female	54	28	0	82
Totals	**7,019**	**6,845**	**303**	**14,167**

	2024			
(in headcount, as per 31 December 2024)	**Division Netherlands**	**Division United Kingdom and Ireland**	**Other**	**Grand Total**
Permanent	6,462	6,282	276	13,020
Female	1,068	1,666	76	2,810
Non-female	5,394	4,616	200	10,210
Temporary	313	70	22	405
Female	78	32	12	122
Non-female	235	38	10	283
Non-guaranteed hours	0	105	0	105
Female	0	38	0	38
Non-female	0	67	0	67
Other	44	197	0	241
Female	2	39	0	41
Non-female	42	158	0	200
Totals	**6,819**	**6,654**	**298**	**13,771**

Characteristics of BAM's non-employees (S1-7)

BAM relies for a large part of its construction activities on non-employees as part of the workforce. Subcontracted work (including material purchase) represents around 70% of BAM's cost base. Refer also to the details in the financial statements.

As at 31 December 2025, BAM's own workforce consisted of 69% non-employees (2024: 67%), a total of 31,662 (2024: 27,919).

Own workforce including non-employees

	2024			2025		
(in headcount)	**Employees**	**Non-employees**	**Own workforce**	**Employees**	**Non-employees**	**Own workforce**
Division Netherlands	6,819	11,446	18,265	7,019	13,506	20,525
Division United Kingdom and Ireland	6,654	16,164	22,818	6,845	17,748	24,593
Other	**298**	**309**	**607**	303	408	711
total	**13,771**	**27,919**	**41,690**	**14,167**	**31,662**	**45,829**

Diversity metrics (S1-9)

BAM strongly believes that different backgrounds, cultures and experiences enhance the business, drive innovation and lead to sustainable growth. Gender diversity at all levels is one driver of this. In 2025, female representation was 22% across the Group. In division, Netherlands female representation was 17%; in division United Kingdom and Ireland, female representation was 27%.

Distribution of employees

	2024		2025	
(in %)	**Female**	**Non-female**	**Female**	**Non-female**
Division Netherlands	17	83	17	83
Division United Kingdom and Ireland	27	73	27	73
Other	30	70	31	69
Total	**22**	**78**	**22**	**78**

Representation in management

	2024		2025	
(in %)	**Female**	**Non-female**	**Female**	**Non-female**
Supervisory Board	43	57	50	50
Executive Committee	40	60	40	60
Senior Leadership Group	16	84	20	80

The representation of women on the Supervisory Board stands at 50% (2024: 43%), the Executive Committee at 40% (2024: 40%) and the Senior Leadership Group at 20% (representing 29 women) (2024: 16% representing 23 women). For the definition of the Senior Leadership Group, reference is made to chapter 3.2.

Initiatives taken to drive gender diversity at all levels include a continued focus on inclusive recruitment, resulting in 3% more women within BAM since 2021, and inclusive development, resulting in 5% more women in manager positions. To increase gender representation in senior leadership, BAM continues to focus on initiatives to retain all talent. This is achieved through the BAM Experience and by increasing BAM's inclusive culture. Now and in the future, BAM anticipates that this development will increase the number of women in succession planning and in senior roles.

Training and skills development metrics (S1-13)

Engagement in regular performance reviews

(in %)	**Employees**	**Female**	**Non-female**
Division Netherlands	97	95	98
Division United Kingdom and Ireland	96	96	95
Other	99	97	100
Total	**96**	**96**	**97**

In 2025, we continued to strengthen a consistent and disciplined performance-management culture across BAM. Over the past year, 96% of our employees set clear annual goals, an increase from 90% in 2024. This progress reflects a maturing performance approach supported by established processes and policies, strengthened leadership ownership, and a more disciplined performance rhythm across teams. It also demonstrates our employees' mindset of commitment to contributing to BAM's strategic objectives with clarity and purpose. The goal-setting not only focuses on performance but also on career-development planning across BAM. High-quality development goals are now more firmly embedded in our talent management practices, and enhanced conversations between leaders and employees are supported by practical toolkits. These efforts are helping us to build future-ready capabilities, strengthen succession pipelines and ensure meaningful follow-up on feedback. Strengthening development planning will remain a priority in the years ahead as we continue embedding a culture of continuous learning, growth and performance excellence.

Average training hours

	All employees	**Female**	**Non-female**
Division Netherlands	21	19	22
Division United Kingdom and Ireland	24	16	27
Other	16	15	17
Total	**22**	**17**	**24**

Occupational health and safety metrics (S1-14)

BAM measures safety performance through a combination of lagging and leading indicators, with increasing emphasis on monitoring and preventative actions and behaviours. Skills, training, leadership awareness and a proactive safety culture are key to ensuring greater engagement and safer worksites.

BAM measures and monitors safety performance through the incident frequency and the number of incidents, with the intent of continuous improvement. Incident frequency denotes the number of occupational accidents resulting in lost time (absence from work ≥1 day) per million hours worked. BAM measures incident frequency for its own employees (IF BAM) and for its own workforce, i.e. own employees plus subcontractors (IF Total). These metrics are company specific and are based on industry practices. Industry practice is to not include 'no lost time' incidents in the calculation of IF. In addition, BAM discloses the safety information as required by ESRS S1-14. For more information, refer to table 61.

Over the past year, we advanced our occupational health and safety performance through several key initiatives. We launched a group-wide safety programme, forming the basis for BAM's six Life Saving Rules, eight Safety Principles and Group Safety Standards. In addition, we strengthened our safety reporting, management and investigation systems across the organisation. We also introduced a mandatory e-learning course for all employees and developed 'toolbox talks' to support our on-site operatives in working safely every day. We see safety performance (incident frequency, number of incidents and total number of lost days) improving compared to 2024.

BAM seeks to secure the highest standards of health and safety, irrespective of the standards imposed by any legal framework. All subsidiaries of BAM comply with the ISO 45001:2018 standard for occupational health and safety management systems. All employees and non-employees in BAM's own workforce are covered by BAM's safety management system.

Company specific metric - Incident Frequency (IF)

	2024	2025
Company specific metrics - Incident Frequency (IF)		
IF BAM (own employees) *(x 1 million worked hours)*	2.9	2.7
IF Total (own workforce, including non-employees) *(x 1 million worked hours)*	2.9	2.5
ESRS S1-14 metrics		
Number of lost lives as a result of work-related injuries (own workforce)	2	-
Number of recordable work-related accidents (own workforce) - with lost time	215	193
Number of recordable work-related accidents (own workforce) - without lost time	11	5
Rate of recordable work-related accidents (own workforce) - with and without lost time (x 1 million worked hours)	3.1	2.5
Number of days lost to work-related injuries and lost lives from work-related accidents (own employees)	2,117	1,938
Coverage of health and safety management system *(in %)*	100	100

Working in the construction industry can also expose workers to a variety of hazards that can cause long-term health effects. A case of work-related ill health is any illness caused or aggravated by workplace conditions arising primarily from exposure at work to a physical, organisational, chemical or biological risk factor or to a combination of these factors. These are mental and physical health issues that do not stem from an acute event, such as a work-related accident leading to injury. These health complaints typically manifest after a prolonged exposure to an agent or emerge over an extended period, as seen in diseases that may surface years after exposure.

Reporting principles and assumptions safety

Safety performance at BAM is measured using the company specific incident frequency (IF) indicator. The IF indicator denotes the number of work-related injuries resulting in lost time (absence from work ≥ 1 day) per million hours worked, independent of the severity of the injury. The overall incident frequency (IF) indicator comprises two categories:

- IF BAM: Incident frequency for BAM employees on BAM sites;
- IF Total: Incident frequency including non-employees, i.e. all people working on sites managed by BAM (BAM employees, self-employed people and subcontractors' employees).

In addition, BAM reports on S1-14 required metrics. These metrics relate to the number of recordable work-related accidents with lost time and without lost time. The latter is not part of the company specific calculations BAM uses for IF BAM and IF Total. The definitions in ESRS S1-14 result in the calculation of the rate of recordable work-related accidents (own workforce) including incidents with and without lost time. BAM also reports the number of days lost to work-related injuries and lost lives from work-related accidents of its own employees.

Reportable injuries are based on actual occurrences and are never extrapolated or estimated. Despite all measures and an open safety culture, there is an inherent risk of incomplete incident reporting. BAM is in this respect also dependent on information provided by subcontractors and the person involved in the incident. Work-related incidents and hazardous situations are reported via the incident reporting processes in the business, including high-potential near-misses and dangerous occurrences.

Serious work-related incidents without lost time are also reported as part of the definition under ESRS S1-14. BAM records no-lost-time incidents as serious if the incidents relate to traumatic brain injuries, spinal cord injuries, severe fractures (except for fingers, thumbs and toes), internal injuries, severe burns and major soft-tissue injuries, in line with industry guidance from the Health and Safety Executive (HSE), the United Kingdom's national regulator for workplace health and safety, and the Occupational Health and Safety Administration (OHSA).

The worked hours used in the IF calculation are measured, calculated or estimated. Division United Kingdom and Ireland collects the hours of non-BAM employees in three ways: (1) data collected from the pass used to enter and exit a construction site, (2) hours indicated by the subcontractor, (3) headcount by, for example, the project lead on the project site. Where necessary, the assumption is made that a workday is 8 or 9 exposure hours. In division Netherlands, own employees and hired individuals write their hours worked in BAM's systems. Some of the hours can be calculated based on spend, where a set fee is paid, such as for a machine with operator, for example. Hours of other non-BAM employees working for division Netherlands are determined based on the amount that is transferred to the 'G-rekening' per estimated hour worked.

Worked hours relate to the calendar year 2025, with the exception that part of the business uses the timeframe from 25 December 2024 to 24 December 2025.

Remuneration metrics (pay gap and total remuneration) (S1-16)

Driving diversity and inclusion is at the core of BAM's reward practices. BAM aims to enhance the transparency of terms and conditions and address any pay gap that may exist for equal types and levels of work. In 2024, BAM calculated the unadjusted pay gap between female and non-female employees for the first time. This pay gap is defined as the difference of average and median pay levels between female and non-female employees, expressed as percentage of the average pay level of non-female employees. Gender categories are female and non-female, in line with BAM's ambitions for female representation in the workforce and to avoid the risk of singling out employees who are non-binary or whose gender is not recorded.

Gender pay gap

(in %)	**2024**	**2025**
Based on *average* pay levels	19	17
Based on *median* pay levels	17	16

The average pay of female employees is 17% less than the average pay of non-female employees. Calculations using a median instead of average show a pay gap of 16%. Insights show that this gap is largely attributable to the distribution of female and non-female employees across the organisation. This is mainly due to the under representation of female employees in higher paid roles, as also reflected in the female representation in senior leadership (chapter 3.2).

BAM is working on a harmonised job grading framework as well as an adjusted pay gap calculation methodology to gain further insights and prepare for the requirements of the EU pay transparency directive that will be implemented in local law by June 2026 and January 2027. It remains a key priority for talent management and acquisition at BAM to remedy any pay gap towards the future.

Reporting principles and assumptions - gender pay gap

BAM reports on the unadjusted average and median gender pay gap between female and non-female own employees. Own employees are active BAM employees with an employment agreement at a majority owned BAM entity on 5 April 2025.

For this calculation, pay is operationalised as the base salary and value of the company car benefit on 5 April 2025, plus any bonus (eg. STI, LTI, profit sharing, one-off bonus) received between June 2024 and May 2025, all recalculated to an hourly rate.

BAM has chosen this operationalisation of pay because it contains the main components of the remuneration received by employees. Other benefits that BAM offers, whether in cash or kind, are laid down in gender-neutral Collective Labour Agreement or company policies. Such benefits are essentially equal for employee categories and including them would have no material impact.

For base salary and the value of the company car benefit, BAM makes use of a reference date instead of using data for the full financial year. This enables timely reporting and has no material impact on the outcome. All data has been extracted from BAM's HR and payroll systems and the data of 99.2% of BAM employees is included in the calculation.

Return on inclusion (entity specific)

BAM measures the impact of its diversity and inclusion initiatives by means of the Return on Inclusion audit related to 20 key focus areas, performed by an external independent party. In 2023, BAM achieved Bronze on the ROI. BAM has set a target score of 71 (Gold) or higher by 2030 and is performing interim assessments to measure its progress towards achieving the target. Return on Investment with diversity and inclusion is expressed in an audit score and/or a current return in euro per euro invested in diversity and inclusion. The scores of the ROI audit can be categorised as follows: 1. Diamond (90+) - exemplar; 2. Platinum (81-90) - leader; 3. Gold (71-80) - champion; 4. Silver (51-70) - aspiring; 5. Bronze (0-50) - starting out.

The next assessment will take place in 2026 and so BAM used 2025 to focus on embedding the recommendations from the previous assessment, in 2023, and conducting a light touch 'health check' to ensure we are on track to meet our target. The health check demonstrated progress specifically in embedding D&I across BAM's HR processes and measuring the impact on inclusion. Activities during 2025 included broadening the focus of our inclusion to all diverse groups, supporting the development of the numerous employee networks in the divisions to increase inclusion locally, and hosting workshops with teams spanning HR and business operations (IT, procurement, etc) to embed the actions.

Social value (ESRS S3 - entity-specific)

Social value in the construction sector refers to the positive impact projects have on people, communities and the economy beyond just the physical build. It includes job creation, skills development and community wellbeing. By prioritising local employment and procurement, fair labour practices and leaving a social legacy, companies can enhance social equity and long-term societal benefits. Disclosures are related to the following material impacts, risks and opportunities, as identified through BAM's double materiality assessment process. Refer to the full details in chapter 6.1.

Material impact, risk or opportunity		
Social value		
Social value	(VC)	Positive impact

The disclosures in this section should be read in conjunction with the disclosures in chapter 6.2 on Governance, Strategy, and Impact, risk and opportunity management.

Interests and views of stakeholders (SBM-2)

Affected communities are a key group of affected stakeholders. BAM addresses the interests and views of affected communities through its local community engagement on projects. Social value relates to the overall positive impacts BAM can have on affected communities. BAM's strategy-setting on social value is informed by the perspectives of BAM's clients, in which interests and views of local communities are often incorporated.

Material impact, risks and opportunities and the interaction with the strategy and business model (SBM-3)

The material impact regarding social value is closely connected to BAM's strategy and business model. BAM's strategy encompasses the theme social value. The policies and underlying actions and measures are designed to manage and inform management on the progress, and results are taken into account when adapting the business model.

Policies related to social value (S3-1)

Social value is one of the topics in BAM's sustainability strategy and is explicitly mentioned in BAM's Group Sustainability Policy. The following responsibilities are described:

- Commit to making a positive social contribution and acknowledge BAM's responsibility to engage with the communities in which it works (for example, by using local agencies, labour and workforce).
- Tackle social issues identified by clients, employees and local communities.

These responsibilities are described in more detail in BAM's social value policies for the United Kingdom and Ireland and for the Netherlands, including more specific commitments to local aspects.

Processes for engaging with affected communities about impacts (S3-2)

BAM engages with affected communities on a project level through its general project approach that includes local community engagement. In most cases, the project manager or a dedicated social value manager is responsible for ensuring this engagement happens. Engagement with affected communities also often occurs by or in collaboration with the client. Social value addresses the positive impact BAM can have on affected communities and BAM's approach is informed by local obligations (see S3-5).

Taking action on material impacts on affected communities regarding social value (S3-4)

BAM takes various actions to positively impact the communities where it operates. These actions are carried out directly by BAM and in collaboration with supply chain partners. They can have a short and/or long-term effect as they are carried out both ahead of and during the construction phase, and in the legacy left by the completed projects. Each division follows a slightly different social value approach, which is detailed under Metrics and Targets (S3-5). The specific approach is usually guided by a type of Local Needs Analysis and/or client requirements, identifying particular priorities of the affected community.

Additionally, BAM is part of the Considerate Constructors Scheme (CCS) in the United Kingdom and its Dutch equivalent, Bewuste Bouwers. In this scheme, construction sites implement the Code of Considerate Practice, which includes behaviours for respecting the community, caring for the environment and valuing the workforce. In the United Kingdom, 46 CCS projects were registered in 2025 (2024: 53) sustaining an average audit score of 43.7 (2024: 43.7), above the industry average of 40.9. Under the scheme in the Netherlands, 53 sites were registered (2024: 69), with an average audit score of 3.6 against a national average of 3.4, based on a new auditing methodology in use since April 2025.

Targets related to advancing positive impacts (S3-5)

Social value has a strong legislative basis in public contracts, but there are significant differences in methodology. BAM's therefore set separate metrics and targets in its strategy for division Netherlands and division United Kingdom and Ireland. The target values were considered by internal experts to represent the right balance between ambition and feasibility. Social value contributions through BAM's projects and other activities are currently not defined for the Belgian part of the business.

Division Netherlands

Dutch projects for public sector clients often contain an SROI (Social Return on Investment) obligation, with an emphasis on supporting people with a distance to the labour market to secure jobs. The exact obligations vary, but the amount to be invested on activities that contribute to this theme is commonly 2-5% of the contract sum. The aim for division Netherlands is to deliver 5% social value on top of contractual obligations in 2026. Activities include:

- Jobs: offering work on projects to people distanced from the labour market;
- Education and training: offering different types of work experience and vocational training combining work and study;
- Procurement from social businesses, such as from sheltered workshops or social enterprises;
- School visits: to engage the workforce of the future by, for instance, giving job interview training to high school students through the JINC programme;
- Donations to NGOs or charities;
- Volunteering: different ways to give time and experience, such as renovating a community building free of charge, or mentoring youth from disadvantaged backgrounds.

Based on the 2025 assessment of BAM Infra Netherlands, covering the majority of projects in scope for the whole division, a surplus was achieved in addition to the contractual obligations contained in public sector contracts, with a delivery of 112% of SROI (€13.9 million). Projects with SROI obligations in other segments are not yet part of this assessment, through which the total outcome for the division could be different.

Division United Kingdom and Ireland

In the UK, social value is firmly embedded in legislation through the social value Act, PPN 002 (replacing PPN 06/20), the Procurement Reform Act (Scotland), and the Future Generation Act (Wales). Governments are actively encouraging public sector investments to maximise social impact by mandating social value reporting. Division United Kingdom and Ireland does this by reporting on Social and Local Economic Value (SLEV), calculated through the BAM TOMs, a framework based on the national TOMs (Themes, Outcomes, Measures) framework. More information on the SLEV methodology can be found under reporting principles.

Social value is how BAM measures social sustainability activities and is underpinned by three key strategic themes:

- Social Mobility: empowering individuals by providing inclusive and accessible pathways in education, employment and training programmes.
- Foundational Economy: building community wealth by maximising opportunity for local procurement, investing in local charities and social businesses (VCSEs), and volunteering time, skills and expertise.
- Social Inclusion: fostering diversity, equity and inclusion (EDI), actively engaging with the community and creating lasting legacies that benefit the community long after construction is complete.

For each of these themes, a set of TOMs (Themes, Outcomes and Measures) further defines the activities delivered. Activities within this framework are logged at project level in the Social Sustainability Reporting Tool, accumulating to the total divisional SLEV performance.

BAM defined a social value target for division United Kingdom and Ireland based on the national TOMs framework. The target for 2026 is to deliver 35% social value (expressed as SLEV – Social and Local Economic Value) as a percentage of the reported revenue.

In 2025, the SLEV reported in division United Kingdom and Ireland was 19.9% (2024: 15.6%) and supported by data in 12 out of 13 BAM TOMs. This increase has been achieved by measuring performance in more projects and across more TOMs, in addition to more automated reporting and efforts to increase the SLEV performance at each project. This includes detailed steps in the Business Management System to embed Social Value opportunities in all phases of the project. While the 2026 target is ambitious, we expect the improvements we have made in these processes to deliver higher SLEV contributions.

Reporting principles social value
Division United Kingdom and Ireland

BAM has selected 13 core measures (NTs - National TOMs) from the nations TOMs framework that best reflect BAM's social value delivery across the project portfolio. Underneath NT1 (local employment), there are nine sub-measures covering additional characteristics of vulnerable employees (e.g., ex-offenders, long term unemployed, disabled, etc.).

These core measures and sub-measures were selected from the full list of national TOMs to bring focus to BAM's social value delivery and reporting. These are the measures that are most commonly valued by clients and/or where BAM has specific skills and capacity. The proxy value attributed to each TOM is a national proxy value that is used across the division.

The TOMs and proxy values used are from the 2022 national TOMs framework. The proxy values in the table below have been converted from Pounds Sterling to euro for reporting purposes, subject to the exchange rate.

The original 2022 proxy values in Pounds Sterling are consistently applied in the calculations, so changes in exchange rates don't influence the overall SLEV percentage generated.

The Netherlands

In division Netherlands, reporting is based on the SROI obligations as set out in public sector contracts. The permitted activities and the attributed value for each activity varies per project as this is determined by the policies of the client. They can, for instance, use the 'Building Block' method, with a detailed table of proxy values for each target group and activity. Each activity is assigned the corresponding proxy value. In other methods, bespoke values are applied. Only approved activities that are signed off by the client count towards the total SROI delivered in the contract.

For the total SROI calculation, only finished projects are included. The overall SROI is determined by dividing the total SROI delivered on these projects by the total SROI obligations associated with them. Any surplus is the result of overdelivering SROI-generating activities on projects, beyond the obligations set by the clients.

	Theme	NT	Description	Proxy Value (€)	Units
Social Mobility	Employment	NT01	Local employees hired or retained on contract – FTE (Full Time Equivalent)	36,654	No. people FTE
		NT11	Hours of 'support into work' assistance provided to unemployed people through career mentoring, including mock interviews, CV advice and careers guidance	124	No. hours x No. attendees
	Education	NT08	Staff hours spent on local school & college visits	20	No. staff hours
	Training	NT09	Weeks of training opportunities on the contract	372	No. weeks
		NT10	Weeks of apprenticeships or T-levels on the contract	295	No. weeks
		NT12	Weeks of meaningful work placements / pre-employment courses (1-6 weeks, unpaid)	228	No. weeks
		NT13	Weeks of meaningful work placements (6+ weeks, paid real living wage)	406	No. weeks
Foundational Economy	Theme	NT	Description	Proxy Value (€)	Units
	Investment in VCSEs	NT14	Total amount spent with Voluntary, Community & Social Enterprises (VCSEs) within supply chain	0.12	Spend (euro)
	Progressive procurement	NT18	Total amount spent in the local supply chain through the contract.	0.75	Spend (euro)
	Volunteering	NT15	Provision of expert business advice to VCSEs & MSMEs (e.g. financial advice / legal advice / HR advice / HSE)	118	No. staff expert hours
		NT29	Hours of volunteering time provided to support local community projects	20	No. of staff volunteering hours
Social Inclusion	Theme	NT	Description	Proxy Value (€)	Units
	Community Engagement	NT28	Donations or in-kind contributions to local community projects	1	Spend (euro)
	Diversity & Inclusion	NT21	Equality, diversity & inclusion training for staff & supply chain	118	No. hours (total session duration) x No. attendees

6.5 Governance information

Business conduct (ESRS G1)

Business conduct and business conduct matters relate to BAM's business ethics and the relationships the company has with its stakeholders, especially own workforce (including subcontractors) and vendors (subcontractors and suppliers). Disclosures are related to the following material impacts, risks and opportunities, as identified through BAM's double materiality assessment process. Refer to chapter 6.1 for the full details.

Material impact, risk or opportunity		
Governance – business conduct		
Corporate culture	(OE)	Positive impact
Protection of data and respecting privacy	(OO)	Negative impact
Prevention and detection of corruption and bribery	(OO)	Negative impact

The disclosures in these this sections should be read in conjunction with the disclosures in chapter 6.2 on Governance, Strategy, and Impact, risk and opportunity management.

Description of the processes to identify and assess material impacts, risks and opportunities (IRO-1)

BAM identifies material impacts, risks and opportunities related to business conduct matters by evaluating criteria such as location, activity, sector and the structure of transactions, with particular attention to local laws and regulations in the Netherlands and the United Kingdom and Ireland. By considering these criteria, including compliance with local laws, BAM effectively manages risks and capitalises on opportunities aligned with its strategic objectives.

The role of the administrative, supervisory and management bodies (GOV-1)

The Ethics and Compliance Committee supports the Executive Committee and the divisions with the compliance programme, actual compliance matters and remedial actions. It ensures consistency across the Group. Reported suspicions of misconduct are discussed on a quarterly basis with the Executive Committee and every six months with the Supervisory Board.

On an annual basis, the effectiveness of the management approach is assessed and improvement activities are captured in the operating plan. The procedures described in this paragraph apply to all of the themes that are relevant to the business conduct matters discussed in this chapter.

The administrative, management and supervisory bodies have been engaged with BAM for several years; they possess expertise in business conduct matters, drawing from diverse backgrounds in human resources, operations, finance and engineering.

Business conduct policies and corporate culture (G1-1)

The BAM Code of Conduct and underlying procedures describe the expected behaviours and it deals with varying subjects such as the BAM values, safety, human rights, preventing bribery & corruption, protection of data and respecting privacy. It applies to all BAM employees, including contract and temporary workers. Living the Code of Conduct contributes to a safe, ethical and sustainable culture and protects the future of BAM.

The Code emphasises acting with integrity and honesty, complying with legislation, regulations, and generally accepted social standards. The topics in the BAM code of conduct form part of the risk management process (including a compliance risk assessment), training and awareness, and monitoring and reporting. New employees must sign a statement in which they confirm they will comply with the code as part of their employment contract. Further information on how BAM interacts with its employees is disclosed in the chapter 6.4 section Policies related to own workforce (S1-1) and Action taking on material impacts on own workforce, approaches to managing material risks and effectiveness of those actions (S1-4) and chapter 6.5 section Business conduct policies and corporate culture (G1-1). chapter 6.4 section Policies related to own workforce (S1-1) and Action taking on material impacts on own workforce, approaches to managing material risks and effectiveness of those actions (S1-4) and chapter 6.5 section Business conduct policies and corporate culture (G1-1).chapter 6.4 section Policies related to own workforce (S1-1) and Action taking on material impacts on own workforce, approaches to managing material risks and effectiveness of those actions (S1-4) and chapter 6.5 section Business conduct policies and corporate culture (G1-1). Chapter 6.4 section Policies related to own workforce (S1-1) and Action taking on material impacts on own workforce, approaches to managing material risks and effectiveness of those actions (S1-4) and chapter 6.5 section Business conduct policies and corporate culture (G1-1).

BAM's anti-bribery and corruption policy states that, in line with law, regulation and the BAM Code of Conduct, the company does not tolerate bribery and corruption. It includes the key anti-bribery and corruption principles that all employees and any other representatives of BAM need to adhere to, and that business must be conducted honestly. Engaging in bribery or corruption, even indirectly or through third parties, may lead to dismissal, end of a business relationship, and, in addition to substantial fines, even imprisonment. In 2025, we extended our code of conduct, policies and training based on the UK Economic Crime and Corporate Transparency Act (ECCTA),aimed at strengthening the controls to prevent fraud.

BAM's key principles in the privacy policy, the information security governance policy and the data retention policy relate to the processing of personal data and the duty of employees, and any other representatives, to report any (suspected) personal data breaches and ensure the proper protection and management of information to ensure confidentiality, integrity and availability of information.

BAM believes that communication and training are fundamental to bringing the code of conduct to life and to encouraging open conversations. BAM adopted a targeted approach to the different working groups to achieve optimum understanding and adaptation. An e-learning tool is used to train selected employees on all the topics in the code. The training, available in country-specific languages (e.g. Dutch and English), is mandatory for BAM employees, except BAM site employees who do not have access to online learning platforms. The mandatory group covers roughly 70% of the total number of employees.

Progress is closely monitored and reported to management. BAM targets a 95% completion score for the training, to allow for fluctuations due to new people joining the company. Site employees without access to online learning platforms are trained through so-called toolbox meetings. Additionally, compliance officers provide target-group-specific training sessions to educate specific people about particular compliance themes.

Training

(in %)	**Target**	**2025**	**2024**
Coverage - Code of conduct e-learning	95	99	97
Coverage - Corruption and bribery e-learning	95	98	96
Coverage - Data privacy and protection e-learning	95	97	98

In 2025, there were 211 (2024: 148) suspicions of misconduct reported. The reported suspicions of misconduct have been assessed and, where needed, sanctions have been taken, up to and including dismissal. Reported cases dealt with issues such as inappropriate use of company assets, safe working environment and privacy breaches, of which a limited number needed to be reported to the local external privacy authorities. There have not been any fines, penalties or compensation for damages regarding the suspicions of misconduct reported in 2025 (2024: 0).

Fostering a speak-up culture, in which employees feel empowered to talk about any issue without fear of negative consequences, is essential for BAM. The Speak Up procedure, which is also summarised in the code of conduct, encourages the reporting of possible breaches. This can be done through independent and protected systems for employees, offering protection for those who do so. These systems ensure confidentiality and the impartial handling of complaints.

The procedure also includes the requirements of the (EU) Whistleblower Directive. The periodic 'employee pulse survey' showed that the majority of employees feels free to express concerns without fear of negative consequences.

Work to promote awareness of the Speak Up option is a key theme in the compliance programme. Those who wish to report a concern or incident can report directly to a line manager, confidential advisor or compliance officer. People wishing to remain anonymous can use the Speak Up Line, which is operated by a third party and open to employees and external stakeholders alike 24/7. Cases that are identified as higher risk are reported to the Ethics and Compliance Committee.

BAM is involved in many stages of the construction value chain, from development, engineering and construction to maintenance and operation. Vendors are essential in all this, as their knowledge, people and other resources provide more than 70% of BAM's revenue.

Vendors are subject to BAM's general purchasing terms and conditions and BAM's Vendor Code of Conduct, which cover commitments to safety, human rights, sanctions and trade restrictions and the environment.

Procurement secures continuous alignment on selected categories, systems, reporting and knowledge exchange. In 2025, sustainable sourcing and safety in the supply chain remained key topics contributing to the BAM strategy.

BAM focuses on key and preferred vendors to strengthen and monitor quality and compliance in the chain of subcontractors and suppliers. The company also deploys onboarding for vendors and they are assessed on their compliance with BAM requirements. Depending on the specific nature of the services provided by potential higher risk vendors, additional risk mitigating measures are taken, such as specific certifications, which are audited by external parties.

Prevention and detection of corruption and bribery (G1-3)

Undetected corruption and bribery can cause serious damage to society, including damaging public trust and causing injustice by benefitting some at the expense of others. Compliance risk assessments are conducted as part of BAM's risk management process. BAM obtains its main revenue in countries with a low or very low risk of corruption according to the Corruption Perception Index (CPI) from Transparency International. This index focuses on the strict application of the United Nations Convention Against Corruption (UNCAC). Furthermore, there are quarterly risk assessments. These examine compliance risk developments and assess measures to ensure a match with the very low risk appetite for corruption and bribery risks. The results are reported to the Executive Committee and other stakeholders on a quarterly basis. In the case of an investigation, the investigators or investigating committee is separate from the chain of management involved in the matter.

Certain functions are more vulnerable to corruption, bribery and fraud risks. These include (commercial) management, project management, finance- and procurement-related functions and the members of the Executive Committee. This specific group, targeted for the corruption and bribery e-learning, covers around 40% of the total number of employees and there is a specific, in-depth e-learning on the prevention of corruption, bribery and fraud for all these functions. This training includes components like legal frameworks, risk management, ethical decision-making, third-party management, reporting, and whistleblowing. BAM has a formal learning platform through which these mandatory trainings are spread, linked to BAM's HR data platform.

BAM's percentage of targeted employees that have completed training regarding corruption and bribery is in line with the target (refer to the Training table). The topic of corruption and bribery also forms part of the code of conduct and its underlying policies and is monitored by BAM's compliance officers.

Incidents of corruption or bribery (G1-4)

	2025	2024
Number of convictions	0	0
Amount of fines for violation of anti-corruption and anti-bribery laws	€ 0	€ 30.000

There were no fines, penalties or compensation for damages related to corruption and bribery in 2025. This includes incidents involving actors in BAM's value chain in which BAM or its employees were directly involved.

Protection of data and respecting privacy (entity-specific)

Implementing robust data protection measures safeguards the personal data of employees and clients. Protection of data and respecting privacy is a core element of the BAM code of conduct, and is part of underlying, specific policies on data privacy, information and cyber security. BAM has dedicated Privacy and Security functions who collaboratively work together with management to implement 'privacy and security by design' within the organisation, at selected projects, and in contracts with new third parties.

BAM has relevant certifications in place, such as ISO 27001 Information Security and Cyber Essentials. Furthermore, there is a coordinated training and awareness programme to keep management and employees up-to-date regarding new developments and required behaviour. The training is mandatory for BAM employees, including the members of the Executive Committee, but excluding BAM site employees without access to online learning platforms. The mandatory group covers roughly 70% of the total number of employees. The objective is to reach around 95% completeness on an ongoing basis. Performance for 2025 has been in line with the target (refer to the Training table). In addition, there are specified privacy, information security and cyber security controls included in the BAM Requirements Framework. These are being assessed on the effectiveness of their risk mitigation. A limited number of privacy breaches had to be reported to the local external privacy authorities. There were no fines, penalties or compensation for damages during the reporting period.

Incidents related to data protection and privacy

	2025	2024
Number of convictions	0	0
Amount of fines for data breaches	0	0

6.6 EU taxonomy

The EU taxonomy for sustainable activities, i.e. 'green taxonomy', is a classification system to clarify which economic activities are environmentally sustainable, in the context of the European Green Deal, a set of policy initiatives by the European Commission supporting the ambition of the EU to be climate-neutral by 2050. The EU taxonomy was adopted by the European Union with Regulation 2020/852, and requires BAM to assess and disclose the percentage of environmentally sustainable economic activities for the proportion of revenue, capital expenditures and operational expenditures.

In line with the most recent amendments to the EU Taxonomy - specifically the version updated following the Omnibus Delegated Act, published in the Official Journal of the European Union on 8 January 2026 and entering into force on 28 January 2026 - we will make use of the available relief measures under the revised reporting framework. Under this updated framework, the separate reporting templates for nuclear energy have been removed, and related information is now captured on an aggregated level within the general templates. As a result, we will not be disclosing a standalone nuclear energy table. We will however not apply the materiality relief introduced in the amended Taxonomy Regulation. While the updated framework allows undertakings to classify economic activities as non-material when they collectively represent less than 10% of turnover, CapEx, or OpEx, applying this rule in our case would render most of our activities immaterial. Such an outcome would not present a meaningful or representative view of our economic activities or sustainability profile.

The EU taxonomy comprises six environmental objectives to identify sustainable economic activities: climate change mitigation (CCM), climate change adaptation (CCA), the sustainable use and protection of water and marine resources (WTR), the transition to a circular economy (CE), pollution prevention and control (PPC), and the protection and restoration of biodiversity and ecosystems (BIO). An economic activity is defined as environmentally sustainable if it meets the technical screening criteria.

BAM has completed an eligibility assessment of its activities and for the eligible activities BAM assessed alignment with the EU taxonomy.

The assessment process has been executed under the supervision of the Executive Committee, and led by the Sustainability Reporting team with the support of the relevant functions, such as sustainability and finance.

The assessment covers all countries in which BAM operates and is carried out using the five steps presented in the figure on the right.

BAM has classified all the economic activities across its portfolio in the following three categories: eligible-aligned, eligible-not aligned, and not-eligible.

The current EU taxonomy assessment is based on BAM's interpretation of EU taxonomy guidelines, including the latest published Environmental Delegated Act. BAM recognised that the regulation is continuously being developed, hence some elements are open to interpretation by the industry and other parties. This will potentially affect BAM's interpretation of the criteria going forward, and therefore the outcomes of taxonomy eligibility and alignment.

Five steps of the EU taxonomy assessment

1. Identification of eligible economic activities
2. Analysis of substantial contribution
3. Assessment of Do No Significant Harm (DNSH) to other environmental objectives
4. Verification of minimum safeguards
5. Calculation of financial metrics

Reporting principles and assumptions - EU taxonomy

The EU taxonomy requires companies to examine whether an economic activity is included in the Delegated Regulation 2020/852 by the European Commission (eligibility) and whether or not these eligible economic activities are environmentally sustainable (alignment).

BAM classifies its activities in the following three categories: eligible-aligned, eligible-not aligned, and not-eligible.

Eligible-aligned: this refers to an economic activity that simultaneously meets the following three conditions:

- it is explicitly included in the EU taxonomy regulation for its substantial contribution to one of the six objectives of the EU taxonomy;
- it meets the substantial contribution criteria in the EU taxonomy regulation for this specific environmental objective;
- it meets all DNSH criteria;
- BAM complies with the minimum safeguards.

Eligible-not aligned: this refers to an economic activity that:

- is explicitly included in the EU taxonomy regulations for its substantial contribution to one of the six objectives of the EU taxonomy; but
- it does not meet the specific criteria in the EU taxonomy regulation for these specific environmental objectives; or
- at least one of the DNSH conditions is not met; and/or
- BAM does not comply with the minimum safeguards.

Not eligible: this refers to an economic activity that has not (yet) been identified by the EU taxonomy as a substantial contributor to one of the six objectives of the EU taxonomy.

Definition of KPIs

The basis for the calculation of the EU taxonomy eligibility and alignment metrics for respectively revenue, capital expenditure and operational expenditure are based on the following definitions:

Revenue: revenues accounted for in the consolidated financial statement as further defined in note 6 of the financial statements. Intercompany revenue is eliminated and is not taken into account for the assessment of eligibility. Full reconciliation of the project list used for the eligibility and alignment calculation is performed to ensure accuracy and completeness of the numbers included and prevent the risk of double counting.

Capital expenditure (capex): additions to tangible and intangible assets accounted for in the consolidated financial statements under IFRS during the financial year, considered before depreciation, amortisation and any re-measurements, excluding goodwill (included in notes 14, 15 and 16 in the Financial Statements). The capex cover the costs accounted for in accordance with IAS 16 (Property, Plant and Equipment, IAS 38 (Intangible assets) and IFRS 16 (Leases). Any leases that do not result in the recognition of a right of use asset are not accounted for as capex.

Operational expenditure (opex): direct non-capitalised costs recorded in the consolidated income statement under IFRS that relate to research and development, building renovation measures, short-term lease, maintenance and repair (excluding expenses reported as raw materials and consumables used), and any other direct expenditure relating to the day-to-day servicing of assets or Property, Plant and Equipment (PP&E). Because the definition under the Delegated Act is taken into account to calculated total opex, the numbers differ from the figures presented under the heading ‘operating expenses’ in the financial statements.

The calculation of the financial metrics associated with each economic activity was performed relying on a centralised process, where sustainability information is mapped to financial information in a single database. The financial information was collected from the Group’ reporting system. Sustainability information is obtained from the CRM system and enriched with management information on the environmental performance of the economic activities. Procedures and assumptions were documented, including details, examples and substantive evidence of the assessment, in order to complete a reliable estimate of the eligibility and alignment assessment. In order to arrive at the EU taxonomy KPIs, BAM mapped its financial performance to the relevant EU taxonomy eligible and aligned economic activities.

Minimum social safeguard requirements

BAM has verified that the eligible economic activities are carried out in compliance with the minimum social safeguards, including the human right due diligence process and risk assessment.

Revenue - eligibility methodology

The revenue KPI is calculated based on the proportion of net revenue generated from projects. Revenue of joint ventures (as reported in note 17 of the Financial statements) is not included in the scope of the assessment. The analysis with regard to taxonomy eligibility was carried out on data per project. The EU taxonomy provides descriptions of eligible economic activities that belong to one of the six objectives of the EU taxonomy.

The activities of BAM that are eligible under the EU taxonomy are all eligible under activities within the objectives climate change mitigation, climate change adaptation, and/or the transition to a circular economy.

Revenue - alignment methodology

For the purpose of the taxonomy-alignment assessment, BAM clustered projects based on the nature of the activity and similarity in operational and technical criteria to assess compliance with the technical screening criteria in the EU taxonomy. Based on the BAM's strategic focus, preliminary screening and internal identification of potential 'green' revenue with different stakeholder groups, BAM selected multiple clusters for which the alignment assessment was performed. Dependent on the granularity of the criteria, the assessments were performed on a country, business or project level.

BAM's alignment assessment includes the analysis of all substantial contribution criteria and DNSH criteria for the relevant objectives. In the assessment BAM:

1. Describes the context and application in BAM's context;
2. Substantiates and provides available documentation to support the claim on whether an activity meets the criteria, either on a project, or on an activity level, dependent on the nature of the criteria;
3. Reaches a conclusion on the alignment based on the available substantiation;
4. Evidences adherence to the minimum safeguards on a Group-wide level.

Capex - eligibility and alignment methodology

The eligibility scan for capital expenditures in 2025 (capex additions) was performed in line with the eligibility scan for revenue. For all expenditures, BAM determined if there was a specific allocation possible to an economic activity. Most capex, such as (electric) equipment or cars, tower cranes, surveying equipment or cabins is associated with multiple economic activities.

Eligibility for these additions is determined based on the proportion of the capital expenditure associated with taxonomy-eligible activities on a business level. Capital expenditure by joint ventures (as reported in note 17 of the Financial statements) is not included in the scope of the assessment.

The capex alignment assessment is based on three possible alignment scenarios:

- Capex is related to assets or processes that are associated with taxonomy-aligned economic activities;
- Capex is part of a Capex-plan as defined in the regulation to expand taxonomy-eligible economic activities to become taxonomy-aligned (subject to conditions);
- Capex is related to the purchase of output of aligned activities.

The aligned capex related to the first scenario has been calculated based on a pro-rata basis related to the revenue of the aligned economic activities per business. For the assessment and disclosures in 2025, BAM has allocated the capex to the economic activities mapped to the revenue KPI. Hence, alignment criteria applied to capex are equal to the criteria applied for the related economic activity. For example, with respect to investments in electric cars, BAM has assessed the alignment of capex in the context of the revenue generating activity it was allocated to. BAM has not included specific capex plans for the capex alignment assessment of 2025, because the plans for improvements do not (yet) constitute a plan to reach alignment fully.

Part of the aligned capex is based on the third category where BAM proved alignment on the capex investment itself and reported the invested amount as aligned capex.

Opex - eligibility and alignment methodology

The expense accounts identified to determine operational expenditures according to the EU taxonomy definition are the following:

- Repairs and maintenance;
- Short-term leases (< 12 months);
- R&D expenses.

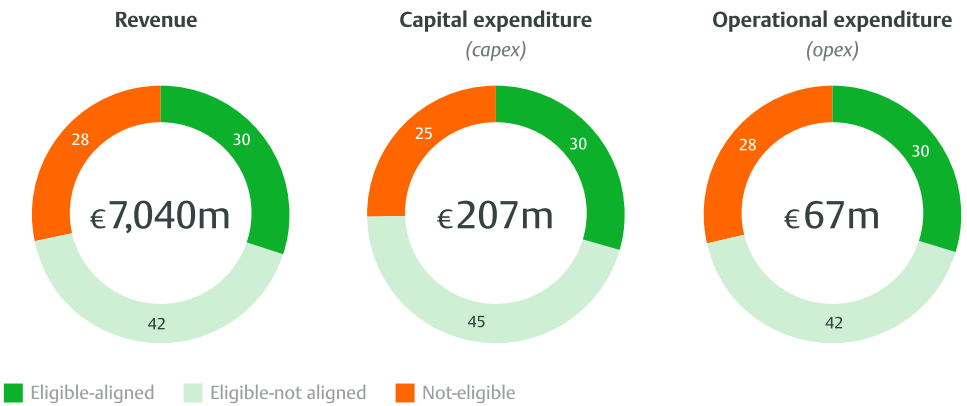
For repairs and maintenance, eligibility is determined on the basis of the activity description in the general ledgers. For the annual rent expenses related to short-term leases and R&D expenses, eligibility is calculated on a pro-rata basis related to the revenue eligibility of the activities per business.

Conclusion of the assessment

Aligned revenue in 2025 of 30% has increased compared to last year (2024: 27%). Mainly caused by shifts in portfolio and improved availability of evidence. Key insights from the assessment of the technical screening criteria have been shared within the business to further enhance BAM's knowledge on building sustainably.

Revenue, capital expenditure (capex) and operational expenditure (opex)

(in %)



Revenue - eligibility outcome

In 2025, 72% of BAM's revenue is eligible under the EU taxonomy, compared to 68% in 2024 (previously reported: 85%). The drop in last year's eligibility percentage is due to the fact that we have incorrectly claimed eligibility for our revenue for the activities CCA 6.15, CCA 6.16 and CE3.14 in last year's disclosure. During the current-year review, BAM reassessed its position, informed by updated clarification from the European Commission. According to the Commission's Q&A FAQ 5 (Publications Office) and FAQ 19 (link), turnover from adapted activities cannot be recognised as Taxonomy-eligible, as such activities - once made climate-resilient - may or may not provide environmental benefits and therefore do not constitute eligible revenue under the EU Taxonomy framework. We are therefore correcting our approach and no longer including these activities. The outcome is that the prior-year eligible revenue percentage has been restated from 85% to 68% to correct the inappropriate inclusion of turnover related to adapted activities. Details per activity are disclosed in the EU Taxonomy tables.

Project revenues reported as not-eligible include economic activities related to electrical installations (including fibre cables for homes), data networks, earthworks, drill and blast projects. In line with last year, BAM reported activities such as the ground investigation works for planned wind farms and the construction of cement bases of wind farms as not-eligible.

Revenue - alignment outcome

In its alignment assessment, BAM obtained substantial evidence for meeting the relevant criteria. In 2025, BAM has aligned revenue, related to specific projects or businesses, in the following activity categories:

- Transmission and distribution of electricity (Netherlands) - CCM 4.9;
- Infrastructure for rail transport (Netherlands and United Kingdom) - CCM 6.14;
- Infrastructure enabling low carbon water transport (Netherlands) - CCM 6.16;
- Low carbon airport infrastructure (Netherlands) - CCM 6.17;
- Construction of new buildings (Netherlands), including both residential and non-residential buildings - CCM 7.1;
- Renovation of existing residential buildings (Netherlands) - CCM 7.2;
- Installation, maintenance and repair of charging stations for electric vehicles in buildings (Netherlands) - CCM 7.4;
- Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings (Netherlands) - CCM 7.5;
- Installation, maintenance and repair of renewable energy technologies (Netherlands) - CCM 7.6.

The largest part of BAM's aligned revenue in 2025 is coming from the projects related to the infrastructure for rail transport (EU taxonomy CCM 6.14) in the Netherlands and United Kingdom. This outcome is similar to last year.

Within EU Taxonomy activity CCM 7.1, the amount of Taxonomy-aligned revenue has increased compared to the previous year. This rise is mainly the result of a greater number of projects assessed in 2025. BAM collects evidence against the technical screening criteria for each relevant project individually. BAM views the higher number of assessed projects as a positive step, as it enables the reporting of more sustainable revenue. However, this increase alone does not yet allow BAM to conclude that projects are, in general, being designed and executed in a more sustainable way. Improving the completeness and quality of data collection remains the primary challenge for further increasing the alignment percentage within this activity.

In addition to the residential projects, the assessment also resulted in aligned non-residential revenue in CCM 7.1 and CCM 7.2. The assessment shows that while many non-residential projects meet the contribution criteria and most of the DNSH requirements, achieving EU Taxonomy alignment is significantly more feasible when a project starts with a clear intention to align. When alignment objectives are embedded from the outset, it becomes easier to make the right design and execution choices throughout the project lifecycle. Conversely, projects that are already underway - without this early focus - tend to be harder to align, as key decisions may have been made before Taxonomy requirements were considered.

BAM has aligned revenue on the activity in EU taxonomy article CCM 6.16, these are the projects that are installing the infrastructure to provide vessels at berth with shore-side electrical power.

Alignment under CCM 6.17 is for instance related to the construction work on the Schiphol A-pier. It involves the construction and completion of a new, state-of-the-art passenger pier that will add 55.000 m² of space and eight new gates, including three suitable for the largest aircraft, making it Schiphol's most sustainable pier.

Under CCM 4.9 we have aligned several energy transition projects, for example IJmuiden Ver Beta and IJmuiden Ver Gamma - which refer to the construction of two converter stations, being built by our Dutch infrastructure business on the Maasvlakte, commissioned by TenneT. These converter stations form a crucial part of the Netherlands' offshore wind energy infrastructure.

The aligned revenue in CCM 7.4, CCM 7.5 and CCM 7.6 is mainly related to activities where BAM installs charging stations for electric vehicles, smart meters in buildings, maintenance and replacement of building services such as heating or ventilation systems and renewable energy technologies within buildings.

Capex - eligibility and alignment outcome

The proportion of Capital Expenditure (CapEx) in 2025 that is eligible-aligned is 30% (2024: 25%), 45% was eligible for, but not aligned with the EU taxonomy, and 25% of BAM's capex in 2025 was determined to be not eligible. Investments in 2025 that classify as aligned under the EU taxonomy include investments in equipment regarding the construction of BAM's aligned activities under climate change mitigation, mainly related to the rail infrastructure activities. BAM used a pro rata allocation to the economic activities for most capex investments, to determine eligibility and alignment for the year 2025.

The investments related to the residential houses and the sustainable timber housing are considered to be fully aligned under the EU taxonomy, on the basis that revenue related to these residences can be aligned. Also the amount of investments for BAM's own buildings are not pro rata allocated to the economic activities, but reported on CCM 7.7 Acquisition and ownerships of buildings. BAM assessed the investments in their own buildings on alignment. These investments are eligible under CCM 7.7 and 41% of them is aligned on this EU taxonomy activity.

Opex - eligibility and alignment outcome

The proportion of Operational Expenditure (OpEx) in 2025 that is eligible-aligned is 30% (2024: 49%), 42% was eligible for, but not aligned with the EU taxonomy, and 28% of BAM's opex in 2025 was determined to be not eligible.

As the opex definition in the EU taxonomy is very narrow, this KPI is less significant in the light of BAM's business model. The percentages are estimated based on a pro-rata basis related to the revenue of the aligned economic activities in order to determine eligibility and alignment for the operational expenditures in 2025.

Operational expenditure in 2025 that classifies as eligible-aligned with the EU taxonomy, include for example the short term lease expenses, pro rata, of BAM's rail business and R&D expenses for aligned activities.

Verification of compliance with minimum social safeguards

BAM has verified that the eligible economic activities are carried out in compliance with the minimum social safeguards, including the human right due diligence process and risk assessment for BAM. The following topics have been identified:

- Human right policies;
- Human right impacts;
- Human right communications;
- Grievance mechanisms;
- Consumer interests;
- Bribery and corruption;
- Fair competition;
- Taxation.

BAM assessed the steps of the due diligence process described in the minimum social safeguard requirements.

- Embed responsible business conduct into policies and management systems;
- Identify and assess adverse impacts in operations, supply chains and business relationships;
- Cease, prevent or mitigate adverse impacts;
- Track implementation and results;
- Communicate how the topics and related measures are addressed.

Further details on human rights due diligence processes are included in chapter 6.4.

Eligible and aligned activities per objective and disclosure of specific activities

Proportion table shows that most of the aligned revenue of BAM is contributing to the EU taxonomy objective of climate change mitigation. BAM's revenue is eligible on the objectives climate change mitigation, climate change adaptation and the transition to a circular economy. The table also shows the proportion of capex and opex that is aligned and eligible per objective.

Proportion Table of Revenue, Capex and Opex

	Proportion of revenue/ Total revenue		Proportion of capex/Total capex		Proportion of opex/Total opex	
(in%)	Taxonomy-aligned per objective	Taxonomy-eligible per objective	Taxonomy-aligned per objective	Taxonomy-eligible per objective	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM	30	72	30	75	30	72
CCA	0	71	0	74	0	72
WTR	0	0	0	0	0	0
CE	0	41	0	24	0	42
PPC	0	0	0	0	0	0
BIO	0	0	0	0	0	0

Proportion of revenue associated with EU taxonomy-aligned economic activities – disclosure covering 2025*

				Substantial contribution to						Do no significant harm to									
Economic Activities	Code	Revenue	Proportion of revenue, year 2025	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Minimum safeguards	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) revenue, year 2024	Category enabling activity	Category transitional activity
		€/mln.	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1 - Environmentally sustainable activities (Taxonomy-aligned)																			
Transmission and distribution of electricity	CCM 4.9	40	0.6%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	E	
Infrastructure for rail transport	CCM 6.14	1,183	16.8%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	16.9%	E	
Infrastructure enabling low carbon water transport	CCM 6.16	5	0.1%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.2%	E	
Low carbon airport infrastructure	CCM 6.17	15	0.2%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	E	
Construction of new buildings	CCM 7.1	754	10.7%	Y	N	N/EL	N/EL	N	N/EL	Y	Y	Y	Y	Y	Y	Y	6.8%		
Renovation of existing buildings	CCM 7.2	101	1.4%	Y	N	N/EL	N/EL	N	N/EL	Y	Y	Y	Y	Y	Y	Y	2.3%		T
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	19	0.3%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.4%	E	
Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	CCM 7.5	6	0.1%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.1%	E	
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	1	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	E	
Revenue of environmentally sustainable activities (Taxonomy-aligned) (A.1)		**2,123**	**30.1%**	30.1%	0.0%	0.0%	0.0%	0.0%	0.0%	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**26.7%**		
Of which Enabling		1,268	18.0%	18.0%	0.0%	0.0%	0.0%	0.0%	0.0%	Y	Y	Y	Y	Y	Y	Y	17.6%	E	
Of which Transitional		101	1.4%	1.4%						Y	Y	Y	Y	Y	Y	Y	2.3%		T
A.2 - Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
				EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL										
Water supply	WTR 2.1	11	0.2%	N/EL	N/EL	EL	N/EL	N/EL	N/EL							Y	0.0%		
Transmission and distribution of electricity	**CCM 4.9**/CCA 4.9	633	9.0%	EL	EL	N/EL	N/EL	N/EL	N/EL							Y	3.9%		
Infrastructure for personal mobility, cycle logistics	**CCM 6.13**/CCA 6.13	12	0.2%	EL	EL	N/EL	N/EL	N/EL	N/EL							Y	0.0%		
Construction of new buildings	**CCM 7.1**/CCA 7.1/CE 3.1	1,419	20.2%	EL	EL	N/EL	N/EL	EL	N/EL							Y	25.0%		
Renovation of existing buildings	**CCM 7.2**/CCA 7.2/CE 3.2	622	8.8%	EL	EL	N/EL	N/EL	EL	N/EL							Y	7.2%		
Installation, maintenance and repair of energy efficiency equipment	**CCM 7.3**/CCA 7.3	231	3.3%	EL	EL	N/EL	N/EL	N/EL	N/EL							Y	2.1%		
Others (<10 million)*		12	0.2%	EL	EL	N/EL	N/EL	N/EL	N/EL							Y	3.3%		
Revenue of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		**2,941**	**41.8%**	41.6%	41.6%	0.2%	0.0%	29.0%	0.0%							**Y**	**41.5%**		
A. Revenue of Taxonomy-eligible activities (A.1+A.2)		**5,064**	**71.9%**	71.8%	41.6%	0.2%	0.0%	29.0%	0.0%							**Y**	**68.2%**		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
Revenue of Taxonomy-non-eligible activities (B)		**1,976**	**28.1%**																
TOTAL		**7,040**	**100.0%**																

The category other contains the activities WTR 2.2, WTR 2.3, CCM 4.27, CCM 4.3, CCM 4.15, CCM 5.1, CCM 5.2, CCM 5.3, CCM 7.4, CCM 7.5, CCM 7.6. On these activities is less then 10 mln euro revenue eligible.

Proportion of capex associated with EU taxonomy-aligned economic activities – disclosure covering 2025

Economic Activities	Code	capex	Proportion of capex, year 2025	Substantial contribution to: Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Do no significant harm to: Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Minimum safeguards	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) capex, year 2024	Category enabling activity	Category transitional activity
		€/mln.	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1 - Environmentally sustainable activities (Taxonomy-aligned)																			
Transmission and distribution of electricity	CCM 4.9	2	0.9%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	E	
Infrastructure for rail transport	CCM 6.14	48	23.2%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	18.1%	E	
Infrastructure enabling low carbon water transport	CCM 6.16	0	0.1%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.5%	E	
Low carbon airport infrastructure	CCM 6.17	1	0.3%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	E	
Construction of new buildings	CCM 7.1	5	2.6%	Y	N	N/EL	N/EL	N	N/EL	Y	Y	Y	Y	Y	Y	Y	2.6%		
Renovation of existing buildings	CCM 7.2	1	0.3%	Y	N	N/EL	N/EL	N	N/EL	Y	Y	Y	Y	Y	Y	Y	0.7%		T
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	3	1.3%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	1.1%	E	
Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	CCM 7.5	1	0.4%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.2%	E	
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	0	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.0%	E	
Acquisition and ownership of buildings	CCM 7.7	2	0.8%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	2.3%		
Capex of environmentally sustainable activities (Taxonomy-aligned) (A.1)		**61**	**29.7%**	30.9%	0.0%	0.0%	0.0%	0.0%	0.0%	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**25.4%**		
Of which Enabling		54	26.1%	26.1%	0.0%	0.0%	0.0%	0.0%	0.0%	Y	Y	Y	Y	Y	Y	Y	19.8%	E	
Of which Transitional		1	0.3%	0.3%						Y	Y	Y	Y	Y	Y	Y	0.7%		T
A.2 - Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
				EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL										
Transmission and distribution of electricity	**CCM 4.9**/CCA 4.9	16	7.6%	EL	EL	N/EL	N/EL	N/EL	N/EL							Y	5.4%		
Infrastructure for rail transport	CCM 6.14	28	13.6%	EL	EL	N/EL	N/EL	N/EL	N/EL							Y	0.8%		
Construction of new buildings	**CCM 7.1**/CCA 7.1/CE 3.1	31	15.0%	EL	EL	N/EL	N/EL	EL	N/EL							Y	12.7%		
Renovation of existing buildings	**CCM 7.2**/CCA 7.2/CE 3.2	12	6.0%	EL	EL	N/EL	N/EL	EL	N/EL							Y	3.5%		
Installation, maintenance and repair of energy efficiency equipment	**CCM 7.3**/CCA 7.3	4	1.7%	EL	EL	N/EL	N/EL	N/EL	N/EL							Y	4.3%		
Others (<1 million)*		2	1.1%	EL	EL	N/EL	N/EL	N/EL	N/EL							Y	0.7%		
Capex of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		**93**	**45.0%**	44.4%	44.4%	0.0%	0.0%	20.6%	0.0%							**Y**	**55.0%**		
A. Capex of Taxonomy-eligible activities (A.1+A.2)		**155**	**74.8%**	75.2%	44.4%	0.0%	0.0%	20.6%	0.0%							**Y**	**80.4%**		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
Capex of Taxonomy-non-eligible activities (B)		**52**	**25.2%**																
TOTAL		**207**	**100.0%**																

* The category other contains the activities where less then 1 million euro capex is eligible.

Proportion of opex associated with EU taxonomy-aligned economic activities – disclosure covering 2025*

				Substantial contribution to						Do no significant harm to								
Economic Activities	Code	opex	Proportion of opex, year 2025	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Minimum safeguards	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) opex, year 2024	Category enabling activity	Category transitional activity
		€/mln.	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1 - Environmentally sustainable activities (Taxonomy-aligned)																			
Infrastructure for rail transport	CCM 6.14	11	16.8%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	48.6%	E	
Construction of new buildings	CCM 7.1	7	10.7%	Y	N	N/EL	N/EL	N	N/EL	Y	Y	Y	Y	Y	Y	Y	0.3%		
Renovation of existing buildings	CCM 7.2	1	1.4%	Y	N	N/EL	N/EL	N	N/EL	Y	Y	Y	Y	Y	Y	Y	0.1%		T
Others (<1 million)*		1	1.2%	Y	N	N/EL	N/EL	N	N/EL	Y	Y	Y	Y	Y	Y	Y			
Opex of environmentally sustainable activities (Taxonomy-aligned) (A.1)		**20**	**30.2%**	30.2%	0.0%	0.0%	0.0%	0.0%	0.0%	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**49.6%**		
	Of which Enabling	11	16.8%	16.8%	0.0%	0.0%	0.0%	0.0%	0.0%	Y	Y	Y	Y	Y	Y	Y	48.6%	E	
	Of which Transitional	1	1.4%	1.4%						Y	Y	Y	Y	Y	Y	Y	0.1%		T
A.2 - Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
				EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL										
Transmission and distribution of electricity	**CCM 4.9**/CCA 4.9	6	9.0%	EL	EL	N/EL	N/EL	N/EL	N/EL							Y	3.8%		
Construction of new buildings	**CCM 7.1**/CCA 7.1/CE 3.1	14	20.2%	EL	EL	N/EL	N/EL	EL	N/EL							Y	6.9%		
Renovation of existing buildings	**CCM 7.2**/CCA 7.2/CE 3.2	6	8.8%	EL	EL	N/EL	N/EL	EL	N/EL							Y	0.0%		
Installation, maintenance and repair of energy efficiency equipment	**CCM 7.3**/CCA 7.3	2	3.3%	EL	EL	N/EL	N/EL	N/EL	N/EL							Y	2.0%		
Others (<1 million)*		0	0.5%	EL	EL	N/EL	N/EL	N/EL	N/EL							Y	0.9%		
Opex of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		**28**	**41.8%**	41.8%	41.8%	0.0%	0.0%	29.0%	0.0%								**45.7%**		
A. Opex of Taxonomy-eligible activities (A.1+A.2)		**48**	**72.0%**	72.0%	41.8%	0.0%	0.0%	29.0%	0.0%								**95.3%**		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
Opex of Taxonomy-non-eligible activities (B)		**19**	**28.0%**																
TOTAL		**67**	**100.0%**																

* The category other contains the activities where less then 1 million euro opex is eligible.

6.7 Sustainability statement annex

Reference table

The sustainability statement complies with all aspects of ESRS.

Disclosure number	Disclosure requirement
General disclosures (ESRS 2)	
BP-1	General basis for preparation
BP-2	Disclosures in relation to specific circumstances
GOV-1	The role of the administrative, management and supervisory bodies
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
GOV-3	Integration of sustainability-related performance in incentive schemes
GOV-4	Statement on due diligence
GOV-5	Risk management and internal controls over sustainability reporting
SBM-1	Strategy, business model and value chain
SBM-2	Interests and views of stakeholders
SBM-3	Material impacts, risks and opportunities, and their interaction with strategy and business model
IRO-1	Description of the process to identify and assess material impacts, risks and opportunities
IRO-2	Disclosure requirements covered by the Sustainability statements
MDR-P	Policies adopted to manage material sustainability matters
MDR-A	Actions and resources in relation to material sustainability matters
MDR-M	Metrics in relation to material sustainability matters
MDR-T	Tracking effectiveness of policies and actions through targets

Disclosure number	Disclosure requirement
Climate change (ESRS E1)	
E1-1	Transition plan for climate change mitigation
ESRS 2 SBM-3	Material impacts, risks and opportunities, and their interaction with strategy and business model
ESRS 2 IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities
E1-2	Policies related to climate change mitigation and adaptation
E1-3	Actions and resources in relation to climate change policies
E1-4	Targets related to climate change mitigation and adaptation
E1-5	Energy consumption and mix
E1-6	Gross GHG emissions
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities
Pollution (ESRS E2)	
ESRS 2 IRO-1	Description of the processes to identify and assess material pollution-related impacts, risks and opportunities
E2-1	Policies related to pollution
E2-2	Actions and resources related to pollution
E2-3	Target related to pollution
E2-6	Anticipated financial effects from material pollution related risks and opportunities
Biodiversity (ESRS E4)	
E4-1	Transition plan for biodiversity
ESRS 2 SBM-3	Material impacts, risks and opportunities, and their interaction with strategy and business model
ESRS 2 IRO-1	Description of the processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities
E4-2	Policies related to biodiversity and ecosystems
E4-3	Actions and resources in relation to biodiversity and ecosystem
E4-4	Targets related to biodiversity and ecosystems
E4-5	Impact metrics related to biodiversity and ecosystems

Disclosure number	Disclosure requirement
Resource use and Circular economy (ESRS E5)	
ESRS 2 SBM-3	Material impacts, risks and opportunities, and their interaction with strategy and business model impacts, risks and opportunities
ESRS 2 IRO-1	Description of the processes to identify and assess material resource use and circular economy–related impacts, risks and opportunities
E5-1	Policies related to resource use and circular economy
E5-2	Actions and resources related to resource use and circular economy
E5-3	Targets related to resource use and circular economy
E5-4	Resource inflows
E5-5	Resource outflows
Own workforce (ESRS S1)	
ESRS 2 SBM-2	Interests and views of stakeholders
ESRS 2 SBM-3	Material impacts, risks and opportunities, and their interaction with strategy and business model
S1-1	Policies related to own workforce
S1-2	Processes for engaging with own workforce and workers' representatives about impacts
S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns
S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of actions
S1-5	Targets related to managing material negative impacts, advancing positive impacts and managing material risks and opportunities
S1-6	Characteristics of the undertaking's employees
S1-7	Characteristics of non-employee workers in BAM's own workforce
S1-9	Diversity metrics
S1-13	Training and skills development metrics
S1-14	Health and safety metrics
S1-16	Remuneration metrics (pay gap and total remuneration)
S1- entity-specific	Return on inclusion

Disclosure number	Disclosure requirement
Affected communities (ESRS S3)	
ESRS 2 SBM-2	Interests and views of stakeholders
ESRS 2 SBM-3	Material impacts, risks and opportunities, and their interaction with strategy and business model
S3-1	Policies related to affected communities
S3-2	Processes for engaging with affected communities about impacts
S3-4	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions (Taking action on social value)
S3-5	Targets related to managing material negative impacts, advancing positive impacts and managing material risks and opportunities
S3- entity-specific	Social value
Business conduct (ESRS G1)	
ESRS 2 GOV-1	Business conduct policies and corporate culture
ESRS 2 IRO-1	Material impact, risk or opportunity
G1-1	Business conduct policies and corporate culture
G1-3	Prevention and detection of corruption and bribery
G1-4	Incidents of corruption or bribery
G1- entity-specific	Protection of data and respecting privacy

List of data points that derive from other EU legislation

ESRS standard	Data point that derives from other EU legislation
General disclosures	
General disclosures (ESRS 2)	GOV-1 Board's gender diversity
	GOV-1 Percentage of board members who are independent
	GOV-4 Statement of due diligence
Environmental disclosures	
Climate change (E1)	E1-1 Transition plan to reach carbon neutrality by 2050
	E1-1 Undertakings excluded from Paris-aligned Benchmarks
	E1-4 GHG emission reduction targets
	E1-5 Energy consumption and mix
	E1-6 Gross scope 1, 2, 3 and total GHG emissions
	E1-6 Gross GHG emissions intensity
Social disclosures	
Own workforce (S1)	S1-1 Human rights policy commitments
	S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8
	S1-14 Number of fatalities and number and rate of work-related accidents
	S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)
	S1-16 Unadjusted gender pay gap
Governance disclosures	
Business conduct (G1)	G1-1 United Nations Convention against Corruption
	G1-4 Fines for violation of anti-corruption and anti-bribery laws

Other data points listed in ESRS 2 Appendix B, which are not included in the table above, are considered either not material or not relevant.