

# Code of Conduct for Supply Chain Partners

## Introduction

This Code of Conduct for Supply Chain Partners (hereinafter "Code of Conduct") sets out the requirements for suppliers, designers, engineers, contractors, agents, consultants, consortium-, joint venture- and any other business partners (hereinafter "Supply Chain Partners") based on Van Oord's own code of conduct applicable to its employees, subsidiaries and joint ventures controlled by Van Oord.

Van Oord views the content and compliance with this Code of Conduct or explicitly agreed equivalent standard as material and an integral part of our business relationship with the respective Supply Chain Partner.

## What we expect from our Supply Chain Partners:

Compliance with Laws and Code of Conduct

Supply Chain Partners shall comply with all applicable laws, rules and regulations in the countries where they operate

Van Oord requires its Supply Chain Partners to comply with this Code of Conduct.

Considering the size and nature of their business, we also expect our Supply Chain Partners to have management systems in place which ensure compliance with applicable laws and regulations.

## Anti-Bribery and Corruption

Supply Chain Partners may not directly or indirectly partake in any form of corruption or bribery and shall ensure that business decisions are not influenced through any improper or illegal benefits, e.g. through payments, gifts, "kickbacks" or any other improper inducements.

Supply Chain Partners must refrain from presenting any invitations or gifts, or anything of value, to Van Oord employees with an intention to gain any form of influence.

Supply Chain Partners shall be intolerant of corrupt activity and have appropriate and adequate procedures to prevent such activity from taking place.

## International Trade Compliance – Trade Sanctions and Customs Regulations

We expect our Supply Chain Partners to conduct business in compliance with all applicable laws, regulations and sanctions governing:

- Export, re-export, import of goods, products, technical data, software and services; and
- Economic and trade sanctions, embargoes and anti-boycott.

## Anti-Trust and Competition

We expect our Supply Chain Partners to conduct business in accordance with all applicable competition and anti-trust laws and regulations. Our Supply Chain Partners shall not enter into formal or informal anti-competitive arrangements, activities, discussions or agreements concerning pricing, market sharing or other similar activities, which could be construed as being anti-competitive, improperly restrict competition, abusive or unfair.

## Conflicts of Interest

Our Supply Chain Partners shall avoid conflicts of interest or situations where their own interests' conflict, or could conflict, with the business interests of Van Oord.

It is understood that such actual or potential conflicts do arise in the course of business from time to time, in which case we expect our Supply Chain Partners to disclose them to Van Oord without delay.



## Accurate Record Keeping

Our Supply Chain Partners must, in a timely manner, in accordance with applicable laws and regulations, accurately and securely prepare, capture, store, and maintain, business books and records reflecting all business transactions and expenditures.

Our Supply Chain Partners shall, at their own expense, at any time requested by Van Oord, make records that relate to business transactions with Van Oord available for inspection and audit by Van Oord (including copies thereof).

## Personal, Confidential and Proprietary Information

We expect our Supply Chain Partners to protect all sensitive information, including confidential, proprietary and protected personal information. Information should not be used for any purpose other than the business purpose for which it was provided without prior authorisation.

Where such information is held or transferred electronically, we expect our Supply Chain Partners to implement appropriate IT cyber security and to notify us of any suspected or actual data breaches.

We expect our Supply Chain Partners to comply with all applicable intellectual property rights and data privacy laws.

## Personal Conduct – Workplace/ Employees

Van Oord's Supply Chain Partners have a duty to provide a safe workplace that complies with international labour standards, are expected to ensure the wellbeing of their staff where individuals are treated with dignity and respect and shall not discriminate, especially not on grounds of ethnicity, gender, sexual orientation, religion, ideology, disability or age.

Van Oord's Supply Chain Partners shall:

- i. ensure fair employment practices; and
- ii. refrain from any form of unethical or illegal behaviour, such as but not limited to harassment, discrimination,

intimidation, humiliation, sexual or physical assault, abusive conduct, any form of slavery, trafficking of persons, servitude of forced or bonded or compulsory labour; and

- iii. ensure that any form of child labour is not used; and
- iv. oppose practices which inhibit the development of children; and
- v. ensure that employees may perform work in an environment that is free from harassment or other unethical or illegal behaviour.

We expect our Supply Chain Partners to comply with applicable laws and regulations on pay, benefits, working hours, health and safety, the rights of individuals to join trade unions and participate in collective bargaining or alternative form of independent and free workers representation and they shall provide employees with written employment agreements as governed by local legislation.

We expect our Supply Chain Partners to provide employees and third parties with access to adequate reporting channels to seek advice or raise legal concerns or concerns about unethical conduct in the workplace. We expect our Supply Chain Partners to take action to prevent, detect and correct retaliatory actions against these reporters.

## Alcohol and Drugs

Being under the influence of alcohol or drugs can seriously impair an individual's judgement and reactions leading to an increased risk of accidents and injuries occurring.

It is for this reason that Van Oord has an Alcohol and Drugs Policy in place.

We expect our Supply Chain Partners to adhere to our policy or alternatively their own similar policy.



## Quality, Health, Safety and Environment ('QHSE')

Van Oord expects a strong commitment to QHSE management.

We expect our Supply Chain Partners to help us fulfil our QHSE goals.

We expect our Supply Chain Partners to actively manage QHSE risks.

Supply Chain Partners shall seek to create and ensure a safe and healthy working environment with no injuries, no work-related ill-health, no environmental incidents and prevent or minimise negative impact of its works and services.

We expect our Supply Chain Partners to manage their operations responsibly in relation to environmental risks and impacts and shall in particular be committed to the following:

- i. compliance with applicable environmental statutory rules and regulations;
- ii. prevention or limitation, as much as possible, of soil, water and air pollution, the production waste products and hazardous materials;
- iii. separate collection and processing of waste and efficient use of water and energy;
- iv. raising environmental awareness of its employees and making it a priority;
- v. consider setting-up and applying an environmental management system in accordance with requirements of the ISO 14001 (Environmental Management Systems) norm.

## Corporate and Personal Integrity

In addition to the standards set out in this Code of Conduct, Van Oord is committed to the respect for human rights set out in the United Nations Declaration of Human Rights and we endorse the principles set out in the UN Global Compact's Ten Principles and the OECD Guidelines for Multinational Enterprises.

We expect our Supply Chain Partners to act in a manner supportive of our commitment in this regard.

## Protection of assets

Van Oord's Supply Chain Partners shall contribute to safeguard Van Oord's assets from theft, misuse or waste.

## Community relations

Van Oord's Supply Chain Partners shall respect the rights, interests and development goals of communities and shall consult with communities potentially affected by the business of the respective Supply Chain Partner and avoid causing or contributing to negative impacts on their human rights.

## Van Oord's other policies

The latest version of any document or policy referred to herein, shall be deemed to form, be read and construed as an integral part of this Code of Conduct. They will be provided to the Supply Chain Partner at his request.

Rotterdam, 12 August 2021

On behalf of the Executive Committee

Pieter van Oord  
CEO

Pieter van Oord  
Jolanda Poots-Bijl  
Maurits den Broeder  
Arnoud Kuis  
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