

HUMAN RIGHTS AND LABOUR POLICY

OWN WORKFORCE



JANDENUL.COM



Document control

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Review and approval

Responsible	Content reviewer	Approver
KDG	RHA	KDG

Endorsed for application within Jan De Nul Group by	Date
Director : P. Lievens	05-Nov-2024
Director : F. Buyle	05-Nov-2024

Reference documents

Reference	Title
JDN controlled documents	
JDN-POL-0003	Code of Conduct
JDN-RPT-0004	Modern slavery statement
JDN.QF.01.43	Bullying and harassment policy
JDN.GF.01.47	Diversity and inclusion policy
JDN-POL-0004	Sustainability Policy
JDN-POL-0001	QHSSE Policy

Reference	Title
JDN-POL-0019	Human Rights and Labour Policy – Value chain
Standards	
UDHR	United Nations Universal Declaration of Human Rights
	International Labour Organization's (ILO) Declaration on Fundamental Rights and Principles at Work
UNGPs	UN Guiding Principles on Business and Human Rights
	OECD Guidelines for Multinational Enterprises
ISO45001	Occupational Health and Safety Management Systems
ISM	International Safety Management
ISPS	International Ship and Port Facility Security

Definitions

Definition	Meaning
Employee	"Employee = Worker "Worker" is defined as "person performing work or work-related activities that are under the control of the organization." Any reference in the below text to 'an employee' also applies to associates, management and directors.
Jan De Nul Group	Jan De Nul Group means Sofidra SA and all of its affiliated companies.

Abbreviations

Abbreviation	Meaning
ILO	International Labour Organisation
OECD	Organisation for Economic Co-operation and Development
QHSE	Quality, Health, Safety, Security & Environment



Purpose

The purpose of this document is to provide all personnel at Jan De Nul Group, its value chain with the commitments and actions the company takes up in the view of human rights in its operations. This document contains the Statement of Intent and Objectives agreed upon by the Board of Directors, the scope to whom this policy applies, the commitments of provision and prevention and how we implement these.

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1 Statement of intent – objectives

In line with our vision, mission and values, taking into account the interests of our stakeholders, we commit to respecting all internationally recognised human rights and applicable standards. We strive to prevent, end and mitigate adverse impacts on human rights within our business operations around the world. We expect our business partners to do the same.

The Jan De Nul Group Own Workforce Human Rights and Labour Policy (the “Policy”) formalizes our commitment to respect all human rights and labour standards reflected in international principles and standards, including:

- United Nations Universal Declaration of Human Rights,
- International Labour Organization's (ILO) Declaration on Fundamental Rights and Principles at Work,
- UN Guiding Principles on Business and Human Rights (UNGPs),
- OECD Guidelines for Multinational Enterprises,
- the laws of the countries in which we operate.

In case there is a difference between this policy and local laws or policies, the stricter rules prevail.

2 Scope

2.1 Implementation scope

Policy to be implemented by		Geographical boundary
Companies of Jan De Nul Group	all companies of Jan De Nul Group	Worldwide
Supply chain of Jan De Nul	Advised	
Clients of Jan De Nul	advised	

2.2 Information scope

Policy may be communicated to any third party without any restrictions, for informative purposes.

3 Commitments

Jan De Nul Group commits to providing a safe and just working environment and preventing illegal and immoral activities at our sites, offices and on our projects. In the following chapters, we describe our stance on the subjects listed below:

We commit to providing	We commit to preventing
<ul style="list-style-type: none"> • A safe and healthy workplace • Freedom of association, the right to collective bargaining • Fair wages and working hours • Fair treatment and non-discrimination 	<ul style="list-style-type: none"> • Child labour • Forced labour and modern slavery • Undesirable behaviour in the workplace

3.1 A safe and healthy workplace

Our personnel are the greatest asset to Jan De Nul Group. Therefore, we place a high importance to safe and healthy working conditions for all our employees. To guarantee this, we established a structured Health & Safety Management System (H&S) that has been certified by an accredited certification body according to the ISO 45001 standard. Furthermore, all convention-size vessels of Jan De Nul Group are ISM and ISPS certified.

The H&S Management System serves to maintain all occupational health and safety matters to the highest standards possible. These include the free availability of sanitary facilities, drinking water, safety equipment and training resources.

All employees involved in the works participate in safety meetings, which are organised to involve all personnel in all practical H&S issues. During these meetings, employees can make recommendations for improving procedures and processes in view of enhancing productivity and efficiency.

Mental health is as important as physical health, which is why we value the right to disconnect during downtime.

3.2 Freedom of association and rights to collective bargaining

Employees within Jan De Nul Group have the freedom of peaceful assembly and the freedom of association with others, including the right to form and join trade unions for the protection of their interests. We make all the necessary premises and equipment available to the consultative body, which meets on a regular basis.

We expect our stakeholders to respect trade union membership and activities without any discrimination. If rights are limited locally, we expect our business partners to seek for alternative ways to promote an effective employee-employer relationship.

3.3 Fair wages and reasonable working hours

Jan De Nul Group adheres to the relevant national requirements and agreed industry standards regarding wages and working hours.

Fair wages

We respect the employees' home country national laws on salary requirements and labour conditions at all times.

The key issues of our remuneration policy are:

- Identification and compliance with local / national minimum requirements as established by the law and as mentioned in the employees' employment agreement;
- The national / regional minimum wage of the employees' home country is respected as a minimum;
- Legally required social benefits such as medical care and accident insurance are covered by the employer;
- Jan De Nul Group ensures that the wages also meet the basic needs of its employees to allow them and their dependents to afford adequate housing, food, and other necessities in their home country;
- Wages are paid in a timely manner and our employees receive a detailed pay slip, including wage calculation details.

Working hours

Jan De Nul Group only applies legally allowed working time schedules in line with the national requirements of their respective companies. The main consideration is that work schedules, facilities and processes are designed to allow employees the opportunity to get sufficient rest and relaxation to be able to perform their duties in a safe and qualitative manner.

In our company, there are work schedules that differ from the main regulations, for example in case of very specific operational requirements or in emergency situations. In this context, our dredging/offshore works require extended working hours and a continuous work schedule. However, the generally applicable minimum hours of rest for crew members on board still meet the guideline limits of ILO's Maritime Labour Convention of 2006. Our operational procedures and workplace arrangements are based on this schedule as well.

Jan De Nul Group establishes specially adapted and well-balanced leave schedules for its expatriate employees in accordance with international industry practices. It allows expatriates to maintain a good work/private life balance, in harmony with their families and social life. All employees have the right to periodic leave and paid holidays.

3.4 Fair treatment and non-discrimination

We strongly believe in the principles of equal opportunities and value, and therefore promote diversity in all areas of recruitment, employment, training and promotion. All of our employees have the opportunity to develop their full potential, irrespective of their race, gender or personal circumstances.

Our system is based on merit, which we deem important because:

- We want to appeal to talented people
- We want to offer the best possible service to our clients
- A diverse company is a more innovative and successful company
- People who are treated fairly are more productive and feel more appreciated.

3.5 Child labour

Jan De Nul Group does not tolerate child labour and will also take appropriate measures in case child labour or abuse is suspected either within its own organisation or within its value chain, or any other third party we do business with.

Such cases are reported to the Project Management and the respective HR Department and an investigation will be initiated. For this reason, no children (younger than 18) will be employed on any project of Jan De Nul Group, unless this is part of a lawful job training or apprenticeship programme.

3.6 Forced labour and human trafficking

Jan De Nul Group does not tolerate any form of human trafficking, forced labour or slavery, neither within its own organisation nor within its value chain or any other third parties it does business with.

We take concrete steps to tackle modern slavery. We provide training for management and all employees, regularly review this policy and check internal and external compliance and implement strategies to mitigate risks and measure performance. This way, Jan De Nul Group guarantees that working conditions are, as a minimum, in accordance with national and international requirements.

Jan De Nul Group only employs personnel based on a contract that is mutually agreed upon and does not make use of forced labour or slavery in any form. According to our internal procedures, every employee will comply with all legal requirements in performing their job. Furthermore, all employees within Jan De Nul Group have the duty to report these malpractices, whether in our own operations or those of our suppliers or subcontractors, to the Project Management and the respective HR Department in view of further investigation.

Jan De Nul complies with the Modern Slavery Act 2015 and publishes an annual Modern Slavery statement.

3.7 Undesirable workplace behaviour

Jan De Nul Group does not accept any form of undesirable behaviour such as (sexual) harassment, aggression, violence, discrimination, bullying etc.

This includes unreasonable and inappropriate behaviour, either direct or indirect (e.g. social media), whether verbal, physical or otherwise, towards an employee or group of employees which creates a risk to an employee's mental or physical health and safety.

4 Complaints and due diligence

Jan De Nul Group encourages everyone to report labour and human rights violations. This can be done by contacting the project management or the confidential mediator of Jan De Nul Group.

Jan De Nul Group is fully committed to carefully study and resolve all reported complaints. We will not tolerate actions against an employee for filing a justified complaint.

Complaints received inform the due diligence of Jan De Nul Group and are evaluated on the basis of the risk positions selected, their materiality and likelihood.

5 Implementation

Implementation by Jan De Nul

This policy is communicated via :	https://www.jandenul.com/sustainability-policies Internal platform Connect
This policy is implemented by means of:	The implementation of this Policy is embedded into the Jan De Nul Group's sustainability due diligence, which is the process to identify, prevent, mitigate and account for addressing actual and potential adverse impacts in its own operations, its supply chain and other business relationships. This due diligence is being embedded into Jan De Nul Group's management systems. Furthermore, it enables Jan De Nul Group to remediate adverse impacts that might be caused or to which Jan De Nul Group might contribute.
Responsibility of implementation of this policy is with:	Management HR Department
This policy is aligned with:	International principles and standards including the United Nations Universal Declaration of Human Rights; the International Labour Organization's (ILO) Declaration on Fundamental Rights and Principles at Work; the UN Guiding Principles on Business and Human Rights (UNGPs), as well as the OECD Guidelines for Multinational Enterprises
This policy will be evaluated, reviewed and updated :	On a regular basis to ensure that it reflects relevance, stakeholder input, changing circumstances, changing legislation, amended certifications, new knowledge and opportunities for Jan De Nul Group.