

# HUMAN RIGHTS AND LABOUR POLICY

VALUE CHAIN



JANDENUL.COM

# Document control

## Document information

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Revision	Date	Description and location of changes
00.00	28-Oct-2024	New document

## 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
<b>JDN controlled documents</b>	
JDN-POL-0003-en	Code of Conduct
JDN-RPT-0004	Modern slavery statement
JDN.QF.01.43.e	Bullying and harassment policy
JDN.GF.01.47.e	Diversity and inclusion policy
JDN-POL-0004	Sustainability Policy
JDN-POL-0001	QHSSE Policy

Reference	Title
JDN-POL-0018	Human Rights and Labour Policy – Own workforce
<b>Standards</b>	
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
Client	Principal or end-user
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.
Supplier	The party that delivers or provides a service / product / activity to Jan De Nul Group, related to the project.
Value chain	Suppliers and clients of Jan De Nul Group

## Abbreviations

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



# Purpose

This Value Chain Human Rights and Labour Policy sets the principles and expectations that ALL COMPANIES OF JAN DE NUL GROUP have regarding their upstream and downstream value chain.

The purpose of this document is to provide all personnel at Jan De Nul and value chain with the commitments and actions the company takes up in the view of human rights in Jan De Nul Group's value chain. 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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Sustainability department

# 1 Statement of intent – objectives

In line with our vision, mission and values, taking into account the interests of our stakeholders, we expect each Supplier and each Client to be responsible for learning the requirements provided by this Policy and operating in accordance with its provisions. Suppliers and Clients must stay informed of any changes to this Policy and/or to any relevant policies of Jan De Nul Group.

Jan De Nul Group commits to respecting all internationally recognised human rights and applicable standards in its own operations and its value chain. 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 Value Chain 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	complete supply chain of Jan De Nul	
Clients of Jan De Nul	all clients of Jan De Nul	

### 2.2 Information scope

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

## 3 Commitments

Jan De Nul Group expects its Suppliers and Clients to commit 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 expectations on the subjects listed below:

Our Suppliers and Clients must provide	Our Suppliers and Clients must prevent
<ul style="list-style-type: none"> <li>• A safe and healthy workplace</li> <li>• Freedom of association, the right to collective bargaining</li> <li>• Fair wages and working hours</li> <li>• Fair treatment and non-discrimination</li> </ul>	<ul style="list-style-type: none"> <li>• Child labour</li> <li>• Forced labour and modern slavery</li> <li>• Undesirable behaviour in the workplace</li> </ul>

### 3.1 A safe and healthy workplace

People are the greatest asset to a company. Therefore, we place a high importance to safe and healthy working conditions for all people involved.

Jan De Nul Group's value chain shall provide 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 expect our value chain to respect the right to disconnect during downtime.

### 3.2 Freedom of association and rights to collective bargaining

Employees of Jan De Nul Group's value chain must 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 expect our stakeholders to respect trade union membership and activities without any discrimination. If rights are limited locally, we expect our value chain 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's value chain must adhere to the relevant national requirements and agreed industry standards regarding wages and working hours.

#### Fair wages

Jan De Nul Group's value chain must respect the employees' home country national laws on salary requirements and labour conditions at all times.

The key issues of their remuneration policy shall be:

- 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;
- Wages must 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 employees receive a detailed pay slip, including wage calculation details.

#### **Working hours**

Jan De Nul Group's value chain shall only apply 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. 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 Jan De Nul Group value chain's employees must have the opportunity to develop their full potential, irrespective of their race, gender or personal circumstances.

### **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 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.

Jan De Nul Group's value chain may only employ personnel based on a contract that is mutually agreed upon and does not make use of forced labour or slavery in any form. Furthermore, we expect all employees within Jan De Nul Group's value chain to report these malpractices, whether in our own operations or those of our suppliers or subcontractors or clients, to the Project Management in view of further investigation.

Jan De Nul shall control compliance 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 team.

Jan De Nul Group is fully committed to carefully study and resolve all reported complaints. We will not tolerate actions against a person 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 <b>via</b> :	<a href="https://www.jandenul.com/sustainability-policies">https://www.jandenul.com/sustainability-policies</a> Internal platform Connect
This policy is implemented by <b>means</b> 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.  Also, this Policy is part of the agreements with Suppliers and Clients. Suppliers shall include these commitments in their agreements with their suppliers and control adherence to it.
<b>Responsibility</b> of implementation of this policy is with:	Management Global Procurement Department
This policy is <b>aligned</b> 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.