

## 1 Our commitment

At Jan De Nul Group, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain.

We take concrete steps to tackle modern slavery, as outlined in this statement:

- Training for management and all employees
- Regular review of, and adherence to, this statement and other internal policies on human and labour rights
- Agree and implement strategies to assess and mitigate risk and measure performance

## 2 Our business, organisational structure and supply chains

Jan De Nul Group shapes both water and land. We enable the production of offshore energy and maintain the depth of waterways. We build new ports and create extra land. We realise complex infrastructure works and erect any type of building. We tackle pollution in whatever form. For many generations already, the De Nul family invests in people and in having its own equipment. We have a passion for business but also want to do things our way, which gives us a unique edge within the sector.

Jan De Nul Group has its head office in Luxemburg located at Parc d'Activités Capellen 34 - 36, 8308 Capellen (Luxembourg). We have over 6000 employees and operate all over the world.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, and compliance with health, safety, social and environmental standards.

## 3 Relevant Policies

Jan De Nul Group operates a number of policies to ensure that we are conducting business in an ethical manner and with integrity in all our business relationships:

- Code of Conduct
- Social Accountability Policy
- QHSSE Policy Statement
- Sustainable Procurement Policy
- CSR Policy

<https://www.jandenul.com/partners-suppliers>

## 4 Whistleblowing

A process to report infringements is in place. It is mentioned in our code of conduct, and the existence and use of this reporting procedure is communicated at the end of the e-learning module of the Code of Conduct.

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

## 5 Supplier due diligence

Jan De Nul Group conducts due diligence on new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Comprehensive prequalification assessment in line with ISO standards
- Based on the outcome of the assessment and criticality of the supply / service, short listed companies could receive a compliance audit (before contract)
- Intermediate audits (follow-up audits) can be considered in the Vendors' premises, to ensure compliance with Jan De Nul Group requirements, applicable standards and local legislations.
- Adherence to our Supplier Code of Conduct including all underlying policies for our Strategic supplier base

## 6 Training

Jan De Nul Group is rolling out various trainings to all employees, which covers:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking
- How employees should respond if they suspect slavery or human trafficking
- Guidance of suppliers and subcontractors
- Identifying training needs for other members of staff
- Implementation and monitoring of the performed trainings

Senior management are responsible for implementing this statement and monitoring its use and effectiveness. It is made pursuant to section (54)1 of the Modern Slavery Act 2015 and constitutes the company's slavery and human trafficking statement.

9 May 2022



ir J.P.J. De Nul

Director

Jan De Nul Group (Sofidra S.A.)