



**POL-GAR-0013 General Code of Business  
Conduct**

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## 1. MISSION

Gardline's mission is to be best in class provider of geophysical, geotechnical and environmental surveys and related marine services to the offshore wind, oil and gas industry.

## 2. INTRODUCTION

Gardline, a wholly owned subsidiary of [Royal Boskalis Westminster N.V.](#), is a multidisciplinary marine survey company, providing a comprehensive range of marine services including geophysical, hydrographic, geotechnical, geochemical, environmental and oceanographic surveys. Gardline has grown to become one of the world's largest marine survey companies. Gardline's services are delivered across industry sectors with an interest in the marine environment, including wind, oil and gas operators, EPIC contractors, governments and public bodies, environmental consultants and telecommunication companies.

## 3. CHIEF EXECUTIVE OFFICER'S STATEMENT

Gardline is a responsible multinational enterprise. Our purpose is to create and protect welfare and to advance the energy transition. We play a pivotal role in keeping the world moving both on land and at sea. The areas where we can make the largest contribution, both to the world economy and sustainable development, are tied to our business, our people and our activities. The company is committed to sustainable profitability and value creation for its shareholders. Gardline wants to be an attractive employer and the client's first choice of contractor.

The Code of Conduct describes the guiding principles for our business conduct based on our core values, our commitment to our people, our clients, our investors, the environment and communities where we work. It describes our way of working and behaviour and has been designed to help all of us to make the right decisions in our daily work to improve our performance, build up trust with our stakeholders and safeguard our solid reputation.

As Board of Management we advocate the business principles embodied in our Code of Conduct and apply them in all our business activities. We expect all our colleagues to embrace them and to comply with the Code of Conduct in letter and spirit.

Gardline operates in a demanding and competitive climate which may lead to dilemmas or questions related to our business principles. If you face such dilemmas or questions or if you doubt your understanding of the Code of Conduct, please discuss them with your (direct) manager or contact our Compliance Office ([compliance.office@gardline.com](mailto:compliance.office@gardline.com)). Thank you for your commitment.

**Christiaan Vermeijden**  
**CEO**  
**Gardline Limited**

## 4. TO WHOM DOES THE CODE OF CONDUCT APPLY

The Code of Conduct applies to Gardline, its subsidiaries and all its employees performing work for Gardline throughout the world. This includes current employees and persons working for Gardline through an employment contract, as a (statutory) director, worker through an employment agency or as an intern. Any reference to 'you' in the Code of Conduct refers to persons in this group.

The principles embodied in the Code of Conduct are a fundamental part of the way we do business, and we promote the same principles in our relationships with clients, suppliers and other business partners.

## 5. WHAT ARE OUR PRINCIPLES

At Gardline we are committed to conduct our business with integrity, honesty and fairness. We do this in compliance with applicable international and national laws and this Code of Conduct. The Code of Conduct takes account of the interests of our various stakeholders. They include employees, shareholders and financial institutions, suppliers, clients, government bodies, educational and knowledge institutes, industry and society associations (including NGOs) and the communities in which Gardline operates.

### OUR CORE VALUES, OUR COMPASS

We strive to be the best in class provider of geophysical, geotechnical and environmental surveys and related marine services to the offshore wind, oil and gas industry, creating new horizons for all our stakeholders. Our five core values guide us in achieving this mission:

**SAFETY** Our people and their safety is the core of our success. Safety is the top priority in everything we do. Our behavioural safety program NINA targets No Injuries No Accidents to safeguard our colleagues and suppliers.

**TEAMWORK** By working together we create new horizons. We approach our complex and specialist work with a collective mindset and the objective to excel. Collaboration within teams and cooperating with clients, suppliers and other stakeholders allows us to get the job done.

**PROFESSIONALISM** We strive to achieve the best results for the job without making promises we cannot deliver. With our expertise and experience in project management, operations and risk management we seek to deliver our projects safely, on time and within budget.

**ENTREPRENEURSHIP** We offer innovative, competitive and sustainable solutions for our clients. With our strong business sense, we are forward thinking, exploring new ideas and opportunities. We take pride in creating new horizons.

**RESPONSIBLENESS** We are committed to conduct our business with integrity, honesty and fairness. Integrity is a prerequisite for success and an important cornerstone of our reputation. The impact of

our activities on society and the environment is a key element in the way we conduct our day-to-day business.

We apply the following guiding principles:

### **Business Principles.**

Gardline seeks to provide sustainable all-round solutions for infrastructural challenges in the maritime and coastal regions of the world and offers a broad range of maritime services to support the activities of the international energy and renewables sectors. In conducting our business:

- we provide our clients with advice on and/or the supply of high-quality services and products, which are as sustainable as possible, and support clients throughout the development and design of projects. We offer competitive market prices, execute contracts in accordance with the highest standards, whereby agreed deadlines are met and clients are provided with accurate and timely information.
- we realise a healthy return on capital for our shareholders, in proportion to the degree of risk within the industry and safeguard the company's continuity. As part of the Boskalis group, we take the necessary measures to prevent insider trading and to inform the financial markets of relevant accurate and factual information in good time. A more detailed description of our press and (social) media principles and links to relevant documents can be found in our internal External Communications procedure on the Gardline company intranet / Company Management System (CMS).
- we do not tolerate any bribery and corruption. We do not offer, pay, request or accept bribes, facilitation payments or any other favours for the purpose of acquiring or giving any improper business, financial or personal advantages. A more detailed description of our anti-bribery and anti-corruption principles can be found in our Anti-Bribery and Anti-Corruption Policy on the Gardline company intranet / CMS.
- we only allow the provision of reasonable gifts and hospitality by and to clients and business partners in the normal course of business in accordance with applicable laws and without the persuasion of favourable treatment.
- a more detailed description of our gifts and hospitality principles can be found in our Anti-Bribery and Anti-Corruption Policy on the company intranet / CMS.
- we do not make any contributions or donations, in money or in kind, to political parties, political officials or candidates for public office. You should not make any such political contributions or donation on behalf of Gardline.
- we do not perform any activities that are subject to international and/or national sanctions and do not have dealings with sanctioned persons. We follow the applicable laws concerning export control for military and dual use-goods and services.
- we operate in fair competition by complying with applicable competition laws.
- we respect and protect intellectual property rights.
- we avoid all situations in which personal or financial interests may conflict with the interests of Gardline or may interfere with an objective job performance.
- we seek to select our suppliers based on generally accepted market principles and in accordance with the provisions of our Supplier Code of Conduct. We seek to select suppliers which can advise us and/or supply us with high-quality services and products which are as sustainable as possible. We pay fair market prices and pay our suppliers on time in accordance with the agreements made and make reasonable demands of our suppliers. We aim for long-term, stable relationships with our suppliers in exchange for value, quality, competitiveness and reliability.
- we are a responsible taxpayer. We manage our tax affairs accurately and transparently to the letter and the spirit of the applicable tax laws and regulations.

## **Human Rights and Labour Principles.**

We respect and support the dignity, well-being and human rights of our employees, the communities we work in and everybody involved in our operations. In this respect:

- we are committed to comply with the principles of the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and applicable national and international labour laws, including the conventions of the International Labour Organization.
- we treat everybody in the course of our business with dignity, respect and fairness.
- we seek to identify adverse impacts related to human rights and labour caused by our business activities before they occur and take appropriate steps to avoid, minimize or mitigate them.
- we do not tolerate any form of forced or involuntary labour and any form of (modern) slavery or human trafficking and are committed to prevent these practices in our operations and projects.
- we do not tolerate child labour and apply the national laws on the applicable statutory minimum age for workers. We are committed to prevent child labour in our operations and projects.
- we respect the rights of our employees to the freedom of association and collective bargaining.
- we are supportive of establishing a work culture, based on trust and recognition, where employees put the Code of Conduct and its underlying policies in practice.
- we promote clear communications and are open to receive suggestions, ideas and criticism.
- we aim to prevent issues of conscience in the performance of duties and offer assistance to find proper solutions if such issues were to arise.
- we are committed to prevent undesirable conduct such as discrimination, harassment, bullying, intimidation and abuse of authority. As Gardline, we do not accept any discrimination, whether related to race, colour, nationality, ethnic background, age, religion, political opinion, gender, pregnancy, sexual orientation, marital status, disability, trade union membership, or any other characteristic protected by applicable law.
- we apply fair employment practices in every aspect of our business and offer good and competitive terms of employment worldwide.
- we commit that our employees receive a living wage that covers their and their family's basic needs in their home country.
- we apply applicable national legal requirements and agreed industry standards regarding wages and working hours.
- we are committed that all employees work on the basis of a freely agreed, written employment contract with clear terms and conditions in a language they understand.

A more detailed description of our human rights and labour principles can be found in our Human Rights and Modern Slavery and Human Trafficking Policies on the company Intranet / CMS.

## **Environmental and Social Principles.**

Gardline is committed to promoting sustainability including environmental and social principles as an integral part of our business. This commitment is founded in our ambition to contribute to the United Nations Sustainable Development Goals (SDGs). We align our business practices with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. In this light:

- we comply with the applicable national and international environmental and social laws.
- we pursue a policy aimed at preventing or limiting soil, water, light, noise and air pollution, the production or littering of waste products and the use of hazardous materials. This includes the

separate collection and processing of waste and efficient use of water and energy. Gardline has a zero oil spill ambition across all its activities.

- we respect the rights of communities where we work and are committed to being an active member of society. We recognize that community issues are key issues for our business and that we cannot operate independently of them.
- we make environmental and social risk management a priority. We seek to identify adverse environmental and social impacts caused by our business activities before they occur and take appropriate steps to avoid, cease, minimise or mitigate them.
- we encourage environmental awareness and motivation amongst our employees and others working on behalf of Gardline in such a way that protection of the environment and respect for communities is a priority for everyone.
- we optimize our environmental management system in accordance with the requirements of the ISO 14001 standard, with the aim of achieving continuous improvement in our environmental performance.

A more detailed description of our environmental principles can be found in our Environmental Management Policy on the company website ([www.gardline.com](http://www.gardline.com)) and intranet / CMS

### **Safety, health and quality principles**

Gardline strives to operate at the highest safety, health and quality levels.

- we ensure that safety and health are a top priority in everything we do. We take care of the safety, security and health of everyone involved in our activities, including the communities we work in. We show our commitment to prevent accidents. Gardline promotes and continuously improves safe and healthy working conditions through the safety behaviour program NINA (No Injuries No Accidents) and in accordance with the ISO 45001 standard.
- we optimize our occupational health and safety management system in accordance with the requirements of the ISO 45001 standard, with the aim of achieving continuous improvement in health and safety levels.
- we optimize our quality management through our Way of Working (“WoW”) program in accordance with the requirements of the ISO 9001 standard, with the aim of achieving continuous improvement in our business processes.
- we employ dedicated, professional, qualified and experienced staff
- we ensure that the fleet adheres to the International Safety Management Code.
- we support our activities with state-of-the-art equipment, efficient and integrated information- and communication technologies and innovative research- and development programs

## **6. POLICIES**

Gardline has elaborated upon certain important business principles in the following separate policies:

- the Anti-Bribery and Anti-Corruption Policy
- the Corporate and Social Responsibilities Policy
- the Environmental Management System Policy
- the Grievance Policy
- the Human Rights Policy
- the Labour Standards Policy
- the Modern Slavery and Human Trafficking Policy
- the IT and Communications Policy
- the Sanctions Policy
- the Whistleblowing Policy
- the Anti Facilitation of Tax Evasion Policy

These policies can be found on the Gardline website ([www.gardline.com](http://www.gardline.com)) and the company intranet / CMS.

## **7. WHAT IS EXPECTED FROM YOU**

### **COMPLIANCE WITH THE GARDLINE CODE OF CONDUCT IS ESSENTIAL IN THE DAY-TO-DAY BUSINESS OF GARDLINE**

Gardline therefore expects you to avoid any behaviour which constitutes a (potential) breach of the Code of Conduct and its underlying policies, regardless of the location and the local customs of the country where you are working and even if you think it would benefit the company.

## **8. HOW TO DEAL WITH BUSINESS PARTNERS**

We are committed to conduct business with integrity, honesty and fairness in compliance with applicable laws and the Gardline Code of Conduct. We expect our business partners, such as joint venture partners, suppliers and agents to do the same.

## **9. ACCOUNTABILITY AND GOVERNANCE**

The responsibility for the Gardline Code of Conduct and the compliance risks sits ultimately with the Board of Management.

Compliance with the Code of Conduct is monitored by management, the Compliance Office and through audits performed by the internal auditor.

The Board of Management and the Compliance Office review the content of the Gardline Code of Conduct on a yearly basis.

### **HOW TO REPORT (SUSPECTED) MISCONDUCT**

If you are an employee of Gardline and you believe that anyone who is involved in the business of Gardline is attempting to breach or has breached the Code of Conduct, you are expected to report this to your (direct) manager or in line with the Whistleblowing Policy.

The Whistleblowing Policy describes how Gardline offers our employees and directors the possibility to report any (suspected) misconduct within Gardline to a confidential and independent body without the risk of any retaliation. Such a report can be made anonymously and on a 24/7 basis.

The Whistleblowing Policy can be found on the company intranet / CMS.

## **10. HOW TO BRING FORWARD A GRIEVANCE**

External stakeholders who interact with Gardline activities worldwide, whether it is related to a project, a subsidiary or an employee, may bring a grievance forward to Gardline in line with our Grievance Policy.



The Grievance Policy describes how Gardline offers external stakeholders the possibility to report any grievance without the risk of retaliation. Your grievance may be treated on a confidential basis upon request and can be made anonymously on a 24/7 basis.

The Grievance Policy can be found on the Gardline company intranet / CMS

## **11. WHERE DO YOU FIND THE GARDLINE CODE OF CONDUCT**

The Gardline Code of Conduct is available on the Gardline Intranet / Company Management System (CMS)

## **12. WHERE CAN YOU LEARN MORE ON THE GARDLINE CODE OF CONDUCT**

All new employees receive a copy of the Code of Conduct when they start working with Gardline, and training on the Code of Conduct will be given as part of the Induction program.

From time to time you will receive invites for Gardline's "LearningLab" e-learning programs covering relevant aspects of the Code of Conduct. These programs are mandatory.

If you have any questions with regard to the Gardline Code of Conduct, you may always contact the Compliance Office ([compliance.office@gardline.com](mailto:compliance.office@gardline.com)).