

# GRIEVANCE POLICY



## **INTRODUCTION**

At Royal Boskalis and within our subsidiaries (together 'Boskalis') we are committed to conducting our business with integrity, honesty and fairness. We, being all Boskalis employees throughout the world, do this in compliance with applicable laws and the Boskalis Code of Conduct and its underlying policies.

Boskalis is a responsible multinational enterprise. Our purpose is to create and protect prosperity and advance the energy transition. Boskalis plays 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. Boskalis strives for open and clear communication with our various external stakeholders and is open to suggestions, ideas, complaints, grievances and criticism ('Grievance').

The Grievance Policy is developed in line with the criteria of the United Nations Guiding Principles on Business and Human Rights for effective grievance mechanisms, the IFC Performance Standards on Environmental and Social Sustainability and the OECD Guidelines for Multinational Enterprises.

The Grievance Policy describes how we offer our external stakeholders the possibility to bring forward any Grievance without the risk of any retaliation. Your Grievance may be treated on a confidential basis upon request and can be made anonymously on a 24/7 basis. Boskalis may implement more targeted grievance mechanisms on project level to ensure transparency and engagement with our local stakeholders. Such grievance mechanisms are based on the Grievance Policy.

## **TO WHOM DOES THIS POLICY APPLY**

The Grievance Policy applies to all external stakeholders that interact with Boskalis activities worldwide, whether it is related to a project, a subsidiary or an employee. It includes activities carried out on Boskalis' behalf by subcontractors or others. Activities carried out by our clients or their contractors, which are not related to our projects, are in principle not covered by the Grievance Policy and are referred to our client. Our external stakeholders include our shareholder(s) and financial institutions, suppliers, clients, government bodies, educational and knowledge institutes, industry and society associations (including NGOs) and the communities in which Boskalis operates. Any reference to 'you' in this policy refers to persons in this group.

Integrity, openness, honesty and fairness are fundamental principles of the way we do business, and we promote the same principles in our relationships with customers, suppliers and other business partners.

## **WHAT TO REPORT**

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

Grievances in relation to commercial or contractual matters fall outside the scope of the Grievance Policy. You are requested to take up any such issues directly with the responsible contact person within Boskalis or in accordance with the terms and conditions of the applicable contract. The same applies to Grievances of employees of Boskalis. If you are an employee of Boskalis, the Speak Up Policy is applicable to report any (potential) misconduct.

If you have any Grievance, you are requested to inform Boskalis as soon as possible, so it may be addressed in a timely and appropriate manner.

## WHERE & HOW TO REPORT

Boskalis offers different ways to bring your Grievance forward. It depends on the situation at hand and the seriousness of your Grievance, which person might be the most appropriate to discuss your Grievance with.

You are encouraged to raise your Grievance first with the relevant Boskalis contact person, because this is often the best way to resolve an issue swiftly in the spirit of open communication.

In case your Grievance is related to a specific project, your Grievance is to be addressed to the project manager or, where applicable, in accordance with the specific grievance mechanism for that project.

Please include in your Grievance report as many details as possible, including the following information:

- your full name (unless you wish to remain anonymous);
- the name of your organization (if any);
- your address, telephone number and/or (anonymous) e-mail address (at least one point of contact);
- the name of the project or activity your Grievance is related to;
- a detailed description of your Grievance (including any supporting evidence);
- a description of the discussions and actions already taken regarding your Grievance;
- any other relevant information;
- any requests of confidentiality.

Contact details are requested to make it possible to seek further clarification on the nature of the Grievance.

If you are not able to bring your Grievance forward (for instance if you do not know who the relevant Boskalis contact person is or your Grievance is not related to a project) or you do not feel comfortable to discuss your Grievance with the relevant Boskalis contact person or project manager, you may bring your Grievance formally forward to the Compliance Officer. The Compliance Officer may be reached by e-mail at [grievance@boskalis.com](mailto:grievance@boskalis.com).

You may bring your Grievance forward on an anonymous basis by sending an e-mail from an anonymous e-mail address. Boskalis recognizes that an anonymous report may be the only alternative in extraordinary circumstances, although in general it will be more difficult to handle the Grievance. Boskalis shall not try to find out the identity of the person submitting the Grievance anonymously.

The Grievance Policy is available in English, Dutch and Spanish. Project related grievance policies will be in English and the local language appropriate to the communities in which Boskalis operates that project. You may bring your project related Grievance forward in English or in that local language. You may bring your claim forward to the Compliance Officer in English, Dutch or Spanish.

All personal data provided under this Grievance Policy or a project specific grievance policy will be processed in accordance with applicable laws and the Boskalis Privacy Policy. By bringing a Grievance forward, you consent to the use of any personal data provided (including your identity, unless you have brought your Grievance forward on an anonymous basis) to treat your Grievance and for Boskalis, where necessary, to handle and remediate the issues related to your Grievance.

## HOW YOUR GRIEVANCE IS TREATED

The receipt of your Grievance Report will be confirmed by e-mail.

If so requested, your Grievance and your identity will be handled in complete confidence and will only be disclosed to those who need to know for the purposes of any treatment of your Grievance.

The relevant Boskalis contact person, the project manager or the Compliance Officer (whoever is involved) shall work in accordance with applicable laws, the Grievance Policy and the Boskalis Code of Conduct. All persons involved shall be treated with fairness, respect, objectivity and impartiality.

The relevant Boskalis contact person, the project manager or the Compliance Officer (whoever is involved) shall keep you informed of the developments with regard to the treatment of your Grievance, unless this is not allowed under applicable laws or otherwise not appropriate. The relevant Boskalis contact person, the project manager or the Compliance Officer (whoever is involved) shall inform you on the outcome and any recommendations regarding your Grievance, unless this is not allowed under applicable laws or otherwise not appropriate. Where possible you will be given the opportunity to respond to the outcome and recommendations. With regard to the outcome and recommendations Boskalis shall strive to take the necessary actions to remediate the substantiated Grievance.

## HOW WILL YOU BE PROTECTED

Boskalis will protect persons who have acted in good faith and ensure that they shall not suffer any retaliation or detriment as a consequence of bringing their Grievance forward.

## GOVERNANCE

Compliance with the Grievance Policy is monitored by the Compliance Officer and through audits performed by the internal auditor.

The Board of Management reviews the content of this policy with the Compliance Officer every two years.

## WHERE CAN YOU FIND THE GRIEVANCE POLICY

The Grievance Policy is available on the Boskalis website ([www.boskalis.com](http://www.boskalis.com)) and the Boskalis intranet (Bokanet).

## WHERE CAN YOU LEARN MORE ON THE GRIEVANCE POLICY

If you have any questions with regard to the Grievance Policy, you may always contact the Compliance Officer ([compliance.officer@boskalis.com](mailto:compliance.officer@boskalis.com)).

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**GENERAL DOCUMENT DATA**

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All printed copies of this Document are considered 'Uncontrolled Copies'. Go to [www.boskalis.com](http://www.boskalis.com) or the Bokanet site to find the current controlled version of this document. In the event of any discrepancies between the English version of this document and a translated version, the English document is binding.

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**REVISION STATUS**

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<b>Prepared by</b>	Else Buijs	Role: Compliance Officer
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