

# **SPEAK UP POLICY**



## **INTRODUCTION**

At Royal Boskalis and within our subsidiaries (together 'Boskalis') we are committed to conducting 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 to create a working climate in which employees are encouraged to put the Boskalis Code of Conduct into practice. In that respect it is important that communication between Boskalis and its employees is open and clear and that Boskalis is open to suggestions, ideas and criticism.

The Speak Up Policy is developed in line with applicable international and national laws and the OECD Guidelines for Multinational Enterprises.

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

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

The Speak Up Policy applies to Boskalis, its subsidiaries and all its employees performing work for Boskalis throughout the world. This includes current and former employees and persons working for Boskalis through an employment agreement, as a (statutory) director, worker through an employment agency or as an intern. 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 Speak Up Policy describes how Boskalis offers its employees and directors the possibility to report any (suspected) misconduct within Boskalis to a confidential and independent counselor without the risk of any retaliation. Such a report can be made anonymously and on a 24/7 basis. If you know or you suspect any (potential) misconduct, you are urged to make your report as soon as possible, so it may be addressed in a timely and appropriate manner. Examples of (potential) misconduct are issues which are not in line with applicable laws or the Boskalis Code of Conduct. These may be of a general, safety, financial, operational, social or employment nature, including but not limited to violation of health- and safety procedures, discrimination, racism, (sexual) abuse, fraud, bribery or other criminal acts and environmental misdemeanors.

## **WHERE & HOW TO REPORT**

Boskalis offers different ways to make your report in relation to (suspected) misconduct. It depends on the situation at hand and the seriousness of the (suspected) misconduct and which person might be most appropriate to discuss your concerns with. You are encouraged to raise your concerns first with your (direct) line manager or your manager Human Resources, because this is often the best way to resolve an issue swiftly in the spirit of open communication. If you are not able to do so or you do not feel comfortable to discuss your concerns with your (direct) manager or your manager Human Resources, you may report the (suspected) misconduct to the Boskalis Counselor.

The Boskalis Counselor is an independent counselor, who will treat any reports under this Speak Up Policy on a confidential basis. You can choose to make a report anonymously and you can also elect to make your report to a female counselor. The current female counselor is employed by the HR department. Notwithstanding her position, the female counselor will treat your report like the Boskalis Counselor independently and on a confidential basis. The Boskalis Counselor may be reached by e-mail at [boskalis counselor@boskalis.com](mailto:boskalis counselor@boskalis.com) and the female counselor may be reached by e-mail at [femalecounselor@boskalis.com](mailto:femalecounselor@boskalis.com).

You may make your report 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 investigate the reported (suspected) misconduct and to protect the person who made the report. The Boskalis Counselor and/or Boskalis shall not try to find out the identity of the person submitting such an anonymous report.

Please include in your report as many details as possible, such as the nature of the (suspected) misconduct, the persons involved, the time and place when and where it occurred, the discussions and actions which have already taken place regarding the (suspected) misconduct and all other information that might be relevant.

You may make your report in your own language. If necessary translation services shall be provided. This Speak Up Policy is available in English, Dutch and Spanish.

All personal data provided under this Speak Up Policy will be processed in accordance with applicable laws and the Boskalis Privacy Policy. This means, amongst other things, that personal data which is manifestly not relevant for the handling of a specific report shall not be collected or, if accidentally collected, shall be deleted without undue delay. By making a report, you consent to the use of any personal data provided (including your identity, unless you have made your report on an anonymous basis) for the Boskalis Counselor to investigate and for Boskalis, where necessary, to handle and remediate the reported (suspected) misconduct.

## **HOW YOUR REPORT IS TREATED**

The Boskalis Counselor shall acknowledge the receipt of the report by e-mail or in writing within seven days after it is being submitted.

Your report and your identity, as well as any third party mentioned in the report, will be handled in complete confidence and will only be disclosed to those who need to know for the purposes of any investigation. Both you, the Boskalis Counselor, and all persons related to the (suspected) misconduct will treat the report, the existence of a (potential) investigation and/or the outcome and recommendations as confidential. Without the permission of the Boskalis Counselor no

information will be provided to any third party within or outside Boskalis, unless so obliged by applicable law.

You may at all times in confidence consult an advisor concerning your report relating to the (suspected) misconduct. The Boskalis Counselor shall take your report immediately into consideration and gain information in relation to the report. Based on this information the Boskalis Counselor shall decide which actions are appropriate and necessary. If there is insufficient information for an investigation or if the report was made in bad faith, the Boskalis Counselor can decide to take no further action.

Every report is taken seriously. The Boskalis Counselor therefore always informs the Chairman of the Board of Management of RB of a report, unless the report concerns one of the members of the Board of Management. In that case the Boskalis Counselor will inform the Chairman of the Supervisory Board of RB. The Boskalis Counselor shall work in accordance with applicable laws and the Boskalis Code of Conduct. All persons involved shall be treated with fairness, respect, objectivity and impartiality. Persons are presumed innocent until proven otherwise.

The Boskalis Counselor will keep you informed of the developments with regard to the treatment of your report, unless this is not allowed under applicable laws or otherwise not appropriate.

The Boskalis Counselor shall, where possible, inform you within three months of acknowledgement of the receipt of the report on the outcome and any recommendations regarding your report. Where possible, you will be given the opportunity to respond to the outcome and recommendations.

The outcome and recommendations with respect to the report of (suspected) misconduct are also shared with the appropriate Chairman. Boskalis shall take with regard to the outcome and recommendations the necessary actions to remediate the substantiated misconduct. This may include disciplinary measures.

## **HOW WILL YOU BE PROTECTED**

Boskalis will protect persons who have spoken up in good faith and ensure that they shall not suffer any retaliation or detriment as a consequence of making a report. The fact that you have made a report in good faith in relation to (suspected) misconduct will not affect your employment or career possibilities at Boskalis. Boskalis will not accept any harassment or retaliation by other persons within Boskalis as a consequence of making a report and will take appropriate measures. This may include disciplinary measures.

It is always assumed that reports are made in good faith. Abuse of the Speak Up Policy will be taken seriously. A report that is deliberately not made in good faith may lead to disciplinary measures.

## **ACCOUNTABILITY AND GOVERNANCE**

Compliance with the Speak Up Policy is monitored by the Boskalis Counselor and the Compliance Officer and through audits performed by the internal auditor.

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

## WHERE CAN YOU FIND THE SPEAK UP POLICY

The Speak Up 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 SPEAK UP POLICY

You will receive a copy of the Speak Up Policy when you start working for Boskalis. As part of the introduction course a training will be given on the Speak Up Policy. If you have any questions with regard to the Speak Up 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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<b>Approved by</b>	Board of Management	Role: Board of Management
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