



# SOCIAL ACCOUNTABILITY POLICY

VISION AND EXPECTATIONS OF JAN DE NUL  
GROUP TOWARDS HUMAN AND LABOUR RIGHTS

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# 1 Introduction

The business activities of Jan De Nul Group have an impact on people and our planet. But Driven by our vision, mission and values, Jan De Nul Group is constantly contributing to a sustainable world. Through a well-considered and supported Corporate Social Responsibility (CSR) policy, we increase our positive impact on people, environment and society step-by-step. We pursue ambitions related to our social, environmental and economic impact.

Our social accountability policy sets out the standards that we pursue with regard to labour and human rights. In doing so, we respect all internationally recognised human rights and applicable standards and carry out our activities by consistently acting in accordance with the guidelines and systems set out below.

## **Link to external standards and guidelines:**

- ISO 45001
- ILO's Maritime Labour Convention (MLC)
- Sustainable Development Goals (SDG)
- Global Reporting Initiatives (GRI)
- Local legislation and regulations

## **Link to corporate policies and guidelines:**

- Code of Conduct Jan De Nul Group (JDN.GF.01.40)
- QHSSE Policy Statement Jan De Nul Group (JDN.QF.01.01)
- QHSSE rules for subcontractors (JDN.SF.04.05)
- CSR Policy Jan De Nul Group (JDN.GF.01.42)

We recognise that our business partners and, by extension, all our stakeholders play a crucial role in helping us to realise this ambition. This policy therefore also describes what we expect from our business partners in terms of labour and human rights.

We expect our business partners to make progress in their efforts to promote and respect labour and human rights. We expect our business partners to involve their own supply chain in this process.

Business partners must inform Jan De Nul Group immediately if they, or their suppliers/subcontractors, are not able to meet these expectations. Suppliers/subcontractors will allow Jan De Nul Group or an independent third party to conduct on-site audits or inspections, with or without prior notice, to verify compliance with the expectations described in this document. Failure to meet these expectations may lead to a change in the business relationship between Jan De Nul Group and the supplier/subcontractor.

## **2 Preventing child labour and protecting young workers**

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. Jan De Nul Group condemns all forms of child labour and takes appropriate measures upon any suspicion of child abuse, either in our own operations or those of suppliers or subcontractors. Such cases will be reported to the Project Management and the respective HR Department and an investigation will be initiated.

We expect our business partners to maintain the same high standards with respect to children and young people as stated above. Any other form of child labour must also be prohibited and appropriate action taken whenever there is evidence of any infringement.

## **3 Preventing modern slavery (forced labour and human trafficking)**

Jan De Nul Group only employs personnel based on a contract that is mutually agreed upon and does not make use of forced labour or slavery in any form. According to our internal procedures, every employee will comply with all legal requirements in performing their works. Our business partners will be selected on this basis before being included in the approved vendor list. All employees within Jan De Nul Group have the duty to report these malpractices, whether found in our own operations or those of our suppliers or subcontractors, to the Project Management and the respective HR Department in view of their further investigation. Jan De Nul Group guarantees that working conditions are in accordance with National/International Requirements.

We expect our business partners to take appropriate measures so that no employee has to work under mental, physical or financial coercion and to always enter into a mutually approved agreement with clear terms and conditions.

## **4 Providing a healthy and safe workplace**

To guarantee a healthy and safe work environment to all employees within Jan De Nul Group, a structured Health & Safety Management System has been established that has been certified by Lloyd's Register QA according to the ISO 45001 standard. Furthermore, all vessels of Jan De Nul Group are ISM and ISPS certified.

The overall aim of the H&S Management System is to maintain all occupational health and safety matters at the highest standard possible. The required actions to manage hazards and risks associated with our activities are identified and described, including the availability of sanitary facilities, drinking water, safety equipment and training resources.

All employees involved in the work 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.

We expect our business partners to employ their employees in a healthy and safe work environment so that they are optimally protected from accidents, injuries and illnesses. The accommodations provided must be safe, clean and suitable for living. For this purpose, equivalent standards must be applied and the necessary management tools must be in use.

## **5 Freedom of association and rights to collective bargaining**

Employees within Jan De Nul Group 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. All the necessary premises and equipment are made available to the consultative body, which meets on a regular basis.

We expect our stakeholders to respect trade union membership and activities without any discrimination. If on a local scale rights are limited, we expect our business partners to seek for alternative ways to promote an effective employee-employer relationship.

## **6 Ensure fair treatment and non-discrimination**

Jan De Nul Group adheres to the principles of the European Legislation concerning equal opportunities. Jan De Nul Group is committed to valuing and promoting diversity in all areas of recruitment, employment, training and promotion. Jan De Nul Group works towards an environment that is based on meritocracy and inclusiveness, where all employees can develop their full potential, irrespective of their race, gender, marital status, age, disability, religious belief, political opinion or sexual orientation.

We are convinced that managing diversity:

- Is essential to attract the most talented people,
- Is key to provide service excellence to all our customers,
- Is important to enhance opportunities to conduct a sustainable business,
- Has an important role in stimulating innovation and creativity.

Employees who are the victim of undesirable behaviour (e.g. harassment, sexual harassment, aggression, violence, discrimination) and employees facing workplace conflicts can contact a mediator, who will provide individual support. Within Jan De Nul Group, employees have been appointed who alongside their normal duties have the authority to provide confidential support to resolve such issues. An internal procedure stating how complaints are dealt with has been established.

We expect our stakeholders, at the very least, not to tolerate any form of undesirable and discriminatory behaviour. Possible grounds of discrimination include but are not limited to gender,

race, colour, religion, ethnic and social origin, nationality, sexual orientation, political opinion, health, disability or age.

## 7 Disciplinary practices

Upon their recruitment, new employees receive the guidelines of the internal rules and code of conduct, and attend safety inductions. Safety rules and responsibilities are clearly identified and explained.

Disciplinary actions are only taken in the event of repetitive violations of the internal rules and code of conduct. These include health or safety violations, shortcomings in the employee's work performances compared to his/her contract, the internal rules and the code of conduct, insofar as these shortcomings are not considered as a serious error. Offenders can be disciplined, through e.g. a reprimand, temporary suspension without payment, or transfer to another department or division.

Offenders can lodge an appeal against such decisions with the corresponding HR Department, directly or through their labour representatives.

Certain facts are considered a serious error, which may justify an immediate breach of the employee's contract, without prior notice or compensation. Serious errors could be, for instance, intoxication on the project site or on board of a vessel, using or dealing drugs, violence and physical aggression towards colleagues and others, etc.

Under no circumstances, corporal punishment, mental or physical coercion and verbal abuse of workers is tolerated. Disciplinary measures are fairly administered and documented by the respective HR Department.

We expect our stakeholders to deal with breaches or violations of internal guidelines in an acceptable manner. The employees must, at the start of their employment, be informed about all expectations, possible sanctions and the procedure to appeal against decisions.

## 8 Providing fair wages and reasonable working hours

The cooperation between the existing social partners has resulted in a dynamic, flexible and protected workforce. Jan De Nul Group only applies legally allowed working time schedules in line with the requirements of their respective companies. The main consideration is that work schedules, facilities and processes are designed so as to allow personnel the opportunity to get sufficient rest and relaxation to be able to perform their duties in a safe manner. This also leads to clear-headedness in a healthy body.

This can be deviated from in certain circumstances, for instance when experiencing difficulties and in case of very specific operational requirements. In this context, our dredging/offshore works require extended working hours and a continuous work schedule. However, the generally applicable minimum hours of rest for crew members on board meet the guidelines limits of ILO's Maritime Labour



Convention of 2006 and also our operational procedures and workplace arrangements are based on this schedule.

Jan De Nul Group establishes specially adapted and well-balanced leave schedules for its expatriate employees in accordance with international industry practices. It allows expatriates to maintain a good work/private life balance, in harmony with their families and social life.

We expect our stakeholders to refrain from excessive working hours as this would affect the balance between work and private life and, as such, endanger the health and safety of the employee concerned. When determining the working hours, the applicable laws or guidelines must be applied. Workers should be able to refuse excessive working hours without any risk of discrimination.

Jan De Nul Group offers a competitive salary package to all its employees, tailored to the industry's payment standards, and complemented with fringe benefits, such as additional health insurance, in line with the living standards in the employees' home country.

Regional minimum salaries and international salary standards are respected at all times.

The key issues of our remuneration policy are:

- Identification and compliance with local / national minimum requirements as established by law;
- The national / regional minimum wage is respected as a minimum;
- Legally required social benefits such as medical care, accident insurance;
- Wages paid must at least meet the legal minimum requirements and Jan De Nul Group ensures that they also meet the basic needs of its employees;
- Wages are paid in a timely manner and our employees receive a detailed pay slip, including wage calculation details.

We expect our business partners to remunerate their employees according to the minimum legal standards as well as the conditions laid down in binding collective bargaining agreements or internationally recognised human rights standards. These remunerations must be proportional to a sufficient standard of living.

## 9 Respecting local communities

The success of Jan De Nul Group as a company depends on delivering positive outcomes to our stakeholders, including the communities that host our operations. "We aim to build lasting relationships with community members by involving them in our projects from a very early stage whenever possible. Wherever our operations neighbour with local communities, we seek to partner and engage with them to diminish the negative aspects of our operations and maximise the social and economic benefits that we can bring. We want to ensure that our projects will result in an additional asset to the neighbourhood that everyone can be proud of."

We expect our business partners to respect human rights within the communities in which they work. In addition, we want to encourage them to reduce negative impacts wherever possible.

## 10 Management System

The respective Human Resources Managers are our representatives who ensure that all legal requirements concerning labour and working conditions are met.

Jan De Nul Group has already established a framework to ensure compliance with and the continuous improvement of the Quality, Health, Safety, Security and Environmental Management System, which is reviewed once a year. A QHSSE Policy Statement, signed by the director of Jan De Nul Group, warrants that our efforts meet all applicable legal requirements and regulations and confirms Jan De Nul Group's commitment towards continuous improvement in view of ensuring sustainable operations. Furthermore, a separate Code of Conduct has been endorsed by the director of Jan De Nul Group, outlining the commitment of the Group to strive for ethical sourcing of goods and services. This Code is being integrated into our quality assurance processes such as the management of nonconformities and document control procedures.

Although the development of the Social Accountability Management System within Jan De Nul Group is still in progress, an integrated management system is an important trend, which will require further investment in involvement and training.

## 11 Complaints and confidential mediators

Jan de Nul Group encourages everyone to report labour and human rights violations. This can be done by contacting the project management or the confidential mediator of Jan De Nul Group.

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