



MODERN SLAVERY STATEMENT

2023
REPORT



Document control

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Reference documents

| Reference | Title |
|---------------------------------|--------------------------------|
| JDN controlled documents | |
| JDN-POL-0004 | Sustainability Policy |
| JDN-POL-0003 | Code of Conduct |
| JDN-POL-0006 | Supplier Code of Conduct |
| JDN-POL-0005 | Social Accountability Policy |
| JDN-POL-0002 | QHSE Policy Statement |
| JDN.GF.01.45 | Sustainable Procurement Policy |



Definitions

| Definition | Meaning in this Statement |
|-----------------------------|---|
| Modern slavery | Modern Slavery is a term used to encapsulate child labour, slavery, servitude and forced or compulsory labour; and human trafficking. |
| Slavery and servitude | Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal ‘ownership’ of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom. Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a ‘serf’ to live on another person’s property and the impossibility of changing his or her condition. |
| Forced or compulsory labour | Forced or compulsory labour is defined in international law by the ILO’s Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily. |
| Human trafficking | An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation. |
| Child labour | The term “child labour” is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Whether or not particular forms of “work” can be called “child labour” depends on the child’s age, the type and hours of work performed, the conditions under which it is performed and the objectives pursued by individual countries. |



Purpose

This Modern Slavery Statement (hereinafter referred to as this “**Statement**”) describes the steps Jan De Nul Group has taken, in a range of areas, to deal with modern slavery risks in its value chain and own operations in conformity with the UK Modern Slavery Act, covering the following period:

1 January 2023 to 31 December 2023

This Statement replaces any previous Anti-Slavery and Human Trafficking Statements.

This Statement is made on behalf of Jan De Nul Group including all of its subsidiaries, and specifically Jan De Nul UK Ltd, Jan De Nul Luxembourg SA and Jan De Nul NV.

This document is proprietary to Jan De Nul Group. The information contained herein is subject to change and uncontrolled copying or distribution. We do not guarantee its accuracy or completeness. It is important to verify whether updates or revisions have been made since the creation of this document. Any reliance you place on the information in this document is strictly at your own risk.

1 Our commitment

In line with our vision, mission and values, taking into account the interests of our stakeholders, we commit to respecting all internationally recognised human rights and applicable standards. We strive to prevent, cease and mitigate adverse impacts on human rights within our business operations around the world. We expect our business partners to do the same.

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 value chain.

The concrete steps to tackle modern slavery are outlined in this statement.

2 Our business, organisational structure and value chain

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 (Luxemburg). We have over 7000 employees and non-employee workers. We operate all over the world. We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors.

Jan De Nul Group operates in the following sectors:

- Dredging works
- Offshore works
- Civil construction works
- Environmental works

3 Due diligence processes

Jan De Nul Group conducts due diligence on its own operations and value chain.

This due diligence is a process that is implemented in relation to various sustainability topics, which includes steps in relation to slavery and human trafficking in its business and value chain.

In the course of 2023 Jan De Nul Group started to incorporate this due diligence in a companywide Due Diligence Procedure. Jan De Nul Group's intention is to have this Due Diligence Procedure finalized in 2024.

Due to the specific conditions that are inherently linked to complex civil works, challenging maritime and environmental projects, and ground-breaking realisations in the offshore and renewable energy

industry all over the world, Jan De Nul Group is creating its Due Diligence Framework for conducting due diligence during its activities. This is not only to respond to the UK Modern Slavery Act, but also to evolving regulatory and stakeholder requirements and expectations.

The commitment of Jan De Nul Group is to conduct its projects whilst preventing and mitigating adverse impact in its own operations and its value chain. The goal of this framework is to avoid that the company operations and value chain of Jan De Nul Group contribute to human rights issues, modern slavery, unethical business practices or harm people, the environment or society.

Jan De Nul Group's Due Diligence Procedure follows the six building blocks of the OECD Due Diligence Framework and provides a backbone for meeting local and global due diligence obligations:

1. **Policy and management system:** our due diligence procedure is being embedded in a policy communicated internally and externally and will be part of our company wide corporate management system.
2. **Risk assessment:** our abstract and concrete risk assessment allows us to identify and assess adverse impacts on the basis of internal and external data sources.
3. **Prevention, mitigation and remediation measures:** we prioritise and select relevant prevention and mitigation measures on the basis of our impact and leverage.
4. **Grievance mechanism:** we establish and communicate grievance mechanisms when and where relevant in the value chain. Our grievance mechanism is embedded in our risk assessment and prevention and mitigation measure procedure;
5. **Monitoring and effectiveness evaluation:** we monitor on an ad-hoc basis the effectiveness of actions taken by means of appropriate qualitative and quantitative indicators and include feedback received from both internal and external stakeholders, including affected stakeholders.
6. **Documentation and reporting:** every step in our value chain due diligence process is documented and reported to both internal and external stakeholders. Our documentation procedure is built to fulfil the audit requirements of the Corporate Sustainability Reporting Directive (CSRD).

3.1 Policy and management system in relation to modern slavery and child labour

Jan De Nul Group will not tolerate any form of modern slavery, such as human trafficking, forced labour or slavery, neither within its own organisation nor in its value chain.

Similarly, Jan De Nul Group will not tolerate child labour and will also take appropriate measures in case child abuse is suspected with one of our suppliers, subcontractors, partners or any other third party we do business with.

Jan De Nul Group has developed a number of policies to ensure that we are conducting business in an ethical manner and with integrity in all our business relationships, such as the policies mentioned in the reference documents on page 1.

3.2 Risk Assessment

Relevant stakeholders and suppliers and subcontractors are assessed against abstract risk positions (country level and industry). To determine whether a location or business activity is identified as high-risk, countries and industries are screened in an abstract risk assessment against various criteria.

Depending on the outcome of the abstract risk assessment, additional due diligence steps are required. Such steps may include:

- Additional detailed assessment;
- Sending out of the supplier assessment questionnaire;
- Request for further mapping of the value chain;
- Site visit and audit.

In 2023, 32.4% of the suppliers of Jan De Nul filled in the supplier sustainability assessments.

3.3 Prevention, mitigation and remediation measures

3.3.1 Prevention and mitigation measures towards suppliers

Prevention and mitigation measures are taken towards 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

An e-learning module for selected suppliers in our value chain is included in our medium term due diligence plan.

3.3.2 Prevention and mitigation measures towards own workforce - training

Prevention and mitigation measures are taken towards own workforce. This includes training.

In 2023 Jan De Nul Group key personnel were trained on modern slavery, with the following objectives:

- Recognize the warning signs of modern slavery.
- Identify the risk of modern slavery within our industry and regions we work in.
- Ask questions of suppliers and third-party agencies to help identify risks.
- Recognize drivers that may encourage modern slavery.
- Know where to report concerns of unethical or illegal behaviour.
- Make a commitment to preventing global modern slavery in our business.

In 2024 this training will be embedded in the overarching due diligence training framework.

Furthermore, we are committed to ensuring that all employees follow the e-learning module of the Code of Conduct:

- In 2023, we focused on classroom training to raise awareness among workers and crew members.
- In 2024, we will switch to a new e-learning module adapted to the renewed Code of Conduct. We are moving towards mandatory refresher training to raise awareness about ethical conduct.

Also, awareness has increased with the Jan De Nul Group purchasing team, especially since the onboarding of our Sustainability Procurement Officer at the beginning of 2024.

3.3.3 Grievance mechanisms

Jan de Nul Group encourages everyone to report labour and human rights violations. This can be done by contacting the project management or, for own workforce, the confidential mediator of Jan De Nul Group. 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 actions against an employee for filing a complaint.

Also, in 2023 we adopted a Policy for the Protection of Whistleblowers.

3.3.4 Trade unions or other worker representative groups

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. The Social Accountability Policy and Human Rights Policies drafts describe the vision and expectations of Jan De Nul towards Human and Labour rights, among which 'Freedom of association and rights to collective bargaining'.

3.4 Monitoring and effectiveness evaluation

3.4.1 Engaging with others

We engage with various stakeholders to help monitor working conditions across our operations and value chain:

- For years we have had a multi-disciplinary company wide team "Stakeholder Engagement" that plans and implements regular engagement with different stakeholder groups;
- In 2023 the following stakeholder groups were identified:
 - Nature;
 - Private clients;
 - Public clients;
 - Suppliers (including subcontractors and service providers);
 - Suppliers' workers;
 - Affected communities;
 - Peers;
 - Banks;



- Insurance companies;
- Jan De Nul Group workers;
- Jan De Nul Group supervisory bodies.
- In 2023 we started the development of a supplier engagement plan which we started to roll out in 2024;
- In 2024 our stakeholder sustainability questionnaire was launched.
- As part of the Due Diligence Procedures we will further develop tracking and measurement of the progress through engagement with the suppliers, consultation of, and engagement with the other relevant stakeholders as well as other indicators. More specifically, it entails three activities:
 - Initial risk level and target risk level;
 - Efficiency test planning;
 - Residual risk level.

3.4.2 Social audits

Jan De Nul Group's working practices from the point of view of social responsibility are being part of occasional internal audits by our staff.

Any other (third party) audits will be further discussed within the course of the implementation of the new Due Diligence Procedure.

3.5 Reporting

Jan De Nul Group aims at communicating a plan on how all aspects of its Due Diligence Procedure are embedded in the business. It will do so internally and externally to all personnel, business partners and other relevant parties