

# SUSTAINABILITY POLICY



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JDN | POL | 0004 | en | 01.01  
Sustainability



# Document control

## Document information

<b>Company name</b>	Jan De Nul - JDN		
<b>Document template</b>	Policy		
<b>Document number</b>	0004		
<b>Language</b>	English - en		
<b>Document revision</b>	01.01	<b>Complete revision</b>	<input type="checkbox"/>
<b>Document title</b>	Sustainability Policy		
<b>Initiating department</b>	Sustainability - SUST		
<b>Field of application</b>	JDN Group		

## Revision history

Revision	Date	Description and location of changes
01.01	27-Jun-2024	Added table responsible, content reviewer and approver Correction w.r.t. document number document revision number
01.00	03-Jun-2024	Complete revision
00	05-Oct-2020	

## Review and approval

Responsible	Content reviewer	Approver
RHA	RHA	SDL

Endorsed for application within Jan De Nul Group by	Date
Director: Niels Van Ghendt	04-Jun-2024
Director: Johan Van Boxstael	04-Jun-2024

## Reference documents

Reference	Title
<b>JDN controlled documents</b>	
JDN-POL-0002	QHSE policy statement
JDN-POL-0003	Code of conduct
JDN-POL-0005	Social Accountability policy
<b>Standards</b>	
CSRD 2022/2464	Corporate Sustainability Reporting Directive

Reference	Title
SDG	United Nation's Sustainable Development Goals
CO2PL	CO <sub>2</sub> Performance Ladder

## Definitions

Definition	Meaning
Employee	Any reference in the below text to 'an employee' also applies to associates, management and directors.
Jan De Nul Group	Jan De Nul Group means Sofidra SA and all of its affiliated companies.
Policy	A policy is a general commitment, direction, or intention and is formally stated by top management.

## Abbreviations

Abbreviation	Meaning
ESG	Environment, Social, Governance
ILO	International Labour Organization's
JDN	Jan De Nul Group
MARED	Marine Environmental Department
OECD	Organisation for Economic Co-operation and Development
QHSSE	Quality, Health, Safety, Security & Environment

# Purpose

The purpose of this Sustainability policy is to summarise the Sustainability strategy and commitments of Jan De Nul Group to manage Sustainability matters.

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# 1 Scope

## 1.1 Implementation scope

<b>Policy to be implemented by</b>		<b>Geographical boundary</b>
Companies of Jan De Nul Group	Yes, by all companies of Jan De Nul Group	Worldwide
Supply chain of Jan De Nul Group	Yes	
Clients of Jan De Nul Group	Advised	

In case there is a difference between the Jan De Nul Group's Sustainability Policy and local laws or policies, the stricter rules prevail.

## 1.2 Information scope

This policy may be communicated to any third party without any restrictions, for informative purposes.

## 2 Sustainability Strategy

Our Sustainability Strategy focuses on impacts, risks and opportunities in the following 3 ESG axes:

- **ENVIRONMENT**

We are committed to preventing damage to the environment and protecting biodiversity. We aim to prevent pollution, drastically reduce our negative impact on the climate and contribute to the circular economy.

- **SOCIAL**

We provide a safe and secure environment for all persons working with or for us or on our behalf. We implement all necessary measures to prevent work-related injuries and ill health. We care for human rights. We invest strongly in learning and development and respect the communities around us.

- **GOVERNANCE**

We embed the above in our governance and strategy, allowing us to pursue continual improvement and sustainable growth.

Within the three ESG pillars, we defined eleven core topics within which we work towards effective, data-driven progress to achieve our strategic objectives.

For all core topics, we defined measurable objectives that - through our sustainability policy - are an integrated part of all our activities and the whole of our value chain.

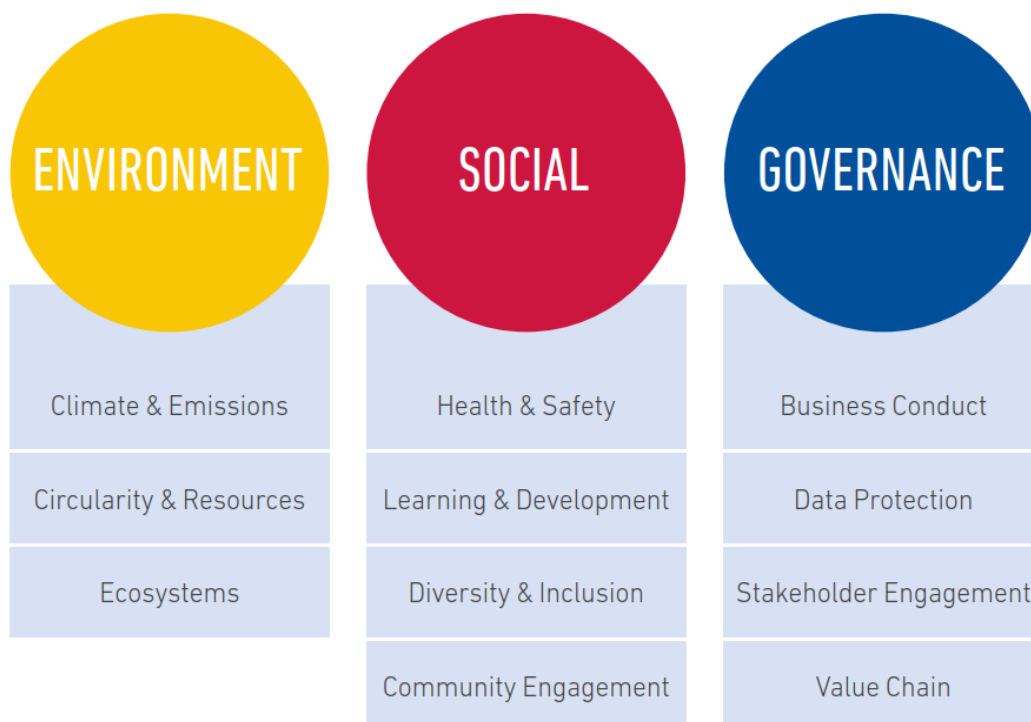


Figure 1 Sustainability topics within the ESG pillars

## 3 Environment – 'We are constantly reducing our ecological footprint'

As a company, we are committed to preventing damage to the environment and protecting biodiversity. We aim to prevent pollution, drastically reduce our impact on the climate and contribute to the circular economy.

Together with our partners, clients, suppliers, and subcontractors, we look for tangible initiatives and solutions to execute our projects in a sustainable manner. We want to limit our negative ecological footprint and even improve the biodiversity in the ecosystems surrounding us.

Furthermore, we strive to more strategic objectives on the following 3 Environmental Sustainability Topics to reduce our ecological footprint, manage our environmental risks and value our opportunities.

### 3.1 Climate & Emissions

We are committed to climate change mitigation by reducing our greenhouse gas emissions via science-based targets and to reduce harmful emissions by taking reduction measures for pollutants. We actively reduce the use of fossil fuels, use sustainable alternatives where possible and reduce our energy consumption by optimising our energy efficiency.

Additionally, we contribute to climate adaptation works for the climate change already happening, as well as to the energy transition through our renewable energy installation projects.

### 3.2 Circularity & Resources

We opt for sustainable consumption and production by implementing circularity in our activities. Our aim is to increase the share of non-virgin inflow of our key resources. We want to do this by procuring more re-used, recycled or from renewable origin materials and products.

On the other hand, we aim to increase circular resource outflow. This means that we are continuously improving our selective processing of waste. We give priority to waste prevention, followed by reuse, recycling, recovery and finally disposal.

### 3.3 Ecosystems

Our activities have an impact on the wider environment, including the local biodiversity. Integration management of biodiversity into our business activities is crucial. Therefore, we are improving our environmental performances step by step out of respect for nature. Both during the development and execution of our projects, we use in-house expertise to protect or enhance ecosystems and to use natural resources in a sustainable manner.

Amongst others, we manage our material impacts on biodiversity-sensitive areas, on land- and sea-use change, on the state of species and ecosystems, and on water and marine resources (e.g. sand).

Wherever possible, we suggest nature-based solutions for the projects envisaged by our clients.

## 4 Social - 'We strive for a supportive and inclusive work environment'

We invest in people to strengthen organisational capability and develop a committed, talented and environmentally aware workforce that delivers high-quality results through operational control. The participation and consultation of our employees and their representatives is vital to achieve our goals. Jan De Nul Group guarantees that working conditions for its staff and crew are in accordance with national and international requirements. We value an inclusive and diverse workforce very highly and we support our employees to embrace a healthy lifestyle, both physically and mentally.

In addition, we want to take our responsibility to promote the highest labour and human rights standards throughout our own operations, our value chain and in the communities we might affect. We respect and support the human rights as set out in the international principles and standards including the United Nations Universal Declaration of Human Rights, the International Labour Organization's (ILO) Declaration on Fundamental Rights and Principles at Work, the UN Guiding Principles on Business and Human Rights (UNGPs) as well as the OECD Guidelines for Multinational Enterprises and, at a minimum, the laws of the countries in which we operate.

Jan De Nul Group has defined 4 Social Sustainability Topics to create this supportive work environment:

### 4.1 Health & Safety

Jan De Nul Group makes every effort to ensure all employees and workers in its value chain can perform their tasks in a safe and secure environment. We will not accept any of our employees, subcontractors or people working on our behalf to take unnecessary risks and we expect our employees to stop any task which cannot be performed safely.

Our objectives, goals and principles related to health, safety, security and preservation of the environment are summarized in the Jan De Nul Group QHSSE Policy Statement.

### 4.2 Diversity & Inclusion

Jan De Nul is a company that reflects the world around us and creates a work environment where all employees can thrive and be themselves. We encourage diversity in all areas: recruitment, employment, training, promotion and so on. We do not tolerate any form of discrimination. We believe that diversity offers creative and innovative solutions to challenges and benefits both the company and our employees.

Undesirable behaviour is not acceptable. We have policies to prevent these situations, and employees can contact a confidential counsellor who is trained to intervene in these cases.

The inclusive behaviour we expect from our employees and business partners is further elaborated in our Code of Conduct and in our Supplier Code of Conduct.

## 4.3 Learning & development

At Jan De Nul Group, the skills of our people are essential to our business. Making learning obvious for everyone is one of our cornerstones. Through relevant training courses, we ensure that all employees can continuously expand their skills and knowledge. In doing so, we ensure both their personal development and the growth of our company. Today, our platform My Learning is the place to be for subscribing to and following training courses.

## 4.4 Community Engagement

Because of the nature of the services we provide, we often encounter local communities. All our employees have the utmost respect for these local communities. We respect their ways and customs and keep an inclusive, diverse and open mind set.

We identify local stakeholders in order to inform them in operations that might affect them. Additionally, we identify negative and positive impacts on affected communities, as well as material risks and opportunities related to affected communities.

We involve the local community in the works to set up a sustainable collaboration to contribute to the local economy by recruiting and buying locally.

# 5 Governance – “We stand for sustainable business operations”

Good governance is the basis of any healthy and sustainable company. After all, achieving social and environmental objectives is only possible if an effective management organisation, sufficient internal controls and policy documents on ethical business practices are in place, data security is a priority, and stakeholders are regularly and transparently involved in management decisions. Besides, this does not only apply to Jan De Nul Group’s own activities, but to our entire value chain. We want to make the right choices for everyone coming into contact with our group.

Jan De Nul Group has defined 4 Governance Sustainability Topics to ensure sustainable business operations.

## 5.1 Business conduct

As a global player within a large network of stakeholders, Jan De Nul Group has a responsibility to contribute to ethical business practices and to set an example in doing so. We uphold the law in every country we work in and conduct business in an open and honest manner within a framework of mutual respect.





Employees of Jan De Nul Group and everyone working for or on behalf of Jan De Nul Group are expected to deal ethically and fairly with all business partners and stakeholders, that means not allowing any form of corruption, bribery, fraud, abuse, slavery, child or forced labour, human trafficking or other infringement of our Code of conduct or in our Supplier Code of Conduct.

## 5.2 Data protection & cyber security

Digital work and connectivity have become part of our daily activities. Our sustainability policy is focused on protection our information assets, warding off cybercrime and establishing an energy-efficient architecture.

Jan De Nul Group has information security policies, standards and procedures in place that allow protection and management of Jan De Nul Group's information as well as that of its stakeholders and promote trainings on this.

## 5.3 Stakeholder Engagement

We strive to be the partner of choice for clients and partners. We collaborate with our suppliers, subcontractors and other stakeholders. Partnerships and joint commitments with stakeholders result in more effective sustainability targets and actions, innovation, improved risk management and an increased sphere of influence.

## 5.4 Value Chain

As a contractor, Jan De Nul Group works with a great many suppliers and subcontractors. We have an extensive and diverse value chain spread all over the world. We promote sustainability throughout the project process and strive to continuously improve our impact. As a global player, we recognise our responsibility to protect and promote labour and human rights throughout our value chain. We do this via a thorough Due Diligence of our value chain.

We expect our clients, suppliers and subcontractors to operate in line with our Sustainability Policy and with the topical policies and to work together with us towards our shared goals.

## 6 Embedment in the organisation and in the value chain

### 6.1 Embedment in the organisation of Jan De Nul Group

The eleven Sustainability topics are managed in our organisation through various bodies as per below diagram.

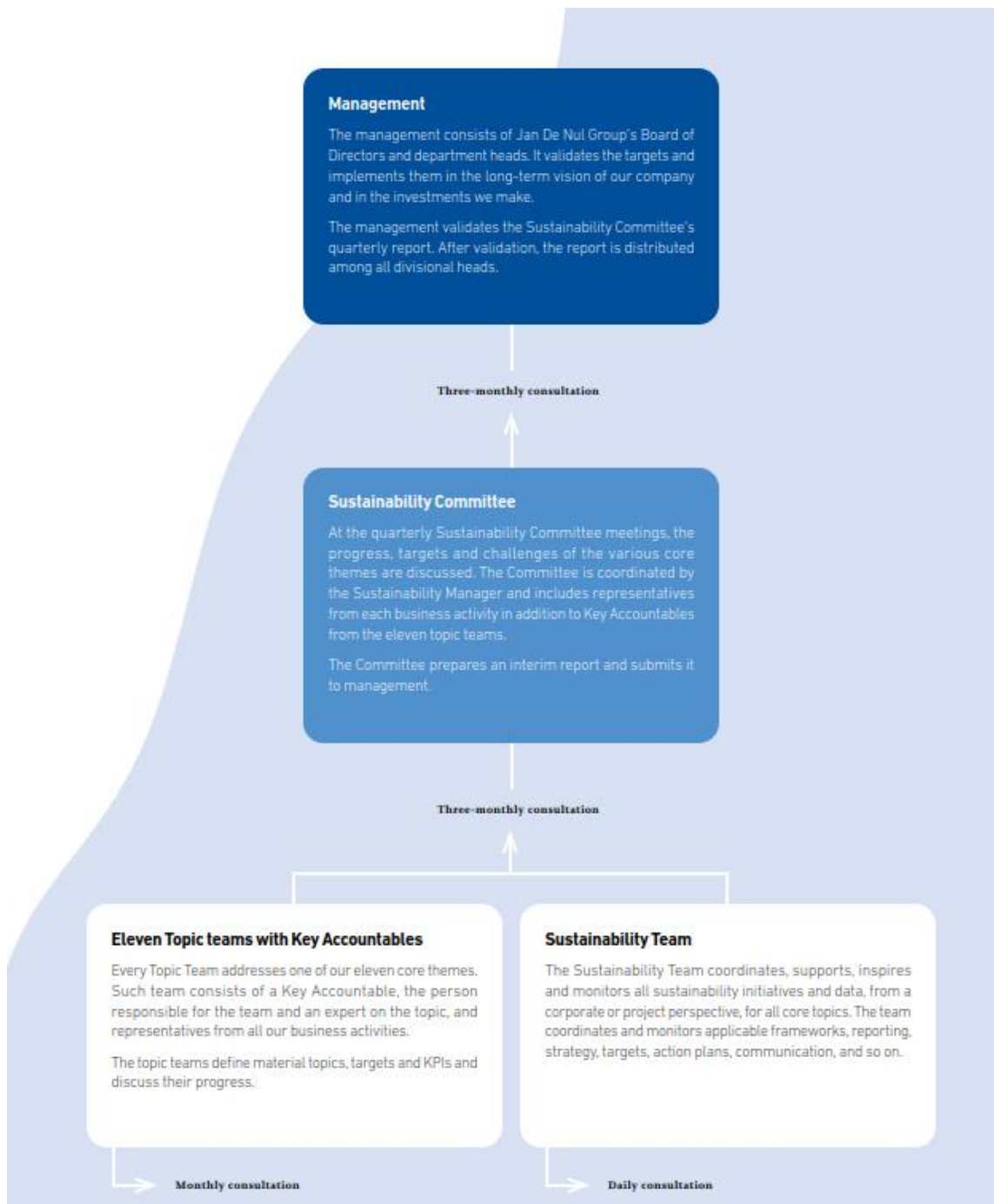


Figure 2 embedment of Sustainability in the organisation of Jan De Nul Group

## 6.2 Topical policies

To pursue our ambitions, we execute a thorough **Sustainability Due Diligence** in own operations and in the value chain in line with the applicable standards and frameworks. This leads to more detailed topical policies that include KPI's and targets per Sustainability Topic, concrete actions, measurement of our efforts, data-driven progress and a qualitative reporting.

# 7 United Nation's Sustainable Development Goals

Our sustainability strategy is guided by the United Nation's Sustainable Development Goals. The figure below summarizes which Sustainable Development Goals are progressed by the 11 Sustainability Topics of Jan De Nul Group.



Figure 3 Sustainable Development Goals linked to JDN Sustainability topics

## 8 Implementation of the Sustainability policy

### Implementation by Jan De Nul Group

<b>This policy is communicated via:</b>	JDN Connect and JDN website. To be communicated both internally and externally.
<b>This policy is implemented by means of:</b>	Communication / publication Training (e.g. e-learning) Defining strategic KPIs and objectives Corporate management system
<b>Responsibility of implementation of this policy is with:</b>	Management and Sustainability Team
<b>This policy is aligned with:</b>	CO <sub>2</sub> Performance Ladder CSRD 2022/2464
<b>This policy will be evaluated, reviewed and updated:</b>	This Sustainability Policy will be revised by the management of Jan De Nul Group and updated on a regular basis in order to ensure that it reflects relevance, stakeholder input, changing circumstances, changing legislation, amended certifications, new knowledge and opportunities for Jan De Nul Group.

### Implementation by value chain

<b>This policy is communicated via:</b>	JDN website, contracts and purchasing conditions
<b>This policy is implemented by means of:</b>	Communication / publication Training (e.g. e-learning) Defining strategic KPIs and objectives
<b>Responsibility of implementation of this policy is with:</b>	Management and Sustainability Team Supplier line management
<b>This policy is aligned with:</b>	CO <sub>2</sub> Performance Ladder CSRD 2022/2464
<b>This policy is communicated to:</b>	All counterparties of Jan De Nul Group