

## **DONATION AND SPONSORSHIP POLICY**

### **1. INTRODUCTION**

Our Code of Conduct (known as the “BenWiser”) describes our core values and rules of behaviour. Acting with integrity is an important part thereof. Ballast Nedam expects from everyone working for the company to behave in accordance with the Code of Conduct.

The Ballast Nedam Donation and Sponsorship Policy (“Donation and Sponsorship Policy”) is a subcode of our Code of Conduct and describes under which conditions donations and sponsorships can be provided. Ballast Nedam provides for donations/sponsorships to socially responsible causes with the aim to make positive and sustainable contributions to the environment and society.

### **2. SUPERVISION AND RESPONSIBILITY**

The Donation and Sponsorship Policy is applicable for Ballast Nedam N.V. and all of its subsidiaries. All Donations/Sponsorships should be reviewed by the Chief Compliance Officer (“CCO”) and approved by the responsible C-level and/or the Board of Management in accordance with the instructions mentioned in paragraph 5 (request procedure) of this Donation and Sponsorship Policy.

### **3. CRITERIA FOR SUITABILITY & DUE DILLIGENCE**

**3.1** Donations and sponsorships need to comply with the applicable laws and regulations, including anti-corruption legislation. Every donation or sponsorship needs to be assessed if it complies with:

- Laws and regulations, including anti-corruption laws of the country where the beneficiary and the Ballast Nedam entity is registered and/or works;
- The internal policy of the beneficiary, if any, which governs the acceptance of donations/sponsorships.

**3.2** Before granting any donation/sponsorship, a KYC (Know Your Customer) check needs to be performed to confirm that the beneficiary is not listed on a sanction list (UN, EU, OFAC).

### **4. EXCLUDED FROM SPONSORSHIPS/DONATIONS**

The persons and organisations mentioned below can, under no circumstances, be beneficiaries of donations or sponsorships:

- Public officials and/or public authorities or to an entity/person with a public function.
- Any person or entity listed on a sanction list (UN, EU, OFAC).
- Political parties and any form of political engaged events or organizations.
- Charities linked (directly or indirectly) to a Politically Exposed Person (PEP).

Donations and sponsorships are not to be made in cash.

## 5. REQUEST PROCEDURE

A donation/sponsorship request needs to be submitted by using the “Ballast Nedam Donation/Sponsorship Policy - Request Form”, which will be reviewed by the CCO and approved by the responsible C-level and/or the Board of Management of Ballast Nedam (a Board member A and Board member B acting together can sign on behalf of the Board of Management).

For every donation/sponsorship the following information needs to be recorded and archived. By using the “Ballast Nedam Donation/Sponsorship Policy - Request Form”, the following information will be collected:

- I. The beneficiary and purpose and amount of the donation/sponsorship;
- II. If there is any link with public officials and PEPs;
- III. If the donation/sponsorship is in accordance with the applicable laws and regulations (including anti-corruption laws and EU, UN, OFAC sanction lists);
- IV. Monitoring of the donation/sponsorship( is it used for the intended purpose?).

The “Ballast Nedam Donation/Sponsorship Policy - Request Form” needs to be:

- Completed by the responsible employee of the entity who wants to provide for the donation/sponsorship and signed by the Business Unit Director; and
- If the amount is < €10.000, reviewed by the CCO and approved by the responsible C-level.
- If the amount is > €10.000, reviewed by the CCO and approved by the by the responsible C-level and the Board of Management.

## 6. TRANSPARANCY AND ACCOUNTABILITY

Donations/sponsorships should be transparent. This should be guaranteed by accurate and complete records of the donations/sponsorships in the administration of Ballast Nedam, in accordance with the relevant with laws and regulations. It should be verified if the donated/sponsored amount is used for its intended purpose. For each donation/sponsorship it should be determined whether a right to audit by (or on behalf of) Ballast Nedam should be agreed upon by Ballast Nedam and the beneficiary of the donation/sponsorship.

## 7. CONSEQUENCES OF NON-COMPLIANCE AND MISUSE

In case of non-compliance with the “Donation and Sponsorship Policy” and or misuse of the donation/sponsorship, the Compliance Department of Ballast Nedam has the right to conduct an investigation of which the findings can lead to disciplinary measures for the involved persons.

## 8. QUESTIONS?

In case of questions you can contact:

Manager Communication and Marketing  
[communicatie@Ballast-nedam.nl](mailto:communicatie@Ballast-nedam.nl)

Chief Compliance Officer  
[compliance@ballast-nedam.nl](mailto:compliance@ballast-nedam.nl)

Approved by the Board of Management on 18 April 2019