

Human Rights Policy

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Ballast Nedam

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1. Purpose and scope

The purpose of Ballast Nedam's Human Rights Policy ("Policy") is to set out the key principles of Ballast Nedam N.V. that apply to the employees of Ballast Nedam, together with its group companies ("Ballast Nedam" or "Group") and third parties regarding human rights.

Ballast Nedam and parties acting on its behalf are required to act in accordance with this policy, and other third parties with whom Ballast Nedam collaborates (customers, suppliers, business partners, etc.) are expected to comply with these provisions. Ballast Nedam makes reasonable efforts to manage and monitor the performance of external employers.

The Board of Directors of Ballast Nedam N.V. is responsible for the monitoring; the Human Resources department is responsible for the implementation of this policy and all employees of Ballast Nedam are required to adhere.

The meanings assigned to certain terms in this policy are explained below:

- **Forced or compulsory labour:** all work or services performed by a person under the threat of force or punishment and not performed voluntarily.
- **Harassment:** Any form of verbal, written, physical and visual behaviour that disturbs the other party by degrading, attacking and/or insulting the person's language, race, skin colour, gender, political opinion, union membership, belief, age, physical disability, sexual orientation, military status or purely personal characteristics.
- **Human Rights:** Rights that are inherent to all individuals, regardless of language, race, skin colour, gender, political opinion, union membership, religion, age, physical disability, sexual orientation, military status, or any other status. Human rights include, but are not limited to, the right to life and liberty, freedom from slavery and torture, freedom of thought and expression, and the right to work and education. Everyone is entitled to these rights without discrimination.
- **Retaliation:** Any negative situation individuals may face as a result of a report they have made.

- **Ballast Nedam or Group:** Ballast Nedam N.V. together with its affiliated companies and/or subsidiaries that are directly or indirectly controlled by Ballast Nedam N.V.
- **Vulnerable group:** Groups that are at a higher risk of discriminatory practices, violence, natural and environmental disasters, or economic adversity than other groups.
- **Third parties:** Individuals or companies with whom Ballast Nedam engages in commercial activities, including but not limited to suppliers, customers, contractors and business partners.
- **United Nations Global Compact:** The treaty that encompasses the fundamental responsibilities of business in the area of human rights, labour standards, environment and anti-corruption, based on the United Nations declarations. Ballast Nedam has been a party to the United Nations Global Compact through its parent company Rönnesans Holding since September 2015.
- **Women's Empowerment Principles:** The set of principles that guide business in promoting gender equality and women's empowerment in the workplace, marketplace, and community through the Women's Empowerment Principles (WEPs) platform, established in collaboration with the United Nations Global Compact and the United Nations Entity for Gender Equality and the Empowerment of Women (UN Women).

2. General principles

Ballast Nedam recognizes the universally accepted principles that centralize the concepts of human rights and labour standards. Ballast Nedam adopts the principles and rules of the WEP's platform and acknowledges that these responsibilities are inevitable for its long-term success.

In addition to the above, Ballast Nedam operates in accordance with the following international standards and principles regarding human rights:

- United Nations Guiding Principles on Business and Human Rights
- IFC Performance Standard 2: Labour and Working Conditions
- ILO (International Labour Organisation) Declaration of Fundamental Principles and Rights at Work
- Universal Declaration of Human Rights
- OECD Guidelines for Multinational Enterprises

Ballast Nedam takes into account the risks of human rights violations to which its own staff and those in the supply chain may be exposed and takes the necessary care to prevent such risks. In the event that risks arise from commercial activities for these individuals, Ballast Nedam commits to making improvements by generating a reasonable solution as soon as possible.

3. Responsibilities

3.1. Zero tolerance against discrimination

Ballast Nedam promotes a creative, culturally diverse and collaborative work environment where the rights of all employees are always respected. Creating a fair and respectful work environment for Ballast Nedam employees is an integral part of the Group's understanding of human rights. All human resources policies and practices related to recruitment, career planning, promotion, rotation, salary management, secondary employment conditions, remuneration, and social benefits are carried out in accordance with the principles of equal opportunity and fair treatment within Ballast Nedam. Providing equal employment opportunities to job applicants and treating employees and candidates without prejudice are fundamental to Ballast Nedam. Discrimination based on language, race, skin colour, gender, political opinion, union membership, religion, age, physical disability, sexual orientation, military service status, etc., among employees is unacceptable.

Ballast Nedam enforces a zero-tolerance policy against discrimination.

Examples of workplace discrimination are listed below:

- intentionally excluding male or female candidates during the recruitment process;
- selection between two individuals with similar performance and skill levels in promotion processes based on personal preferences (gender, nationality, etc.);
- making sexist remarks within the team;
- spreading offensive or derogatory comments, jokes, or images about people's ethnic background via e-mails or other communication channels.
- The zero tolerance policy is enforced for both employees and third parties.

Any form of discrimination is unacceptable and third parties are expected to adopt and implement the necessary internal policies to prevent, discourage, and avoid workplace discrimination.

3.2. Prevention of violence and harassment

One of the most efficient ways to protect the personal dignity of employees is to ensure that there is no form of harassment or violence in the workplace, or to address it with a zero-tolerance approach when such an incident occurs.

Ballast Nedam is committed to providing its employees with a workplace free from violence, harassment and other unsafe or uncomfortable conditions.

Ballast Nedam does not tolerate any form of physical, verbal, sexual or psychological harassment, racism, bullying, or threats and only collaborates with business partners who uphold standards similar to Ballast Nedam.

Examples of harassment that may occur in the workplace:

- Personal harassment: Offensive comments, humiliation, criticism, exclusion, and threats.
- Physical harassment: Intimidation, hitting, pushing or kicking, or engaging in threatening behaviour.
- Abuse of power: making excessive demands, making humiliating comments, intruding into the employee's private life and verbal intimidation.
- Online harassment: Gossiping online, sharing defamatory information via group chat, sending intimidating text messages.
- Sexual harassment: Sending sexual photos, inappropriate physical contact, and/or making sexually charged comments or questions.

3.3. Protection of Employees

Ballast Nedam does not tolerate any form of forced or compulsory labour and is strongly against slavery and human trafficking. Ballast Nedam expects all its business partners to act in line with these principles.

The right of children to education is sacred. Therefore, Ballast Nedam is strongly opposed to child labour, which can deprive children of their right to education and harm them materially or morally.

3.4. Protection of vulnerable groups

In its activities, Ballast Nedam takes into account the special circumstances of groups (indigenous peoples, women, national or ethnic, religious and linguistic minorities,

children, persons with disabilities, migrant workers and their families) as described in the United Nations Guiding Principles on Business and Human Rights.

Ballast Nedam identifies, as far as possible, vulnerable groups in the project areas and values working with many groups on local employment, women's employment and migrant issues. Ballast Nedam ensures that migrant workers within its organisation have the same conditions as non-migrant workers in similar positions.

3.5. Social gender equality

Gender equality broadly represents women and men's equal participation in all areas of social life and having equal rights. Men and women are always of equal value within Ballast Nedam. Therefore, women and men are treated equally and must not be discriminated against. Ensuring gender equality within the Group is the responsibility of Ballast Nedam.

3.6. Appropriate working conditions

Ballast Nedam complies with the working hours in accordance with the relevant laws and regulations in the countries in which it operates, and attaches importance to employees having a balanced business and private life.

Wages, overtime, compensation, and other fringe benefits are paid in accordance with local regulations in the countries in which Ballast Nedam operates. Appropriate performance evaluation systems are used to ensure that Ballast Nedam's employees can advance in their careers based on their competencies and performance.

In cases where Ballast Nedam provides accommodation to its employees, it establishes and implements policies regarding the quality and management of accommodation and basic services.

3.7. Ensuring the health and safety of workers

Providing a clean, organized, and safe working environment for employees and other individuals (such as the local community) affected by the business is a Ballast Nedam policy. To provide a healthy and safe workplace, Ballast Nedam complies with applicable workplace safety and industrial hygiene standards as required by law.

Ballast Nedam employees ensure the necessary participation in occupational health and safety training for a safe and healthy working environment and pay utmost attention to the measures. Employees report potential hazards and risks they detect in the workplace to their department supervisors and/or occupational health and safety departments at the workplace.

3.8. Talent management

Ballast Nedam attaches importance to employing talented personnel and supporting their professional and personal development. Ballast Nedam regularly assesses the performance and competencies of its employees, provides career counselling to its employees, and aims for long-term employment of high potential and talented employees.

3.9. Freedom of association and collective bargaining rights

The right of Ballast Nedam employees to join trade unions and/or associations, to organize, and to engage in collective bargaining without any coercion and fear of retaliation is respected. If its employees demand to be represented by trade unions, Ballast Nedam cooperates in good faith and within legal frameworks with the organisations that employees collectively choose to be represented by.

3.10. Participating in political activities

Ballast Nedam respects the private life and personal space of its employees. Employees are not pressured to support any political party, and they may voluntarily participate in political activities outside of working hours and make personal donations to a political party or a candidate. Employees are expected to conduct their political activities outside of working hours and not to use Ballast Nedam resources (email, tools, computers, telephones, etc.) for the purposes mentioned herein.

3.11. Workforce reduction

Ballast Nedam is considering alternative means before proceeding with collective redundancies due to economic, technical or organisational reasons. In cases where an alternative way is not found, the process is to be carried out in accordance with the applicable legal regulations and the principle of non-discrimination.

3.12. Protection of Confidentiality / Professional Confidentiality

Ballast Nedam commits to protecting all confidential information, including but not limited to personal data and trade secrets, of all its employees, customers, suppliers, business partners, and other third parties it is aware of. The standards are determined in accordance with local and foreign regulations and the practices of data protection authorities adopted by the countries in which Ballast Nedam operates.

4. Reporting violations

Any action against this policy or applicable legislation by an employee or third party can damage the reputation of the Group. Therefore, every employee and third party entering into a business relationship with Ballast Nedam is required to immediately report any actual or suspected violation in accordance with this policy through one of the channels indicated below.

Alternative channels for reporting are listed below:

- Compliance officers
- compliance@ballast-nedam.nl
- Internal message
- Ethical hotline of Ballast Nedam: 010-7007503 organisation code: 104938
Speakup QR-code:



Ballast Nedam takes all reports seriously. All reports received will be treated as confidentially as possible, unless there is a legal obligation to make them public.

Consult the sub-code "The reporting scheme" of Ballast Nedam for more information.



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