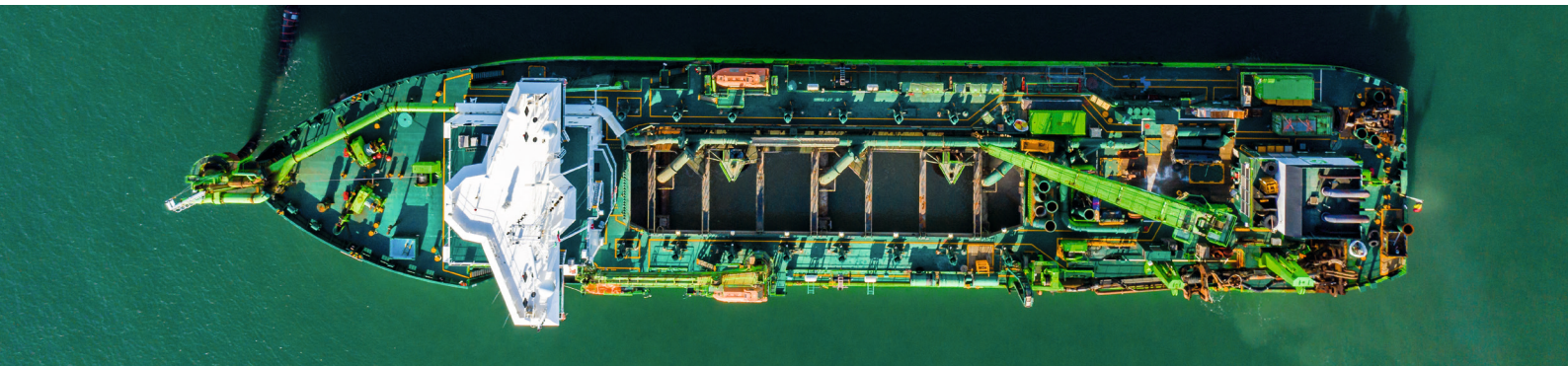




# CODE OF ETHICS & BUSINESS INTEGRITY for Business Partners



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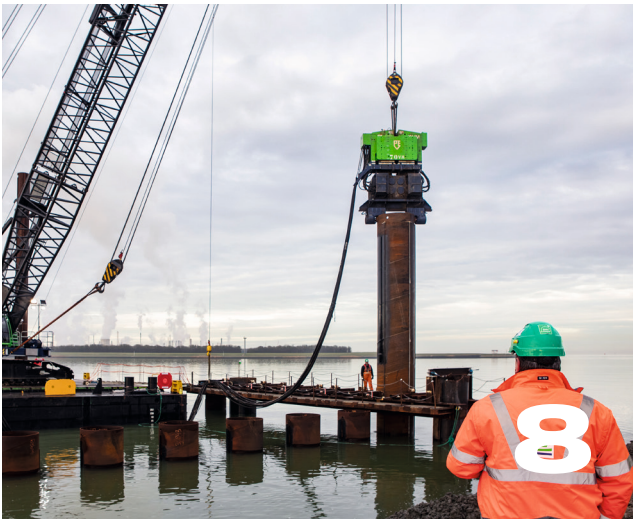
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# FOREWORD

## Dear colleagues

In DEME's rich history, which started more than 140 years ago, we find many examples of great achievements. We have truly become a world leader in dredging, marine engineering and environmental remediation.

When we reflect on this, we realise that this was only possible by living up to our core values and by building a solid reputation.

Our Code of Ethics & Business Integrity provides the guidelines and information we need to conduct our business responsibly, to make sound ethical business decisions and create trust for all our stakeholders.

The principles of our Code of Ethics & Business Integrity are both simple and clear: comply at all times with the applicable laws and regulations, act with integrity and honesty and avoid inappropriate behaviour, or even the appearance thereof. It is the personal responsibility and obligation of every company representative, manager and employee to adhere to these principles.

Our reputation was built over the course of decades, but can be harmed or even lost by just one thoughtless action. We encourage you to read this Code of Ethics and Business Integrity and apply it in your daily work. It will help us meet the highest level of integrity in our business actions and safeguard our reputation.

Yours sincerely,

**Luc Vandenbulcke**  
CEO DEME



# OUR CORE VALUES

DEME's core values reflect our unshakable belief in the quest to deliver excellence.

They serve as a compass that guides the way we work with our business partners, within communities and with each other.

The backbone of the Code is the general principle that we should always act with honesty and integrity in all matters. DEME defines integrity as doing the right thing. Furthermore, we should always comply with all applicable local and international laws and regulations. The purpose of our Code is to help our employees to engage in the right behaviour and to align with DEME's core values. Complying with our Code paves the way for stronger relationships – by enhancing trust between DEME and its stakeholders. Our Code and its affiliated documents provide useful guidance in making sound ethical business decisions in our day-to-day work and inspire dialogue about key ethics and compliance issues we may face.

## OUR MISSION

- We build a better, liveable world by offering solutions at the interface of land, water and energy.
- We specialise in Offshore Energy, Dredging, Marine Infrastructure, Environmental and Concessions projects.
- We deliver these projects in a safe, sustainable and efficient way.

## OUR VISION

We aim for a better, liveable world and sustainable future by creating value for all our stakeholders.

## OUR VALUES

We have established a set of standards applicable to our business units and subsidiaries worldwide. These core values demonstrate our commitment to consistently deliver excellence to our customers and value to our company. We also expect suppliers, subcontractors and partners to adhere to these standards.

## WE CARE

We care about the safety and wellbeing of our people. We live up to our safety DNA and work as one team. We respect each other's differences and value integrity. We promote a diverse workforce and personal development. We care about our projects, by working together with our clients and partners in delivering our projects successfully. We care about our planet, by taking care of the environment and society.

## WE DARE

We explore and innovate. We are open-minded and adapt to new experiences. We bring teams together to develop solutions.

We challenge ourselves, pushing boundaries. We seek alternative perspectives to solve client issues.

We invest in the future. We create innovative, sustainable solutions to meet the clients' needs

## WE DELIVER

We work together to understand what is needed and find solutions. We build on our experience and knowhow to improve operational efficiency and optimise cost of ownership. We deliver projects, results and create value.

We create impact. We are a trustworthy and reliable partner. We deliver excellence, beyond expectations.

We are committed. We do what we say. We take ownership and go the extra mile to get the job done.

# COMPLIANCE WITH OUR CODE

Our Code of Ethics & Business Integrity ([click here](#)) provides guidelines and information to our Personnel on how to conduct business responsibly, make sound ethical business decisions and create trust for all our stakeholders.

This Code of Ethics & Business Integrity for Business Partners ("Code") does the same for you, our valued business partner.

This Code is applicable worldwide in all our business engagements with our business partners of the DEME Group of companies, i.e. D.E.M.E. nv, its subsidiaries, affiliated entities and branches (together referred to as "DEME").

For this Code, we define business partners ("Partners") broadly as "any third party we conduct business with". This includes but

is not limited to our suppliers, (joint venture) partners, agents, intermediaries, (sub)contractors as well as any affiliate, subsidiary or business partner of our Partners, insofar they are involved in the business relationship with DEME. It also includes where relevant for the provisions of this Code, the Personnel of our Partners. This implies that we expect our Partners to communicate and ensure compliance with this Code throughout their organization and supply chain.

As we operate worldwide, we expect our Partners to maintain awareness and comply with all applicable laws, rules and regulations, in the countries where they operate. If these are in contradiction with the specific expectations of this Code, the highest standards should be applied.



# PROTECTING OUR PEOPLE

## Preventing Discrimination and Harassment

We are committed to achieving a positive work environment characterized by professional, courteous and respectful conduct, and with esteem for the worth of people. We believe every person should be treated equally with dignity and respect, regardless of their personal traits, beliefs, national or ethnic origin, culture, religion, age, gender, sexual orientation, political conviction or mental or physical ability.

Neither harassment nor bullying will be tolerated in any form or under any circumstance. Physical assault, threatening behaviour, verbal abuse or any other behaviour that has the purpose of or results in creating an intimidating, offensive, degrading or humiliating work environment are strictly prohibited.

We expect our Partners to uphold the same elevated standards for themselves, their Personnel and their stakeholders.

## Health and Safety

Safety is a joint responsibility and compliance with our safety requirements and quality processes is key. We expect our Partners to join and support us in providing each individual with a safe and healthy working environment by complying with health and safety rules and practices, by reporting accidents, injuries and unsafe equipment, practices or conditions.

There is no room for compromise in health and safety.

## Drugs and Alcohol

The use of alcohol and drugs in the workplace is not tolerated.



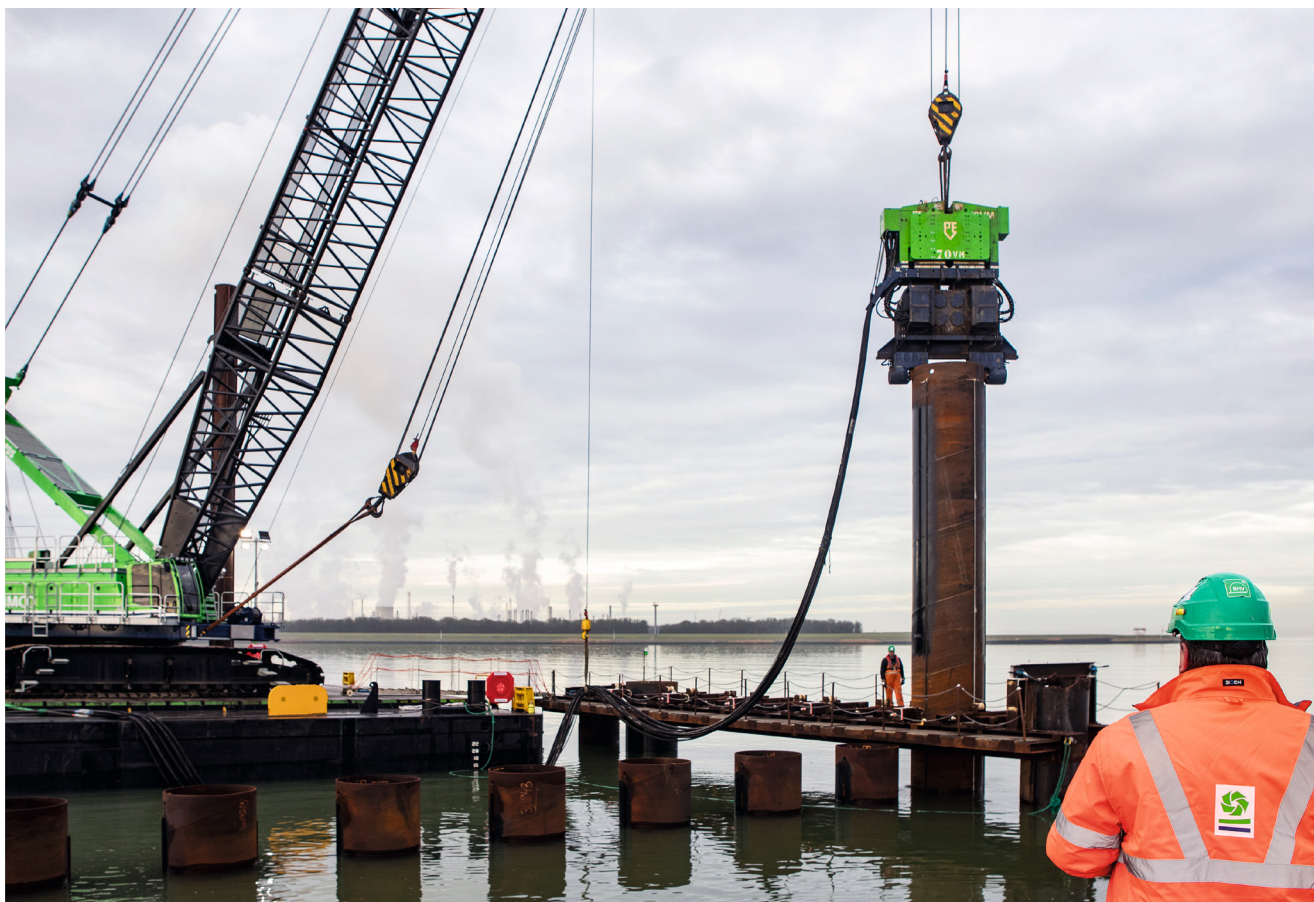
# PROTECTING OUR ASSETS

## Physical Assets

A physical asset is something that we own or hold in the broadest sense, and that has or can have a monetary value (e.g. equipment, vehicles, tools and supplies, etc.). Our Personnel must use physical company assets in an efficient, correct and legitimate way, solely for business purposes related to our activities. Whenever our Partners encounter DEME assets, we require them to do the same. Any type of theft, fraud or embezzlement of company assets will not be tolerated.

## Confidential Information

Our Intellectual property and confidential information must be safeguarded at all times. Our Partners are allowed to disclose information to third parties only when this is authorised by DEME prior to disclosure or when legally obliged to do so.





# ETHICAL BUSINESS PRACTICES

## Anti-Bribery and Anti-Corruption

DEME is committed to conducting its business with integrity. Therefore we do not and will not tolerate corruption or bribery in any form.

No one within DEME shall at any time offer, promise, give, request, agree, receive or accept bribes. As such, we must be extremely careful in our business dealings as a bribe can take many forms and is not always obvious.

## Gifts and Hospitality

Gifts or hospitality should be treated with careful consideration and vigilance. In certain situations, they may contribute to successful working relationships in appropriate circumstances and to a certain extent. However, they can easily create the impression of influencing or trying to influence an action or a decision.

We allow giving or accepting gifts or hospitality only where it is reasonable, proportionate and appropriate under the given circumstances and never when the intent is to secure an improper advantage or to influence a business decision.

We expect our Partners to refrain from presenting gifts and/or hospitality to our Personnel when the above circumstances are not met and to report in accordance with the 'Raising and Reporting Integrity Issues'-section of this Code any improper gifts and/or hospitality offered to you by our Personnel.

## Antitrust and Competition

We strive to do fair business with all our stakeholders. Consequently, we expect our Partners to act within the boundaries of applicable antitrust and competition laws when competing in the market.

## Third Parties

We perform integrity checks on our Partners. This investigation will differ based on the compliance risk level attributed to our collaboration. We expect our Partners to provide reasonable assistance to support such integrity checks.

## Conflicts of Interest

We expect our Partners to avoid making use of any personal or private interests to influence business decisions. In the event that an actual or potential conflict of interest should arise during our business relationship, our Partners should proactively disclose this to the DEME Compliance Department.

## International Trade Laws

We expect our partners to conduct their business in compliance with UN, EU, UK and/or US economic sanctions, embargoes and applicable laws and regulations governing export, re-export, import of products, technical data, software and services. In addition, we expect them to inform us should they ever become subject to such international sanctions.

## Accounting Standards and Records

We expect our Partners to work in accordance with accounting standards and procedures that provide full and transparent disclosure to stakeholders and regulatory authorities.



# ENGAGING IN CORPORATE SOCIAL RESPONSIBILITY



## Sustainable Value Creation.

It is our ambition to fundamentally contribute towards sustainable solutions for the global environmental, societal and economic challenges which our world faces today.

## Communities

Our Partners should join us in striving to create a positive influence on the local communities in which we work, with a goal to increase the resilience of these communities to cope with economic, environmental and social challenges and to build collaborative relationships through consultation, engagement and participation.

## Human Rights

Respect for the individual is key for DEME and at the heart of our core values. We respect and protect human rights and ensure that we do not exploit anyone, wherever we work in the world. Everybody we do business with must uphold the same standard.

We will never tolerate slavery, child labour, forced or compulsory labour or human trafficking. We respect the fundamental rights and freedoms as declared in the United Nations Universal Declaration of Human Rights.

Our business Partners are expected to uphold the same, high ethical values and standards, for themselves and throughout their supply chain.

## Social Dialogue

We are convinced that social dialogue and open communication between employees and management is the most successful way to operate our business. To ensure effective social dialogue it should always be organised in accordance with the local laws and regulations of the countries we work in.

We encourage our partners to engage in a similar approach towards an active social dialogue with their Personnel and stakeholders. However, as a minimum standard, we require you to always adhere to the applicable laws and regulations of the countries in which you are active.

# MONITORING AND COMPLIANCE

Our Compliance Department oversees the DEME compliance program, including application of the present Code. In case of doubt or questions on this document, you may reach out to them via your usual DEME business contact or directly at [compliance@deme-group.com](mailto:compliance@deme-group.com).

We reserve the right to monitor your adherence to this framework by conducting or engaging a third party to conduct (on-site) audits. We expect our Partners to provide reasonable assistance to support such audits.

When there is a reason for concern, such as lack of cooperation or failure to address violations of this Code, we will take appropriate, corrective measures. Persistent failure to comply with our Code can be considered a material breach and may result in the termination of our business relationship.

# RAISING AND REPORTING INTEGRITY ISSUES

We believe that the final building block of any successful integrity programme is the possibility for a concerned third party to raise integrity concerns without fear of reprisal. We all have the duty to promptly report any known or suspected violations of our Code, as well as any violation of applicable laws and regulations.

Your integrity concerns may be communicated on a disclosed or anonymous basis and can be filed:

- by email: [compliance@deme-group.com](mailto:compliance@deme-group.com);
- by telephone at: +32 3 250 53 06 (during business hours);
- by regular mail: Attn. Chief Compliance Officer, Scheldedijk 30, 2070 Zwijndrecht, Belgium.

Regardless the manner of escalation, all matters are reviewed carefully and investigated with the highest discretion. We strictly prohibit reprisal, threats or retaliation against any person who has reported a violation in good faith or who is assisting in an investigation, regardless whom the report concerns.

We are confident that compliance with our Code enhances trust between DEME and its stakeholders and paves the way for stronger, lasting relationships.

Only with your help can we meet the highest level of integrity in our business actions.

**Compiled and Coordinated by DEME**  
Compliance Departement

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**Graphic Design**  
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