



COMPLIANCE POLICY

DREDGINGINDUSTRIES.NL



1. Purpose and scope

This Compliance Policy describes the framework within which Holland Dredging Industries BV (hereinafter: **HDI**) operates in order to comply with applicable laws and regulations. The purpose of this document is to manage legal and reputational risks and to ensure ethical, transparent and responsible business practices.

This policy applies to: - all HDI employees; - directors and management; - temporary staff, consultants and intermediaries; - business partners and suppliers, where relevant.

2. Principles

HDI applies the following principles: - compliance with all applicable laws and regulations is a minimum requirement; - integrity, transparency and responsibility are central; - compliance is a shared responsibility; - violations are taken seriously and followed up appropriately.

3. Relationship to the Code of Conduct and Supplier Code of Conduct

This Compliance Policy forms the legal and organisational framework of HDI and supplements: - **HDI's Code of Conduct** (internal employee conduct); - **HDI's Supplier Code of Conduct**.

Whereas the Code of Conduct and the Supplier Code of Conduct are normative and ethical in nature, this Compliance Policy focuses on enforceable laws and regulations, governance and risk management. In the event of any conflict, this Compliance Policy shall prevail.

4. Laws and regulations (core areas)

HDI complies with the following laws, regulations and standards, among others:

4.1 Privacy & data protection (GDPR)

- Personal data is processed lawfully, carefully and transparently;
- Data is only processed for specific purposes;
- Appropriate technical and organisational measures have been taken;
- Data breaches are reported in accordance with legal obligations;
- Data subjects can exercise their rights (access, correction, deletion).

4.2 Labour law and working conditions

- Compliance with labour legislation, collective labour agreements (if applicable) and health and safety obligations;
- Equal treatment, non-discrimination and a safe working environment;
- Focus on safety, health and security, particularly in view of work in high-risk (international) environments.

4.3 Competition law

- No participation in cartels;
- No price fixing or market sharing agreements;
- Fair competition and transparent market practices.

4.4 Anti-corruption and anti-bribery

- Zero tolerance for bribery and corruption;
- Prohibition on offering, requesting or accepting inappropriate benefits;
- Gifts, hospitality and donations only if approved in advance, proportionate and documented;
- Extra vigilance in contacts with government officials and port authorities.

4.5 Sanctions legislation, export control and international trade

- Compliance with national and international sanctions regimes;
- No transactions with sanctioned countries, entities or individuals;
- Screening of business relationships, intermediaries and projects where relevant.

4.6 Financial integrity and administration

- Accurate, complete and verifiable administration;
- Transparent financial reporting;
- Prevention of fraud, money laundering and tax evasion;
- Cooperation with audits and due diligence investigations.

4.7 Environment, human rights and sustainability

- Compliance with applicable environmental legislation;
- Respect for human rights and local communities;
- Responsible management of environmental impact in dredging, land reclamation and mining activities.

5. Internal organisation and responsibilities

5.1 Management

- Ultimately responsible for compliance within HDI;
- Appoints the Compliance Officer;
- Ensures sufficient resources, independence and powers;
- Sets the right example ("tone at the top").

5.2 Compliance Officer

HDI appoints a Compliance Officer who is responsible for: - supervising compliance with this Compliance Policy; - advising management and employees on compliance issues; - assessing and following up on reports; - coordinating internal investigations; - reporting to management.

The Compliance Officer acts independently and without undue influence.

5.3 Employees and third parties

- Knowing and complying with this Compliance Policy;
- Reporting (suspected) violations or risks;
- Cooperate in investigations and audits.

6. Reporting procedure (Whistleblower procedure)

HDI encourages the timely reporting of (suspected) violations of laws and regulations, this Compliance Policy or related policy documents.

6.1 What can be reported

- Violations of laws and regulations;
- Violations of this Compliance Policy;
- Corruption, fraud or conflicts of interest;
- Violations of sanctions legislation;
- Serious safety, environmental or integrity risks.

6.2 How to report

Reports can be made: - to the Compliance Officer; - to the management (if the Compliance Officer is involved); - in writing or verbally via the designated contact details.

6.3 Protection of whistleblowers

- Reports made in good faith will not result in any disadvantage;
- Retaliatory measures are strictly prohibited;
- Confidentiality is guaranteed to the maximum extent possible;
- Anonymous reports will be treated seriously as far as possible.

6.4 Investigation and follow-up

- Reports are investigated carefully, independently and in a timely manner;
- Where possible, the person making the report is kept informed of progress;
- Appropriate measures are taken if violations are identified.

7. Violations and sanctions

Violation of this Compliance Policy may result in: - disciplinary measures; - suspension or termination of the employment or contractual relationship; - civil liability; - reporting to competent supervisory bodies or authorities if required by law; - compensation if HDI suffers damage as a result of non-compliance.

8. Training and awareness

HDI will provide appropriate information and awareness training on compliance, tailored to the position and responsibilities.

9. Evaluation and updating

This Compliance Policy is periodically evaluated and, where necessary, adapted to changes in legislation or business activities.

10. Final provision

This Compliance Policy comes into effect on [date] and has been adopted by the management of Holland Dredging Industries BV.

Together with the Code of Conduct, Privacy Statement and other policy documents, this document forms HDI's integrity and governance framework.