

SPEAK UP POLICY



INTRODUCTION

Royal Boskalis (together with its subsidiaries “Boskalis”) is committed to conducting business with integrity, honesty and fairness. We, being all Boskalis employees throughout the world, do this in compliance with applicable laws and the Boskalis Code of Conduct and its underlying policies.

Boskalis is a responsible multinational enterprise. Our purpose is to create and protect prosperity and advance the energy transition. Boskalis plays a pivotal role in keeping the world moving both on land and at sea. The areas where we can make the largest contribution, both to the world economy and sustainable development, are tied to our business, our people and our activities. Boskalis strives to create a working climate in which employees are expected to put the Boskalis Code of Conduct into practice and are encouraged to raise questions and concerns. In that respect it is important that communication between Boskalis and its employees is open and clear and that Boskalis is open to suggestions, ideas and feedback.

The Speak Up Policy is developed in line with applicable international and national laws and the OECD Guidelines for Multinational Enterprises.

The Speak Up Policy describes how Boskalis offers its employees the possibility to report any (suspected) misconduct within Boskalis to a confidential and independent counselor without the risk of any retaliation. Such a report can be made anonymously and on a 24/7 basis.

TO WHOM DOES THIS POLICY APPLY

The Speak Up Policy applies to Boskalis, its subsidiaries and all its employees performing work for Boskalis throughout the world. This includes employees and persons working for Boskalis through an employment agreement, working through an employment agency or as an intern. Any reference to ‘you’ in the Speak Up Policy refers to persons in this group.

Integrity, openness, honesty and fairness are fundamental principles of the way we do business, and we promote the same principles in our relationships with clients, suppliers and other business partners.

External stakeholders may bring forward their grievances via the Grievance Policy.

WHAT TO REPORT

The Speak Up Policy describes how Boskalis offers its employees the possibility to report any (suspected) misconduct within Boskalis to a confidential and independent counselor without the risk of any retaliation. Such a report can be made anonymously and on a 24/7 basis. If you know or you suspect any (potential) misconduct within Boskalis, you are urged to speak up as soon as possible, so it may be addressed in a timely and appropriate manner.

(Potential) misconduct are issues which are not in line with applicable laws or the Boskalis Code of Conduct. These may be of a general, safety, financial, operational, social or employment nature, including but not limited to violation of health- and safety procedures, discrimination, racism, (sexual) harassment, fraud, bribery or other criminal acts and environmental misdemeanors.

It is important to note that this Speak Up Policy does not replace any legal reporting or disclosure requirements. Where statutory reporting requirements and procedures exist, these must be fully complied with.

WHERE & HOW TO REPORT

Boskalis offers different ways to speak up. It depends on the situation at hand and the seriousness of the (suspected) misconduct which person might be most appropriate to discuss your concerns with.

You are encouraged to raise your concerns first with your (direct) manager or your manager Human Resources, because this is often the best way to resolve an issue swiftly in the spirit of open communication. In addition, you may always consult your Social Safety Officer, who will treat any consult on a confidential basis. The responsibility of the Social Safety Officer is primarily to listen, to think along with you and help to find a solution. The Social Safety Officer is there to provide support and advice and is not personally involved in any investigation or implementation of measures. The Social Safety Officer may inform the Boskalis Counselor of your report only after you have given your prior consent thereto. At the locations where a Social Safety Officer has been appointed, the contact details of the Social Safety Officer are available on the local Intranet.

If you do not feel comfortable to discuss your concerns with your (direct) manager or your manager Human Resources or your Social Safety Officer, you may report the (suspected) misconduct to the Boskalis Counselor.

The Boskalis Counselor is an independent counselor, who will treat any reports under this Speak Up Policy on a confidential basis. You can choose to make a report in writing, by telephone or at request (within a reasonable period) in a face-to-face meeting. You can also elect to make your report to a female counselor. The current female counselor is employed by the HR department. Notwithstanding her position, the female counselor will treat your report in the same manner as the Boskalis Counselor.

The Boskalis Counselor may be reached by e-mail at boskalis counselor@boskalis.com and the female counselor may be reached by e-mail at female counselor@boskalis.com. The full contact details of the Boskalis Counselor and the female counselor can be found on BokaNet.

You may make your report on an anonymous basis by sending an e-mail from an anonymous e-mail address. Boskalis recognizes that an anonymous report may be the only alternative in extraordinary circumstances, although in general it will be more difficult to investigate the reported (suspected) misconduct and to protect the person who made the report. The Boskalis Counselor and/or Boskalis shall not try to find out the identity of the person submitting such an anonymous report.

When you file your report, please include as many details as possible, such as the nature of the (suspected) misconduct, the persons involved, the time and place when and where it occurred, the discussions and actions which have already taken place regarding the (suspected) misconduct and all other information that might be relevant. A report can only be followed up if it contains sufficient information and there is a reasonable possibility of obtaining further information.

You may make your report in your own language. If necessary translation services shall be provided.

HOW YOUR REPORT IS TREATED

The Boskalis Counselor will make a record of your report with date upon which it has been received. You will be given the opportunity to review the report, make comments and sign for approval. You will receive a confirmation of the receipt of the report submitted to the Boskalis Counselor in writing within seven (7) calendar days after it has been received.

You, the Boskalis Counselor, and all persons who have been informed about your report, will treat the report, the existence of a (potential) investigation and/or the outcome and recommendations as confidential. Your report will only be disclosed to those persons who need to know for the purposes of handling a report and any investigation. No information will be disclosed outside this group, unless obliged by applicable laws or necessary for the prevention of serious risk to public health, safety and the environment or the prevention of crime or the prosecution of a criminal offence. In such case, you will receive a prior written notice explaining why your information is being provided, unless this could jeopardize the investigation or the procedure.

The Boskalis Counselor shall take your report immediately into consideration and gain information in relation to the report. It is possible that you will be asked to clarify matters. Based on this information the Boskalis Counselor shall decide which actions are appropriate and necessary. If there is insufficient information for an investigation or if the report was made in bad faith, the Boskalis Counselor can decide to take no further action.

You may at all times in confidence consult an advisor concerning your report relating to the (suspected) misconduct, provided that such a person is bound by a duty of confidentiality.

Every report is taken seriously. The Boskalis Counselor therefore has the opportunity to inform the Chairman of the Board of Management of Boskalis of a report, unless the report concerns one of the members of the Board of Management. In that case the Boskalis Counselor will inform the Chairman of the Supervisory Board of Boskalis.

The Boskalis Counselor shall work in accordance with applicable laws and the Boskalis Code of Conduct. All persons involved shall be treated with fairness, respect, objectivity and impartiality. Persons are presumed innocent until proven otherwise.

The Boskalis Counselor shall, where possible, inform you within three months of acknowledgement of the receipt of the report on the overall findings and any recommendations (if any). Please note that Boskalis may not be able to give you full details of the investigation or outcome for reasons of confidentiality, privacy and legal rights of all concerned.

Information relating to a report is kept as long as necessary for the handling of the report or other legal obligations and will be processed in accordance with applicable laws and the Boskalis Privacy Policy.

HOW WILL YOU BE PROTECTED

Boskalis will protect persons who have spoken up in good faith and ensure that they shall not suffer any retaliation or detriment as a consequence of making a report. The fact that you have made a report in good faith in relation to (suspected) misconduct will not affect your employment or career possibilities at Boskalis. Boskalis will not accept any harassment or retaliation by other persons within Boskalis as a consequence of making a report and will take appropriate measures. This may include disciplinary measures.

It is always assumed that reports are made in good faith. Abuse of the Speak Up Policy will be taken seriously. A report that is deliberately not made in good faith may lead to disciplinary measures.

GOVERNANCE

Compliance with the Speak Up Policy is monitored by the Boskalis Counselor and the Compliance Officer.

The Board of Management and the Compliance Officer review the content of this policy every two years.

WHERE CAN YOU FIND THE SPEAK UP POLICY

The Speak Up Policy is available on the Boskalis website (www.boskalis.com) and on BokaNet. If you do not have access to BokaNet, please contact the Compliance Officer (compliance.officer@boskalis.com).

WHERE CAN YOU LEARN MORE ON THE SPEAK UP POLICY

All new employees receive a copy of the Speak Up Policy when they start working for Boskalis. In addition, targeted trainings are organized to explain how to apply the Speak Up Policy.

If you have any questions with regard to the Speak Up Policy, please discuss them with your (direct) manager or your Human Resources manager. In addition, you may always contact the Compliance Officer (compliance.officer@boskalis.com).

GENERAL DOCUMENT DATA

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All printed copies of this document are considered 'Uncontrolled Copies'. Go to www.boskalis.com to find the current controlled version of this document. In the event of any discrepancies between the English version of this document and a translated version, the English document is binding.

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