

Brunel International N.V. Global Code of Conduct

About Brunel

Founded in 1975, Brunel is a global specialist delivering customised project and workforce solutions to drive sustainable industry transformations through technology and talent. With a broad international presence and a strong network of experts worldwide, we deliver Project and Consulting Solutions, Workforce Solutions and Global Mobility Solutions that transform global projects in Renewables, Conventional Energy, Mining, Life Sciences, Future Mobility, Industrials & Technology and many other sectors.

Guided by our passion for people and a commitment to integrity, we recognize our ability to create positive social and environmental impact. Our strategy embeds Environmental, Social, and Governance (ESG) principles at the heart of everything we do, driving sustainable and responsible growth across all markets.

Scope

This policy applies to all Brunel regions and entities, covering every aspect of our operations and partnerships.

Brunel safeguards the continuity of the company and works towards achieving - in both the short and long term - a healthy return on capital, which is proportionate to the degree of risk within the sector. The company sees clarity and transparency in supervision and accountability as the mainstays of proper management and business practice. Brunel has an open business culture that is characterised by professionalism and an entrepreneurial approach.

With respect to its clients, investors, staff and suppliers, Brunel considers itself responsible for compliance with the applicable national and international regulations and social standards. Integrity is vital for building and maintaining the company's reputation.

In the performance of their activities, Brunel staff members are required to avoid the entanglement of interests between business activities and personal (financial) concerns.

The company's financial and operational accounting systems, including the underlying documents, must accurately represent and account for the nature of the transactions performed.

The applicable national and international labour standards must be observed within the company. Human resource management is conducted on the basis of individual staff members' capacities, and personal development is encouraged.

Improper conduct, such as discrimination, intimidation and misuse of authority, is not tolerated. As far as possible, action is taken to prevent moral dilemmas in the execution of tasks, and suitable solutions are sought in the event that such situations do arise.

Brunel only conducts business with reliable parties and takes their needs and interests into account as far as possible in all aspects of the business relationship. Honest and open competition plays an important role in this regard. Agreements must be set down in writing and complied with on a consistent basis.

Brunel aims to maintain the highest level of integrity in its relations with staff members, clients, investors and suppliers. Invitations and/or favours that could jeopardise the integrity of these relationships may not be accepted.

The board of directors has appointed a confidential representative to effectively combat undesirable conduct and to make it easier for the parties involved to talk about such conduct and file an official report, if desired. The staff member and/or supervisor can meet with the confidential representative to discuss the situation in confidence.

Individuals working at Brunel are encouraged to raise concerns about any issue or suspicion of malpractice by following the whistleblowing procedure. Individuals can share their concerns anonymously and the information can be submitted in multiple languages. Brunel is committed to protecting the privacy of everyone involved in the SpeakUp process.

Brunel is responsible for ensuring that any staff member who files a report at Brunel in good faith is not treated unfairly in any way as a result of that action. Nor will the position of the confidential representative be damaged in any way as a result of the performance of his/her activities by virtue of these regulations.

Brunel is responsible for compliance with this Code of Conduct. All requests, suggestions and complaints concerning these regulations from staff members will be taken into serious consideration.

Deployment and Governance of the Global Code of Conduct Policy

Our commitment to ethical behaviour and integrity is led from the top by our CEO, with leaders held accountable for fostering a workplace culture that adheres to the highest standards of integrity and professionalism. Our CEO owns the overall policy and programs, overseeing its implementation across all regions. It is our objective to maintain the company's entrepreneurial spirit while ensuring ethical business practises across all regions. Developing a tailored regional approach to ethical business practices is a regional responsibility.

Each region's approach must be guided by the following principles, with regional management accountable for ensuring that they:

- Manage and promote ethical business practises and behaviour in line with this policy

- Adhere to all applicable laws and regulations in local regional businesses through developing regional specific Code of Conduct policies for employees, contractors and suppliers if required.
- Treat compliance with the global Code of Conduct as a critical business activity
- Ensure that upholding ethical standards is a line management responsibility
- Develop internal and external communication to support policy deployment, awareness and implementation.