

Brunel International N.V. Global Conflict of Interest Policy

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.

1. Purpose

At Brunel, we are committed to conducting business with honesty, integrity, and transparency. We uphold the highest ethical standards and expect all employee to act in compliance with applicable laws, the Brunel Code of Conduct, and its supporting policies and procedures. Conflicts of interest, whether actual or perceived, can compromise trust, decision-making, and the ethical foundation of our business. This policy establishes a framework to identify, disclose, and address potential or actual conflicts of interest to ensure transparency, accountability, and the continued integrity of our operations.

2. Commitment

At Brunel, we recognise the importance of maintaining transparency, integrity, and accountability in all aspects of our operations. We are dedicated to identifying, managing, and mitigating conflicts of interest to ensure ethical and sustainable practices. This commitment includes proactively establishing processes to identify potential conflicts across all business activities, implementing procedures to resolve any conflicts and holding all stakeholders accountable for promptly disclosing any actual or perceived conflicts.

3. Who is covered by this policy?

This policy applies to all individuals working at all levels of Brunel, including members of the Board of Directors, the Supervisory Board and all Brunel employees (collectively referred to as "employees" within this policy).

4. What is a conflict of interest?

A conflict of interest is any situation where a person's private interests have the potential to influence their professional decisions. A conflict of interest occurs when an individual's personal interests clash with their professional duties, leading to biased decisions, unethical actions, or harm to an organisation's integrity. In the workplace, these conflicts can damage trust, skew decision-making, and lead to unfair practices.

4.1 Examples of Conflicts of Interest

Examples of potential conflicts include, but are not limited to:

- Prioritising family or personal relationships over more qualified candidates in hiring or promotions, supplier selection processes and/or other commercial relationships.
- Accepting gifts or favours from candidates, clients and/or suppliers that may influence decision-making. Even if there is no direct expectation of reciprocity, the potential for biased decision-making increases.
- Participation in other activities including a second job or side business that may conflict with the performance of your duties for Brunel. Employees who work for another company that competes with Brunel may face conflicting loyalties. Dividing attention between two competing businesses can lead to poor performance or breaches of confidentiality.
- Responsibilities as board member of any organization that conducts business that may, or may not, compete with Brunel's business interests.
- When you have, or any person with whom you have a close relationship has, an ownership or equity interests greater than 5% in an organisation that is providing services to Brunel or receiving services from Brunel.
- When you are involved in activities or are facing a situation that is not covered under any of the above examples but which you think might be, or might be perceived as, a conflict of interest with respect to Brunel.

5. Raising and reporting a conflict of interest concern

All employees have a responsibility to identify and disclose conflicts of interest, whether actual, potential, or perceived, and take appropriate steps to address them to protect the integrity of our company and decision-making processes. The below overview provides details on the reporting and review process:

- **Reporting the conflict** - When a potential conflict of interest is recognised, it must be reported to an immediate supervisor, department head, or the HR team member as soon as possible. All relevant facts and circumstances surrounding

the situation that creates, or might create, a conflict of interest should be included. This includes the nature of the potential conflict, the parties involved, and potential impacts on the role or Brunel's operations.

- **Wait for the formal decision** - Brunel will evaluate the conflict and determine the appropriate course of action. Until a decision is made, it may be necessary to:
 - Step down from specific decisions, projects or discussions.
 - Adjust roles or responsibilities to eliminate the conflict.
- **Acknowledge and act on the decision** - Once the decision is communicated, confirmation of understanding is required, along with a commitment to adhering to the agreed steps to manage the conflict.

6. Confidentiality

To ensure the integrity of the conflict of interest reporting process, Brunel emphasises the importance of handling sensitive conflicts with the utmost care. Brunel commits to safeguarding the confidentiality of all reported conflicts and ensures that the process remains impartial and fair. Any conflicts will be addressed transparently, and appropriate steps will be taken to mitigate potential risks, including those related to sensitive and/or personal information. Employees are encouraged to report conflicts without fear of retaliation, and their concerns will be treated with respect and confidentiality throughout the resolution process. If employees feel the need to report conflicts anonymously, they may do so via the **SpeakUp line**, as outlined in our Whistleblowing Policy.

7. Link to other global policies

This policy is a set of defined expectations captured in Brunel's Global policies. This policy should be read in conjunction with the policies below:

- Anti-Bribery and Corruption Policy
- Code of Conduct
- Whistleblower Policy

The policies above can be found on the internal Connect policies pages and on www.brunelinternational.net => Corporate Governance => Governance documents

8. Deployment and Governance of the Conflict of Interest Policy

Our commitment to promoting integrity and ethical behaviour is driven from the top by our CEO, and all employees are held accountable for fostering a workplace culture where conflicts of interest are identified, disclosed, and managed appropriately. The Board of Directors is responsible for adopting this Global Policy. The Head of Legal owns the overall policy and related programs, and oversees its implementation across all regions. Regional management is responsible for ensuring that all principles in this policy are implemented locally and adhered to consistently. The deployment of this policy shall be guided by the following principles through which regional management shall, in collaboration with Brunel International:

- Establish clear processes and procedures to identify, disclose, and manage conflicts of interest cases in line with this policy; and
- Promote a transparent and ethical workplace culture by encouraging employees to proactively disclose potential conflicts of interest without fear of negative consequences through effective communication channels and training sessions; and
- Develop communication and training programs to raise awareness of conflict of interest risks and ensure employees understand their responsibilities for reporting and managing conflicts.