

Brunel International N.V. Global Human Rights and Modern Slavery 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. Our Purpose

Brunel has a zero-tolerance for any form of human rights violations including forced labour, human trafficking or child labour in its own operations and value chain. Brunel expects all who have, or seek to have, a business relationship with the Company to familiarise themselves with this policy and to act in a way that is consistent with our corporate values of Entrepreneurship, Integrity, Results driven and Passion for People. We recognise the importance of standing by these values to safeguard our reputation and promote growth in an ethical and sustainable way.

2. Our Commitment

Brunel is committed to being a responsible corporate citizen, respecting human rights and supporting the protection and advancement of human rights. With operations around the world, we strive to uphold global standards for responsible business, including equal opportunity, the freedom to associate and bargain collectively, and the elimination of modern slavery, human trafficking and harmful or exploitative forms of child labour. We exercise our influence by conducting our business operations in ways that seek to respect, protect and promote the full range of human rights such as those described in the United Nations' Universal Declaration of Human Rights.

Although we believe that governments around the world bear primary responsibility for safeguarding human rights, we acknowledge the corporate responsibility to respect human rights as articulated in the United Nations' Guiding Principles (UNGP) on Business and Human Rights and as set out by the eight fundamental human rights identified by the International Labour Organisation (ILO). Brunel complies with the laws and regulations of the countries in which we operate while simultaneously conducting our business and



encouraging the promotion of human rights through our own policies, standards and practices.

3. Deployment and Governance of the Policy

Our commitment to upholding Human Rights and Modern Slavery is led by our CEO, with accountability placed on all Brunel employees to ensure that respect for Human Rights and Modern Slavery is embedded in the way we conduct business. The Board of Directors is responsible for endorsing and adopting this policy. The CEO also owns the overall policy and programs and oversees the implementation across all regions. It is our objective to uphold Brunel's ethical business practises and to reinforce management leadership within the Brunel businesses, therefore developing a regional approach to Human Rights and Modern Slavery is a regional responsibility. Each regional's approach is to be guided by the following principles and local law, through which regional management, in collaboration with Brunel International, shall:

- Manage operations and decision making in line with the intent of this policy
- Align all regional Human Rights and Modern Slavery practices with this global policy.
- Ensure regional deployment of this policy is effectively implemented
- Establish tailored internal and external communication programs to support policy deployment and awareness
- Regular review and enhancement of our Human Rights and Modern Slavery policy and practises through stakeholder engagement and collaboration to effectively prevent and address Human Rights and Modern Slavery risks proactively.

4. Grievance and Remediation

Our **Whistleblower Policy** provides an avenue to raise concerns about any potential Human Rights and Modern Slavery violations and we encourage the reporting of any concerns relating to Human Rights and Modern Slavery issues from our employees, contractors and business partners.

Brunel commits to providing access to appropriate remediation support in the event of adverse human rights impacts that we have caused or contributed to. We will ensure that remediation is delivered through legitimate and rights compatible and transparent processes. These processes may include initial screening, assignment of responsibility, investigation, and (where appropriate) engagement of independent experts or mediators. Based on findings, appropriate remedies may include restitution, compensation, rehabilitation, and guarantees of non-repetition, and will be determined in consultation with affected stakeholders while respecting local laws and internal policies. Remedies will be proportionate to the harm and compatible with international and local human rights laws. We will remain committed to taking appropriate action that is consistent with our human rights policy and to continuously improving our remediation practices through stakeholder engagement, monitoring, and review.