

Brunel International N.V. Global Whistleblower 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 International N.V. and within its subsidiaries we are committed to conducting all our business in an honest and ethical manner, having full commitment to open communications, and we expect all staff to maintain high standards and act in compliance with applicable laws and the Brunel Code of Conduct and its underlying policies and procedures.

However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them if they do occur. This policy sets out a framework within which you will be able to raise concerns in relation to the matters set out in Section 3.

2. Who is covered by this policy?

This policy applies to all individuals working at all levels of Brunel, including senior managers, officers, directors, employees, consultants, contractors, trainees, and third-party contractors (collectively referred to as "staff" within this policy).

3. What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or irregularities within Brunel by a person who works or has worked within the organisation, or at another organisation if they have come in contact with Brunel through their work.

Examples of (potential) wrongdoing are issues which are not in line with applicable laws. These may be an act or omission whereby the public interest is at stake in the event of danger to public health, to the safety of persons, to environmental degradation or the proper functioning of a public service or company due to improper acts or omissions. Irregularities may include criminal or unlawful activity, discrimination, danger to health and safety, damage to the environment, failure to comply with any legal obligation or regulatory requirement, bribery, incorrect financial reporting, breach of our internal policies and procedures including the Code of Conduct, fraud or mismanagement, negligence, other activities which amount to serious improper conduct and the deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern in good faith relating to any of the above matters arising from knowledge that the person has acquired with his employer or arising from knowledge that the person has acquired through his work with another company or organisation. If you have genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a "whistleblowing concern") you should report it under this policy. Reports of whistleblowing concerns are seen as a contribution to improving the functioning of the organisation and will be taken on seriously. Staff has the opportunity to consult a confidential adviser about suspected wrongdoing or irregularity.

This policy should not be used for complaints relating to your own personal circumstances, such as your pay and employee benefits. This policy does not replace existing procedures for individual complaints, for example in the field of HR reviews. If you are uncertain whether something is within the scope of this policy, you may seek advice from a trusted advisor or contact the Whistleblower Officer whose contact details are at the end of this policy.

4. Raising and reporting a whistleblowing concern

We hope that in many cases you will be able to raise any concerns with your line manager. You may tell the manager in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact the Whistleblower Officer via SpeakUp.

SpeakUp is a reporting tool enabling our staff to report a whistleblowing concern related to suspected wrongdoing or irregularities at work in complete anonymity. It is a free and confidential service that is available by phone, via a secure website, and via an app any time of the day. [Contact details](#) are set out at the end of this policy. Via SpeakUp, you can report a whistleblowing concern in writing or by phone. It is also possible to request for an interview at a location within a reasonable timeframe.

All personal data provided under this Whistleblower policy will be processed in accordance with [Brunel's Privacy Policy](#). By making a report, you consent to the use of any personal data provided (including your identity, unless you have made your report

on an anonymous basis) for the Brunel Whistleblower Officer to investigate and for Brunel, where necessary, to handle and remediate the reported (suspected) misconduct.

5. Confidentiality

We hope that staff will feel able to report whistleblowing concerns openly under this policy. Anyone who is involved in a report or investigation into suspected wrongdoing or irregularity and in doing so obtains information of which the confidential nature should reasonably be assumed, is in principle obliged to keep such information confidential. Data of a confidential nature shall in any case include: a) information about the identity of a whistleblower and of the person to whom the wrongdoing is attributed or with whom that person is associated, and information traceable to it; and b) information about a trade secret.

6. Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who report whistleblowing concerns under this policy, even if they turn out to be mistaken.

Brunel 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) wrongdoing or irregularity will not affect your employment or career possibilities at Brunel. Brunel will not accept any harassment or retaliation by other persons within Brunel 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 Whistleblower Policy will be taken seriously. A report that is deliberately not made in good faith may lead to disciplinary actions.

7. Investigation and outcome

The action taken by us in response to a report of a whistleblowing concern under this policy will depend on the nature of the concern. Once you have raised a whistleblowing concern, you will receive an acknowledgement of receipt within seven days after receiving the report. We will carry out an initial assessment to determine the scope of any investigation, whether an investigation is appropriate, and the form that it should take. Some whistleblowing concerns may be resolved without the need for investigation.

If the investigation of a report is hampered by your anonymity, you will be requested to disclose your identity. This requires your explicit consent. If your identity will be disclosed, this is done only to the people who need this information in the context of the report of the suspected wrongdoing or irregularities.

We will inform you of the outcome of our assessment and, if applicable, the follow-up within three months after sending the acknowledgement of receipt. You may be asked to attend additional meetings in order to provide further information.

In some cases we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing or irregularities.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result.

Our appointed Supervisory Board shall receive information on each report of a whistleblowing concern and follow-up information on actions taken.

If the actual or suspected wrongdoing or irregularity pertains to the functioning of (a member of) the Board of Directors, staff can report this directly to the Chair of the Supervisory Board. In cases where (a member of) the Board of Directors is involved, the Supervisory Board has the option of initiating its own investigation into any sign of wrongdoing or irregularities and to coordinate this investigation.

8. If you are not satisfied

While we cannot always guarantee the outcome you are seeking, we are committed to deal with your whistleblowing concern fairly and in an appropriate way. If you are not happy with the way in which your whistleblowing concern has been handled, you may contact the Chair of the Supervisory Board.

9. Reporting whistleblowing concern externally

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any suspected wrongdoing or irregularity in the workplace. You may however always choose to (also) make a report externally to a competent authority. However, we encourage you to report whistleblowing concerns internally (first) as this enables us to handle reports of whistleblowing concerns adequately and without delay and address them directly at the source. You may always contact your manager or the Whistleblower Officer for guidance.

10. Responsibility for the success of this policy

The Board of Directors has overall responsibility for this policy. The Supervisory Board monitors the operation of this policy, appropriate and independent investigations into whistleblowing concerns, and (where relevant), an adequate follow-up of any recommendations for remedial actions. The Whistleblower Officer, in conjunction with the Board of Directors and the Supervisory Board review this policy from a legal and operational perspective periodically.

All staff is responsible for the success of this policy and should ensure that they use it to disclose any suspected wrongdoing or irregularities. Staff is invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Whistleblower Officer.

11. Deployment of the Whistleblower Policy

Our commitment to promoting transparency and ethical behaviour is driven from the top by our CEO, and our leaders are held accountable to promote a workplace culture where employees feel safe to report any concern. The roles and responsibilities of this policy are as set out in the previous chapter. Our objective is to maintain professional ethical standards across all Brunel businesses. Therefore, developing and implementing a tailored global whistleblowing policy is key to creating safe working environments and executing ethical business practices across all regions. The deployment of this policy shall be guided by the following principles:

- Manage policy compliance by ensuring processes and procedures in line with this policy are followed.
- Promote a constructive whistleblowing culture within regional businesses, ensuring that employees feel safe to report concerns without fear of retaliation.
- Conduct annual review of whistleblowing processes and determine effectiveness
- Based on annual reporting and priorities, define annual focus areas that align with the objectives of this policy.
- Develop internal and external communication to support policy deployment and ensure employees are aware of how to report concerns confidentially.

By following this deployment process, Brunel ensures compliance with its whistleblowing policy, protects the rights of whistleblowers, and aligns business operations with global and local regulations. Through review, targeted communication on the policy will further enable continuous improvement and a culture of transparency and accountability throughout the organization.

12. Contacts:

SpeakUp:

<https://brunel.speakup.report/brunel>

Web application:



Telephone service: Call one of the numbers listed on this webpage:
<https://brunelcorporate.sharepoint.com/sites/int-info-speakupline/SitePages/Phone.aspx>

Organisation code 106008

Connect: All relevant information about SpeakUp can be found on Connect (Brunel).

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