

# *General Code of Conduct*

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In the context of the BESIX Group overall governance, each BESIX Group company is first required to comply with the specific rules, codes and guidance as made applicable for any project or activity by the client, public or private, and by the local authorities involved with such project or activity in the country or region concerned.

BESIX Group aligns further its CSR self-regulation with the world standards of ISO 26000 and of Global Reporting Initiative (GRI), aiming the development of a bona fide CSR policy in accordance with the seven CSR disciplines traditionally referred to, these being accountability, transparency, ethical behavior, respect for stakeholder interests, respect for legislation, respect of international standards of conduct and respect for human rights.

This Code of Conduct regroups the CSR policy requirements accordingly and hereunder around Corporate Governance, Human Rights, Business Behavior and Human Resources.

The Code of Conduct shall constitute a framework that can be developed subsequently by each business unit and BESIX Group company with due consideration for the standards and impact analysis applicable to its activity and to the country where it operates.

Compliance with the Code of Conduct is monitored at BESIX Group level and the Code is applicable to each BESIX Group company. Sole deviations allowed upon BESIX Group formal release, could result from the specificities of the country or business sector concerned, subject to the condition that the company shall at all times be required to apply higher standards than the ones prevailing in such geographical or business Segment.

The BESIX Group values of excellence, co-creation, respect, passion and unity equally applied with the underlying principle of respect, and performance shall accordingly and continuously be monitored and assessed to effectively reach the highest sustainable and responsible standards.

BESIX Group further aims to contribute to the continuous alignment with the Universal Declaration of Human Rights, the Internal Framework Agreement on fair labour standards (IFA), the United Nations Global Compact Ten Principles and the 17 UN Sustainable Development Goals (SDGs), the ISO 9001 and 14001 standards, the OHSAS 18001 and VCA\*\* standards and with the guidance principles of ISO 26000.

Within its sphere of influence, BESIX Group endeavours to ensure that its suppliers, subcontractors, agents, joint ventures and other partners in its projects abide by the principles set out in the Group's Code of Conduct.

BESIX Group assumes accordingly its responsibilities towards the communities and environments in which it operates, towards its employees, business partners and the society in general.

BESIX Group shall at any time be authorized to control or audit the implementation of and compliance with this Code of Conduct, as an integral part of BESIX Group corporate social responsibility objectives and action plans.





## *Corporate Governance*

### **Compliance with Laws, Rules and Regulations**

Directors, executive officers and employees should comply with the law, rules and regulations applicable to each BESIX Group company or entity. BESIX Group complies with the legal requirements that apply in the countries where it does business.

### **Conflict of interest**

Directors, executive officers and employees must avoid situations where their own personal or financial interests conflict with those of BESIX Group. Any situation that involves or may reasonably be expected to involve a conflict of interest with BESIX Group should be shared and disclosed promptly and before any effective conflict of interest with the reporting line of the concerned director, executive officer or employee. In case of doubt, the BESIX Group Citizenship & Sustainability Officer can assist.

### **Accounting Practices**

All business transactions with clients must be fully and accurately recorded in each company's books and records, in accordance with the appropriate procedures. Falsification or misleading entries, unrecorded funds or assets or payments without the appropriate supporting documentation and approval are strictly prohibited. Project accounts should be complete, accurate and transparent. Invoices should be prepared in accordance with statutory requirements and commercial practice. Payments in cash or discounted payments should in no circumstances be accepted unless the payment is made in accordance with generally accepted principles of control.

### **Personal Information and Privacy**

BESIX Group considers personal employee information such as compensation, performance and development information, home address and home phone number as confidential and highly sensitive. Unauthorized

## *Corporate Governance*

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access, use or distribution of such information violates company policy and may violate legal requirements. BESIX Group strives to maintain a balance between business needs and personal rights, including employee safety and employee privacy.

### **Assets**

Directors, executive officers and employees have a responsibility to protect each BESIX Group company's property and resources, and ensure their efficient use. The activities involve the use of information, plant & equipment, tools, stocks of materials and office equipment etc. These assets must be used exclusively in connection with the business of BESIX Group. Any other use is prohibited. The same applies to confidential and proprietary information and/or rights. Employees should ensure that this kind of information or right is kept safe and secure and that it is used with care.

### **Confidential Information**

Directors, executive officers and employees should maintain the confidentiality of information entrusted to them by the company or its clients, partners or contractors except when disclosure is authorized or legally mandatory. In case of doubt on such legally required or authorized disclosure, the BESIX Group Citizenship & Sustainability Officer shall be consulted.

### **E-mail, Network, Internet Access and Software**

Except when expressly allowed within a BESIX Group company or entity, internal information systems, communication facilities and systems (including e-mail and voice mail), networks and databases are provided only for conducting BESIX Group's business. Those who access BESIX Group's e-mail, network and Internet systems are expected to do so responsibly and uphold company policies and standards of professional as well as personal courtesy and conduct. The Information Technology (ICT) department of the relevant BESIX Group company or entity must authorize all software used by employees to conduct business. The creation or use of unauthorized copies of any software for company business, whether in the office, at home or on business travel is strictly prohibited; specific authorization in writing is required for any employee to bring personally owned mobile devices to their workplace and to use those devices to access privileged BESIX Group company or entity's information and applications.

### **Dealing with internal knowledge**

All employees are required to ensure a swift, smooth exchange of information within the company. Apart from cases in which other interests take priority (e.g. confidentiality), information must be forwarded correctly and in full where needed. Information must be recorded correctly and reported to the BESIX Group company or entity.



## *Human Rights*

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### **Commitment to international standards**

BESIX Group commits to comply with the United Nations Universal Declaration of Human Rights, the International Framework Agreement on fair labour standards (IFA) and the Organisation for Economic Co-operation and Development (OCDE-OECD) rules and acknowledges its responsibility to observe those rights and rules that apply to BESIX Group performance toward BESIX Group' employees and the communities in which BESIX Group operates or where BESIX Group recruits its collaborators.

BESIX Group endeavours to comply with the Global compact principles of the Organisation for Economic Co-operation and Development (OCDE-OECD).

### **Social Dialogue**

BESIX Group promotes the social dialogue and communication with the workers and employees in each country where it operates pursuant to agreed communication and negotiation channels and operating methods as appropriate in such country.

### **Discrimination and Harassment**

BESIX Group strives to uphold a non-discriminative work and employment environment and prohibits harassment by any employee. Discrimination, harassment, slurs or jokes based on a person's race, colour, creed, religion, national origin, citizenship, age, sex, sexual orientation, marital status of physical disability, as well as other individual attributes or statuses that may be protected under local law, will not be tolerated. Physical, verbal or sexual intimidation will not be tolerated. Employees should take any complaints of this kind to the Chief People Officer or the BESIX Group Citizenship & Sustainability Officer.

In the context of continuous promotion of respect, BESIX Group has set up a network of Confidence Officers.



## *Business Behaviour*

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### **Consultants, Independent Contractors and Other Service Providers**

Relationships with third parties must always be proper, lawful and documented. Compensation and fees must always be set out in a written agreement and reflect the value of the service being provided.

### **Procurement**

BESIX Group expects its suppliers, subcontractors, joint venture partners and service providers not to betray the trust that BESIX Group places in them. All agreements should be strictly observed. Business partners have the right to expect the same of BESIX Group.

BESIX Group promotes and requires that buyers, suppliers, subcontractors and service providers comply with the BESIX Group Sustainable and Responsible Procurement Code of Conduct.

### **Bribery and corruption**

Directors, executive officers and employees are forbidden to offer or give, directly or indirectly, any undue payment or other consideration to any person or entity for the sole purpose of inducing such person or entity to act and obtain, retain or direct business or to secure any other improper advantage to a BESIX Group company or entity.

### **Fair Dealing**

Directors, executive officers and employees should endeavour to deal fairly with BESIX Group's clients, suppliers, competitors and employees. None should take advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

## *Business Behaviour*

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### **Free and Fair Competition**

Directors, executive officers and employees are committed to obey World and/or European and/or applicable national competition law, designed to encourage and protect free and fair competition.

### **Gifts**

Directors, executive officers and employees are forbidden to solicit or accept any undue payment or other consideration that is given for the sole purpose of inducing to act contrary to prescribed duties. Small business gifts are permissible exclusively as a token of appreciation and provided that the recipient is not placed under any obligation by accepting them. In case of doubt, the BESIX Group Citizenship & Sustainability Officer shall be consulted.

### **Local Requirements**

Because BESIX Group operates in many countries around the world that each have their own laws, BESIX Group may, and will apply this Code in the most appropriate way for the concerned area. Nothing in this Code is intended to cover conduct in a way that is inconsistent with local law.

### **Political Contributions**

BESIX Group encourages its employees to exercise their civil rights and responsibilities. However, political aspirations on the part of employees and the holding of offices outside the company, whether public or private, should not conflict with the law. BESIX Group' funds or assets may not be used for political donations, campaigns or political events under any circumstances.





## *Safety*

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Directors, executive officers and employees are required to observe BESIX Group' safety and health rules and practices, to report accidents, injuries and unsafe equipment, practices or conditions, and to exercise caution in all of their work activities. All BESIX Group' companies and employees are responsible for maintaining a safe and healthful work environment. Violence and threatening behaviour is not permitted and will result in disciplinary action.



## *Environment*

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BESIX Group is determined to make its contribution to the responsible development of the built environment. A sound environmental management policy forms an integral part of day-to-day operations. Its ambition is to continually improve the environmental credentials of its projects, products and services by actively looking for ways to reduce negative environmental impacts during their entire life cycle. It is expected of employees that they will not perform any actions running counter to this objective.





## *Human Resources*

### **Corporate opportunities**

Directors, executive officers and employees are prohibited from (a) taking for themselves personally opportunities that result from the use of corporate property, information or position and that would not serve the interests of BESIX Group, (b) using corporate property, information or position for personal gain, and (c) competing with the BESIX Group company or entity.

### **Drugs and Alcohol**

It is prohibited to possess, transfer, purchase, sell or use any illegal “controlled substance”, alcohol or drug at work or at company-sponsored events.

### **Outside Employment**

Directors, executive officers and employees may not engage in employment outside of BESIX Group, including self-employment, unless approved in advance by the management. Outside employment should not interfere with their performance or responsibilities to BESIX Group, and the use of any BESIX Group personnel or property for such purposes is prohibited.

### **Credit Cards**

Directors, executive officers and employees who are issued corporate credit cards are responsible for activity related to these credit cards, including purchases, payments, late fees and penalties. Unless local policy specifically provides otherwise, credit cards are to be used only for business-related expenses.



## *Code of Conduct Monitoring*

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### **Reporting Illegal Behaviour or Code Violations**

Directors, executive officers and employees should promote ethical behaviour and should encourage employees or staff to talk to supervisors, managers or other appropriate personnel when in doubt about the best course of action in a particular situation. Violation of laws, rules, regulations or this Code should be reported to the BESIX Group Citizenship & Sustainability Officer, without delay, stating all the known facts and circumstances. The report will be treated confidentially and the identity of the person making the report will not be disclosed, having due regard to the provisions of the compliance rules.

### **Disciplinary Actions**

This Code of Conduct provides binding and unequivocal rules for the way BESIX Group operates. It helps us conduct business in accordance with its values. The Group expects the employees of all BESIX Group' companies to act in accordance with its ethical principles, which the BESIX Group Citizenship & Sustainability Officer shall monitor continuously. BESIX Group expects and requires all executives of the BESIX Group companies and entities to live by and communicate these principles. BESIX Group or the concerned BESIX Group company or entity will take appropriate warning and/or corrective action against anyone whose conduct violates this Code of Conduct, which can termination of employment.

### **Updates**

Updates or other changes to this Code will be published from time to time online on the BESIX Group intranet and website, upon the initiative of the BESIX Group Citizenship & Sustainability Officer and after validation by the Executive Committee of BESIX Group.