

THIS IS HOW WE WORK

CODE OF CONDUCT

heijmans



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FOREWORD



Welcome to Heijmans, where together we are paving the way to a healthy living environment. What an amazing challenge! Everyone wants to breathe fresh air, live in a good neighbourhood and enjoy nature. Everyone wants to work in a good workplace, travel quickly and safely from A to B and return home safe and sound.

To achieve this, we are making our activities better, smarter and more sustainable. Not just sometimes, but every day. By doing so, we are taking on our responsibility for the future of both Heijmans and the Netherlands.

For Heijmans, a healthy living environment also means healthy and sustainable business operations. A safe working environment is the basic precondition. How do we achieve this?

Teamwork, caring for each other and transparency - that is what Heijmans stands for. This also means acting with integrity, willingness to take responsibility and consideration for others and the surrounding environment. That is our culture, that is how we treat each other and others. This is also in line with Heijmans' three core values: teamwork, ownership and result-orientation.

It is important for us that you enjoy going to work. The same goes for feeling safe and comfortable at work. Despite this, you may find yourself in awkward situations that go against your better judgement. Often, common sense will help you make the right decision. But sometimes you may be faced with uncomfortable choices. When dealing with dilemmas, it helps to have a reference point: what do we expect from each other and what do we absolutely not tolerate?

This Code of Conduct provides guidance and direction. Regarding our practices. Regarding good conduct. But also regarding compliance with laws and regulations. The Code of Conduct is not without obligation and applies to everyone who has dealings with Heijmans: the board, our (temporary) colleagues, but also our partners, subcontractors and suppliers.

Heijmans stands for an open culture, where you feel safe to discuss and report matters. This Code of Conduct will help you do just that. In this way, together we can ensure that our positive influence on the living environment continues to grow.

Ton Hillen,
chairman of the Executive Board



1

WE TREAT OTHERS **EQUALLY** AND WITH **RESPECT**

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We have been thinkers and doers for a century. Heijmans works at the centre of society, not at a distance from it. That is where we belong. That is where the changes take place, which we either trigger or contribute to.

Heijmans is a company with the opportunity to reshape the Netherlands every day and pave the way to healthy living environments. We have been doing so since 1923, often in partnership with others.

Have our social customs changed in a hundred years? Yes and no. We no longer doff our helmet or hat to a passing colleague. Nor do we type 'Good Sir' above an e-mail to a civil servant. But our principle has not changed: you treat others as you would like to be treated yourself. In other words: equally and with respect.

It is important to realise that we do not owe our success to knowledge, skill and experience alone. We owe it just as much to our enjoyable and courteous dealings with everyone we meet in our work. Colleagues, clients and subcontractors, but also local residents, interest groups and end users.

Each and every one of them deserves equality and respect. Anyone who does not accept this does not understand the spirit of Heijmans and is not one of us. A harsh conclusion? Yes, but above all a logical one. Because to create healthy living environments, you should start with a healthy corporate culture.

“When I saw that my new colleague was **forcing a laugh** at the jokes we were making, I said: 'Guys that's enough'.”

Firm ground

Heijmans needs land. And equally, land needs us. We drain, move, remediate and build on it. The law too, needs firm ground. Article 1 of our Constitution is crystal clear: discrimination is not allowed in the Netherlands, regardless of a person's opinion, political or religious beliefs, origin, age, gender or sexual orientation. Heijmans firmly agrees with this.

Offensive conduct

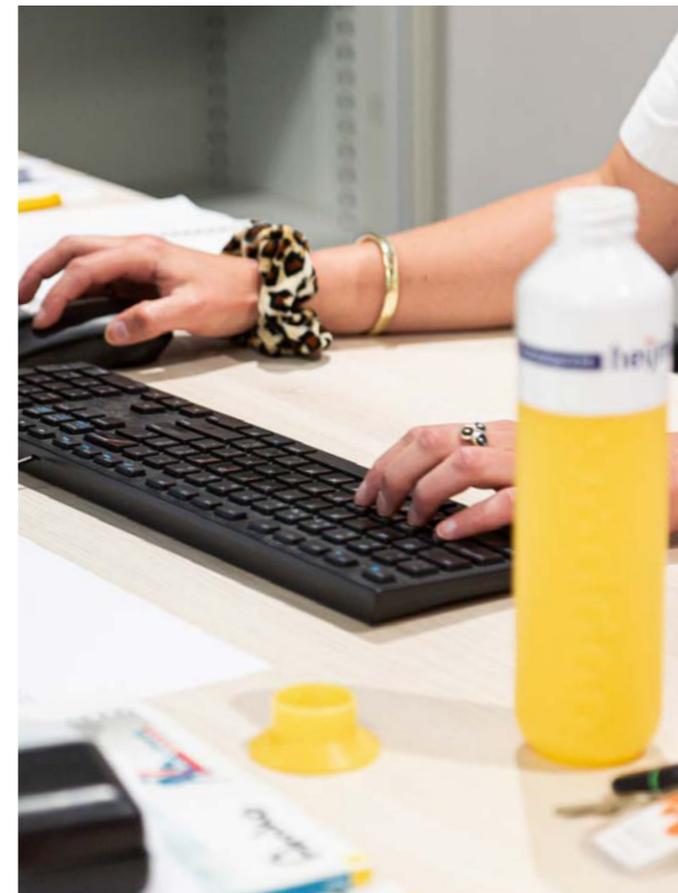
Boundaries are eroding. Boundaries between private and public. Between reality and fake. Between work and home. That gives more freedom, some say. Others say it brings business and social opportunities. But that is only part of the truth. Because eroded boundaries can also lead to misunderstandings and undesirable conduct.

We do not tolerate offensive conduct such as bullying, discrimination, sexual harassment, aggression and abuse of position. It's simple: this harms others and damages the name of Heijmans. People often call it a joke, but does everyone really think it's funny? Be mindful of this.

If you see this kind of conduct in your working environment talk to the person in question about it. And if you can't work it out together inform your manager. You can also raise the issue of offensive conduct with one of the confidential counsellors or the compliance officer at the head office who is responsible for dealing with this type of reports within Heijmans.

Whichever way you go, our motto is: don't turn a blind eye, take action. Why? Because every Heijmans colleague is entitled to a healthy and safe working environment. Good to remember: reporting is in keeping with the spirit of solidarity. If and when something happens to you, you can count on someone else to take action.

We can be brief about the boundary between what is yours and what is mine. If you take something that does not belong to you without permission, you commit theft. It goes without saying that Heijmans will take action then. Theft, after all, takes away trust as well as belongings.



“At first I thought I was the only one. Until I heard that other colleagues were also being approached inappropriately. **Fortunately, our reports were taken seriously and action was taken.**”

2

WE WORK **SAFELY** OR WE DON'T WORK



Heijmans is result-oriented. In fact, this is one of our core values. We aim to finish a job as quickly and as well as possible. But this may never be at the expense of safety.

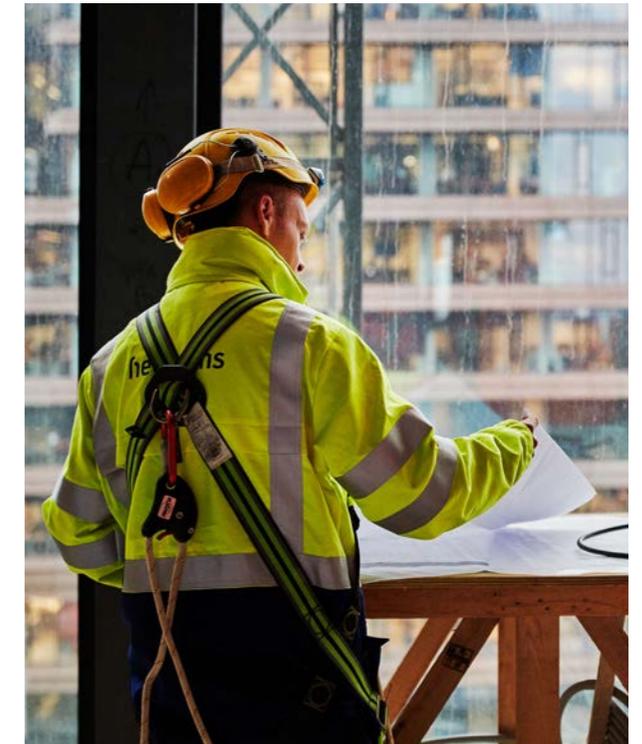
Creating a healthy living environment is only possible if there is also a safe working environment. Everyone who works at or for Heijmans plays an active role in this. Never mind what your job title or your working relationship is: we create safety together.

Safety at Heijmans starts with personal responsibility. For you, this means that you demonstrate conscious and active safety behaviour. To be clear: this goes far beyond wearing fall protection or a helmet and safety footwear. Safety is about looking out for each other and discussing this with each other. Every day, every hour, every minute.

Since 2013 Heijmans has been running the safety programme GO! That name stands for 'Geen Ongevallen', or Zero Accidents in English. That is more than just a wish. It is above all an order to everyone who works at or with Heijmans. How can you find the right safety course? By following the GO! Compass. This sets out our arrangements and your role. If your gut feeling is that something is unsafe, then speak up. If you notice

that safety is not being talked about invite others to join a discussion about this.

And if you see someone working unsafely, never turn a blind eye, but speak to them about it. By learning from each other, and from unsafe and safe situations, we can continue to make things better. In this way, you take responsibility not only for your own safety, but also for that of others.



Alcohol and drugs

Work can be fun, especially when it is going well. But the fun does not involve alcohol or drugs. This is only logical: safe and healthy work on the one hand and intoxicants on the other are definitely mutually exclusive. It is therefore agreed that you should always come to work sober. The use of alcohol and drugs is not permitted on Heijmans sites, either during or outside working hours. Very exceptionally, alcohol may be permitted, but only if a member of the Group Council has expressly approved it in writing. Additionally, you should always adhere to the legal regulations regarding the use of alcohol and drugs in traffic and always remember that you still have to get home safely. Another clear rule: in addition to alcohol and drugs, drivers of company vehicles are not allowed to take medicines that may affect their ability to drive.



3

WE ARE HONEST AND FAIR

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We are people. With knowledge, ambitions, strengths, idiosyncrasies and weaknesses. We work under one yellow Heijmans flag, but we are all different. In terms of age and level of education, in terms of culture and where we live. Yet we have a lot in common.

For example, we have an open, loyal and helpful attitude, which is in keeping with Heijmans' corporate DNA. And we work on the basis of trust. Mutually and in our contacts with others. We strongly believe in the power of teamwork. While we also make decisions based on business considerations. Furthermore: 'A man's word is his bond'. We do not only abide by laws and regulations, but also by agreements. This is fully in line with one of our core values: ownership.

Some topics that deserve extra attention:

Conflict of interests

Heijmans' character has brought us a long way. Teamwork is one of our core values. But the loyalty that is part of our corporate culture can unintentionally create awkward situations. On the one hand, we want to be collegial, and/or offer a helping hand to family and friends. On the other hand, it may create the appearance of a conflict of interests. We do not want this ambiguity.

So always contact your manager to discuss the situation. This also applies to any ancillary activities that are related to your work at Heijmans. These could also create the appearance of a conflict of interests.

Another thing: at Heijmans, everyone must be able to do their work in a professional and independent manner. Friendships, romantic relationships or family ties may get in the way at work. Always report this to your manager. We will seek a fitting solution together with the person(s) involved.

“We heard that employees were being given private perks in exchange for contracts. **This is a serious charge, which has been thoroughly investigated.** Firm measures have been taken against those involved.”



Corruption and bribery

We are honest and reliable. So corruption and bribery are totally out of the question. For the record: corruption involves all forms of abuse of power by a person in a position to wield power. Bribery is a form of corruption that aims to induce the person being bribed do something - or not do something - that will put the person doing the bribing in a better position.

Competition

Heijmans competes in a fair and open manner. We abide by the legal rules on competition, which are aimed at effective and fair competition in a free market.

We do not make price agreements and do not talk to competitors about prices or other matters that are competition-sensitive. We do not share business-sensitive information, for example about a tender, with competitors.

Fraud

The records we keep - for example, contracts and financial records such as mileage and working hours - are correct. We do not forge documents. Invoices are prepared in accordance with legal regulations and business practices and are correctly dated, complete and transparent.



Gifts

We do not accept any gifts, corporate gratuities or invitations that would jeopardise our independence. The same applies the other way round: we do not offer anything that could affect the independence of the recipient. Yet you do not have to be empty-handed if you want to express appreciation for a partnership. The offering of gifts or corporate gratuities is permitted in an appropriate form and after consultation with your manager. But again, only under the strict condition that it does not jeopardise your independence.

Sponsorship

Heijmans has a central position in society. National, regional, local. For this reason, we sponsor small and large events, always at the discretion of the management. We also occasionally make donations. However, we want to be careful about this. Sponsorships or donations can be seen as bribes, for example if someone receives a contract or other favour in return. If you suspect that a sponsorship or donation is related to a new contract, contact your manager.

“I have received two reports about old road signs and other metal that employees were selling to traders. That isn't just a question of old iron. That's theft.”

Sensitive information

Heijmans has a strong reputation. From ministries, municipalities and banks to corporations, universities and hospitals: clients, suppliers and subcontractors know what Heijmans has to offer. Proper handling of sensitive information enhances that reputation. Sensitive information includes information about finances, large tenders, innovations and Heijmans-specific developments. We therefore handle them with the utmost care. Three rules of thumb: be careful and attentive, always tidy up documents, never share passwords with others.

This vigilance has another reason: Heijmans is a listed company. Certain information can influence the price of Heijmans shares. This so-called price-sensitive information includes financial data (such as half-yearly and annual figures, monthly reports), major tenders and organisational changes. We never share this kind of information with others who do not need it for their job. If there is a good reason for sharing, and it is part of your job to do so, you should only share encrypted documents. Do this by e-mail and using a password.

Good to know: we always publish price-sensitive information, such as the annual and half-yearly figures and the award of a major project, via a press release. This is coordinated by the Executive Board and the Corporate Communication Department.

Insider knowledge

Insider knowledge is knowledge of non-public price-sensitive information, in this case about Heijmans, that could influence the trading price of shares or other securities of Heijmans if it were made public. The use of insider knowledge is prohibited by law. It carries heavy penalties.

The Heijmans Insider Knowledge Regulations set out the statutory rules that apply to all Heijmans employees, plus the rules that apply to a specific group of employees - the so-called insiders. If you have any questions about insider knowledge and the regulations, please contact Nicole Schaeffer, Company Secretary Heijmans: NSchaeffer@heijmans.nl.



Duty of confidentiality

Every employee is bound by a duty of confidentiality. This is also set out in your Employment Contract. In short: you do not provide any information about Heijmans to clients or other business relations if this could harm the interests of Heijmans.

Privacy

We respect the privacy of our employees, as well as that of our clients and other parties with whom we do business. Personal data is protected under the General Data Protection Regulation. This is set out in our [Privacy Policy, the Privacy Code of Conduct and the Privacy Statement.](#) →

Company property

To enable you to do your work for Heijmans effectively, Heijmans provides you with the necessary resources. This might be equipment or tools, but could also be a laptop, telephone or a company car. To avoid misunderstandings: company property is only used for business purposes unless (limited) private use is allowed, e.g. lease cars.

When using IT resources, we follow the [ICT Code of Conduct.](#) → We handle company property with care.

Social media

Are you proud or happy because of your work? If so, share it on LinkedIn, Facebook, Instagram, Twitter or other social media. However, we do expect you to do so wisely and responsibly. This is only logical, as you are a 'flag bearer' for Heijmans.

That is why we have some important rules: do not share information that could be harmful for Heijmans and always be respectful in your messages. If something or someone annoys you, talk to the person or authority concerned in person, not on social media. This prevents public quarrels.

If you share a photo of your job or project, check first that it does not contain any unsafe and/or confidential situations. And if you take a picture of someone, ask their permission first. Don't forget to check that the person is wearing the correct personal protective equipment (PPE) and is working safely. If you are uncertain or would like to know more, consult the [social media-handbook.](#) →

4

BETTER, SMARTER AND MORE SUSTAINABLE



With thousands of colleagues, we put our hearts and souls into creating a healthy living environment every day. We are proud of this, because our activities change the Netherlands visibly and often for the long term. This brings with it a heavy responsibility. We can and we want to bear this together. Our strategy helps with this. It rests on three pillars: better, smarter and more sustainable.

Better

We offer our employees good, safe working conditions and competitive terms and conditions of employment. Three concepts that we are keen to highlight: opportunities for personal growth, utilize everyone's capacities and equal opportunities. The challenges in our work are increasingly complex. They require knowledge of modern systems, methodologies and techniques. At Heijmans you get the opportunity for personal growth. This is how we keep the sector appealing to young people as well.

'Better' also includes our work processes and risk management. We do business fairly with all parties - from clients to suppliers and buyers. We collaborate not only on the basis of price, but also based on quality, professionalism and sustainability.

Another part of doing fair business is clarity regarding responsibilities, risks and other contractual matters. The three concepts anchored in concrete: honesty, trust and clear agreements.

Smarter

A folding ruler and digitisation are both indispensable in our work. The only difference being: a ruler has been a ruler for centuries, but digitisation does not stand still. It allows us, for example, to take a smarter approach to design, procurement and construction processes. This makes our work more efficient and safer. However, there are new rules: we want to handle the data (digital information) of clients, suppliers and subcontractors properly and securely. Smarter also goes hand in hand with good data security and privacy protection.

More sustainable

You can renew houses, buildings, roads and dykes forever. Not the earth - there is only one of it. With this growing awareness, we are mindful of our surrounding environment. We demonstrate this every day in our activities.



We go a step further than simply following environmental laws and regulations. We show our responsibility for the environment in a wider sense. Some examples: we follow the rules for waste separation, both on building sites and yards and in offices. We also avoid wasting energy, fuel and materials. We take initiatives to make what Heijmans builds completely circular.

procurement policy. We increasingly use sustainable transport, equipment, packaging and tools. In the open and fair selection procedure for suppliers, their social responsibility plays a role in our choices.

A sound financial basis and good returns increase our viability as a company. This is important to us, because we want to do right by our surrounding environment. But things are going further still. We want to add value to the living environment and leave a positive mark on the future of the Netherlands. This is all part of our policy to pave the way to a healthy living environment.

How to make a report

Together we make up Heijmans. Thousands of different people, with two things in common: we treat each other and others equally and with respect. If you suspect a colleague has committed an offence, it is important that you speak up and don't keep it to yourself.

You can do several things:

- Speak to your colleague. We strive for an open and safe culture, where we can call each other to account. If that is difficult, discuss observations, doubts, suspicions and difficult to solve dilemmas with your manager or the manager of the colleague in question first.
- If you can't or if you don't feel comfortable doing so, contact a confidential counsellor.

- You can also contact the Compliance officer Nicole Schaeffer, (NSchaeffer@heijmans.nl), who will deal with the report and may decide to **investigate** further (internally). →

If it is established that someone has violated the Code of Conduct, we will, after careful investigation, take measures appropriate to the violation. These range from a written warning to dismissal.

Good to know: managers, confidential counsellors and the compliance officer deal with reports in complete confidentiality.

If you would you prefer to report a (suspected) violation anonymously, you can do so via **SpeakUp**. →



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