



JAN DE NUL

MODERN SLAVERY STATEMENT

2024

Document control

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Reference documents

Reference	Title
JDN controlled documents	
JDN-POL-0004	Sustainability Policy
JDN-POL-0003	Code of Conduct
JDN-POL-0006	Supplier Code of Conduct
JDN-POL-0002	QHSSE Policy Statement
JDN-POL-0007	Sustainable Procurement Policy
Approval process ongoing	Due Diligence Policy
JDN-POL-0012	Policy for the protection of whistleblowers
JDN-POL-0018	Human Rights and Labour Policy – Own Workforce
JDN-POL-0019	Human Rights and Labour Policy – Value Chain

Definitions

Definition	Meaning
Counterparty	Any external company (or individual) that interacts or will interact with one of the Jan De Nul entities through a contractual or transactional relationship (e.g. vendors, clients and joint venture partners).
Vendor	Anyone who provides goods and/or services to Jan De Nul. 'e.g. suppliers and subcontractors.
Modern slavery	Modern Slavery is a term used to encapsulate child labour, slavery, servitude and forced or compulsory labour, human trafficking, forced marriage, debt bondage and deceptive recruiting for labour or services.
Slavery and servitude	Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/she did own the person, which deprives the victim of their freedom. Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

Forced or compulsory labour	Forced or compulsory labour is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.
Human trafficking	An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation.
Child labour	The term "child labour" is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Whether or not particular forms of "work" can be called "child labour" depends on the child's age, the type and hours of work performed, the conditions under which it is performed and the objectives pursued by individual countries.
Deceptive recruiting	Describes situations where the victim is deceived about exploitation through a type of modern slavery.
Debt bondage	Describes situations where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
Forced marriage	Describes situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.

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Purpose

This Modern Slavery Statement (hereinafter referred to as this “**Statement**”) describes the steps Jan De Nul has taken, in a range of areas, to deal with modern slavery risks in its value chain and own operations in conformity with the UK Modern Slavery Act and with the Commonwealth Modern Slavery Act 2018, covering the following period:

1 January 2024 to 31 December 2024

This Statement replaces any previous Modern Slavery Statements.

This Statement is made on behalf of Jan De Nul Group and all of its subsidiaries (hereinafter together referred to as “**Jan De Nul**”), and specifically Jan De Nul (Australia) Pty. Ltd., Jan De Nul UK Ltd, Jan De Nul Luxembourg SA and Jan De Nul NV.

This table outlines were each criterion in the Commonwealth Modern Slavery Act 2018 is mapped on the recommended and optional area's of the UK Modern Slavery Act and where they are addressed within this statement:

Commonwealth Modern Slavery Act 2018 criterion	Chapter in this Statement	Page number
Mandatory Criteria One and Two: Identify the reporting entity and describe its structure, operations and supply chains	Our business, organisation structure and value chain	4
Mandatory Criterion Three: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Risk assessment	7
Mandatory Criterion Four: Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Prevention, mitigation and remediation measures	7
Mandatory Criterion Five: Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Monitoring and effectiveness evaluation	10
Mandatory Criterion Six: Describe the process of consultation with any entities the reporting entity owns or controls	Organisation structure	5

1 Our commitment

We commit to respecting all internationally recognised human rights and applicable standards taking into account the interests of our stakeholders. We strive to prevent, cease and mitigate, or remedy, adverse impacts on human rights within our business operations around the world. We expect our counterparties (and the complete supply chain) to do the same.

At Jan De Nul, we have a zero-tolerance approach to modern slavery and are fully committed to preventing modern slavery in our operation and value chain.

The concrete steps to tackle modern slavery are outlined in this statement.

2 Our business, organisational structure and value chain

2.1 Business

With a team of more than 9,000 Can-Do people, Jan De Nul and its subsidiaries shape water, land and energy all over the world to improve the global quality of life for the next generations by tackling some of the greatest challenges of our time; from developing the world's most vital waterways to protecting our delicate shores, to carrying out ingenious construction projects and breathing new life into contaminated sites, as well as connecting national energy grids to building large-scale offshore wind farms.

Throughout the years, Jan De Nul established itself as a total solutions provider on a global scale. We are experts in **Offshore Energy** (offshore energy structures from concrete or steel foundations to offshore high-voltage substations and wind turbines, subsea cable installation, subsea rock installation and other seabed interventions), **Dredging Solutions** (waterway maintenance, deepening and widening, port future-proofing, land reclamation and coastline extension and reinforcement), **Construction Projects** (infrastructure works and building projects, including their foundations) and **Planet Redevelopment** (project development and site remediation).

This is a wide range of activities, but there is a common thread: projects with an ambitious scale, a level of complexity and precision that requires unrivalled engineering expertise, and high stakes. We can count on an industry-leading fleet and state-of-the-art infrastructure, but it is our own workforce of over 9,000 employees and non-employee workers that gets the job done. Engineers, construction workers, IT analysts, cooks, machine operators, captains and many more: they are the lifeblood of our company, whether they are active on our vessels, on our sites, or in our offices.

For many generations already, the De Nul family invests in people and in having its own equipment. We have a passion for business but also want to do things our way, which gives us a unique edge within the sector.

2.2 Organisational structure

Jan De Nul Group (Sofidra SA) has its head office in Luxemburg located at Parc d'Activités Capellen 34 - 36, 8308 Capellen (Luxembourg). Jan De Nul Group (Sofidra SA) is the parent company of multiple entities working around the world. Together they are referred to as "Jan De Nul". Jan De Nul continuously consults with all the other entities it owns and controls to be able to report in a consolidated way. This is via integrated teams covering the whole group, as well as via the Board of Directors of Sofidra SA being informed by the Sustainability Committee and the Compliance Committee. These committees are established to take up their roles for the group including all Jan De Nul entities.

2.3 Value chain

We establish a relationship of trust and integrity with all our vendors, which is built upon mutually beneficial factors.

In 2024, we purchased goods and services with 13252 direct vendors across 112 countries. Approximately 1% and 4% of our direct spend was respectively with Australian-based and UK-based vendors. Approximately 60% of the direct spend was with European vendors. Detailed mapping of the strategic and managed vendors revealed that most of the vendors are assigned to the following sub-industries:

1. Industrial Machinery & Goods
2. Engineering & Construction Services
3. Oil & Gas - Midstream.

Strategic vendors are vendors with an aggregate yearly spend of EUR 1 million or more, while managed vendors are vendors with an aggregate yearly spend of EUR 250.000 or more.

The Procurement Department manages procurement activities. This Department includes a dedicated colleague who leads our responsible sourcing approach (including in relation to modern slavery).

3 Due diligence processes

Jan De Nul conducts due diligence on its own operations and value chain, meaning it identifies and addresses adverse human rights and environmental impacts of its actions.

This due diligence is a process that is implemented in relation to various sustainability topics, which includes steps in relation to slavery and human trafficking in its business and value chain.

In the course of 2023 Jan De Nul started to incorporate this due diligence in a companywide and value chain Due Diligence Procedure. Jan De Nul's intention is to have this Due Diligence Procedure finalized in 2025.

Due to the specific conditions that are inherently linked to complex civil works, challenging maritime and environmental projects, and ground-breaking realisations in the offshore and renewable energy industry all over the world, Jan De Nul is creating its Due Diligence

Framework for conducting due diligence during its activities. This is not only to respond to the UK Modern Slavery Act and the Commonwealth Modern Slavery Act 2018, but also to evolving regulatory and stakeholder requirements and expectations.

The commitment of Jan De Nul is to conduct its projects whilst preventing and mitigating adverse impact in its own operations and its value chain. The goal of this framework is to avoid that the company operations and value chain of Jan De Nul contribute to human rights issues, modern slavery, unethical business practices or harm people, the environment or society.

Jan De Nul's Due Diligence Procedure follows the six building blocks of the OECD Due Diligence Framework and provides a backbone for meeting local and global due diligence obligations:

1. **Policy and management system:** our due diligence procedure is being embedded in a policy communicated internally and externally and will be part of our company wide corporate management system.
2. **Risk identification and assessment:** our abstract and concrete risk assessment allows us to identify and assess adverse impacts on the basis of internal and external data sources.
3. **Prevention, mitigation and remediation measures:** we prioritise and select relevant prevention and mitigation measures on the basis of our impact and leverage. We try to remedy if the negative impact does occur.
4. **Grievance mechanism:** we establish and communicate grievance mechanisms when and where relevant in the value chain. Our grievance mechanism is embedded in our risk assessment and prevention and mitigation measure procedure;
5. **Monitoring and effectiveness evaluation:** we monitor the effectiveness of actions taken by means of appropriate qualitative and quantitative indicators and include feedback received from both internal and external stakeholders, including affected stakeholders. The monitoring results are communicated across the company management.
6. **Documentation and reporting:** every step in our value chain due diligence process is documented and reported to both internal and external stakeholders. Our documentation procedure is also built to fulfil the audit requirements of sustainability reporting obligations, such as the European Union Corporate Sustainability Reporting Directive (CSRD).

3.1 Policy and management system in relation to modern slavery and child labour

Jan De Nul does not and will not tolerate any form of modern slavery, such as human trafficking, forced labour or slavery, neither within its own organisation nor in its value chain.

Similarly, Jan De Nul does not and will not tolerate child labour and will also take appropriate measures in case child abuse is suspected with one of our suppliers, subcontractors, partners or any counterparty we do business with.

Jan De Nul has developed a number of policies to ensure that we are conducting business in an ethical manner and with integrity in all our business relationships, such as the policies mentioned in the reference documents on page 1.

3.2 Risk Assessment

Strategic counterparties (e.g. clients and vendors) are assessed against abstract risk positions (country level and industry). To determine whether a location or business activity is identified as high-risk, countries and industries are screened in an abstract risk assessment against various criteria.

To be able to perform the abstract risk assessment on country level, we use a combination of internationally accepted tools.

In 2024 Jan De Nul assessed the following tools:

- Walk Free Global Slavery Index
- List of Goods Produced by Child Labor or Forced Labor | U.S. Department of Labor
- MVO Risico Checker
- ILO
- SPI (Social Progress Index)
- EPI (Environmental Performance Index)

After analysis of these tools, we decided to perform the abstract assessment via an accumulation of the results of the ILO (International Labour Association), SPI (Social Progress Index) and the EPI (Environmental Performance Index). This approach allows us to consider environmental, social, labour and governance issues a country can be dealing with.

Depending on the outcome of the abstract risk assessment, additional due diligence steps are required. Such steps may include:

- Additional detailed assessment;
- Sending out and analysis of the self-assessment questionnaire;
- Request for further mapping of the value chain;
- Contractual clauses to prevent and mitigate the negative impacts;
- Site visit and audit.

In 2024 potential Modern Slavery risks were identified in the tier N supply chain for the procurement of new workwear. Since this identification was part of the pre-qualification process for this new tender, timely action could be taken, and alternatives could be assessed.

3.3 Prevention, mitigation and remediation measures

3.3.1 Prevention, mitigation and remediation measures towards vendors

Prevention, mitigation and remediation measures are taken towards new vendors during on-boarding (pre-contract) and on existing vendors at regular intervals. These measures respond differently to the risks, based on whether Jan De Nul is causing, contributing to or directly linked to the risk. These measures may include:

- Comprehensive prequalification assessment in line with ISO standards
- Based on the outcome of the assessment and criticality of the supply / service, short listed companies could receive a compliance audit (before contract)
- Contract clauses on due diligence of tier N supply chain (e.g. tier 2 for the template Shipbuilding Contract)
- Intermediate scheduled and unannounced audits (follow-up audits) can be considered in the counterparties' premises, to ensure compliance with Jan De Nul requirements, applicable standards and local legislations.
- Check on adherence to our Supplier Code of Conduct including all underlying policies.
- Worker documentation verification: digital HR systems to track employee age and contract status, right to work etc. ensuring all workers meet legal employment and age requirements.
- Zero-Tolerance policy: any confirmed violations will lead to appropriate actions.

An e-learning module on Supplier Code of Conduct and on Modern Slavery for selected vendors in our value chain is already part of specific projects and is included in our medium term due diligence plan.

3.3.2 Prevention, mitigation and remediation measures towards own workforce - training

Prevention and mitigation measures are in place. This includes training.

In 2023 Jan De Nul personnel with functions at risk was trained on modern slavery, with the following objectives:

- Recognize the warning signs of modern slavery.
- Identify the risk of modern slavery within our industry and regions we work in.
- Ask questions to vendors and third-party agencies to help identify risks.
- Recognize drivers that may encourage modern slavery.
- Know where to report concerns of unethical or illegal behaviour.
- Make a commitment to preventing global modern slavery in our business.

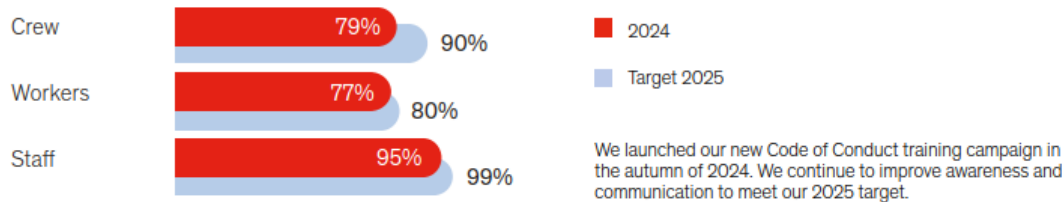
In 2024 this training was updated and will be embedded in the overarching due diligence training framework. This training is built upon the following chapters:

- What is modern slavery
- How common is modern slavery
- Why is the construction sector considered high risk of modern slavery
- Jan De Nul's commitment
- How to spot the signs?

Amongst our employees, we create awareness about ethical business practices through training sessions and campaigns. We are committed to ensuring that all employees follow the e-learning module of the Code of Conduct.

In autumn 2024, we launched, amongst other things, a new training campaign about our Code of Conduct. We are also moving towards mandatory refresher training to raise awareness about ethical conduct.

Number of colleagues who followed the new Code of Conduct training in 2024



Also, awareness has increased with the Jan De Nul purchasing team, especially since the onboarding of our Sustainability Procurement Officer at the beginning of 2024 who is part of the Procurement Excellence Team with a direct link with the Sustainability Team. The Sustainability Procurement Officer offers trainings to the Procurement Department on (European) sustainability legislation and is planning to offer trainings on Due Diligence.

3.3.3 Grievance mechanisms

Jan De Nul encourages everyone to report labour and human rights violations. This can be done in various ways. The existing grievance mechanisms at Jan De Nul include whistleblower policy, reporting mechanisms for issues such as sexual harassment, the MLC (Maritime Labour Convention) complaint procedure and health and safety incident and observation reporting system through our software system Intelix.

Jan De Nul is fully committed to carefully studying and resolving all reported complaints. We will not tolerate actions against an employee for filing a complaint.

3.3.3.1 Whistleblowing reporting system

Jan De Nul has a whistleblowing reporting system. In this reporting system everyone can report any suspected misconduct which could affect our company or people's wellbeing. Anonymous reporting is possible through this channel. All reports will be treated as strictly confidential. More information can be found publicly online: <https://www.jandenul.com/whistleblowing-reporting-system>

3.3.3.2 Confidential counsellors

Jan De Nul has internal confidential counsellors that offer psychosocial support in the event of problematic situations at work. The confidential counsellor informs, listens, advises and, if necessary, tries to facilitate conciliation (possibly via third parties). The confidential counsellor can be contacted with guaranteed confidentiality in the event of, amongst others, violence or aggression, verbal aggression, use of inappropriate language, psychological abuse, debasing treatment, consciously sabotaging colleagues, sexual intimidation, and stress. In addition, confidential counsellors can also be contacted at the external service MENSURA.

3.3.3.3 On-board complaint procedure

Our on-board complaint procedure applies to on-board complaints relating to any matter that is alleged to constitute a breach to seafarer's rights. This procedure is applicable to all vessels

of Jan De Nul. If deemed necessary by the complainant seafarer, he has the right to directly approach the Master or MLCComplaint@jandenul.com. Each person in the chain of command dealing with the grievance shall acknowledge receipt of the complaint to the complainant seafarer by signing the form and try to solve the matter in the shortest possible time. Complaints sent to the “MLC Complaint” service are treated discreetly and confidentially.

Seafarers have the right to file a complaint directly to an appropriate external authority, such as:

- a Flag Administration,
- a Port State Control official,
- a Local Seafarer Labour organization representative, or
- other Seafarer Welfare Assistance Service.

3.3.3.4 Incident Management Procedure

All incidents (accidents and near-misses) need to be reported through the Incident module in the Intelex mobile app or web application. The QHSSE incident management team monitors all reported incidents and provides support (e.g. incident investigation review). The complete investigation report of an accident shall be approved by the Project Manager, Area Manager of Fleet Manager depending on incident type. Once the incident is closed, the corrective actions are released and the status of the actions is monitored by the QHSSE Advisor.

3.3.4 Trade unions or other worker representative groups

Employees within Jan De Nul have the freedom of peaceful assembly and the freedom of association with others, including the right to form and join trade unions for the protection of their interests. All the necessary premises and equipment are made available to the consultative body, which meets on a regular basis. The Human Rights Policies describe the vision and expectations of Jan De Nul towards Human and Labour rights, among which 'Freedom of association and rights to collective bargaining'.

3.4 Monitoring and effectiveness evaluation

3.4.1 Engaging with others

We engage with various stakeholders to help monitor working conditions across our operations and value chain:

- For years we have had a multi-disciplinary company wide team “Stakeholder Engagement” that plans and implements regular engagement with different stakeholder groups;
- The following stakeholder groups were identified:
 - Nature;
 - Private clients;
 - Public clients;
 - Vendors;
 - Vendors' workers;

- Affected communities;
- Peers;
- Banks;
- Insurance companies;
- Jan De Nul workers;
- Jan De Nul supervisory bodies.
- In 2024 our Stakeholder Engagement Plan for the coming years was finalized.
- In 2024 our stakeholder sustainability questionnaire was launched to various external stakeholders.
- Also end 2024, a Sustainability, Safety and Wellbeing survey was established: all employees and non-employee workers of Jan De Nul could share their views and interests on different topics whereunder human rights. Currently the results are being processed.
- As part of the Due Diligence Procedures we will further develop tracking and measurement of the progress through engagement with the vendors, consultation of, and engagement with the other relevant stakeholders as well as other indicators. More specifically, it entails three activities:
 - Initial risk level and target risk level;
 - Efficiency test planning;
 - Residual risk level.

3.4.2 International Responsible Business Conduct Agreement

A broad coalition of solar and wind energy companies, industry associations, the Dutch government, knowledge institutions, NGOs and trade unions jointly committed themselves to making international value chains more sustainable via concrete Due Diligence engagements in the International Responsible Business Conduct Agreement. The Agreement aims to jointly tackle and prevent risks of human rights violations and environmental damage through cooperation. Jan De Nul entered into this Agreement beginning of 2024 and has as such engaged itself to implementing the 'OECD Guidelines for Multinational Enterprises' and the 'United Nations Guiding Principles on Business and Human Rights' (UNGPs) in its operations and throughout its supply chains. All the participants commit to specific actions to foster and monitor the actions of the companies. The multi-stakeholder collaboration aims to offer shared solutions in a shared sector with a global value chain to address problems that companies cannot solve entirely by themselves.

3.4.3 Social audits

Jan De Nul's working practices from the point of view of social responsibility are being part of occasional internal audits by our staff.

Any other (third party) audits will be further discussed and implemented within the course of the implementation of the new Due Diligence Procedure that is expected in 2026 at the latest, taking into account the already current application of parts of this procedure.

3.4.4 Monitoring of total hours worked by vulnerable groups

For some projects in Australia, we monitor – on a monthly basis – the total hours worked by vulnerable groups. Such monitoring is the basis for further identification and assessment of (potential) negative impacts.

Also, passport copies are requested, in order to flag any underaged people.

3.5 Reporting

Jan De Nul aims at communicating a plan on how all aspects of its Due Diligence Procedure are embedded in the business. It will do so internally and externally to all personnel, business partners and other relevant parties.