



Code of Conduct

TAUW Group

March 2024

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Vision, Mission and Core Values

Our Vision & Mission

A world in which nature and human activities co-exist in harmony requires environmental professionals with passion and expertise.

As a leading European environmental company, we create solutions that make sustainability tangible and feasible.

Our Core Values

The following core values are TAUW's fundamental beliefs:



Care

With passionate and competent employees, working in an open, diverse and participatory culture, we care for our clients, colleagues, society and the environment.



Connect

We firmly believe in the power of teamwork. We involve all stakeholders to realise a sustainable world for future generations.



Improve

We empower our colleagues and support our clients and partners to improve the quality of their services. We expand and share our knowledge and innovate to make sustainability tangible and feasible.



Why we have a Code of Conduct

Dear colleague,

Our vision and mission, combined with our core values 'Care, Connect and Improve', entail that the wellbeing of our environment, clients and employees is always at the centre of our attention. We believe in long-term relationships that are built on trust. That is why we exist for almost 100 years.

Our culture distinguishes the employees of our TAUW organisation from those of other organisations. To preserve our culture and to protect our employees and our reputation, it is very important that we know what is expected of each of us to ensure that we run an ethical and sustainable business with integrity and transparency.

This Code of Conduct explains our underlying norms, values and rules and provides guidelines on how to handle different situations, even though it cannot address every situation. Through the Code of Conduct, we want to ensure that you know what is expected in your behaviour and decisions and create a do-ask-speak up culture.

We are very proud of the legacy that we have created together. Thank you for your partnership and commitment. Let's make our Code of Conduct a breathing standard for our daily behaviour.

Henrike Branderhorst and Ralph van Roessel,
TAUW Group Board of Directors



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Scope and application



1 Scope and application

This Code of Conduct defines what is expected of TAUW employees regarding their behaviour and the decisions they make. We are committed to taking high ethical standards and sustainability into account in everything we do¹.

This Code of Conduct applies to all employees of TAUW Group and her 100% subsidiaries, including temporary workers, trainees and employees on secondment and all employees must comply with it. New employees will receive the Code of Conduct when they start working for us.

Depending on the situation and legislation in the different TAUW countries, there may be additional regulations for certain topics (for example regarding harassment and whistleblowing). It is the responsibility of local management to make their employees aware of these additional regulations.

The Code of Conduct is structured in such a way that a context is first outlined, after which a brief summary is given of what is expected of you in that context.

What is expected of you:

- **Do**

Familiarise yourself with the Code of Conduct and live by it. You are expected to know the principles and guidelines of the Code of Conduct and comply with them in your daily activities and decision-making. This is not limited to the 'what is expected of you' paraphrases.

- **Ask**

Seek guidance from your manager or other channels (see Chapter 6) if you feel uncertain about whether a situation and/or decision is legally or ethically acceptable.

- **Speak up**

If you have concerns about and/or notice a practice or behaviour that is not, or potentially not, in line with the Code of Conduct, you are expected to report this (see Chapter 6).

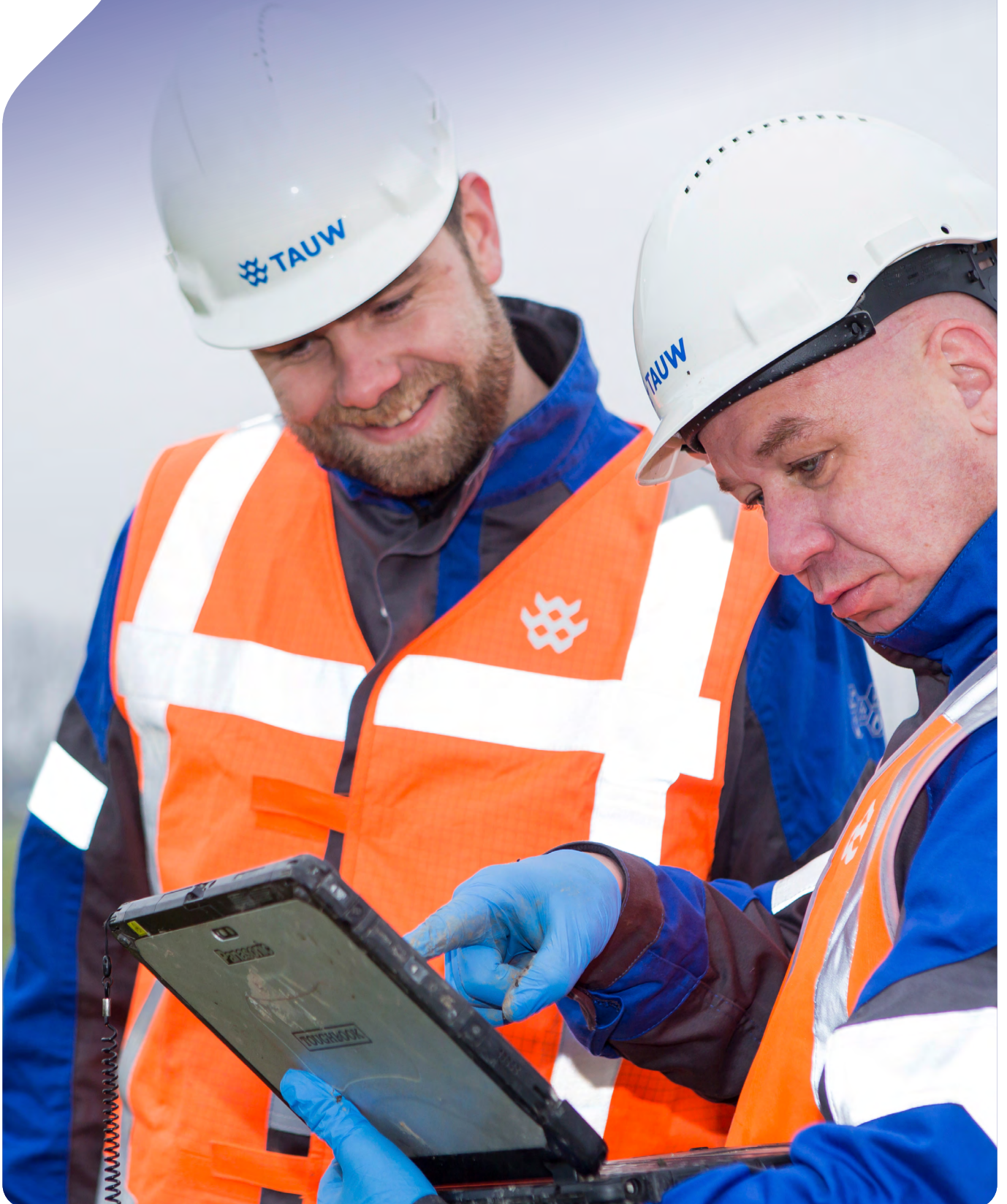
¹ As part of our Code of Conduct, TAUW Group endorses and requires her employees to adhere to:

- the International Federation of Consulting Engineers (FIDIC) Code of Ethics
- the UN Global Compact fundamental principles of human rights, labour, environment and anti-corruption



2

Care for people



2 Care for people



Diversity, inclusion and fair treatment

We believe that a collaboration between different kinds of people who can be themselves creates the most pleasant working environment and leads to the best outcomes for us and for our clients. We promote diversity and inclusion at all levels of the organisation and firmly commit ourselves to offering everyone fair treatment in all aspects of employment:

- We strive for interesting and satisfying jobs for everyone; people are empowered to develop their talents and are valued for their contribution.
- We recognise that each person has different talents and circumstances and we offer varying levels of support where possible, depending on individual needs.
- We select and promote employees based on their performance, experience and competences. We strive for a diverse workforce.
- We do not tolerate any form of discrimination, harassment or exclusion based on or because of gender, religion, age, national or ethnic origin, cultural background, social group, disability, sexual orientation, etc. (see also the Harassment statement below).
- We value dialogue and all employees have the right to express their views and concerns. Those will be treated in good faith, in accordance with this Code of Conduct.

What is expected of you:

- *Treat your colleagues fairly and with respect.*
-



Health, safety and wellbeing

Everyone has the right to work in a healthy, safe and fair working environment. We support, promote and maintain the safety, health and wellbeing of all employees through workplace practices and tools, encourage employees to take responsibility for their own safety, health and wellbeing and that of others and we provide our employees with internal policies and instructions regarding safety. Health and safety functions are established across the organisation.

Harassment

We strive for a healthy working environment that is free from harassment, intimidation and discrimination. Harassment includes creating an intimidating or hostile working environment and/or sexual harassment, such as in the form of unwelcome verbal, non-verbal or physical conduct. Harassment will not be tolerated. Employees facing harassment will be protected.

What is expected of you:

- *Comply with the TAUW Safety Policy & Rules.*
- *Always ensure that work is undertaken in a safe and healthy manner, for your own safety and for the safety of others around you.*





Respect for human rights

We respect the human rights of all people with whom we interact, including our employees, clients and other business partners. This applies to our own business and operations, but also to our sphere of influence. We do not accept or use any form of forced or compulsory labour or child labour.



Respect for privacy

We respect the privacy of our employees, business partners and other individuals. We only process personal data for appropriate purposes and in line with applicable laws and regulations. We provide our employees with internal policies and instructions regarding the processing of personal data.

What is expected of you:

- *Always treat personal data with care and in line with applicable laws, internal policies and instructions.*



3

Responsible business conduct



3 Responsible business conduct



Quality of our services and products

Our clients rely on the quality of the services and products that we provide for them. We offer our clients 'the best of TAUW', with an eye on professionalism and quality.

What is expected of you:

- *Keep your knowledge and experience up to date and follow all relevant developments.*
 - *Know your own limitations and know when to involve another colleague or third party.*
 - *Work in accordance with the agreed contract and the applicable rules, methods, laws and policies.*
 - *Act professionally, honestly and transparently.*
-



Impartial and independent acting

TAUW and her employees act independently and impartially in the performance of their work, based on facts and experience, and in accordance with the law, without any restrictions, inducements, pressures, improper influences, personal views, threats or interferences. This is further elaborated in the paragraphs below.

Avoiding conflicts of interest

Conflict of interest refers to a situation where someone serves multiple interests and these interests conflict with each other. Even the appearance of a conflict of interest may damage TAUW or our clients, or their reputation. A conflict of interest may also arise if it is not you, but your colleague, partner, family member, acquaintance or friend has an interest in the relevant decision.

What is expected of you:

- *Make every effort to avoid any conflict of interest related to your private life.*
- *Avoid situations in which conflicting interests of different clients are served, unless clients have stated that they do not object to this, you have taken appropriate measures and you have approval from your manager.*
- *If there might be a conflict of interest in a tender procedure, for example because there has been involvement in the preparation of or tendering for a project, discuss this with the potential client and make appropriate arrangements or refrain from tendering.*



Anti-corruption and anti-bribery

We commit ourselves to behaving professionally, fairly and with integrity in all our business dealings and relationships. We take a zero-tolerance approach towards bribery and corruption. We, therefore, do not offer or accept any advantage (for example gifts, money or special terms) to achieve benefits for TAUW, yourself or others without a proper legal basis. The consequences of acting contrary to anti-bribery and anti-corruption are serious and may include fines, debarment from tenders, imprisonment for individuals and may damage TAUW's reputation.

What is expected of you:

- *You must not promise, offer, grant or authorise the giving or acceptance of money or anything else of value to obtain or retain any personal or business advantage.*
- *Ensure that the nature of all transactions is transparent.*

Gifts and hospitality

As a gesture of good understanding, small occasional business gifts are permitted, subject to the condition that it cannot be considered a bribe and it does not affect TAUW's independence.

What is expected of you:

- *Do not offer or accept gifts and/or hospitality that could affect the independence and integrity, or the perception thereof, of TAUW or the other party/person.*
- *Do not accept gifts with an actual or estimated value of more than 50 euros without your manager's permission and do not accept gifts that are given on a non-occasional basis.*
- *Do not accept invitations for non-business activities from relations before you receive your manager's permission.*

Sponsoring and contributions

Company sponsorships and donations are ways to contribute to worthy causes and are part of our commitment to society. Unfortunately, even legitimate sponsorships and donations sometimes pose the risk of creating the appearance of bribery and corruption and/or conflict of interest. Therefore, we always carefully consider company sponsorships and donations. We refrain from sponsoring organisations or making contributions to charities if doing so could be seen as an act to influence someone's decision in gaining benefits for TAUW.

What is expected of you:

- *Obtain prior approval from the Board of Directors before making donations or closing sponsorship deals.*
- *Approved donations and sponsorships must be made transparently and be recorded accurately.*

Neutrality towards politics

TAUW adopts a neutral position with regard to the political process of any country in which we operate. TAUW's employees may participate as individuals in political life in their own time but they must not bring politics into the workplace. We will make a clear distinction between personal political opinions on the one hand and the views of TAUW on the other hand and ensure that TAUW is not involved or perceived to be involved in personal matters.

What is expected of you:

- *Keep your personal political activities and opinions clearly separated from your work.*





Fair competition

We value open and fair competition in compliance with all applicable antitrust and competition laws. Antitrust and competition laws prohibit business practices that prevent, falsify or reduce competition. We do not exchange sensitive business information with our competitors with the aim of or which may have the effect of restricting competition in the market and are cautious in our relations with them. In addition, in the event that we have a dominant position in the market, for example if TAUW is the only one who can provide a service, we will not abuse it.

What is expected of you:

- *Do not exchange non-public sensitive information with competitors.*
- *Do not abuse TAUW's dominant position in the market, for example if TAUW is the only party that can provide a service.*



Sanctions legislation

Sanctions are political instruments in the foreign and security policy of the United Nations, the European Union and national governments. They are coercive instruments that are used in response to violations of internal law or human rights or to change policy when legal or democratic principles are not respected. We avoid business activities, operations and client relationships that we know or suspect may lead to a violation of sanctions legislation, that are included on an official sanctions list, reside in or operate out of a sanctioned country or location, or that circumvent an applicable sanctions law or the spirit thereof. A complete overview of UN and EU sanctions can be found by clicking on the following links [United Nations Security Council](#) | and [EU Sanctions Map](#).

What is expected of you:

- *Find out background information about our potential business partners.*
- *Verify that no sanctions have been imposed regarding the country, locations or potential business relationship.*



Compliance with laws

TAUW believes that important norms and values are established in laws and regulations and will comply with all applicable laws and regulations. Violations of the law may cause major damage to TAUW and her employees, as well as to our business partners. This includes, for example, fines, exclusions, jeopardizing our good reputation and it may also have consequences in terms of labour and penalty laws.

What is expected of you:

- *Familiarise yourself with and comply with applicable relevant laws and regulations. Some of the laws and regulations that are relevant to TAUW and its employees are incorporated into this Code of Conduct and other internal policies and instructions.*



4

Sustainable business



4 Sustainable business



Business development and operations

We are committed to contributing to the sustainable development of society through our business activities towards our clients and in our own operations. In both, we aim to develop responsible solutions that improve the living environment while striving to avoid adverse impacts, whether we work for private or public clients. Making the world a better place is an important driver for working at TAUW and for the choices that we make.

Assignments for clients

We inspire our clients in sustainable development and guide and support them on their journeys. We aim to go beyond legislation and drive tangible sustainability impact into all TAUW projects.

Should a client infringe on our values or principles, we will reconsider our relationship.

Own operations

We strive to reduce the environmental impact of our own operations. At TAUW, we minimise our emissions and consumption of energy and natural resources and actively contribute to protecting the environment.

We expect our contractors, subcontractors and suppliers to adhere to the values and principles as stated in this Code of Conduct. If they do not meet these values or principles, we will reconsider our relationship.

What is expected of you:

- *Actively promote sustainable solutions in your work for clients and make sure not to harm other sustainability domains.*
- *Consider the environment in your daily job, consider environmentally friendly means of travel and utilise digital communication when possible.*
- *When working at client premises, always ensure to act as a role model. For example, during fieldwork avoid littering and other adverse environmental impacts and take away your waste.*





Reporting of financial and non-financial information

We are committed to transparency and accuracy in all our dealings. This includes reporting of financial and non-financial information in compliance with legal and regulatory obligations and standards. Our accounting records must describe all transactions in a manner that is correct and not misleading. TAUW complies with the international standards for tax planning transparency in its operations.

What is expected of you:

- *Ensure that data and information you submit in our books and records is accurate, complete and reliable. This includes both financial and non-financial information.*



5

Safeguarding TAUW's assets



5 Safeguarding TAUW's assets



Confidential information

We treat confidential information with due care so that it is not disclosed to unauthorised persons, and only use it for the purpose(s) for which it was provided. Confidential information includes not only TAUW's information but also any information that concerns TAUW's business partners, including clients and suppliers, and their business matters and also includes personal data. In addition, when taking up work with TAUW, all employees and subcontractors must agree to confidentiality, for example by signing an employment or a non-disclosure agreement. This applies both during the term of the employment contract and afterwards.

What is expected of you:

- *Keep all information obtained as part of your work at TAUW and that you know, or should reasonably be expected to know, to be confidential, secret.*
- *Information should be used only for the purpose(s) for which it was provided.*
- *When disclosing client-related and/or supplier-related information to colleagues within TAUW Group, it should only be on a need-to-know basis.*



Information security

We protect information assets from our clients and other business relations' as well as our own by means of our information security management system, certified under ISO 27001. Various policies have been written and shared with our employees, explaining to employees how they can contribute to information security. Furthermore, we have measures in place to protect our mobile phones, computers and computer system against unauthorised access or attacks.

What is expected of you:

- *Familiarise yourself with instructions and policies regarding information and IT system security.*





External communication

We are open, honest and responsive when dealing with external parties, including the media. We realise that the way we are perceived as a company is greatly influenced by the way we communicate. All communications with the media must be coordinated and approved by the Marketing & Communications department.

What is expected of you:

- *Approach the designated Marketing & Communication spokesperson within your entity in the event of communication with the media.*
- *When participating in social media concerning TAUW business or topics, always keep TAUW's reputation in mind.*
- *In your social media posts, stay far away from defamatory or harassing comments.*



The use of TAUW's assets and those of her business partners

We respect and care for TAUW's assets and those of her business partners, to ensure that we avoid loss, theft or damage.

Company assets are intended for business purposes. It is not allowed to store data that is not relevant to TAUW (such as holiday photos, private email etc.) in TAUW IT systems and on TAUW IT devices. However, outside this scope, limited private use of TAUW's electronic devices is allowed, but only as long as it is not in conflict with TAUW's interest, this Code of Conduct or our policies and instructions. Company assets are to be returned when leaving the company.

What is expected of you:

- *Always take due care and follow the instructions issued by TAUW and her business partners when using company assets to prevent damage, loss or theft of company assets.*
- *Do not store data that is not relevant to TAUW (such as holiday photos, private email etc.) in the TAUW IT systems and on TAUW IT devices.*



6

Compliance with the Code of Conduct



6 Compliance with the Code of Conduct



Ethical decision-making and Ethical Compass

In your work for TAUW, you may face difficult situations or decisions with no obvious right or wrong choices. Take enough time for these issues. You can use the following questions to guide you:

- Is it in line with TAUW's core values and the Code of Conduct and the principles reflected in it?
- Is it legal?
- Does it feel acceptable?
- Would I feel comfortable explaining my decision to my manager, the CEO or in an investigation?
- Would it be fine with me and with TAUW if it became publicly known?
- Would it be okay if everybody did it?

If your answer to one or more of these questions is 'no' and you are not sure if you need to report it, reach out to your colleagues and/or manager. If applicable, report a misconduct or potential misconduct in accordance with the 'Reporting and investigating misconduct' procedure described below.

For complex and business important dilemmas (ie. conflicting interests) with major impact, we use the Ethical Compass, in which dilemmas are assessed from different perspectives. This process ensures an equal and open exchange of different point of views and the outcome leads to a well-founded decision.





Reporting and investigating misconduct

If you suspect or observe that a conduct related to TAUW or its projects is illegal or not in line with our values and our principles as expressed in our Code of Conduct, you must report this internally. This gives us the opportunity to prevent and/or remedy the misconduct. A person making a report in good faith will not be at risk of losing their job or suffering any form of sanctions or personal disadvantages as a result.

Reported suspicions are thoroughly investigated. If the violation of this Code of Conduct, as well as any other violation of law or company policy, is confirmed by further investigation, this will lead to appropriate disciplinary action tailored to the specific violation, which may include termination of employment and claims for compensation by TAUW or third parties. If violating this Code of Conduct also constitutes a criminal offence, such violation may also result in criminal proceedings.

What is expected of you:

- *If you feel unsure about the ethical aspects of your decision, do not hesitate to look for guidance from your manager.*
- *Actual and potential violations must be reported immediately. Use the following channels:*
 - > *your line manager*
 - > *your HR manager*
 - > *executive management (Board of Directors, country directors, BU management)*
 - > *the compliance officer*

Go to the channel that you think is most appropriate.

- *If you are of the opinion that someone is not responding adequately or if the report concerns the conduct of the person in question, turn to executive management or the compliance officer (complianceofficer@tauw.com). All contact with the compliance officer will be treated confidentially and anonymously at your request.*

Regarding some topics (whistleblowing and harassment), there may be local regulations in the different countries with separate reporting channels. You can ask your local HR manager or the compliance officer about this.



Management

Line managers have a specific role in relation to the Code of Conduct. Managers promote the Code of Conduct and require everyone in their organisation to adhere to the Code of Conduct. They act as an example themselves, in line with the Code of Conduct, and they create an open and inclusive environment where employees feel comfortable to 'speak up' and discuss ethical issues together and with management. If managers become aware of any misconduct, they will intervene and/or escalate it directly to the appropriate level of the organisation.





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