

# WHISTLEBLOWING POLICY

## SUMMARY

The core values of DEME Group nv, its subsidiaries, branches or affiliated entities (“DEME”) guide our way of working with each other, with business partners and with communities. In accordance with [DEME's Code of Ethics and Business Integrity](#) (our ‘Code’), business shall always be conducted with respect, integrity and in compliance with all applicable laws and regulations including DEME’s own policies and procedures.

At DEME, we believe that the possibility to raise integrity concerns without fear of reprisal is an effective way to detect potential or suspected infringements and violations of our Code, our policies & procedures and laws and regulations in general, that may otherwise go undetected and remain unremediated.

With this document, DEME provides a summary of its Whistleblowing Policy. The full Whistleblowing Policy is available to our personnel via the DEME Navigator. To external parties the full policy will be made available upon receiving a reported issue or on their first substantiated request.

### 1. Who can report?

This procedure is applicable worldwide to DEME Personnel<sup>1</sup>, DEME’s business partners as well as any other third party concerned, who acquired information on breaches in a work-related context (the “Reporting Individual”).

### 2. What can you report?

A Reporting Individual may report allegations of past, current, future or suspected material misconduct<sup>2</sup> that may adversely impact DEME, DEME’s customers, shareholders, Personnel, investors or the public at large.

### 3. How do you report?

Any integrity concern may be communicated:

- by e-mail: [compliance-reporting@deme-group.com](mailto:compliance-reporting@deme-group.com);
- by regular mail: Attn. Chief Compliance Officer, Scheldedijk 30, 2070 Zwijndrecht, Belgium.  
Please mark the envelope as “Confidential”.

Many jurisdictions also offer external whistleblowing channels. However, we strongly encourage a Reporting Individual to report through DEME’s internal reporting channels first as this allows DEME to address the concern effectively and take immediate, remedial action where applicable.

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<sup>1</sup> All DEME directors, company representatives, staff, full and part-time employees (permanent and temporary), whether working under a contract or on a freelance basis (personnel) for DEME and all its subsidiaries.

<sup>2</sup> For this policy, material misconduct includes (i) fraud, mismanagement, corruption or other crimes, (ii) breaches of any laws, regulations or DEME’s policies & procedures and (iii) any other serious risk, wrongdoing or unlawful conduct that threatens any member of personnel, customers, the public, DEME or DEME’s reputation. It does not include e.g. individual employment matters and/or questions on our Code or other ethics issues. If you are uncertain whether a matter is within the scope of this policy, you can seek guidance from DEME’s Compliance Department.



Reports may be filed on a disclosed or anonymous basis. However, Reporting Individuals are strongly recommended to self-identify as anonymous reporting (i) will prevent us from informing the on the progress and closure of the file, (ii) makes proper investigation difficult (if not impossible) and (iii) prevents DEME from protecting the Reporting Individual against potential retaliation.

For these reasons, DEME reserves the right to decline the investigation of any anonymous report that does not contain enough factual elements to allow us to investigate the report with proper care and diligence.

#### **4. Investigation and outcome<sup>3</sup>**

1. After ascertaining the nature of the reported or suspected concern, an acknowledgement of receipt will be sent to any Reporting Individual that has disclosed its identity, within a timeframe of 7 calendar days.
2. Upon reasonable concern, a preliminary investigative process may be conducted by DEME's Compliance Department. These investigations will be carried out objectively, confidentially and without regard to any person's relationship to the organization, position or length of service. Following this preliminary investigation, the Compliance Department will notify the Reporting Committee members as soon as possible and they shall discuss the further measures to be adopted, if any, on the reports received.
3. A Reporting Individual will be informed within a timeframe of 3 months following the acknowledgment of receipt, of the conclusions reached by the Reporting Committee and on any actions envisaged or taken as follow-up and on the grounds for such follow-up.

DEME will seek to protect its reputation and recover its assets through all legal means available, which may include handing over the investigation to the police, or other authorities if so required. All decisions to refer the examination results to the appropriate law enforcement and/or regulatory agencies for independent investigation are be made by the Reporting Committee.

#### **5. Reporting in good faith**

DEME strictly prohibits any retaliation, directly or indirectly, for reporting in good faith under the Whistleblowing Policy. Reporting in good faith implies that the Reporting Individual should have reasonable grounds to believe, considering the circumstances and the information available to them at the time of reporting, that the matters reported are true.

However, all possible measures are taken to avoid people becoming victims of false accusations. Reports made in bad faith, false, maliciously, frivolously, recklessly or with a view to personal gain, may cause disciplinary action. In addition, this policy shall not prevent DEME from taking employment-related decisions which are not related to the reporting.

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<sup>3</sup> DEME reserves the right to deviate from the extent of the protection that is offered and the procedure(s) as they are described in this Whistleblowing Policy for all matters not within the scope of EU Directive 2019/1937 and its transposition in the relevant national legislation.