

VolkerWessels Trust Line

(formerly referred to as Whistleblower scheme)

Royal Volker Wessels Stevin NV (VolkerWessels) is committed to creating a culture of openness, responsibility and integrity, within which all employees, regardless of their position, can report Suspected Wrongdoing at VolkerWessels in confidence.

Purpose of the scheme

The objective of this scheme is:

- to promote and support a culture of openness, responsibility and integrity;
- to offer employees a channel to address issues that they are concerned about;
- To provide employees a work environment where they feel safe, protected and at ease;
- to protect the reputation of VolkerWessels;
- to be aware of possible wrongdoing at an early stage and to have the opportunity to resolve the wrongdoing internally.



Reporting structure

If you wish to report a Suspected Wrongdoing, we encourage you to address this in person with the colleague in question. If this is not possible, please notify your direct superior or the Compliance Officer within your organisation, before resorting to the use of the external Trust Line. The Trust Line is intended as a last resort, in situations where there are no other options anymore for reporting the Suspected Wrongdoing or if you want to remain completely anonymous.



Step 1:

Addressing the issue directly with the colleague in question



Step 2:

Direct superior



Step 3:

Compliance Officer



Step 4:

External Trust Line (last resort)

Trust Line Scheme


VolkerWessels

Reporting procedure through the Trust Line

The Trust Line is not a replacement of existing procedures for dealing with (individual) complaints or grievances.

The Trust Line is managed by an external service provider, called People Intouch. The Trust Line is a free and confidential phone and e-mail service, offering employees at VolkerWessels the opportunity to report their concerns regarding Suspected Wrongdoing.

The Trust Line is manned **24 hours a day and 365 days a year**.

As the Reporter, you are given the opportunity to disclose your identity, but this is not required. Nevertheless, if you want to be 100% sure about your anonymity, we advise you not to use the e-mail service from a company computer or calling the phone service from your business phone.

You can use the Trust Line in 2 ways:

1. Through the e-mail service, where you are asked to complete a report through a secure website: (www.speakupfeedback.eu/web/4wawru/ca);
2. Through the phone service, where you are connected to a voicemail system where you can leave a message: **0800 – 0222931**.



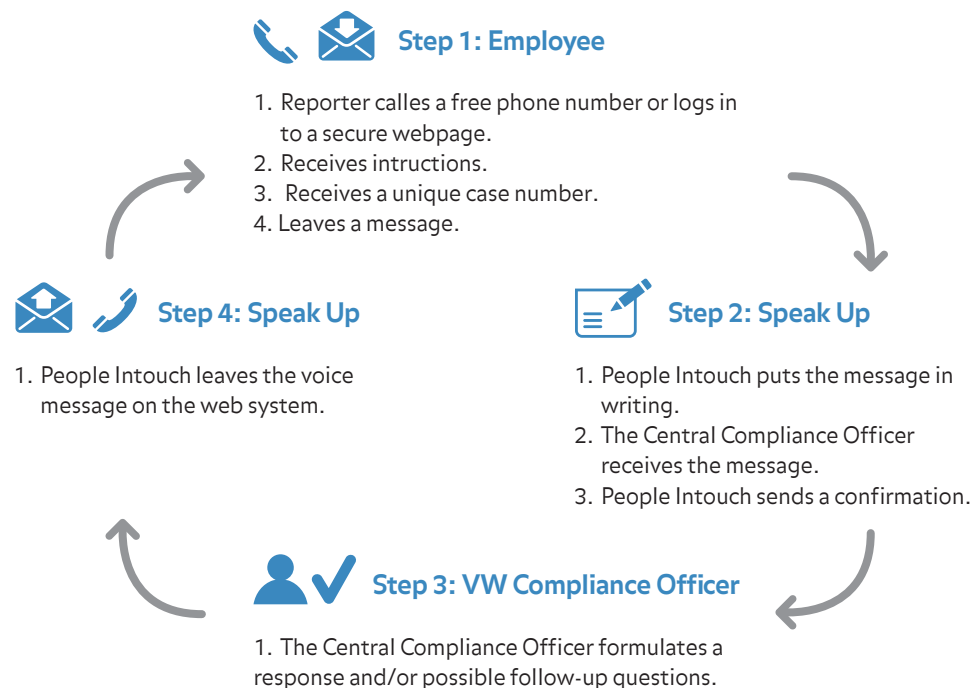
For both the e-mail service and the phone service, you need the following general VolkerWessels access code: **07681**.

You are given a unique personal file number, which you can use to log back in or call back to read or listen to a reply or a request for further information.

Leaving a message

Please provide as much information as is required to enable the Central Compliance Officer to assess the issue properly, such as

When you use the Trust Line, the procedure is as follows:



background, history and the reason for the concern, as well as names, dates, places and other information.

As a Reporter, you are not expected to prove that an allegation is true, but you must be able to demonstrate that there are sufficient grounds to reasonably assume that something is wrong and provide sufficient facts, names and data to allow the desired investigation into the reported Suspected Wrongdoing to be carried out.

Confidentiality

The Central Compliance Officer will treat all reports of Suspected Wrongdoing and

all information received from the Reporter in that context as strictly confidential. The privacy of both you, as the Reporter, and the accused is protected.

Preventing punishment or reprisals

VolkerWessels does not tolerate any form of punishment, retribution or reprisal against you when you report a Suspected Wrongdoing in good faith, even if you are mistaken and/or when the facts later turn out to be incorrect and/or do not lead to further measures. Every employee who reports Suspected Wrongdoing will be protected and will in no way be disadvantaged as a result of their report.