

POLICY

Human Rights Policy

Document No: RHDHV-GL-I-IC-POL-0011

Page 1 OF 8

OPEN

00	23-Oct-2023	Approved for Use	C. NOORDHOF	M. KOKKE	M. SCHAAP	M. HULSHOF
REV	DATE	ISSUE DESCRIPTION	AUTHOR	CHECKER	QHSE	APPROVER

This document and its attachments, as well as the information contained therein, are confidential and contain Royal HaskoningDHV intellectual property or the intellectual property of Royal HaskoningDHV subsidiaries, affiliates and/or related companies.



TABLE OF CONTENTS

1.0	INTRODUCTION.....	3
1.1	 Purpose.....	3
1.2	 Scope	3
1.3	 Responsibility.....	3
2.0	WHAT ARE HUMAN RIGHTS?	3
3.0	COMMITMENT.....	4
4.0	KEY HUMAN RIGHTS PRIORITIES.....	4
5.0	IMPLEMENTATION	5
6.0	DEFINITIONS.....	6
7.0	ABBREVIATIONS.....	7
8.0	REFERENCE DOCUMENTS	7
9.0	CODES AND STANDARDS	7
10.0	REVISION HISTORY	7
11.0	RECORDS	8
12.0	DOCUMENT RACI.....	8

1.0 INTRODUCTION

Integrity and ethics are at the core of Royal HaskoningDHV. We are guided by various international principles and standards, legislation, our [Code of Conduct](#) and internal policies. These standards are an integral part of our Compliance Integrity Management System (CIMS), which is part of our Integrated Management System, and we aim to meet, or where possible surpass, current best practice.

1.1 Purpose

Royal HaskoningDHV operates in a variety of cultural, social and business contexts. This means that we may operate in countries or in industries where human rights may not always be respected. Enhancing Society Together is our company's purpose, meaning we care deeply about our employees, our clients, and society at large, and one of our five key themes within this purpose is social value and equality. To deliver on our purpose, we recognise that upholding human rights is intrinsic. Our commitment to respect human rights is not only integral to the way we work but also extends to our business relationships. Reaffirming our dedication to upholding human rights, Royal HaskoningDHV has been a proud signatory of the United Nations Global Compact since 2008, where we adhere to its Ten Principles. This policy confirms our commitment to respecting human rights and honouring the principles of our [Code of Conduct](#).

1.2 Scope

This policy applies to all employees including the flexible workforce of Koninklijke HaskoningDHV Groep B.V. and its group- and non-group companies and extends to our projects, services and solutions. We actively encourage our business partners to uphold the principles outlined in this policy and to adopt similar policies and practices within their businesses. All employees have access to this procedure via Insight or via the Local Compliance Officer (LCO). Our human rights policy is also made publicly available on our website. If you have any questions about this policy, please contact your LCO or e-mail compliance@rhdhv.com.

1.3 Responsibility

The compliance department is responsible for ensuring this policy is issued and being communicated to all employees of Royal HaskoningDHV.

Employees have the responsibility to comply with this policy.

Line management has the responsibility to ensure that their employees are aware and comply with this policy.

2.0 WHAT ARE HUMAN RIGHTS?

Humans have rights because we exist as human beings – they are not granted by any state. These rights are inherent to all of us, regardless of nationality, sex, ethnicity, colour, religion, language, or any other status. They range from the most fundamental – the right to life – to those that make life worth living, such as the right to food, education, work, health, and liberty.

Human rights are:

- › Universal, equal and non-discriminatory. Article 1 of the Universal Declaration of Human Rights (UDHR) states: "All human beings are born free and equal in dignity and rights." Freedom from discrimination, set out in Article 2 UDHR, is what ensures this equality.¹
- › Inalienable. This means that the rights should not be taken away, except in specific situations and according to due process. For example, the right to liberty may be restricted if a person is found guilty of a crime by a duly recognised court of law.

¹ [What are human rights? | OHCHR](#)

- › Indivisible and interdependent. This means that one set of rights cannot be enjoyed fully without the other. For example, making progress in civil and political rights makes it easier to exercise economic, social and cultural rights. Similarly, violating economic, social and cultural rights can negatively affect many other rights.

In some countries where we operate, human rights are clearly embedded in the society and protected by national law. However, not all countries have embedded human rights in their legislation. Where national law and international human rights standards differ, Royal HaskoningDHV will follow the higher standard. Where they are in conflict, we will adhere to national law, whilst seeking ways to respect international human rights to the greatest extent possible.

3.0 COMMITMENT

Royal HaskoningDHV conducts its business in a manner that respects the rights and dignity of all people, complying with all legal requirements. We neither tolerate nor condone abuse of human rights within any part of our business or value chains, and we will take any allegation(s) of abuse seriously.

We respect human rights and we are guided by:

- › International Bill of Human Rights which encompasses the UDHR, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.
- › The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.
- › The Ten Principles of the United Nations Global Compact.
- › Organisation for Economic Cooperation and Development (OECD) standards.
- › ISO 26000 Guidance on Social Responsibility.
- › United Nations Guiding Principles (UNGPs) on Business and Human Rights.

4.0 KEY HUMAN RIGHTS PRIORITIES

We assessed the possible impact of our business activities on key human rights topics. We identified several areas where we believe the risk exists that our business activities could impact key human rights and therefore deserve our priority.

This does not mean that we have encountered these issues but that they warrant our special attention. To avoid infringing on these human rights we have implemented mitigation measures to safeguard any potential human rights concerns.

We have embedded these specific risks in our [Code of Conduct](#) and are committed to ensure that all business partners, such as clients, suppliers and subcontractors adhere to the same high international human rights standards.

We defined our key human rights priorities as follows:

People and planet

We take responsibility for having a positive impact on the world and we constantly challenge ourselves and others to develop sustainable solutions to local and global issues. We feel the urgency and are committed to accelerate the measurable benefits we deliver. We act with integrity and transparency and hold ourselves to the highest standards of environmental and social governance. Our actions, big and small, will drive the positive change the world needs and will enhance society now and for the future.

Equality, diversity, inclusion and belonging

We are committed to providing an enriching work environment for all our employees and stakeholders. It allows individual skills, strengths, and perspectives to be heard, used, and amplified, regardless of gender, age, sexual orientation, religion, physical ability, or nationality. We offer equal opportunity and embrace diversity of thought. We treasure all our employees and are committed to continuously improve their sense of belonging.

Health, safety and wellbeing

We look out for each other and are committed to the highest standards of health and safety across our operations for our employees as well as our business partners. This is embedded in our culture and behaviour and implemented through processes and procedures to ensure we maintain and continuously improve a healthy and safe working environment for all. We expect our business partners to set the same high standards to ensure the safety of their staff and others.

Labour conditions, employment legislation and respectful behaviour

We actively promote fair working conditions: we ensure fair and equal payment and adhere to any national legal stipulation on minimum wages and maximum working hours in respective countries. We respect employees' right of association within prevailing laws and statutes.

We respect and protect the personal dignity and privacy of every individual and do not tolerate inappropriate treatment of employees or any human being with whom we interact.

Modern slavery and child labour

We have zero tolerance towards modern slavery, human trafficking, and all other forms of forced labour. We affirm UN regulations on children's rights and explicitly condemn child labour. In particular, we are committed to eliminating the worst forms of child labour and we expect our business partners to commit to the same zero tolerance as set in our [Code of Conduct](#).

Privacy and information security

We handle any personal data and information entrusted to us by our stakeholders, such as employees, clients, suppliers and others with utmost care. We are committed to handle that data responsibly, protecting and processing it in a way that complies with our privacy policy and privacy legislation. E.g. European GDPR sets the standards and where more stringent requirements are set by national legislation or clients these will be adhered to.

As a knowledge-centric company, we recognise the importance of information security to protect the interests of our company, our clients, employees, and other stakeholders. Our established policies and procedures protect information resources and systems.

5.0 IMPLEMENTATION

International recognised human rights and its status in a country evolve continuously. Moreover, the human rights risks associated with specific industries may also vary over time. Recognising this dynamic nature and adequately addressing changes in human rights standards and legislation, our human rights policy and its implementation will be subject to regular and periodic reviews.

To continue to grow in protecting human rights and fulfil our responsibility in the value chain, Royal HaskoningDHV continues to evolve and refine our human rights priorities. A human rights mapping will further strengthen the assessment of human rights risks for our operations, focusing on potential risks to people. The findings of the mapping will be incorporated into this policy, and relevant internal functions and processes will be reviewed to ensure that potential adverse human rights impacts are effectively prevented.

This human rights policy is embedded in our way of working by:

Enhancing Society Together: Our Purpose Chart

To guide our staff in delivering meaningfully against our purpose, Enhancing Society Together, Royal HaskoningDHV's purpose matrix addresses our 5 themes in a tangible and consistent way to provide a reference in conversations, proposals, projects, products and services. This matrix challenges us to consider four levels of impact on people and planet in our everyday go/no go decisions and set a high bar to accelerating the measurable benefits we deliver. We are tracking our progress on each theme. More information can be found on our [website](#).

We actively collaborate with clients, partners and stakeholders in projects and initiatives on this.

ISO37001 and ISO37301

Integrity is of utmost importance to us. Our integrity policy is embedded throughout the company in our CIMS, audited and certified since 2010. As of 2020, we comply with international ISO standards and have been certified as meeting the requirements of ISO 37001 for our Anti-Bribery Management system as well ISO 37301 standard for our CIMS.

Training

Our full intention is that we act with transparency and integrity in all our business dealings. Therefore, our employees are trained on our [Code of Conduct](#) through compulsory e-learning and we provide human rights awareness training via our digital learning platform, which is available to all staff. Further awareness raising takes place continuously through engaging dialogues on our purpose. Integrity and compliance is also a standard agenda item on regular staff-, management- and project meetings.

Due diligence

To further improve control over our value chain, new clients undergo a third-party assessment. This includes screening for any abuse of human rights. If a client has been accused or convicted for an abuse of human rights, our processes support a balanced decision whether we can work for the client or not. Also during project vetting a project risk assessment is conducted, which includes social impact aspects.

We continue to develop our due diligence processes to gain more insight and ensure we understand the best approaches to identifying and preventing risks for people.

Dilemma dialogues

We encourage our employees to have dialogues on dilemmas and controversial topics to raise awareness and offer support in doing the right thing when facing challenging dilemmas. It is essential to foster an open culture where we can have an open debate on what is right as there are not always clear-cut answers.

In interactions with our business partners, we seek similar dialogues and call upon their responsibility to be similarly committed to have a positive impact on people and planet and respecting human rights.

Reporting a concern

Clients, employees and other stakeholders can trust that we act with a deep commitment to social responsibility, integrity, human rights and accountability. Only then can we deliver on our purpose of Enhancing Society Together.

We encourage everyone to speak up with any concerns or dilemmas. More information about speaking up can be found on Insight or on our [corporate website](#).

When a concern or dilemma has been submitted an investigation procedure is followed to assess if a breach towards our [Code of Conduct](#) has occurred. Suitable corrective measures are taken where necessary. Individuals who speak up will not be subject to retaliation.

6.0 DEFINITIONS

Open

Open for public. Information that can be made freely available in the public domain and would not cause damage or harm if released.

7.0 ABBREVIATIONS

Abbreviation	Description
CIMS	Compliance Integrity Management System
GDPR	General Data Protection Regulation
ILO	International Labour Organization's
LCO	Local Compliance Officer
OECD	Organisation for Economic Cooperation and Development
UDHR	Universal Declaration of Human Rights
UNGP	United Nations Guiding Principles

8.0 REFERENCE DOCUMENTS

Document Number	Document Title
RHDHV-GL-I-IC-POL-0005	Code of Conduct
RHDHV-GL-I-PE-PFL-0016	Complaints and Raising Concerns Process
RHDHV-GL-I-IC-POL-0001	Compliance Integrity Management System Policy
RHDHV-GL-I-IC-PRO-0002	Investigation Procedure
RHDHV-GL-I-IC-PST-0002	Modern Slavery Act Policy Statement
RDHVH-UK-I-IC-PST-0001	Modern Slavery Act UK Statement
RHDHV-GL-I-IC-POL-0003	Speak Up, Reporting and Non-Retaliation Policy

9.0 CODES AND STANDARDS

Document Number	Document Title
ISO 37001:2016	Anti-Bribery Management System
ISO 37301:2021	Compliance Integrity Management System

10.0 REVISION HISTORY

REVISION	DATE	STATUS / REASON FOR ISSUE
A01	30-Aug-2023	Discipline Check
B01	11-Oct-2023	Internal Review
C01	17-Oct-2023	Compliance Check
00	23-Oct-2023	Approved for Use

11.0 RECORDS

Not included in this issue.

12.0 DOCUMENT RACI

	Responsible	Accountable	Consulted	Informed
Development	Group Compliance Officer	Executive Board	Director Internal Audit, Risk & Compliance	
Publication	Group Compliance Officer	Executive Board		All RHDHV employees
Training	Group Compliance Officer and Local Compliance Officer	Executive Board		All RHDHV employees

› **Responsible (R)**

The author of a document. The author is expected to be knowledgeable and experienced within the subject matter of the document and have experience in business writing. The author cannot be the checker, nor the approver of their own document. The author is responsible for ensuring a document is published, and that the required training is carried out.

› **Accountable (A)**

Also known as the approver; ultimately answerable for the correct and thorough completion of the document, its publication and training on the content as required. The accountable person assigns an author and is the final approver of the document. The accountable person can also fill the role of document checker/reviewer. Personnel filling the Accountable role (approver) cannot also fill the Responsible role (author).

› **Consulted (C)**

Those whose opinions are sought, typically subject-matter experts. Departments or organisational groups whose processes and related documents may be affected are also generally consulted during the checking and review phase of the document lifecycle.

› **Informed (I)**

Those who may be kept up to date on progress, though usually are only informed when the document is published; their work practices are either directly or indirectly impacted by the document. Once a document is published, those who are impacted by the IMS Document are informed that it is now issued for use. If the document is a process, procedure, work instruction, guideline, or standard, consideration will also need to be given to the required level of training required by those in the Informed group.