

MODERN SLAVERY STATEMENT

2025

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	Vendor Code of Conduct
JDN-POL-0002	QHSSE Policy Statement
JDN-POL-0007	Sustainable Procurement 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
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.
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).
CSRD	CSRD is the European Union’s Corporate Sustainability Reporting Directive.
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.
Deceptive recruiting	Describes situations where the victim is deceived about exploitation through a type of modern slavery.
Employee worker	Employees are directly employed by Jan De Nul. This group includes crew members, workers, staff, and employees in local hubs.
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.

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.
Managed vendor	Vendor with an aggregate yearly spend between EUR 250,000 and EUR 1 million.
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.
Non-employee worker	Non-employee workers are part of our own workforce, but they are not employed by Jan De Nul. They work through temporary employment agencies or as freelance contractors. This group mainly consists of crew members deployed via crewing agencies.
Service provider	The party that provides a service.
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.
Strategic counterparty	Counterparty with an aggregate yearly spend of EUR 1 million or more.
Strategic vendor	Vendor with an aggregate yearly spend of EUR 1 million or more.
Subcontractor	The party that provides a product, and/or service, and/or activity and has the responsibility of performing part of the obligations under an existing contract with a client.
Supplier	The party that provides a product or a service.
Vendor	Any natural or legal person (the party) with whom Jan De Nul conducts business or intends to do, including Subcontractor, Supplier, or Service providers.

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Purpose

This Modern Slavery Statement (hereinafter referred to as this “**Statement**”) describes the steps Jan De Nul has taken, across the company, 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 2025 to 31 December 2025

This Statement replaces any previous Modern Slavery Statements.

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

This table outlines where the recommended and optional areas of the UK Modern Slavery Act, are addressed within this statement:

UK Modern Slavery Act	Chapter in this Statement	Page number
The organisation's structure and supply chains	Our business, organisation structure and value chain	6
Policies in relation to slavery and human trafficking	Reference documents	2
Due diligence processes	Due diligence processes	7
Risk assessment and management	Risk assessment	8
Due diligence, Policies & Training	Prevention, mitigation and remediation measures	9
Key performance indicators to measure effectiveness of steps being taken	Monitoring and effectiveness evaluation	12
Training on modern slavery and trafficking	Prevention, mitigation and remediation measures towards own workforce - training	10

1 Our commitment

We commit to respecting all internationally recognised human rights and applicable standards considering the interests of our customers and 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 operations 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 almost 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 almost 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 force that moves us forward, 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 entities it owns and controls to enable consolidated reporting. This reporting 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. In 2025, we purchased goods and services with 13,164 direct vendors across 109 countries. Approximately 5.3% of our direct spend was with UK-based vendors. Approximately 58.4% 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. Engineering & Construction Services
2. Industrial Machinery & Goods
3. Professional & Commercial Services

The Procurement Department has a dedicated colleague responsible for leading our responsible sourcing strategy, including efforts related to modern slavery.

3 Due diligence processes

Jan De Nul carries out **due diligence across its own operations and value chain**, identifying and addressing potential adverse impacts on human rights and the environment arising from its activities. This due diligence process is applied across a range of sustainability topics and includes specific measures related to the prevention of slavery and human trafficking within its business and value chain.

Given the inherent complexities associated with civil works, demanding maritime and environmental projects, and pioneering developments in the offshore and renewable energy sectors worldwide, Jan De Nul is developing a **comprehensive Due Diligence Procedure** to guide its activities. This initiative not only ensures compliance with the UK Modern Slavery Act and the Commonwealth Modern Slavery Act 2018 but also responds to evolving regulatory frameworks and stakeholder expectations.

Jan De Nul is committed to executing its projects in a manner that prevents and mitigates adverse impacts within its own operations and throughout its value chain. The objective of this procedure is to ensure that Jan De Nul's activities do not contribute to human rights violations, modern slavery, unethical business practices, or harm to 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 embedded in our sustainability policy communicated internally and externally and 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 based on internal and external data sources.
3. **Prevention, mitigation and remediation measures:** we prioritise and select relevant prevention and mitigation measures based on 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 put in place various policies to ensure that all business activities are carried out ethically and with integrity, as described in the reference documents on page 2.

3.2 Risk Assessment

Strategic counterparties (e.g. clients and vendors) in critical value chains are assessed against abstract risk positions (country level). To determine whether a location is identified as high-risk, countries 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
- CSR Risk Check
- ILO (International Labour Association)
- SPI (Social Progress Index)
- EPI (Environmental Performance Index)

After analysis of these tools, we decided to perform the **abstract risk assessment** via an accumulation of the results of the ILO, SPI and the EPI. This approach allows us to consider country-specific environmental, social, labour and governance issues. This method will be reviewed in 2027.

Depending on the outcome of the abstract risk assessment, **additional due diligence steps** are required such as:

1. Additional detailed desktop assessment;
2. Sending out and analysis of the self-assessment questionnaire. In 2025 we reviewed and implemented a new version of the vendor assessment form with a more integrated approach to sustainability (social – environmental – governance topics). After the review of each assessment, tailored corrective actions are proposed for the assessed vendor.
3. Request for further mapping of the value chain by addition of specific question thereto in the revised vendor assessment form.
4. Contractual clauses to prevent and mitigate the negative impacts;
5. Site visit and targeted due diligence audit.

We actively participate in modern slavery briefings organised by our customers, such as SSE in June 2026. In 2026 we will review the vendor evaluation form to also include a more integrated approach to sustainability.

A concrete example of how we implement the risk assessment: procurement of new workwear

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. In 2025 we strengthened the collaboration with the supplier of workwear to assess tier-2 suppliers. In 2026 we conducted a targeted due diligence audit on a tier-2 supplier in a high-risk country.

3.3 Prevention, mitigation and remediation measures

3.3.1 Measures towards vendors

Prevention, mitigation and remediation measures are taken towards new vendors during onboarding (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. On-site vendor audits executed in 2025 varied from a rock supplier in Europe to a shipyard in Asia.

Audits are twofold: observation and direct engagement. Our trained and experienced colleagues in QHSSE observe working conditions on-site and engage directly with people. Observations focus on safety and operational practices, including housekeeping, hazardous substances, personal protective equipment (PPE), first aid equipment, and safety awareness, for example, through the presence of notice boards. In parallel, auditors review documentation and ask questions to verify secure employment, working hours, and compliance with laws on child and forced labour.

- Check on adherence to our Vendor 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 approach: any confirmed violations will lead to appropriate actions.

3.3.2 Measures towards own workforce – language lessons for crew and supply chain workforce

We introduced language lessons for supply chain workforce on several projects in 2025. These lessons help the workforce to better understand instructions, safety guidelines, and daily operational communication on site. By improving language skills, these initiatives support safer working environments, facilitate smoother cooperation between international project teams and locals, and contribute to greater inclusion and professional development within the supply chain workforce.

3.3.3 Measures towards own workforce – training

Prevention and mitigation measures are in place, including the following training:

I. Modern Slavery Training

In 2024 our modern slavery training was updated. 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 of modern slavery?

II. Code of Conduct Training

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. The data on monitoring are in Chapter 3.5.

III. Sustainable Procurement Training

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. For procurement department, training on sustainability is a fixed topic in Quarterly Procurement Meeting.

In 2025, we established and launched the Buyer Expert Program. This initiative provides training on a wide range of sustainability (ESG) topics related to procurement, with the aim of ensuring that each procurement division includes a dedicated sustainable procurement expert.

Furthermore, in 2026 we will start with the inclusion of a specific sustainability chapter in all vessel induction e-modules for day visitors.

3.4 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 as well as the health & safety incident and observation reporting system through our software system Intalex.

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.

3.4.1 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>.

3.4.2 Confidential counsellors

Confidential counsellors offer psychosocial support for problematic situations at work where cases can include verbal or physical aggression, sexual intimidation, and stress. The counsellors then inform, listen and advise. If necessary and possible, they also try to facilitate conciliation. Employees and non-employee workers can also turn to the confidential counsellors of Mensura, our external wellbeing partner based in Belgium.

3.4.3 Compliance officer

Reporting an infringement of the Code of Conduct protects the continuity of our company. Each employee and non-employee worker should therefore feel at ease to report possible breaches to their supervisor. If a possible breach of this Code has been reported to a supervisor and no action has been taken, the employee is encouraged to contact our Compliance Department.

3.4.4 On-board complaint procedure

When crew members experience a possible breach of rights, they can use the onboard Maritime Labour Convention (MLC) complaint procedure, available on all our vessels. Discretion and confidentiality are guaranteed. Moreover, they are allowed and encouraged to approach the Master, Crew Department or crewing agent for complaints. 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.

3.4.5 Incident Management Procedure

All accidents and near-misses must be reported through the incident module in our global QHSSE management software. Unsafe conditions or unsafe behaviour observed on site are generally not considered incidents. These are handled through a separate process and reported in the Observation module in our Global QHSSE Management Software.

Reports can be submitted via the mobile app or web platform. The QHSSE Incident Management Team reviews all reported incidents and provides support, including guidance on investigations.

Depending on the type of incident, the final investigation report must be approved by the Project Manager, Area Manager, or Fleet Manager. Once the incident is closed, corrective actions are implemented, and their progress is monitored by the QHSSE Advisor and lessons learnt are shared with colleagues involved.

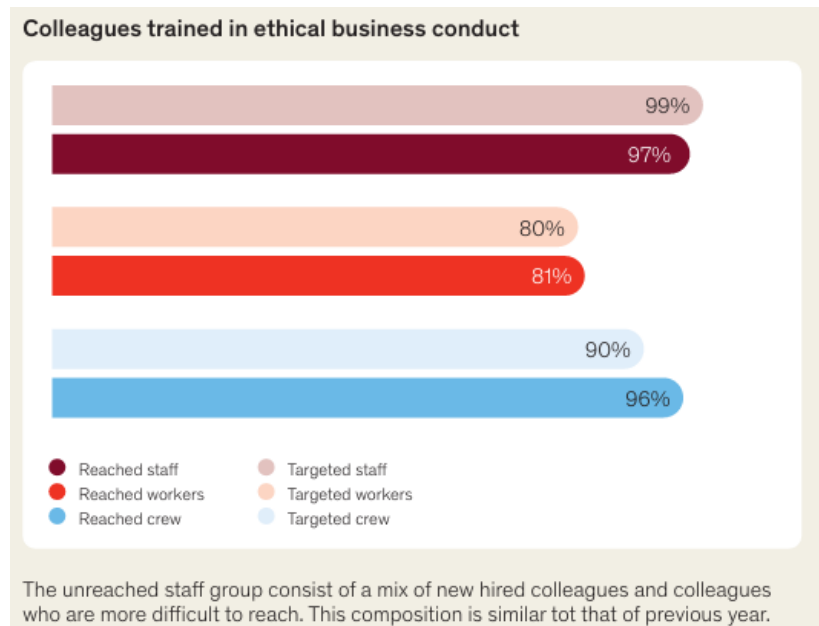
3.4.6 Trade unions or other worker representative groups

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'.

3.5 Monitoring and effectiveness evaluation

3.5.1 Effective tracking and monitoring of Code of Conduct Training

Goals and key performance indicators (KPIs) for Code of Conduct Training are explicitly set for our workers, staff and crew. The chart below shows the 2025 data, where two of the three data points even exceed the set targets.



3.5.2 Effective tracking and monitoring of grievances

For 2025, the number of complaints received per channel is shown below. These figures reflect the complaints we received independently, before any assessment of their substantiation or validity.

Channel	Number of social complaints submitted by own workforce
Maritime Labour Convention	2
Whistleblowing procedure	3
Compliance mailbox	0
Mensura	9*
Confidential counsellors	20**

* *Mensura received 9 grievances, all of which concerned introductory conversations or requests for advice, with no further intervention or reconciliation required.*

** *The confidential counsellors received 20 grievances: 11 involved introductory conversations or advice, 5 required further intervention, and 4 resulted in reconciliation.*

3.5.3 Engaging with others

We engage with various stakeholders to help monitor working conditions across our operations and value chain. Vendors' workers are specifically identified as a stakeholder group. We address the perspective of the supply chain workforce as follows:

- **Procurement:** in the general conditions of Purchase and Hire, Service providers and consultants and subcontractors, the perspective of the supply chain workforce is highlighted as a crucial element.
- **Tenders:** vendors are expected to provide verifiable documentation and evidence related to specific sustainability criteria as part of the prequalification process.
- **Vendor assessments:** we conduct evaluations of our vendors to assess their adherence to the Vendor Code of Conduct.
- **QHSSE certifications:** vendors are required to provide the latest certifications demonstrating compliance with QHSSE standards.

Specifically, this means the following:

Engagement before contract

- Responsible: Procurement Manager
- How: via risk assessments which identify counterparties that align with our vision and commitments, as well as those that may pose potential risks

Engagement during contract

- Responsible: Project Manager
- How:
 - Free access for our company: at all times, we should be able to access our vendors' premises for the purpose of monitoring quality, HSE assurance audits, and surveillance.
 - HSE representatives: we require our vendors to appoint an HSE representative to be present during the activities at the work location.
 - HSSE workshops: subcontractors must organise HSSE workshops for each of their planned activities, with an invitation for our project representative.
 - Employee communication: subcontractors organise and commit themselves to communicating the hazards and controls to the employees accessing the site, always in the appropriate language. The subcontractor needs to keep record and make this information available on our request. In case of accidents, incidents or damage, we are informed.
 - Employee training: subcontractors should ensure that all their personnel are familiarised with the emergency procedures and that sufficiently trained people and equipment are available. Our e-learning HSE Induction is available for training purposes.
 - Employee equipment: vendors need to provide all required personal protective equipment, as well as permits to work.

Engagement after contract

- Responsible: Procurement Manager
- How: via evaluations which assess whether all requirements were met by our vendor.

3.5.4 International Responsible Business Conduct Agreement (IRBC)

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.

In 2025, we improved our rating from an intermediate to an advanced level, achieving a score of 65%. Key strengths identified included the concreteness of several policies, supported by extensive documentation, strong integration within the organisation, and clearly defined responsibilities at senior (board) level. For example, the assessment highlighted that Jan De Nul's QHSSE standards are governed by well-defined rules and are firmly embedded in daily operations. Additionally, risk management at the project level was identified as a particular strength.

3.6 Reporting

On May 21, 2026 our Sustainability report for financial year 2025 was published. Even though this report is not CSRD compliant, it is CSRD inspired and already covering the majority of the CSRD reporting requirements. The report can be consulted at the following link: <https://www.jandenul.com/annual-report-2025>.