

Code of Conduct for Subcontractors

Introduction

DHI is the expert in water environments.

We are committed to conducting our business activities in full compliance with applicable laws, rules, and regulations and strive to continuously improve our social and environmental performance throughout our entire value chain.

We take responsibility for our actions and we require our subcontractors (“Subcontractors”) to do the same.

This Code of Conduct for Subcontractors defines our basic requirements in the area of human rights and working conditions, the environment, and business integrity. It is based on the United Nations (UN) Global Compact, which DHI signed as a participant in 2014, and the International Federation of Consulting Engineers (FIDIC) Code of Ethics.

We require our Subcontractors to comply with national laws and regulations as well as implementing the principles described in this Code of Conduct for Subcontractors in their own businesses or have at least equivalent standards adopted and conduct their business in accordance therewith.

Subcontractors working in DHI operated areas must additionally meet specific requirements in relation to health and safety, environment, and quality. These requirements will be communicated separately to the Subcontractors.

We require our Subcontractors to ensure that their own subcontractors are aware of and comply with the principles expressed in this Code of Conduct.

DHI will continuously monitor Subcontractors’ compliance with the standards set out in this Code of Conduct for Subcontractors by asking subcontractors to provide relevant information and also by conducting supplier audits and reviews.

Human Rights and Working Conditions

DHI requires its Subcontractors to support and protect human rights both in the workplace and more broadly in all their business activities. All employees and workers are to be treated fairly, with dignity and respect.

Freedom of Association and Collective Bargaining

Subcontractors shall recognise and respect the rights of employees to freely associate, organise, and bargain collectively. In situations where the right to freedom of association and collective bargaining is restricted under law, Subcontractors shall allow workers to freely elect their own representatives.

Forced Labour

Subcontractors shall prohibit any use of forced, bonded, indentured labour, or involuntary prison labour. All work, including overtime work, shall be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice. Subcontractors shall not mandate that workers hand over government-issued identification, passports, or work permits as a condition of employment.

Child Labour and Young Workers

Subcontractors shall work against all forms of child labour. Subcontractors must not employ children below the minimum age of employment or the age for completing compulsory education in that country, whichever is higher. Subcontractors must not employ any young workers under the age of 18 to perform any work that is likely to be hazardous or harmful to their health and safety.

Non-discrimination

Subcontractors shall not practice any form of discrimination in hiring and employment practices including access to training, promotions, and rewards on the grounds of race, colour, religion, gender, sexual orientation, age, physical ability, health condition, political opinion, nationality, social or ethnic origin, union membership, or marital status.

Health and Safety

Subcontractors shall ensure a safe and healthy workplace or any other location where production or work is undertaken. Appropriate health and safety information, training, and equipment shall be provided to all workers.

Wages and Benefits

Subcontractors must pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. All employment conditions, including compensations, working hours, vacation time, leave periods, and holidays must be consistent with applicable laws and regulations, especially mandatory industry standards.

Environment

DHI requires its Subcontractors to manage their operations responsibly in relation to environmental risks and impacts and to adopt a precautionary approach in their business operations. Resources such as water and energy shall be used efficiently.

Environmental Legislation

Subcontractors must obtain and maintain all required permits and licenses and comply with the operational and reporting requirements of such permits and licenses.

Waste Management and Pollution Prevention

Subcontractors shall endeavour to avoid or reduce any waste or emissions as a result of their business activities.

Subcontractors shall use efficient technologies that aim to reduce the environmental impact as much as reasonably practicable.

Environmental Management Systems

DHI's Subcontractors whose activities have an environmental impact shall have a structured and systematic approach to take environmental aspects into account that includes establishing suitable management systems for environmental protection, setting targets, and performing follow-ups.

Business Integrity

DHI requires its Subcontractors to conduct business in compliance with legal requirements and to adhere to internationally agreed standards of business ethics.

Legal Compliance

Subcontractors must comply with all applicable laws, rules, and regulations in the countries in which they carry out their business activities.

Anti-corruption

DHI's Subcontractors shall be familiar with and in strict compliance with the United States Foreign Corrupt Practices Act, the Bribery Act of England and Wales, the United Nations Convention against Corruption, and any similar local legislation, statutes, and regulations relating to anti-bribery and anti-corruption, its prohibitions and purposes, and shall not undertake any actions that may violate these rules. Accordingly, Subcontractors agree not to (1) engage in or tolerate any form of corruption, bribery, extortion or embezzlement, and (2) not to offer or accept any benefits or other means to obtain any undue or improper advantage. Such improper benefits may comprise cash, non-monetary gifts, pleasure trips, or services and amenities of any other nature.

Conflict of Interests

Subcontractors shall avoid conflicts of interest that may compromise the supplier's credibility in the DHI Group or other exterior parties' confidence in the DHI Group.

Protection of Third Party Rights and Information

Subcontractors must respect intellectual property rights and protect confidential information by safeguarding it against misuse, theft, fraud, or improper disclosure.

Commitment

DHI requires its subcontractors to show their commitment to the principles defined herein by establishing suitable monitoring systems and by following up in case they receive knowledge of any violations.

Monitoring System

Subcontractors shall have adequate systems and controls in place to ensure compliance with these standards or equivalent standards. Subcontractors' systems and controls shall also apply to the subcontractors and suppliers they work with who are connected, directly or indirectly, with providing goods and services to DHI. Subcontractors shall upon request from DHI provide to DHI a written certification of their own, and/or their subcontractors' and suppliers', compliance herewith.

Consequences in Case of Violations

Subcontractors shall address any violations (irrespective of the size, nature, or materiality of such violation) of these standards or equivalent standards that come to their knowledge and take appropriate actions. Depending on the severity of the violation, appropriate actions could be a request for corrective measures but also the termination of the cooperation with any employee, sub-subcontractor, or supplier who mandated, facilitated, or applied unacceptable methods, and in case of claims, penalties or liabilities of any nature whatsoever against DHI, the Subcontractors shall defend, indemnify, and hold DHI harmless to the extent legally possible. For the avoidance of doubt: DHI applies a zero tolerance policy in terms of breach of this Code of Conduct for Subcontractors.