

Reporting of Concerns policy

1. General

Van Oord attaches great importance to a good social working environment and an open culture, within which concerns about conduct can be discussed and corrected. This document lays out our policy on dealing with such concerns.

2. Who does the Code of Conduct apply to?

This Code applies to all employees of Van Oord, its subsidiaries and joint ventures which Van Oord controls.

3. What constitutes suspected concern?

Van Oord has a Code of Conduct that sets out our company's values. For the purposes of this policy, suspected concerns shall be understood to mean any concern about an activity of a general, financial, operational or personal nature that contravenes the Code of Conduct, whereby the suspicion is reasonably founded and there is a potential threat to public interest.

4. What is the procedure?

Employees can report suspected concerns to their immediate manager, or to one of the Trusted Independent Persons or the Compliance Officer, who are designated to fulfil this role under this Policy and whose contact details may be found at the end of this document.

- The report to a Trusted Independent Person or the Compliance Officer is made electronically only, via the following email address: reportingconcerns@vanoord.com.
- Within one week of having received the report, the Trusted Independent Person or the Compliance Officer will send the reporter confirmation of receipt, and inform the reporter of the time period within which the report will be dealt with. This time period may not exceed four weeks from the date of receipt of the report.

- The Compliance Officer will inform the Van Oord Executive Board that the report has been received, except in cases where the report relates to a member of the Executive Board. In that case the Compliance Officer will inform the chairman of the Supervisory Board instead. The Trusted Independent Person or the Compliance Officer will also inform the reporter.
- All communication between Van Oord and the reporter must take place via the Trusted Independent Person or the Compliance Officer.
- The Executive Board (or, where relevant, the Supervisory Board) may decide to further investigate the suspected wrongdoing, in which case a person is appointed to lead the investigation. The leader of the investigation will report directly and exclusively to the Executive Board (or, where relevant, the Supervisory Board).
- The Trusted Independent Person or the Compliance Officer will inform the reporter within a maximum of four weeks of how the report has been dealt with and which measures, if any, have been taken. If, due to unforeseen circumstances, this deadline cannot be met, the Trusted Independent Person or the Compliance Officer will inform the reporter and shall indicate when the reporter will be informed on how his/her report has been dealt with.
- If the reporter does not agree with how Van Oord has dealt with the report, he/she can make an external report.

5. Advisor

The reporter is at liberty to consult an advisor in confidence about a suspected wrongdoing.

6. Confidentiality

The reporting of suspected wrongdoing and all the related correspondence and processing are treated as strictly private and confidential, unless the reporter releases the immediate manager, the Trusted Independent Person or the Compliance Officer from his/her duty of confidentiality.

7. Protection of the reporter against detriment

The company guarantees that a reporter who has reported concerns properly and in good faith will be protected against detriment.

8. Adoption of Reporting of Concerns Policy

This policy was adopted by the Executive Board and will be placed on the intranet and company website.

Rotterdam, 18 April 2018



Pieter van Oord
CEO

Trusted Independent Persons

John Knoester

Compliance Officer:
Job de Groot

Contact via: reportingconcerns@vanoord.com