



Code of Conduct
on Doing Business
with Integrity

All Right

 Strukton

Foreword by the management

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At Strukton, we defend sustainability, safety, and integrity. Our goal is that everyone who works for us feels engaged with these three fundamental values.

This Code of Conduct on Doing Business with Integrity addresses integrity, but what does that word really mean? Integrity is a difficult concept, and we all have different ideas about what it entails. What an individual understands by integrity depends on their background, beliefs, and what they've experienced in life.

In our Code of Conduct on Doing Business with Integrity, we explain what we mean by integrity at Strukton. We list the most important rules and principles.

Please read the Code of Conduct carefully, and think about how it applies to you and your work.

The Code of Conduct is not fixed in stone. We regularly review the rules, because the world around us is changing and the way we interact with it changes too.

If something is unclear, talk about it! Discuss it with your manager, HR, or the compliance officer. The more we talk about integrity, the more it becomes embedded in our thoughts and actions.

By conducting business with integrity, with our Code of Conduct as a guide, we work together on maintaining and growing our business and long-term viability as a place of employment. Thank you in advance for your cooperation.

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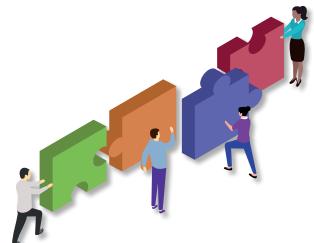
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Who does the Code of Conduct apply to?





Speak out!

If you suspect this Code of Conduct has been violated, you're obliged to raise the matter internally in an appropriate manner.



The Code of Conduct on Doing Business with Integrity applies to everyone who works at Strukton or for Strukton. **That means the code applies to you if you work for Strukton as an employee, as an independent contractor, through a secondment or employment agency, as an intern, or as a volunteer.** You will be referred to this code when you enter employment, and we may ask you to sign confirming that you will abide by it, especially if you have a commercial position.

You're personally responsible for complying with the Code of Conduct, so you're also responsible for understanding the code and asking about anything unclear to you. We've tried to explain the rules and principles as clearly as possible in this document, but in your daily work you will probably encounter situations

without a ready-made answer in this Code of Conduct, or where there is room for interpretation. Not surprising, as every situation is unique. If you have any doubts, contact your manager or a colleague from HR. If you're both unable to reach a conclusion, you can ask a compliance officer. We always leave the interpretation of legal rules in specific situations to lawyers.

Speak out!

Speak to each other

At Strukton, we want an open working atmosphere, where people can question the course of events without being judged. In such an open environment, any violations of the Code of Conduct or even serious abuses can be detected quickly and corrected. If you also commit yourself to an open working atmosphere, you contribute to Strukton's success and

viability in the long-term as a place of employment.

Doing business together with integrity means, first and foremost, making sure everyone's onboard with the rules. Are you worried about things you come across in the workplace? Unhealthy, unsafe, illegal, or unfair situations? Ask your colleagues about what's happening. If necessary, speak to them about their behaviour. If a close colleague discusses a possible violation, they deserve your support. Conversely, if a colleague speaks to you about something for which you're responsible, don't see it as an attack on you personally, but respond to the situation mentioned.

Report possible violations

If you suspect this Code of Conduct has been violated, you're obliged to raise the matter internally in an appropriate

manner. Ignoring it can only make the situation worse. In principle, speak about what you've seen and your concerns with your manager, and look for a solution together. You can also talk to a compliance officer or internal or external confidential counsellor.

You must in any case let the compliance officer know if you have suspicions about matters punishable by prison sentences, such as fraud, theft, corruption, and prohibited restrictions on competition. In extreme cases, or if you want to make a report anonymously, you can also turn to an external confidential counsellor. This is also the case if you or someone else is incited to commit a violation. Your report, in whatever form you make it, will always be treated confidentially. There will be no negative consequences for your position at Strukton. Strukton's Reporting

Procedure explains how the entire process is arranged.

Possible consequences for violations

The Code of Conduct is not voluntary, and any violations can result in sanctions. These vary according to the seriousness of the event, from reprimand, suspension, fine, and dismissal to summary dismissal. These are sanctions under labour laws, but civil law sanctions are also possible, such as liability (damage claims) and even criminal sanctions. The possible consequences are further detailed in our sanctions policy.

You must let a compliance officer know if you have suspicions about matters punishable by prison sentence.

2 Safety



2.1 SAFETY IN THE WORKPLACE

It's essential for our employees and our organization that work is safe and healthy, 24 hours a day, 7 days a week: 24Safe. In view of our professionalism, we're always conscious of quality, safety, and working conditions. Together, we can ensure that everyone can enjoy their retirement in good health. Our attitude towards safety and health is positive, constructive, and always looking for the good in things. However, if the safety regulations and rules are broken, we immediately intervene and apply our sanctions policy if necessary.



Safety standards

Make sure you know and comply with the applicable safety standards and Life Saving Rules

What does this mean for you?

- Make sure you know the applicable safety standards and Life Saving Rules, and abide by them.
- Always remain alert to high-risk situations. Health and safety must never be ignored just to get a job done. For this reason, you must not start work before the safety measures are known, shared, and organized. You may stop work if you think that health or safety are at risk
- Speak to each other about the safety of situations or behaviour in the workplace, and report hazards!
- Never work under the influence of alcohol or drugs, and report the use of medications that affect, or could affect, your reaction time

2.2 A SAFE AND INCLUSIVE WORKING ENVIRONMENT

The essence of dealing with colleagues is very simple: treat all colleagues in the way you would like to be treated yourself. So, with respect and honesty. That allows us all to enjoy our work, and work together effectively on Strukton's future. We want to provide a mentally healthy and supportive environment for all employees and everyone who works with us.

Equal opportunities and diversity

You are welcome at our company, whatever your gender, skin colour, sexual orientation, religion, character, or background. To operate successfully, Strukton needs a diverse range of people and talents. We want all our teams to reflect diversity in society, and we expect you to share this attitude. We give you the

space to be who you are, and we ask you to give the same space to your colleagues. Discrimination arises if you don't do this, whether intentionally or unintentionally. We do not tolerate discrimination of any type, including on the grounds of race, gender, age, ethnic origin, nationality, religion, health, disability, marital status, sexual preference, or political or philosophical beliefs.

Inappropriate behaviour

We respect each other's space, so there is no room for sexual harassment, bullying, physical or psychological violence, coercion, or intimidation at Strukton. How do we prevent inappropriate behaviour in the organization? By looking critically at ourselves and keeping each other alert. If you come across behaviour that violates the rules of conduct, speak to the colleague in question about this, and



Prevent intimidation

What does this mean for you?

- Treat every colleague with respect
- Support your colleagues, and suggest they contact a counsellor if you think they need help
- Prevent intimidation, bullying, discrimination, aggression, or violence, irrespective of the background to it, and prevent behaviour that excludes others. If you come across such behaviour, say or do something about it.
- Do not participate in activities that are inappropriate, offensive, insulting, or intimidating to others. Just because you don't find something offensive, doesn't mean it isn't offensive to someone else

literally and figuratively stand between them and the victim. If this doesn't help, you'll have to discuss it with your manager. Your manager will try to find a solution together with you. If you're in need of guidance or expert care, an internal or external confidential counsellor is always on hand to help you. (For more, see our Inappropriate Behaviour procedure)

2.3 USE OF COMPANY RESOURCES

Resources owned by Strukton

You need more than just your brains and your hands to do your job at Strukton, so we provide you with all kinds of resources. Ranging from phones and laptops to technical tools, machines, and cars, these resources are owned or leased by Strukton. We expect you to use these items with care. Nevertheless, we understand that something can break, get

lost, or be stolen. Report this immediately to your manager (if a phone or laptop is lost or stolen, immediately let the ICT department know, who will ensure that the security officer is also informed). If you have been careful with the item in question, you don't have to worry about negative consequences for you.

Private use

Strukton believes it's important to strike a good balance between work and private life, so we understand that you occasionally use your phone or laptop for private matters too. However, Strukton's tools, machines, and cars are not intended for private tasks, as this leads to risks of damage and unnecessary wear and tear for Strukton. Materials, such as printer paper, sand, and steel, belong to Strukton or our customers, and must not be taken for private use.



**Do not use any tools
or surplus materials for
private jobs**



What does this mean for you?

- Protect all Strukton's equipment during use against misuse, damage, loss, and theft
- Tools, machines, and cars must not be used for private jobs
- Waste or surplus materials must not be used for personal purposes, or resold for personal gain. The latter is considered theft, and we have a zero tolerance policy in this respect
- Unsure how to deal with waste or surplus materials? Ask your manager or the compliance officer

Means of communication

If you work for Strukton, we make sure that you can communicate through tools such as a phone, e-mail, tablet, laptop, etc. However, where these are made available by Strukton, they remain Strukton's property. We expect you to use them mainly for work-related communications, as described in our IT Code of Conduct.

We're also aware that it's important to strike a good balance between work and private life, so we understand that you occasionally use these means of communication for private matters too, if absolutely necessary.



Do not use your work phone or work e-mail address for your personal social media accounts

What does this mean for you?

- Do not use your work phone and e-mail address for your personal social media accounts
- If you have any other side jobs outside Strukton, such as your own e-store or a bed & breakfast, for example, ***you must never use your Strukton e-mail account, laptop or phone for them.***
- The means of communication may also be used privately from time to time, provided this does not break the rules in our IT Code of Conduct policy, disrupt business activities, or result in additional costs for Strukton

Information security

Safety and security are important issues in multiple areas; not just during our work on the construction site, but also in our digital working environment. The organization receives and processes considerable quantities of data, including personal data, such as customer information, financial data, project specifications, and employee data. It's important that we handle this data securely and carefully. Strukton secures its systems as much as possible, but the effectiveness of this also depends on how users treat these systems. We need your help in this respect.



Keep your computer secure

Only install software approved by the ICT department.

What does this mean for you?

- Keep your computer secure. Never leave it unattended without locking your screen
- Keep your login details secret. Use secure passwords, and keep them hidden
- Store sensitive information out of sight. Never leave information on your desk
- Always meet external visitors at reception, and never let them walk through the office unaccompanied
- Only install software approved by the ICT department. Be careful which websites you visit, and remain vigilant
- Be careful with public Wi-Fi networks. If you want to send confidential information while travelling, temporarily use the 5G connection of your laptop or smartphone
- If you lose your laptop or smartphone, let the ICT department know as quickly as possible
- Keep each other alert: if you a colleague doing anything that could jeopardize security, speak to them about it. If you witness a security incident, send an e-mail to the **Data Breaches and Security Incidents Reporting Centre**. We can then intervene and prevent it happening again

2.4 DATA PROTECTION

We respect each other's privacy at Strukton. What's private stays private. This is another area where we share joint responsibilities. Strukton does not share your personal data with third parties, even after you leave employment, unless we are legally obliged to do so. For example, we have to inform the tax authorities and the pension fund about your salary details. Only employees with special access are allowed to process your personal data. They are obliged to treat this data confidentially. We conclude processing agreements with companies that process your data on our behalf. We include clauses about, among other things, the security and confidentiality of personal data. You can read more about data protection in 'Strukton's Central Privacy Policy'.

We continuously take appropriate technical and organizational measures to protect your data, such as applying the IT Code of Conduct, using secure storage and connections, etc. The specific measures taken are based on our Strukton Data Classification guideline.

If you work at Strukton and have access to personal data of employees, former employees, or other confidential data, then we're counting on you to help us protect this data. If you're unsure whether certain information is confidential, ask your manager. If you discover or suspect that confidential data or personal information has fallen into the wrong hands or is in danger of doing so, report it immediately by sending an e-mail to the **Data Breaches and Security Incidents Reporting Centre**.



Personal data

If you work with personal data, always treat it as strictly confidential



What does this mean for you?

- If you work with personal data, always treat it as strictly confidential
- Never store personal data in a public folder. Personal data may only be sent to an external party via encrypted e-mail
- Check the Strukton Data Classification guideline to see if there are any additional security measures that you need to apply
- Do not simply provide personal data of employees to third parties. If you're unsure if you can share the data, contact the compliance officer
- Collect as little personal data as possible, never more than is actually necessary
- Delete or anonymize all data that we no longer need, and archive the data as soon as this is legally permitted
- Never store personal data on unsecured USB sticks, hard drives, or other media
- Report losses of personal data or unauthorized access to personal data immediately by sending an e-mail to the **Data Breaches and Security Incidents Reporting Centre**.

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Personal integrity



3.1 AVOIDING CONFLICTS OF INTEREST

Your life probably involves many other roles besides your professional/business role at Strukton. These could be family ties, or membership of a sports club, political party, or religious institution. You have friendships and relationships with people inside and outside Strukton, and you may even have a second job or your own company. This may result in a conflict of interest; multiple interests in a given situation, which place different, conflicting demands on you.

There's nothing wrong with a conflict of interest in itself, but it does leave you vulnerable to possible doubts about your personal credibility and to questionable decisions.



Possible conflict of interest? Be transparent and report it

What does this mean for you?

- Be transparent. If you're involved in activities outside your work for Strukton that could lead to a conflict of interest, request written permission from your manager in advance
- Do not take part in decision-making that involves even a possible conflict of interest
- If you have any doubts about a possible conflict of interest of yourself or others you work with, raise this with your manager or the compliance officer

3.2 GIFTS AND INVITATIONS

Business contacts often give each other gifts and invitations, which isn't a problem in itself. However, it's important that all Strukton employees act professionally and independently in their contacts with commercial parties and government officials at all times. Employees must make sure that no conflict of interest or even appearance of conflict of interest arises from accepting or offering a gift or invitation to or from a third party, and that there is no risk of Strukton's interests and reputation being put at jeopardy. Determining when you can or cannot give or accept a gift or invitation is something of a grey area, so check if it's appropriate on the basis of these seven conditions:

1 With the right intention

Solely to generate goodwill and show gratitude, unsolicited, and not intended to persuade or influence the recipient to make a favourable decision

2 Modest

Not of such a luxurious nature or value that it could put undue pressure on the recipient

3 Infrequent

A recurring pattern of gifts or invitations is almost never appropriate, and is a sign of exerting inappropriate influence

4 At the appropriate moment

If negotiations are being held or about to be held on commercial matters, or decisions are being made about them, giving or receiving gifts and invitations at that moment is inappropriate

5 Transparent

It must be possible to publicly disclose the gift or invitation without hesitation

6 Appropriate

The gift or invitation must be in accordance with the policies of the giver and recipient, respect anti-bribery laws, and be appropriate in the circumstances. The gift or invitation must never damage Strukton's reputation

7 Never in the form of cash or cash equivalents

The gift may never consist of cash or cash equivalents such as shares, personal discounts, etc.

Despite all our good intentions, we can find ourselves in situations where we have to accept a gift, especially when dealing with other cultures where refusal could be seen as offending the customer. Gifts worth more than €50 must be reported to the compliance officer. The officer will then make sure that the gift is clearly justified, and no appearance of undue influence lingers. It may be decided to give the gift to charity.



Gifts

If you have any doubts about the value of a gift or invitation, contact your manager or the compliance officer

What does this mean for you?

- The maximum value of promotional gifts at Strukton is €50, whether given or received
- We always pay our own travel and accommodation expenses. Lunches and dinners must not raise questions about their appropriateness due to their excessive lavishness, cost, frequency, or absence of commercial purpose
- Report all gifts or invitations with a value of more than €50 to the compliance officer. The officer will then record it in the Gift Register
- If you are in any doubt about the value of the gift or invitation, contact your manager or the compliance officer
- Permission is always required before gifts or invitations may be given to civil servants or other government officials

See our Gifts and Invitations Policy for more details.

3.3 BE CAREFUL WITH YOUR COMMUNICATIONS

Since you are an employee of Strukton, it's important to remember that what you say and do can affect Strukton's name and reputation. Always express yourself respectfully, honestly, and sensibly, whether in an e-mail to a colleague, app messages, social media posts, or presentations. For more information, see our social media policy. Always think about who can see your messages and the impressions you'll leave behind. If Strukton or its reputation are put at risk, do not send the message or post the comment. If in doubt, contact the lawyers in your business unit or the Corporate Communications department.



What does this mean for you?

- If you send e-mails, text messages, or other communications in the context of your job at Strukton, keep it businesslike and respectful, and stick to the facts. This applies regardless of whether it involves external parties or colleagues
- Be careful when regularly deleting files and e-mails. Documents that explain Strukton's dealings can be useful, and missing documents can even look suspicious. As a rule, save all relevant data for seven years after the end of an assignment
- Use the internet and social media carefully and sensibly. You must also respect general standards of decency and this Code of Conduct online
- If you come across negative messages about Strukton that you think carry weight, don't respond to them personally but report them to the Corporate Communications Department or Communications Department at the company where you work.
- If a journalist approaches you about the situation at Strukton or a project, always contact a Strukton spokesperson first. The same applies if some other outsider wants information about the situation at Strukton or a project, and you're unsure about what you can or cannot say; always contact a Strukton spokesperson first.

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Business integrity



4.1 ADMINISTRATION, INVOICE PROCESSING AND FRAUD

Strukton has to have its administration in good order at all times in order to operate successfully. For this reason, we have procedures in place that ensure that the administration always provides a complete, accurate, and transparent picture of what's happening at Strukton. By following these procedures, you contribute to Strukton's success and viability in the long-term as a place of employment.

Record transactions

Transactions with business contacts are always recorded in the administration in accordance with the procedures. Our invoices comply with the law and normal business practice.

Adjust an invoice?

Sometimes, a customer or supplier asks us to adjust an invoice. We can only do this if the adjustment is based on and corresponds to the actual situation. An adjustment in the books that isn't linked to what really happened damages clarity and raises questions. Don't let yourself

be persuaded to make these kinds of adjustments, and keep each other alert; if you come across an invoice that doesn't seem right, discuss it with the colleague in question, your manager, or the compliance officer.



Some of the things that are not allowed:

- Creating or charging a false invoice
- Creating a ghost invoice or second invoice with a different total amount than the original, correct invoice
- Selling left-over materials (steel, wood, etc.) from projects without confirmation of receipt and/or invoice
- Colluding with suppliers to charge a customer, for whom work is carried out on the basis of a detailed cost breakdown, a higher amount than agreed with that customer, for example by using multiple quotes

Fraud

Strukton has zero tolerance for fraud, and makes every effort to prevent fraud through its anti-fraud policy. If fraud is detected, disciplinary measures will be taken. By fraud, we mean all forms of deception or deceit that are intended to unfairly advantage the person committing the fraud or fellow perpetrators. Fraud includes acts such as falsifying data, theft, and unauthorized sharing of customer files. There are also less obvious forms, such as incorrectly dating a document. Strukton also wants to prevent criminals from using the organization to launder criminal proceeds by making purchases from us or through us.

4.2 PREVENTING BRIBERY AND CORRUPTION

Strukton does business honestly, free of corruption and bribery. We do not give or accept anything of value with the intent to encourage inappropriate behaviour or to gain an inappropriate advantage. Sometimes, we operate in markets where doing business with integrity can be challenging, especially if our competitors' ethical standards are lower than ours. Nevertheless, Strukton always does the right thing and acts in the right way, irrespective of where it's doing business..

We want to avoid any conflict of interest, even an appearance of one. Strukton is very willing to help the communities in which we work, for example by giving guest lectures or contributing to social

initiatives, but this must never be the result of external pressure. The charity can then act as a cover for corruption. It's important to be completely transparent in projects for charities, and stay within customary market practices and Strukton's rules. Donations to politicians or political parties are not part of Strukton's policy, either inside or outside the Netherlands.

In some countries, officials request a small fee (grease money) for things such as facilitating a visa application or customs clearance of goods. Strukton does not participate in this under any circumstances. The temptation to give in may be great, especially if meeting deadlines is in jeopardy, but we never be a party to this dishonest practice. In any case, remember that the costs of a

minor delay are irrelevant compared to the enormous fines that Strukton then risks, and the prison sentences that those involved may receive.

On top of this, there are consequences of reputational damage, and life for other employees is made more difficult. These practices are not only totally at odds with our values, they are almost universally illegal.



Donations

Be completely transparent when it comes to sponsorship and donations for charities. Record everything openly and honestly

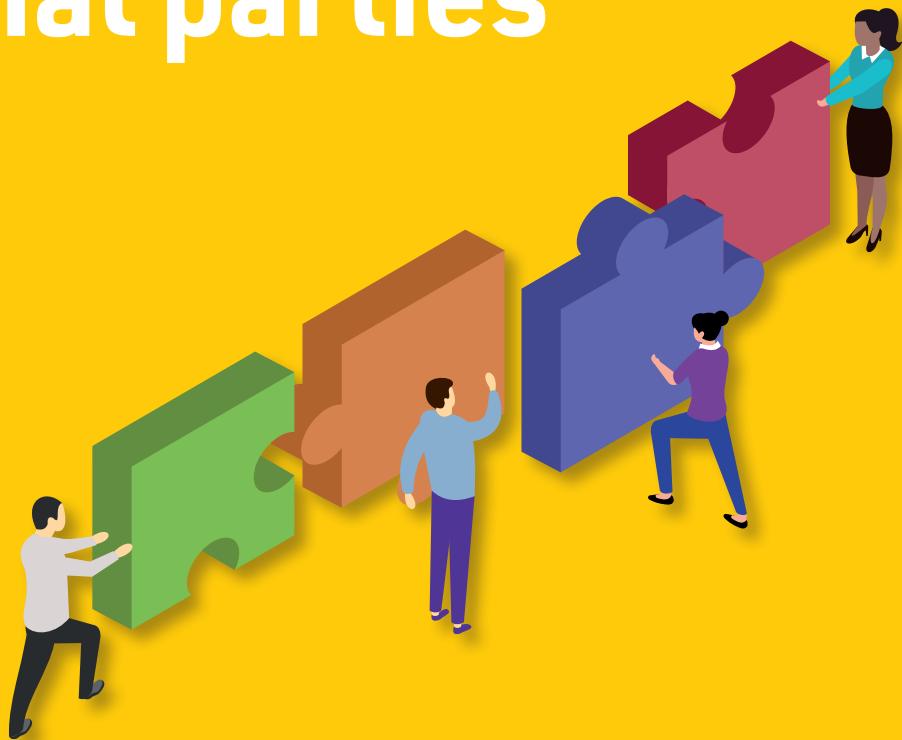
What does this mean for you?

- Never receive, accept, give, or promise anything of value with the intent to encourage inappropriate behaviour or to obtain an inappropriate advantage
- Never make or offer unofficial payments to a government official or public law institution to facilitate an administrative process
- Be completely transparent when sponsoring and donating to charities. Record everything openly and honestly in the books
- Do not use your role at Strukton to make political donations
- Not sure? Consult your manager or compliance officer
- Do you suspect corruption? Then you are obliged to report this in accordance with our Strukton Reporting Procedure.

For more details, see our anti-corruption policy.

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Working with external parties



5.1 DEALING WITH CUSTOMERS

Strukton's customers are the organizations we supply services or goods to. We also consider parties that are directly involved in this, such as consultants, architects or project developers, as our customers. We strive for an open, transparent, and businesslike relationship with our customers, and do everything we can to fulfil the business agreements we make with them.

At Strukton, we are careful about entering customer relationships. We take our own objectives into account in terms of corporate social responsibility. See our 'CSR policy statement'.

If the customer asks something from us, we do everything we can to make it happen, but we never go so far as to break the law or breach our own standards as a socially responsible company.

Customers and information

In the context of our relationships with our customers, we store sensitive commercial data about them in our computer systems, including what we have supplied to them and the price. We treat this data with care, to avoid it ending up in the wrong hands.

Private deliveries to customers

Sometimes, customers ask us to do something for them privately, which is perfectly fine in itself. However, if a delivery we make for someone privately can influence the business relationship

that we have or will have with this person in the future, it's a problem. For example, if Strukton only receives orders from someone if we're also prepared to do something for this contact privately. We must never put ourselves in a situation that gives even a mere appearance of engaging in corruption.

If Strukton supplies materials or services to private individuals, the invoice will also be addressed to this private individual. Normal terms and conditions and prices always apply to these deliveries.

5.2 DEALING WITH SUPPLIERS

Our suppliers are the companies Strukton purchases products or services from. Strukton is careful about entering into relationships with suppliers. We take our own objectives and principles into account when it comes to health and safety and CSR. See our CSR policy statement and our Supplier Code of Conduct

Suppliers and commercially sensitive information

Our suppliers hold information about Strukton that is commercially sensitive; how much of their product we buy, at what price, any discounts we have negotiated, etc. They may also hold this type of information about our competitors. Their position could, therefore, serve intentionally or unintentionally as a

channel for commercially sensitive information.

For this reason, be careful about sharing information with suppliers unnecessarily.

If you deliberately 'leak' information to the competition via the supplier, you can be punished. If you find out anything about competitors through suppliers, contact the compliance officer before you do anything about it.

Private deliveries by suppliers

If a Strukton employee buys materials or services from a supplier for private use, the associated invoice must be addressed to this employee personally. Normal terms and conditions and prices always apply to these deliveries.

Consultants

When bidding for contracts, Strukton often engages consultants, either because of the benefits they bring or because it is mandatory. These consultants can be intermediaries, representatives, or companies (law firm, accounting firm, consultancy firm etc.). They are often in contact with the customer/potential customer, relevant government agencies, and other parties.

We must take care to ensure the consultants engaged by Strukton do not act in ways that conflict with our Code of Conduct, such as giving or accepting money or gifts. We have to screen them carefully in advance, and then closely direct their actions. For some projects, independent supervision is a good idea. If you have any questions about this, contact the compliance officer.

5.3 DEALING WITH COMPETITORS

Like any healthy company, Strukton wants to beat its competition, but only if this can be done fairly. For this reason, we do not enter into agreements with competitors that restrict, distort, or prevent competition. In addition, we do not adapt our commercial activities to align them with competitors that would restrict competition in any way. Making agreements with competitors on the following therefore goes against our Code of Conduct:



Agreements

The following agreements with competitors are considered anticompetitive and always prohibited:

- Bids for tenders
- Prices we charge to customers
- Not bidding for certain tenders
- Discounts that we grant
- Price formulas that we use
- How and when we update prices
- Dividing orders or customers between each other
- Working together against a third competitor
- Jointly boycotting a specific customer
- The geographical area in which we are active
- The products we supply

Sharing information with competitors

Discussing general market trends with people from the sector, for example at trade fairs, is not a problem in itself. It does become a problem if more specific information is shared that can have a negative impact on the free market. We only discuss commercial matters such as prices or other conditions with clients.



Do not share information with the competition

if this distorts, restricts, or prevents competition

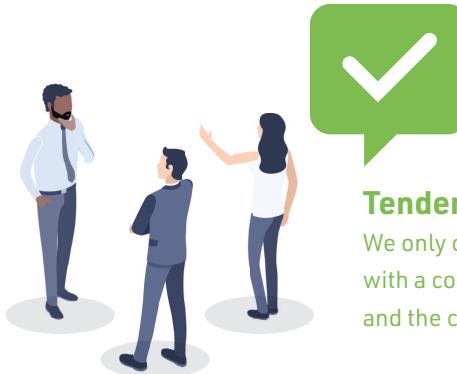
What does this mean for you?

- Do not discuss prices, discounts, delivery conditions, or other commercial topics with competitors or their employees
- Do not participate in meetings where competitors or their employees discuss their bid price for a tender
- Never discuss our expectations with regard to future price trends with competitors or their employees
- If a customer purchases products from us to resell, never impose a minimum sales price on the customer

Tenders

The rules are completely different if we form a partnership consortium with a competitor to carry out an assignment. We can decide to do this if Strukton does not have all the required expertise in-house, or for other reasons, such as risk spreading. However, all this must be done openly, and the customer must authorize it.

Strukton complies carefully with European and national antitrust laws. If we register for a tender, we do not discuss it with competitors. Strukton never concludes contracts on the basis of agreements prohibited by antitrust rules. These contracts are not legally valid.



Tenders

We only carry out an assignment together with a competitor if it's completely open and the customer has authorized it.

What does this mean for you?

- Never make agreements with competitors, and do not talk to competitors about whether to register for a tender
- Never make agreements with competitors about calculating fees in respect of tenders
- If Strukton bids for a tender, do not discuss the tender with competitors

6 Social responsibility



Our activities have an enormous impact on society. On the one hand, this is positive, because we focus on sustainable infrastructure, including rail, the most sustainable form of transport. On the other hand, there are less positive impacts, because of the raw materials we use, the substances we emit while carrying out our work, the waste we generate, and the negative influence we sometimes have on biodiversity. We want to limit or neutralize our negative impact where possible.

We have a significant social role in creating and maintaining safe and accessible infrastructure and a sustainable living environment. This demands us to be highly responsible, and involves many opportunities to enhance sustainability. Working on long-term corporate social responsibility (CSR) is therefore an integral part of our business.

We involve clients, suppliers, and partners in this, so the entire chain is onboard.

6.1 DOING BUSINESS IN OTHER COUNTRIES

Strukton's rules apply across the world

The rules and customs in other countries may differ from what we're used to, and customers, employees, governments, and other stakeholders may have different expectations. However, wherever you work on behalf of Strukton, we expect you to adhere to the principles and rules applicable at Strukton; including this Code of Conduct.

If even stricter standards apply in an area of another country where you are working, you must comply with them.

Trading restrictions and sanctions

Trading restrictions and sanctions may apply against certain individuals, companies, and countries. Strukton only does business in countries and with countries and business contacts if no trading restrictions or sanctions apply.

Human rights

Human rights are basic rights and freedoms to which all people are entitled. Wherever Strukton is active, we respect internationally accepted human rights. In line with the UN Guiding Principles on Business and Human Rights, we have incorporated these principles into our Code of Conduct on Doing Business with Integrity and our daily business activities.