



Code of Conduct
Brunel International N.V.

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Brunel is an international commercial service provider specialising in the flexible deployment of knowledge and resources. Brunel's range of specialist fields covers the disciplines of energy, engineering, ICT, legal, finance and insurance & banking. The services are provided in the form of temporary placement, project management, recruitment and consultancy.

Brunel safeguards the continuity of the company and works towards achieving – in both the short and long term – a healthy return on capital, which is proportionate to the degree of risk within the sector. The company sees clarity and transparency in supervision and accountability as the mainstays of proper management and business practice. Brunel has an open business culture that is characterised by professionalism and an entrepreneurial approach.

With respect to its staff, clients, investors and suppliers, Brunel considers itself responsible for compliance with the applicable national and international regulations and social standards. Integrity is vital for building and maintaining the company's reputation.

In the performance of their activities, Brunel staff members are required to avoid the entanglement of interests between business activities and personal (financial) concerns.

The company's financial and operational accounting systems, including the underlying documents, must accurately represent and account for the nature of the transactions performed.

The applicable national and international labour standards must be observed within the company. Human resource management is conducted on the basis of individual staff members' capacities, and personal development is encouraged.

Improper conduct, such as discrimination, intimidation and misuse of authority, is not tolerated. As far as possible, action is taken to prevent moral dilemmas in the execution of tasks, and suitable solutions are sought in the event that such situations do arise.

Brunel only conducts business with reliable parties and takes their needs and interests into account as far as possible in all aspects of the business relationship. Honest and open competition plays an important role in this regard. Agreements must be set down in writing and complied with on a consistent basis.

Brunel aims to maintain the highest level of integrity in its relations with staff members, clients, investors and suppliers. Invitations and/or favours that could jeopardise the integrity of these relationships may not be accepted.

Any staff member who wishes to notify Brunel concerning possible incidents of non-compliance with this code of conduct, based on either reasonable suspicion or actual knowledge, should expect an open attitude. Staff members are encouraged to notify their supervisor with respect to potential irregularities of a general, operational or financial nature within the company.

The Management Board has appointed a Confidential Representative to effectively combat undesirable conduct and to make it easier for the parties involved to talk about such conduct and file an official report, if desired. The staff member and/or supervisor can meet with the Confidential Representative to discuss the situation in confidence. It will subsequently be decided in consultation whether action should be undertaken. The contact details of the Confidential Representative can be found on the Brunel intranet.

Any person who, by virtue of these regulations, receives information about alleged or actual improper conduct shall maintain confidentiality about the situation vis-à-vis third parties, unless the person is required by law to provide this information to a third party. The identity of the person reporting an incident of improper conduct will not be disclosed in any recommendations or reports arising from the report without that person's written consent.

Brunel is responsible for ensuring that any staff member who files a report at Brunel in good faith is not treated unfairly in any way as a result of that action. Nor will the position of the Confidential Representative be damaged in any way as a result of the performance of his/her activities by virtue of these regulations.

Brunel is responsible for compliance with this code of conduct. All requests, suggestions and complaints concerning these regulations from staff members will be taken into serious consideration.