

ARCADIS NORTH AMERICA

CODE OF CONDUCT FOR THIRD PARTIES, INCLUDING SUPPLIERS, CONTRACTORS, CONSULTANTS AND OTHER BUSINESS PARTNERS

A Message from Arcadis

Arcadis is committed to meeting the highest standards of business conduct in everything we do, including our dealings with suppliers, contractors, consultants, and any other business or teaming partner (collectively "**Suppliers**"). Arcadis bases its Supplier relationships on safe, lawful, efficient and fair practices, and Suppliers must adhere to all applicable legal and regulatory requirements in their business relationships as set out in this Code of Conduct (the "**Policy**") in connection with their activities for or dealings with Arcadis.

The Procurement team at Arcadis will perform our duties with a commitment to integrity, and we will adhere to the Arcadis General Business Principles ("**AGBP**"). The AGBP details all Arcadians' commitment to working to the highest ethical and professional standards.

The Arcadis commitment to "improve the quality of life" extends to our supply base. We expect our Suppliers to conduct their operations in a socially and environmentally responsible manner.

Suppliers are responsible to ensure that they and their employees, workers, representatives, and lower-tier suppliers or subcontractors comply with the standards of conduct set out in this Policy and in other contractual obligations to Arcadis. Contact the Arcadis manager you work with or Procurement.ANA@arcadis.com if have any questions about this Policy or the standards of conduct all Arcadis Suppliers must meet.

This Policy draws upon several Arcadis policies, principles, and practices. As a Supplier, you are expected to directly access and familiarize yourself with the following Arcadis policies:

[Arcadis' General Business Principles](#)

[Arcadis Global Sustainability Policy](#)

[Arcadis Human Rights and Labor Policy](#)

Responsibilities of Arcadis Suppliers

You, as a Supplier to Arcadis, agree:

Health and Safety: In our AGBP, we commit to providing a healthy and safe work environment for all our employees. To that end, our global health and safety vision and policy reflect a proactive risk and behavior-based approach that integrates health and safety into our culture, values and the way we do business. Please see the AGBP for more information.

We expect our Suppliers to comply with applicable environmental, health and safety laws and regulations and, as applicable, Arcadis contractor Health and Safety requirements.

Global Sustainability: Arcadis is committed to improving the quality of life for all generations by maximizing social, economic and environmental value. It is our mission to create exceptional and sustainable outcomes for our clients in natural and built asset environments. We will do this by focusing on our clients, our operations, and our people.

We expect Suppliers to show respect for the environment and comply with applicable environmental laws. Sustainability is a core value for Arcadis and we seek supply partners who share our values.

Human Rights and Labor: Arcadis respects human rights. Arcadis is committed to improve quality of life for people touched by the projects in which we are involved. We also are committed to identify, prevent, or mitigate adverse human rights impacts resulting from or caused by our business activities before those activities start or, if they occur during the activity, through human rights due diligence and mitigation processes. We expect you as a Supplier to operate your business in keeping with these principles.

Equality, Diversity, and Inclusion: Arcadis is committed to fostering, cultivating, and preserving a culture of equality, diversity, and inclusion. Arcadis will not tolerate discrimination, harassment, or other behavior that creates an environment contrary to our Values and Behaviors (see appendix A), or that conflicts with our policies (see appendix B). Violations may result in the suspension or termination of your current and future business with Arcadis.

Arcadis North America is committed to embracing the opportunities that a diverse supply base generates for our business. Our objective is to provide all Suppliers with an equal opportunity to participate in our supply chain. Arcadis encourages Small Disadvantaged Businesses (SDB) and Minority Business Enterprise (MBE) – apply for participation in our procurement process. Our procurement processes are transparent, objective, and non-discriminatory in the selection of our Suppliers.

Supporting our Commitments to Clients: Arcadis and our Suppliers will not share or exchange any price, cost, or other competitive information, or engage in any collusive conduct with any third party, with respect to any proposed, pending, or current Arcadis procurement effort.

Integrity and Ethics: We maintain records of our transactions in an accurate and transparent manner and expect the same of our Suppliers. Arcadis and our Suppliers will not tolerate corruption, bribery, embezzlement, or fraud in any form. This includes but is not limited to the following:

Gifts or payments, in whatever form, should never be given or received where it is intended to or would appear to obligate the recipient. To avoid even the appearance of impropriety, gifts or favors of any material commercial or personal value should not be offered to or accepted by an Arcadis employee and you as a Supplier should not do so. If you are in doubt, we expect you to raise the issue with us so that the Arcadis team member with whom you are working can compliance with our Gifts and Hospitality policy.

Facilitating payments, in delivery of your duties for Arcadis are not permitted, even if local laws, custom, practice or regulations might permit such payments. A “facilitating payment” is a payment (whether in money, goods, services, barter and exchange, or any other thing of value) to a foreign official, political party, party official or similar person for "routine governmental action" which that person is already bound to perform. Examples might include, among others, processing official documentation, customs clearances, and other

matters of routine governmental actions. A characteristic of facilitating payments is that the service obtained as the result of such payment represents the legitimate function of the official concerned. Taking advantage of a formal, publicly available "fast track" procedure operated by a government department, whereby an additional advertised payment is made to expedite a process, is not a facilitating payment.

Audit: You agree that Arcadis, either by itself or through a third party, has the right to audit all communications and documentation related to the performance of your duties as a Supplier. You agree to that all such records in connection with transactions involving Arcadis, including but not limited to commercial documentation (invoices, supporting documents, etc), customs forms, or any similar documentation, submitted to Arcadis or governmental authorities, accurately describe the goods and services provided or delivered and the price thereof. You agree to ensure that all such documents, communications, and accounting are accurate and honest.

Intellectual Property: To respect the intellectual and other property rights of Arcadis and of third parties, including all patents, trademarks and copyrights.

Security and Privacy: (i) To respect privacy rights and secure the data of Arcadis employees, customers, and suppliers (collectively, "Arcadis Data"); (ii) to implement and maintain physical, organizational and technical measures to ensure the security and confidentiality of Arcadis Data in order to prevent accidental, unauthorized or unlawful destruction, alteration, modification or loss of Arcadis Data, misuse of Arcadis Data, or unlawful processing of Arcadis Data; and (iii) protect Supplier operations and facilities against exploitation by criminal or terrorist individuals and organizations.

How to Raise a Question or Concern

Subject to local laws and any legal restrictions applicable to such reporting, each Supplier is expected to inform Arcadis promptly of any concern related to this Guide affecting Arcadis, whether or not the concern involves the Supplier, as soon as the Supplier has knowledge of such an occurrence. Suppliers also must take such steps as Arcadis may reasonably request to assist Arcadis in the investigation of any such occurrence involving Arcadis and the Supplier. Supplier also must notify Arcadis of any potential non-conformance with this Policy.

To report a concern:

- Discuss with your Arcadis Project Manager; **or**
- Email Procurement.ANA@arcadis.com; **or**
- Call the Arcadis Integrity Line: +1 866-250-6706, access code 58365

Arcadis does not tolerate retaliation for reports made in good faith.

APPENDIX A– ARCADIS VALUES AND BEHAVIORS

Our culture is based on strong values and clear behaviors

Our Passion

Improving quality of life

Our Behaviors

- We value each other.
- We deliver on promises.
- We always bring our best.
- We act as one team.
- We dare to shape the future.

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Our Values

PEOPLE FIRST

We care for each other and create a safe and respectful working environment where our people can grow, perform and succeed.

CLIENT SUCCESS

We are passionate about our clients' success and bring insights, agility and innovation to co-create value.

COLLABORATION

We value the power of diversity and our global capabilities, and deliver excellence by working as One Arcadis.

INTEGRITY

We always work to the highest professional and ethical standards and establish trust by being open, honest and responsible.

SUSTAINABILITY

We base our actions for clients and communities on environmental responsibility and social and economic advancement.

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APPENDIX B – NON-HARRASSMENT POLICIES

To prohibit harassment of any **person (employee, client, subcontractor, etc.)** by another person (**employee, client, subcontractor, etc.**) based on race, religion, creed, color, national origin, sex, age, sexual orientation/transgender status/gender identity or expression, citizenship status, marital status, genetic information, ancestry, veteran status, physical or mental disability, or any other basis prohibited by law at all levels of employment.

Sexual Harassment

Sexual harassment is a violation of Title VII of the Civil Rights Act of 1964, and it is against the policies of the Company for any person to sexually harass another person by:

- Making unwelcome sexual advances or requests for sexual favors or other verbal or physical conduct of a sexual nature as a term or condition of an individual's employment;
- Making submission to or rejections of such conduct, the basis for employment decisions affecting the employee; or
- Creating an intimidating, hostile or offensive work environment by such conduct. Sexual harassment can be physical and psychological in nature. An aggregation of incidents can constitute sexual harassment even if one of the incidents considered on its own would not be harassing.

Sexual harassment does not refer to behavior or occasional compliments of a social nature. It refers to behavior, intentional or non-intentional, that is unwelcome and interferes with the work environment. Sexual harassment may take different forms. One specific form is the demand for sexual favors. Other forms of harassment include but are not limited to:

- Verbal: Sexual innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, sexually degrading words to describe an individual, graphic verbal commentary about an individual's body, and threats.
- Non-verbal: Displaying sexually suggestive objects or pictures in the workplace, graphic commentaries, leering, whistling, and obscene gestures.
- Physical: Unwanted physical contact, including touching, pinching, brushing the body, and any other type of coerced sexual activity.

Unlawful Harassment

The Company strives to maintain a work environment free of unlawful harassment. In doing so, the Company prohibits unlawful harassment because of race, religion, creed, color, national origin, sex, age, sexual orientation/transgender status/gender identity or expression, citizenship status, marital status, genetic information, ancestry, military or veteran status, physical or mental disability, or any other basis prohibited by law at all levels of employment. Unlawful harassment includes verbal or physical conduct that has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment. Prohibited behavior includes but is not limited to the following;

- Written and/or electronic form such as cartoons, e-mail, posters, drawings, or photographs.
- Verbal conduct such as epithets, derogatory comments, slurs, or jokes.
- Physical conduct such as assault, or blocking an individual's movements.

Non-sexual harassment is not limited to these examples. Non-sexual harassment includes any comment, action, or type of behavior that is threatening, insulting, intimidating, or discriminatory and affects the work environment.