PREFACE

Message from the CEO

Dear colleagues,

Fugro’s activities span the globe, on land, at sea and in the air, and enable us to respond quickly and effectively to the needs of our clients in the many and varied environments in which we operate. Our company culture represents our shared behaviours, beliefs and characteristics. We showcase it through our core values as they can guide us and improve the way we do business. We encourage and expect every employee to support our core values; we are determined to deliver, we build trust, we prepare for tomorrow, and we do what’s right.

To help navigate in an increasingly complex world, we have created the Fugro Code of Conduct (the Code). The Code explains the fundamental way we strive to conduct our business, always and anywhere and under any circumstance imaginable. The Code covers the main topics concerning business conduct in a simple framework. You can find more information in supplementary documents available on the Fugro Intranet.

The Code is the compass for all of us, no matter where we are or what role we have in the organisation. The Code is also applicable to our subcontractors and other business partners. Not only do we share a responsibility with them when it comes to work, we are also bound to ensure that together we uphold the highest standards for our conduct. Even then, it is impossible to describe every conceivable situation you may find yourself in during the course of business. If a situation appears illegal, inconsistent with our values or simply does not feel right, never proceed but voice your concern to your line manager or supervisor. Fugro has zero tolerance for any intimidation or retaliation for Speaking Up in good faith.

Work is more than just providing the best services to our clients; we also have to provide them in the right way. Welcome to the Fugro Code of Conduct - Our compass in a complex world.

Mark Heine
Chief Executive Officer
Fugro N.V.
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Fugro at a glance

Fugro goes back to 1962 when two engineers recognised the need for accurate information of the ground and the layers beneath it for the safe construction of buildings and infrastructure. They founded Fugro in Leidschendam, as the first commercial consulting engineering company in the Netherlands specialised in ground investigation and foundation advice. Over more than five decades, Fugro has become much more than a small local company in Holland. With resources that include over 9,000 employees and offices in 60+ countries, we acquire and interpret earth and engineering data and provide associated consulting services to support clients with their design and construction of infrastructure and buildings. Fugro also supports clients with the installation, repair and maintenance of their subsea infrastructure. For over 50 years clients have called upon our world-leading expertise and state-of-the-art equipment in support of their onshore, nearshore and offshore projects.

Fugro services enable clients to make responsible use of the earth and its resources. Fugro assists in the exploration, development, production and transportation of important natural resources. Technical data and information are made available to clients who design and build buildings and infrastructure so that they may do so in a safe and efficient way.

People are at the heart of our business and our clients rely on competent, well-trained and dedicated staff for their projects. The way we work and how we want to be part of society is founded in our Core Values. They provide fundamental ethical guidelines as the base for business decisions. The Code of Conduct is the translation of those values into our day-to-day business activities.

The Code of Conduct is ours. Not only is it applicable to all of us, also a large number of Fugro people have been involved bringing it to life and in-front of you. The Code is a living document. We will regularly update its content based on experience using it. We encourage you to offer your comments and suggestions or any questions you may have on code.of.conduct@fugro.com.

Our Core Values

Our values guide us in fulfilling our purpose as an organisation: together we create a safe and liveable world. Whilst each value has a distinct role to play, they are linked and equally important. Together we own our values, their sum is our collective strength as a company.

We are determined to deliver

We work together to understand what’s needed and deliver results. We have high expectations and set goals which enable us to reliably meet those high expectations. We’re proud of our track record and use communication and teamwork to consistently deliver the quality that defines our reputation. We’re united in our global drive to succeed, we take ownership and, above all, we celebrate achievements when the job is done.

We prepare for tomorrow

Our changing world is an opportunity for a better world. We’re doing our best work today while investing in tomorrow through our passion for learning and constant curiosity. With our eyes on the future, we welcome change as a catalyst for innovation and for finding new and more sustainable solutions and ways of working. More than ever, on our shared planet, preparing for tomorrow means taking the lead, improving every day, anticipating changes and proactively evolving now.

We do what’s right

Doing what’s right isn’t always easy, but it’s the Fugro way. We create a safe and respectful environment where everyone feels able to speak up, be heard and make Fugro a safe place to work. We respect and value differences and listen to alternative viewpoints, and we encourage a cross section of perspectives by taking active measures to realise a diverse, equal and inclusive workforce. Essential for growth and development, doing what’s right allows everyone the integrity and authenticity to be their best self and to go home safely at the end of every working day.

We build trust

Trust begins with open communication: we are trusted because we do what we say. We deliver on our promises and build relationships through honesty, transparency and respect. Trust is key to our success and gives us the confidence to work together to solve challenges with integrity and ingenuity. We follow up our words with actions that demonstrate our dependability and reliability; in this way, we can count on our colleagues and are trusted partners to whom clients keep coming back to achieve our mutual goal of a safe and liveable world.
Purpose and scope of our code

What is the Code all about?
The Code is an extension of Fugro’s values. The Code gives us the guidance and support we all need to conduct our business ethically, to comply with the law and maintain our reputation. These three things are vital to our success. It represents our commitment to do the right thing, including respecting the rights of others.

Why do we need a Code?
This Code should be viewed as an essential guide that will help you in critical areas of business conduct to ensure that together we comply with the law and maintain our reputation. It governs the way we work with each other and in the market place. How we manage our business internally, and how we think about, and work with, clients, partners and communities will impact our productivity, success and ultimately our reputation.

Who is the Code for?
The Code applies to all our employees and contractors for all our activities, and we encourage others who work with us to embrace the Code. Furthermore, the management of each Fugro operating company is required to implement adequate processes to inform - and where necessary educate - staff on the Code, and is responsible for fostering a culture in which the Code is applied in day-to-day business.

All of us at Fugro, without exception, are duty bound to follow and uphold our Code, and we must all remember that failure to do so can put Fugro and ourselves at risk. Put simply, failure to follow the Code is misconduct, which could result in disciplinary action and even dismissal. We should depend on it to help us make good, informed business decisions and to act on them with integrity. It is important that everyone, at all levels, familiarises themselves with our Code and complies with it. By being part of Fugro you are agreeing to uphold this commitment.

Speak Up
If you are ever concerned that the Code is not being followed, or simply feel unsure about any situation, it is vital that you speak up and ask a question, or share your concern as soon as possible.

Additional Information
We appreciate that no one is an expert in all matters and knows what to do in all situations. In some cases you may need to read additional material to understand fully what is required. Throughout the Code we will refer you to additional information with references to supporting Fugro handbooks, policies and standards.

To further enhance everyone’s understanding, throughout the Code we provide examples, such as the following, in the form of Q. (Questions) and A. (Answers).

Q: Does the Code apply to everyone in Fugro?
A: The Code applies to everyone working for Fugro worldwide regardless of location, role or level of seniority. We expect those who work with Fugro, and for Fugro, to act in accordance with the principles of the Code and our relevant policies and standards. Non-wholly-owned subsidiaries and joint ventures which we control are required to have a Code of Conduct that is aligned with Fugro’s Code. In joint venture relationships that we participate in, but do not control, we will encourage our partners to meet the requirements of the Code.

Q: How should I handle situations not covered by the Code?
A: You may face situations which are not explicitly covered by the Code where you are unsure of the correct course of action to take. In such situations it can be helpful to ask yourself a few questions:

- Is the action legal?
- Does it feel right?
- Does it support Fugro’s values?
- Could it expose Fugro to unacceptable risk?
- Does it comply with the spirit of the Code, and our policies and standards?
- How would this action appear to others – your line manager, colleagues or family?
- Would you be comfortable if you were to read about it in a newspaper?

If you still have concerns, seek guidance – from your direct manager or supervisor or a local Human Resources representative, an (local) in-house lawyer, a (local) Confidential Advisor or the Global Compliance team.
To maintain our high standards, we encourage you to speak up if you have concerns about any breaches of this Code of Conduct or suspected irregularities. When you share your concerns with us, you enable us to take action and correct matters if required. Together we create a safe, healthy, productive and positive working environment.

Our Commitment

• Offer adequate channels and procedures to report suspected irregularities, including an external reporting line which facilitates anonymous reporting (www.convercent.com/report).
• Welcome reports about any breaches of the Code or suspected irregularities made in good faith.
• Ensure that there will be no retaliation or intimidation of employees for reporting suspected irregularities in good faith.
• Provide details in Fugro’s Speak Up Procedure on how to raise a concern or file a Report about a suspected violation of local or international laws, the Code, or other Fugro policies or procedures and on how Reports are handled.

Your Commitment

• To raise any concern you have through your manager, his/her manager, a (local) in-house lawyer, HR representative or (local) Confidential Advisor. You can also send an email to code.of.conduct@fugro.com or use the external reporting line which offers the possibility to report anonymously (www.convercent.com/report).
• To report suspected violations of applicable local or international laws, the Code or any other Fugro policy or procedure.
• To report suspected unethical behaviour related to Fugro or any of its contractors, clients, suppliers or other third parties Fugro works with.
• To report questionable financial accounting irregularities or breaches of key internal controls.

WE HAVE A RESPONSIBILITY TO SPEAK UP

We believe that it is important that our employees are offered adequate procedures for reporting suspected irregularities of a general, operational or financial nature in any Fugro operating company, worldwide, and that we all feel secure in the knowledge that there will be no intimidation or retaliation. We all need to have the courage to speak up and always strive to do the right thing.

Speak Up Procedure

Q: I feel I should talk to someone at Fugro, but I am anxious about it. My direct manager or supervisor told me to do something I feel is dangerous and may even be illegal. I am afraid that there might be repercussions and they could make life difficult for me if I raise this. What should I do?

A: It is important that you share your concerns about this potentially serious matter. In this case raising it with your line manager appears inappropriate so raise it with a local HR representative, an (local) in-house lawyer, or a (local) Confidential Advisor. You can also send an email to code.of.conduct@fugro.com or use the external reporting line which offers the possibility to report anonymously (www.convercent.com/report). And in the unlikely event of anyone retaliating against you, you should raise this promptly. Retaliation will not be tolerated and swift action will be taken if you have reported an incident in good faith.

Q: I am concerned a senior manager in my company may have awarded a supplier contract to a company owned by a friend and he did not consider price or their ability to do the work correctly. What should I do?

A: You should report this incident to your line manager or supervisor. If however this is not possible, is inappropriate or if you are dissatisfied with the outcome, you should raise the issue with a local Human Resources representative, an (local) in-house lawyer, or a (local) Confidential Advisor. You can also send an email to code.of.conduct@fugro.com or contact the independent external reporting line (www.convercent.com/report). Per Fugro’s Speak Up Procedure, we will treat your complaint confidentially and not tolerate any retaliation against you by any member of the company if you have reported an incident in good faith.

Further information can be found in the Speak Up Procedure available under the Compliance portal on Fugro global intranet Insite and on fugro.com.
WE VALUE OUR PEOPLE

Our employees are one of our greatest strengths. We value diversity of people and thought, and we value every employee as an important member of our Fugro team. We aim to make sure that everyone at Fugro and everyone we come into contact with, is treated with fairness, respect and dignity, and never unfairly discriminated against. It is our intention that everyone everywhere goes home safe, every day.

WE VALUE OUR PEOPLE

Equal Opportunity

We believe everyone should have equal opportunity. We recruit, select, develop and promote our people on qualifications, performance and merit. As good corporate citizens of the communities in which we work, we abide by all applicable civil rights laws, and strive for a workplace which is free from any forms of discrimination, harassment or bullying.

Our Commitment

- Respect the rights of our employees and provide them with good and safe working conditions, and fair terms and conditions of employment.
- Promote the development and best use of the talents of our employees; create a work environment where every employee has an equal opportunity to develop his or her skills and talents, and advance within the organisation.
- Encourage the involvement of employees in the planning and direction of their work; provide them with channels to report concerns.
- Not tolerate employees being subjected to physical, sexual, racial, psychological, verbal, or any other form of discrimination, harassment, intimidation or bullying.
- We value all our people and respect their diversity, no matter who they are and what their background is.

Your Commitment

- To ensure you do not discriminate against any individual or group based on factors which are irrelevant to their ability to do their job.
- To base hiring, evaluation, promotion, development, discipline, compensation, and termination decisions on qualifications, merit, and performance and business considerations only.
- To never engage in any form of discrimination, harassment, intimidation or bullying, or any behaviour that could be viewed as offensive, intimidating, malicious or insulting.
- To support and promote Fugro’s commitment to diversity, inclusion, individual contribution and a fair and harassment free workplace.
- To ensure that clients, suppliers and other business partners are aware of Fugro’s commitment to equal opportunity.

Q: I’m a female engineer and I’d like to work in the offshore industry, but I believe it is a male-oriented environment. Would I get a fair opportunity in such an environment?

A: Fugro is interested in the knowledge, skills and abilities of applicants for jobs. This means we want to hire, develop and promote talented individuals who are well qualified for our positions, regardless of gender.

Q: As a substantial amount of travel is required for the vacancy in my team, I believe it would not be suitable for a single parent. This is not about prejudice, but practicality. Am I required to interview candidates who are single parents?

A: You are required to interview all candidates whose qualifications meet the requirements of the job – not on the basis of personal opinion. Making assumptions like this violates our principles and may even be against the law. Just as important, failing to interview suitably qualified candidates risks missing out on appointing the best person for the job. At Fugro, equal opportunity means equal opportunity for everyone.

Further information can be found under the HR portal on the Fugro global intranet Insite.
WE VALUE OUR PEOPLE

Health, Safety, Security and Environment (HSSE)

Fugro is committed to providing a healthy, secure and safe workplace and to protecting the environment in accordance with applicable laws and our Health, Safety, Security and Environmental (HSSE) Policy. Our commitment is based on the conviction that incidents are preventable.

In order to keep pace with the growth and diverse nature of the organisation, we understand the need to maintain these standards by continuing to manage HSSE risks, develop policies and procedures and seek improvement in performance. HSSE responsibilities are integrated in the way in which Fugro conducts its business. Through observance and encouragement of these values, we assist in protecting the environment and the overall wellbeing of all our stakeholders, specifically, our employees, clients, subcontractors, and communities.

Our Commitment

- Consult, listen and respond openly to employees, clients, suppliers, trade bodies and regulators.
- Strengthen our HSSE culture through leadership, stakeholder engagement and effective policy implementation.
- Provide appropriate HSSE information and training for all employees.
- Address the environmental and health impact of our operations by reducing waste, discharges and by using energy efficiently. We strive to be good citizens in every community in which we operate.
- Work with our joint venture partners, suppliers, clients, regulators and competitors to raise the standards of HSSE of our industry.
- Openly report on our HSSE performance.

Your Commitment

- To lead by example and take responsibility for yourself and others to work safely.
- To follow the Fugro HSSE Policy, procedures, instructions and rules.
- To carefully plan your work to prevent unsafe situations.
- To learn from your experiences to improve our HSSE performance.
- To encourage and reinforce safe behaviours and to intervene in unsafe work practices.
- To promptly report incidents, near misses and hazardous conditions or situations.
- To make sure you know what to do if an emergency occurs at your place of work.

Q: Will I be penalised if I stop the work when I have concerns about health, safety or environmental damage?
A: No. All employees and our contractors are empowered to stop work if they consider the activity or location to be unsafe and/or could damage their health or the environment.

Q: As part of our quarterly meeting agenda, we organised an offsite sports activity for the participants after work hours, and one of our employees suffered a bone fracture while participating. Do I need to report this as I am concerned that it will affect Fugro’s safety statistics?
A: Yes, even though the activity was after hours it was part of the meeting schedule, and those attending the meeting were expected to participate. Most importantly we need to learn when things go wrong in order to prevent their occurrence in the future. As such, the injury should be reported.

Q: Why should we spend so much time talking about health and safety when incidents don’t happen that much anyway?
A: Incidents shouldn’t happen at all and by taking the time to talk about how we can all work more safely, we can prevent future incidents.

Q: We suffered a small uncontaminated oil spill of just a few liters. Should I report it?
A: Yes. You should report any spill or release of oils or chemicals which has the potential to damage the environment. Tell your line manager straightaway so that action can be taken, report it as needed and investigate the causes to prevent similar incidents happening in the future.

WE VALUE OUR PEOPLE

Drugs and Alcohol

Personnel who are under the influence of drugs, alcohol or other substances pose a danger not only to themselves but also to others. In order to eliminate any additional risk to the health and safety of all personnel at the work location, Fugro’s policy is based on zero tolerance towards working under the influence of and the use of substances in the workplace. Any individual under such influence whilst on duty, at any of the Fugro’s work locations or elsewhere, shall be considered as committing a serious breach of discipline.

Our Commitment

- Aim to prevent drug, alcohol and substance abuse, identify personnel with a problem at an early stage and provide assistance. Where appropriate we will provide support to enable return to effective work.
- Proactively monitor compliance and take appropriate disciplinary action where necessary.

Your Commitment

- To ensure that your judgment and performance at work is never impaired by drugs, alcohol or other substances.
- To observe the Substance Abuse Policy and comply with all instructions relating to that policy and its implementation.
- To report any concerns about substance abuse in line with Fugro’s policy.
- To inform your manager if you are taking any medication (whether prescribed or bought “over the counter”) which may affect your ability to work safely.
- To behave in a manner acceptable to local laws and customs when on assignment for Fugro.
- Never drive while under the influence of alcohol, drugs or any other substance.
- Uphold high standards of personal behaviour while in the care, custody and control of Fugro.

Q: Some time ago, we joined for a tender review meeting and stayed in a hotel. Some of the Fugro group went to the bar and one of my colleagues drank too much and behaved inappropriately at the hotel staff. I was embarrassed and also concerned that he would not be fit for the meetings the next day. Should I keep quiet about this?
A: No, you should not. Not only is his behaviour not in line with Fugro’s values, it could also damage the reputation of Fugro or have serious impact on his judgment going into the meeting the next day. You should report this to your line manager and the project team leader.

Q: One of my colleagues is regularly calling in sick, sneaking out or not focused on his job. He insists that he is fine but I have reasons to suspect that he has an alcohol or substance abuse problem. I want to help but am worried that it’s none of my business. What should I do?
A: This can be highly uncomfortable and you would probably hope that you would not have to bring it up and the situation will resolve itself. However, this is likely not in the best interests of the individual or Fugro. Discuss your concerns with your line manager or HR department to help avoid problems getting bigger.

Further information can be found under the HSSE portal on Fugro global intranet Insite.
The giving or receiving of bribes in any form is unacceptable. Bribery includes the offering, promising, giving or receiving of anything of value to or from a public official or a private individual with the intent to obtain or retain business or gain an unfair advantage including influencing pricing, selection procedures or decisions of government, corporations or Fugro. No bribe should ever be offered and any demand for a bribe must immediately be refused. Breaching anti-bribery and anti-corruption laws is a serious offence. Companies and individuals breaching these laws may be punished by fines, and individuals may also face imprisonment. Most countries have laws prohibiting bribery and corruption that also cover actions carried out beyond the country's borders. Everyone at Fugro must comply with these laws. We need to be aware that even something that can be perceived to breach anti-bribery or anti-corruption laws can severely damage our reputation.

Our Commitment

- Not engage in bribery or corruption in any form or for any reason.
- Ensure that business decisions are based solely upon legitimate business considerations.
- Not engage in facilitating payments - small payments to government officials as individuals to expedite or secure routine governmental actions to which you are entitled such as releasing goods held in customs. Only in situations where there is an imminent and serious threat to you or your colleagues’ personal health or safety a facilitation payment may be acceptable in order to get you out of that situation as long as you report it to your manager and to the Global Compliance team immediately after the incident having occurred.
- Ensure that all business partners who represent or act on behalf of Fugro confirm to comply with applicable bribery and corruption laws and our policy. Where appropriate, they must show that they have in place appropriate programmes to prevent bribery.

Your Commitment

- To never offer or accept any bribe or inducement which may improperly influence or appear to influence your actions or those of a third party.
- To know where and how cash and any other payments that you might approve will be used.
- To ensure that no third party, such as an agent, adviser or business partner passes on or accepts a bribe.
- To ensure that any gift, favour or hospitality is made voluntarily, and is not of such a value that it may influence a business decision.

Q: I was told I have to pay a “fee” to a minor government official to get our equipment cleared through customs. We are under pressure to get the project started as soon as possible and it’s not against the law in this country. What should I do?

A: Fugro must not provide facilitating payments to officials to carry out their official duties. In most countries where we are based it is illegal to pay ‘facilitating’ or ‘grease’ payments. Even in countries where these payments are not against the law, Fugro strictly prohibits them. Seek the advice of your line manager or the legal team to determine legally acceptable alternatives to secure the release of the equipment.

Q: We need to obtain permits from a foreign government to allow us to operate our equipment in certain regions. I have been told that the best way to get the permits I need is to hire a consultant or agent to take care of it for me. I have talked to an agent and he has asked for a substantial retainer. As long as we get the permits, do I need to worry about what he does with the retainer?

A: Yes, you have a responsibility to ensure that proper due diligence is carried out before hiring anyone who will be interacting with government officials on Fugro's behalf. Before the consultant or agent is hired, it is essential that you speak with the Global Compliance team in order for proper due diligence to be carried out and for appropriate contracts to be put in place.
Conflicts of Interest

We respect the privacy of everyone who works for Fugro and are not normally concerned with what people do outside of work. However, conflicts of interest can happen if an employee’s personal, social, financial or political activities interfere, or potentially interfere, with their responsibilities to Fugro. Even the appearance of a conflict of interest can be damaging to our reputation and needs to be addressed.

Our Commitment

• Be vigilant and ensure that the company avoids any situation that could be construed as a conflict of interest.

Your Commitment

• To avoid situations where your personal interests may conflict with those of Fugro.
• To always disclose any conflicts of interest or potential conflicts of interest to your line manager, preferably in writing.
• To keep a record of any conflicts of interest that have been notified to us and any agreed actions.
• To never use your position within Fugro for personal benefit or to benefit a relative or friend.
• To withdraw from any decision-making that creates or could be perceived to create a conflict of interest.

Q: A colleague’s daughter has just joined Fugro and has been assigned to our work group. Is it a conflict of interest to work with her on the same project?

A: Unless local policy prohibits it, relatives can work in the same operating unit. The only proviso is that no relative can ever be in a position to either hire, supervise, affect the terms and conditions of employment or influence the management of another relative.

Q: My spouse is an officer in a company that does business with Fugro. In my job at Fugro, I also have contact with that company from time to time. Is this a problem?

A: Every case is different. You need to talk it through with your line manager so that any issues can be anticipated and avoided. Remember, all actual or potential conflicts must always be disclosed to Fugro.

Q: Do conflicts of interest include people I have close personal relationships with, as well as actual relatives?

A: Yes. The Code covers any close relationships that may create an actual or apparent conflict of interest. It does not list every activity or relationship that could create a conflict. However, it does tell you when you should be concerned; that is, if any activity or relationship interferes with your objectivity and duty to Fugro. Should you have any concern at all about any personal relationship, raise it with your line manager without delay or your local HR.

Insider Trading

Trading on the basis of ‘inside information’, often known as ‘insider trading’ is a criminal offence in the Netherlands and many other countries, and could lead to fines, dismissal and imprisonment. Information about any listed company which is not generally available to the public and which could affect the market price of the shares/securities of that company is inside information. This applies to any information that relates directly or indirectly to Fugro or its shares/securities or to any other publicly traded company or its shares/securities. Material information includes information that may have or is likely to have a significant effect on the price of shares/securities. A matter is also material if there is a substantial likelihood that a reasonable person would consider it important in making an investment decision. The following are just a few examples of information that would be considered inside information prior to it being released to the public:

• Knowledge of Fugro’s results.
• Knowledge of acquisitions, divestments, mergers or joint ventures.
• Litigation issues and knowledge of significant projects.
• Anticipated significant action by governments.

Your Commitment

• Publish price sensitive information when required.
• Not take part in market abuse – spreading false information or engaging in other activities designed to manipulate the price of publicly traded shares/securities.

Q: Can I buy shares in a client’s company?

A: No. You cannot buy the client’s shares until the information you have is publicly available. In this situation you currently have ‘inside information’ which was given to you in confidence and has not been publicly disclosed. This is information that a reasonable investor would probably consider important in making an investment decision about the company.

Q: Can I sell Fugro shares for personal reasons, (e.g. to raise money to put down a deposit on a house) when I have access to potentially insider information?

A: No. You still cannot sell, even if you wish to sell for a reason unconnected with the information you have. You must wait until the information has been disclosed to the public.

Q: I know that I am at times in possession of inside information and therefore I am at times restricted in buying or selling Fugro shares. However, my brother has mentioned that he’d like to buy some shares in Fugro. I never talk to him about my work so is this okay?

A: You should be cautious in this situation and be confident that there is no information you have ever disclosed to your brother which could be viewed as inside information. You should discuss the situation further with Fugro’s Company Secretary.

Further information can be found in the Insider Dealing Policy available under the Insite portal on Fugro global intranet Insite or on Fugro’s website.
Fugro believes in honesty, integrity and fairness in all aspects of business and we expect the same in the relationships with all those with whom we do business. Our companies are encouraged to compete vigorously for business, but always fairly, in compliance with the law and on the merits of our products and services. All business transactions on behalf of a Fugro company must be reflected accurately and fairly in the company accounts in accordance with established procedures which are subject to audit and disclosure.

WE OPERATE WITH INTEGRITY

Accurate Reporting and Accounts

All transactions must be recorded in a way which accurately, clearly and unambiguously describes the nature of the transaction, and all business records, accounts and reports to government agencies and others must be prepared with care and honesty. Records are valuable company assets and must be properly managed. We must be able to retrieve records quickly and reliably. When a record’s retention period is over, appropriate disposal is required. A record contains information that is evidence of a business activity or required for legal, tax, regulatory and accounting purposes, or is important to our corporate memory. It is the content which determines a record not its format. Records include contracts; audit reports; financial information; product specifications; corporate policies, guidelines and procedures; expense claims; minutes of meetings.

Our Commitment

• Operate in accordance with generally accepted principles of corporate governance.
• Provide reliable and true information on Fugro activities and financial situation at prescribed intervals (monthly/quarterly).
• Not permit unlawful, false or misleading entries in our records.
• Not destroy or alter a document with the intent of impairing its integrity or availability in any internal or government investigation or legal proceeding.
• Not create or maintain unrecorded or undisclosed funds, assets or accounts nor make any unrecorded or undisclosed payments.

Your Commitment

• To create and maintain complete and accurate accounts, data and records.
• To be vigilant in identifying and reporting any potential misrepresentation of Fugro’s accounts, data or records, or any incidence of potential fraud or deception.
• To demonstrate integrity and diligence in submitting your travel and expense claims and in approving those of others.
• To ensure that any contractual commitments which we make on behalf of Fugro are within the scope of your (delegated) authority.

Q: My boss has asked me to record an unconfirmed project award in the quarterly report to meet our targets, but the project will not start until after the quarter ends. Should I do what he asks?

A: No. You must always record costs and revenues in the correct time period. Reporting a project that is not yet started would be a misrepresentation. It could be fraud. You need to discuss your concern with your line manager. If you are not comfortable with his or her approach, seek help from Finance, a local Human Resources representative, an (local) in-house lawyer, the Global Compliance team or (local) Confidential Advisor.

Q: I have been travelling a lot with work recently and I’ve lost some of my receipts. I’ve heard of colleagues in the same position adding a few fictitious receipts of the same value to make sure they don’t end up out of pocket. I am not sure this is okay. Is it?

A: No, it’s not okay. It means that the expense reports are inaccurate which ultimately results in inaccurate accounts. The fact that you are aware of others acting in this way does not make it acceptable. You should talk to your line manager or supervisor to discuss a resolution to your current situation as it is not the Company’s intent that you should be out of pocket, and you should also highlight your concern that this may be common practice. In future be sure to safeguard your receipts.

Further information can be under the Compliance portal on Fugro global intranet Insite.
WE OPERATE WITH INTEGRITY

Responsible Tax

Fugro believes a responsible approach to tax is an integral part of doing business sustainably and with integrity. Fugro recognises that tax is a cost of doing business, but also a contribution to society in the countries in which we operate. This is a fundamental part of our corporate social responsibility towards a wide range of stakeholders. We have an obligation to pay the taxes due in any territory, in accordance with rules set by governments and international institutions and within the spirit of these rules.

Our Commitment

• Ensure that business decisions are based upon correct understanding of tax risks and costs.
• Seek to ensure that all tax lodgments, payments, reporting, disclosures and other tax related obligations are adhered to in a timely manner.
• Develop and foster good working relationships with tax authorities, government bodies and other related third parties in a professional, courteous and timely manner.
• Ensure that the tax consequences of (inter) company transactions are correctly reflected in the financial statements.
• Manage our tax affairs, in ways that have operational, commercial and legal substance and thus follow the real business structures of the Fugro Group and its individual entities.

Your Commitment

• Comply with professional standards of integrity and objectivity when dealing with tax affairs.
• Familiarise yourself with the tax laws and regulations that apply specifically to the combination of your type of business and relevant jurisdiction of operation.
• Maintain - or request assistance with - technical tax knowledge and apply due care, attention and judgment to arrive at well-reasoned conclusions regarding our tax affairs.
• Ensure that all tax related decisions are taken at an appropriate level and supported with documentation that evidences the facts, conclusions and risks involved.
• Create and maintain complete and accurate accounts, data and records that support the appropriate management of tax.

Q: A new client has provided me with a draft contract which states that Fugro prices include any and all taxes. Can I accept this clause?

A: No. The clause can have major financial implications. You need to ask Fugro’s tax department to carry out a tax review and to advise on negotiations with the client.

Q: My US Group company is about to make a payment to one of the Group companies outside of the US for services provided. To support the payment process my US finance colleague asks me to complete a detailed and lengthy US tax form (W8-BEN). Can I ignore the form, as the payment is between two Fugro Group companies?

A: No. It is essential that you assist in creating and maintaining complete and accurate records that support the appropriate management of tax. If you ignore the form W8-BEN you do not comply with applicable US tax disclosure requirements.

Sanctions and Export Controls

Import/export controls and sanctions laws give countries legal control over the sale, shipment, electronic transfer or disclosure of information, software, goods and services across international borders. From time to time some countries impose trade restrictions covering specified countries, entities and individuals, as well as periodically impose controls on the export and the end use of certain products, technology, software and services. In line with our values and our commitment to doing business responsibly, we all need to comply with laws and regulations governing sanctions and import/export controls. The penalties for breaking these laws, which may apply outside the legislating country, can be very serious. Penalties include fines, not being allowed to work on government contracts, cancellation of permits to export and imprisonment.

Our Commitment

• Comply with laws and regulations governing sanctions (or embargoes) and controls on the export and the end use of certain products, technology, software and services.

Your Commitment

• To remember that sanctions and controls can be imposed against countries, entities, individuals and goods.
• To know which of these sanctions or controls may result in restrictions on your ability to perform a requested scope of work.
• To think carefully about the potential impact of sanctions and export control laws before transferring goods, technology, software or services across national borders.
• To remember that sanctions and controls can be imposed against projects located in a country where EU and US sanctions programmes apply.

Q: I have been approached to tender for a project located in a country where EU and US sanctions programmes apply. Can I proceed with a tender for this project?

A: No. Fugro has a mandatory process in place requiring that approval of Fugro’s Board of Management and/or General Counsel must be obtained prior to being able to tender for or perform work in sanctioned areas or with or for forbidden/ blocked businesses, groups or individuals. Before providing any indication of Fugro’s ability to perform a requested scope of work certain checks need to be performed as included on the page Sanctions and Other Restrictions under the Compliance portal on Fugro global intranet Insite.

Q: Do I need to consider EU and/or US sanctions or export control regulations if I’m located in Singapore and only work on projects in this region?

A: Yes. You are part of the Fugro Group and therefore need to consider not only the local sanctions programmes and export control laws but also the EU, UN and US regulations.

Further information can be found on the Compliance portal on Fugro global intranet Insite.
WE OPERATE WITH INTEGRITY

Competition and Anti-Trust

Most countries in which we do business have competition laws. Some of these apply beyond national boundaries – for example, the rules in the EU and the US. The penalties for breaking competition laws are severe. Fines for anti-competitive behaviour can be up to 10% of a company’s annual global turnover. As well as being fined personally, individuals convicted of the most serious offences can face imprisonment.

**Our Commitment**
- Ensure we compete fairly and ethically within the framework of all applicable anti-trust and competition laws.
- Not attempt to prevent others from competing freely with us against anti-trust and competition laws.
- Strive to do business with those who follow business principles comparable to our own.

**Your Commitment**
- To familiarise yourself with the competition laws that apply specifically to our markets.
- To never discuss with competitors details of pricing, costs, profits, margins, trading terms, marketing and operational plans or new services/technology launches.
- To leave meetings or end conversations that raise the above subjects, and inform Fugro legal.
- To avoid giving commercial advice/appraisal to competitors or suppliers without your manager’s permission.
- To apply extra care and vigilance when handling personal data and – in particular – special category (or ‘sensitive’) personal data.
- To apply extra care and vigilance when handling personal data and – in particular – special category (or ‘sensitive’) personal data.
- To strive to do business with those who follow business principles comparable to our own.

**Q: I bumped into the marketing director of a competitor at a conference and we got talking. He asked me how we were finding the market and whether we thought we could increase prices this year. What should I do?**

**A:** You have to be very clear with the individual that you are not prepared to discuss pricing or anything else of a confidential commercial nature.

**Q: Can I accept a competitor’s price list from a customer? During a recent sales visit, a customer gave me a copy of our competitor’s price list to support his opinion that our prices are too high. Should I have accepted the price list?**

**A:** If a customer gives you competitor pricing information, make sure you make a note how you obtained the information, e.g. write the source name and date at the top of the price list. If the price list has a warning or protection notice (like copyrights or confidentiality indications) you have good reason to believe the customer may be violating a duty of confidentiality. In such case you do not accept the information. If you are ever unsure about whether you have received information legitimately, consult Fugro legal.

WE OPERATE WITH INTEGRITY

Data Protection and Privacy

At Fugro we respect the privacy of individuals. We protect the personal data (i.e. any information that could lead to the identity of a person) of our employees, clients, suppliers and other business partners. We must all ensure that personal data is collected, stored, secured and used in line with applicable privacy laws and Fugro’s eight Global Privacy and Data Protection Principles (summarised below).

**Our Commitment**
- Process personal data lawfully and fairly and inform individuals transparently about how we process their personal data.
- Process personal data for the purpose for which it was collected and not for other purposes (unless this is either compatible with the original purpose, we obtained consent, or we have a clear obligation set out in law).
- Limit the amount of personal data we process to what is sufficient, relevant and necessary for the purpose for which the data was collected.
- Ensure that personal data is accurate and kept up-to-date.
- Keep personal data no longer than is necessary to fulfill the purpose for which the data was collected, unless we need to keep the data longer to comply with retention obligations.
- Protect personal data adequately against unauthorised access, unlawful processing or accidental loss, destruction and damage.
- Respect the rights of individuals in relation to their personal data (including the right to request, review, correct, update, restrict or delete).
- Be able to demonstrate we comply with the relevant privacy and data protection laws.

**Your Commitment**
- To apply extra care and vigilance when handling personal data and – in particular – special category or ‘sensitive’ personal data.
- To observe Fugro’s eight Privacy and Data Protection Principles (included above).
- To comply with applicable local data protection requirements in addition to the requirements set out in the Privacy and Data Protection Principles.
- To take appropriate security measures when you share (personal) data internally or with third parties e.g. password protection of files and transmission via a secured channel.
- To make sure that adequate contractual data protection arrangements are in place when you share personal data with third parties.
- To immediately report suspected personal data breaches to the Global Privacy Coordinator. Please see the Privacy and Data Protection portal on Fugro global intranet Insite.

**Q: A subcontractor asks me how Fugro handles the personal data of its employees. What can I say?**

**A:** You can send the subcontractor Fugro’s General Privacy Notice explaining which personal data are collected, and how these are used and protected. The General Privacy Notice is available under the Compliance portal of Insite and on Fugro.com.

**Q: We plan to contract a payroll agency. What data protection arrangement do I need to put into place with the agency?**

**A:** Fugro is required to enter into a Data Processing Agreement with all third parties processing (high volumes of) personal data on behalf of Fugro – such as payroll agencies. You need to contact your Local Privacy Team or Fugro legal for further guidance. Please see the Privacy and Data Protection portal on Fugro global intranet Insite.

Further information can be found in the Policy on Fair Competition available under the Compliance portal on Fugro global intranet Insite or on Fugro.com.

Further information can be found under the Privacy and Data Protection portal on Fugro global intranet Insite.
First time right delivery starts with understanding the clients’ long term needs and project specific objectives and then combining these with our expertise, resources and global network to offer project solutions that can meet their requirements.

We continuously seek to enhance our business practices, with emphasis on client engagement to obtain feedback on performance and understand future requirements.

Our Commitment

• Foster an environment in which technical and business process innovation is encouraged and actively supported.
• Actively collect and promote improvement ideas from all parts of the organisation.
• Maintain and support a thriving R&D group in Fugro to continuously seek the best solutions for our clients at the highest quality practically possible.
• Maintain an ISO 9000 certified quality management system in each operating company or location.

Your Commitment

• Aim to consistently deliver our work safely, on time, on budget against agreed specifications.
• Always strive for our data and advice to be factually correct and ensure it is free from bias to desired outcomes.
• Always strive to optimise our business processes to drive up speed, reliability and quality of data delivery.
• Actively engage with our clients and seek their feedback.
• Implement lessons learned to achieve continuous improvements.
• Follow the quality management system as implemented within your operating company or location.
• Demonstrate our commitment to first time right delivery through a relentless focus on quality.

Q: Why is first time right delivery and quality so important?
A: First time right delivery and quality is the basis of maintaining a leadership position in everything we do, being able to sustain and grow our business by meeting our EBIT objectives and to pleasantly surprise the clients time and time again so they have no reason to work with our competitors.

Q: My manager has asked me to “cut some corners” with the preparation of a survey report because the project is already over budget. Is he right?
A: No, he is not right and has no right to ask this. We strive to achieve the highest standards in every service we provide. We want our clients to be able to depend under any circumstances on the quality and correctness of our reports. Even a small deficiency in a report can potentially do damage to the reputation of the entire Fugro Group. You should address this with your local regional management, alternatively report your concerns via one of the other channels indicated in the Speak Up Procedure.

WE ARE COMMITTED TO EXCELLENCE

We are determined to achieve first time right delivery of high value results safely, on time and meeting client requirements, day after day, year after year, regardless of whom in Fugro happens to deliver the service.
Fugro’s computer information resources, including e-mail and internet systems, are provided to help you carry out your work. Limited personal use is acceptable if it is for a good reason, does not interfere with your work and complies with our Information Technology (IT) use policies. At all times, use good judgment and do not access or download any data from the Internet, send emails or instant messages, or store any information that you would not want to be seen or heard by others, or that would harm our IT infrastructure. The security of Fugro’s information and computer systems is essential to our success. Anyone who uses Fugro computer assets must know how to keep them secure by following the requirements in Fugro’s IT policies.

Our Commitment
• Implement and maintain appropriate measures to safeguard our clients’ information and IT infrastructure, in order to protect and uphold the reputation, assets and interest of Fugro, its partners, affiliates and customers.

Your Commitment
• To keep our IT assets (laptops, smart phones, storage media etc.) safe and secure at all times, especially when you are not working on Fugro premises such as in a hotel or at home.
• To safeguard your passwords and user IDs. In particular make your passwords difficult to guess, change them frequently, never share them and do not allow anyone else access to your user account.
• To immediately report to your IT department any loss of equipment, suspected virus or possible breach of our IT infrastructure.
• To follow the IT policy directives issued by Fugro (e.g. software upgrade policy, internet use policy and e-mail use policy), and adhere to the terms and conditions for all third party software in use.

Fugro’s assets can be financial, physical or intangible and include buildings, equipment, funds, software, know how, data, patents and other intellectual property. We must all protect our assets, as well as the physical and intangible assets of others, against waste, loss, damage, misuse, theft, misappropriation or infringement.
WE PROTECT OUR ASSETS

Intellectual Property

Intellectual property is a key business asset and a major competitive advantage and must be managed with proper care. We believe that from inventions to trademarks all information relating to our operations, contracts, proprietary data sets, software and other intellectual property is valuable to us and should be treated as important and valuable resources.

Our Commitment

• Implement the highest levels of protection for our own intellectual property and our clients’ property that is entrusted to us during the course of our business.
• Restrict access to intellectual property and confidential business information to only those employees with a legitimate business need.
• Abide by the appropriate provisions for the protection of intellectual property and confidential business information and avoid conflicts of interest in contracts of employment and staff handbooks.

Your Commitment

• To always consult Fugro legal regarding securing Fugro’s rights when working with clients or suppliers to create intellectual property on our behalf.
• To obtain approval from senior management should you be required to release intellectual property or confidential business information absolutely necessary for the conduct of our business. Such release is to be under the protection of appropriate confidentiality agreements.
• To never download, copy, distribute, post on a website or use any material covered by another person’s or organisation’s copyright without obtaining permission.
• To always consult with your line manager when you have ideas or you believe you can create meaningful intellectual property.

Q: I have just joined Fugro from one of our largest competitors. Can I share some important confidential technical information that I developed while working for that competitor?

A: No. This would breach the Code, your obligations to your previous employer and possibly the law. You are obliged to protect your past employer’s confidential information just as Fugro employees are obliged to protect ours. You can use the general knowledge and skills you learned in your previous job, but you cannot bring to Fugro any confidential or protected materials produced by you or anyone else for your former employer. Check with Fugro legal if you have any questions about specific information.

Q: To reduce trade publication subscription costs, can I buy one subscription to each publication, and then distribute them to my colleagues with instructions to copy any articles they want?

A: No. While you can circulate the original publication, making copies would infringe copyright – as would scanning the pages and circulating copies by email. You should only copy articles with the publisher’s permission. Alternatively, you could buy file copies from the publisher.

Protection of Assets

Everyone at Fugro is responsible for making sure our assets are not misused, damaged or wasted. Our assets can be financial, physical, or intangible such as company funds, equipment and property, time, intellectual property, proprietary information and corporate opportunities.

Our Commitment

• Provide you with the assets, know how, information, and training to do your jobs to the best of your ability.

Your Commitment

• To use our assets appropriately and responsibly.
• To respect the physical and intangible assets of our clients, contractors, suppliers and other stakeholders.
• To understand that failure to follow the requirements of our Code or any laws or regulations may result in disciplinary action, including dismissal.

Q: A former Fugro employee has asked me for copies of materials we worked on together when he was with the company. I also discovered that he already had a lot of printed and digital Fugro materials and data. What should I do?

A: Under no circumstances should you give him the information he has asked for, which may be confidential. He has breached our Code by taking Fugro information with him when he left the company and there could be further issues if he has used or revealed the information to others. The obligation to keep confidential Fugro information secure applies not only during but also following employment. Talk to your line manager and legal team immediately. They will decide what action is needed to protect our information in this case.

Q: Can I borrow a Fugro truck over the weekend to deliver some garden equipment to my friend’s house?

A: No. Fugro vehicles are for company business only, not personal activities. In addition the truck’s insurance may not be valid if it is used for non-business purposes and you would be personally liable for any damage or accidents.
Fugro recognises its responsibility under the Universal Declaration of Human Rights to protect human rights, and to ensure that our business operations do not contribute directly or indirectly to human rights abuses. We seek to establish and adhere to clear ethical standards for ourselves, and expect similar standards in all third parties who act with us or on our behalf.

**Our Commitment**

- Support fundamental human rights in line with the legitimate role of business.
- Ensure our employees have the right to expect that their basic human identity and dignity are respected in the workplace.
- Reject any form of discrimination.
- Not tolerate any form of harassment, bullying or intimidation.

**Your Commitment**

- To ensure that our business operations do not contribute directly or indirectly to human rights violations.
- To always respect the human rights of those with whom we work and come into contact with.
- To encourage partners, suppliers and other third parties that we do business with, to adopt similar standards with respect to human rights.
- To understand the human rights issues where you work and uphold Fugro’s commitment on human rights.

**Human Rights**

Q: I heard informally that one of our suppliers is under investigation for using forced labour. We haven’t heard this from the supplier and I’m not aware of any previous problems. Should I ignore the rumours?

A: No. Fugro will investigate the matter further even though the rumours may turn out to be false. Talk to your line manager, regional management or Fugro legal who will advise on the appropriate action.

Q: We are considering doing a project with a sub-contractor but we are concerned that the wages they pay to their employees are below the normal level for the industry. The sub-contractor has agreed to address this if we are awarded the contract. Given this commitment, is it okay to go ahead?

A: Fugro expects its sub-contractors to pay fair wages in line with the norms for the industry and market and not to require anyone to work excessive hours, particularly where this might impact personal health or safety. You should raise the issue with your line manager and seek guidance from Fugro legal on the appropriate action to take.
WE ARE COMMITTED TO SOCIETY

Environment

The growing demand for energy is increasingly being met by renewables such as solar, wind, biomass and tidal energy. New major infrastructure and building projects increasingly take environmental issues into account. Reduction of fossil fuel consumption and carbon emissions is therefore important in determining the nature of the projects carried out around the world. As such we will constantly look for ways to reduce the environmental impact of (our and our clients) operations and services.

Our Commitment

• Promote energy savings in our activities and increasing the use of sustainable materials.
• Reduce energy consumption and use of materials at office locations, as well as by our fleet of vessels, aircraft and vehicles.
• Significantly reduce the environmental impact of our operations through the efficient use of resources, the reduction of waste and carbon emissions, recycling where possible and the careful handling of hazardous substances.
• Educate and motivate our employees to conduct activities in an environmentally responsible manner and encourage those we do business with to do the same.
• Challenge unsustainable activities if they occur, such as wasteful use of water and other natural resources, lack of effective recycling, failure to consider environmental impacts in business decisions.
• Seek opportunities to work with our suppliers to develop appropriate environmental management systems.

Your Commitment

• To follow the environmental standards as outlined in our environmental management system, as well as comply with local environmental legislation.
• To be committed to reducing waste, emissions and discharges and using energy efficiently.
• To support local environmental sustainability initiatives such as energy saving and waste reduction programmes.
• To be vigilant with respect to reporting any environmental risks, hazards or situations which do not look or feel right – including any potential regulatory breaches.

Q: We’re investing a lot of time and money in environmental matters but we’re just one company. Is this really going to make a difference? What about everyone else?
A: We believe that we have a substantial contribution to make in addressing environment issues. Our supply chain is one way of doing this. As a minimum, we expect our suppliers to have a clear environment policy and a commitment to developing appropriate environment management systems.

Q: My business unit has instigated an initiative to encourage us to only print documents when necessary. I prefer to look at things in hard copy rather than on the screen so won’t be following this approach. Is this okay?
A: Fugro respects the environment and seeks through a range of initiatives, seeks to minimise its environmental impact. Reducing our usage and waste of materials is one of the ways of doing this. Although you may prefer to operate in a certain way, we all have a responsibility to try to change our behaviours where required to support Fugro’s environmental strategy.

Local Communities

Fugro aims to be a good neighbour and our companies are encouraged to contribute directly or indirectly to the general well-being of the communities within which we work, while at the same time minimising disruptions. Managers and their staff are encouraged, where and when appropriate, to involve themselves in the local community, support charitable and cultural events and support trade and academic bodies whose aim it is to improve the effectiveness of the industries in which we operate. We support different initiatives around the world, particularly in the area of science, culture and sports.

Our Commitment

• Play an active and positive role in our communities and encourage employees to do the same, in the belief that the countries and communities in which we operate should benefit from our presence.
• Work hard to create open and sincere relationships with local communities, as well as with bodies such as non-governmental organisations (NGOs) who have a legitimate interest in what we do as a company.
• Encourage local community development initiatives and civic causes which create mutual advantage for Fugro and the community or country.

Your Commitment

• To always comply with local laws and regulations wherever you work.
• To work in a way that is consistent with local cultures and business customs, as long as they do not conflict with this Code and local requirements.
• To treat community members with dignity and respect their rights.
• To be sensitive to the unique situation and vulnerability of indigenous peoples.
• To recruit qualified local personnel where it is possible and there is a bona fide need.
• To notify your line manager for any charitable donations, in money or in kind, to political parties, political organisations or individual politicians or candidates for public office.
• To obtain approval from your country manager for any charitable donations, in money or in kind, to local political parties or candidates for public office.
• To always comply with local laws and regulations wherever you work.
• To work in a way that is consistent with local cultures and business customs, as long as they do not conflict with this Code and local requirements.
• To treat community members with dignity and respect their rights.
• To be sensitive to the unique situation and vulnerability of indigenous peoples.
• To recruit qualified local personnel where it is possible and there is a bona fide need.
• To notify your line manager for any charitable donations, in money or in kind, to political parties, political organisations or individual politicians or candidates for public office.
• To obtain approval from your country manager for any charitable donations, in money or in kind, to local political parties or candidates for public office.
• To ensure that we do not make payments or donations, in money or in kind, to political parties, political organisations or individual politicians or candidates for public office.

Q: I’m involved with a programme to support local schools in helping children to improve their reading. They are currently looking for new volunteers and I am thinking of asking my colleagues whether they would like to get involved. Is this okay?
A: Yes. We want to encourage employees to pursue issues which are important to them and their communities. Do make sure your line manager is aware and supports your initiative.

Q: I am a volunteer fund-raiser for a local charity and I would like to approach my colleagues at work and ask them to donate to the charity. Can I do this during official hours?
A: While Fugro fully supports our employees’ involvement in volunteering their time towards a good cause, we feel that it is only fair to all employees that any canvassing or time spent volunteering for an organisation does not disrupt the business and as such should be conducted in the employee’s own time. For example either after business hours or during the employee’s lunch break.

Q: Fugro has been asked for a political contribution to a local political party. Can I consider a payment on behalf of Fugro?
A: No. Fugro shall not make payments or donations, in money or in kind, to political parties, political organisations or individual politicians or candidates for public office.

Further information can be found under the Sustainability portal on Fugro global intranet Insite and Fugro.com.

Further information can be found in the Policy on Sponsoring and Charity under the Compliance portal on Fugro global intranet Insite.

Sustainability
Traditional media refers to what is generally considered as the “old way” of disseminating information typically involving only one-way communication. It may also refer to the media used before the advent of technological advances like the Internet. In general by traditional media we mean print (newspapers and magazines), radio and television.

Our Commitment

• Establish guidelines for communication with, and the use of, traditional media by Fugro personnel in order to protect and promote the reputation, assets and interest of Fugro, its partners, affiliates and customers.

Your Commitment

• To refer all media enquiries to the appropriate authorised person or global communications team.
• To avoid engaging with the media on Fugro’s behalf unless specifically authorised to do so by a member of the global communications team.
• To seek advice from the global communications team before accepting an invitation to speak at, or take part in, a media event.
• To seek approval from your line manager before accepting any invitation to speak or publish at a technical conference, industry panel or university.
• To ensure all media announcements and press releases are approved in advance by an appropriate member of the global communications team.
• To refer any approach by an investor or financial analyst to the investor relations team.
• To take care to not cause any harm to the reputation of Fugro in any external communication.
• To remember that communications with a competitor can violate anti-trust laws.

Q: I have just received an invitation to speak at an industry conference. I think it would be a great marketing opportunity for Fugro, therefore I’d like to accept. Do I need to check with anyone first?

A: Yes, you should discuss the invitation with your line manager and the global communications team before accepting. You should always be careful to seek the appropriate approvals when you are representing or seen to be acting as a spokesperson for Fugro.

Q: I have been approached by a local television station and asked to comment on the progress and local financial implications of the survey we are undertaking. Should I discuss these issues with the journalist?

A: Before you do anything, talk to your line manager and global communications team. They will tell you whether it is appropriate to respond. If it is, they will provide you with further advice regarding what you can and cannot divulge.

Further information can be found under the Communications portal on Fugro global intranet Insite.
WE CARE FOR OUR COMMUNICATION

Social Media

Social media is the interaction among people in which they create or exchange information and ideas in virtual communities and networks that depend on mobile and web-based technologies. Social media differs from traditional media in many ways, including quality, reach, frequency, usability, immediacy and permanence. Some examples of social media include email, Facebook, Twitter, LinkedIn, blogging, internet forums etc.

Our Commitment

- Establish guidelines and rules that all employees are expected to follow when using social media, in order to protect and uphold the reputation, assets and interest of Fugro, its partners, affiliates and customers.

Your Commitment

- To ensure you add a simple but visible disclaimer on any personal website that identifies that you work for Fugro stating that anything you have written or displayed represents your own personal views.
- To be personally responsible for any of your online activity conducted with a Fugro email address and the company’s PCs, smartphones (e.g., BlackBerry) or our network. Even if you are logged into your own personal account you should know that it can be traced to Fugro. The fugro.com address attached to your name implies that you are acting on the company’s behalf.
- To ensure that before posting any online material through social media, the material is accurate, truthful and without factual error.
- To ensure that you do not disclose or use Fugro’s or a client’s confidential or proprietary information in any form of online media.
- To ensure you have approval from the global communications team before responding on Fugro’s behalf or writing about a client or a known competitor of that client.
- To not engage in the conversation if a blogger or any other online participant posts an inaccurate, accusatory or negative comment about Fugro or Fugro’s clients. You should immediately notify our global communications team.
- To avoid online fights and communicating with hostile personalities in an effort to avoid personal, professional or credibility attacks.
- To identify any copyrighted or borrowed material when publishing any online material through social media that includes another’s direct or paraphrased quotes, thoughts, ideas, photos, or videos, always use citations and link to the original material where applicable.
- To obey the law. Do not post any information or conduct any online activity that may violate applicable laws and regulations.

Q: I read an article in an online publication the other day which stated certain things about Fugro’s business that I know are wrong. Should I write a note to the online publication’s editor and ask them to correct this article?

A: No. While it is good to be alert to misleading or incorrect reporting about the company, it is not your responsibility to seek to address such inaccuracies. You should inform the global communications team and/or Fugro legal about the article.

Q: I have been asked to post a photograph of a colleague on Facebook. Is that OK?

A: No, not without his/her approval. You need to respect the privacy of others at all times.

WE CARE FOR OUR COMMUNICATION

Brand Guidelines

The Fugro brand symbolises our promise to clients that they can expect consistency and quality in our services wherever they are in the world. It is an expression of who we are, what we stand for and what we deliver on land, at sea or in the air. The brand is more than simply the logo - it is the combination of visual elements, text, colours, graphics and photographs. In a world where people are bombarded with promotional messages of all kinds, the consistent appearance of Fugro in media of any kind greatly supports the Fugro brand. Correct use of our brand instructions supports our aim to present all of our operating companies as ‘One Fugro’.

Our Commitment

- Provide for high quality, professionally designed Fugro style elements which we can be proud to show to colleagues, clients, prospective employees and friends.
- Provide our employees, with the tools, material, know-how and support to correctly use the Fugro style elements and create a positive, professional image of Fugro.
- Establish guidelines and rules that all employees are expected to follow to respect the privacy of others.
- Support to correctly use the Fugro style elements and create a positive, professional image of Fugro.

Your Commitment

- To use Fugro style elements and visual language in accordance with the Fugro Brand Guidelines.
- To never display the logo in any form different from the guidelines because it can jeopardise the trade mark protection and our brand integrity.
- To contact the global communications team when you are involved in developing, advertising or promotional campaigns, before any details are published or shown to clients, other stakeholders or the public.
- To respect intellectual property rights and trademarks of others as we expect others to respect ours.
- To never download, copy, distribute, post on a website or use any materials covered by another person’s or organisation’s copyright without obtaining permission.

Q: I was asked to provide a copy of the Fugro logo for display on a website of a supplier. Is that OK?

A: You need to consult with the global communications team. Although association with other organisations such as suppliers can be a good thing, it can easily turn against Fugro if the reputation of the supplier is damaged.

Q: I was asked to write an article for a local magazine about a project we recently completed. Do I need to ask for permission to do this?

A: Yes, you need to contact the global communication team for advice and probably also ask the client involved in the particular project for approval by e-mail or in writing before publication.

Further information can be found under the Communications portal on Fugro global intranet Insite.