



Boels
RENTAL



Boels
Speak Up
Policy

Boels Speak Up Policy

At Boels we are committed to conduct business in a way that is fair, honest, and respectful of the law and our policies and values. We foster a culture of trust and open communication in which Code of Conduct violations are not tolerated. Doing the right thing – and adhering to the Code – entails reporting concerns and violations, even if you only suspect them. Speaking Up is critical to our reputation, success, and ability to operate.

Boels is dedicated to look into any potential violations of our internal Code of Conduct, our Supplier Code of Conduct, our internal policies and applicable laws, including those pertaining to human rights and environmental sustainability (collectively referred to as “compliance violations”). We encourage anyone who has information or a suspicion about actual or potential compliance violations involving Boels or brought on by one of Boels’ suppliers, to report them through the appropriate channels. Those channels are listed in section 4. Please use them exclusively for the above mentioned purpose. If you want to enquire about our services, rentals, bills etc. please contact our Customer Care Center via <https://www.boels.com/en-gb/customer-service>.

If someone reports a potential compliance violation in good faith, they will not face any negative repercussions. The following overview contains all the details about our complaint’s procedure. On the right side, there is a download link as well.



01

Integrity and compliance at Boels

At Boels, we are dedicated to upholding the law and conducting business ethically. For us, maintaining integrity entails acting morally, even when no one is watching, and that we keep our word.

Everyone at Boels, from interns to board members, is subject to our Code of Conduct. Not only does it outline our standard operating procedures but also provides direction for addressing the most significant ethical and legal issues in our day-to-day interactions with coworkers, clients, partners in business, and other outside parties.

We think that a shared dedication to doing business ethically ensures lasting and mutually beneficial relationships. Therefore, the standards outlined in our Supplier Code of Conduct must be followed by all our business associates and suppliers, and they must be applied to the entire supply chain.



Reporting a compliance concern

We promote a climate of trust and open communication. This also means that we encourage anyone to voice their concerns if they have knowledge of or are impacted by potential risks or violations. This includes our employees, business partners, and other stakeholders. We encourage you to use Boels Speak Up, if you suspect that something is not quite right, we hereby encourage you to make use of Boels Speak Up, our independent system for reports on misconduct and compliance violations.

The information provided below explains how concerns about compliance violations, whether actual or potential, can be expressed without fear of retaliation and how such reports are handled within Boels.

2.1 What is a compliance concern?

A compliance concern is when a person has information on actual or potential violations related to:

- The Code of Conduct and internal Boels policies, such as violations of fair competition, anti-bribery, and anti-corruption, health & safety, sexual harassment, abuse of power and other unethical behaviors.
- Human rights and environmental due diligence in one's own business operations as well as within the supply chain, such as disregard for occupational safety, working hours, free assembly, child, and forced labor.
- Breaches of laws and regulations, as well as directly applicable European Union and European Atomic Energy Community laws.
- Infractions that are punishable under the law.
- Violations punishable by fines, if the violation serves to protect life, limb, health, or to protect the rights of employees or their representative bodies.

2.2 Can I report a compliance concern?

Anyone with knowledge or suspicion of a compliance violation caused by Boels' business operations or by one of Boels' suppliers is encouraged to use the available channels mentioned below to report a concern. This should be carried out in good faith, which means that there should be reasonable grounds to believe that the facts reported are correct.

2.3 When should I report a compliance concern?

An actual or potential compliance violation should be reported via the available reporting channels as quickly as possible. If a compliance violation has not yet occurred but may happen in the future, we also encourage you to raise your concern. To prevent harm to any party we will immediately deal with the issues at hand.

How to raise a compliance concern?

Everyone who wants to report a concern about an actual or potential compliance violation brought on by the business operations of Boels or by one of its suppliers is welcome to do so through the channels outlined below.

3.1 I am a Boels employee

If you work at Boels, first try to address your concerns with the person who is responsible for the (potential) compliance violation. If you feel this is insufficient, please contact your manager or HR Business partner. If available in your country you can also contact the Trust Person. If reporting through these channels is not possible or feels uncomfortable, or if you believe a serious violation has occurred, we encourage you to contact the Boels Speak Up system.

In section 4 we will further explain how this works.

All reports can also be made anonymously. Please be assured that in this case, we will not take any steps to determine the originator.

All individuals who wish to report a concern may also do so through external channels (e.g. responsible offices, institutions, or other).

3.2 I am not a Boels employee

If you are not a Boels employee (e.g., a customer, a supplier, an ex-employee, a local resident, or someone else), please contact your local Boels contact person to report your concern.

If this is not possible or does not feel right, or if you believe there has been a serious breach, we encourage you to contact the Boels Speak Up system. In section 4 you will find out how this works.

All reports can also be made anonymously. It is our practice that in the event of an anonymous report, we will not take any steps to establish their identity.

All individuals who wish to report a concern may also do so through external channels (e.g. responsible offices, institutions, or other).

3.3. Reporting channels at a glance

Speak Up system (web & app: written and spoken reports).

The Boels Speak Up line: what is it and how do i use it?

Boels Speak Up is our 24/7 anonymous, independent reporting system. The reports are either processed by the Boels Speak Up Office or forwarded to the responsible departments. The Boels Speak Up Office consists of the Sustainability Specialist, H&S Specialist, Compliance Officer, HR Officer, and the Risk Manager.

The system is provided and operated by People In Touch, an external provider based in Amsterdam in the Netherlands.

4.1 How to make a report in Speak Up

Boels Speak Up offers two ways to make a report:

The secured Speak Up website:



Internal:

<https://boelsrental.speakup.report/Employees>



External:

<https://boelsrental.speakup.report/External>

The Speak Up app:



Reports can be made both in writing and verbally (e.g. a voice message) using the Speak Up app. The app can be downloaded by scanning this QR Code:

Making report of a compliance violation will not incur any costs.

4.2 Required information

Actual or potential compliance violations should be reported as soon as possible. The report should include all information relevant to the issue. In addition, it should be supported with evidence where possible. It is possible to add multiple documents to the report (e.g. photo's, e-mails, text messages, etc.).

If possible, include information about the following:

- **WHAT:** Describe what happened, the nature of the issue and, if possible, the rules or laws affected.
- **WHEN:** Describe the date and time the compliance violation happened, for how long it lasted, and when it stopped. It is also possible that it has not yet happened, but you have a suspicion that it is about to happen.
- **WHO:** Describe who was involved in the matter or who is also aware of the violation and could provide more details.
- **WHERE:** Describe the location of the compliance violation. This could also be in another country or at one of Boels' suppliers.

You can of course submit your reports in your own language/ mother tongue.

4.3 Tips

The following are some tips on how to use Boels Speak Up:

- If you worry about being overheard or observed when reporting a compliance violation, you can also access Boels Speak Up from any other location that you deem secure to leave a report.
- Boels Speak Up is available 24 hours, 7 days a week from your telephone or computer. Therefore, reports may be submitted at any given time.
- Before you submit a report, make sure you have decided whether or not you wish to remain anonymous.
- Think carefully about the type and amount of information you wish to share with Boels Speak Up Office. However, there is a possibility to add additional information after you have already submitted the report. You can do so by logging in to the Speak Up web system with the case number.
- Provide as much information as possible to substantiate your concern and speed up the investigation process. For example, include locations, names, dates and times, invoice numbers, etc.
- You can upload any additional evidence in electronic form on the Boels Speak Up web system.
- Make sure to save the unique case number you are provided with after submitting the report. You need the case number to log in to the Speak Up web system to view feedback (additional questions, next steps, etc.) on the report and communicate with the Boels Speak Up Office.
- Regularly check if a response has been left for you by the Boels Speak Up Office.

What happens after i submit a Speak Up report?

5.1 Who will process my Speak Up report?

The Boels Speak Up Office reviews all reports submitted via Boels Speak Up. The team usually receives your report within 24 hours (translated if necessary). Please be assured that it is handled with the necessary care and discretion. After the information has been assessed our team determines whether the concern is plausible and further steps need to be taken. If there is enough justification, the Boels Speak Up Office will open an internal investigation into the reported compliance violation.

In some circumstances, the report will be forwarded directly to the appropriate department without intervention of the Boels Speak Up Office. In some cases the report will be investigated by an external (fraud) investigator or punctuation. This will happen in accordance with internal procedures and risk accountability. Persons in charge of the proceedings are guaranteed to be impartial, independent, and unaffected by orders. They are also sworn to secrecy.

5.2 How to stay in touch

After submitting a report about a compliance violation via the secured website or the app, the originator will receive a case number. This case number is used to log in to Boels Speak Up to stay in touch with our Boels Speak Up Office. It is also possible to add extra information to the report.

5.3 First assessment of the report

Within 7 days after submitting the report via Boels Speak Up, the originator will receive a confirmation receipt along with an answer informing about the first assessment of the report. Additionally, the originator will receive a summary of the matter along with the next steps. The Boels Speak Up Office might contact the originator to further discuss the facts or ask questions for investigation purposes.

If the first assessment results in the launch of an internal investigation, the Boels Speak Up Office will monitor its progress accordance with the internal procedures. In addition, the Boels Speak Up Office will provide feedback to the originator as far as it is permitted by law and provided that sharing such feedback will not jeopardize the investigation of the report, the personal rights of individuals involved, or the rights of others.

5.4 Completion of the report

If a report is closed after the initial review the originator will be informed about the reason of its closure and will also have the opportunity to comment on the decision within 30 days. However, the reporter may file a new report via Boels Speak Up or raise the matter again, particularly if new circumstances become known. If the originator is not satisfied with the outcome of the investigation, this concern can be raised with Boels and a further investigation could be initiated. During the initial review or investigation of the report, certain aspects may need to be clarified or additional documentation may need to be requested from the originator. In such a case the purpose of further information and additional documentation will be indicated. The originator will then receive feedback on the status of the report again.

The originator will be informed of the findings and any resulting corrective or follow-up action within 3 months after the acknowledgement of receipt. If the receipt has not been confirmed the originator will be informed no later than three months and seven days after filing the report. If the initiator does not agree with the outcome it can be raised with Boels Speak Up again and further review or consideration can be initiated. After the final response, the report will be closed in the Speak Up system after 30 days if no further communication is received from the originator. The implementation of preventive and/or remedial measures is not affected. However, the originator may submit a new report via Boels Speak Up.

Anonymity, confidentiality, and non-retaliation

6.1 Raising a concern anonymously

If you wish to report a compliance violation through Boels Speak Up, it is possible to do so anonymously. However, we encourage reporters to be transparent about their identity by providing their name, position (within or outside of Boels), and contact details. This will enable the Boels Speak Up Office to communicate efficiently and handle the report more effectively. The Boels Speak Up Office handles all reports with great care and discretion.

Once a report is submitted via Boels Speak Up, it is first received by our provider, People In Touch (the provider of the Speak Up platform) and then forwarded to our Boels Speak Up Office (translated if needed). This prevents the originators IP address from being identified. Therefore, it is also not available to anyone within Boels.

6.2 Confidentiality & Identity protection

If you choose to be transparent about your identity, the Boels Speak Up Office will always make sure that your identity and/or other non-public information will be treated confidentially and in accordance with applicable data protection laws. Boels Speak Up is operated in such a way that the originator's identity and other related information (particularly of individuals named in the report) are secure.

Information on the report will only be disclosed to authorized entities outside the Boels Speak Up Office on a need-to-know basis (e.g. employees within Boels authorized to handle the report or attorneys who are also required to keep the information confidential).

In unique circumstances, it might be necessary for Boels to also inform the appropriate authorities of the report's details. The originator will be informed in advance of such intention, to the extent permitted by law and practical under the circumstances.

Boels is committed to abiding by all applicable privacy and data protection laws. Every report received by Boels will be documented. These records are handled with discretion. They are only kept as long as it is appropriate and necessary to do so in order to comply with legal requirements.

<https://www.boels.com/en-gb/privacy-statement>

6.3 Non-retaliation

The person reporting any misconduct or violation will under no circumstances be revealed, face any retaliatory or disciplinary action or be subject to other adverse consequences. This is regardless of the accuracy of the report. Boels will not tolerate any form of retaliation (including threats of retaliation) against:

- The reporting person him/herself.
- Any third party connected to the reporting person (e.g. colleagues or relatives).
- Anyone who assisted a reporting person in the process.

Internal rules are in place at Boels to ensure the protection of the reporting person along with the related entities as listed above. Initiators of reports will not be accused of violating any restrictions regarding information disclosure. They shall not incur any liability and will be legally protected by Boels as far as the companies judicial influence extends. This is subject to the condition that initiators had reasonable grounds to believe that reporting or public disclosure of such information was required for the report.

Any direct or indirect action or omission, within Boels' sphere of legal influence, that may harm a reporting person as a result of reporting a concern is prohibited, for example:

- A suspension, a layoff, a dismissal, or other similar action
- Demotion in rank or refusal of a promotion
- Assignment of new responsibilities, relocation to another workplace, pay cuts, and shifts in working hours
- A poor performance review or a bad employment reference
- The imposition or administration of any disciplinary action, censorship, or other punishment, including a monetary fine
- Threats, coercion, harassment, or exclusion
- Discrimination, unfavorable treatment, or unfair practices
- Failure to renew, or early termination of a temporary employment contract
- Negative effects, such as damage to a person's reputation, particularly on social media, or financial loss, such as a reduction in revenue or earnings
- Cancellation or early termination of a contract for goods or services
- Cancellation of a permit or license



07 Questions

The Boels Speak Up Office will answer questions related to our internal Code of Conduct, our Supplier Code of Conduct, our internal policies and applicable laws, including those pertaining to human rights and environmental sustainability on compliance@boels.com.

Customer complaints or questions about Boels products or invoices are not considered to be compliance matters. For this, kindly get in touch with our Customer Care Center via <https://www.boels.com/en-gb/customer-service>.

