

Arcadis General Business Principles



Improving quality of life

With sustainability at the heart of everything we do, our focus is on maximizing our impact aimed at improving quality of life.

*As a global company, we are committed to five core values: **People First, Client Success, Integrity, Collaboration, and Sustainability.***

The purpose of these Arcadis General Business Principles (AGBP) is to further develop and maintain a culture where these five core values are at the forefront of all we do.

Integrity means that we work to the highest professional and ethical standards and establish trust by being open, honest, and responsible. Integrity is not one action or belief – it is a culmination of the ethical standards we follow and how we will create and maintain a relationship with one another. It is a fulfilment of our high standards of responsibility to our clients, our people, shareholders, business partners, society and governments and the laws and culture of the countries in which we operate.





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Message from the CEO

Arcadis' mission is to create exceptional and sustainable outcomes for our clients in natural and built assets.

As a global business that is passionate about improving quality of life and maximizing our impact by developing sustainable long-term solutions, we have set out in the Arcadis General Business Principles (AGBP) our responsibilities to our people, clients, shareholders, business partners, society and governments. It reflects our commitment to comply with the laws, regulations and culture of the countries in which we operate. The General Business Principles apply to everything we do and form our code of conduct, guiding the behavior we expect of all our people when conducting business anywhere in the world. We also expect our business partners to live by these or equivalent principles.

We believe that our shared core values ensure our mission is fulfilled: **People First, Client Success, Integrity, Sustainability and Collaboration**. They are the foundation of our General Business Principles.

Our behavior creates the integrity and compliance culture of our organization and a sustainable future. At Arcadis we work to the highest professional and ethical standards and establish trust by being open, honest and responsible. Our management teams have the added responsibility of leading by example, to ensure that all employees are aware of the General Business Principles and make the right decisions in accordance with both the letter and spirit of these principles, creating a culture where people are supported in doing the right thing. We do not expect anyone to shortcut these in order to save time, money or costs.

The application of the General Business Principles is strengthened by a comprehensive compliance management system, which is designed to ensure that our people understand and confirm compliance with the principles and act in accordance with them. This includes the responsibility of management to provide our people with safe ways to raise concerns and report instances of non-compliance. We encourage our people to seek advice from their line manager and expect our people to report suspected misconduct or breaches of the General Business Principles to Arcadis.

I see this as a very personal as well as a corporate responsibility. For me it's about ethics: to firstly speak up and take action, secondly to look out for each other and thirdly to champion having an ethical approach to everything that we do.

Thank you for your personal commitment and leadership to integrity and compliance. That is an integral part of our mission to Improving Quality of Life for all.

Alan Brookes
CEO, Arcadis NV



Chapter 2

How we conduct business

Chapter 2.1

Anti-bribery and corruption

We do business with the utmost integrity and honesty. Bribes, corruption, or kickbacks of any kind are unacceptable and against the law.

We do not offer, request, give or receive any bribes or other illegal inducements.

Bribes may include money, gifts, hospitality, expenses, reciprocal favors, kickbacks, facilitation/grease payments, or sponsorship agreements.

Arcadis bans facilitation payments, even if local laws and regulations were to permit them.

Agreeing to bribery, even if in the end it does not happen and/or cash or other compensation does not exchange hands, is already enough to amount to a criminal offence.

This applies to all Arcadians anywhere in the world, and our agents, consultants, business partners, suppliers, and subcontractors.

We do business with the utmost integrity and honesty. We never resort to bribery, corruption, or kickbacks.

You are responsible for understanding and complying with our Specific Anti-Corruption Standard (SACS) and for educating yourself to recognize signs of corrupt activities and to speak up against them.

Your responsibilities

Do

- ✔ Remain alert to the risks of bribery and corruption and educate yourself to recognize signs of corrupt activities.
- ✔ Complete due diligence on third parties and ensure anti-bribery provisions are included in contracts where appropriate.
- ✔ Speak up and report any concerns you have about improper conduct or corruption activity.
- ✔ If you are forced to make a payment because you genuinely believe your life, limb or liberty is at risk, this is not a facilitation payment but must be reported as if it were.

Do not

- ✘ Do not condone or tolerate any form of bribery or corruption.
- ✘ Do not offer, pay, make, seek, or accept a personal payment, secret commission, or favors, including gifts, hospitality or entertainment (or a benefit of any kind) in return for favorable treatment or to gain a business advantage (or anything which could be construed as such).
- ✘ Do not make a payment to a third party if you know or suspect that they may use or offer some or all the payment directly or indirectly as a bribe.
- ✘ Do not allow others to engage in conduct on your behalf that you cannot do yourself, as Arcadis can be held liable for misconduct undertaken by others on its behalf.

Further information for employees is available on the Arcadis Intranet

[Compliance Management System](#), [Specific Anti-Corruption Standards \(SACS\)](#), [Local Anti-Bribery and Corruption Policy](#), [AGBP Issue Reporting and Handling Procedure](#), [Global Supplier Code of Conduct](#), [Arcadis Integrity Line for employees \(anonymous\)](#)

Definitions

Bribery or a bribe can include the offering, promising, giving, or receiving of a payment or other advantage to a (public) official or a private person or entity to improperly influence government or business decisions, including selection procedures and award decisions. Bribes in any form are unacceptable.

Facilitation or grease payments are small amounts paid to an (public) official to encourage the official to start or expedite performance of a 'routine action' that they are already required to do, for example the issue of a visa, a permit or tender documents.

Chapter 2.2

Gifts and hospitality

Care must be taken when giving, promising or receiving gifts, drinks, meals and other hospitality, to or from clients, suppliers, business contacts and (public) officials, in particular during times when important business decisions are being made, because they can be considered, in certain circumstances, as forms of bribery or undue influence.

Arcadians may give or receive gifts and hospitality of modest value and infrequently, in the ordinary course of business, and subject always to local approvals. However, it can never be done, or be seen to be done, in the expectation of something given in return or in circumstances which compromise your ability to make objective and fair business decisions, both at the time and in the future.

Public officials

When (public) officials are involved in the giving, promising or receiving of gifts and hospitality, you must take extra care because (public) officials are often subject to greater restrictions, laws and regulations.

Family members

When family members or close friends of Arcadians are involved in the giving, promising or receiving of gifts and hospitality, you must take extra care and always obtain local management approval beforehand. Gifts and hospitality must be given for a bona fide business reason only.

Your responsibilities

Do

- ✔ Be aware of and comply with acceptable local value and frequency limits and any other requirements, in your local gifts and hospitality policy.
- ✔ Always consider whether you feel comfortable with telling other people about the offer, promise or acceptance of this gift or hospitality. Think: how would I feel if this was on the front page of tomorrow's newspaper?
- ✔ Assess whether giving or accepting the gift or hospitality may compromise, or appear to compromise, your integrity and objectivity in performing your duties or cause or appear to cause a conflict of interest.
- ✔ Get prior approval from local management for gifts and hospitality above local value and/or frequency limits. Care must be taken if travel, overnight accommodation or (public) officials are involved. When in doubt contact your Compliance Officer to align on an appropriate approach.
- ✔ Keep an audit trail of obtained local approval for gifts and hospitality above local value and/or limits.

Do not

- ✘ Do not offer, promise or accept gifts or hospitality during the time when important business decisions are made, such as a pre-qualification, tender process, (non-)performing agreements, or settling of a dispute.
- ✘ Do not attempt to divide or disguise the value and/or frequency of gift(s) and hospitality or accept anything delivered to your home address or your family members.
- ✘ Do not offer, promise or accept gifts or hospitality in the form of cash or cash equivalents (such as gift-vouchers, cards, use of a holiday home or discounts).
- ✘ Do not accept or give a gift(s) or hospitality that are indecent or would violate any local law, regulation, rule or the standards / code of conduct of the recipient's organization.

Further information for employees is available on the Arcadis Intranet

[Compliance Management System](#), [Local Gifts & Hospitality Policy](#), [Arcadis Integrity Line for employees \(anonymous\)](#)

Definitions

Public official or official is an employee or official of an public (international) organization, government or government entity who carries out a public function, whether or not such person is employed, seconded, self-employed, elected, or appointed, for instance, where a public service is outsourced to a privacy contractor, such contractor could be regarded as "public official", as well as members of political parties or candidates for political office could be regarded as government officials.

Infrequent means 2-3 times a year.

Chapter 2.3

Conflicts of interest

A conflict of interest arises when your personal or financial interests, activities or relationships interfere, or run the risk of interfering, with your ability to make decisions in the best interests of Arcadis or our clients.

Outside employment/activities

Arcadians are permitted to engage in outside work or hold other jobs, subject to prior approval of your line manager and (if appropriate to ensure there is no conflict) your local Compliance Officer. Approval will only be withheld if Arcadis has objective reasons for doing so.

Hiring public employees

When you or close family have been employed by a public or government related organization in the last 2 years, this should be disclosed and requires review and approval prior to hiring.

Board membership

Arcadians are required to obtain local approval from their line manager before serving on any board or, accepting a directorship, including non-profit and community boards. Approval will only be withheld if Arcadis has objective reasons for doing so.

Do I have a conflict of interest?

To determine if you have a conflict of interest that should be disclosed for approval by your line manager or local Compliance Officer, ask yourself:

- Do I, or close family of mine, stand to benefit from my involvement in this situation?
- Could my participation in this activity interfere with my ability to do my job?
- Is the situation causing me to put my own interests ahead of Arcadis'?

When in doubt, always refer to your line manager or local Compliance Officer for guidance. Do update the company of any changes once the approval is granted.

Your responsibilities

Do

- ✔ Always act in the best interest of Arcadis.
- ✔ Avoid situations where your personal or professional interests (including of your close family) may conflict with your ability to act in the best interests of Arcadis or its clients.
- ✔ Inform your manager or local Compliance Officer of any actual or perceived conflict of interest, including any personal or professional interest you or your close family may have in any client, competitor, business partner or supplier of Arcadis.
- ✔ Exercise caution and seek prior local approval when accepting outside appointments, such as serving on a board of directors or other employment outside Arcadis.

Do not

- ✘ Do not put yourself in a position where you cannot be objective, for example in supervising a close family member or doing business with a company where they work or which they partially or fully own.
- ✘ Do not request, accept or receive any personal fee, commission or other benefit for introducing or referring any Arcadis client or supplier to other third parties.
- ✘ Do not use Arcadis resources or time to perform work for other employer(s) or conduct any outside business during work time for Arcadis.
- ✘ Do not continue when you know or are unsure whether a conflict of interest situation has arisen or could arise.

Further information for employees is available on the Arcadis Intranet

[Compliance Management System](#), [Global Conflicts of Interest Policy](#), [Guidance on Public Procurement and contact with Public Employees](#), [Local Conflicts of Interest Policy](#), [Global Recruitment Policy](#), [Arcadis Integrity Line for employees](#)

Definitions

Close family includes direct family members, such as parents, spouse, children and siblings.

Chapter 2.4

Anti-money laundering

Anti-money laundering refers to the laws, regulations and procedures intended to prevent people from disguising or concealing the origins of illegally obtained funds so that those funds appear to be legitimate income originating from legitimate sources.

We comply with applicable anti-money laundering and counter terrorism financing laws. We only accept funds from legitimate sources and such funds will not be used by Arcadis in violation of applicable anti-bribery, anti-corruption and anti-money laundering laws. We conduct business only with reputable third parties including clients, suppliers or business partners that do business legitimately.

We should all remain vigilant of any unusual or suspicious activities which may be indicators of money laundering, such as:

- Third party arrangements that do not appear to have a clear business rationale and purpose.
- Involvement of a third party which does not appear to have the appropriate experience and track record for delivering the services it is offering or where its true ownership is not apparent.
- Payments made or received from countries unrelated to the transaction or considered to be tax havens or offshore jurisdictions.
- Attempts to make payments in cash or cash equivalent.
- Payments made by a third party not involved in the contract or an account other than the normal business account relationship.

Your responsibilities

Do

- ☑ Follow third party due diligence requirements prior to entering into a new client or other third party relationship so that we know who we are doing business with and monitor over time.
- ☑ Report knowledge or suspicion that you may have about improper conduct or unusual or suspicious activities, such as large cash payments, proposals to evade tax, which may indicate criminal activity like money laundering to your Compliance Officer, so that appropriate actions can be taken.

Do not

- ☒ Do not knowingly deal with criminals, suspected criminals, or the proceeds of crime.
- ☒ Do not facilitate the acquiring, ownership, or control of criminal property or hide its origin or nature.
- ☒ Do not directly or indirectly facilitate a third party to evade tax.
- ☒ Do not agree to make payments to anyone in cash, or to offshore entities, or to unverified account numbers.

Further information for employees is available on the Arcadis Intranet

[Compliance Management System](#), [Specific Anti-Corruption Standards \(SACS\)](#), [Standard on Restricted Countries and Individuals](#), [Engaging with Third Parties Standard](#), [Global Tax Principles](#), [AGBP Issue Reporting and Handling Procedure](#), [Arcadis Integrity Line for employees \(anonymous\)](#)

Definitions

Proceeds of crime is the term given to money or assets gained by criminals during the course of their criminal activity.

Terrorist financing involves the solicitation, collection or provision of funds with the intention that they may be used to support terrorist acts or organizations. Funds may stem from both legal and illicit sources. Counter-terrorism financing refers to laws, regulations and procedures intended to combat terrorism financing.

Chapter 2.5

Fair competition

Competition laws, also known as anti-trust laws, seek to protect clients, businesses and consumers by promoting free and fair competition amongst companies in the marketplace.

We support the principle of free enterprise and unrestricted competition as a basis for conducting our business and we observe applicable competition laws and regulations.

We expect Arcadians to play their part in combating anti-competitive practices.

These include:

- Anti-competitive agreements or understandings, such as price fixing, market or client sharing, output or capacity restrictions, bid rigging and collusive tendering and other cartel behavior.
- Directly or indirectly (via a third party) exchanging commercially sensitive information with competitors.
- Abusing market power.
- Failing to notify transactions that need to be notified to competition authorities.

Intended JVs (one-off, structural, with competitors, with eco-system partners, etc) are subject to prior review by Legal.

Your responsibilities

Do

- ✔ Use clear, truthful and appropriate language in all communications and representations (including emails, and other written or verbal messages) with competition law requirements in mind to avoid the risk that your intentions being misinterpreted.
- ✔ Refuse to participate in any discussions with competitors about prices, clients, suppliers, output/capacity and contract terms without first seeking approval from Legal.
- ✔ Leave industry meetings or other formal or informal events and do not take part if competitively sensitive issues arise. Ensure your departure is noted and immediately report the matter to your local Compliance Officer.
- ✔ Report any concerns you have about improper conduct, any suspicion of any potentially anti-competitive practices or if you are uncertain whether or not practices are legal to your Compliance Officer
- ✔ Comply with local requirements relating to competition laws including filling requirements.

Do not

- ⊗ Do not discuss business strategies, price, or deal terms with competitors, whether formally or informally.
- ⊗ Do not share or receive competitively sensitive information such as confidential bid or proposal terms with competitors or other external parties unauthorized to receive such information or use competitively sensitive information related to an upcoming or ongoing bidding process.
- ⊗ Do not agree, formally or informally, with competitors or other third parties to refuse to deal with a client or supplier or to divide or allocate work, clients or markets or restrict or limit output or capacity.
- ⊗ Do not choose to withdraw a bid, submit an artificial bid or not to submit a bid to influence the outcome of a tender process.

Further information for employees is available on the Arcadis Intranet

[Compliance Management System](#), [Global Guidance on Competition Law](#)

Definitions

Competitively sensitive information: this includes, but is not limited to, any actual or intended pricing and price elements (such as base costs, extras, discounts, payment terms), other project tender or contract terms (such as scope and liability clauses), business or other strategic plans and/or other sensitive business information regarding individual clients or suppliers, secret know-how all insofar not already in the public domain.

Competitor: actual or potential competitor. A company is considered a competitor if it is active in the same relevant market as Arcadis. A company is treated as a potential competitor of Arcadis if in case of a small but permanent increase in relative prices it is likely that the former, within a relatively short period of time (which can be a couple of years), would undertake the necessary additional investments or other necessary switching costs to enter the relevant market on which Arcadis is active.

Chapter 2.6

Sanctions and trade compliance

Laws governing trade are complex. Arcadis conducts its business in compliance with all laws controlling the import, export and general trading of goods, technology, including software, transactions, or other dealings with third parties, wherever we do business.

Sanctions are laws that prohibit or restrict Arcadis from doing business with certain countries, organizations or individuals to protect national security and foreign policy interests. These prohibitions and restrictions are generally aimed at preventing trade and co-operation with regimes governing those countries or certain key persons or entities from those countries.

Trade Compliance, also called export controls, are prohibitions or trade limitations put in place by governments to control the export of sensitive material from one country to another. Often an authorization or licence must be obtained before exporting.

Export controls generally apply on the transfer of certain goods, equipment, technology and software between countries and to the end-use of a product or project. Restrictions may depend on the end-use or end-user.

Breaches of sanctions or export controls can have major consequences for Arcadis (and you), including (criminal) prosecution, substantial fines, imprisonment of leaders/key people, debarment and 'naming and shaming'.

To help our people navigate this complex topic, Arcadis has provided an excluded list and a restricted list in the 'Standard on restricted countries and individuals'. Arcadis does not allow employees to render services or sell products including software in countries that are on the excluded list. To conduct business in a restricted country you are required to obtain prior approval by management, legal and risk using the "Submission form: projects in Restricted Countries", found on the Arcadis Risk and Control (ARC) Framework.

Your responsibilities

Do

- ✔ Remember to frequently check the excluded list and restricted list in the Standard on Restricted Countries and Individuals, as the comprehensively sanctioned countries and individuals have changed multiple times in the last few years.
- ✔ When your pursuit or project is related to a restricted country, entity or individual, you must request pre-approval of management, legal and risk, using the "submission form: projects in Restricted Countries", found on the internal Arcadis Risk and Control (ARC) Framework and monitor thereafter to ensure they are not on the sanctions lists.
- ✔ Be mindful of export controls when you transfer goods, equipment, technology or software between countries and contact your local legal team before you proceed.
- ✔ Think carefully before taking sensitive materials abroad including on your laptop or logging into systems from abroad (outside of the normal workplace).

Do not

- ⊗ Do not conduct business in countries on the excluded list or with entities or individuals on the sanctions lists.
- ⊗ Do not forget to monitor your pursuit or project on any change in relation to restricted countries, entities or individuals.

Further information for employees is available on the Arcadis Intranet

[Compliance Management System](#), [Standard on Restricted Countries and Individuals](#), [Submission form: Projects in Restricted Countries on ARC Framework](#)

Definitions

Trade Compliance laws (also called export controls) impose restrictions on the transfer of certain goods, equipment, technology and software between countries.

Chapter 2.7

Engaging with third parties

Arcadis is committed to meeting the highest standards of business conduct and we embrace sustainability in all that we do. These commitments extend to our supply chain. We want to work with third parties who share our values and culture of integrity. We expect them to comply with this AGBP or equivalent principles and our Global Supplier Code of Conduct.

Arcadis values a collaborative approach with our clients, suppliers and business partners, in respect of innovative and sustainable solutions.

We conduct due diligence checks on our clients, suppliers, and business partners. We communicate our expectations, monitor performance, and address any issues. This includes withdrawing from contracts if our standards are not being met.

We work innovatively with suppliers and partners to procure goods and services sustainably and ethically. We treat our supply chain fairly and consistently, and we pay them in line with contractual obligations.

Arcadis has been a member of the UN Global Compact (UNGC) since 2009 and is committed to both its objectives as well as the ten UNGC universal principles regarding human rights, labor standards, environmental stewardship, and anticorruption.

Your responsibilities

Do

- ✔ Ensure that the third parties you engage on behalf of Arcadis are legitimate service providers that have a good reputation and are known to act with integrity. This should be monitored over time.
- ✔ Before engaging any third party undertake appropriate checks and due diligence.
- ✔ Provide suppliers with a copy of the AGBP and Global Supplier Code of Conduct. Operating in compliance with these principles or equivalent should be a term of their appointment. A violation of them should be cause for termination.
- ✔ Be especially cautious when you engage any third party who, as part of their scope of services, is authorized to represent Arcadis externally. We could be held liable for their actions as though we performed them ourselves. They will be treated as an agent and should only be appointed with the support of your local legal team and will be subject to approval in accordance with our governance requirements.

Do not

- ✘ Do not make a payment to a third party other than as contractually agreed or make a payment to a party other than the contracting party named in the agreement.
- ✘ Do not agree to make payments to anyone in cash, or to offshore entities, or to unverified account numbers.
- ✘ Do not make a payment to a third party if you know or suspect that they may use or offer some or all the payment directly or indirectly as a bribe.
- ✘ Do not underestimate the importance of confirming in writing agreements, variations to contracts and key discussions.
- ✘ Do not use a third party to do anything contrary to this AGBP.

Further information for employees is available on the Arcadis Intranet

[Compliance Management System](#), [Specific Anti-Corruption Standards](#), [Engaging with Third Parties Standard](#), [Global Supplier Code of Conduct](#), [Global Procurement Policy](#), [Global Human Rights and Labor Policy](#), [Local Modern Slavery Policy](#)

Definitions

Due diligence is the investigation or exercise of care that a reasonable business or person is normally expected to take before entering into an agreement or contract with another party. This usually is carried out by making certain enquiries on the third party to understand who we are doing business with.

Chapter 2.8

Political activities, lobbying and donations

Public officials and political parties

Arcadis and its employees will not make, offer or promise anything of value to any person, including but not limited to (public) officials or employees of public international organizations, political parties or candidates for such organizations or parties, or to any employee or representative of any (prospective) client or supplier to obtain or retain business, to secure an improper advantage, or for any other improper purpose or to influence decision-making in Arcadis' favor.

Lobbying

Lobbying includes any oral or written communication, on behalf of Arcadis, with a (public) official, their staff, or a public organization to influence that person or organization's decision-making on any policy matter (such as statutes, regulations, programs, contracts, grants, licenses, etc.). Contact your legal department before initiating any communication with such persons or organizations that may be or may seem to constitute lobbying.

Charitable donations

Arcadis has a strong legacy of partnering with charitable organizations to give back to the communities in which we live and work. We want to ensure our philanthropy cannot be misconstrued and that we contribute in the right way. Prior approval by local management is required for proposed charitable donations so that we can demonstrate transparency and accountability in our charitable giving choices.

Your responsibilities

Do

- ✔ Personal political volunteering can be done in personal time, not during Arcadis working hours.
- ✔ Contact the legal department before conducting any activities that may constitute lobbying.
- ✔ Seek prior approval from local management for any proposed charitable donations on behalf of Arcadis. Be aware of the potential for them to be a form of bribery.

Do not

- ⊗ Do not make, offer, or promise anything that may be construed as a political donation on behalf of Arcadis. Arcadis will not approve or reimburse such activity.

Further information for employees is available on the Arcadis Intranet

[Compliance Management System](#).

Local policies on gifts and hospitality, political activities/contributions and (charitable) donations

Definitions

Public official or official is an employee or official of an public (international) organization, or government or government entity who carries out a public function, whether or not such person is employed, seconded, self-employed, elected, or appointed. For instance, where a public service is outsourced to a privacy contractor, such contractor could be regarded as "public official", as well as members of political parties or candidates for political office could be regarded as government officials.

Chapter 2.9

Protecting the environment

Public officials and political parties

Arcadis is committed to being a leader in sustainable business behavior and outcomes. This commitment underpins Arcadis' global ambition: Improving quality of life for all.

We strive to develop innovative solutions that protect the planet and promote a sustainable world today and for generations to come. It is our ambition to maximize positive impact on society, the environment and on biodiversity. We do this through the projects we undertake for our clients, in our own business operations, and by empowering our people and engaging with the communities where we live and work.

We follow generally accepted global standards for sustainable business conduct and report our own progress in sustainability in an Annual Integrated Report. We believe the global effort to create a more circular, sustainable, and equitable economy and to maintain a biodiverse world is a journey in which Arcadis can play a leading role.

Our efforts in sustainability are guided by the United Nations Global Compact and the United Nations Sustainable Development Goals and are supported by our membership in organizations like the World Business Council for Sustainable Development and the Science Based Targets Network.

Our Global Environmental Management System Standard (EMSS) is one of the measures put in place to harmonize and standardize business processes that influence our environmental impact as a global company and minimize our carbon footprint.

The EMSS is a systematic management system framework for continuously improving environmental performance, increasing energy efficiency, and reducing costs. Our people are trained in the different components of the standard to help us reach our environmental targets and understand their role in facilitating the proper implementation and maintenance of local environmental management systems.

Your responsibilities

Do

- ✔ Support the embedding of sustainability as part of our business operations to reduce harm to the environment, society, and the economy, while improving quality of life for all.
- ✔ Play your role to support our clients' ambitions by delivering solutions that maximize benefits for people, environment and the climate.

Do not

- ⊗ Do not engage with clients or in projects without assessing whether the outcomes are sustainable.
- ⊗ Do not use fossil-based travel modes if more sustainable alternatives are available.

Further information for employees is available on the Arcadis Intranet

[Global Sustainability Policy](#), [Global Environmental Management System Standard \(EMSS\)](#)

Definitions

EMSS: Global Environmental Management System Standard.

Chapter 2.10

Social value

Arcadis' vision is improving quality of life for all. Our drive to do so is based on a fundamental belief that corporate policies and practices should not only enhance the competitiveness of our clients and our business but should simultaneously advance social, environmental, and economic prosperity at a community level.

Social value at community level includes:

- The economic legacy we leave when working locally.
- The environmental and social justice legacy we leave through creative and sensitive design and delivery of services, working to ensure we have a positive impact.
- Our contribution to the local community engagement aspect of sustainability such as collaborative working with schools, community groups and charities.

- Our wellbeing and people focused approach to business, supporting our people to excel at work, be who they are and contribute to their own societies and communities.
- Our contribution to meeting UN Sustainable Development Goals.

Many of our people are involved in volunteer programs or contribute to our corporate programs such as the Shelter cooperation with UN Habitat or the Local Sparks program, which is run together with the Lovinklaan Foundation and the KNHM Foundation.

Lovinklaan Foundation

Lovinklaan Foundation is a foundation led and managed by Arcadis employees and is the largest shareholder in Arcadis NV.

Lovinklaan's purpose is to invest in Arcadis and Arcadians to empower them to reach their full potential and drive meaningful change.

Further information for employees is available on the Arcadis Intranet

[Global Sustainability Policy](#), [Global Diversity & Inclusion Policy](#), [Global Human Rights and Labor Policy](#), [Global Tax Principles](#), [Lovinklaan Foundation](#)

Chapter 2.11

Arcadis Risk and Control (ARC) Framework

Exposure to risk is unavoidable in pursuit of the Arcadis strategy. Well controlled risks can present new opportunities, resulting in value creation. However, uncontrolled risks can hinder the achievement of long-term strategic objectives and Arcadis' ability to succeed.

The Arcadis Risk and Control (ARC) framework enables a culture of risk awareness across the organization by identifying risks and defining controls which mitigate or manage these risks in line with Arcadis' risk appetite. It helps Arcadis' leadership identify, evaluate, communicate, and address risks.

The ARC Framework identifies 15 key risks, divided into three risk categories – Strategic, Operational and Compliance. It includes the business controls which are supported by policies, standards, procedures, and guidelines, all of which target risk mitigation in accordance with Arcadis' risk appetite and the successful pursuit of our strategy.

The ARC Framework is the cornerstone of the Arcadis risk management approach and supports Arcadis in embedding a more risk conscious way of working in all layers of the organization.

The ARC Framework also includes controls to mitigate the risk of non-compliance with laws and regulations in the jurisdictions in which Arcadis operates, as well as with Arcadis' internal authority schemes and other company standards, policies, and guidelines.

Fraud risk

Arcadis completes a Fraud Risk Assessment (FRA) in each business area annually. The objective of the self-assessment is to give leadership a deeper understanding into the extent of fraud risk and the effectiveness of mitigating controls, and to highlight where further intervention, controls or other improvements may be required.

Your responsibilities

Do

- ✔ Be aware of the ARC Framework and related Global Policies and where to find these on the intranet.
- ✔ Be aware of the risks and business controls related to your area of work and where on the intranet to find your local policies.
- ✔ Ensure that you and your teams understand their responsibilities regarding the ARC framework.
- ✔ Assess compliance with the ARC framework in employee performance reviews.
- ✔ Be alert to red flags of fraud or fraudulent schemes, such as overstated expenses or invoices, misrepresentation of costs to complete or misuse of Arcadis assets for personal use.

Do not

- ⊗ Do not fail to comply with the ARC framework in your role.

Further information for employees is available on the Arcadis Intranet

[Arcadis Risk and Control \(ARC\) Framework](#), [Finance and Group Reporting webpage](#)

Definitions

Risk: involves uncertainty about the effects/implications of an activity with respect to achieving strategic, operational and regulatory objectives.

Control: actions taken to eliminate, prevent or reduce the occurrence of an identified risk.

Risk Appetite: how much risk we are willing to accept in pursuit of our strategic objectives.

Arcadis' Risk and Control (ARC) framework: is a repository of key risks that pose a threat to Arcadis, as well as the controls (and associated policies) in place to mitigate those risks.

Fraud: is the misappropriation of assets or manipulation of financial or other relevant statements with the intention to deceive and obtain a financial or non-financial benefit from Arcadis or a related third party.

Chapter 3

How we protect our assets and our data

Chapter 3.1

Information security

Arcadis is committed to protecting information we control and are processing and our assets against loss, operational discontinuity, misuse, unauthorized disclosure, inaccessibility, and damage.

This objective is supported by a framework of Information Security policies and standards which is regularly updated in line with internal and external threats, like human errors, omissions, fraud, accidents, and intentional damage.

Arcadis is committed to complying with the Information Security Policy Framework and to keeping safeguards up to date within the areas of Operational Technology and Information Technology (OT and IT), Internet of Things (IoT), physical workplace, business processes and human behavior.

Your responsibilities

Do

- ✔ Familiarize yourself with the Information Security Policy Framework and attend regular trainings and awareness sessions.
- ✔ Ensure you properly use and protect Arcadis' information and the information we receive from our client(s).
- ✔ Ensure you properly use and protect Arcadis' assets like laptops, tablets, and mobile smart phones.
- ✔ Report theft or loss of information or company assets immediately to your line manager or to the IT Service Desk.

Do not

- ⊗ Do not use Arcadis' information or information that is obtained from our client(s) for your personal benefit.
- ⊗ Do not use company assets – like your laptop, tablet or mobile smart phone – for more than incidental personal use (as defined by the Arcadis IT Guide).
- ⊗ Do not reuse passwords between your work and home systems.

Further information for employees is available on the Arcadis Intranet

[Information Security Policy Framework](#), [Arcadis IT Guide](#), [Global IT Service Desk 24/7](#)

Definitions

Information Security is the protection of information against loss, operational discontinuity, misuse, unauthorised disclosure, inaccessibility or damage.

Chapter 3.2

Privacy and personal data protection

Arcadis is committed to the careful collection and use of personal data.

Six privacy rules

Arcadis applies Six Privacy Rules, which have been designed to protect the personal data of our people, as well as our clients, suppliers and business partners. These rules cover the privacy principles of (i) lawfulness, fairness, and transparency; (ii) purpose limitation; (iii) data minimisation & accuracy; (iv) storage limitation; (v) security and confidentiality; and, (vi) accountability & audits.

We use a three-steps behavioral framework to think of and act on personal data protection: Identify, Assess, Act & Monitor. You must take extra care when processing privacy sensitive data.

These Six Privacy Rules are in line with the EU General Data Protection Regulation (GDPR) and our set of global Privacy Standards and may be supplemented by relevant local privacy laws.

Your responsibilities

Do

- ✔ Familiarize yourself with the Six Privacy Rules and attend regular trainings and awareness sessions.
- ✔ If you need to keep personal data, take Your responsibilities and to keep the data safe and always ensure it is protected with the right user permissions and passwords.
- ✔ Destroy personal data that you have collected when you no longer need it.
- ✔ Report suspected or actual personal data security incidents immediately to the IT Service Desk or your Privacy Officer.

Do not

- ⊗ Do not collect or share personal data unless you absolutely must for a specific purpose.
- ⊗ Do not forget that a positive client experience and digital leadership go hand in hand with compliance with mandatory privacy requirements.

Further information for employees is available on the Arcadis Intranet

[Privacy Management System](#), [Six Privacy Principles](#), [Privacy Standards for Employee Data](#), [Privacy Standards for Client, Supplier and Business Partner Data](#), [Privacy Standard for Processing Personal Data of Client Individuals](#)

Definitions

Personal data is any information from which you can directly or indirectly identify someone, or as otherwise defined under applicable law.

Privacy sensitive data is a category of Personal Data described in the set of Privacy Standards and includes data on health, religion, race, ethnic origin, criminal or unlawful behavior, and political beliefs.

GDPR is the General Data Protection Regulation effective in the European Union since May 2018. Arcadis Privacy Rules and Standards are compliant with this regulation and apply to the Arcadis group companies.

Chapter 3.3

Accurate records and business controls

Arcadis as a listed company, must properly document financial, project and business records and statements, and accurately reflect all assets and liabilities and transactions of the company and ensure compliance with financial, legal and business obligations.

Financial records and reporting

Our financial records and reporting must comply with Arcadis Generally Accepted Accounting Principles (AGAAP) and be accurate, complete, and timely. Our Financial Reporting Control framework (FRCs) consists of policies and control procedures to assess financial statement risk and provide reasonable assurance that Arcadis prepares reliable financial statements.

Arcadis leaders have a role to ensure that adequate resources and governance are in place on all aspects of our business operations, including financial controls on projects and within Arcadis operating entities.

Non-Financial Reporting (NFR)

Our stakeholder engagement efforts are transparent and inclusive. These principles underpin our non-financial reporting, which is in line with the EU Directive on the disclosure of non-financial information. NFR is included in the Arcadis' Annual Integrated Report.

Your responsibilities

Do

- ✔ Keep and store records of your (trans)actions in an accurate and transparent manner and in accordance with applicable procedures, process controls, the information classification standard and local legislation.
- ✔ Treat and retain information in line with the security classification of the information.
- ✔ Ensure that the financial records of your operations and projects are compliant with Arcadis Generally Accepted Accounting Principles (AGAAP) and are accurate, complete, and timely.
- ✔ Ensure that deviations from AGAAP are discussed, documented and agreed with Group Reporting.

Do not

- ⊗ Do not establish or maintain unrecorded funds or assets, overstate expenses or inflate costs to complete.
- ⊗ Do not store company records on personal devices.

Further information for employees is available on the Arcadis Intranet

[AGAAP Arcadis Generally Accepted Accounting Principles, Information Classification Standard, Non-Financial Reporting webpage, Global Tax Principles](#)

Definitions

AGAAP Arcadis Generally Accepted Accounting Principles are the accounting policies to be applied by all Arcadis entities in their financial reporting to Corporate. AGAAP is based on International Financial Reporting Standards (IFRS).

Fraud is the misappropriation of assets or manipulation of financial or other relevant statements with the intention to deceive and obtain a financial or non-financial benefit from Arcadis or a related third party.

Controlled documents: ISO certifications and government regulations require that Arcadis controls selected documents, such as Global Policies and Standards. The content of these documents is controlled using a document management change, approval and storage process.

Chapter 3.4

Social media and media communications

Social media can bring significant benefits to Arcadis, particularly for building relationships with current and potential clients.

It is important that employees who use social media within the company do so in a way that enhances Arcadis' image and reputation and provides benefits to the business. A misjudged post can generate complaints, claims and fines or damage to the company's reputation. There are also security, competition law and (personal) data protection issues to consider.

A small number of general ground rules apply with regard to Arcadis' relationships with the media, as outlined in the Arcadis Media Manual.

Your responsibilities

Do

- ✔ Ensure your social media use is in line with our core values and behaviors.
- ✔ Contact the Global Marketing & Communications (Marcoms) Team and obtain any required approvals when you would like to use social media, open a social media account in Arcadis' name or communicate in Arcadis' name with the media.
- ✔ When using your personal social media channels, and where the content relates to Arcadis, follow the simple engagement rules, outlined in the Global Social Media Standard.

Do not

- ⊗ Do not use your Arcadis email address for personal social media (i.e. LinkedIn, Twitter, Instagram, Facebook etc.).
- ⊗ Do not speak with the media if you are not appointed as the approved Arcadis spokesperson.
- ⊗ Do not post it, if unsure.

Further information for employees is available on the Arcadis Intranet

[Global Social Media Standard, Acceptable Use Standard, Arcadis Media Manual](#)

Definitions

Social media sites and services may include (but are not limited to):

- Social networks
- Photographic social networks
- Professional social networks
- Video sharing networks
- Media sharing platforms
- Social media services and instant messaging tools provided by the Arcadis Tech/IT department.

Chapter 3.5**Inside information and insider trading**

We comply with national and international laws on insider dealing. If you possess inside information about Arcadis (or any other company listed on a stock exchange), these laws prohibit you from sharing it with anyone, unless it is strictly necessary for the performance of your daily work. It is also illegal to transact, or to encourage others to transact, in shares of that company.

Examples of inside information may include information relating to financial results, large acquisitions, changes in senior management, plans to enter new markets or significant developments in litigation.

Insider trading rules are complex, and a breach may be an administrative as well as a criminal offence with potential sanctions including fines and imprisonment.

The “Regulations regarding Transactions in Arcadis Securities” outline the rules regarding trading or transactions in Arcadis securities. These Regulations apply to all Arcadians.

If you regularly work with (potential) inside information regarding Arcadis, you will be included on the General Insiders List. If you are on this list, you should be conscious of the additional obligations applicable to you.

Your responsibilities**Do**

- ✔ Always treat confidential information, in particular inside information, with extra care. Share this information only when strictly necessary to carry out your daily work.
- ✔ Make sure you have read and understood the insider trading obligations that apply to you. Different rules apply for different roles within Arcadis. They are outlined in the “Regulations regarding Transactions in Arcadis securities”.
- ✔ Raise a concern with the Company Secretary of Arcadis NV or speak up immediately when you become aware of the disclosure of inside information or insider trading taking place, or the suspicion of it.

Do not

- ✘ Do not trade in shares or other securities of Arcadis or any other company listed on a stock exchange if you have inside information. Tipping others to do so is also prohibited.
- ✘ Do not trade in Arcadis shares or other securities during closed periods when you are on the General Insider List.
- ✘ Do not wait to seek advice immediately from the Company Secretary of Arcadis NV in case you come into possession of inside information when you are not included on the general insiders list.

Further information for employees is available on the Arcadis Intranet

[Regulations regarding Transactions in Arcadis Securities](#), [Arcadis Public Disclosure Policy](#), [Arcadis Closed Periods webpage](#)

Definitions

Inside information is information regarding Arcadis or any other listed company and/or its shares or other securities that: (i) could have a significant effect on the price of Arcadis shares, (ii) relates directly or indirectly to Arcadis, (iii) is of a precise nature, and (iv) has not been made public.

Closed periods are periods immediately preceding the publication of quarterly financial results. During these periods, so-called general insiders are prohibited from trading.

General insiders list is a list of insiders maintained by the Company Secretary of Arcadis NV and includes employees who are likely to have key information on the overall financial results of Arcadis.

Tipping is advising others to buy, sell or keep all listed shares or other securities while in the possession of inside information.

Chapter 4

How we work together

Chapter 4.1

Human rights and labor policy

Our 'Maximizing Impact' strategy essentially rests on two pillars: taking care of people and planet. Foundational to focusing on people is treating them with dignity and respect, something on which Arcadis has based its purpose – Improving Quality of Life. Understanding that society increasingly expects businesses to respect human rights, Arcadis has chosen to align with the international standard that guides how companies should act, known as the UN Guiding Principles on Business and Human Rights (UNGPs).

Our commitment to human rights

Our commitment to respect human rights is confirmed in our Human Rights and Labor policy and refers to international standards including the UNGPs, International Bill of Human Rights, and the International Labour Organizations (ILO) Declaration on Fundamental Principles and Rights at Work and its core Conventions, e.g. on forced labor.

We believe that we have a responsibility to respect all human rights and to seek to avoid any negative impacts of our business and contribute to the positive impacts of our business on people. We expect all our employees, management, individuals working for Arcadis (whether directly or through a third party contract), clients, suppliers, and business partners to respect human rights.

Human rights due diligence

Our commitment to respect human rights includes implementing a human rights due diligence process to prevent, mitigate, and remediate any negative human rights impacts caused by, contributed to, or linked to our business activities. We expect our business partners to have the same commitment.

Your responsibilities

Do

- ✔ Be aware of guidance and tools on our human rights intranet page by work area (i.e. Clients, Arcadians, procurement), for example the supplier code of conduct when working with suppliers.
- ✔ If you suspect human rights related misconduct or irregularities, please speak-up and report this using the AGBP reporting procedure or anonymous via the Integrity Line.

Do not

- ⊗ Do not ignore your intuition when you feel that human rights are not being respected, in our own operations or via our business partners.
- ⊗ Do not ignore information on human rights risks and/or impacts in our own operations or those occurring via our business partners.

Further information for employees is available on the Arcadis Intranet

[Global Human Rights and Labor Policy](#), [Diversity, Belonging & Human Rights Intranet](#), [Arcadis Integrity Line for employees](#)

Definitions

UNGP United Nations Guiding Principles on Business and Human Rights.

Chapter 4.2

Diversity, equity, inclusion and belonging

People first culture

At Arcadis we recognize our critical role in developing diverse and inclusive environments. Treating individuals with dignity and respect is the basis of our company's core value – People First. Putting people first means taking a human-centric approach, which supports our passion for improving quality of life.

Our ultimate objective is to ensure every Arcadian feels they belong and can succeed at Arcadis, where differences among Arcadians are recognized, valued, celebrated, and seen as an asset.

We are also creating diverse and inclusive workplace environments and equal employment opportunities as a foundation to delivering great client experiences, while meeting diverse client needs and expectations.

Our commitment

Our commitment is to set a culture of diversity, equity, inclusion and belonging to create an organization in which employees from all backgrounds feel welcome and safe, can be themselves and are given the space and recognition they need, while using their talent and skills to foster their development and their clients' success. Developing a culture of belonging and creating an engaging, effortless employee experience is high on our agenda.

Arcadis is taking steps towards building a more inclusive workplace that accurately reflects the communities in which we live and work. We recognize that this sets a strong foundation for diversity to challenge inequity, and we seek to create exceptional workplace environments for our people that attract, retain, and develop top talent.

Your responsibilities

Do

- ✔ Respect the dignity and diversity of all individuals, including colleagues and any other individuals that you might encounter during work.
- ✔ Enhance your own and other Arcadians' awareness of conscious and unconscious bias and how that might hinder the ability to be more inclusive and collaborative with one another by attending regular trainings and awareness courses.
- ✔ Report or raise a concern or when made aware of situations in which an Arcadian has been or might be subjected to discrimination, harassment, bullying, or victimisation using the AGBP reporting procedure or anonymously via the Integrity Line.
- ✔ Consistently display inclusive behaviors that solicit and value all perspectives and take a human-centric, inclusive and equitable approach to the design of our organizational ways of working, processes, and client solutions.

Do not

- ⊗ Do not breach the Human Rights and Labor Global Policy and/ or any related policies. This may result in disciplinary action following local country legislation and country practices, up to and including termination of employment.

Further information for employees is available on the Arcadis Intranet

[Global Human Rights and Labor Policy](#), [Diversity, Belonging & Human Rights Intranet](#), [Arcadis Integrity Line for employees \(anonymous\)](#), [Local People \(HR\) Policy Manual](#)

Definitions

Bias is a set of assumptions in favor of or against one thing, individual or group compared with another, usually in a way that is considered to be unfair. Biases can be conscious (known as explicit bias), or outside conscious awareness identified as unconscious (known as implicit bias).

Chapter 4.3

Harassment, bullying and discrimination

We believe that equal treatment of all employees, as defined in the International Labour Organization (ILO) conventions, is a fundamental principle. An important area of our change journey towards achieving our Diversity, Belonging and Human Rights (DBHR) mission, is our Golden Thread of Dignity, Respect and Anti-Discrimination.

Our ultimate objective is to ensure every Arcadian feels they belong and can succeed at Arcadis in an environment where differences among Arcadians are recognized, valued, celebrated, and seen as an asset.

Arcadis does not tolerate any form of discrimination, harassment, victimization or otherwise disrespectful or inappropriate behavior, unfair treatment, or retaliation of any kind in the workplace and any work-related setting.

“We stand up against any form of discrimination, not only to show solidarity but to create an environment in which everybody feels safe to work and live. We want you to show up as the person you are, with all your uniqueness.”

Peter Oosterveer, Arcadis Global CEO

We are dedicated to fostering diverse and inclusive environments that are free from discrimination or harassment based on visible and non-visible diversities, including but not limited to, race, national origin or ethnicity, gender identity, sexual orientation, marital status, age, social class, physical or mental ability, attributes, experiences, strengths, skills, perspectives, work styles, religious or ethical values system, citizenship status, veteran status, and political beliefs. We also aim to ensure that our services and solutions are free from discrimination and promote diversity, equity, inclusion and belonging.

Your responsibilities

Do

- ✔ If you experience any form of harassment, bullying or discrimination, know that you are not alone and there is support available to you – speak to a colleague, your Line Manager, your local People Function contact, your Compliance Officer or anonymously via the Arcadis Integrity Line.
- ✔ Treat all colleagues with dignity, respect and courtesy, contribute towards a positive and non-threatening working culture within Arcadis, while also challenging unacceptable behavior.

Do not

- ⊗ Arcadis does not tolerate discrimination, bullying, harassment or victimization/retaliation of any kind from anyone who works for us or with us, including clients and contractors. All allegations of discrimination, bullying, harassment or victimization/retaliation will be investigated as appropriate, and where required disciplinary action will be taken.
- ⊗ We will not tolerate retaliation against or victimization of a person for making allegations of bullying or harassment in good faith or supporting someone to make such a complaint.

Further information for employees is available on the Arcadis Intranet

[Diversity, Belonging & Human Rights Intranet](#), [Global Diversity and Inclusion Policy](#), [Global Human Rights and Labor Policy](#), [Global Employee Assistance Providers \(EAP\)](#)

Definitions

Bullying is offensive, malicious or insulting behavior, an abuse or misuse of power which is meant to/ has the effect of undermining, humiliating or injuring, or otherwise behaving unreasonably towards, an individual or group of individuals.

Harassment is unwanted behavior which has the purpose or effect of affecting an individual's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment and focuses on how the behavior is perceived and experienced by the recipient. This includes unwelcome conduct of a sexual nature.

Chapter 4.4

Workplace health and safety

At Arcadis, we strive to achieve zero incidents in everything we do, ensuring the health, safety, and wellbeing of our employees and stakeholders.

Our Health & Safety (H&S) Commitment and Standards, as included in the Global H&S Management System, set the minimum H&S requirements for conducting business at Arcadis. If considered necessary, in view of its local situation, culture, and assessed hazards and risk profile, each organization or country is permitted to adopt more stringent and/or more detailed H&S commitments and requirements.

TRACK is an acronym to help each of us do a quick assessment of what could hurt us.

It's your right and Your responsibilities

Everyone at Arcadis has the authority and responsibility to immediately stop their own work, or work which Arcadis controls, when it is believed that the health and safety hazards and risks are not recognized, understood, or being effectively managed and controlled. Arcadis management is committed to support anyone who exercises their **Stop Work Authority** in good faith.



Your responsibilities

Do

- ✔ Ensure that you and every member of your team goes home safely every day, no matter what your role in the company.
- ✔ When working in a new office or project site, use TRACK and ask yourself “What are the hazards?” Or “What has the potential to cause harm or damage?”
- ✔ If you are in doubt about the health and safety aspects of your workplace, use your ‘Stop Work Authority’ and inform your line manager, or practice “If not me, then who?”
- ✔ Ensure that you and your team are properly trained and have accomplished the necessary Health and Safety Planning needed before the start of an activity or event.
- ✔ Report all incidents, significant near misses, and unsafe acts and conditions immediately so that they can be investigated and corrected to prevent reoccurrence. Then share the lessons learned with other Arcadians.

Do not

- ✘ Do not hesitate to report any health and safety concern or near miss to your Line Manager or local H&S representative. Always remember that there will be no negative consequences or retaliation if incidents are reported in good faith.
- ✘ Do not start the work if you feel unsafe in the situation.
- ✘ Do not be afraid to stop the work if the working condition is not safe.

Further information for employees is available on the Arcadis Intranet

[Health & Safety Commitment](#), [Health & Safety Management System](#), [Local H&S Policy](#), [Stop Work Authority Standard HSG003](#), [TRACK Standard HSG037](#), [Guidance to reporting H&S incidents](#)

Definitions

TRACK is an acronym to help each of us do a quick assessment of what could hurt us.

“**If not me, then who?**” is the expectation that Arcadians will speak up if they perceive something to be amiss.

Chapter 4.5

Drugs and alcohol-free workplace

Abuse of alcohol, drugs, and controlled substances impairs employee judgement, resulting in increased safety risks, injuries and faulty decision-making.

Arcadis aims to ensure a safe, healthy and productive work environment by creating standards for drug and alcohol use in the workplace. Arcadis respects the right of employees to make personal choices. However, if these choices have an adverse impact on an employee's ability to work or on safety (of individuals or their work products), Arcadis will act in the interests of the company.

Should you be unfit for work through alcohol, drugs and/or solvent inhalation, this constitutes ground for disciplinary actions.

If approved by Local Leadership, a limited use of light alcoholic beverages may be permitted within an agreed time frame for certain activities, such as business sponsored events. Employees should refer to their local handbook or policy for specific guidance.

Confidential counselling support

We encourage any individual who uses illegal drugs, misuses prescribed drugs, or abuses other substances, medications or alcohol to seek help in overcoming their problem. Individuals are encouraged to ask for help at any time.

Each country has an Employee Assistance Provider (EAP), this is a 24/7 confidential service which is available to you to seek counselling support for any reason.

Your responsibilities

Do

- ✔ Be aware of your local alcohol and drugs policy and specific client requirements and local laws, in relation to drug and alcohol limits and testing.
- ✔ Behave safely and responsibly at any work or client social event where alcohol is available.
- ✔ If you believe you have, or are developing, a substance dependency you are encouraged to seek confidential counselling support voluntarily via EAP.

Do not

- ⊗ Do not forget that should you be unfit for work through alcohol, drugs and/or solvent inhalation, this may constitute ground for disciplinary actions.
- ⊗ Do not violate the local drug and alcohol policies, laws and regulations.

Further information for employees is available on the Arcadis Intranet

[Global Drugs & Alcohol Standard](#), [Local Drugs & Alcohol Policy](#), [Global Employee Assistance Providers \(EAP\)](#), [Global Travel Standard](#), [Global Gifts and Hospitality Policy](#)

Definitions

Employee Assistance Provider (EAP), is a confidential service which is available 24hours/7days to Arcadians to seek counselling support for any reason.

Chapter 5

Your AGBP decision making tool

Chapter 5

Your AGBP decision making tool

The AGBP is not exhaustive

The purpose of the AGBP is to ensure that all Arcadians, as well as third parties with whom we work, have a clear understanding of the core values and principles that we want to uphold. The AGBP reflect and further embody our core value of Integrity.

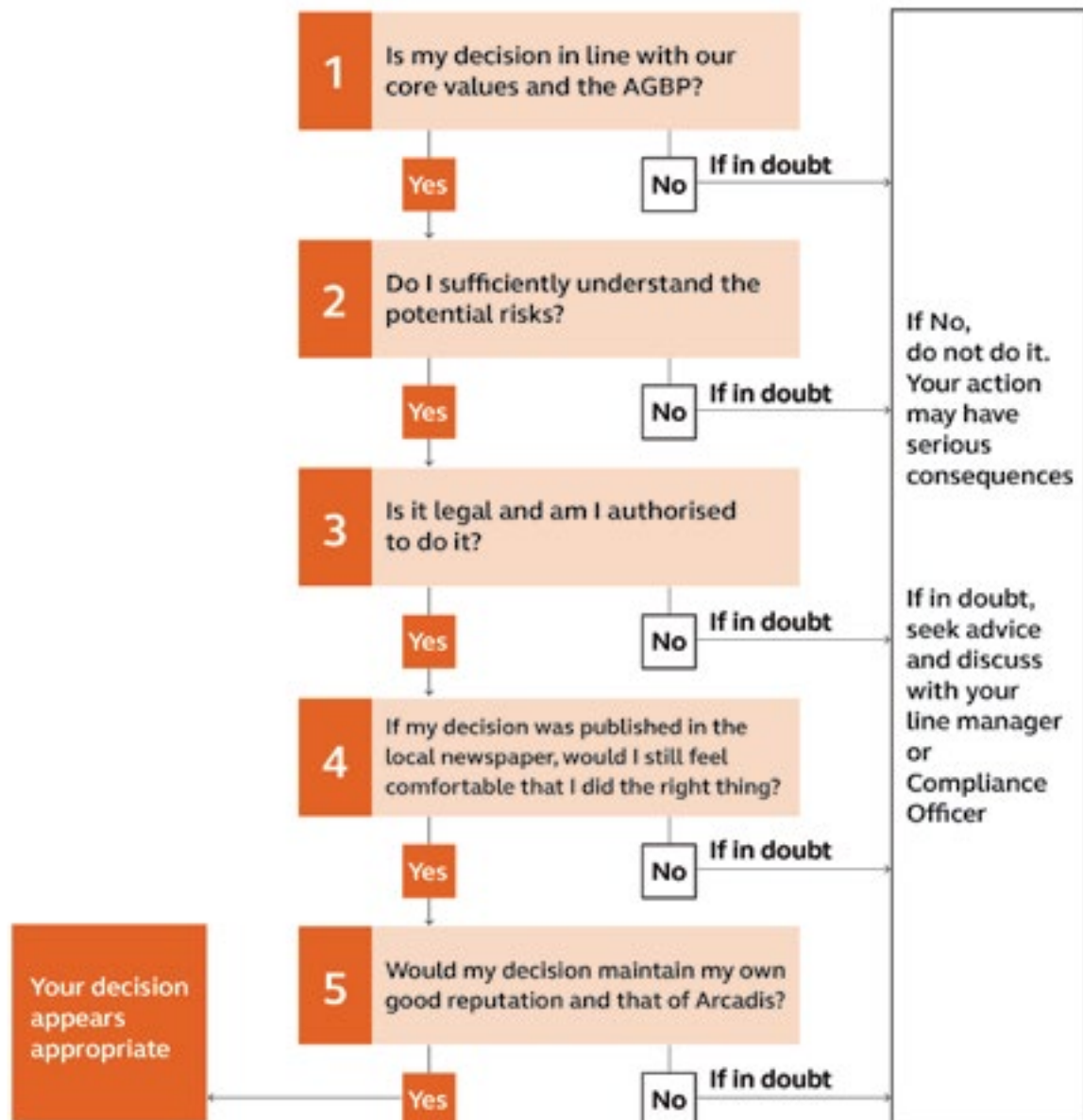
The AGBP and the related global and local Policies and Standards, cannot directly cover every situation or dilemma that may arise. We must therefore use sound judgement to take the right decision when being faced with specific situations and dilemmas.

You can always ask for help from your line manager, local Compliance Officer, the Global Compliance Office, Legal or the People function. Alternatively, and if you wish to remain anonymous, you can contact the Arcadis Integrity Line.

AGBP decision making tool

To assist you and your team in handling dilemmas, where the “right thing” is not so obvious, the AGBP decision making tool outlined below, sets out the key questions you can ask yourself, to determine whether a particular course of action is consistent with our core values and our AGBP.

You or your team may face situations or dilemmas where you are not sure what to do or Arcadis does not have a specific policy or standard. If so, ask yourself these questions to help you make the right decision and do the right thing:



Chapter 6

Seek advice and speak up

Chapter 6

Seek advice and speak up

Your responsibilities

The Arcadis General Business Principles (AGBP) are not optional, and you are expected to always apply them. Please use the AGBP to understand the responsibilities relevant to your role and be particularly mindful of the AGBP when you change roles, this may expose you to risks you were not previously aware of. Your personal commitment to integrity and compliance is essential to keep you and all Arcadians safe, to protect the future of Arcadis and ensure our continued success.

It starts with each and every one of us. Our behavior creates the integrity and compliance culture of our company and underlines our commitment to creating a sustainable future. This is the responsibility of each individual employee.

For management there are additional responsibilities, as we are committed to creating and upholding a culture in which employees feel encouraged and safe to raise concerns or complaints.

You suspect a violation

If you suspect a violation of our core values, the AGBP or other policies, local laws and regulations, you are empowered to seek advice, act and speak-up. We encourage you to always seek advice from your line manager. Also bear in mind that you have a duty to report violations of the AGBP. Reporting a concern also gives Arcadis the opportunity to detect early a potential or actual violation of our AGBP.

Please use the following reporting lines:

- Your line manager;
- Your country management;
- Your country compliance officer/committee;
- The management of your global business area
- Your GBA compliance officer/committee;
- The corporate compliance officer/committee; or
- The Arcadis audit & risk committee.

If the person first listed is not available to you, the issue concerns that person, or if you are not comfortable reporting to such person, you should report to the next party referenced in the reporting line. If you feel uncomfortable or would prefer to first speak to someone in confidence about a suspected violation you can always reach out to your Compliance Officer.

You prefer to remain anonymous

If you wish to remain anonymous, you can report concerns or violations through the Integrity Line. The Integrity Line for employees is managed by an independent third party and is available 24 hours/7 days. The Integrity Line for employees is available through the Arcadis Intranet and in local languages.

No retaliation

Arcadis encourages reporting of actual or suspected misconduct, fraud or irregularities and will trust your judgment to report these in good faith. When you raise your concern in good faith, there will be no negative consequences and you will be protected against retaliation. Arcadis will not hold you accountable for any loss of business resulting from compliance with the AGBP and the law.

Consequences of violating the AGBP, for you and the company

Violating the AGBP and/or legislation may result in disciplinary actions, ranging from a warning, suspension, reduction in pay, demoting or termination of the employment. Disciplinary action shall reflect the severity of the issue.

Violating the AGBP and/or legislation may also have other severe consequences for Arcadis, such as reputational damage, issues with (potential) clients and a decrease in Arcadis' share price, in addition to criminal or administrative sanctions. Many companies, and increasingly company employees, have already experienced the consequences of violating legislation first-hand, with significant fines and imprisonment, as a result.

Integrity line for external stakeholders

Arcadis has a reporting procedure available for its external stakeholders (suppliers, clients and other third parties) to report any concerns they may have that the AGBP and/or related policies are being breached. This procedure includes an anonymous Integrity Line managed, and made available in local languages, by an independent third party. This anonymous external Integrity Line is available 24 hours/7 days for the event our stakeholders are uncomfortable raising a concern or reporting suspected misconduct or irregularities related to the cooperation with Arcadis directly with their contact person within Arcadis.

Arcadis will investigate, address and respond to the concerns of our stakeholders and will take appropriate corrective action in response to any violation. Arcadis recognizes that reported concerns may be about a third party or be in confidence and Arcadis assures it will be handled as such, without repercussions or retaliation for reports made in good faith. To report a concern, our stakeholders can also send an e-mail to compliance@arcadis.com.

Further information for employees is available on the Arcadis Intranet

[AGBP Issue Reporting and Handling Procedure](#), [Arcadis Integrity Line for employees \(anonymous\)](#), [Local Whistleblower Policy](#), [Arcadis Integrity Line for external stakeholders](#), [List of local Compliance Officers](#), [Global Employee Assistance Providers \(EAP\)](#).

Chapter 7**Additional information**

List of further information for external stakeholders on www.arcadis.com

Health & Safety Commitment (external link)	https://www.arcadis.com/en/about-us/business-practices/health-and-safety
Arcadis Integrity Line for External Stakeholders (external link)	https://www.arcadis.com/en/about-us/business-practices/general-business-principles
Human Rights and Labor Policy (external link)	https://www.arcadis.com/en/about-us/business-practices/human-rights-and-labor-policy
Global Procurement Policy (external link)	https://www.arcadis.com/en/about-us/business-practices/procurement
Global Supplier Code of Conduct (external link)	https://www.arcadis.com/en/about-us/business-practices/procurement
Lovinklaan Foundation (external link)	https://www.lovinklaan.nl/en/
Non-Financial Reporting webpage (external link)	https://www.arcadis.com/en/about-us/sustainability/our-non-financial-reporting
Specific Anti-Corruption Standards (SACS) (external link)	https://www.arcadis.com/en/about-us/business-practices/general-business-principles
Global Tax Principles (external link)	https://www.arcadis.com/en/about-us/business-practices/tax-principles

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Where the local laws or culture of the countries in which we operate require, additional policies may be implemented locally to supplement the General Business Principles.

The Arcadis General Business Principles are available in multiple languages. If there are discrepancies between the English version and the translated version, the English version will prevail.

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About Arcadis

Arcadis was established in 1888 from a pioneering idea: reclaiming moorland in the Netherlands with the purpose of Improving Quality of Life. Since then, our people have led projects around the world that have pushed forward the boundaries of sustainability and created positive impacts on the environment and society. Arcadians are committed to developing innovative solutions that protect the planet and promote a sustainable world today and for generations to come. It is our ambition to maximize impact in society through the projects we undertake for our clients, in our own business operations, and by empowering our people and engaging communities where we live and work.

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