



Human Rights Policy

14 March 2024



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FOUNDATIONS

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Introduction

This policy sets out the principles for how we relate to our employees, suppliers, contractors and business partners. We will avoid violating the human rights of others and endeavor addressing adverse human rights impacts. We will be particularly attentive to the human rights we are at risk of impacting most and to the people most vulnerable to adverse impacts, including women, children and migrant workers.

article 1 Our Commitment to Human Rights

1. This document sets out the policy of Sif holding N.V. and its subsidiaries (hereinafter together referred to as the 'Company') on internationally recognized human rights including those set out in the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the ILO Declaration on Fundamental Principles and Rights at Work;
2. The Company will conduct its business consistently with the United Nations Guiding Principles on Business and Human Rights (hereinafter referred to as the 'UN Guiding Principles') and the ten principles of the UN Global Compact. These include the human right to freedom of association and collective bargaining and the human rights not to be subject to forced labor, child labor or discrimination in respect of employment and occupation.
3. The Company will continuously seek to improve our human rights efforts.
4. This policy is complementary to, and subject to, applicable laws and regulations.
5. This policy shall be posted on the Company's website.

article 2 What we expect from our employees, contractors, suppliers, and business partners

- We expect our employees, contractors, suppliers and business partners to follow the spirit and intent of this policy and share our commitment to respect all internationally recognized human rights, including those specifically referenced above, when working for or together with us;
- We expect all our employees, contractors, suppliers and business partners to pay particular attention to the human rights they are at risk of impacting most and to the human rights of people most vulnerable to adverse impacts, including women, children and migrant workers;
- We will strive to exercise influence in our business relationships to avoid or mitigate adverse impacts to human rights directly linked to our activities;
- We will continue to systematically implement human rights due diligence into the way we work as appropriate;
- Where applicable laws or requirements prohibit us from upholding this policy, we will seek ways to ensure respect for human rights to the greatest extent possible.

article 3 Implementation of this policy

Training of employees and due diligence on suppliers, subcontractors and business partners are the cornerstones of this Human Rights policy.

- Upon their employment by the Company, new hires will go through an onboarding training where acquaintance with and explanation of this policy is on the agenda. The policy is included in the employee handbook where employees can find the latest version. They will be separately updated on possible revisions to this policy;
- References to this policy will be made in new contracts with suppliers, subcontractors and business partners. The Company expects them to include this policy in their working methods or to use their own policy which should be based on the UN Guiding Principles and on the OECD Guidelines for Multinational Enterprises on



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Responsible Business Conduct. The obligation to include this Human Rights policy or to have an own policy will be subject to due diligence on the supplier, subcontractor or business partner.

article 4 Human Rights Priorities

The Company's operations are concentrated in the Netherlands with employees and tier one suppliers mainly from countries from the European Union. The Company recognizes equal pay, diversity & equal treatment and safe & healthy working conditions as the most salient human rights priorities for its operations. Specifically, the Company will never tolerate or knowingly do business with any individual or company that:

- tolerates forced labor, human trafficking or slavery, physical punishment, child labor, discrimination, unsafe working conditions, unequal treatment, unfair wages, excessive working hours or violations of labor or social security laws or
- does not respect the right to freedom of association for all employees. Employees have the right to join or form trade unions and to bargain collectively and will not be discriminated or retaliated against for doing so.

article 5 Speak-up and act on concerns

Employees, contractors, suppliers and business partners are encouraged to speak up about any concerns that they may have. If you observe behavior that is illegal, or that breaches the principles in this policy, report your concerns using the Company's Whistleblower policy on the Company's website. [*link toevoegen*]

article 6 Amendments

The Executive Board may, with the approval of the Supervisory Board, amend or supplement this policy pursuant to a resolution to that effect. Any amendment made pursuant to this Article 6 shall be subject to applicable laws and regulations.