



WHISTLE BLOWER POLICY

 **Huisman**

Worldwide Lifting, Drilling and Subsea Solutions

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| Policy Owner: | The Board of Huisman Equipment |
| Document prepared by: | Legal Counsel |
| Applicable to: | All persons and entities acting for and on behalf of Huisman |
| Version: | January, 2016 |

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1. Introduction

Huisman Equipment (hereinafter: Huisman) is committed to protect its reputation of doing business with high standards of integrity. We believe that honest behaviour and communication at all levels is crucial to achieve this. Huisman encourages employees to report Suspected Misconduct without fear for sanctions, repercussions or unfair treatment. The Code of Conduct sets out the principles that we must all follow in our daily behaviour and decisions. Employees can use this Whistle Blower Policy to communicate on reportable conduct.

2. Objective and Scope

The objective of this Policy is to ensure that all matters that may cause harm or damage to Huisman's reputation, not only limited to financial or non-financial loss, are reported and dealt with in a timely and adequate manner.

We recognise that violations of laws, regulations and the Code of Conduct are possible in any business and that employees or persons close to the business may often be the first to notice. We encourage anyone with knowledge of Suspected Misconduct to come forward and to raise his or her concerns within Huisman, rather than overlooking a problem or contacting the media or other external parties.

Any employee, who in good faith seeks advice, raises a concern or reports Suspected Misconduct is following the Whistle Blower Policy. This Policy is not intended to deal with employment related disputes or complaints of an individual nature, unless a breach of the Code of Conduct is involved. Such employment related disputes must be dealt with by an employee's line manager and/or HR. If there is any uncertainty, question or concern (e.g. how to apply this Policy in a specific situation), please ask the Local or Group Business Integrity Function for guidance.

3. Reporting procedure

3.1. To whom to report

Huisman encourages any person who, whether anonymously or not, wishes to make a report in connection with Suspected Misconduct (hereinafter: Reporting Person) to do so. Suspected Misconduct means a suspicion, based on reasonable grounds, pertaining to Huisman in connection with a violation of the rules of conduct applicable within Huisman and a(n) (impending) violation of laws, regulations and applicable guidelines.

Any concerns related to Suspected Misconduct should be raised with:

- the line manager of the individual(s) suspected of misconduct;
- alternatively to the Local Business Integrity Function or Local Board of Management; and
- if, for whatever reason, reporting locally is not appropriate, the employee may report the Suspected Misconduct to the Group Business Integrity Function.

If the allegation concerns the Group Business Integrity Function or a member of the Group Board of Management, then the Reporting Person may report directly to the chairman of the Supervisory Board. Furthermore, reporting to the chairman of the Supervisory Board is allowed if the Suspected Misconduct concerns a member of the Board of Management of Huisman.

3.2. How and what to report

If there is a reasonable suspicion that a violation is occurring or about to occur it's every employee's obligation to take immediate action. The Reporting Person can raise its concern verbally, in written form or by email, and should include full details of the Suspected Misconduct:

- what the Suspected Misconduct is (supported with details and facts);
- where the Suspected Misconduct occurred or might occur;
- when the Suspected Misconduct occurred or might occur;
- who the persons involved are;
- if possible, any supporting evidence; and
- any other information the Reporting Person considers to be relevant.

The line manager, Local Board of Management, Local or Group Business Integrity Function or Supervisory Board makes a record of the report, which includes the details provided and the date of receipt. In case of a written report, the Reporting Person is sent an acknowledgement of receipt. In case of a verbal report, a written record is sent to the Reporting Person for confirmation.

4. Investigation

Within a period of four weeks, the Reporting Person is provided an update on the reported Suspected Misconduct, the initiation of the investigation and (possible) next steps or measurements taken. Depending on the nature of the Suspected Misconduct, a suitable person, team and investigation method are identified to investigate the reported Suspected Misconduct.

The persons involved in the Suspected Misconduct are given the opportunity to vindicate themselves and clear their name. Persons involved in the Suspected Misconduct may be subject to disciplinary actions, including termination of employment, depending on the results of the investigation.

5. Safeguarding of the whistle blower

Huisman will make every effort to offer the Reporting Person protection, confidentiality, and upon request, anonymity. During the investigation, Huisman handles all received and retained information confidentially and according to the applicable rules and legislation. Only with the permission of the Group Business Integrity Function, may information be provided to other employees or third parties.

An employee that reports Suspected Misconduct in good faith shall not be penalised in any way. Victimisation of an individual for raising a concern within the terms of this Policy will be treated as an offence of the Code of Conduct.

Huisman expects allegations to be made in good faith and will not tolerate false allegations, for example, to pursue a personal grudge against another employee. Huisman considers false allegations a serious breach of this Whistle Blower Policy and the Code of Conduct. Huisman will take disciplinary actions against the Reporting Person if this occurs. Disciplinary actions may involve disciplinary actions, including termination of employment.