



ABO-Group Environment

Code of conduct

Preface

ABO-Group Environment is a cluster of specialized engineering and consultancy companies focused on soil investigation, geotechnical and geophysical studies, environment and energy. ABO-Group operates in Belgium, the Netherlands and France, as well as internationally through its Consultancy and Testing & Monitoring departments. ABO-Group always guarantees its customers a sustainable solution. Each company within our three home countries operates under the name of ABO, retaining its own expertise, identity, authenticity and values. This flexibility promotes sustainability in policy, which in turn reflects positively on the group's financial strength.

The world in which we live and work continues to become more and more complex. To ensure that everyone can navigate their way through this world, we have established a code of conduct. This code provides text and explanation on how we want to do business. The code deals with the most important issues surrounding the way we work, embodied in a simple framework.

The rules described in this code embody the values that should inspire our company's employees every day and serve as a basis for supporting our corporate culture. Good working relationships and codes of conduct with integrity are the key to success.

We count on every employee to adhere to this code and thus contribute to the success of our company.

The Board of Directors

Contents

1. General provisions	4
Mission	4
Values	4
2. Code of conduct	5
Equal opportunities	5
Transgressive behaviour, violence and harassment	5
Personal information and information security	5
Health and safety	6
Policy on alcohol and other drugs	6
Conflicts of interest	7
Bribery and corruption	7
Gifts and entertainment - reports	8
External communication	8
Insider trading	8
3. Implementation	8



1. General provisions

1.1. Mission

ABO-Group's mission is: "To shape the development of a sustainable living environment by providing (environmental) technical solutions, supported by a team of multidisciplinary experts".

ABO-Group's business model is flexibly applied and follows the various trends in new technologies, customer needs and changing regulations in the various markets and countries in which ABO-Group operates.

The people-oriented or family culture, is the primary culture that fits the DNA of ABO-Group. The relationship between people is central to this culture. The care for customers and employees comes first. A lot of time is spent on supporting customers, employees, participation, openness and well-being. Secondly, a result-oriented culture is in play. We are market-oriented; entrepreneurship, growth, innovation, productivity, return and results are continuously stimulated.

1.2. Values

Our corporate values support our culture: 'Ambition', 'Best Practices' and 'Open Minded', these are our driving forces and are communicated to all our stakeholders..

Ambition

We have the ambition to become the benchmark in each of our markets, fields and niches. We aim to move forward by continuously developing our services and diversifying our activities inside and outside Europe. We invest in the development of our employees by giving them sufficient resources to develop within the organisation and thus realise their ambitions. Employees are encouraged to look for creative solutions to meet our customers' needs. We are willing to engage in lifelong learning.

Best Practices

We strive for quality and sustainable solutions. We keep in mind the care for people, safety and the environment. We handle our resources wisely and focus on our successes. We take an efficient and result-oriented approach with a to-the-point mentality. This way, we deliver the desired quality on time. We comply with laws, decrees and regulations. We honour our commitments and believe in fairness, objectivity and loyalty.

Open Minded

We treat employees and customers with respect and integrity. We strive for constructive cooperation and commitment. Mutual trust is an essential value.

We value transparent, honest and open internal communication so that our employees can transmit this favourable mentality to our customers. We reject any form of discrimination.

2. Code of conduct

2.1. Equal opportunities

At ABO-Group, we value equal opportunities. We encourage diversity in recruitment, promotions, advancement, succession, etc., regardless of gender, skin colour, origin, sexual orientation, age, religion or political persuasion.

Our focus is on attracting/developing talent, working well together and providing the best service to our suppliers and subcontractors, promoting diversity, gender equality, respect and appreciation.

2.2. Transgressive behaviour, violence and harassment

Transgressive behaviour (conflicts, harassment, discrimination, sexual harassment and aggression) is not tolerated in our company. Every employee has the right to do his or her job freely and without psychosocial pressure. Should this nevertheless occur, employees can contact the HR responsible and/or internal confidential advisor in all confidence.

2.3. Personal information and information security

2.3.1. Personal information

ABO-Group is aware that the appropriate processing of personal data is an indispensable aspect of privacy law. ABO-Group's course of action is of course in accordance with the current Personal Data Protection Act and also with the General Data Protection Regulation (GDPR) of 25 May 2018.

ABO-Group is therefore responsible for the following:

- Processing the personal data - in accordance with the purpose for which they were provided. These purposes and types of personal data are described in the Privacy Statement on our website.
- Limit the processing of personal data to only those data which are minimally necessary for the purposes for which they are processed.
- To explicitly ask the person concerned for their permission if ABO-Group uses their personal data.
- To take appropriate technical and organisational measures so that the security of the personal data is guaranteed.
- Not to pass on personal data to other parties, unless this is necessary for the execution of the purposes for which they were provided.
- To remain informed about the rights concerning personal data and to inform staff members to respect these rights.

This privacy statement is structured as follows:

- Purposes of data processing (general)
- Marketing activities
- Personnel
- Provision to third parties
- Storage period
- Security level
- Rights of those involved
- Complaints
- Contact details
- Adjustment to privacy statement

2.3.2. Information Security

ABO-Group gives its employees access to the Internet and provides them with an e-mail address that can be used via PCs, laptops, telephones, tablets and/or mobile phones. With this, ABO-Group wants to enable internal and external communication.

It is important, in the context of GDPR and the ever-increasing use of software, internet and e-mail, as well as telephony and ICT tools, to jointly establish a number of principles in order to:

- Avoid any undesirable deviant behaviour (illegal or inappropriate use)
- Prevent illegal use or possession of software as much as possible
- Ensuring the security of networks and computer systems
- Protecting company information from any unauthorised disclosure
- Promote the optimal and efficient use and consumption of the ICT infrastructure

2.4. Health and safety

ABO-Group puts the well-being of its own staff and that of third parties first in all its activities. The health and safety of our employees is our top priority. We also pay attention to work safety, healthy and pleasant working conditions, respect for the environment, as well as psychological and physical problems.

The Executive Board and the management team take responsibility for the safety and health of all employees. In doing so, they make the necessary resources available to pursue an active and dynamic prevention policy.

ABO-Group translates its prevention policy into the following concrete objectives:

- Prevention of accidents, physical injuries, material and environmental damage.
- Promoting the occupational safety and health of all employees, including third parties.
- Intervening proactively in case of danger or risks in order to create a safety-conscious working environment.
- Analysing accidents so that the necessary preventive measures can be taken to avoid other similar accidents.
- Ensuring that new employees are properly welcomed, and training and supervising own employees and external parties.
- Violence, bullying and sexual harassment at work are considered unacceptable and will be dealt with appropriately.
- Increasing the safety awareness and behaviour among all employees and external parties through awareness-raising, training and instructions.
- All employees must comply with the safety instructions and must wear their personal protective equipment, they must take care of their own safety and that of their colleagues and must report hazards at work..

A continuous improvement of the safety policy is pursued. Concrete objectives are set and evaluated annually. The Executive Board and the management team work very closely on this with the CPBW, the internal prevention service and the prevention advisor.

Safety, health, welfare and the environment are priority points in the evaluation of our employees and external parties.

2.5. Policy on alcohol and other drugs

The alcohol and drug prevention policy developed by ABO-Group applies to all staff employed. It also applies to third parties present at places of employment, if they have been notified in advance.

The main objective is to collectively prevent and remedy dysfunction at work caused by alcohol and other drug use. In other words, an employee with an (eventual) alcohol or drug problem will be addressed when it becomes clear that his or her work performance and/or work relations are starting to suffer. This policy is mainly aimed at raising awareness and empowering employees with regard to the issues and risks associated with the use of alcohol and other drugs at work.

Each member of staff must contribute to this policy to the best of their ability. Each shall specifically ensure that:

- To behave responsibly in order to avoid any dysfunction related to alcohol or other drug use.
- Inform the employer and the prevention adviser immediately of any work situation which he/she may suspect presents a serious risk to safety and health.

When abuse is identified, it is ABO-Group's philosophy to enter into dialogue with the employee, to seek a solution together and to offer opportunities for professional help. The willingness of the employee, the underlying cause and the likelihood of recurrence will be crucial factors.

2.6. Conflicts of interest

Conflicts of interest, or the appearance of conflicts of interest, should be avoided. ABO-Group employees are required to disclose to their manager and to the ABO-Group Compliance Officer any time they become aware that their personal interests, or the personal interests of their close relatives or friends, may conflict with the interests of ABO-Group. A conflict of interest arises when an employee is presented with an opportunity for personal gain that might affect their judgement, objectivity, independence or loyalty to ABO-Group. The same applies when close relatives (spouse or life partner; children and grandchildren; parents and grandparents; brothers and sisters-in-law; sons and daughters-in-law; and any person living with the employee) engage in activities or have interests that conflict with the interests of ABO-Group. When in doubt, employees should seek advice from the Compliance Officer. Some potential conflicts of interest involving ABO-Group employees may be resolved with prior approval and appropriate clearance from the ABO-Group CEO and Compliance Officer.

The following situations are considered conflicts of interest for all ABO-Group employees and are not permissible:

- Working for a client of ABO-Group for whom the employee works as part of his/her employment with ABO-Group.
- Working for a competitor of ABO-Group.
- Working for a company supplying goods or services to ABO-Group.
- Personally providing or participating in any form of professional or advisory services to a client or potential client of ABO-Group.
- Receiving on a personal basis fees for giving training or lectures to clients, associates, associations, federations ... linked to ABO-Group activities.
- Obtaining a personal benefit or obtaining a personal benefit for a close relative by misusing an ABO-Group function or using ABO-Group information..

The recruitment of a close relative of an ABO-Group employee requires the prior written approval of the CEO of ABO-Group.

2.7. Bribery and corruption

ABO-Group does not engage in any form of bribery or corruption in the countries in which it operates. Employees or anyone acting on behalf of ABO-Group must not, directly or indirectly, offer or receive payments, gifts and/or entertainment with the intention of influencing a

decision or outcome. Any ABO-Group employee who receives a request for bribery or perceives a suspicion of bribery must immediately report the matter to their manager, and to the CEO, as well as to the ABO-Group Compliance Officer.

2.8. Gifts and entertainment - reports

Gifts, hospitality or entertainment may not be offered or accepted if they improperly influence, or appear to influence, business decisions. Gifts, hospitality and entertainment must not exceed the bounds of customary business practice. All forms of entertainment which could damage the reputation of ABO-Group should be avoided. Employees are required to disclose and seek prior approval from the CEO and Compliance Officer of ABO-Group, if they accept a proposal worth more than €100. If a proposed gift cannot be refused or returned without causing offence, the gift will be handed over or discussed with the Compliance Officer who will decide whether the gift can be accepted or whether an appropriate way of disposing of it should be found, for example by donating it to a chosen charity.

2.9. External communication

ABO-Group is a listed company and is therefore subject to disclosure obligations. ABO-Group provides consistent, accurate, transparent and clear information to its shareholders and investors, the market and society at large about its business and operations. Communications to shareholders, investors, the media and the public about ABO-Group, its business and financial performance should be made only by authorised individuals. No employee should speak to the media, financial analysts or current and potential investors on behalf of ABO-Group or disclose any information relating to ABO-Group or make any public statements on behalf of ABO-Group unless specifically instructed to do so.

Personal views relating to religion and politics or any objectionable message should not be expressed on ABO-Group stationery or in e-mails or in any other context in which such views or information might appear to be attributable to ABO-Group. When participating in online discussion forums and social media, ABO-Group employees must adhere to the guidelines set out in the ABO-Group Code of Integrity and Social Media Policy.

2.10. Insider trading

Employees should not pursue personal investments or business opportunities based on non-public information relating to ABO-Group or its customers or suppliers. Employees are prohibited from trading in shares, options or other securities issued by ABO-Group while in possession of non-public insider information which, if disclosed, could affect ABO-Group's share price. Information is considered to be non-public if it has not been officially disclosed by ABO-Group in compliance with stock exchange regulations. In the course of its business, ABO-Group sometimes obtains material non-public information relating to customers or third parties. Employees are prohibited from trading in the shares of such customers or third parties while in possession of such confidential information. It is not permitted to pass on such information or give investment advice to third parties or close relatives on the basis of inside information obtained during employment with ABO-Group.

3. Implementation

This Code of Conduct has been approved by the Board of Directors of ABO-Group. The Board of Directors receives reports on violations on the instruction of the Compliance Officer and supervises the implementation of the Code.