Rules of procedure for the complaints procedure pursuant to section 8 of the German Supply Chain Due Diligence Act (LkSG)

7th October 2026

INSPECCIÓN ISO 17020 Nº485 / EI750
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Contact

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ARCADIS RULES OF PROCEDURE

I. Introduction

Arcadis Germany B.V. & Co. KG and its subsidiaries and parent companies are committed to respecting human rights and protecting the environment. It is the declared aim of the company management to respect, protect and promote human rights and environmental standards along the entire supply chain. Violations of internationally recognised human rights and national and international environmental protection regulations are not tolerated. Arcadis Germany B.V. & Co. KG takes appropriate and effective measures to identify and verify human rights related and environmental risks in its own business area and in the entire supply chain and to prevent the realisation of risks. The human rights and environmental due diligence obligations include the establishment of an effective complaints procedure through which whistleblowers can report violations, risks, and other issues.

These rules of procedure explain the process of submitting and processing incoming complaints. It sets out how the complaints procedure can be used, who is responsible for the complaints procedure, what the specific process looks like once a complaint has been received, and what measures are taken to protect whistleblowers. The aim of the complaints procedure is to enable whistleblowers to contact us easily and safely so that human rights related and environmental risks and violations in the supply chain can be identified at an early stage and any violations that have occurred can be minimised and eliminated.

Arcadis operates a digital whistleblower system, Integrity Line, which implements the legal requirements in Germany. Integrity Line is hosted by an independent third party and reports are received directly by Arcadis' Global Compliance Office for initial assessment and where applicable redirected for confidential handling and processing. Integrity Line enables confidential reporting of information – completely anonymously if desired – on the website. This whistleblowing system offers a simple, confidential, data protection-compliant and (if desired) anonymous reporting centre that is available 24/7 and in many languages.

In addition to and independently of the complaints procedure, Arcadis Germany B.V. & Co. KG monitors compliance with due diligence obligations as part of an established risk management system, which is carried out for example by using a supply chain intelligence tool and a questionnaire-based review of our suppliers.

II. Users of the complaints procedure

The complaints procedure is open to the public and is available to all persons, whether national or international. The complaints procedure can be used by both internal and external persons, including our Arcadis employees, employees of direct or indirect suppliers or residents around local activity sites. Both affected and unaffected persons can submit complaints.

III. Scope of application of the complaints procedure

The complaints procedure enables individuals to report human rights related or environmental risks and violations that have arisen as a result of the business activities of Arcadis Germany B.V. & Co. KG and/or its subsidiaries or parent companies or in its supply chain. This applies to activities both in Germany and abroad. Notifications in accordance with the LkSG relate, among other things, to the following protected human and environmental rights: the prohibition of child labour, the prohibition of forced labour, the prohibition of slavery or slavery-like practices, occupational health and safety precautions, the prohibition of violations of the freedom of association, the prohibition of unequal treatment of employees, the prohibition of withholding an appropriate wage/minimum wage, the prohibition of causing harmful changes to soil, water pollution, air pollution, harmful noise pollution, or excessive water consumption, the prohibition of unlawful eviction and the unlawful deprivation of land, forests and water, the prohibition of the unlawful and inappropriate use of private or public security forces to protect a business project.

Date: 7th October 2026

IV. Procedure

If Integrity Line is used to submit a complaint, the procedure upon receipt of the complaint is standardised.

1. Responsibility for the complaints procedure

Complaints are only received and processed by employees who act impartially, are obliged to maintain confidentiality and are not subject to any instructions within the framework of the complaints procedure.

2. Reporting channels for the submission of a complaint

In principle, there are different reporting channels available to whistleblowers:

a) An internet-based reporting channel for verbal or written complaints, which can be accessed in several languages via the following link:
Arcadis Global | Home

b) Postal information can be sent to the following address:

Compliance Department
Arcadis Germany B.V. & Co. KG
EUREF-Campus 10
10829 Berlin, Germany
E-mail: compliancegermany@arcadis.com

Reports can be submitted confidentially or anonymously. The processing status of a report submitted via Integritiy Line can be tracked on the internet-based digital reporting channel.

3. Receipt of a complaint

Upon receipt of a complaint, the person making the complaint will receive a confirmation of receipt. The confirmation of receipt is usually sent immediately, although it may be delayed by up to one week. Initially, the report undergoes global processing, followed by distribution to the respective national case handlers.

For anonymous reports, a Secure Inbox can be set up for communication. To do this, once you have submitted your report, you will be assigned a Case ID as part of the confirmation process and you can choose your own password. Using the Case ID and your password, you can access your inbox and check whether you have received any questions or further correspondence.

If you have deliberately chosen not to submit your report anonymously and have provided your contact details, you will also be notified via the email address you provided that your report has been received. Regardless of whether you choose to remain anonymous or provide your name, we recommend creating a secure mailbox to make communication easier and more secure.

4. Processing of the complaint

After receipt of the report, the information is reviewed centrally on a global level and then assigned to a person in charge of processing the report. Reports relating to an affiliated company of Arcadis Germany B.V. & Co. KG are forwarded to the responsible person at the relevant affiliated company. The responsible case worker maintains contact with the whistleblower, if necessary anonymously, via the Integrity Line, investigates the facts of the case and discusses them with the whistleblower if necessary. Reports are taken into account as part of a risk analysis. If a violation of human rights or environmental obligations is identified, the responsible case worker will immediately initiate corrective measures. If necessary, Arcadis may offer the option of amicable dispute resolution. In case of a complaint regarding a human rights or environmental risk, without a violation having occurred, the responsible case worker will initiate preventive measures. The results of the investigation are communicated to the whistleblower and, if necessary, further steps are discussed with them. The processing of complaints is usually finalised within three months of receipt. Arcadis endeavours to process complaints as quickly as possible, before this deadline, and to prioritise urgent complaints.

5. Anonymous submission of a complaint

In principle, complaints can be submitted anonymously. If a complaint is submitted anonymously, no data is collected that would allow conclusions to be drawn about the identity of the person submitting the complaint. If the person submitting a complaint anonymously provides information that allows conclusions to be drawn about their identity, the information will be treated confidentially.

6. Confidentiality of a complaint

When a report is submitted, the confidentiality of personal data and other information that allows conclusions to be drawn about the identity of the whistleblower is assured. Only the relevant case worker and the person responsible for allocating the report can view a report.

7. Documentation of complaints

Information is stored for seven years in accordance with section 10(1) sentence 2 LkSG and then destroyed.

8. Step by step: Submitting a complaint via the digital whistleblowing system

You can submit a complaint via Integrity Line through the following steps:

a) Open the Integrity Line webpage: Arcadis Global | Home.
b) To report human rights or environmental risks or violations, click the “Make a report” button. You must then first select the location of the incident (country).
c) A pop-up window with information about emergencies can be confirmed by clicking “Yes.” In such emergencies, dial the country’s emergency numbers (For Germany - Police: 110; ambulance/fire department: 112).
d) The report can be submitted in writing via the form or verbally via the voice recording feature. Files can be attached. Fields marked with an * are required.

e) Contact information can be provided in the form or skipped by checking the “Remain anonymous” option. For anonymous reports, the email field can be filled out optionally to receive notifications or it can be left blank.
f) To set up the Secure Inbox, you must enter a password of your choice at the end of the form. You can then proceed by clicking “Next.”
g) A summary of the report will appear. If you need to make any changes, click “Back” to return to the previous page. Otherwise, click “Next” to submit the report.
h) The submission of the report is confirmed, along with the corresponding Case ID.
i) To access the Secure Inbox, please keep the Case ID and the password you chose in a safe place.

9. Protective measures for whistleblowers

Arcadis Germany B.V. & Co. KG respects the protection of whistleblowers against discrimination or punishment on the basis of reports and has taken the following measures to implement this protection:

- Complaints are handled by a small group of selected employees.
- Compliance officers receive regular training.
- Compliance officers sign confidentiality agreements.
- All information about the identity of the reporting person will be treated confidentially during and after the processing.
- Compliance officers are independent and not bound by instructions.

V. Entry into force / Publication

These Rules of Procedure enter into force on 01.11.2026. They will be published on the Arcadis website.

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About Arcadis

Arcadis is the leading global planning and consulting firm for the natural and man-made environment. By pooling local knowledge worldwide and combining our expertise with the latest digital achievements, we achieve outstanding and sustainable results for our clients and their customers. We are 36,000 people operating in more than 70 countries, generating revenues of €4.2 billion (based on pro forma figures for the full year 2021). We support UN Habitat with knowledge and expertise to improve the quality of life in fast-growing cities around the world.

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