



Sponsoring and Donation Procedure

DAMEN

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Why

The purpose of this Sponsoring and Donation Procedure is to ensure a consistent and proper application, registration, review, and approval process for requests for sponsorship and charitable donations to Damen. This will ensure proper execution according to the Damen Code of Conduct. It will, moreover, help to strengthen the Damen brand.

Please also familiarise yourself with both the [Personal and Business Integrity policy](#) and the [Anti-Bribery and Corruption policy](#).

Damen encourages employees and relevant third parties to raise concerns if potential irregularities or integrity-related risks are identified in connection with sponsorships or donations. Such concerns can be reported via the appropriate channels as set out in [POL25 Whistleblower Policy](#), without fear of retribution.

It is important that you know the rules, especially regarding conflicts of interests, and that you act accordingly.

Who

The guidelines in this procedure apply to all Damen companies and employees.

How

This procedure will be evaluated annually and, if deemed necessary, will be updated. SSC Marketing is the owner of this procedure and will monitor its compliance in close cooperation with Group Compliance.

What

Damen aims to become a global market leader in niche markets of shipbuilding, ship repair and conversion, and the supply of marine components and related services. We grow step-by-step, developing our quality as we go. Damen wants to exceed its customers' expectations in terms of quality, innovation, and reliability. Damen attracts top-class customers, employees, suppliers and other business partners in order to be successful in a safe environment.

Damen wants to be a good neighbor, and to be a socially responsible company that gives something back to the society in which we live and work.

Although a world player, Damen remains true to its roots and to its values as a family-owned company. We attach value to maintaining and building enduring local, national and international relationships with our clients, employees and business partners.

Damen encourages and supports sponsorship activities and charitable donations, as long as they do not result in Damen obtaining any improper advantage. Damen does not provide political contributions.

The following criteria apply to sponsoring and donations:

- The goal is of interest to Damen and fits the defined area of interest as listed in the Sponsor and Donation Procedure;
- The sponsorship or donation is in accordance with the [Personal and Business Integrity policy](#) and [Anti-Bribery and Corruption policy](#);
- The sponsorship or donation does not, directly or indirectly, finance religious institutions, pressure groups, political campaigns, parties or candidates;
- Approval levels, as follow in table 1 of this procedure, and additional requirements by SSC Marketing - Communications may be applicable;
- Further reference is made to Table 1 under the approval section of this procedure.

Projects

Damen sponsors projects that are in some way connected to our work and that strengthen brand awareness.

Sponsoring

Our sponsoring activities focus on the following areas of interest in line with our values:

Maritime

As Damen we design, build, service, repair and convert ships, and we deliver components. Therefore, we support a variety of maritime initiatives.

Local

Local support is very important to Damen, many employees and suppliers live/operate close to our operations. We also value a good company reputation. Annually, Damen sponsors local summer and winter festivals.

Cultural

Dutch cultural heritage is important to Damen. We strive to be a partner instead of a sponsor. Our support of dance, theatre, music and museums and other arts reaches a broad and large audience. Damen supports the world leading dance company, Nederlands Dans Theater (NDT) as founding partner. Several times a year, Damen holds NDT events, to which we invite interested customers.

Social

Damen supports many social activities focusing on diverse groups, as we are highly involved in the society we live in.



Sports

As Damen highly values team spirit and health, sports is the bonding element. Damen supports local sports initiatives as we want our employees to be able to enjoy an active and healthy lifestyle.

Employer branding

Damen wants to expand its reputation as a dedicated employer, in order to attract talented professionals and students to work with us.

Responsible party

These projects fall into three categories of responsibility within the Damen organisation (the 'responsible party'), depending on the requestor of such sponsoring:

1.

Corporate sponsoring activities focus on building brand awareness, typically within, but not limited to, the area directly around the Damen Corporate Office (Gorinchem) in the Netherlands. Corporate Sponsoring will be the responsibility of SSC Marketing;

2.

Our commercial sponsoring activities aim to build long-term relationships with our customers and region-specific stakeholders (e.g. embassies, schools, foundations and other institutions) and contribute to local communities where Damen conducts or is seeking to obtain business.

Commercial sponsoring will be the responsibility of the commercial entity (i.e. a local yard) or department (i.e. a Sales Area Director or Commercial Director) that has an interest in the sponsoring requested within each company or division;

3.

Sponsorship of personal interest activities is at the discretion of the Damen family or Executive Board members.

Procedure

The sponsor and donation process is incorporated in the Damen Management System. Corporate sponsor and donation requests that need to be assessed by SSC Marketing must be submitted via sponsoring@damen.com, no matter how small the amount. SSC Marketing will verify whether the request meets our goals, is compliant with the Code of Conduct (including if the request is related to a public official) and perform a check on double requests. Requests for commercial sponsoring and Damen family or EB sponsoring shall be sent to sponsoring@damen.com, where they will be assessed following the same procedure by the competent Sales Area Director/Commercial Director, family or EB member, respectively. A response by SSC Marketing on corporate sponsor requests will follow within four weeks of submission. Local sponsoring and donations requests regarding Gorinchem and direct surroundings will be assessed by a sponsoring committee. Proper administration and record-keeping will be through the sponsoring@damen.com mailbox.

Sponsor and donation requests < € 5,000

- Approval in accordance with the Approval Matrix, including approval by the Manager of the responsible party being either:
 - SSC Marketing for (1) corporate sponsoring
 - Sales Area Director/Commercial Director for (2) commercial sponsoring
 - Family or EB member for (3) discretionary sponsoring.
- A background check of the beneficiary performed by the responsible party, including publicly available information (e.g. Chamber of Commerce, website, media exposure)
- Documented registration via sponsoring@damen.com (or through the appropriate workflow when such is made available)
- Contractual documentation is not mandatory, unless required based on:
 - The nature of the sponsorship or donation;
 - Applicable local legal requirements; or
 - Identified integrity or compliance risk.

Sponsor and donation requests ≥ € 5,000 - < € 10,000

Requirements as per Sponsor and Donations requests < € 5000,- plus:

- Approval in accordance with the Approval Matrix, including final approval by the Group Compliance Officer

Sponsor and donation requests ≥ € 10,000

Requirements as per Sponsor and Donations requests requests ≥ € 5,000 < € 10,000, plus:

- Approval in accordance with the Approval Matrix, including final approval by the Group Compliance Officer and a member of the Executive Board (EB)
- A positive due diligence assessment of the beneficiary, performed in consultation with Group Finance
- A formal written sponsorship or donation contract. The contract shall be signed by and between the sponsorship or donation beneficiary and SSC Marketing or the responsible Sales Area Director/Commercial Director.

Sponsor and donation requests from a government official, regardless of the requested amount

Requirements as per sponsor and donations requests ≥ € 10,000 plus:

- Contractual transparency ensuring clarity on the parties involved, purpose, value and conditions of the sponsorship or donation.
- Where a full sponsorship or donation contract is disproportionate to the value or nature of a request involving a government official, the Group Compliance Officer may, on a case-by-case and risk-based basis, determine that alternative written documentation satisfies the contract requirement of this procedure. Such documentation may include:
 - A detailed and accepted purchase order or invoice
 - An official invitation or confirmation letter; or
 - Another formally accepted document providing equivalent transparency and traceability.
- For higher risk or higher value cases involving government officials, a formal written contract remains mandatory and shall be signed by and between the sponsorship or donation beneficiary and SSC Marketing or the responsible Sales Area Director / Commercial Director.

Approval Matrix:

All sponsorship and donation requests shall be approved in accordance with the Sponsoring and Donations Approval Matrix.

Sponsoring and donations	SSC Marketing or Sales Area / Commercial Director	Approval GCO	Approval EB (or delegate)
Sponsoring and/or donations € <5,000	Yes	No	No
Sponsoring and/or donations € ≥5,000 - € <10,000	Yes	Yes	No
Sponsoring and/or donations € ≥10,000,	Yes	Yes	Yes
A request of sponsoring and/or donations initiated by or related to a government official, a government related company, or an ongoing tender, regardless of the amount	Yes	Yes	Yes

Don'ts

- › Make payments under the pretext of a donation to charity when the payments in fact serve a political goal, or are meant to bribe someone or otherwise influence a business decision
- › Make or promise any sponsorship or donation in cash or equivalents
- › Use Damen's money or means to finance religious institutions, pressure groups, political campaigns, parties or candidates
- › Make or promise any sponsorship before approval according to procedure
- › Make sponsoring or donation to suspicious bank accounts that do not correspond to the intended recipient
- › Deliberately divide or structure sponsorships or donations to bypass approval thresholds or controls.

Activation

- › Send your sponsor request to sponsoring@damen.com (or through the appropriate workflow when such is made available)
- › Approval procedure: After the approval has been obtained, the contribution will be transferred by the relevant budget holder
- › All sponsor contracts will be signed in accordance with the procedure. In case the sponsor request is for a specific sales area, product group or Damen company, costs will be attributed to the applicable budget and recorded under either SAP GL 61101020 ("Sponsoring") or OneStream GL Account PL480200 ("Sponsoring Costs"), as applicable.
- › Coordination of all activities resulting from sponsor and donation contract will be carried out by the responsible department in close cooperation with SSC Marketing or Sales Area/Commercial Director and Group HR (labour market-related sponsoring)



Evaluation

During or after a sponsorship or donation, SSC Marketing or the relevant Sales Area/Commercial Director will monitor the results for Damen, including the reach, attendees, perceived benefit and opportunities for improvement.





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