



Circularity B.V.

Industriedwarsweg 7
4878 AD Etten-Leur
Netherlands

KVK: 78247799

VAT: NL861317415

IBAN: NL49 ABNA 0822 7327 26

SUPPLIER WORKPLACE CODE OF CONDUCT

The Circularity Supplier Workplace Code of Conduct defines standards for fair, safe and healthy working conditions and environmental responsibility throughout the supply chain. The CoC describes the minimum standards of business conduct which we see as fundamental in our dealings with suppliers. We developed these standards and guidelines to make our expectations clear to the entire supply chain and we expect all business partners to fully comply with the standards.

Circularity is committed to comply with all applicable law, conventions and regulations and have based the Code of Conduct on the following:

- International Labour Organisation (ILO) standards
- The United Nations Universal Declaration of Human Rights
- The United Nations Guiding Principles on Business and Human Rights
- The United Nations Global Compact
- The United Nations Convention on the Rights of Children

Law and Code of Conduct Compliance

Circularity requires suppliers to comply with the CoC standards, establish reasonable timelines for compliance, and implement necessary improvements. We expect our suppliers to adhere to all relevant and applicable laws and regulations of the country in which workers are employed. All suppliers and business partners shall follow the national and international laws and regulations that apply to the business that is conducted. When any law conflict with the CoC, suppliers are expected to comply with the highest standard that is the most in favour of all employees.

Whenever it is clear that a supplier does not act in accordance with the requirements set out in the CoC, Circularity may consider ending the business relationship with the supplier, if the supplier does not take the necessary corrective action to ensure compliance with the CoC.

Labour

Child Labour



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All children have all the rights stated in The UN's Convention on the Rights of the Child, no matter who they are, where they live, what language they speak, what their religion is, what they think, what they look like, if they are a boy or girl, if they have a disability, if they are rich or poor, and no matter who their parents or families are or what their parents or families believe or do. No child should be treated unfairly for any reason.

Suppliers shall employ no person under the age of 15 or the age for completion of compulsory education, whichever is higher. Children aged 15 - 18 shall not perform work which, by its nature or the circumstances in which it is carried out, is likely to compromise their health, safety, morals, or education. There shall be no forms of slavery, such as the sale and trafficking of children, debt bondage and serfdom, and compulsory labour. Young workers shall be allowed to participate in education and training programmes.

Forced Labour

There shall be no use of forced, bonded or involuntary prison labour, slavery, or trafficking of people in any form. All workers are entitled to a written contract of employment in a language they understand. Suppliers are required to monitor any third-party entity which assists them in recruiting or hiring employees, to ensure that people seeking employment at the facility are not compelled to work through force, deception, intimidation, coercion or as a punishment for holding or expressing political views.

Harassment, Abuse, and Disciplinary Practices

Suppliers shall treat their employees with respect and dignity. No employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse. Suppliers shall have a written policy or plan to address violations and provide a grievance procedure for employees to report harassment, corporal punishment, and physical or mental abuse.

Discrimination, Violence and Harassment

No person shall be subject to any discrimination in any aspect of the employment, relationship including recruitment, hiring, compensation, benefits, work assignments, access to training, advancement, discipline, termination or retirement based on race, religious belief, colour, gender, pregnancy, childbirth or related medical conditions, age, nationality, social background, sexual orientation, marital status, political opinion, union affiliation or any other classification that could give rise to discrimination. Employees shall not be subject to any form of violence, harassment, and inhumane or degrading treatment in the workplace, as well as threats of violence and abuse, including corporal punishment, verbal,



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physical, sexual, economic or psychological abuse, mental or physical coercion, or other forms of harassment or intimidation.

Grievances

Grievance and disciplinary processes are transparent and fair. Suppliers must have a grievance policy and procedure in place. The reporting process must be transparent and accessible to all employees. There must be no risk of retaliation to any employees who put forward a complaint. All disciplinary procedures must be established in writing and explained verbally to employees in a clear and understandable terms and all measures should be recorded.

Freedom of Association and collective bargaining

Workers must be free to join organizations of their choice and have the right to freedom of association and collective bargaining. Suppliers must develop and fully implement effective grievance mechanisms which resolve internal industrial disputes, and employee complaints, and ensure effective, respectful and transparent communication between employees, their representatives and management.

Wages and Benefits

Employers shall pay wages which equal or exceed minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law and/or contract. Employers shall provide all legally mandated holidays, leave, benefits and bonuses to all eligible workers within defined periods. All employees should be made aware of their payment conditions before they commence their employment and receive a copy of their labour contract.

Working Hours

Hours of work shall comply with laws and industry standards. The regular work week shall not exceed 48 hours or the maximum allowed by the law of the country of manufacture, whichever is less. Employers shall allow workers at least 24 consecutive hours of rest every seven days. All overtime shall be consensual. Employers shall not request overtime hours regularly and overtime shall be compensated at a premium rate. The sum of regular and



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overtime hours in a week shall not exceed 60 hours or the maximum allowed by the law of the country of manufacture, whichever is less.

All employees shall be entitled to contractual holidays, sick leave and parental leave with no negative repercussions. Pregnancy may not under any circumstances be considered grounds for termination.

Health and Safety

Workplace Health and Safety

Suppliers shall provide a safe and healthy workplace to prevent accidents and injury to health out of, linked with, or occurring in the course of work or as a result of the operation of employers' facilities. The employer shall take a proactive approach to health and safety by implementing policies, systems and training designed to prevent accidents, and injuries and protect worker health. First aid kits shall be available in sufficient numbers throughout the factory, maintained and stocked as prescribed and easily accessible to workers. A sufficient number of workers shall be trained in first aid. Occupational health checks and safety drills should be conducted regularly and records should be kept in good order.

Building Fire and Safety

There shall be an automatic fire alarm system. Fire drills and testing of emergency systems shall be conducted regularly. All safety equipment shall be available in sufficient numbers throughout the factory, maintained and stocked as prescribed and easily accessible to workers. A sufficient number of workers shall be trained in firefighting techniques. Buildings shall be provided with a clear and unobstructed way of exit for all occupants to safely evacuate, which includes, clearly marked, unlocked and unblocked exits and safe and unobstructed exit pathways leading out of the premises. Evacuation plans shall be in place and shall be posted at the entrance to each exit stair. The building must be maintained in good working order.

Sanitation in Dorms/accommodation

If lodging is provided, all dormitories shall be kept secure, and clean and have safety provisions (such as fire extinguishers, first aid kits, unobstructed emergency exits, etc.). Emergency evacuation drills shall also be conducted regularly. Cooking should take place in a dedicated kitchen area.

Environment

Environment and Safety Compliance



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Suppliers shall maintain written environmental policies and standards and must comply with all applicable environmental laws. Suppliers shall have an environmental management system in place and integrate environmental impact into business decisions. They should take a proactive approach towards improving environmental performance. Procedures and standards for waste management, handling and disposal of chemicals and other dangerous materials, emissions and effluent treatment must comply with environmental laws.

Resource Use, Emissions and Pollution

Suppliers must take measures to continuously improve energy efficiency and make reasonable efforts to use renewable or less carbon-intensive energy sources. Suppliers shall continuously monitor energy and natural resource usage, emissions, discharges, carbon footprint and disposal of wastes. Suppliers must take a proactive approach to minimize negative impacts on the environment.

Waste Water

Suppliers with wet processes must take measures to continuously improve water efficiency and facilitate reuse and recycling where possible. Suppliers must treat wastewater properly before discharge, test the wastewater as required to meet all national and local water discharge compliance standards and share wastewater quality data with stakeholders.

Animals

Animal Welfare

Suppliers must respect animal welfare and work progressively towards adopting healthy and humane practices towards animals based on the best available technology and standards.

Subcontracting

Circularity does not permit subcontracting without our prior written approval. Direct suppliers are required to continuously monitor approved subcontractors and sub-suppliers for social and environmental responsibility using standards that meet and exceed our CoC.

Transparency and Monitoring

We expect all our suppliers and business partners to fully comply with this CoC and expect our suppliers and business partners to be transparent in all their business procedures. Relevant documentation must be maintained for auditing purposes.

Fair Business Ethics:



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No bribery or corruption
Transparency and honesty
Social and environmental consciousness
Responsible sourcing

CoC Communication

Suppliers are required to post the Circularity CoC standards in a conspicuous place frequented by all employees in the local language spoken by the employees, supervisors and managers. Suppliers are required to undertake annual, documented training efforts to educate current and new employees about the CoC standards.



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Acknowledgement

We, the undersigned hereby confirm

- That we have received a copy of the Circularity Code of Conduct understand and agree to its standards.
- That we are aware of all relevant laws and regulations of the country in which our company operates.
- We accept that we have to comply with the provisions incorporated herein and relevant laws and regulations.
- That we will inform all our sub-contractors of the contents and requirements of the Circularity Code of Conduct, and that we will ensure that they also comply with the provisions incorporated herein.

.....
Supplier / Business Name:

.....
Name of Representative:

.....
Title of Representative

.....
Signature:

.....
Date:



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*The CoC must be signed by a duly authorised representative of the company and returned to Circularity.



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