

Circular Covers – Code of Conduct



Introduction

Our Code of Conduct outlines the fundamental principles that guide our actions, work, and services. It ensures ethical behavior, sustainability, legal compliance, and respect for human and labor rights. This Code applies to all individuals within Circular Covers and all subcontractors, regardless of their role or location. Adherence to these principles is a condition of employment or engagement for everyone involved. Circular Covers operates in compliance with applicable national laws and international standards, including relevant ILO Conventions, OECD Guidelines, and environmental regulations.¹

1. Health, Safety, and Environment

Our motto — *“We work together and we work safe”* — reflects our unwavering commitment to the health, safety, and well-being of every individual in our organization, including subcontractors. We strive to foster a secure and supportive working environment that protects both physical and mental health. With a strong sense of responsibility, we conduct our activities safely, collaboratively, and with environmental awareness.

2. Integrity and Anti-Corruption

Circular Covers strictly prohibits any form of corruption or unethical advantage. Employees and subcontractors must not offer, request, or accept any form of bribe, gift, or benefit that could influence business decisions. In cases of uncertainty, employees are required to consult the Managing Director for guidance.

3. Conflict of Interest

Circular Covers treats employees, subcontractors, clients, and suppliers fairly, maintaining relationships built on honesty and integrity. Any situation that creates, or appears to create, a conflict of interest with the company’s interests must be disclosed and avoided. All public statements, communications, or representations concerning Circular Covers must be authorized by the Managing Director to safeguard the company’s reputation.

4. Employment and Labor Rights

Circular Covers upholds human and labor rights for all employees and subcontractors. Employment contracts must be clear and lawful. Child labor and forced labor are strictly prohibited. Employees are to be treated with respect and supported in their well-being. The workplace must remain free from discrimination and harassment, and every individual retains the freedom to associate and participate in worker organizations. Employees may report any employment-related concerns directly to the Managing Director, who will handle all cases confidentially and without retaliation. Circular Covers promotes an open and supportive “speak up” culture, encouraging everyone to raise ethical or safety concerns without fear of negative consequences. All reports and questions are treated seriously, respectfully, and confidentially.

5. Material Responsibility and Recycling

Circularity is at the heart of Circular Covers’ business philosophy. The company prioritizes responsible material selection, minimizes waste, and promotes reuse and recycling throughout its processes. Materials are carefully chosen to align with Circular Covers’ values and environmental standards, ensuring that they are ethically sourced, low-impact, and suitable for reuse and recycling. The foundation of Circular Covers’ approach lies in the principles of Rethink, Reuse, Repair, and Recycle. Embracing reuse and design for longevity is integral to the company’s culture. Continuous innovation aims to extend product lifecycles, reduce landfill waste, and conserve resources through durable and adaptable design.



6. Product Quality and Innovation

Circular Covers is dedicated to producing high-quality, innovative, and reusable products. Continuous improvement is encouraged, and all employees and subcontractors are invited to share ideas that enhance products and processes. Through collaboration and innovation, Circular Covers strives to consistently exceed industry standards.

7. Responsible Use of Facilities and Equipment

All users of Circular Covers' facilities and equipment must act as responsible custodians. Company property must be used safely, respectfully, and in accordance with internal regulations. Facilities and equipment are to be treated with care, as if they were one's own, ensuring preservation and responsible use at all times.

8. Oversight of Subcontractors

Circular Covers collaborates only with subcontractors who share its commitment to ethical practices, environmental sustainability, and respect for human rights. Subcontractors are expected to comply with this Code of Conduct. Circular Covers strives to ensure that all subcontractors work towards upholding these same standards in their operations, recognizing that influence and collaboration are key to achieving shared ethical and sustainable goals.

9. Intellectual Property

The protection of intellectual property is a cornerstone of Circular Covers' principles. The company is committed to securing all intellectual assets created within the organization, including innovations, designs, creations, trade secrets, patents, trademarks, and copyrights. Circular Covers protects its own intellectual property and equally respects that of others, including clients and suppliers.

10. Confidentiality

Confidentiality is central to Circular Covers' operations and essential to maintaining trust. All employees and subcontractors are responsible for safeguarding sensitive information, including proprietary data, client records, trade secrets, and personal information. Access is granted only on a need-to-know basis, and all non-disclosure agreements must be fully respected. Any breach of confidentiality must be reported immediately. By protecting information, Circular Covers preserves integrity, credibility, and the confidence of clients, partners, and stakeholders.

11. Review and Compliance

This Code of Conduct reflects Circular Covers' ongoing commitment to ethical conduct, human rights, environmental responsibility, and transparency. The Code will be reviewed annually to ensure continued relevance and alignment with evolving laws, standards, and best practices.

By adhering to this Code of Conduct, every individual connected to Circular Covers contributes to a culture of integrity, safety, sustainability, and respect ensuring that together, we build a truly circular and responsible future.

Den Helder, 28 October 2025
Circular Covers B.V.

Michiel Kraak
Managing Director

¹ The ILO Conventions, OECD Guidelines, and environmental regulations refer to internationally recognized standards concerning labor rights, ethical business conduct, and environmental protection.