



# CODE OF CONDUCT

CIRCULAR COVER MANUFACTURING (CCM)

Our Code of Conduct outlines fundamental principles that guide our actions, work, and services, ensuring ethical practices, sustainability, legal compliance, and a respect for human and labor rights. This Code applies to all individuals within the CCM organization and subcontractors, regardless of their role or location.

Adherence to these policies and requirements is a condition of employment or engagement for all employees and subcontractors at CCM.

## 1. Health, Safety, and Environment

"We work together and we work safe" is our motto, symbolizing our unwavering commitment to health, safety, and well-being of every individual within our organization, including subcontractors. Our paramount focus is on fostering a secure and supportive working environment that prioritizes both physical and mental well-being.

With a keen sense of responsibility, we execute our activities. This comprehensive approach reflects our dedication to create a workspace that embraces collaboration, safety, and environmental mindfulness.

## 2. Integrity and Anti-Corruption

We strictly prohibit engaging in any form of corrupt behavior. Employees and subcontractors must not offer, request, or accept any benefits. In cases of uncertainty, consult with the managing director for guidance.

## 3. Conflict of Interest

We treat employees, subcontractors, clients, and suppliers fairly, maintaining business relationships based on honesty and integrity. Any situation that conflicts or appears to conflict with CCM's interests should be reviewed and avoided. All our public expressions are under the control of the managing director to protect the reputation of CCM.

## 4. Employment and Labor Rights

We value and uphold human and labor rights at CCM and at our subcontractors:

- Clear contracts adhere to applicable laws.
- No child labor or involuntary work.
- Employee well-being and respect are paramount.
- We foster a discrimination-free, inclusive work environment.
- The right to join worker associations is respected.

For employment-related grievances, employees can approach the managing director directly.

## 5. Material Responsibility and Recycling

The circular economy is at the heart of our business philosophy. We prioritize responsible material selection, minimize waste, and promote recycling and reuse across all our processes. Our commitment to material responsibility begins with carefully choosing materials aligned with our values and environmental standards. We prioritize materials with a lower environmental impact, ethically sourced, and suitable for reuse or recycling.

Embracing the concept of reuse is integral to our company culture. We believe products offer opportunities for continuous innovation beyond their initial use. Our teams constantly seek ways to design products that are durable, reliable, and adaptable for reuse. This not only extends product lifecycles but also reduces landfill waste and conserves resources.

## 6. Product Quality and Innovation

CCM is dedicated to producing high-quality, innovative circular covers. We value continuous improvement and encourage employees and subcontractors to contribute ideas and suggestions to enhance our products and processes. By fostering collaboration and innovation, we ensure our products consistently surpass industry standards.

### **7. Responsible Use of CCM Facilities and Equipment**

All users of CCM facilities and equipment are expected to act as responsible custodians. These resources should be used in compliance with regulations, with a focus on safety, preservation, and orderly use. Treat CCM's facilities and equipment as if they were your own.

### **8. Oversight of Subcontractors**

CCM often collaborates with subcontractors who share our commitment to ethical practices, environmental sustainability, and respect for labor rights. We expect our subcontractors to adhere to the same standards outlined in this Code of Conduct. It is the responsibility of CCM to ensure that subcontractors uphold these principles.

### **9. Intellectual property**

The protection of intellectual property stands as a fundamental pillar of CCM's ethos. We are steadfast in our commitment to securing and upholding the intellectual property generated within our organization. This encompasses innovations, creations, designs, trade secrets, patents, trademarks, copyrights, and any other forms of intellectual assets that originate from our endeavors. The intellectual property of CCM shall be protected, and we respect the Intellectual Property of others such as our clients and suppliers.

### **10. Confidentiality**

Confidentiality is central to CCM's Code of Conduct, reflecting our unwavering commitment to handling sensitive information responsibly. This includes safeguarding proprietary data, client records, trade secrets, and personal details. All members, including employees and subcontractors, are held accountable for adhering to this principle. We limit access and respect non-disclosure agreements. Preventing unauthorized disclosure and promptly reporting breaches are paramount. By valuing intellectual property protection, we nurture trust and responsibility, preserving our integrity and inspiring confidence from clients, partners, and stakeholders.

This Code of Conduct reflects CCM's commitment to ethical conduct, respect for human rights, environmental responsibility, and maintaining a positive reputation. All individuals associated with CCM are expected to adhere to these principles in their actions and decisions.

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Michiel Kraak  
Managing Director CCM