



XYCLE

**Supplier Code
of Conduct**

March 2026



Introduction from the CEO

At Xycle, we believe in collaboration to give plastics a sustainable future. Our mission – ***Together we give plastics a sustainable future*** – calls for partners who, like us, take responsibility for safety, integrity and sustainability.

Our commitment to shaping a sustainable future for plastics is only possible through strong partnerships built on shared values. This Supplier Code of Conduct is vital because it sets the foundation for trust, responsibility, and transparency between Xycle and all our suppliers. By adhering to these principles, we ensure safety, integrity, and sustainability are at the core of every collaboration.

We recognize that urgent global challenges, such as climate change, environmental pollution, and human rights abuses, are shared responsibilities. At Xycle, we actively engage with our partners to reduce negative environmental and social impacts throughout our value chains, believing that every supplier has a pivotal role to play in creating meaningful change.

Our Supplier Code of Conduct outlines clear expectations for stewardship, social responsibility, and ethical governance. Compliance with these principles is a fundamental condition for collaboration with Xycle. By working together, we can drive positive change, uphold the highest standards, and achieve our shared mission for a more sustainable, equitable, and prosperous future.

Thank you for being an integral part of Xycle's commitment to responsible procurement and sustainability. Your partnership is essential to our progress, and together, I am confident that we can reach new milestones in building a better world.

Arnd Thomas
CEO
Xycle Holding B.V.

A handwritten signature in black ink, appearing to read "Arnd Thomas".



1. Xycle's values

Our core values – **Collaboration, Safety, Innovation, Reliability and Perseverance** – guide our decisions, our way of working and our expectations toward supply chain partners.



Safety

We ensure a safe working environment where people are protected both physically and emotionally. We identify risks, report them, and minimize them.



Collaboration & team spirit

We work effectively with others, based on mutual trust, open communication, and the pursuit of shared goals. We support each other, celebrate successes together, and learn from our mistakes.



Innovation & continuous improvement

We strive and drive innovation and optimization by continuously improving our processes, products and services. We are flexible and respond quickly to changes.



Reliability

We are consistent in our words and actions. We deliver on our objectives, provide accurate and transparent information, and people can rely on one another. Additionally, we aim for top-tier reliability in our operations and technology, on par with the best in the benchmark industry.



Perseverance

We stay the course, even when things get tough. As a team we see obstacles not as roadblocks, but as challenges to be overcome with dedication, creativity, and determination.

This Supplier Code of Conduct describes the principles and standards that apply to suppliers, contractors, subcontractors, advisors and other business partners (“Suppliers”).

Where reference is made to this Code of Conduct in an agreement, assignment or general terms and conditions, it shall form an integral part of the contractual relationship between Xycle and the relevant Supplier. In the event of any conflict between this Code of Conduct and the applicable agreement, purchase order or general terms and conditions, the latter shall prevail unless expressly agreed otherwise in writing.

Xycle reserves the right to modify, revise, or amend the Code of Conduct at its sole discretion, at any given time. Please take note of the date of this document. Any amendment shall take effect 30 days after such notice thereto and shall apply to future orders and, to the extent reasonable, to ongoing contractual relationships.



2. Accounting & Compliance

Reliability and transparency are essential in a regulated industrial environment. We depend on careful compliance with laws and regulations by all parties involved in our value chain.

2.1 Compliance with laws and regulations

Suppliers must comply with all applicable local, national and international laws and regulations in the jurisdictions in which they operate.

This includes, among others:

- Anti-bribery and anti-corruption laws;
- Competition and antitrust laws;
- Sanctions and export control regulations;
- Tax and financial reporting obligations.

Where legal requirements and this Code of Conduct differ, the stricter standard shall apply to the extent legally permissible.

2.2 Transparent recordkeeping

Suppliers shall maintain accurate and complete books, records and accounts that properly reflect all business transactions. Records shall be maintained in accordance with applicable legal requirements and accepted accounting standards.

Suppliers are, among others, not permitted to:

- Falsify documents;
- Provide inaccurate or misleading information;
- Conceal improper payments.

Transactions related to activities for Xycle must be properly documented and capable of explanation upon request.

2.3 Integrity and anti-corruption

Suppliers must conduct business with integrity and transparency.

Suppliers must, among others, not:

- Offer or accept bribes or improper advantages;
- Make facilitation payments;
- Engage third parties to circumvent applicable laws.

All payments must be lawful, proportionate and properly documented.

2.4 Fair competition

Suppliers must act in compliance with applicable competition laws.

Suppliers must, among others, not:

- Engage in price-fixing;
- Allocate markets or customers;
- Manipulate tenders or bids;
- Exchange competitively sensitive information unlawfully.

2.5 Sanctions and trade compliance

Suppliers must comply with all applicable laws governing international trade, including but not limited to sanctions regimes, export controls, import regulations, trade sanctions and embargoes. Suppliers must not engage in transactions that violate applicable sanctions laws.

Suppliers shall ensure that no person, entity, goods, software, technology or service used for the performance of the contractual relationship causes Xycle or the Supplier to violate applicable sanctions or export control laws. Upon reasonable request, Suppliers shall provide information reasonably required to enable Xycle to assess sanctions and export control compliance.

3. Environment

Sustainability lies at the core of Xycle's business model. We aim to close material loops and reduce dependence on fossil resources. This requires responsibility throughout the value chain. We seek cooperation with Suppliers who actively manage their environmental impact and strive for continuous improvement.

3.1 Environmental compliance

Suppliers must comply with applicable environmental laws and maintain required permits.

Suppliers are, among others, expected to:

- Manage emissions, waste streams and discharges responsibly;
- Prevent pollution and environmental damage.

3.2 Efficient and circular use of resources

Suppliers are expected to use natural resources responsibly and take reasonable measures to reduce waste and environmental impact.

Where relevant, Suppliers are expected to support circular material flows and responsible sourcing.

3.3 Climate and energy

Where relevant to the cooperation, Suppliers are expected to address energy consumption and greenhouse gas emissions. Upon reasonable request, Suppliers may be asked to provide relevant environmental data for reporting obligations or supply chain transparency.

Suppliers are encouraged to set measurable environmental performance targets and to pursue continuous improvement in environmental sustainability.

3.4 Prevention of material loss

Suppliers are expected to implement appropriate control measures to prevent material loss, leaks or environmental damage. Safe storage, handling and transport of materials are considered a prerequisite for cooperation.

4. Social

Strong industrial performance begins with people. Safety, respect and fair working conditions are fundamental to sustainable cooperation.

4.1 Human rights

Suppliers shall respect internationally recognized human rights and shall conduct their operations in a manner consistent with the principles set out in internationally recognized human rights frameworks.

This includes, among others, that:

- Suppliers shall not use or support forced, bonded, indentured or involuntary labor, nor shall they engage in any form of human trafficking;
- Suppliers shall comply with applicable child labor laws and shall not employ workers below the legal minimum working age;
- Suppliers shall comply with applicable wage and working hour laws and respect freedom of association where legally permitted.

4.2 Non-discrimination and respect

Suppliers are expected to provide a workplace free from discrimination, harassment and inappropriate conduct. Employees must be treated with dignity and respect.

Employment decisions shall be based on merit, qualifications and job performance.

4.3 Health and safety

Suppliers must provide a safe and healthy working environment and shall implement appropriate policies, procedures and training designed to prevent workplace injuries and occupational illnesses.

Suppliers must, among others:

- Identify and manage operational risks;
- Implement appropriate safety measures;
- Adequately instruct and train employees.

Where activities take place at Xycle locations, all applicable safety rules shall be strictly complied with.

5. Governance

Xycle operates in a regulated industrial environment in which integrity, compliance and risk management are crucial. We expect Suppliers to organize their operations in such a way that internal control measures, clear responsibilities and compliance are structurally embedded. Governance means acting demonstrably and consistently in accordance with laws, contractual agreements and professional standards.

5.1 Integrity and conflicts of interest

Suppliers must act with integrity and transparency. Suppliers shall avoid situations in which personal interests conflict, or appear to conflict, with the interests of the business relationship. Any potential conflict of interest shall be disclosed promptly.

5.2 Confidentiality and data protection

Suppliers must handle Xycle's confidential information with due care and use it solely for agreed business purposes. Suppliers must comply with applicable data protection legislation, including the General Data Protection Regulation (GDPR) where relevant.

5.3 Gifts, hospitality and entertainment

Suppliers shall ensure that any gifts, hospitality or entertainment offered or received in connection with business relationships are reasonable, lawful and not intended to improperly influence business decisions.

5.4 Supply chain due diligence

Suppliers are expected to address risks within their own supply chains relating to:

- Human rights;
- Environment;
- Corruption;
- Legal compliance.

Suppliers are expected to promote equivalent standards within their own supply chains. Xycle may, where reasonable and proportionate, request additional information on such efforts.



6. Compliance, monitoring and reporting

Suppliers are expected to support compliance with this Code of Conduct and to cooperate with reasonable information requests related to its implementation.

Suppliers shall encourage employees and stakeholders to report concerns regarding potential violations of laws, regulations or this Code of Conduct. Reports may be made via the available options on the contact part of Xycle's website.

Suppliers shall notify Xycle without undue delay of any material breach of this Code of Conduct, including but not limited to any material safety incident, any confirmed data breach affecting Xycle information, any sanctions-related issue, or any governmental investigation relevant to the Supplier's performance for Xycle.

Reports shall be handled confidentially and suppliers shall ensure that individuals who raise concerns in good faith are protected from retaliation.

Xycle reserves the right to assess Suppliers' compliance with this Code of Conduct, including through documentation reviews or audits where appropriate. Suppliers shall cooperate in good faith with such assessments and provide relevant information upon reasonable request.

Where serious or repeated non-compliance is identified and not remedied within a reasonable period, Xycle reserves the right to suspend or terminate the contractual relationship, and/or preclude the Supplier from consideration of future business, without prejudice to other contractual or legal rights.

Xycle aims to address potential deviations through dialogue and appropriate corrective measures where possible.

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