

Octa Code

Code of Conduct

Version September 2021

octatube

Introduction

We - the people at Octatube - want to realize challenging architecture. We make the vision of architects and customers feasible by designing and building complex facades, roofs and other special parts of buildings and structures. With innovations that no one has heard of yet and that everyone considers impossible. And that also contribute to a sustainable living environment. We want to have a significant, positive impact on society and the environment with our business operations and activities.

Our core values are leading in this. We call this our Octa DNA. This DNA connects us and determines how we work together with each other and with our customers, suppliers and other partners. Based on this DNA, we have defined the principles in this Code of Conduct.

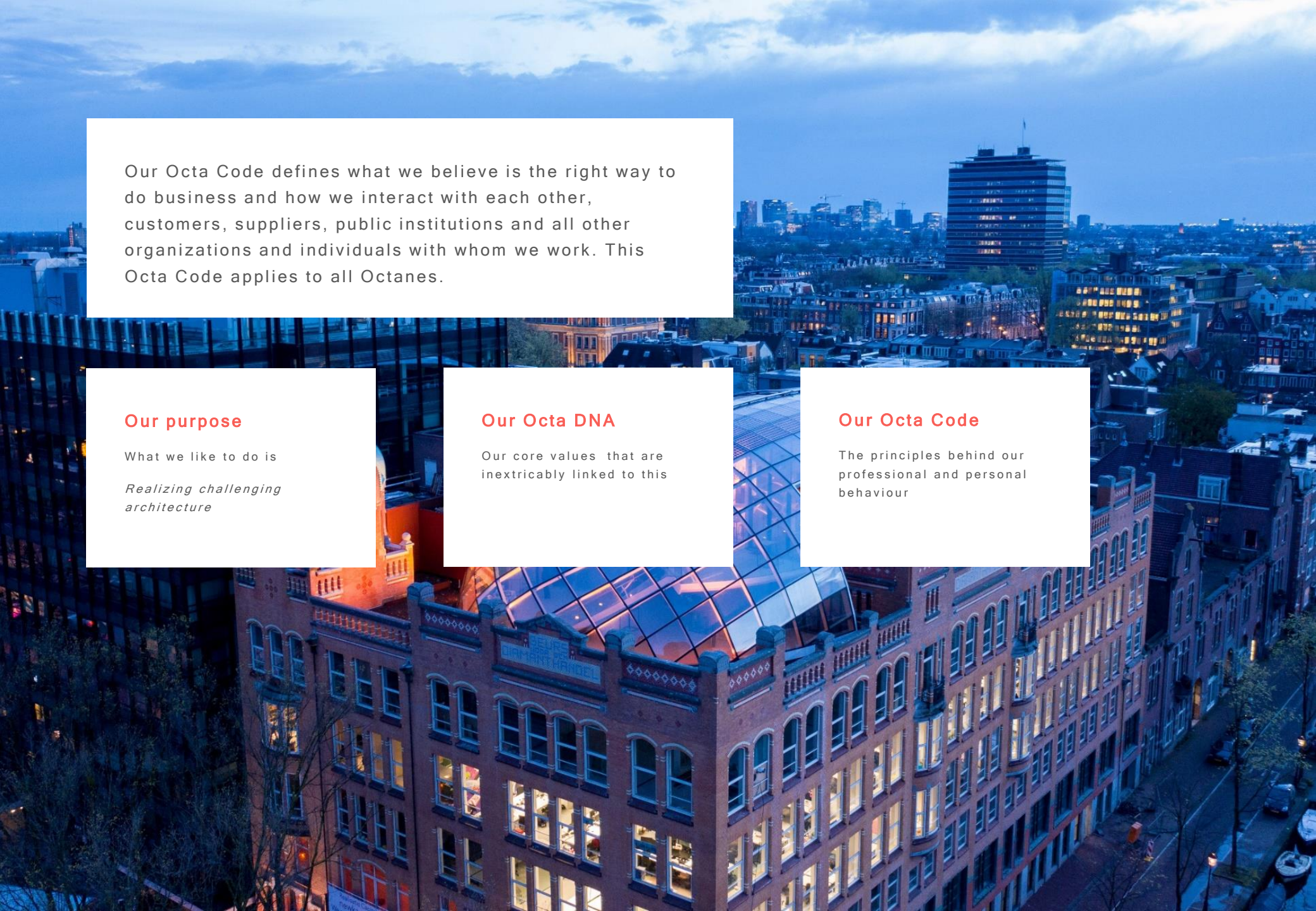
We make hundreds of decisions every day. Some are large and complex, others are small and simple. But we always want to make the right decisions, be able to recognize risks and prevent conflicts. This Code of Conduct helps us with this. It tells us what Octatube stands for, how we do business and how we behave towards each other.

This Code provides a lot of guidance for what we do and what we don't do. Yet there will always be challenging situations and times when it is difficult to tell right from wrong. These are the times to enlist the help of other Octanes to make sure you make the right choices. Even if you see behaviour that you know or suspect is wrong, it is important that you speak up. That is in line with our open and honest way of working together.

While this Code covers many topics, it is not comprehensive. In some cases we have more detailed procedures and tools available. Of course, we ensure that we regularly review this Code so that it is always current and reasonable.

Octatube is a real family business with a lot of attention for each other and for our environment. This Code is consistent with this. We bring this Code to the attention of all Octanes, as well as our customers, suppliers and other parties with whom we work. We ask everyone to read, endorse to and follow this Code. It is an important part of our partnership.

Team Octatube



Our Octa Code defines what we believe is the right way to do business and how we interact with each other, customers, suppliers, public institutions and all other organizations and individuals with whom we work. This Octa Code applies to all Octanes.

Our purpose

What we like to do is
*Realizing challenging
architecture*

Our Octa DNA

Our core values that are
inextricably linked to this

Our Octa Code

The principles behind our
professional and personal
behaviour

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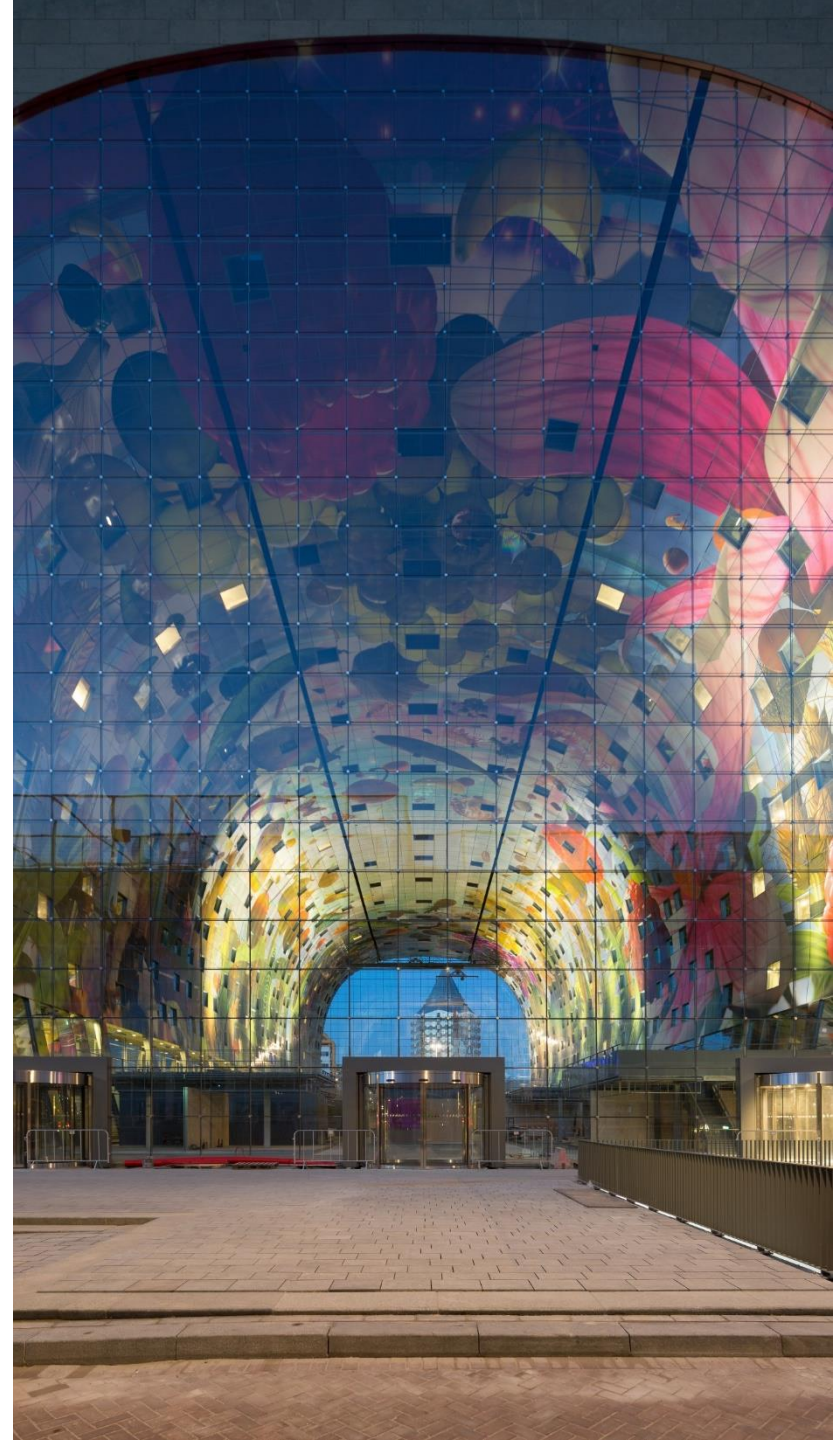
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Speak up

Reporting tensions and
abuses

Realizing challenging Architecture

That's what we do at Octatube. We make challenging architecture feasible and bring to life the most creative and innovative concepts for façades and roofs. Octatube is a design & build company in one. We integrate in our work the design, engineering, production and assembly of complex architectural constructions. We focus on offering high-quality solutions for façades and roofs with innovative and qualitative techniques and materials in which we strive for a sustainable life course. We unburden our customers and challenge ourselves to the maximum. Our work shows that a diverse and creative team can successfully realize unique concepts and thus contribute to a sustainable and inspiring environment for everyone.



Our Octa DNA

This DNA is what we stand for, which makes us unique as a team. It contains the core values that all Octans have in common and that connect us. Our core values determine why and how we do things. They define our diverse and inclusive culture and our personal and professional behavior.

We want to be challenged.

That is why we consciously and actively seek out new incentives that challenge us to come up with new (technical) solutions, use new tools, or think in a new way. The more challenging, the better. Every day a step forward, something new, and every Octane at his or her own level. We never choose the easy way, but rather seek out the thrill of the unknown. We go full of passion for special and challenging projects with a strong drive to make it work.

Together we are stronger.

Creating challenging buildings, no one can do alone. That's a team effort. We believe that by working together we can do much more and perform much better. We connect our individual talents and abilities, strengthening and helping each other to achieve exceptional team performance. We challenge each other to get the best out of ourselves and our team.

We do what we say.

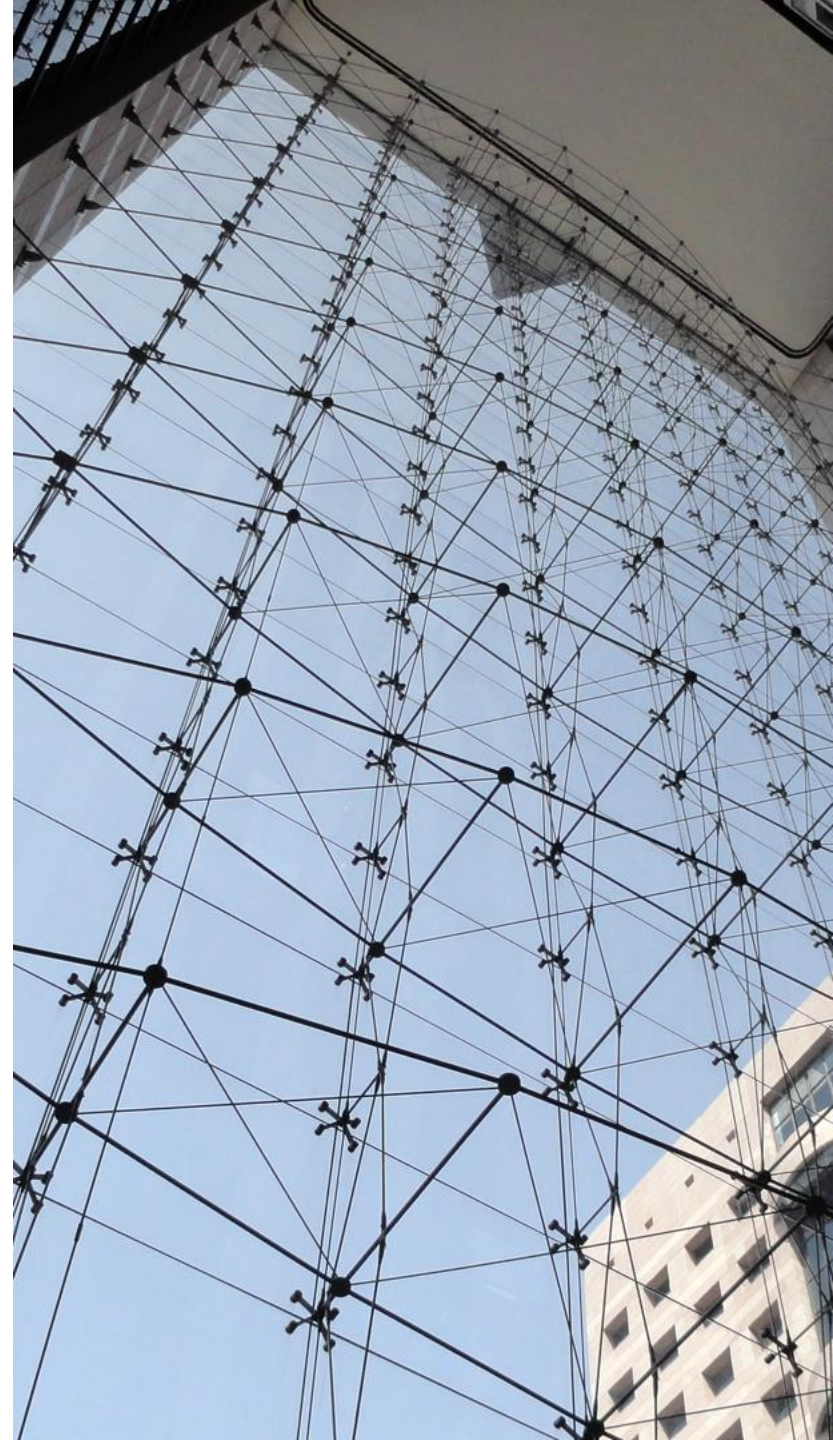
That is the basis of successful cooperation. We are reliable and honest, we honour agreements, tell each other openly what is going well and what is not good and are honest about what we can or cannot do. We are transparent about the risks and tensions we encounter and the choices we make.

We're good at what we do.

We build and rely on our talents and abilities to do so and use them optimally and to the maximum. In addition, we continuously improve our knowledge and skills. This creates an interplay of team players who excel together with individual expertise who dare, want and can meet all challenges.

What we expect from Octanen

We set high standards for the behavior of all Octans. This Code and our common sense enable us to act responsibly on our core values and provide space to appeal to each other. It's your responsibility to do the right thing. When you as an Octaan consistently adhere to this Code, you know that you behave according to our values, our company policy and the law.



Take responsibility

Abide by the law. And all the rules that apply in a given situation. If something is not clear, you can contact HR.

Know the Octa Code and live it. Read the Code and follow the principles. Show that you own our Octa DNA and live our core values.

Think before you act. Use your common sense and judgment ability. Be honest and transparent in everything you do.

- **Respect the tension of another.** Contribute to our strong corporate culture in which everyone feels comfortable expressing his or her tensions. See tensions as an opportunity to improve or change positively and deal with these tensions appropriately.
- **Stay alert.** On all activities that are inconsistent with the Octa Code, with other policies or with the law. This way we stay sharp on everything together and we can improve.
- **Share your tensions openly and honestly.** Don't ignore tensions or abuses. Avoid damaging our company and/or our reputation. Report it if you think the Octa Code is not being adhered to.

Make the right decisions

If you are in a certain situation with doubts about what to do, ask yourself the following questions.

If you need to answer any of these questions with 'no' or 'maybe', then that is the signal to ask for advice from, for example, your Lead Link, confidant or HR.

Is it in line with the OctaCode?

Is it legal?

Does it fit our policy?

Does it benefit the whole of Octatube? (So not just an individual or small group)

Would I feel comfortable if my action was made public?

Our principles

In line with our Octa DNA, our purpose and our ongoing efforts in the field of impactful entrepreneurship, social innovation and sustainability we have formulated several principles: our basic expectations to which Octatube and all Octans must live up to. These principles are based on (inter)national laws and regulations, labour standards and the United Nations Universal Declaration of Human Rights.

These principles also help us to develop and strengthen our cooperation with customers, suppliers and other individuals and parties with whom we do business. We do this based on transparency, trust, honesty and mutual respect. We expect and encourage all our cooperation partners to respect and follow our principles.



Existing laws and regulations

In any case, we comply with all the laws, regulations and regulations of the locations in which we operate, including the rules and regulations for social and environmental performance. If there is a conflict between the law and this Code, the law obviously takes precedence over this Code. If this Code sets higher standards than local legislation, cultural norms or business practice, then this Code takes precedence. We do not tolerate behavior by Octans, customers, suppliers, or other organizations and individuals that are illegal, unethical or violate human rights.



Our professional behaviour

We ensure that we act transparently, reliably, honestly and with mutual respect.

We stand for open and fair competition

Our business success is based on our people, our ideas, our quality and our innovative power. These come together in all our challenging projects and result in exceptional performance. We promote ourselves fairly and compete fairly. We unequivocally support the goal of a free and competitive market. We do not enter into agreements, agreements or commitments that impede free competition.

- We do not tolerate bribery of or by Octatube to influence decision-making by customers, suppliers or authorities.
- We do not share information with competitors about, for example, our pricing policies, terms of sale, development strategies, or other (business) sensitive information. Only in exceptional cases can we proceed to this, but only in consultation with the Sales Circle.

- Obtaining information about competition allows us to better understand where we can improve our offer. We use publicly available resources such as media reports, professional journals, third-party annual and market reports. With caution, we use information about competitors that customers or suppliers provide to us in the context of meeting competitive offers. We never ask our competitor for sensitive information.

We are completely transparent

Our projects are characterized by clarity and transparency. This is also reflected in our working methods. We show at all stages of the project what we do and why we make certain choices.



We make decisions based on understandable information and processes. They are fully and correctly enshrined in accordance with applicable law and regulations.

- We keep a clear, complete, accurate and up-to-date record that accurately reflects our business transactions and business assets.
- We comply with applicable laws, generally accepted accounting principles and our internal accounting procedures.
- We don't have any secret accounting.

We strive for technical excellence and innovation

We act at the top of what is technically (un)possible. We have the drive to be one of the first (existing) new techniques, materials and tools to apply and ideally improve. We continuously improve our own tools and methods to achieve our goals, without losing sight of quality, budget, and planning.


We go for impactful entrepreneurship and social innovation

Octatube is proud to be a B Corp™. We are a Design and Build company with a demonstrable positive social and sustainable impact. B Corp™ has challenged us to be critical in all areas of our business, to look at the company behind our projects.

For this we have gone through a comprehensive assessment process on issues such as safety and health of employees. B Corp™ is also an active incentive to continue to take steps. We therefore use the B Corp certification as a guideline for impactful entrepreneurial and social innovation. We formulate a path and set priorities. In this way we want to make a lasting impact on people, the community and the environment.

We work on sustainability

Octans are aware of the importance of environmentally friendly behavior. We comply with the laws and regulations in force in the field of environmental protection and minimize the impact on the environment. With our environmental management policy, we want to minimize the negative effects of Octatube on the environment. We try to integrate sustainability into our products and services. To reduce the impact of our travel behavior, we encourage everyone to travel by public transport, carpool or take the bike whenever possible. We design, produce, build and maintain with a view to a long life. Whether it's an old building that we're renovating and giving it a new purpose, or a completely new building. We try to prefabricate as much as possible, limit our time on construction and minimize material use without compromising quality. With Octatube Services, we offer specialized knowledge of repair and maintenance, giving a building the right aftercare and extending its life cycle. We strive to continue to learn and improve for our people and planet.



In particular the area of environmental impact, there is still much to be done for us, and in the construction sector as a whole. We are also looking at the United Nations Sustainable Development Goals.

We go for quality

Our focus is on high-quality, specialized and innovative building parts, with customer satisfaction as a starting point. We are ISO 9001 certified. For this we have set up the quality management system to which we all contribute. Every year an annual audit is carried out. We make project control plans and perform product checks to monitor quality. We strive for continuous improvement and increase customer satisfaction. We actively steer on quality-conscious behavior in which everyone has responsibility and dare to think from risks.

We go for win-win situations

We are always actively looking for a healthy balance between what is good for us and what is good for our customer. We do not lose sight of our client's special needs and interests. We want to live up to our customer's trust and are happy to work with customers who think alongside and work on solutions to realize their challenging projects. This forms the basis of our success. We therefore build constructive cooperation relationships with our customers, so that they give us beautiful challenging projects that we like to do and that we are good at. We expect all Octans to be aware of the high standards our customers place on us and of the cooperation we actively strive for.

We pay attention to our community

We work with other businesses and local and national government to create stronger (local) communities. We do this from the realization that Octatube thrives in a sustainable and well-being-oriented environment. That means that we pay care and attention to the world around us.

We don't do bribery or corruption

We do not accept or offer bribes. We do not tolerate any form of bribery, extortion, fraud, favoritism or any other form of corruption by any party or person. Corrupt agreements with customers, suppliers, government officials or other third parties where personal or business advantage is obtained through inappropriate or illegal means are strictly prohibited.

Human rights, child labour, forced labour and minimum wage

We do not violate human rights, do not use child labour or any other form of forced labour. We adhere to international standards. We do not cooperate with parties that do not comply. All Octans are entitled to at least the minimum wage as published by the Dutch government.



Our demands on our business partners

Octatube strives to develop and strengthen partnerships based on transparency, reliability, honesty and mutual respect. In line with our mission and as part of our ongoing efforts in sustainability and social innovation, we have established several requirements to ensure that all business partners, suppliers and manufacturers meet our basic expectations. As a condition of cooperation, we expect our partners (suppliers, contractors, subcontractors, etc.) to recognize this Code and comply with the principles. For our suppliers we use a formal Code of Conduct for suppliers.

Respect the human rights of employees and individuals you work with. Respect the dignity and diversity of each individual.

- Comply with applicable labour laws, labour standards, and legislation on child and forced labour. For example, employees work in accordance with all applicable laws and mandatory industry standards for regular working and overtime (including breaks, rest periods, vacations and leave). We expect a fair and equal remuneration for hours worked and overtime. All work is carried out on a voluntary basis. Respect the right of employees to join associations and employee organisations.
- Ensure a healthy and safe workplace. Abide by all health and safety laws. Provide adequate information and instructions on health and safety issues.

- Enable employees to take responsibility for a healthy and safe workplace.
- Conduct a transparent, adequate and up-to-date administration. Comply with all legal obligations and pay all necessary taxes and charges. We want to be able to monitor and audit the control environment. Set up appropriate management processes and work with reasonable assessment processes at our request.
- Accepting or offering bribes is prohibited. Do not tolerate any form of bribery, extortion, fraud, favoritism or other form of corruption by any party or person. Check for this.
- Please be confidential with all the information we provide.
- Do not tolerate inappropriate behavior such as harassment, discrimination, harassment, violence, retaliation, or other disrespectful behavior.
- Let us know of any conflict of interest.
- Work with us on sustainability and reducing our ecological footprint.
- Allow employees to express their concerns freely and to speak out without fear of reprisals.

Our personal behaviour

We are a team. We work together openly, honestly and transparent with a focus on results. We value safety highly.

We are reliable, open, honest and transparent

We work together in an open and informal environment. We keep appointments, tell each other if something doesn't go well or something doesn't work. We show what we do and why we make certain choices. We work with customers, suppliers and other parties based on trust, integrity, honesty and respect.

We are one team

We believe that only by working together can we get the best out of ourselves and others. We don't want egos or elbow work. We connect our individual talents to excel together. We want to be the best together. As a team, we make every project a success.

We stand and go for our talent

We stimulate and stimulate ourselves and each other to be extraordinary, to constantly make the next step. Learning new things, discovering our hidden talents, building our knowledge and skills are part of that. Each on his or her own level. Following training courses and (personal) development projects and coaching each other is part of our continuous progress.

We are result orientated

Our team effort is focused on the realization of challenging architectural projects. We are always looking for the best way to bring projects to a successful end result, no matter how challenging and exciting this road is.



We are flexible

We can rely on each other and know each others strength and weaknesses. This makes us agile and that offers room to set all sails when needed.

We celebrate our successes

We reflect on what we achieve with each other. All successes - including the small ones - we share with each other and celebrate. This creates even more involvement and a lot of positive energy.

We work safely or we don't work

Together, we are responsible for working healthy and safe. We monitor all safety tricks and tell or warn each other if a situation feels unsafe as such, we can take precautions. We are ISO45001 and VCA** certified.

We avoid conflicts of interest

We make business decisions solely in the interest of Octatube and not on the basis of our own private interests. We want to prevent and prevent the private interest of an Octane from clashing with Octatube's interests.

Conflicts of interest are immediately reported in your circle. For example, if:

- you have family or friends who work for one of our competitors or (possible) business partners, which may lead to conflicting interests.

- You have a personal connection (as partners or relatives) with another Octane.
- As an Octane, you do not perform activities that are competitive with us or that can harm us. This includes, for example, a business interest in or involvement in a competing company.
- If you are a full-time Octaan, you may not perform paid work for third parties without consulting us.
- Part-time Octans with side work are expected to take responsibility for complying with the working time law.
- Moreover, a conflict of interest is not necessarily a breach of this Code. But the immediate announcement of a conflict is a violation.

Sponsorship and charity

Sponsorship is about supporting organizations or events to promote Octatube. We only give donations (in cash or in kind) to non-profit charities, without any immediate business advantage.

- We do not sponsor political goals or parties.
- Charities that we (or you as Octane) support, have no relationship with our clients, suppliers or other relationships
- We don't have a fixed budget for donations. If you have any suggestions for donations, please report to the Stamraad (Company Council)..

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- You are free to set up your own actions for charities and you may ask other Octans to participate

Gifts and hospitality

Gifts and hospitality can help build business relationships. A gift can be an item but also a cash payment, a voucher, a gift card, or anything else of value. Hospitality can include lunches or dinners, entertainment, sport events, travel or accommodation. However, gifts or hospitality offered or accepted in exchange for a favor or business advantage is bribery.

- We do not accept or offer bribes. We do not tolerate any form of bribery, extortion, fraud, favoritism or any other form of corruption by any party or person.
- Use your common sense. Always ask yourself whether offering or accepting an offer, gift or invitation could (let) affect you or someone else in making business decisions. Do you doubt? Share it in your circle.
- Report gifts with a value of more than €10 in your circle. If you want to offer a small gift to a business relationship, tune it within your circle.
- We collect all donations and raffle among all Octans. An example is the Christmas gifts we receive.

Our working environment

We are committed to a pleasant, healthy, safe and inclusive working environment where everyone is respected and valued.

For us, everyone is equal

We are a diverse and inclusive community. We do not discriminate, treat everyone with respect and leave everyone in his or her value. We appreciate each other's input and tensions. Together we create an environment in which everyone is and can be open, honest and sincere. We offer equal employment opportunities to all and apply a fair and fair way of rewarding. Regardless of race, ethnicity, religion, gender, disability, age or sexual preference.

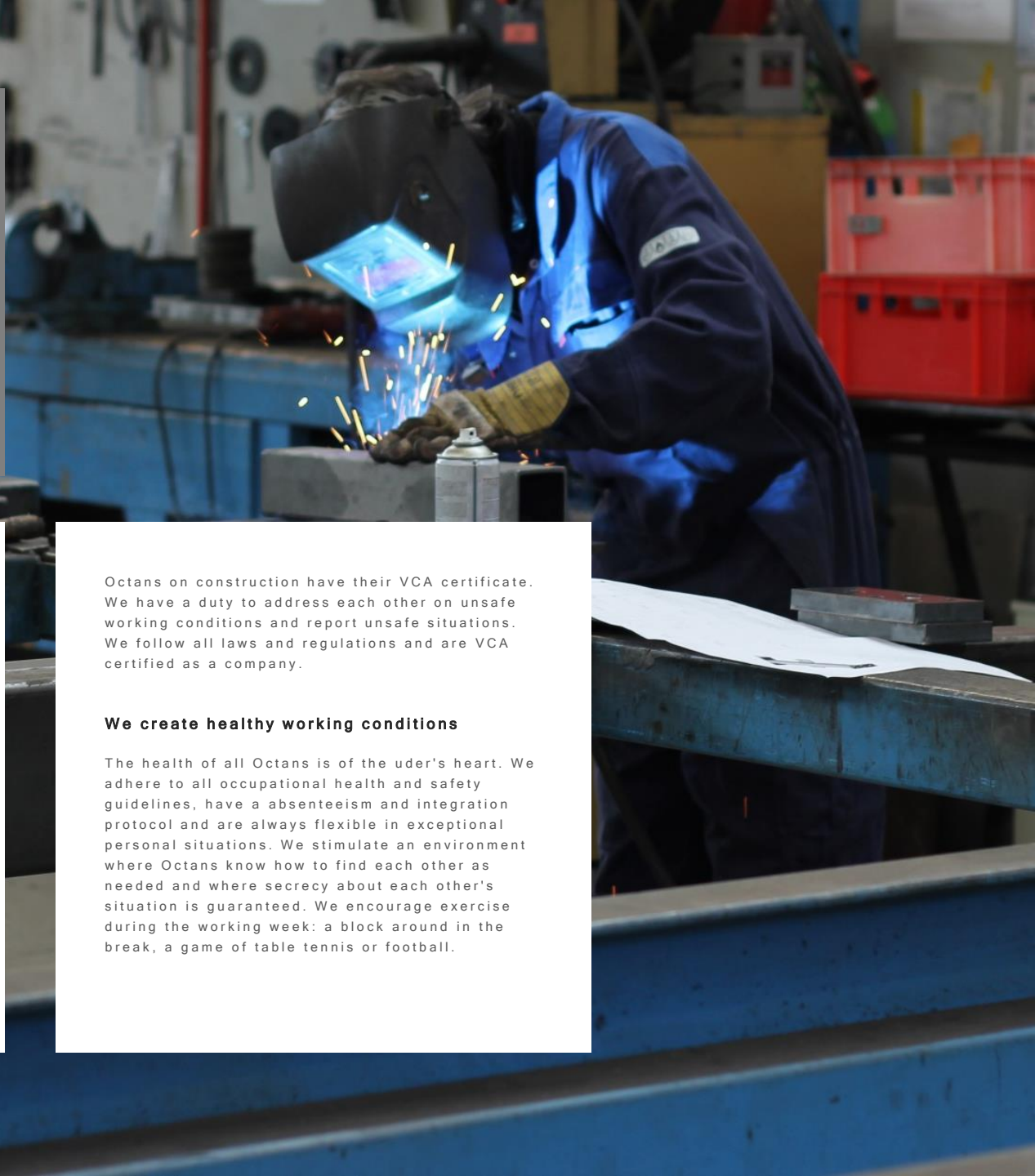
We create safe working conditions

Each Octane actively contributes to creating and maintaining a safe working situation. We take all necessary precautions to protect ourselves, our customers, suppliers and other people who work with.

Octans on construction have their VCA certificate. We have a duty to address each other on unsafe working conditions and report unsafe situations. We follow all laws and regulations and are VCA certified as a company.

We create healthy working conditions

The health of all Octans is of the user's heart. We adhere to all occupational health and safety guidelines, have a absenteeism and integration protocol and are always flexible in exceptional personal situations. We stimulate an environment where Octans know how to find each other as needed and where secrecy about each other's situation is guaranteed. We encourage exercise during the working week: a block around in the break, a game of table tennis or football.



We do not tolerate unwanted behavior

We do not accept harassment, discrimination, abuse, physical or verbal abuse or other unethical behavior. Not from Octanen and of course not from customers, suppliers and other people with whom we interact. Report it if you have any concerns or concerns about this.

Alcohol and other narcotics.

We assume that you are never under the influence of narcotics (alcohol, medicines, soft and hard drugs) at work. We're not going to let you have these resources with you either. Of course, we make an exception for medicines, provided that by using them you do not endanger the health and safety of yourself, of other Octans and other persons with whom you work.

Clean and hygienic

We always leave a clean workplace. Both in the office, in the factory and at the construction site, we don't leave clutter and clean up our papers, pens and tools if we don't use them. We also keep the canteen and toilets clean.





Protection of property and information

We are committed to protecting not only our property and information, but also those of our customers, suppliers and other parties with whom we work.

We protect information

Octans work with confidential data on important projects. Sometimes we acquire sensitive knowledge. We handle this confidentially, do not share this information with third parties without permission and do not use it to our own advantage or to the benefit of friends or family. Nor do we use this information to act with inside information. We do everything we can to prevent confidential and company or project-sensitive information from falling into the wrong hands and thereby harming Octatube or our customers, suppliers or other partners.

We protect the information with all appropriate technical and organizational measures against unauthorized access, unauthorized or fraudulent use, loss and premature destruction. In compliance with the laws and regulations in force.

We respect everyone's privacy

Privacy is a great good. We naturally respect the privacy and confidentiality of personal data of Octanen, customers, suppliers and other people with whom we interact.

We only use this information for the purposes for which we obtained it. We protect this data just like any other confidential information within Octatube.

We respect (intellectual) property

We handle physical property and intellectual property from Octatube, customers, our competitors and other organizations or individuals carefully. We consider specific techniques and solutions, customers, suppliers, price compositions and future projects of Octatube to be "confidential" and we do not share.

Clean desk and clear screen

Information protection also means that we do not leave confidential information on our desk or left on our screen when we are absent ourselves.

- We collect physical documents containing sensitive or confidential information and lock them up when we leave our workplaces.
- When we no longer need these documents, we shred them.
- We make sure that our mobile phones, computers and laptops are locked with a passcode, password or other form of authentication.
- We put our computers on standby when we leave our workplace for example break, toilet visit, etc. We'll shut down the computer when we leave.

Media

Everything we bring out about Octatube affects our reputation, or that of our business relationships. We therefore handle posting messages about ourselves or about the projects we carry out very carefully. Only the authorized roles post messages on our website and our social media channels. You can of course post from our own channels. If you want to post something yourself, always consult with the marketing circle. Contacts with journalists also go through the marketing circle. Are you approached by a journalist to tell us about a project? Then continue this contact to the marketing circle.



Speak up

We think it is important that all Octans want, dare and can speak out when they experience tensions.

Have you experienced anything that makes you feel weird and that you instinctively know isn't right? Have you seen or suspected that an OctaCode is violating the OctaCode? Or are you worried about unethical or unwanted behavior?

- Speak to the Octane in question or bring a tension into your circle. This fits in with our open and honest way of working together.
- If you feel uncomfortable, don't hesitate to contact our confidant or integrity person.
- Of course, we treat your report strictly confidentially and we do not penalize you if you report it. We want Octans to dare to report tensions and abuses. That helps us stay sharp on our ethical behavior.

Confidant

For tensions about, for example, unwanted manners (cases such as aggression, bullying or harassment, or sexual harassment are included) or conflicts in the workplace, within Octatube or in contact with external parties, you can contact our confidant through

vertrouwenspersoon@octatube.nl.

Integrity person

Do you want to get rid of a tension about a financial misconduct or fraud? Then you can contact our integrity person through

compliance@octatube.nl.

Failure to comply with this code

Where people work together there can also be too many problems. It is rare for an Octaan to fail to comply with the Octa Code and/or to violate existing laws and regulations, ignore safety instructions, or exhibit unethical behavior. Still, we would like to notify you for what can happen if you do not follow the Octa Code.

We always talk to you. Depending on your misstep, actions will follow.

- It can be left with a warning. But we may also find it necessary to, for example, (temporarily) put you on hold, to withhold your wages or to deprive you of your privileges.
- We assume that we can prevent further escalation together. If not, it will have consequences for the continuation of your employment contract.