

# The Circulate Initiative Partner Code of Conduct October 2023

## Purpose and Scope

For The Circulate Initiative, acting ethically and responsibly is essential to our mission to solve the ocean plastic pollution challenge and build circular and equitable economies across emerging markets, as well as for our status as a U.S. registered 501(c)(3) non-profit. This Partner Code of Conduct ("**Code of Conduct**") establishes the minimum standards that must be met and sets forth our expectations in areas such as legal compliance, child labor, modern slavery, health and safety, environmental protection, and anti-corruption.

All organizations with contractual relationships with The Circulate Initiative, including but not limited to vendors, suppliers, contractors, consultants, agents, grantees, and others (collectively referred to herein as "**Partners**") are expected to comply with the Code of Conduct as a condition of our relationships. Such Partners shall communicate and apply the principles enumerated in this Code of Conduct throughout their operations and supply chains and shall be responsible for the compliance with this Code of Conduct by its own employees, vendors, suppliers, contractors, consultants, agents, and partners.

## Conduct Principles

All Partners of The Circulate Initiative shall conduct business responsibly, with integrity, honesty, and transparency, and to adhere to the following principles:

- 1. Maintain awareness of and comply with all applicable federal, state, and local laws and regulations of the countries where activities take place.**
- 2. Encourage a diverse workforce and provide a workplace free from discrimination, harassment, and abuse.**

The Circulate Initiative's Partners shall create a work environment in which employees and business partners feel valued and respected for their contributions. Verbal, visual, psychological, or physical harassment, or other conduct of any kind that creates an intimidating, offensive, or hostile work environment, will not be tolerated. Partners shall not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement, or any other employment practice on the basis of race, color, religion, sex, national origin, age, citizenship status, disability, covered veteran or military status, sexual orientation, gender identity, or marital status.

- 3. Compliance with laws on employee wages, working hours, and benefits.**

Partners shall comply with all applicable wage, working hours, and benefits laws and regulatory requirements of the countries in which they operate. There should be no excessive overtime and hours should be paid for appropriately.

- 4. No forced, compulsory or bonded labor.**

Partners shall maintain and promote fundamental human rights including freedom of movement of workers. All labor must be voluntary. Employment decisions must be based on free choice and there can be no coerced or prison labor, and no use of physical punishment or threats of violence or other forms of physical, sexual, psychological, or verbal abuse as a method of discipline or control.

Employment contracts must clearly state the terms of employment and must not restrict worker movement through the retention of identity papers, holding of deposits, or other actions aimed to

prevent worker termination of their employment. Workers must not be required to pay recruitment or other similar fees to obtain or retain their employment, and suppliers shall ensure that any third-party recruitment agencies comply with these principles. Partners shall implement and maintain reliable systems to verify the eligibility of all workers, including age and legal status of any foreign workers, and implement and maintain a reliable recordkeeping system regarding the eligibility of workers.

**5. No use of child labor.**

Partners will not use child labour, as defined by the International Labor Organization (ILO) as individuals under the age of 15 or under the local legal minimum age for work or mandatory schooling age, whichever is the higher. In line with ILO Guidance, in no instance shall a supplier permit younger workers to perform work that is potentially hazardous to their health, safety, or development, or work that may hinder their education or vocational training.

**6. Respect employees' rights to freedom of association and collective bargaining.**

Partners shall respect, and shall not interfere with, the rights of workers to decide whether to lawfully associate with groups, associations and worker organizations of their own choosing, including the right to form or join trade unions and to engage in collective bargaining.

**7. Provide safe and healthy working conditions.**

Partners shall provide a safe, healthy, and sanitary working environment and shall proactively manage health and safety risks to provide an incident-free environment where occupational injuries and illnesses are prevented. Partners shall implement procedures and safeguards to prevent workplace hazards and work-related accidents and injuries. Partners shall ensure that their facilities meet the applicable laws and construction standards and provide access to: safe drinking water; sanitation and hygiene including adequate restrooms and handwashing facilities; fire exits and essential fire safety equipment; appropriate personal protective equipment; emergency aid kits, and access to emergency response services including environmental, fire, and medical.

**8. Perform business activities with care for the environment and comply with all applicable environmental laws and regulations.**

Partners should ensure their business activities comply with all applicable environmental laws and regulations and strive to minimize their impacts on the environment.

**9. Support compliance with the Code of Conduct by establishing appropriate management processes and cooperating with reasonable assessment processes requested by The Circulate Initiative.**

Partners must enter into contracts that mandate compliance with this Code of Conduct. Partners shall adopt requisite policies, procedures, and management systems to support compliance with the expectations outlined in the Code of Conduct. With prior notice, The Circulate Initiative may conduct reasonable audits to verify Partner compliance with the Code of Conduct.

**10. Exercise anti-corruption practices regarding gifts and conflicts of interest when dealing with The Circulate Initiative employees and government officials.**

Partners are prohibited from directly or indirectly making, promising, authorizing, or offering anything of value, including gifts, to The Circulate Initiative employees that could inappropriately influence The Circulate Initiative's decisions, secure an improper advantage, obtain or retain business, or direct business to any other person or entity. Partners are also prohibited from directly or indirectly making, promising, authorizing, or offering anything of value, including gifts, to inappropriately influence a government official's decisions or gain improper advantage.

#### **11. Report suspected violations of the Code of Conduct.**

Partners shall self-report any violations of the Code of Conduct. To the extent not already in place, Partners shall create and maintain effective reporting systems for grievances raised confidentially and anonymously by its employees. Such grievance process and management of potential violations of this Code of Conduct shall, in each case, be consistent with the United Nations Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy Framework” (as such may be amended and restated from time to time). Partner’s employees or contractors shall report suspected violations of this Code of Conduct to The Circulate Initiative at [hello@thecirculateinitiative.org](mailto:hello@thecirculateinitiative.org).