



Code of Conduct

Version sheet

Date	Version	Created by	Description of Change
01-07-2025	1.0	Fulco Rouwhorst	Document created
14-10-2025	1.1	Sicco Ouwersloot	Document modified
13-11-2025	1.2	Bernice Bekkers	Document reviewed

Introduction to the Code of Conduct

Reuzado ICT Services operates within the circular IT industry, where responsible practices, ethical conduct, and respect for human and environmental rights are at the heart of everything we do. This Code of Conduct serves as a foundation for how we work with our partners and suppliers. It outlines the standards and expectations we have for everyone involved in our value chain, ensuring transparency, integrity, and sustainability in all business operations.

Our commitment is not limited to compliance — it reflects our mission to contribute positively to the environment, the people we work with, and the communities we impact. We believe that strong partnerships built on shared values enable meaningful change and create a responsible, circular economy.

This Code draws on globally recognized frameworks, including the RBA Code of Conduct, the OECD Due Diligence Guidelines, the UN Guiding Principles on Business and Human Rights, and the ILO Core Labor Standards. Together, they form the ethical compass that guides Reuzado and its partners toward a sustainable and just future.

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Reuzado Code of Conduct

1. Introduction

Reuzado ICT Services expects its suppliers to adhere to this Code of Conduct (CoC) and ensure that their key suppliers do the same. This Code is an integral part of Reuzado's sustainability policy and supports our mission: promoting a circular IT value chain focused on reuse, human welfare, and environmental protection.

This Code is based on the Responsible Business Alliance (RBA) Code of Conduct, the OECD Due Diligence Guidelines, the UN Guiding Principles on Business and Human Rights (UNGPs), and the ILO Declaration on Fundamental Principles and Rights at Work. Reuzado also endorses the UN Convention on the Rights of the Child (UN CRC), Article 32, which protects children from economic exploitation and harmful work.

2. Scope and Applicability

This Code applies to all Reuzado employees, suppliers, subcontractors, and partners in our circular chain, including collectors, refurbishers, and recyclers. Reuzado encourages broader adoption of these principles throughout the supply chain and expects suppliers to cascade them further.

3. Organization & Reporting Concerns

At Reuzado, we believe in working transparently and fairly — both within our own team and with our partners and suppliers. The responsibility for upholding this Code of Conduct lies with our KAM manager, who reports directly to the Management Team. Each year, this person reviews both our management structure and this Code of Conduct to ensure they still reflect how we work in practice and to identify areas for improvement.

Everyone involved in our supply chain — employees, partners, or other stakeholders — has the right to raise a concern if something doesn't seem right or goes against the principles in this code.

Whenever possible, issues should first be discussed and resolved within the supply chain itself. If this isn't possible or doesn't feel safe and you wish to raise a concern or report a potential violation of this Code, please use our online form available at:

The link to the "Concern Complaint Submission Form " can be found here: [Concern Complaint Submission Form](#)

Reports may be submitted confidentially or anonymously. All submissions are handled in line with Reuzado's Whistleblowing Policy.

We keep our processes well-documented and ensure that everything complies with relevant laws and regulations. This way, we maintain a transparent, trustworthy, and people-centered supply chain — exactly how we believe business should be done at Reuzado.

4. Know Your Counterparty

Suppliers and other stakeholders must comply with all applicable local and international laws, including but not limited to labour rights, human rights, environmental and safety regulations, anti-corruption and anti-money laundering legislation, and export and trade laws.

To ensure that suppliers and other stakeholders meet Reuzado's expectations, we apply our Know Your Counterparty (KYC) policy.

The purpose of this policy is to ensure that Reuzado only engages with reliable, ethical, and legally compliant business partners. Through thorough Know Your Counterparty (KYC) policy Reuzado seeks to prevent involvement in illegal, unethical, or high-risk practices such as fraud, money laundering, human rights violations, or environmental harm. KYC is an integral part of Reuzado's due diligence approach, promoting transparency and trust throughout the value chain.

The link to the "Know Your counterparty policy can be found here: [Know Your Counterparty policy](#)

5. Environmental Responsibility & Circular Economy

Reuzado is committed to advancing a circular economy by extending the life cycle of ICT equipment through refurbishment, repair, and responsible reuse. Our goal is to minimize waste, conserve natural resources, and reduce the overall environmental footprint of our operations and value chain.

We expect all our suppliers and service providers to share this commitment by actively managing and reducing their environmental impact. Sustainable practices should be an integral part of daily operations, from production and logistics to product end-of-life management.

Suppliers are encouraged to integrate innovation, transparency, and continuous improvement into their environmental strategies and to align with internationally recognized sustainability standards and principles.

Minimum Supplier Requirements

All suppliers working with Reuzado must, at a minimum:

- Monitor and reduce their consumption of energy, water, and raw materials through efficient processes and technology improvements.
- Implement effective waste management systems that prioritize reduction, reuse, and recycling of materials.
- Minimize harmful emissions to air, soil, and water and ensure that pollution prevention measures are in place.
- Avoid or minimize hazardous substances and comply with applicable chemical safety regulations, including the REACH and RoHS directives.
- Use sustainable packaging solutions and actively reduce plastic use in all operations and product shipments.

- Promote circular design and eco-innovation by exploring repairability, modularity, and recyclability in products and components.
- Report transparently on environmental performance and set measurable targets for ongoing improvement.

Reuzado recognizes that sustainable transformation is a continuous process. We therefore encourage suppliers to invest in clean technologies, train their employees in environmental awareness, and collaborate on new solutions that support the transition to a circular and climate-resilient ICT sector.

6. Labour & Human Rights

Reuzado and its suppliers are committed to upholding the ILO Core Conventions and international human rights standards. We strive to ensure fair, safe, and dignified working conditions for everyone across our value chain.

Core Commitments:

- No forced or bonded labour – Employment must be freely chosen, and workers may leave their job with reasonable notice.
- No discrimination or harassment – Everyone must be treated with respect and equality, regardless of gender, background, or belief.
- Freedom of association – Workers have the right to organize, join trade unions, and engage in collective bargaining.
- Fair wages and working hours – Compensation must meet or exceed legal and industry standards, and working hours must comply with national labour laws.
- Safe and healthy workplaces – Suppliers must ensure safe facilities, adequate protective equipment, and proper health and safety training.

Child Labour and Young Workers

Reuzado fully complies with ILO Conventions 138 and 182 and Article 32 of the UN Convention on the Rights of the Child. No children under 15 years of age may be employed under any circumstance. Young workers (15–18) may perform only light, non-hazardous work under supervision that does not interfere with their education or well-being.

If child labour is discovered, a remediation plan must be implemented immediately to ensure the child's safety, education, and long-term welfare. Reuzado will work with the supplier to resolve the situation responsibly and prevent recurrence.

Further details on this topic can be found in Reuzado's Child Labour Policy, which outlines our approach to preventing, identifying, and remediating child labour.

The link to the "Child labour policy " can be found here: [Child Labour Policy](#)

7. Ethical Business Conduct

Reuzado upholds high ethical standards and expects suppliers to engage in lawful and transparent business practices.

- Zero tolerance for bribery, corruption, or conflicts of interest.
- No manipulation or misrepresentation of contracts or transactions.
- Compliance with anti-money laundering and antitrust laws.
- Restrictions on gifts and hospitality to avoid undue influence on business decisions.

8. Implementation, Audits & Risk Management

Reuzado conducts periodic risk assessments covering human rights, environment, legal compliance, and ethics. Suppliers may be audited by Reuzado or independent third parties. Findings require corrective action within an agreed timeframe.

Audits may be conducted annually or on a risk-based schedule, depending on the supplier's activity, size, and country of operation.

A confidential grievance mechanism is available for all stakeholders to report concerns to Reuzado's Compliance Officer without fear of retaliation.

The link to the "Concern Complaint Submission Form " can be found here: [Concern Complaint Submission Form](#)

You can find more details about this mechanism and process in our Whistleblowing Policy.

The link to the "Whistleblowing policy " can be found here: [Whistleblowing Policy](#)

9. Continuous Improvement

Reuzado strives for continuous improvement through supplier training, knowledge sharing, and collaboration on sustainability and certification initiatives.

Reuzado provides regular training and awareness sessions for all employees to ensure all employees understand their obligations under this Code

10. Enforcement

Non-compliance may lead to corrective action, suspension, or termination of cooperation. Reuzado reserves the right to claim damages in severe breaches of law or ethical standards.

11. Reference Documents

ILO Core Labour Standards:

<https://www.ilo.org/global/standards/introduction-to-international-labour-standards/core-conventions>

UN Guiding Principles on Business and Human Rights:

<https://www.ohchr.org/en/instruments-mechanisms/instruments/guiding-principles-business-and-human-rights>

OECD Due Diligence Guidance for Responsible Business Conduct:

<https://mneguidelines.oecd.org/due-diligence-guidance-for-responsible-business-conduct.htm>

RBA Code of Conduct: <https://www.responsiblebusiness.org/code-of-conduct/>

UN Convention on the Rights of the Child, Article 32:

<https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>

Dutch Anti-Money Laundering and Terrorism Financing Act (Wwft):

<https://wetten.overheid.nl/BWBR0024282/>

This Child Labour Policy has been reviewed and approved by the Management Team of Reuzado B.V.

It forms part of Reuzado's broader ethical and sustainability framework and aligns with the Reuzado Code of Conduct.

The Management Team commits to ensuring that this policy remains effective, relevant, and reflective of international standards on human rights and labour practices.

Approved by: Reuzado Management Team

Date: July 2025

Next Review: July 2026