

# OctaCode

## Code of Conduct

*Version April 2026*

***octatube***

# Introduction

Octatube realises challenging architecture. We make the vision of architects and clients buildable by designing and constructing complex façades, roofs and other distinctive building components and structures. Through innovative solutions that contribute to a sustainable living environment, we strive to create a positive impact on people, society and the environment.

Our core values form the foundation of everything we do. We call this our Octa-DNA. This DNA connects us and shapes the way we collaborate with each other and with our clients, suppliers and other partners. Based on this Octa-DNA, the principles set out in this Code of Conduct have been established.

Every day, we make choices in our work. Some are large and complex, others small and straightforward. This Code of Conduct helps us make those decisions consciously and carefully. It clarifies what Octatube stands for, how we conduct business and how we treat each other and others.

In our way of working together, Octans take responsibility for their actions and address tensions openly and constructively.

This Code serves as a guideline. It provides direction but is not all-encompassing. In situations where the right course of action is not immediately clear, we seek each other out, share concerns and take collective responsibility. This reflects our open and honest way of working together.

Octatube is a family-owned company with strong attention to people and our surroundings. This Code is a living document that reflects who we are and how we work.

We regularly evaluate and update this Code to ensure it remains aligned with our daily practice, societal developments and applicable laws and regulations.

We share this Code with all Octans and with the parties we collaborate with. We ask everyone to read, endorse and adhere to its principles. In doing so, the Code forms an important foundation for our collaboration.

## Team Octatube

# Structure of this Code

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# 1 Our Foundation

The guiding principles that shape how we work and collaborate.

## Our Purpose

Why we do what we do.

*Realising challenging architecture*

## Our Octa-DNA

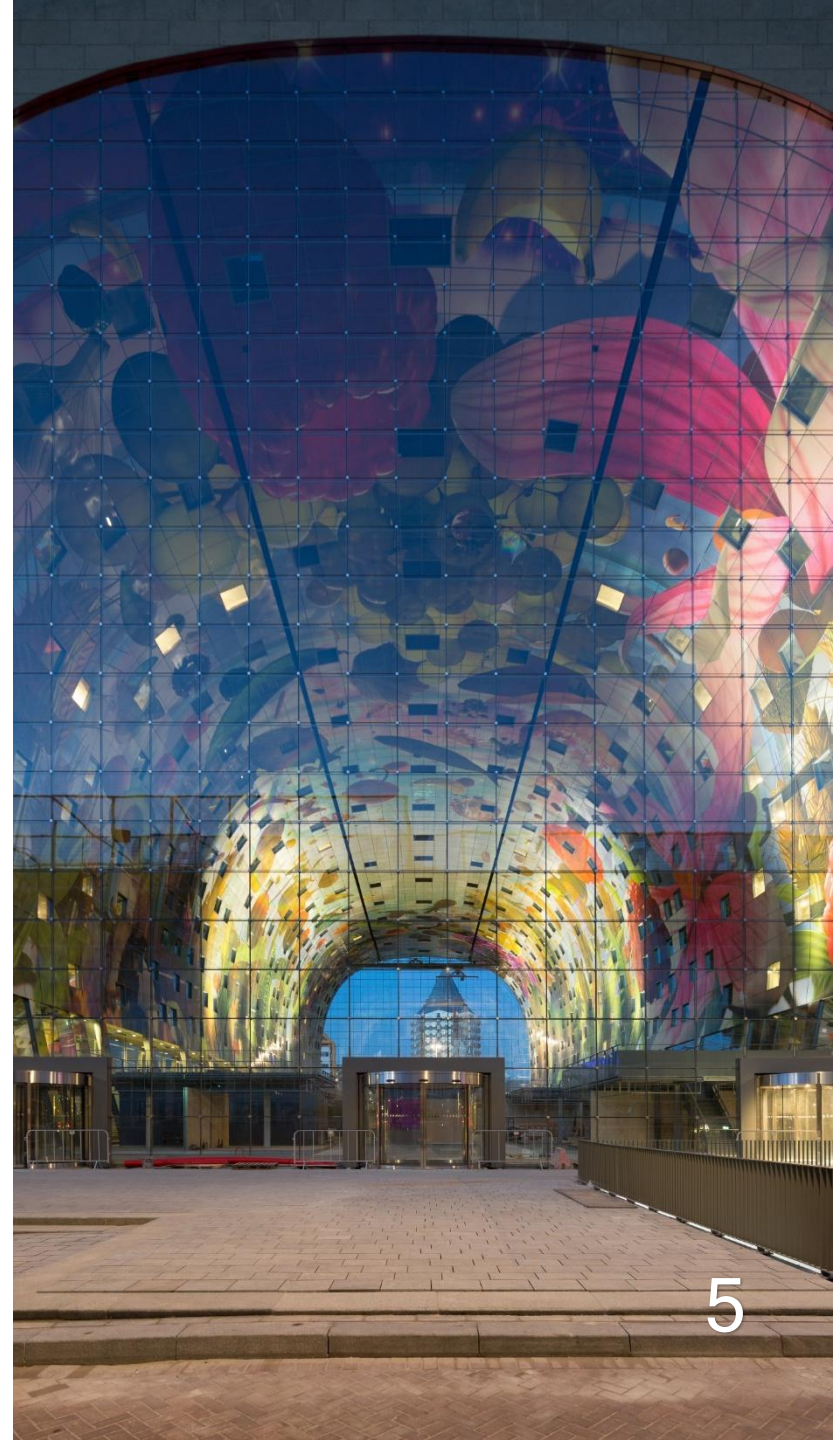
The core values that connect us and shape how we work together.

## Our OctaCode

The principles that guide our daily decisions and align our behaviour with our values.

# Realising challenging architecture

This is what we do at Octatube. We make challenging architecture buildable, bringing creative and innovative façade and roof concepts to life. Octatube is an integrated design & build company. We combine design, engineering, production and installation in the realisation of complex architectural structures. We deliver high-quality façade and roof solutions using innovative techniques and premium materials, with strong focus on a sustainable lifecycle. By taking ownership of complexity, we support our clients while continuously challenging ourselves to perform at the highest level. Our work shows that a diverse and creative team can successfully realise unique concepts and contribute to a sustainable and inspiring built environment for everyone.



# Octa-DNA

This DNA represents who we are and what makes us unique as a team. It contains the core values shared by all Octans, which connect us as one organisation. These values define why and how we do things. They shape our diverse and inclusive culture and guide both our personal and professional behaviour.

## We want to be challenged.

We consciously and actively seek new stimuli that encourage us to develop new (technical) solutions, apply new tools and think in new ways. The bigger the challenge, the stronger our motivation, Every day, we strive to take a step forward, explore new possibilities and grow. We do not choose the easy path; instead, we embrace the tension of the unknown. With passion and determination, we fully commit ourselves fully to unique and complex projects, driven by the ambition to make them succeed.

## Together we are stronger.

Creating challenging buildings is never an individual effort; it is a team endeavour. By working together, we achieve more and perform at a higher level. We connect our individual talents and capabilities, strengthening and supporting one another to deliver strong collective performance. By challenging each other, we bring out the best in ourselves and in our team.

## We do what we say.

This is the foundation of successful collaboration. We are reliable and act with integrity. We keep our commitments, openly discuss what is going well and what is not, and we are honest about what we can and cannot do. We are transparent about the risks and tensions we encounter, as well as the choices we make.

## We are good at what we do.

We build and trust our talents and capabilities, using them to their fullest potential. At the same time, we continuously improve our knowledge and skills. This creates a dynamic team of players who combine their individual expertise to excel together and who dare, want, can take on any challenge.

# Governance & responsibility

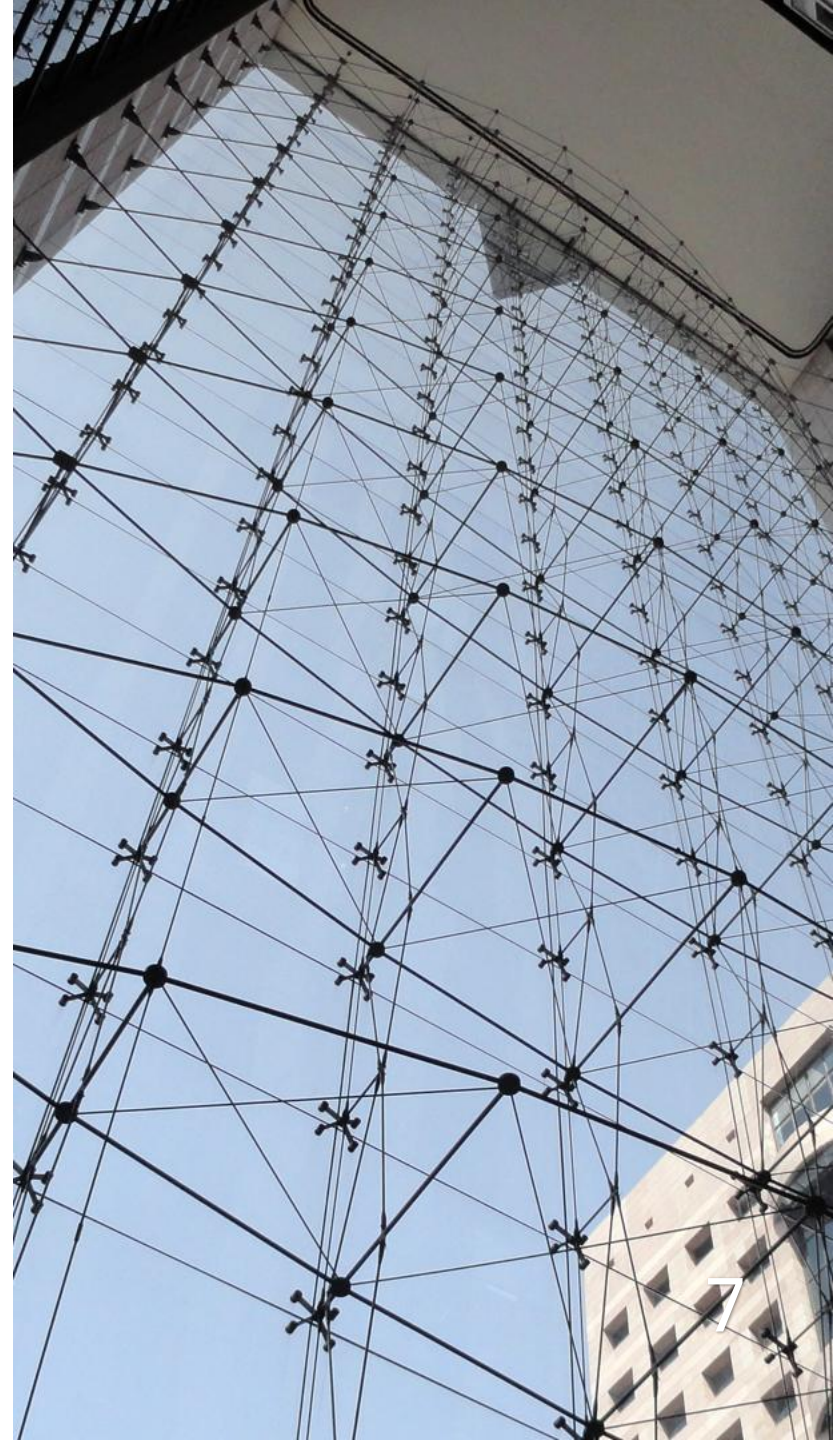
Octatube operates according to the principles of holacracy. This means that we do not have a traditional management structure; instead, we work with roles, circles and clearly defined responsibilities. This Code of Conduct applies to all Octans, regardless of role, circle or type of contract.

Responsibility for complying with, promoting and applying this Code lies collectively with all Octans.

Each Octan is personally responsible for their behaviour and for raising tensions, dilemmas or suspected violations of this Code. Bringing tensions forward and holding one another accountable are essential elements of how we collaborate and improve.

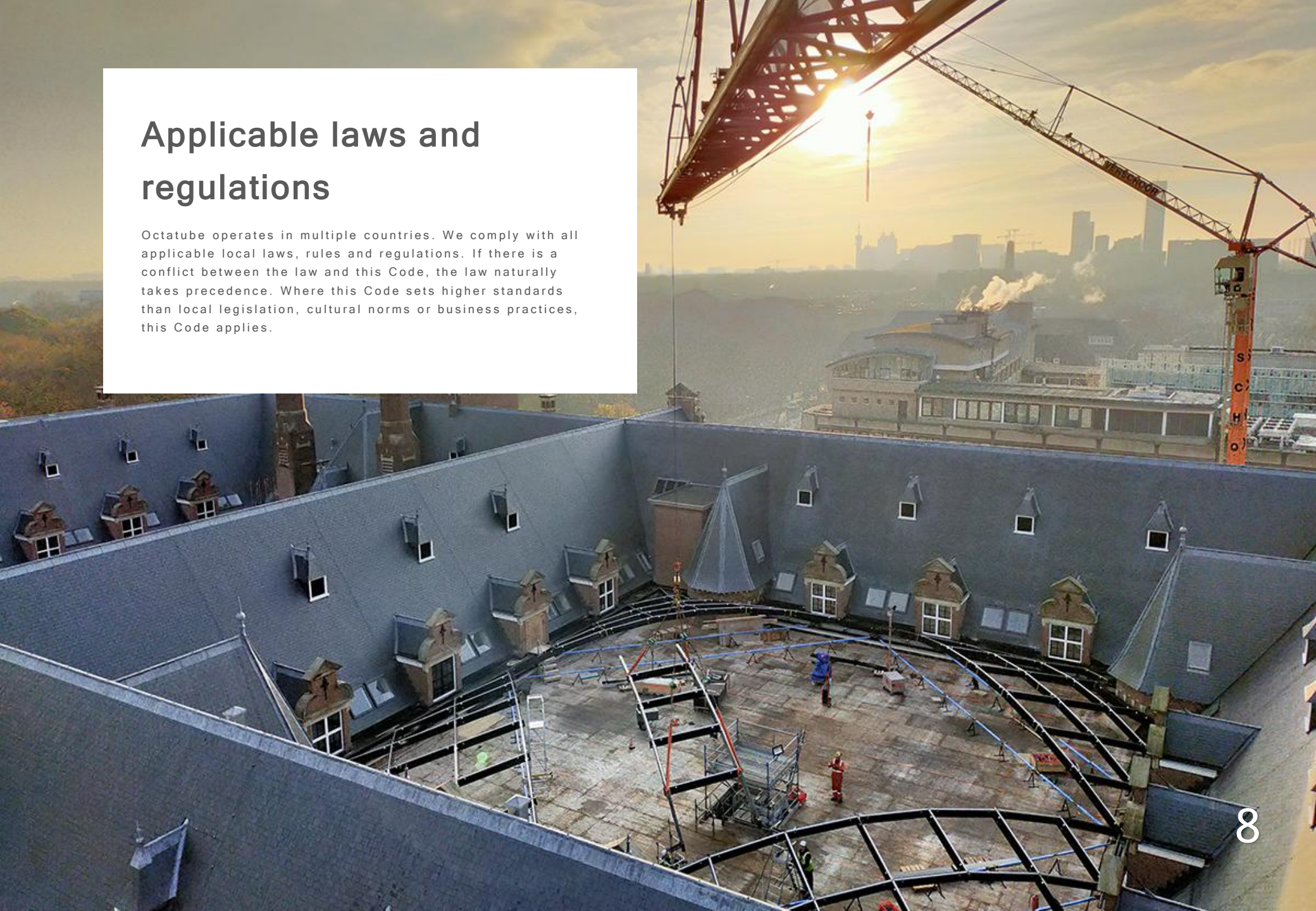
For specific topics such as integrity, reporting, privacy and working conditions, explicit roles have been assigned within Octatube. These roles serve as points of contact for questions, reports and the follow-up of raised tensions.

This Code of Conduct is periodically reviewed and, where necessary, updated by the designated roles and circles to ensure it remains aligned with applicable legislation, societal expectations and Octatube's ambitions in the field of impactful entrepreneurship.



# Applicable laws and regulations

Octatube operates in multiple countries. We comply with all applicable local laws, rules and regulations. If there is a conflict between the law and this Code, the law naturally takes precedence. Where this Code sets higher standards than local legislation, cultural norms or business practices, this Code applies.



# 2

## What we expect from each other

The shared agreements and responsibilities that guide how we work at Octatube.

At Octatube, we uphold high standards for our conduct. This Code, together with our common sense, helps us give meaning to these standards in our daily work. Each Octan is personally responsible for complying with the OctaCode and for addressing others when behaviour is not aligned with our values. In this way, the Code supports us in acting consciously and carefully, in accordance with our values, our policies and the law.

## Take responsibility

Each Octan takes responsibility for their actions. This means acting consciously and reflecting on one's choices.

- **Take the time to think before you act**
- **Use your common sense**
- **Be honest and transparent in what you do**
- **Be aware of tensions - in yourself and in others.**

By acknowledging tensions and viewing them as opportunities to improve, we collectively contribute to an open and strong company culture.

## Make the right decisions

Are you unsure about the right course of action? Then ask yourself the following questions:

- **Is it in line with the OctaCode?**
- **Is it legal?**
- **Does it align with our policies?**
- **Does it benefit Octatube as a whole? (not just an individual or a small group)**
- **Would I feel comfortable if my action became public?**

If you answer “no” or “maybe” to any of these questions, that is a signal to seek advice within your circle, from a confidential advisor or from HR.

**octatube**

# 3 Our Business Conduct

How we operate in the market, work with clients and take responsibility within society.

In line with our Octa-DNA, our purpose and our ongoing commitment to impactful entrepreneurship, social innovation and sustainability, Octatube has established a set of principles that guide how we conduct our business.

These principles are based on applicable (inter)national laws and regulations, recognised labour standards and the United Nations Universal Declaration of Human Rights. Octatube applies a zero-tolerance approach to modern slavery and human

trafficking, in accordance with our policy on this subject.

The principles guide how we develop and strengthen collaboration with clients, suppliers and other parties, based on transparency, trust, fairness and mutual respect. Any conduct by Octanen or by external parties that is illegal, unethical or in violation of human rights is incompatible with Octatube's values and principles.



## **Fair Competition and Integrity**

### **Open and fair competition**

Octatube stands for open and fair competition. Our business success is built on our people, our ideas, our quality and our innovative capability. These elements come together in our projects and form the foundation of how we compete. We present ourselves honestly and act with care and transparency. In doing so, we support the importance of a free and fair market and operate in full compliance with applicable competition laws.

### **Bribery and corruption**

Conduct that restricts free competition, including bribery or other forms of improper influence, is incompatible with Octatube's values and principles. The offering or acceptance of bribes or other forms of corruption is not consistent with the way we operate. Any agreement with clients, suppliers, government officials or other third parties that result in personal or business advantages through improper or illegal means are in violation of this Code.

### **Labour laws and labour standards**

Including legislation relating child labour, forced labour, working hours, rest periods and leave. Work is performed on a voluntary basis, and workers receive fair and equitable compensation for hours worked, including overtime. The right to join or not join associations or workers' organisations is respected.

### **Lobbying and contact with governments**

Octatube does not engage in individual or political lobbying activities. We do participate in transparent and collective forms of advocacy, such as business associations or area-based networks, where companies and public authorities engage in open dialogue on matters related to projects, the working environment and the built environment.

These interactions are focused on compliance with applicable laws and regulations, knowledge sharing and constructive collaboration. We avoid any form of improper influence on decision-making and act openly, carefully and in the general interest. This may also include participation in sector or knowledge networks aimed on developing and sharing technical standards and best practises, without commercial or political influence.

### **Careful handling of competition-sensitive information**

We handle competition-sensitive information with care. We do not share information about pricing policies, sales conditions, development strategies or other confidential business data with competitors. In exceptional situations where collaboration or information exchange is justified and necessary, this will only take place within the framework of applicable agreements and regulations.

We use information about competitors solely to better understand and improve our own offering. Such information is obtained exclusively from publicly available sources, such as trade publications, media reports and market or annual reports. Information provided by clients or suppliers in the context of competitive bids is handled with due care. We never seek or request confidential or sensitive information from competitors.

## **Transparency and due care**

### **Transparency in projects and decision-making**

Our projects are characterised by clarity and transparency. This is reflected in the way we work and in how we make and explain our decisions. Throughout all phases of a project, we strive to clearly communicate what we do and why certain decisions are made.

### **Careful documentation**

Decisions are made based on clear information and well-defined processes. We document these decisions with due care, in accordance with applicable laws and regulations. In this way, we ensure a reliable and traceable way of working.

### **Accurate record-keeping**

We maintain clear, complete and up-to-date records that provide a true and fair view of our business transactions and company assets. In doing so, we act in accordance with applicable laws, generally accepted accounting principles and the agreements in place within Octatube. Hidden or inaccurate records are not consistent with the way we operate.

## **Quality, technical excellence and innovation**

### **Quality in our daily work**

Octatube works with a strong focus on quality. We concentrate on delivering high-quality, specialised solutions, with client satisfaction as a key priority. Quality is embedded in our daily work and in our design, execution and collaboration decisions.

### **Quality assurance**

We operate an established quality management system and are ISO 9001 certified. Within this framework, we prepare project quality control plans and carry out inspections to safeguard the quality of our work. Regular audits help us verify that our processes align with agreed standards and applicable requirements.



#### **Technical excellence and innovation**

We continuously work on technical excellence and innovation. In our projects, we apply both existing and new techniques, materials and tools to make complex architectural challenges achievable. Where appropriate, we further improve and develop these solutions. In doing so, we remain mindful of quality, safety, budget and planning. For us, technical innovation is a means to deliver reliable, high-quality and buildable solutions.

#### **Impactful entrepreneurship and sustainability**

##### **Responsible business conduct**

Octatube is committed to conducting business responsibly and is mindful of the impact of its activities on people, society and the environment. As a design and build company, we look not only at our projects, but also at how we function and collaborate as an organisation.

##### **Sustainability in our daily work**

Sustainability and societal impact play a role in how we carry out our work. Where possible, we make conscious choices in design, procurement, production and execution, with careful consideration for quality, safety and the long term.

In our daily work, we comply with applicable laws and regulations and strive to practically reduce our impact, for example by designing and building with a focus on long service life, efficient use of materials and prefabrication

where appropriate. Through maintenance and repair, we contribute to extending the lifespan of buildings.

##### **Learning and improving through measurement tools**

We use our B Corp certification as a measurement tool to gain insight into our performance and identify areas for improvement. The certification helps us critically assess various aspects of our operations, such as safety, health and sustainability. It encourages us to keep learning and to take targeted steps forward, without assuming we already do everything perfectly.

We also use the Sustainable Development Goals as a reference framework to place our efforts in a broader context.

##### **A pragmatic approach to impact**

We approach social innovation and societal impact pragmatically. We set priorities, make conscious choices and regularly evaluate where we stand. In this way, we work step by step toward improvement, with a realistic understanding of our role as a construction company and with attention to people, communities and the environment.

We recognise that the construct sector faces major challenges and that there is still much for us to improve. For us, sustainability and impactful entrepreneurship are not just an end point, but a continuous process of learning, evaluating and adjusting.

## Collaboration: a win-win

### Balance of interests

We strive for a healthy balance between what is good for Octatube and what is good for our clients. In doing so, we take the interests and needs of our clients into account, without losing sight of our own responsibilities and boundaries.

### Working together based on trust

We prefer to work with clients who value openness, mutual trust and collaboration. By thinking and working together on solutions for complex and challenging projects, we build long-term relationships based on professionalism and respect.

### Responsibility in client relationships

Octans are aware of the expectations clients place on us and act with care, responsibility and a collaborative mindset. This requires careful consideration, clear communication and taking responsibility for the choices we make, with attention to both the project outcome and the partnership.

## Attention to Community

Octatube collaborates with other companies and with local and national authorities where this contributes to strong and healthy communities. We are aware of our role in the environments in which we operate and act with respect for the people and communities around us.



# 4 Our Business Partners

The principles that guide our collaboration with business partners.

The principles that guide our business conduct also form the basis for how we collaborate with our business partners. We work with suppliers, contractors, subcontractors and other parties based on transparency, reliability, fairness and mutual respect.

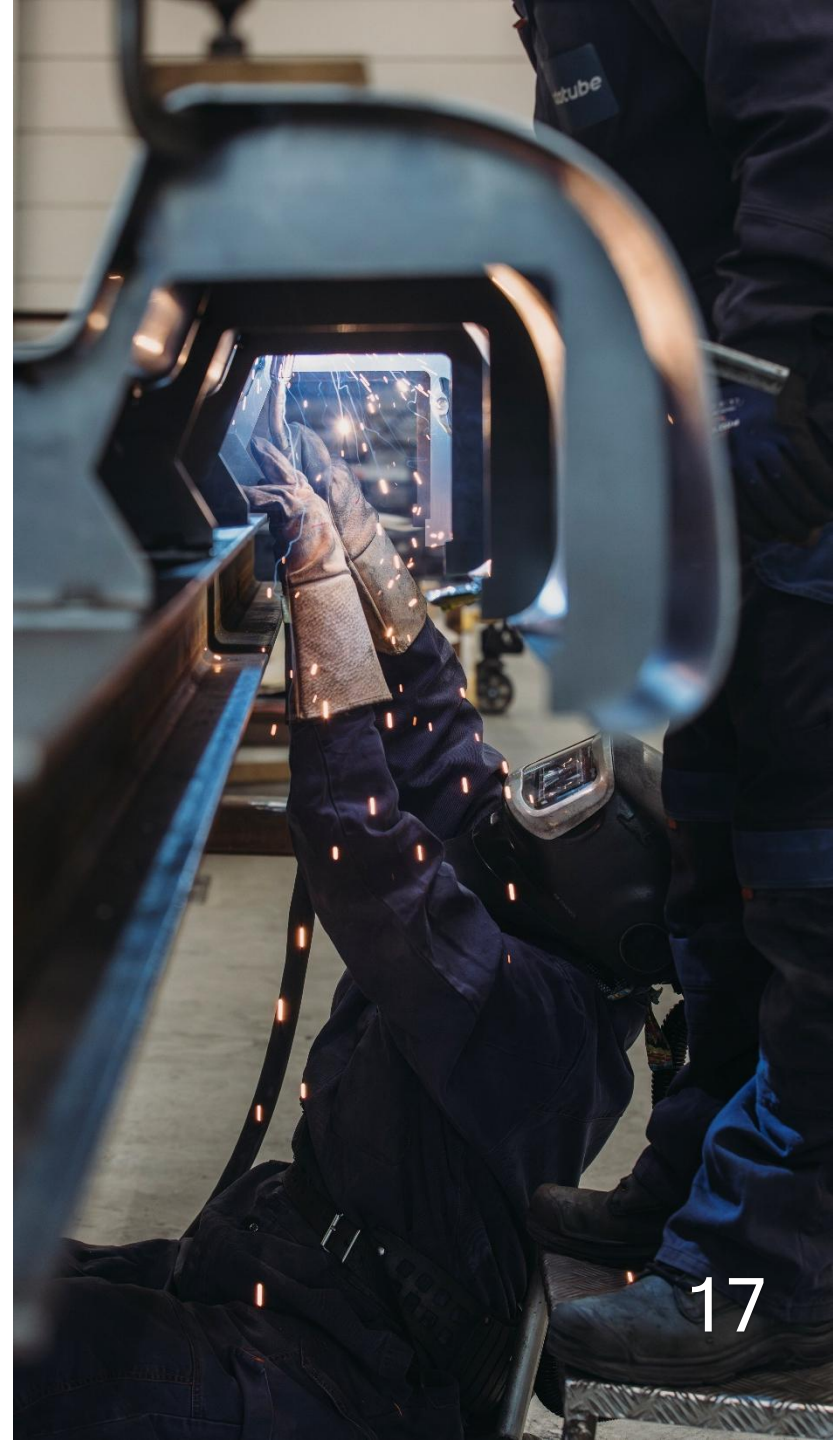
We expect our business partners to acknowledge this Code of Conduct and to comply with the principles described in it. For suppliers, we also maintain a separate Supplier Code of Conduct with additional guidelines.

The expectations below provide direction for our collaboration and are intended to support careful and responsible cooperation. If there are indications that these principles are not being followed, we will address this in dialogue and strive for improvement.

*We expect our business partners to:*

- **Respect human rights**  
and treat the dignity, diversity and rights of employees and other stakeholders with care.
- **Comply with labour laws and labour standards**  
including those relating to child labour, forced labour, working hours, fair pay and freedom of association.
- **Provide a healthy and safe working environment**  
by complying with applicable laws and regulations, providing appropriate instructions and provide a healthy and safe working environment by complying with applicable laws and regulations, having arrangements to address health and safety risks, and empowering employees to help manage their health and safety..

- **Maintain careful and transparent administration**  
that complies with all legal obligations, including the payment of taxes and duties. Upon request, partners cooperate with reasonable forms of monitoring or audit.
- **Refrain from bribery or corruption**  
Accepting or offering bribes, as well as other forms of bribery, extortion, fraud or improper influence, is not consistent with the way of working we pursue.
- **Handle information provided by Octatube confidentially**  
and use it solely for the purpose for which it has been shared.
- **Prevent inappropriate behaviour**  
such as harassment, discrimination, intimidation, violence, retaliation or other disrespectful conduct.
- **Report conflicts of interest**  
when they could influence the collaboration.
- **Work with us towards sustainability**  
and, where possible, contribute to reducing the ecological footprint.
- **Provide space for raising concerns**  
so that employees feel free to speak up about misconduct or concerns without fear of disadvantage or retaliation.



# 5 Our Personal Conduct

How Octans interact with one another and take responsibility for their daily work.

## **Collaboration with openness and respect**

We work together as one team. This means we interact openly and honestly, keep our commitments and inform one another when something does not go as planned or cannot be achieved. We are transparent about what we do and why we make certain decisions. In our collaboration with colleagues, clients and other parties, we act with trust, integrity, fairness and respect.

## **Strengthening and holding one another accountable**

We believe that only by working together can we bring out the best in ourselves and in others. We avoid ego-driven behaviour and internal competition and instead use our individual talents to achieve strong results together.

This also means that we hold each other accountable for our behaviour and collaboration, in a respectful and constructive manner.

## **Talent development and ownership**

Octans take responsibility for their own development and actively contribute to the development of others. Learning, continuous personal growth and sharing knowledge and experience are part of how we work. Each of us does this at our own level, for instance through education, training, coaching and collaboration.

## **Working with a focus on results and flexibility**

We work purposefully on challenging projects and, together, look for the best way to achieve strong results. We remain flexible



and aligned with one another, so that we can adjust when circumstances require it and support one another when needed.

### **Sharing successes**

We take time to reflect on what we achieve together. Both large and small successes are shared and celebrated. This strengthens our engagement and contributes to a positive and energetic working environment.

### **Safety as a shared responsibility**

Working safely is a shared responsibility. We follow safety instructions, speak up when a situation feels unsafe and take appropriate action. Safety is not an individual choice but an integral part of how we work together. We either work safely or we do not work at all.

### **Preventing conflicts of interest**

Business decisions are always made in the best interest of Octatube. We avoid situations in which personal interests could conflict with those of the organisation. If such a situation does arise, we address it openly within our internal teams. The existence of a conflict of interest is not necessarily a violation, failing to report is.

### **Sponsorship and charitable contributions**

Sponsorships and donations are intended to support social initiatives, without a direct business benefit. We do not sponsor political parties or political causes. Charitable activities supported by Octans are separate from our business relationships. Proposals for donations are discussed within the designated circles and meetings.

### **Gifts and hospitality**

Gifts and hospitality may contribute to good relationships but may never lead to improper influence. Offering or accepting gifts or invitations in exchange for a favour or business advantage is not allowed and is considered bribery. We use our common sense and discuss any such offers if there is doubt about giving or accepting them. Gifts above a limited value are reported within our circle; received gifts are shared or raffled among colleagues.

# 6

## Our Working Environment

The conditions that support a safe, healthy and respectful workplace.

### Equality and inclusion

At Octatube, we treat one another with equality and respect. Together, we create an environment in which everyone can be open, honest and authentic. Discrimination or exclusion is not accepted. We offer equal opportunities in work and development and apply a fair and careful approach to compensation, regardless of background, beliefs, gender, age, disability or sexual orientation. We provide equal opportunities in recruitment, development, career progression and compensation. For us, equality is a fundamental principle.

### Safe working conditions

Every Octan contributes to a safe working environment. We make appropriate arrangements to protect ourselves and others,

and address unsafe situations promptly. For work on construction sites, additional safety requirements apply, including holding a valid VCA certificate (or in the UK, a CSCS card). We operate in accordance with applicable laws and regulations and are an VCA\*\*and ISO 45001-certified organisation.

### Health and well-being

The health of Octans comes first. We follow applicable occupational health and safety (Arbo) guidelines and have provisions in place for absence and reintegration. We handle personal situations with flexibility and care and respect confidentiality. We encourage a working environment where there is room for recovery, movement and mutual support.

## Respectful conduct

We do not tolerate intimidation, discrimination, bullying, abuse, violence or any other form of inappropriate behaviour. This applies to everyone, regardless of role or position, and in contact with clients, suppliers and other third parties. Signals or concerns are addressed openly and reported in accordance with the agreements set out in this Code.

## Alcohol and drugs

We do not work under the influence of alcohol or other drugs. The use or possession of such substances during work is not permitted. Only prescribed medication which does not endanger the safety of yourself or others may be used at work

## A clean and orderly workplace

Together, we maintain a clean, safe and orderly working environment. Workspaces, offices, production locations and construction sites are left tidy, and we handle materials, tools and shared facilities with care.



# 7 Protection of Property and Information

How we carefully handle information, assets and communication responsibly.

## Handling information with care

Octans work with confidential and sometimes sensitive information. We handle this information carefully and treat it as confidential. We do not share information with third parties without permission and do not use it for personal benefit or for the benefit of friends or family. Information is never used for insider trading purposes.

We take appropriate technical and organisational measures to protect

confidential, company and project-sensitive information against unauthorized access, misuse, loss or premature destruction, in accordance with applicable laws and regulations. Suspected data breaches or security incidents are reported immediately in line with the applicable data breach protocol.

## Privacy and personal data

We respect the privacy and confidentiality of the personal data of Octans, clients, suppliers and other stakeholders. We use this

data only for the purposes for which it was obtained and protect it with the same level of care as other confidential information within Octatube.

### **Respecting (intellectual) property**

We handle both physical and intellectual property of Octatube and of third parties, such as clients, suppliers and even competitor, with care. Information about techniques, solutions, clients, suppliers, pricing structures and future projects is considered confidential and is not shared without explicit permission.

### **Clean desk and clear screen**

Protecting information also means acting carefully in practice. We do not leave confidential information unattended on desks or screens and store physical documents securely when leaving our workspace. Digital devices such as laptops, computers and mobile phones are protected with appropriate access measures. Confidential documents that are no longer needed are disposed of in a secure manner.

### **Media, image usage and copyright**

Everything we share externally about Octatube and our projects affects our reputation and that of our clients and partners. Therefore, we communicate carefully and consciously. Only designated roles publish messages on

Octatube's official website and social media channels. Sharing posts from our official channels through personal accounts is allowed. If you wish to publish something yourself or are approached by a journalist, you should always coordinate this with the Marketing Circle.

When using texts, photos, videos and other visual material, we respect copyrights and licensing agreements. Content created by or on behalf of Octatube may only be used within the agreed frameworks. Visual material provided by external photographers or other creators is used only in accordance with the agreed licenses and for the specified purposes.

It is not permitted to share visual material of Octatube, clients or partners externally without permission, to make it available to third parties or to use it for purposes other than those for which it was obtained. This also applies to photos taken by Octans themselves during work or on projects.



# 8

## Speak Up

How tensions, concerns and suspected misconduct can be raised and addressed.

### Speaking up is part of how we work

At Octatube, we believe it is important that everyone feels able, encouraged and supported to speak up. Have you experienced something that does not feel right? Do you see behaviour that, in your view, does not align with our values or with this Code? Or are you concerned about unethical or inappropriate conduct? If so, we encourage you to raise the issue.

You do not need to be certain that a violation has occurred. Doubts, concerns or suspicions are also sufficient reason to start a conversation.

### Discuss it first where possible

Where possible, address the Octan involved directly or raise your tension within your circle. This fits with our open and honest way of working together and often helps resolve tensions at an early stage.

If you do not feel comfortable doing this or if the situation is too sensitive, there are other safe routes available.

### Confidential advisor

For tensions related to inappropriate behaviour, such as intimidation, bullying, aggression, discrimination or sexual misconduct and for conflicts in the workplace within Octatube or in contact with external parties, you can contact our confidential advisor at [vertrouwenspersoon@octatube.nl](mailto:vertrouwenspersoon@octatube.nl).

The confidential advisor will listen, support you and help you consider possible next steps.

### Integrity Officer

For concerns or suspicions regarding financial misconduct, fraud or other integrity-related issues, you can contact our Integrity Officer at [compliance@octatube.nl](mailto:compliance@octatube.nl).

## Whistleblowing (protected disclosures)

We encourage and investigate reports about wrongdoings that arise in a work-related context and affect the public interest, per our whistleblowing procedure. Anyone making a whistleblowing report in good faith is protected from detriment.

## Confidentiality and protection

Reports are handled with care and confidentiality. Octatube does not tolerate any form of disadvantage, retaliation or negative consequences for individuals who report concerns in good faith. Raising concerns or potential misconduct helps us remain a vigilant and principled organisation.

## Non-compliance with this Code

If this Code or applicable laws and regulations are not followed, the matter will always be discussed. Depending on the situation and within the applicable agreements and role structure, appropriate measures may be taken. Octatube aims to address tensions and violations in a careful and transparent manner.

## Reports by external parties

Business partners, suppliers and other stakeholders can also report suspicions of unethical behaviour or violations of this Code. They may use the same channels to do so. For them as well, reports will be treated confidentially, and any form of disadvantage or retaliation will not be accepted.

