



CIRCULARISE

Gender Equality Plan

January 2026

CONTENTS

1.	Introduction	03
2.	Context and Rationale	04
3.	Baseline Assessment	07
4.	Objectives and Strategic Priorities	08
5.	Actions and Measures for Implementations	10
6.	Governance, Roles and Responsibilities	16
7.	Evaluation and Review	16
8.	Communication	17

Since its foundation in 2016, Circularise has been guided by the values of transparency, sustainability, and social responsibility. These principles have not only shaped our technological and environmental objectives but also our approach to how the company operates. In striving to make global supply chains more resilient and circular, Circularise recognizes that the same commitment to sustainability must be mirrored within our own organization, through the creation of an inclusive, equitable, and diverse working environment where every individual can thrive.

Aqual opportunity and merit-based advancement are essential components of a sustainable and innovative company. They strengthen creativity, improve decision-making, and lead to more robust and socially responsible outcomes. From its early days, Circularise has recognised the importance of gender equality as a fundamental value, and has worked towards building an internal culture that promotes respect, fairness, and equal opportunity for all. This Gender Equality Plan (GEP) represents a natural continuation and formalization of these efforts, aligning our organizational culture with the European Union's objectives in research and innovation (R&I), as well as the Horizon Europe eligibility requirements.

The purpose of this GEP is to establish a structured framework of actions and commitments that ensure equal treatment and opportunities for all employees, regardless of gender, and to foster a workplace culture grounded in inclusion and respect. This plan builds on existing policies, informal practices, and staff engagement initiatives, and provides a roadmap for continuous improvement over the coming years.

Circularise firmly believes that achieving sustainability requires a holistic approach. Our mission to enable circular economies through digital transparency extends beyond technology. It encompasses people and the way we work together. In the same way we seek to minimize environmental impact and promote resource efficiency externally, we also strive internally to create a socially sustainable organization, where equal opportunity and merit-based advancement are integral to our success.

This plan has been endorsed by Circularise's executive leadership and developed in consultation with staff representatives, reflecting our collective commitment to equality and inclusion. The present will be made publicly available on the company's website, shared with stakeholders, and integrated into our overall strategic framework. Through this Gender Equality Plan, Circularise reinforces its belief that a circular, fair, and innovative future depends equally on the technologies we create and the principles by which we operate.

02

Context & Rationale

Gender equality is a founding value of the European Union and a key driver for its political, social, and economic development. Since 2016, the year of the establishment of Circularise, the EU has made significant progress in promoting gender equality across all sectors, particularly within research, innovation, and technology. The European Commission's **Gender Equality Strategy 2020–2025** reaffirmed gender equality as a cross-cutting priority, requiring all EU institutions, Member States, and funded organizations to ensure gender mainstreaming in all their activities. This has led to new legal obligations, targeted funding measures, and greater public accountability for gender balance in leadership, decision-making, and employment.

In the last decade, Europe witnessed measurable growth in terms of gender balance. According to the **EIGE Gender Equality Index**, the overall score increased from 66.2 in 2015 to 70.2 in 2023, reflecting improvements in work participation, education, and access to power and resources. Initiatives such as **Horizon 2020** and **Horizon Europe** introduced gender equality plans as mandatory eligibility criteria for public funding, embedding equality at the heart of innovation ecosystems. Yet, challenges remain, as certain groups may be underrepresented in ICT, engineering, and senior decision-making roles. We aim to ensure equal opportunities for all based on merit.

Over the same timeframe, the COVID-19 pandemic marked both a setback and a turning point. While it exacerbated existing inequalities, disproportionately impacting women through increased care responsibilities and job insecurity, it also accelerated conversations on flexible work, wellbeing, and inclusion. As hybrid and remote work models became mainstream, new opportunities emerged for rethinking organizational culture and promoting equitable work-life balance.

Circularise recognizes these lessons, learning and integrating them into its internal structures, fostering equality, flexibility, and fairness in its structural operations. Our company aspires not only to comply with EU frameworks but to set an example for gender equality within the green and digital sectors. The EU's commitment to equality, diversity, and inclusion serves as a benchmark for quality, governance, and circularity worldwide. Just as European environmental standards influence global markets, Circularise believes that European values on equality and social responsibility should define the gold standard for ethical and sustainable business practices. As a company operating across international value chains, we aim to demonstrate that sustainability and gender equality are mutually reinforcing, as they both aim to create systems that respect balance, transparency, and long-term value.

2.1 The Dutch Legal and Policy Context

Circularise is a technology company headquartered in The Hague, the Netherlands, a country with a strong legal framework supporting gender equality and non-discrimination. The Dutch *Gender Equal Treatment Act* (Algemene Wet Gelijke Behandeling), enacted in 1994, prohibits discrimination based on gender, race, religion, sexual orientation, and other grounds in employment and education. The *Working Conditions Act* (Arbowet) and subsequent amendments strengthen provisions for parental leave, flexible work, and work-life balance.

In recent years, the Netherlands has further reinforced its commitment to equality with the *Gender Balance in Management and Supervisory Boards Act*, which entered into force in 2021. This law requires large public and private companies to ensure at least one-third representation of women on their supervisory boards and mandates annual reporting of progress to the Social and Economic Council (Sociaal-Economische Raad, SER). However, medium-sized enterprises such as Circularise are not legally bound by this quota.

The Dutch government also implements national emancipation strategies, most recently the *Emancipation Policy Plan 2022–2025*, which sets priorities for improving economic independence for all, reducing pay gaps, increasing leadership and participation in technology and entrepreneurship for all qualified individuals, promoting equality in education, caregiving, and safety.

Institutionally, gender equality in the Netherlands is supported through formal mechanisms for policy evaluation and monitoring. Gender mainstreaming is incorporated into the national policy cycle via the *Integrated Assessment Framework* (Integraal Afwegingskader, IAK), which requires ministries to assess how new legislation or major policies might affect gender equality. Additionally, the Emancipation Monitor (Emancipatiemonitor), a collaboration between Statistics Netherlands (CBS) and the Netherlands Institute for Social Research, collects and publishes comprehensive sex-disaggregated data every two years, tracking progress in areas such as employment, education, health, and caregiving.

Overall, according to the **European Institute for Gender Equality (EIGE)**, the Netherlands performs above the EU average in gender mainstreaming and institutional mechanisms for equality, showing notable progress in recent years. However, EIGE also highlights ongoing challenges, such as gender budgeting, as it is not a legal or standardized requirement across all ministries, and gender equality training, as it is not consistently mandatory across institutions. These findings suggest that although the Netherlands provides a robust framework, there is room for organizations to take the lead in deepening gender mainstreaming practices. Circularise embraces this opportunity, by aligning with national legislation and extending its principles beyond compliance. Indeed, the company seeks to exemplify how a modern, sustainability-driven enterprise can integrate equality into every aspect of its governance, regardless of its size. Building upon the Netherlands' legal and institutional strengths, Circularise aims to pioneer a model where environmental sustainability and social equality advance in tandem, contributing to both national and European ambitions for a fair and inclusive future.

2.2 Rationale

This GEP responds to both external expectations and internal ambitions. Circularise recognises that achieving gender equality is not only a matter of compliance with national and European requirements, but a cardinal starting point. Studies across Europe have demonstrated that gender-diverse organizations perform better in innovation, governance, and risk management.

Furthermore, as Circularise engages with global partners and clients who view the EU as a reference point for sustainability and ethics, this plan positions the company as a leader in embedding social responsibility alongside environmental performance.

Through this Gender Equality Plan, Circularise intends to **strengthen its internal culture, inspire our partners, and contribute to a European innovation ecosystem where equality and sustainability advance together.** By applying to all areas of our operations, from research and development to sales and project managements, our company aligns the same EU standards throughout all of its branches, including its Japanese counterpart, Circularise Japan K.K.

03 Baseline Assessment

To conduct the following analysis, Circularise carried out an extensive review of its internal HR data, examining gender distribution across staff roles, recruitment, payslips, promotions, and turnover over the years.

To provide a clear overview of the company's current structure, Circularise is composed of 48 employees, distributed across the following departments:

- Customer Success (8.3%)
- EU Research & Government Affairs (8.3%)
- Product & Engineering (33.3%)
- Finance & Legal (4.2%)
- Human Resources (4.2%)
- IT Management (2.1%)
- Operations (4.2%)
- Management (4.2%)
- Marketing (16.7%)
- Sales (8.3%)
- Strategy (6.3%)

The total headcount consists of **27 male employees (56.25%)** and **21 female employees (43.75%)**. Circularise is proud to be an international company, with a culturally diverse team representing **29 nationalities**.

04

Objectives & Strategic Priorities

Drawing upon the EU Gender Equality Strategy 2020-2025 and looking ahead to the upcoming 2026-2030 Strategy, Circularise's GEP central scope is anchored in the understanding that genuine equality requires a systemic, long-term approach that goes beyond numerical representation, socially scaling up in innovation and entrepreneurship among its community. As a diverse ecosystem, the company recognizes that gender equality intersects with other dimensions of identity which include ethnicity, age, nationality, sexual orientation, and disability. Progress can only be made by addressing these intersections collectively. Therefore, Circularise's strategic priorities extend beyond gender balance alone, embracing a broader commitment to inclusivity, social justice, and equitable participation.

The overarching goal of the GEP is to integrate gender and diversity considerations into every aspect of Circularise's governance, culture, and operations. This means ensuring that gender equality is not treated as a stand-alone policy area but as an inherent part of how the company defines excellence, leadership, and innovation. The plan seeks to embed equality as a guiding principle in decision-making, recruitment, performance management, and research and innovation activities. In light of the above, Circularise will focus on the following objectives:

1. **Enhance gender balance in recruitment, retention and promotion**

Circularise's first objective is to achieve gender balance in recruitment, retention, and promotion, particularly within technical and leadership roles where certain groups may remain a minority. This involves actively identifying and removing structural barriers that may limit access to opportunities, fostering a culture of transparency, and ensuring that **all employees can advance based on merit and equal opportunity**. Building on its current 48% female representation, Circularise is committed to maintaining balanced representation in its overall workforce. Recruitment process will prioritise blind and merit-based selection following diverse candidate sourcing. While improving gender balance across all levels, the company emphasises inclusivity for all genders in equality initiatives, ensuring that efforts toward gender balance remain holistic and equitable.

2. **Promote gender-balanced leadership and decision-making**

The second priority focuses on leadership representation and decision-making power, aiming to increase the participation of all qualified individuals in senior and strategic roles. Circularise understands that **leadership diversity directly influences organizational performance, creativity, and resilience**. By bringing different perspectives to the table, the company enhances its ability to design technologies and systems that are inclusive and reflective of a diverse global society. Circularise will hence aim to remove all bias from the hiring process and solely hire based on merit.

3. **Ensure pay equity and transparency**

A third strategic objective concerns pay equity and financial transparency, reinforcing the principle that **equal work must receive equal pay**. Beyond gender, this commitment includes monitoring and addressing possible pay disparities based on any form of discrimination. As in strategic value chains, transparency fosters trust and accountability, meaning that every employee, can track and verify data, feeling valued and fairly rewarded within the organization. Therefore, Circularise will aim to have pay parity by 2027.

4. **Support work-life balance and inclusive culture**

A fourth objective emphasizes inclusive organizational culture and work-life balance. Circularise strives to create an environment where flexible working arrangements, remote working, parental and caregiving leave, and wellbeing initiatives are accessible and equally encouraged for all employees, regardless of gender or family status. The company recognizes that equitable access to **flexibility** is a precondition for genuine inclusion and helps dismantle long-standing biases about gendered roles in caregiving. Circularise encourages equal engagement of men in flexibility and caregiving policies, reinforcing shared responsibility and preventing gender imbalances in work-life participation. Besides implementation, the company will actively monitor flexibility of its work and leave policies accessible to the whole community.

5. **Prevent and address harassment and discrimination**

Another strategic pillar of the plan is the prevention of harassment, discrimination, and unconscious bias. Circularise is committed to maintaining a workplace where every individual feels safe, respected, and empowered to speak up. The company adopts a **zero-tolerance approach toward all forms of harassment**, whether based on gender, ethnicity, sexual orientation, religion or cultural background. A confidential advisor has been appointed to develop an anonymous reporting mechanism to facilitate safe and accessible reports. Furthermore, mandatory training on the topic will be implemented as of 2026, to ensure lasting awareness and accountability across the organization.

05

Actions & Measures for Implementation

To translate these strategic priorities into concrete progress, Circularise adopts a comprehensive set of actions that address the structural, cultural, and behavioral dimensions of inequality. These actions are designed to maintain a systemic organizational environment, supported by measurable outcomes, regular monitoring, and transparent communication.

Recruitment, retention and promotion

The implementation of the GEP begins with an inclusive recruitment strategy aimed at expanding the diversity of applicant pools. Job advertisements are written in gender-neutral and culturally sensitive language, recruitment panels are balanced and trained to mitigate unconscious bias. According to recent data by the World Bank, women represent less than a third of the world's workforce in technology-related fields. To set a positive example and to robustly support all in tech, Circularise has successfully collaborated with recruitment agencies that specialize in diverse talent. Furthermore, the company commits to explore mentorship collaborations with educational institutions, to encourage the continuity of academic digital qualifications for all young people in pursuing careers in innovative companies.

Once talent joins the company, career progression and retention become central pillars of equality. Circularise is implementing structured development plans to ensure transparent pathways for advancement, offering annual professional training. Leadership and management training include modules on inclusive leadership, cultural intelligence, and bias recognition, ensuring that all leaders are equipped to manage diverse teams effectively. Evaluation criteria for promotion and performance reviews are standardized to prevent subjective bias, and progress is regularly assessed through disaggregated data on promotions and pay.

Pay Equity & Transparency

Circularise's commitment to equal pay and financial transparency is operationalized through annual pay audits. Circularise uses a specific benchmarking software that is targeted at achieving pay equity that excludes identity information during the calculation process and provides the perfect amount of pay per person to achieve parity. By addressing pay gaps proactively, Circularise reinforces its identity as a responsible and fair employer that values every contribution equally. In case any unjustified discrepancy should be identified, the company is committed to overcome any of such imbalance.

Work-life Balance & Organizational Culture

Circularise recognises that the wellbeing of its employees is essential to sustaining innovation, creativity, and long-term organisational success. A healthy work-life balance fosters mutual respect, productivity, and understanding across cultural and personal backgrounds, contributing to a more inclusive and cohesive company culture. To support this, Circularise will implement yearly awareness campaigns, online training sessions, and interactive workshops that promote mental health, cross-cultural understanding, and inclusive teamwork. These initiatives will help the entire community to develop empathy, strengthen communication, and cultivate a workplace grounded in trust and balance.

The company's work-life balance framework is designed to ensure that flexibility is both accessible and equitable. Clear and transparent guidelines, aligning with national labour legislation of Circularise's offices, will define the terms for remote work, flexible schedules, and hybrid arrangements. Flexibility will be managed on the basis of total working hours per week, allowing employees to adapt their schedules to personal or family needs while maintaining consistency and productivity.

Given that the majority of Circularise's staff are engineers, remote work has proven particularly effective in maintaining performance and work satisfaction. This model will continue to be encouraged, accompanied by tools and practices that sustain team cohesion and collaboration in virtual environments.

In regard to parental and caregiving leave, the company ensures full compliance with national laws and actively encourages all employees - regardless of gender - to make use of available leave entitlements. Promoting uptake of parental leave for all helps support shared caregiving responsibilities, contributing to a more equitable distribution of work and family life. Circularise also supports flexible return-to-work arrangements for parents and caregivers, including phased reintegration and workload adjustments, ensuring that no employee is disadvantaged due to family commitments.

Moreover, the company recognises the importance of a positive, welcoming office atmosphere and will continue to explore initiatives that contribute to employee wellbeing and social cohesion, such as creating comfortable common areas, hosting family-friendly events, and allowing pets in the workplace where appropriate and feasible.

Harassment & Discrimination

Circularise maintains a **zero-tolerance policy** toward all forms of harassment, discrimination, and intimidation, recognising that a safe and respectful work environment is essential to individual wellbeing and collective productivity. The company defines harassment in broad and inclusive terms, encompassing verbal, physical, psychological, and digital behaviours that create a hostile, humiliating, or offensive work climate. This includes, but is not limited to, sexual harassment, moral or psychological harassment, bullying, exclusion, and discrimination based on gender, ethnicity, nationality, age, disability, religion, sexual orientation, or any other personal characteristic protected under national and European law.

Circularise's approach to harassment prevention and response is grounded in clarity, accessibility, and protection. Every employee has the right to work in an atmosphere of mutual respect and professional integrity. To safeguard this right, the company ensures that **clear policies and procedures** are in place for identifying, reporting, and addressing inappropriate behaviour. A confidential and independent reporting mechanism is available to all employees, supported by a trained and impartial "trusted person" within the organisation. This person acts as a first point of contact for anyone who experiences or witnesses harassment or discrimination, offering guidance, support, and confidentiality throughout the reporting process.

All complaints are treated seriously, promptly, and with full respect for privacy and due process. Circularise strictly prohibits any form of retaliation against individuals who report incidents or participate in investigations. The company guarantees that both complainants and witnesses are protected from victimisation, ensuring that reporting is safe and supported at every step. Where necessary, external mediation or investigation may be engaged to ensure impartiality and fairness in the resolution process.

In parallel with these protective mechanisms, the company prioritises prevention through education and awareness. A comprehensive **mandatory training on harassment prevention**, respectful communication, and active bystander intervention will be introduced as part of the onboarding process for all new employees. This training will also be made available to contractors, freelancers, and other members of the Circularise community who collaborate closely with the company, ensuring a consistent culture of respect across all professional relationships.

The training programme will cover the recognition of inappropriate behaviours, the responsibilities of both employees and managers in preventing misconduct, and clear explanations of internal procedures for seeking support or reporting concerns. Completion of the training will grant participants an official certificate of compliance with recognised standards for workplace equality and anti-harassment education (reference to be determined according to the training provider or certification body).

Leadership & Decision-Making

Gender balance and intersectional inclusion at senior levels are not only ethical imperatives but also strategic assets that enhance governance quality, creativity, and competitiveness. Research consistently shows that organisations with gender-diverse leadership teams demonstrate improved decision-making, stronger financial performance, and greater adaptability in times of change.

Circularise's leadership strategy is guided by the principle that diverse perspectives drive better outcomes. To achieve genuine gender balance, the company commits to adopting a formal policy of equality in leadership and decision-making bodies, striving for balanced representation in management, project leadership, and governance committees based on merit. Representation will take into account cultural and ethnic diversity to reflect the company's global footprint.

To support the advancement of underrepresented groups into leadership positions, Circularise will support dedicated training for mid-career employees. These programmes will combine different components of the following: mentorship from senior executives with professional development modules focused on leadership skills, negotiation, public speaking, and strategic management. The company will also encourage participation in external initiatives and events dedicated to underrepresented groups in technology and innovation to foster visibility, networking, and career growth.

Circularise recognises that leadership diversity cannot be achieved without addressing the systemic barriers that prevent equal participation, particularly the care and part-time employment gaps that disproportionately affect underrepresented groups. In fostering inclusive leadership, the company acknowledges the importance of supporting all in taking on caregiving and flexible work roles, ensuring that equality initiatives empower all employees equally. Circularise is committed to close the gap through flexible working arrangements, including options for remote work, flexible hours, and part-time roles that do not penalise employees' career advancement.

Protections against discrimination for pregnant employees, parents returning from leave, or staff with caregiving duties will be explicitly included in HR policies through respective trainings on rights and best practices. To promote shared responsibility, Circularise will also launch awareness campaigns encouraging men's equal uptake of parental and caregiving leave.

In parallel, the company will invest in reskilling and upskilling initiatives for all employees, particularly in emerging digital and green technology fields. By leveraging programmes such as EU Code Week and Horizon Europe's digital innovation initiatives, Circularise seeks to break sectoral segregation and empower all with the technical competencies needed to lead the green and digital transitions.

Circularise views leadership development as an evolving process rather than a fixed goal. The company's management team is committed to continuous reflection and self-assessment, regularly reviewing its progress toward gender and diversity objectives and integrating feedback from employees. Through leadership exemplarity, open dialogue, and accountability, the company aims to set a new standard for what sustainable and inclusive corporate governance can look like in the circular economy and technology sectors.

Circularise's Gender Equality Plan represents far more than compliance, it is a living expression of the company's values. Leadership and equality are embedded into the organisation's DNA, influencing every decision, partnership, and innovation. Through transparency, participation, and consistent action, Circularise strives to build a workplace that mirrors the inclusive, equitable, and sustainable world it envisions through its technologies.

06

Governance, Roles & Responsibilities

To guarantee the implementation of this plan, Circularise commits to the inclusion of different roles and responsibilities among its organization.

Circularise co-founders, Jordi de Vos and Mesbah Sabur, endorse this plan by actively overseeing and sharing it with the company supervisory board and managerial line.

To ensure its full functionality and periodic check, the Head of People will assume the role of Gender Equality Officer (GEO), coordinating with the entirety of Circularise's community, including freelancers and external consultants, promoting and ensuring the application of the plan, its related training and subsequent reporting. To support the GEO, a GEP Steering Committee composed of Circularise's People team and voluntary representatives, will meet on a bi-annual basis, to align with the quarterly strategy sessions, review progress and ensure continued visibility on the agenda.

Every staff member will then be responsible for upholding the gender equality principles enshrined in the present GEP.

07

Communication

Circularise GEP will be officially launched on the 1st of January 2026, where it will be announced from its founders to all employees. On the same day, the plan will be permanently uploaded on www.circularise.com. The midterm report on actualisation of this GEP will be shared within Circularise community. The principles envisioned in the present plan and affiliated training will be permanently available for every person within Circularise at any time, in any location.

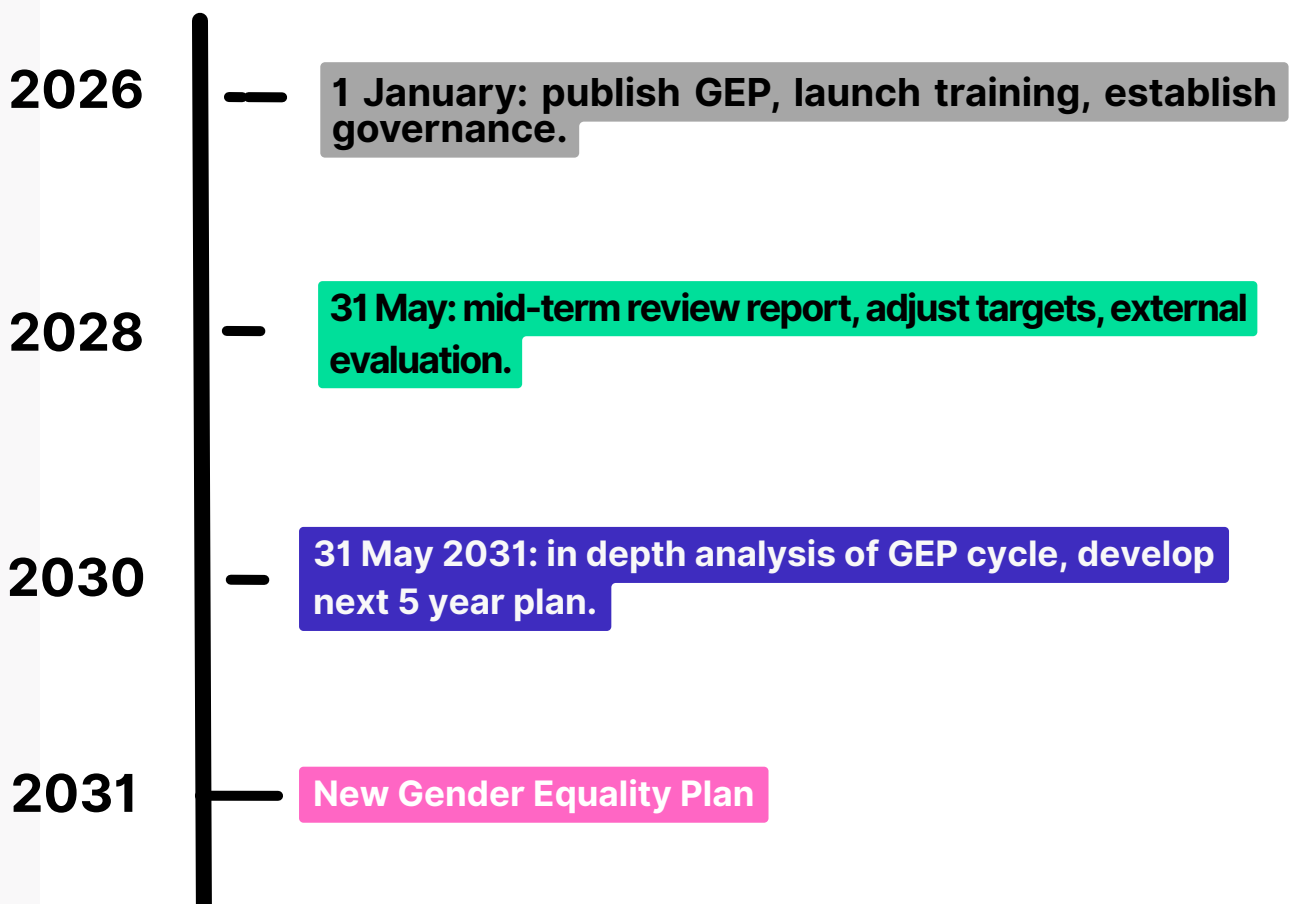
08

Evaluation & Review

To ensure effective monitoring and continuous improvement, the implementation of the GEP will be regularly reviewed and evaluated. A comprehensive review will take place after two and a half years, resulting in a summary report that assesses progress, updates targets where necessary, and is shared internally across the company.

A new GEP will be adopted by January 2031, building on the insights and outcomes of the current plan.

Circularise will maintain a continuous feedback loop through employee surveys and staff consultations to capture ongoing input and ensure the plan remains relevant and responsive. In addition, the GEP Steering Committee will convene on a bi-annual basis to review progress and discuss key actions and priorities



This Gender Equality Plan has been formally endorsed by Circularise's executive leadership and reflects the company's collective commitment to equality, inclusion, and transparency.

Together, we commit to translating these principles into daily action, ensuring that Circularise remains a place where every person can thrive and lead.

Signed in The Hague, November 2025

Jordi de Vos



Mesbah Sabur



WWW.CIRCULARISE.COM