GAIA Circulair – Policy Document (Draft)

Introduction

GAIA Circulair helps companies and organizations reuse materials and raw materials. We do this through practical solutions: collecting products, disassembling them, and ensuring materials are reused or recycled.

Mission

Our goal is to create circular, sustainable systems. In doing so, we contribute to the preservation of raw materials—the essence of a circular economy.

Vision

Products should be designed so that reuse, repair, and recycling are self-evident. We see reverse logistics as a crucial link to enable better next-use applications for materials. The GAIA loop primarily focuses on textiles and personal protective equipment (PPE), but the concept can be applied to any type of product: a blueprint for a circular future. We are already putting it into practice today.



Purpose of this document:

This document describes our policies and concrete actions in the areas of sustainability, circularity, corporate social responsibility, ethics, and sustainable procurement.

Scope:

This policy applies to all activities of GAIA Circulair and also covers collaborations with our partners.

Environmental Policy

Strong environmental policy is an extension of circularity. For GAIA Circulair, the responsible use of materials and the preservation of the value and quality of raw materials form the foundation of sustainability. We strive for maximum reusability of materials and minimize waste at every link in our chain. In practice, incineration of materials still occurs when a better end-of-life solution is not possible, often due to linear rather than circular design.

GAIA Circulair is **VIHB-registered** in the Netherlands, meaning we are authorized to transport materials that are normally considered waste. Additionally, we are certified for waste transport in Flanders, Wallonia, and Brussels. For all regions where we provide our services, we ensure we have the necessary logistics permits, allowing us to guarantee sustainable cross-border material management.

To make our sustainability efforts transparent, GAIA Circulair is **registered with EcoVadis**. This international assessment organization evaluates companies on environmental impact, labor and human rights, ethics, and sustainable procurement. We continue to work on improvements within this framework and aim to achieve the highest possible score.

While certifications such as **ISO 14001** (environmental management) provide common guidelines, GAIA Circulair has consciously chosen not to formalize these. Many of the principles prescribed by these standards—such as continuous improvement, risk management, and transparent processes—are already integral and verifiable parts of our operations.

Our environmental policy therefore focuses on **practical, measurable impact** rather than paperwork. By doing what works—smart material management, providing insight into material flows, and structurally contributing to circularity—we make a concrete contribution to the transition toward a circular economy.

The Importance of Circularity in design, production and the Chain

For circularity to work, all actors in a loop must understand the principles and take action. It all starts with design: products must be composed so that raw materials do not contain hazardous materials or substances of concern, are easy to disassemble, and allow for logical reuse, repair, and recycling.

But that's not all. Without an underlying reverse logistics system, products designed for circularity still lose their value. For some material streams, collective systems are in place, but specific product groups often require tailored reverse logistics solutions. This is where

GAIA Circulair focuses its energy: **collecting products and finding new destinations for them—whether as products, components, or raw materials for new products.** This is necessary because standard logistics processes are not designed for reverse logistics. Many logistics service providers also find it difficult to transition to circular practices. We provide the solution.

GAIA Circulair operates in a large number of European countries and aligns its environmental objectives with the **European Green Deal** and the **Circular Economy Action Plan**. We focus on three main goals:

1. Waste Prevention and Material Reuse:

Material preservation—and thus waste prevention—are central to our mission. Through separate collection and reuse of textiles and footwear, we contribute to the **Extended Producer Responsibility (EPR)** obligations for these product categories in Europe. GAIA Circulair aims to make transparent what percentage of collected shoes and textiles are actually reused as products or raw materials. This data is included in our online dashboard, where customers have real-time insight into the yields and environmental benefits of their material streams. Dashboard data can also be downloaded as input for reports.

2. Avoiding CO_2 emissions:

Our activities help avoid emissions by extending the lifespan of products and maximizing reuse. The greatest impact lies in reducing primary raw material extraction and production—processes that typically emit the most CO_2. In the coming years, GAIA Circulair will formulate its own targets based on measured material flows and transport movements.

3. Energy Consumption:

In line with the European target of sourcing at least **42.5% of energy from renewable sources by 2030**, GAIA Circulair aims to gradually make its own energy consumption more sustainable. This is achieved through energy-efficient operations, sustainable mobility, and selecting partners who also use green energy.

With this approach, GAIA Circulair not only helps its customers comply with European EPR regulations but also makes a demonstrable contribution to the goal of recycling **at least 55% of municipal waste by 2030** and reducing CO_2 emissions by **at least 55% compared to 1990 levels**.

Actions

Collection with the Resource Box

Our customers collect used materials in the **Resource Box** provided by GAIA Circulair. These boxes are designed to make collection easy: products do not need to be pre-sorted. Once the box is full, the customer reports this via the **online portal**, after which we organize the reverse logistics.

We confirm the pickup date, send a reminder on the day itself, and immediately deliver **new empty boxes**. This ensures uninterrupted collection, allowing customers to continue contributing to their circular goals without additional effort.

The Resource Box prevents the transport of empty space, creating a positive impact on both costs and environmental footprint.

Sorting and Material Registration

Back in our warehouse, the collected products are carefully **sorted by type, material, and color**. Through our online portal, customers gain immediate insight into the **positive environmental impact** of their participation—aligned with the **United Nations Sustainable Development Goals (SDGs)**.

The sorted textiles are then **pressed into bales**. Each bale receives a **Digital Product Passport** (C_passport®, developed in collaboration with Cirmar), which records the composition, origin, and destination of the material. The bales are then made available on a digital marketplace. The process is fully automated, with other relevant data also linked, ensuring that producer organizations are fed with the data relevant to them. This guarantees full transparency in the material flow and enables traceability for reuse and recycling.

Textile Processing and Fiber Reuse

For workwear, safety clothing, and textiles, we distinguish between product reuse, component reuse, fiber-to-fiber recycling, and recycling into other products.

- If clothing is still suitable for reuse, it is inspected and reused.
- Component reuse occurs when products that are no longer suitable for reuse still contain components that can be applied in new, different products. In this context, we collaborate with **Pōur Product** (www.pourproduct.com).
- For recycling, we remove logos and non-recyclable substances in collaboration with specialized partners (such as **Stichting Mazzel**), after which the **fibre is opened** by specialized partners in the Netherlands, Germany, and Belgium.
- The fibers are then processed into new yarns, tailored to the specifications of our partners and end customers. GAIA Circulair is also involved in several projects where, after yarn-to-yarn recycling, new products are made on an industrial scale. This closes the loop—from workplace back to raw material.

Safety Footwear

Safety footwear is designed to last a long time and remain intact under the harshest conditions. This primary goal can conflict with the principle of designing a product so that it can be disassembled after use. This means we must dismantle the footwear to reuse the materials. Step by step, we are working on technologies to dismantle safety footwear in such a way that we can recover more materials and raw materials, while also ensuring that no disruptive substances are processed into new products. The purity and applicability of recovered materials are crucial. We are actively developing, together with our partners and based on ten years of development and testing, a complete shoe recycling facility. This facility is expected to be fully operational by **2028**, producing recovered materials.

Dismantling of other Personal Protection Equipment (PPE)

Other PPE items, such as helmets and goggles, are also designed to last—sturdy, safe, but therefore difficult to recycle. GAIA Circulair ensures these products are **manually dismantled**, in collaboration with **social employment partners** (such as Stichting Mazzel).

This collaboration creates employment opportunities for people at a distance from the labor market **and** makes it possible to separate different material streams (metal, textile, plastics, rubber) for further processing.

Circular Products

The raw materials we collect are given a **new purpose** in a wide range of applications: from new (safety) clothing to bags, sheet materials, and interior and automotive upholstery.

Examples
Recently, an innovation project was completed in which **plastic from PPE helmets** was converted into regrind and then into new plastic products, which are now being offered to customers.

We also launched the **'Work Again' socks**: circular work socks made from **20% fibers sourced from collected B2B workwear**. This product symbolizes our mission and serves as a communication tool and proof of closed loops. The process—mechanical recycling—and the specifications of the recovered material (e.g., fiber length and tensile strength of the yarns) currently allow us to incorporate only 20% recycled content in the socks, taking into account the quality requirements for **work socks**. In the future, this process will be combined with chemical recycling, which could increase the percentage. At the same time, if we were to add 20% recycled content to all new socks, many more used socks would need to be offered to our reverse logistics system.

We are also launching a platform on our website where circular products from GAIA **and** our partners will be offered. All these products will be provided with a **Digital Product Passport (C_passport®)** from Cirmar, allowing us to share information on material composition, impact data, and end-of-life information.

Waste Management and Energy Consumption

Not all collected materials are directly recyclable. We advise our customers to process these residual streams internally through their regular waste management. In some cases, we still accept these streams to explore further processing options—always with **clear communication** about what is and is not possible.

In our own operations, we consciously choose **energy-efficient and sustainable alternatives**—whether for transport, lighting, ICT systems, or partnerships. For the residual streams of our customers that we process, we clearly show in their dashboard the impact of collection and the incineration or recycling of the products.

By continuously improving and making conscious choices, we step by step reduce our ecological footprint.

Innovation and Future-Oriented Design

Innovation drives our circular development. We actively participate in pilot projects and collaborations focused on circular product design, traceability, and material innovation. New insights from these projects are integrated into our processes, bringing us ever closer to fully closed or connected supply cycles.

As a partner in reverse logistics, we have frequent contact with producers. We encourage them to reuse products and produce differently, for example by exploring the possibilities of circularity in pilot projects. We also actively think about opportunities for other material streams with our customers. Together with our partner **Agricon Nederland**, we provide additional services and find the best possible end-of-use solutions.

Labor and Human Right

Code of Conduct for Employees

GAIA Circulair maintains a clear code of conduct in which respect, integrity, and professionalism are central. All employees are expected to treat each other with dignity and uphold the core values of our company in their daily work.

Equal Opportunities, Diversity, and Inclusion Policy

We provide equal opportunities to everyone, regardless of age, gender, background, religion, sexual orientation, or disability. Diversity is actively promoted, and inclusion is an integral part of our operations. By collaborating with **Stichting Mazzel**, we also structurally provide workplaces for people who would normally be at a distance from the labor market. We do this because they have just as much right to a pleasant workplace and, like every other employee, are of great value to our company.

Safety Policy (Occupational Health and Safety, ARBO)

GAIA Circulair complies with all legal requirements regarding working conditions. Our safety policy is aimed at preventing accidents and ensuring a healthy and safe working environment for everyone. We have concluded the necessary contracts and are committed to a safe workplace.

Ethics

Ethics and Corporate Social Responsibility

At GAIA Circulair, we believe that true circularity is not just about materials, but also about **people, values, and fairness**. Sustainable entrepreneurship means taking responsibility—for the impact of our choices, for the way we collaborate, and for the world in which we operate.

Honesty and Transparancy

We act with **openness and integrity**. This means we communicate clearly about what we do, what we (still) cannot do, and what steps we are taking to improve further. In our collaborations with customers, suppliers, and partners, **equality and respect** are central. We only enter into long-term relationships with parties that share our vision of sustainability, safety, and fair business practices.

Transparency is not an afterthought but a prerequisite. Through our **Digital Product Passports** and the GAIA platform, we provide insight into the origin, composition, and destination of materials, as well as the effects of our activities. This makes the circular chain not only more sustainable but also **verifiable and reliable**.

Dignified Work and Inclusion

Circularity offers not only economic and environmental benefits but also social opportunities. GAIA Circulair works with organizations such as **Stichting Mazzel** and **Pōur Product**, which provide a place for people at a distance from the labor market within our processes, for example in the dismantling of PPE or the sorting of textiles.

We believe in a circular economy that works for everyone: one that offers people opportunities, utilizes talent, and contributes to social justice. Our employees and partners are treated fairly, work under safe conditions, and are given room to grow.

Responsible Procurement and Supply Chain Ethics

Our responsibility extends beyond our own organization. We select suppliers and processors based on sustainability, working conditions, and ethical standards. We make conscious choices regarding the products we purchase. For example, we use collection boxes with the **Forest Stewardship Council (FSC)** certification, meaning we use forest products that support responsible forest management.

We expect our supply chain partners to:

- Comply with applicable environmental and safety legislation;
- Ensure fair wages and working conditions;
- Not use child or forced labor; and
- Communicate openly about their own improvement trajectories.

This is how we build a responsible and reliable value supply cycle together.

Integrity and Compliance

GAIA Circulair tolerates no form of fraud, bribery, or conflict of interest. We have clear internal guidelines for integrity, confidentiality, and data security. Employees are encouraged to discuss ethical dilemmas and report misconduct without fear of adverse consequences.

Compliance with laws and regulations is a given, but we go further: we want to be an example of ethical and future-oriented entrepreneurship in the circular economy.

Partnerships and Supply Cycle Collaboration

Circularity does not arise in isolation. It requires collaboration, trust, and connecting expertise at every link in the chain. GAIA Circulair actively builds strong partnerships with organizations that share our vision of sustainability, social responsibility, and supply chain transparency. Together, we turn circular ambitions into practice—from collection to new applications.

Cirmar – Transparancy with Digital Product Passports

For circular products to reach their full potential, it is not only necessary to recover materials but also to digitally and accessibly record information about those materials. That is why GAIA Circulair works closely with **Cirmar**, the developer of digital product passports and circular reporting tools.

Thanks to this collaboration, GAIA Circulair customers gain insight into the impact they make by returning products and giving materials a new destination. For every bale of collected and sorted material, a **digital product passport (C_passport®)** is created, which includes:

- The materials the bale consists of;
- Possible follow-up applications; and
- The environmental impact and CO_2 savings.

Newly produced products commissioned by GAIA Circulair are also provided with a **C_passport®**, so that the next loop is digitally supported and secured for these products as well. This allows the material gains and emission avoidance to be substantiated.

This way, every raw material is not only physically but also digitally preserved, and transparency becomes a powerful tool for sustainable supply cycle management.



Gesorteerd materiaal



Werksokken



Reistas
Pōur Product



Uniform Wall
Agricon Nederland

Agricon Nederland – High Quality Recycling Flows

For the processing of materials into new raw materials, GAIA Circulair collaborates with **Agricon Nederland**. Agricon directs recycling streams within an extensive network of specialized processors and recyclers. Thanks to this collaboration, we can guarantee that the collected materials are reused in the highest quality way possible.

The goal is always to maximize the circular potential of raw materials—while preserving quality, value, and origin information. This means we proactively think about opportunities for other products and material streams. Where our customers want to seize these opportunities, we provide additional services.

Stichting Mazzel – Social Entrepreneurship in Practice

An important part of our mission is creating societal added value. Together with **Stichting Mazzel**, we create employment for people at a distance from the labor market. They play a valuable role in our operations, including in the dismantling of PPE and the sorting of textile streams.

This is how we connect sustainability with inclusivity: materials get a second life, and people get new opportunities to participate in the circular economy.

CCT – Chain Collaboration in Textiles

GAIA Circulair works as a logistics partner with **Circular Clothing Textiles (CCT)**—a collaboration in which our partner **Cibutex** also participates—which focuses on bringing together the entire chain, from fiber to fiber. With these partners, we develop solutions that go beyond recycling alone: a joint concept for producers consisting of design strategies, traceability, and new uses for recycled fibers.

Together, Cibutex and CCT create a strong connection between producers, collectors, processors, and buyers—the foundation for a truly circular textile chain.

Pōur Product – Redesign the Existing

We prefer to process the materials we collect into new products. That is why we work with **Pōur Product**, where recovered raw materials are used for, among other things, travel, laptop, and toilet bags. The designs of these products retain the connection with the previous application of the material. Worn workwear is used in Pōur Product's local, social workshops as a basis for functional products with a unique story.

Stronger Together

The strength of GAIA Circulair lies in collaboration. By pooling knowledge and capacity with partners such as **Cirmar, Agricon Nederland, Stichting Mazzel, Pōur, and CCT**, we achieve real system change—we are the connecting factor. These partnerships enable us to translate circular principles into concrete results—in materials, in human capital, and in societal impact.

Looking Ahead

Circularity is not an endpoint but an ongoing process of learning, improving, and innovating. At GAIA Circulair, we look ahead—to a future in which materials, raw materials, knowledge, and collaboration increasingly gain value. We want to show what happens in the loop, where materials go, and how we, together with our partners, increase our impact.

Transparancy and Data Driven Insight

We already record a lot of data about collection, sorting, and material processing. This data forms the basis for the next step: transparent reports that give our customers and partners insight into the entire chain. This allows us to show what is reused, recycled, or incinerated, and what environmental benefits this yields.

By making this information available in our online portal and via digital product passports, we not only provide accountability but also direction. Data thus becomes a tool for improvement—for GAIA Circulair itself, but also for our customers, producers, and processors.

Our ambition aligns with European obligations regarding transparency, reporting, and **Extended Producer Responsibility (EPR)**. By measuring and making things visible, we help companies not only meet these requirements but also perform better than the standard.

Closing Loops Together

The future of circularity requires collaboration that goes beyond contracts alone. We want to work more actively with producers to design products that are easier to disassemble, sort, and recycle.

From our role in reverse logistics, we connect collection with reprocessing, thereby strengthening collaboration between buyers, producers, and recyclers. Our goal is a complete material loop, where every party benefits from the information and experience we build together.

At the same time, we face reality: not all textiles can be recycled fiber-to-fiber, and chemical recycling is still in its infancy. That is why we look for other sustainable solutions in the form of certified products, such as sheet materials.

For the recycling of footwear, we are setting up a complete line for the B2B market together with partners. Once this is successfully established and operational, we may expand the concept to the B2C market.

Mobilising Knowledge and Stimulating Innovation

The knowledge GAIA Circulair gains in practice is valuable for the entire chain. That is why we are committed to actively sharing and utilizing this knowledge—to produce more intelligently, recycle better, and enable more reuse.

We do this by:

- Sharing our knowledge and data with customers and chain partners;
- Participating in innovation projects within the circular economy; and
- Collaborating with education and research to develop new solutions.

This is how GAIA Circulair grows into more than just a link in the chain: a catalyst for knowledge and progress.

Our Ambition

In the coming years, we want to further strengthen our position in Europe as a reliable partner in circular reverse logistics and chain transparency. By continuously measuring, learning, and improving, we are step by step building a future where waste belongs to the past. We do this by connecting more customers and, by working more efficiently, reducing our logistical impact. We are not only doing this in the Netherlands and its surrounding countries; **GAIA Nordics** and **GAIA Circulair Alps** are already active as well.

We look ahead—with confidence, with partners, and with the conviction that circularity only truly works when everyone in the supply cycle moves along.