

Corporate Social Responsibility & Ethical Policy.

Total Recycling Services Limited seeks to be a good corporate citizen in everything that it does. We have therefore determined to bring together our existing operating principles into one framework policy under the heading of Corporate Social Responsibility. The principles encompassed in this policy cover all areas of the Group's operations and have been developed and continue to be reviewed against and updated by reference to relevant codes of corporate governance and international standards including the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, the Guidelines for Multinational Enterprises established by the Organisation for Economic Cooperation and Development (OECD), the Rio Declaration on Environment and Development and the UN Convention against Corruption.

The Managing Director supports the principles set out in those codes and standards and the aim of this policy is to translate that support into a set of guidelines and standards that set a common approach for the Company and provides practical guidance for our managers and employees on the ground.

Compliance, Monitoring and Reporting

We recognise that our social, economic, ethical and environmental responsibilities to our stakeholders **(customers, employees, regulators, investors, suppliers, the community and the environment)** are integral to our business and its' success. We believe in being fair, open and honest.

Compliance with this policy will be continuously monitored and subject to review by the Board of the Company.

Each department manager is responsible for ensuring that the principles set out in this policy are communicated to, understood and observed by all employees and for ensuring compliance in their area of responsibility.

Employees and workers who reasonably suspect that there has been a breach of this policy must report it to their line manager, senior management, or other mechanisms established by the Group to report such breaches. We recognise that employees may be reluctant to report concerns for fear of retaliation and will take disciplinary action against any employee who threatens or engages in retaliation, retribution or harassment of any person who has reported or is considering reporting a concern in good faith.

The Managing Director will not criticise management for any loss of business resulting from adherence to the principles set out in this policy. All sections of this policy are underpinned by the Group's Code of Business Ethics, which is set out in Section 1.

The other areas covered by this policy are:

- Safety and Security,
- Employment,
- Customer and Community and
- Environment.

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CODE OF BUSINESS ETHICS

This code applies to all of the operations of the Company and sets out the minimum standards which the Company expects from staff in their internal and external dealings with colleagues, customers, stakeholders and third parties.

Basic Standards of Conduct

- We will conduct every aspect of our business with honesty, integrity and openness, respecting human rights and the interests of our employees, customers and third parties.
- We will respect the legitimate interests of third parties with whom we have dealings in the course of our business.
- We will maintain the highest standards of integrity – for example, we will not promise more than we can reasonably deliver or make commitments we cannot or do not intend to keep.

Employer

Total Recycling Services Limited

- Is committed to creating and maintaining a safe and healthy working environment for its employees.
- Will strive to create a workplace in which there is mutual trust and respect and where every person feels responsible for the performance and reputation of our company.
- Will respect the individual and each other's rights, customs and traditions including the right to freedom of association and the right to decide whether or not to join a trade union and will negotiate in good faith with the properly elected representatives of its employees.
- Will work towards achieving a diverse workforce, recruiting, employing and promoting employees only on the basis of objective criteria and the qualifications and abilities needed for the job to be performed.
- Will maintain good communications with employees through our information and consultation procedures.
- Will assist employees in realising their potential.

Customers

- The Company is committed to providing safe, value for money, high quality, consistent, accessible and reliable services to its customers.
- We are committed to working with our customers to improve social and environmental performance and to achieve best value - value for money.

Shareholders

- The Company will conduct its operations in accordance with the principles of good corporate governance.
- We will provide timely, regular and reliable information on the business to our shareholders.

Business Partners and Stakeholders

- We aim to develop strong relationships with our suppliers, stakeholders and others with whom we have dealings, based on mutual trust, understanding and respect.
- In those dealings, we expect our partners to adhere to business principles consistent with our own.
- The Company will conduct its operations in accordance with the principles of fair competition and all applicable regulations.
- We support the welfare and rights of our own employees and encourage our suppliers to do likewise. Our approved supplier process ensures that we evaluate contractors and suppliers of products and services so that we can control who we work with. Where we discover that they are not adopting a corporate socially responsible attitude, adopting responsible business policies and

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practices, are considered to be using unfair business practices or are blatantly polluting the environment, we will cease trading with them.

- Anyone who has authority to purchase, works closely with our suppliers to ensure that we purchase the best environmental options available. We also consider end-of-life and life-cycle of materials and products with view to them having a long life and being recyclable when no longer effective.

Compliance with Law

All members of the Company will comply with the laws and regulations applicable wherever they do business. Appropriate training will be provided for employees as necessary.

Business Integrity

- The Company shall not offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain and no employee may offer, give, seek or receive any gift or payment which is, or could be construed as, such. If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with his or her manager.
- The Company's accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.
- No undisclosed or unrecorded account, fund or asset will be established or maintained
- The Company will not facilitate, support, tolerate or condone any form of money laundering.

The Environment

- Total Recycling Services Limited is committed to making continuous improvement in the management of its environmental impact and has a comprehensive environmental management system, environmental policy and procedures which are registered and comply with BSEN ISO14001.
- We conserve energy, water, paper and other resources, particularly those which are scarce or non-renewable. Energy and fuel consumption associated with infrastructure are our greatest environmental aspect and our largest expenditure. As such, we are constantly reviewing it and implementing measures to reduce consumption. Where possible, we use raw materials from recycled and always ethical source. We also evaluate our supplier chain with regards to their corporate and social responsibilities with raw materials and fabricated goods. We recognise that transport associated with purchased goods and our own transport function adds to carbon footprint. We promote the use of local supply but where we need to use suppliers, treatment and transfer stations that are not local, we will use techniques to safely bulk, collate, bale and arrange deliveries and collections to minimise repetitive or 'one-way' journeys. This also ensures that we maximise the socio-economic and environmental benefits of goods and services purchased.
- Our management programme will check noise emissions applicable, are within statutory requirements. We then monitor them to ensure that they do not increase above permissible levels or to cause nuisance.
- We aim for sustainable development through re-use, recycling and reclamation and extend this to materials and goods via the supply chain. We recycle and re-use products wherever possible. We have recycling avenues for wastes and by-products from our operations and activities including those for maintenance and servicing of plant and vehicles. We also buy recycled products and those which are the best environmental option
- We minimise releases of greenhouse gases, volatile organic compounds and other substances with the potential to do damage to health and the environment. Having phased out ozone – depleting products, we no longer purchase or use ozone-depleting products.

Community Involvement

The Company strives to be a good corporate citizen and to fulfil its responsibilities to the societies and communities in which we operate.

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Conflicts of Interest and Confidentiality

- Whilst the Company respects the privacy of its employees, all employees are expected to avoid personal activities and financial interests, which could conflict with their responsibilities to the business.
- The Company employees and workers must not seek gain for themselves or others through misuse of their positions or company property.
- All actual and potential conflicts (including those arising from the activities or interests of close relatives or partners) should be disclosed to and discussed with an employee's line manager.
- Information received by anyone in the course of his or her employment must not be used for personal gain or for any purpose other than that for which it was given.
- Where information is confidential, that confidentiality must be respected.

SAFETY AND SECURITY

Safety

- The Company is committed to making continuous improvement in the management of its health and Safety and has a comprehensive occupational health and safety management system, occupational health and safety policy and procedures.
- Our management programme will check noise emissions, discharges and emissions against applicable statutory requirements and to existing permits and consent parameters. We monitor them to ensure that they do not increase above permissible levels or to cause nuisance.

Security

- Security is a key issue for our staff and our business. We recognise the range of security issues which can arise.
- The Managing Director is committed to ensuring, so far as is reasonably practicable, the security of customers using our services, our employees at work and our property.
- The threats to security are wide ranging, significant and, in the main, driven by external influences. The ability to control risks varies. However, we have the ability to address or mitigate all of the threats which apply. To be successful in this we need the co-operation and engagement of all of our staff and customers.
- Security is an area in which we seek continuous development and improvement and compliance with existing and emerging legislation. We will heighten the profile of security to ensure all members of staff understand why they should and how they can play their part. We will also work on ways to involve customers. Our efforts will bring greater personal and corporate security and business benefit.
- This statement provides guidance and direction to all employees on what is both required and expected of them. We are confident our staff will appreciate the reasons for this and the benefits to them, their colleagues, our customers and our property.
- We aim to achieve, so far as is reasonably practicable:-
 - A secure environment for customers using our services
 - A secure environment for staff in their work
 - Security of our property
 - Security of our systems and processes
- We will develop systems to monitor our performance on security within our operations. All operations will be subject to periodic inspection and review.

We also require contractors to comply with this policy whilst they are working at our premises.

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In formulating its employment policies, the Company is guided by the framework established by the Organisation for Economic Co-operation and Development (OECD) in its Guidelines for Multinational Enterprises. These guidelines encourage companies to foster openness, sustainability and respect for employee rights. Our employment policies cover all employees of the Company.

Equal Opportunities and Diversity Policy

- We operate an equal opportunities policy for all present and potential future employees. There are safeguards in place to ensure that all employees are treated with respect and without sexual, physical or mental harassment. We operate an 'open door' policy of access to all of our top management.
- Wages and salaries are paid at market rates and in accordance with prevailing legislation. Employee working hours are also compliant with the prevailing legislation with breaks away from the workplace enforced. Overtime is voluntary and is allocated on an equitable basis.
- The Managing Director is committed to equality of opportunity as an employer. The Company is committed to treat equally and with fairness at all times its employees, workers, customers, contractors and those who come into contact with the Company.
- We are committed to seeking continuous improvement and compliance with legislation based on the following principles. Everyone has the right to be treated with dignity and respect. We will not discriminate on the grounds of race, gender, disability, nationality, religion, philosophical belief, political belief, age, sexual orientation, family status, trade union activity or any other factor. We will adopt fair and inclusive practices throughout our operations and will seek to eliminate all prejudice, discrimination, bullying and harassment. All employees and workers have a personal responsibility for the practical application of the Equality and Equal opportunity policy in their day-to-day activities and must support the policies at all times. Non-compliance with those policies will be treated seriously and will not be tolerated.
- The Managing Director is required to ensure:
 - He creates a productive and safe working environment, promoting diversity and inclusion in their workforce;
 - He develop new practices, as appropriate, to ensure all employees, contractors and customers are treated fairly; and
 - He can demonstrate continuous improvement in practices to promote diversity and equal opportunities for all.
- We will comply with and exceed where possible, current national and international legislation and relevant codes of practice in the countries where we operate. We will monitor our compliance with our policies and the requirements of relevant underpinning legislation as appropriate.

Managing Director