

Supplier Code of Conduct



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Introduction

Our mission is to lead the waste and recycling sector by providing innovative solutions that minimise environmental impact, protect communities, and uphold the highest standards of corporate ethics.

Our vision is to create a future where waste is minimised, and our staff and wider communities thrive together, demonstrating that social responsibility and profitability can coexist harmoniously.

Electrical Waste Recycling Group T/A Waste Experts (Waste Experts) is committed to high standards of integrity and sustainability, treating people in the end-to-end value chain with respect and integrity. Waste Experts has a zero-tolerance policy with regards to unethical business behaviour such as bribery, corruption and forced labour. The social, ethical, and environmental footprint of our business cannot be separated from those of our key supplier partners.

At Waste Experts we consider our supplier partners to be an extension of our business and we recognise the important role they play in our mutual success. We want to work together with our supplier partners to build trust and deliver value for all parties. We recognise that, in many cases, a supplier can only be as good as its customer, and Waste Experts want to create a culture of collaboration between, customer, supplier partners and sub-contractors.

Waste Experts requires all suppliers to adopt the values within this code of conduct within their own scope of business and influence.

Overview

This code of conduct is aligned to and supports our wider Sustainability and Social Value Strategy, in which we have identified our strategic goals.

1. Encourage and develop our People

2. Protect the Planet

3. Enhance Communities

4. Work ethically with transparency

Waste Experts will ensure that all its preferred suppliers have the necessary information available to them and it is their responsibility to fully understand the contents of this document and take all necessary actions to achieve compliance, this includes actions by suppliers and subcontractors to ensure their own supply chain behaves in a way that enables them to fully support the principles of this code of conduct.

As a supplier, you must comply with all applicable laws and regulations and your contractual obligations to us, where compliance with local law is more demanding than the standards set out within this Code, then local law will override the code.

If an employee of a supplier partner has a concern that this Code has been breached, they should notify their normal point of contact, or report to a whistleblowing prescribed body such as Protect (See 4.8 Whistleblowing and reporting)

Any breaches of this Code will be formally investigated. If substantiated, failure by any supplier to remedy the non-compliance within an agreed period may result in termination of our relationship with that partner.

1. Encourage and Develop our People

1.1 Health and Safety

Waste Experts take the safety of our employees, customers, suppliers, and subcontractors very seriously, we encourage a culture of safety first, putting welfare above any other gain. All suppliers should provide a safe and healthy workplace for all their employees. Suppliers must provide a Health and Safety Policy to include responsibilities of competent persons within the organisation. Suppliers must ensure all workers are sufficiently aware of risks and appropriately trained on the implementation of control measures.

Waste Experts will not conduct business with any supplier where we consider that working practices endanger the welfare of themselves or others. Suppliers should notify Waste Experts immediately of any know hazards or risks associated with the products or services supplied to us, or our clients, or any sanctions imposed by the Health and Safety Executive.

1.2 Protecting worker's rights and promoting decent work

Waste Experts believe that there are certain worker's rights which are so fundamental that they are beyond reproach. These are set out by the International Labour Organisation's (ILO) Declaration of Fundamental Principles and Rights at work, these include:

- The elimination of all forms of forced and compulsory labour.
- The abolition of child labour.
- The elimination of discriminatory practices in the workplace.
- A safe and healthy working environment.
- Adequate earnings and productive work.
- Decent working time.
- Work-life balance.
- Stability and security of work.

Waste Experts upholds the fundamental human rights of all those who work for or with us and we will not tolerate any abuse of this kind in our supply chain. We expect our supplier partners to commit absolutely to the principles set out above and we have a zero-tolerance policy with regards to any person or business that violates any of the above principles, or other basic human rights or has links to an oppressive regime.

1.3 Diversity, Equity, and Inclusion

Our success depends on our people and the diversity in our workforce. As an equal opportunities' employer, any decisions we make in matters of recruitment, training, pay or promotion are based on the needs of the business and a candidates/employee's aptitude, skill, experience and ability to do that job, we are committed to ensuring all employees have equal opportunities in their employment and we expect our suppliers to take similar steps to protect their own employees from discriminatory practices.

1.4 Harassment

Waste Experts firmly believe that all our employees should enjoy a positive working environment, and everyone is treated with dignity and respect. We do not tolerate any form of abusive behaviour, including intimidation or harassment, whether towards our employees, suppliers, or anyone else. Similarly, we will not accept any of our suppliers conducting themselves in an abusive manner, whether towards our employees, clients or their own employees. Any allegation of abusive behaviour will be fully investigated and may result in termination of the relationship with the supplier.

1.5 Living Wage and Living Hours

As a Living Wage and Living hours employer, Waste Experts expect all of our supply chain to pay their employees in line with the Real Living Wage (as advised by the Living Wage Foundation), with work contracts to ensure that employees have guaranteed minimum hours – or agreed notice periods for changes in hours, with no zero hours contracts, unless such contracts ensure a minimum pay where hours are not available.

1.6 Employer Pays Principle

We expect supplier partners to uphold the same approach to recruitment and employment that they offer direct employees and adopt the "employer pays" principle, this means that no worker should pay for a job and the cost for recruitment should not be borne by the worker, but by the employer.

1.7 Wellbeing

Managing the wellbeing of our employees, contractors and supply chain is a priority. We want to ensure that we have healthy and engaged employees and expect our suppliers to take the same approach, ensuring that wellbeing is a priority for the whole workforce.

2.0 Protect the Planet

2.1 Protection of the Environment

Waste Expert are committed through its activities to minimise any impact on the environment. Suppliers are required to develop and supply goods and services that have limited impact on the environment, reduce the consumption of energy and natural resources.

Suppliers are expected to comply with all applicable environmental laws, with all relevant permits in place for them to lawfully carry out the services supplied. Suppliers should implement practices that improve the impact that their business and/or services have on the environment and local communities. These approaches should include the following:

- **Product life cycle assessments** – suppliers of goods are encouraged to undertake product life cycle assessments (LCAs) for products, prioritising these that will have the biggest impact. In time, there will be an expectation that the environmental footprint of each product will need to be measured and established, this data should be readily available on the products supplied.
- **Energy & Greenhouse Gas (GHG) emissions** – suppliers should measure energy consumption and Scope 1, 2 and 3 emissions and the data should be available to Waste Experts on request. There should be a focus on increasing energy efficiency and use of renewable electricity provision.
- **Material consumption and packaging** – suppliers must undertake all necessary steps to reduce the volume of packaging on goods supplied, with particular emphasis on reduction of plastics, and the use of recycled and recyclable materials.
- **Transport and Logistics** – the use of alternative fuel vehicles should be prioritised where this is feasible, where not available (e.g. HGV's) the use of least polluting engines is encouraged. Suppliers are encouraged to ensure maximum utilisation of vehicles and provide CO2 and mileage data for all services provided to Waste Experts on a quarterly basis. Where suppliers use HGVs for waste services provided, a standard national, or standard international O'License is required, and details of servicing and maintenance to be made available on request.
- **Waste** – all suppliers are required to implement appropriate systems to minimise, handle, store, transport and treat waste in a compliant manner. All waste must be treated to the highest levels of recycling with landfill used as a last resort only where alternative treatment options are not available. All suppliers are required to provide on request a full inventory of waste treated on behalf of Waste Experts.
- **Ecosystems and biodiversity** – Suppliers must be aware of ecosystems directly impacted by their operations and ensure that such activities are conducted in a manner to protect ecosystems and biodiversity.
- **Water** – suppliers must ensure that water is used efficiently, and that operations do not negatively affect access to safe water for the communities in which their operations are located. No contaminated or toxic wastewater should be discharged into the environment, and all water from waste treatment operations must be discharged in line with a relevant consent.
- **Chemicals** – suppliers are required to comply with legal requirements to ensure that exposure to

hazardous materials is required in line with COSHH legislation, providing on request to Waste Experts COSHH assessments for the workplace to reduce potential harm to employees and local communities. Where possible suppliers must prevent exposure at source by adopting safer substances and processes where available.

2.2 Modern Slavery and Exploitation

As a supplier to Waste Experts, we expect you to respect the personal dignity, privacy, and rights of everyone. Suppliers must prohibit behaviour including gestures, language, and physical contact that is sexual, coercive, threatening, abusive or exploitative. We expect suppliers to respect the personal dignity, privacy, and rights of everyone and refuse to make any person work against their will.

Slavery is a heinous crime and results in an abhorrent abuse of an individual's fundamental human rights. Modern Slavery takes various forms and can include slavery, servitude, forced or compulsory labour and human trafficking.

Waste Experts are committed to eliminating all forms of slavery and will not tolerate any such practices in our business or our supply chain. Under no circumstances will we put profit above the welfare and wellbeing of human beings.

Waste Experts will only transact business with suppliers who share our commitment to eliminating the use of slavery in any form, we expect our suppliers to implement measures to ensure that no such practices take place within their own organisation or their supply chain, to include but not limited to, involuntary prison labour, victims of slavery and human trafficking and allow all employees the choice to leave their employment freely upon reasonable notice. To meet these expectations, you should have a full understanding of your business operations and wider supply chain, and ensure that any potential human rights risks are assessed, managed and mitigated. You must comply with the requirements of the Modern Slavery Act 2015, and we encourage all suppliers to publish an annual modern slavery statement on the <https://modern-slavery-statement-registry.service.gov.uk/> regardless of it being a legal obligation or not. On request, we may require further information detailing your approach to due diligence, risk assessment and evidence of how you mitigate any identified risks in your own business and supply chain.

2.3 Supply Chain Transparency

To better understand the risks in our supply chain, Waste Experts work to the highest level of compliance and expect the same of all suppliers, we may request documentation to evidence compliance, or conduct on-site audits, review, and approve corrective action plans and verify implementation of corrective actions. Waste Experts is committed to working with supply partners to build capability throughout the supply chain. We use EcoVardis to assess strategic supplier partners on their sustainability maturity and if requested we would expect supplier partners to complete an annual assessment and improve their rating year on year. To encourage improvement around sustainability knowledge within our suppliers we encourage the use of free resources in <https://www.supplychainschool.co.uk/>

3. Enhance Communities

3.1 Social Value and Community impact

Waste Experts has a commitment to making sure our economic and social role in the community has the greatest possible positive impact. We recognise the role that our supply chain can play in supporting our approach and we expect our suppliers to understand how their activities impact their local area and wider community. We encourage them to make positive contributions and investments where appropriate, for example by providing local employment opportunities, skills development, and workforce volunteering. We expect our supply chain to build positive relationships and minimise disruption to their communities. Suppliers and their sub-contractors may be required to report on expected and actual social value delivery when collaborating on selected projects.

3.2 Supplier Diversity and local supply

We understand the value of an inclusive supply chain that is richly diverse with ethnic minority, women, LGBTQ, disabled, veteran as well as small, medium, and social enterprises and other diverse businesses reflective of the communities we serve. We expect our suppliers to provide diversity data if requested, and to identify opportunities to work with local and diverse supply partners where available.

4. Work ethically with transparency

Waste Experts is committed to conducting its business operations in an ethical an open manner and respects and supports the principles of fair competition, rejects all forms of corruption, and refuses to resort to any illicit procedures and actions for the purpose of obtaining an advantage or exemption outside the scope of local or international law.

4.1 Fair Competition

Competition laws protect businesses by ensuring that the terms of supply (e.g. Prices) are reflective of genuine market conditions. Behaviour which may restrict free and unfettered competition (e.g. price fixing, or market sharing) is unlawful and any breach of these laws can result in significant fines, debarment and even prison for individuals concerned, Compliance with these laws is mandatory. Waste Experts sets the prices of services in a lawful and consistent manner and do not, nor will not enter into any practices which may be considered unlawful or anti-competitive. Similarly, we expect that our suppliers will comply with all competition laws in as much as they will:

- Have a commercial strategy independent of competitors.
- Not disclose any sensitive commercial information to competitors
- Obtain market intelligence only via legitimate and lawful sources.
- Respect Intellectual Property of others (including Waste Experts)
- Adhere to international trade regulations and export control regulations.

4.2 Anti-bribery and Corruption

Bribery is the offering of value (e.g. cash, gifts, or hospitality) in return for gaining an improper advantage. Inducement and reward can take many forms and is not always obvious. Any form of bribery is strictly illegal under the UK Bribery Act 2010 and Waste Experts operate a zero-tolerance approach to bribery and corruption.

Waste Experts do not and will not give or receive any form of bribes or improper inducements to secure any advantage, nor will we authorise a third party to give or receive a bribe on our behalf. Suppliers should never on our behalf offer any form of facilitation payment even where it may be common practice or permitted by law. (Facilitation payments are monies paid to public officials to speed up a process which they are duty bound to provide).

4.3 Fraud

Generally, fraud is committed when a person uses deception to gain a financial or personal advantage. In the UK and most other countries fraud is a criminal offence. Waste Experts expect suppliers to always act honestly and with integrity. We will never seek to gain any advantage fraudulently or allow anyone else to do so on our behalf.

4.4 Conflicts of Interest

Suppliers to Waste Experts should never place their personal interest or gain above that of their employer while performing their work duties and should not seek any personal gain in the fulfilment of their professional duties. Suppliers should disclose to Waste Experts information regarding potential conflicts of interest relating to your activities as a supplier.

4.5 Compliance with the Law

As a responsible company, Waste Experts complies with all local, national, and international laws and regulations. We expect our suppliers to act in accordance with all applicable laws and regulations and to have introduced suitable processes and training to ensure full compliance with said laws and regulations.

4.6 Data Protection and Confidentiality

Waste Experts information, data, intellectual property, and personal information must be always protected and treated as confidential and in accordance with all applicable laws. This Code of Conduct sets out our expectations of suppliers in the way they handle personal information and intellectual property, whether obtained under a non-disclosure agreement or not.

Waste Experts require that all supplier partners must implement, monitor, and maintain appropriate information security and data protection controls to protect both personal and business data. Our IT networks are managed by our Parent Company City Electrical Factors (CEF), therefore in addition, supplier partners may be asked to complete an Information Security Supplier Review Questionnaire for CEF.

4.6a Confidential Information

Suppliers may be given access to certain information which is regarded as confidential while working with Waste Experts. This is generally information which is not in the public domain. This information is critical to our business and wrongful use could cause Waste Experts financial or reputational harm. If you are provided with confidential information, we expect you to keep it safe, not disclose it to any third party and keep the distribution list within your organisation limited to those necessary for you to undertake your work with Waste Experts. Suppliers may be asked to complete and sign a non-disclosure agreement to protect our confidential information, but even where this is not the case, we expect the above guidance to be followed. Should you come across any of our confidential information you should:

- Restrict any further circulation of the information.
- Notify Waste Experts immediately.
- Return all copies to us; and
- Erase any copies you may be holding.

4.6b Protection of personal data

If, during your work with Waste Experts you receive any personal data, we expect you to comply with all applicable local laws, including the Data Protection Act 2018 and General Data Protection Regulations (GDPR), relating to the use and safeguarding of that personal data. You must only use such data in accordance with our instructions and must implement appropriate technical and organisational measures to keep the personal data safe. Examples of personal data include names, addresses, telephone numbers and identification numbers.

4.6c Intellectual Property

Waste Experts has a significant amount of value in its intellectual property (IP) portfolio, which includes but is not

limited to, copyright, trademarks, design rights and patents. Any access to Waste Experts IP will only be granted on a limited basis and will be subject to a separate agreement, which will protect and advise on use of all IP.

4.6d Social media

Social media is now an integral part of our society, it enables us to convey messages and opinions to a wider audience instantaneously. The messages you convey become permanent public statements reflecting upon you, your business, your clients, and customers, we must be able to recognise the perception of these actions and behaviours. We expect our supplier partners to use social media in a responsible, reasonable, and respectful manner and any comments you make to align with the ethical values of Waste Experts

4.7 Gifts and entertainment

The giving and receiving of gifts or hospitality in connection with a legitimate business purpose can foster constructive relationships with suppliers. However, where excessive, or intended for an illegitimate purpose, hospitality and business gifts can erode trust in Waste Experts and compromise the integrity of the business relationship.

There is a fine balance between gifts and hospitality which are legitimate and those which are not. Generally, there is nothing wrong with giving or receiving nominal gifts or hospitality if they are both reasonable and proportionate. Gifts should never be cash or cash equivalent. The giving or receiving of gifts should never influence or appear to influence the impartial judgement and decision making by a Waste Experts employee.

4.8 Reporting and Whistleblowing

Waste Experts is committed to the highest standards of openness, transparency, and accountability and to giving all employees, clients, and suppliers the ability to voice concerns in a responsible and effective way. Where an individual discovers information which they believe shows serious malpractice or wrongdoing within Waste Experts, this information should be disclosed without fear of reprisal. We expect the same position to be adopted by all our suppliers.

Who to report to

If you suspect any part of this code of conduct has been breached, you should as soon as reasonably possible contact:

- Supply Chain Team supplychain@wasteexperts.co.uk
- Head of Commercial emma@wasteexperts.co.uk
- Head of Operations charlie@wasteexperts.co.uk

- Managing Director shaun@wasteexperts.co.uk

If the above route is not suitable or acceptable, the complainant may approach any of the above with an alternative suggestion or contact one of the whistleblowing prescribed bodies. Details of these are available on the Department for Business and trade website <https://www.gov.uk/government/organisations/department-for-business-and-trade>

The charity 'Protect' also provides free, confidential advice to workers who may have concerns about their workplace <https://protect-advice.org.uk/> or telephone 02031172502.

Agreement

I confirm that I am authorised to accept the Waste Experts Code of Conduct

Name		Company	
Signature		Date	