

# Whistleblowing Policy CPSPLGP023 v 1.3

### Introduction

Waste Experts are committed to conducting business fairly, honestly and with transparency and in compliance with all legal and regulatory obligations. We expect all Waste Experts Directors, team members and anyone acting on our behalf to do the same and maintain the highest standards of ethical business behaviour. All organisations face the risk of things going wrong from time to time. A culture of openness and accountability is essential to prevent such situations occurring and to address them when they do occur.

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

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

To ensure integrity and in an open and fair manner is to provide a robust whistleblowing policy and reporting channel so that all of our stakeholders (colleagues, customers, suppliers and the public) feel able to report any concerns regarding wrongdoing in confidence. We encourage everyone to report any concerns as soon as they arise; this includes concerns of any nature relating to Waste Experts personnel, as well as customers, suppliers and other third parties.

# Aim of the policy

- Encourage and empower stakeholders to speak up and report suspected wrongdoing as soon as
  possible, in the knowledge that their concerns will be taken seriously and investigated as
  appropriate, and that confidentiality will be respected.
- Provide stakeholders with guidance as to how to raise those concerns.
- Reassure stakeholders that they will be able to raise genuine concerns without fear of reprisals, even if the concerns turn out to be unfounded.
- Encourage a culture of openness
- Ensure compliance with relevant legislation.

This policy is not to be used to question financial decisions or business strategy, nor should it be used to raise matters which should be raised under the grievance procedure e.g. harassment, bullying or discrimination, or that are already the subject of a disciplinary process.

## Scope

This policy applies to all Waste Experts entities and personnel including directors, executives, officers, team members, contractors, agency workers, casual workers, consultants and trainees, no matter which team they work for and in which locations. It relates to actions by personnel as well as concerns with a customer, supplier or other third parties with which Waste Experts interacts or conducts business.



## Conduct that should be reported

Waste Experts wants to hear about conduct that is unlawful, dishonest or unethical as soon as possible and is committed to addressing it. Examples of such conduct is below; this is not an exhaustive list, and we encourage colleagues to report any behaviour or incidents which they have concerns about.

- Criminal activity or offences, including fraud, theft and embezzlement
- Corruption, bribery or blackmail
- Financial malpractice, impropriety or mismanagement
- Facilitation tax evasions
- Failure to comply with any legal or regulatory requirements
- Conduct likely to damage reputation or financial wellbeing
- Involvement with industries which promotes an adverse impact on health or the environment.
- Actions which endanger the health and safety of Waste Experts personnel or the public
- Actions which cause damage to the environment
- Unauthorised disclosure of confidential information
- The deliberate concealment of information relating to any of the above matters
- Any retaliation against someone for speaking up or "whistleblowing"

Everyone has a responsibility to report any such misconduct or potential misconduct as soon as they become aware of it. If you are uncertain whether something is within the scope of this policy, it is preferable to raise concerns.

### How to report a concern

All whistleblowing allegations or concerns should be directed to the Managing Director in the first instance who operates as our Whistleblowing Office. All complaints will be dealt with diligently and confidentially, and investigations will be carried out for all allegations or concerns that are raised, and where appropriate, action will be taken to rectify the situation.

# **VERSION CONTROL**

Version	Date	Author	Approver	Change Description
1.0	2/1/2022	J Richardson	S Donaghey	New Policy
1.1	13/6/2024	J Richardson	S Donaghey	Reviewed and updated
1.2	17/9/2024	J Richardson	S Donaghey	Reviewed and updated
1.3	2/1/2024	J Richardson	S Donaghey	Reviewed and updated