

Allwood Recycling Solutions

Supplier Code of Conduct

INTRODUCTION

We believe that we have a responsibility to be a good corporate citizen, we believe we can help shape and influence standards wherever we do business. As a consequence, we have given ourselves a strict set of ethical standards to guide us in our business dealings. We expect all our Suppliers, i.e., all companies who do business with Allwood Recycling Solutions to adhere to the same ethical standards.

This Code of Conduct document serves to outline the expected behaviours of Allwood Recycling Solutions Suppliers when engaged in producing goods or services for or on our behalf.

LEGALITY

We expect our Suppliers to comply with:

- All applicable UK laws and regulations
- All applicable European Union laws, directives and regulations
- The relevant laws, regulations and so on of other territories in which the Supplier operates
- International laws, treaties and agreements to which the UK government is party

Note: this includes not only those laws directly applicable to the selling of goods and services – it includes amongst others the laws on:

- Taxation – Allwood Recycling Solutions will not be party to the evasion of income, sales, corporate, value-added or other taxes, customs
- Duties or other charges
- Environmental regulations
- Employment, health and safety
- Bribery and corruption

Allwood Recycling Solutions are committed to the fair and effective application of laws and regulations. There is, therefore, a positive duty on Allwood Recycling Solutions and its Suppliers to report and refer to all reasonably founded suspicion of illegal activity.

ACCOUNTABILITY AND AUDITABILITY

We expect our Suppliers to maintain systems, whether manual or electronic, that will provide records that can be audited at a later date. This includes all records pertaining to purchases, contracts and commitments.

The supplier shall comply with applicable laws and regulations designed to combat money laundering activities. The supplier shall maintain financial records and reports according to international laws and regulations.

ALLWOOD RECYCLING SOLUTIONS

Supplier Code of Conduct

FAIR BUSINESS PRACTICE

Allwood Recycling Solutions conducts its business and activities in a competitive manner and expect its Suppliers, sub-contractors and agents to do the same. Suppliers shall not violate applicable anti-trust and anti-competition laws, rules and regulations, which, amongst other things, generally prohibits price-fixing, dividing territories and bid-rigging.

Allwood Recycling Solutions dealings and transactions with Suppliers will be at arms-length. To that end, Allwood Recycling Solutions Suppliers and staff must not be in a situation where a conflict of interest exists because of a family relationship, a personal relationship, a business relationship, an investment or due to some other connections or relationship. Any such relationship or investment that could give a rise to a conflict of interest must be promptly disclosed by the Supplier.

DATA PROTECTION & CONFIDENTIAL INFORMATION

The supplier shall adhere to relevant data protection and security laws as well as to respective regulations, in particular with regard to personal data of customers, consumers, employees and shareholders. The supplier shall comply with all said requirements when personal data is collected processed, transmitted or used.

Suppliers shall safeguard and make only appropriate use of confidential information. The supplier shall not disclose any information that is not known to the general public. Information should not be copied or reproduced without prior consent from Allwood Recycling Solutions.

The supplier should immediately notify Allwood Recycling Solutions of any breach in confidentiality.

REPUTATIONAL & REGULATORY RISKS

Allwood Recycling Solutions sources a wide range of products and services from a diverse supplier base. A supplier's misconduct could cause serious reputational damage to Allwood Recycling Solutions and their clients. Allwood Recycling Solutions expects supply partners to operate with integrity and responsibility.

Allwood Recycling Solutions expect all suppliers to be committed to the UN guidelines as detailed below:

THE TEN PRINCIPLES OF THE UN GLOBAL COMPACT

Human Rights

Principle 1 – Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2 – Make sure that they are complicit in human rights abuses

Labour

Principle 3 – Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining

Principle 4 – the elimination of all forms of forced and compulsory labour

Principle 5 – the effective abolition of child labour

Principle 6 – the elimination of discrimination in respect of employment and occupation

ALLWOOD RECYCLING SOLUTIONS

Supplier Code of Conduct

Environment

Principle 7 – Businesses should support a precautionary approach to environmental challenges

Principle 8 – Undertake initiatives to promote greater environmental responsibility

Principle 9 – encourage the development and diffusion of environmentally friendly technologies

Anti-Corruption

Principle 10 – Businesses should work against corruption in all its forms, including extortion and bribery

Allwood Recycling Solutions expects that all supply partners have programmes in place throughout their own activities and that of their supply chain to minimize:

- Employment practice issues
- Human Rights abuse
- Modern slavery exploitation
- Discrimination
- Equal opportunity issues
- Environmental issues
- Bribery and corruption
- Quality issues
- Business continuity implications

EMPLOYMENT PRACTICE

Allwood Recycling Solutions expect suppliers within their own businesses and their direct supply chain to:

- Comply with all applicable regulations regarding modern slavery and to take measures to identify and eliminate the risk of modern slavery within their own operations and that of its own supply chain
- Provide a safe and healthy environment for employees
- Comply with all laws regarding maximum work hours, vacation time, leave periods, holidays and to provide payment/benefits for overtime hours
- Only employ workers with valid documentation that proves their right to work
- Respect the rights of employees to freely associate, organize and collectively bargain
- Base all conditions of employment on an individual's ability to do the job and not on personal characteristics or beliefs. Employment decisions should be based on lawful non-discriminatory factors which, depending on the specific employment decision at issue, may include, but are not limited to some of the following factors: merit, experience, education, demonstrated performance, competency, assessment of performance, business needs, client needs, work level, job titles, compensation ranges, company policies, practices, and guidelines or other lawful non-discrimination factors applicable to the decision
- Not discriminate against employees or applicants because of their race, colour, gender, age, national origin, ancestry, religion, disability, sexual orientation or any other status or characteristic protected under law
- Treat all employees with respect and dignity and to promote an environment free from harassment and any form of physical pressures
- Ensure child labour is never used in any operation

ALLWOOD RECYCLING SOLUTIONS

Supplier Code of Conduct

ENVIRONMENTAL RISK

Allwood Recycling Solutions require that all partners have the following in place:

- Programmes to identify and measure the environmental impacts associated with their activities, products and services
- Programmes to reduce the environmental impacts associated with the production of its products and services
- Willingness to work alongside Allwood Recycling Solutions in mutually beneficial programmes to reduce the environmental impact across the lifecycle of the supply chain activities

ANTI-CORRUPTION AND BRIBERY

Allwood Recycling Solutions are governed by anti-bribery legislation and to this end expects that suppliers:

- Shall not directly or indirectly take part in or condone any form of corruption, including but not limited to bribes, inducements, grease or facilitation payments, kickbacks, fraud, extortion, money-laundering or doing business with prohibited individuals, countries or companies
- Shall not directly accept, offer or provide any improper inducements to, or attempt to improperly influence any government official, government entity, political party, political candidate, public international organisation, private individual, organisation or company.
- Shall be familiar with and comply with the UK Bribery Act and other applicable anti-corruption laws. In additions, they must ensure that their own, subcontractors and agents are also compliant

HEALTH AND SAFETY

Allwood Recycling Solutions expect its suppliers to strive to implement the standards of occupational health and safety at a high level by applying a health and safety management approach appropriate for the business. The supplier shall comply with applicable occupational health and safety regulations and provide a work environment that is safe and conducive to good health, to preserve the health of employees, safeguard third parties and prevent accidents, injuries and work-related illnesses. This includes regular workplace risk assessments and implementation of adequate hazard control and precautionary measures. Employees are to be adequately educated and trained in health and safety issues.

BUSINESS CONTINUITY

The supplier shall be prepared for any disruption of its business (e.g., natural disasters, terrorism, software issues, illness, pandemics, infectious diseases). This preparedness especially includes disaster plans to protect both employees as well as the environment as far as possible from the effects of possible disasters that arise within the domain of operations.

COMPLIANCE WITH THE SUPPLIER CODE OF CONDUCT

Allwood Recycling Solutions reserves the right, upon reasonable notice, to check compliance with the requirements of the Supplier Code of Conduct. We encourage our suppliers to implement their own binding guidelines for ethical behaviour.

Any breach of the obligations stipulated in this Supplier Code of Conduct is considered a material breach of contract by the supplier.