Recorra
Real Recycling



Compliance Pack

South East



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We are Recorra

Recorra is your commercial recycling expert, dedicated to delivering #RealRecycling.

Founded as a charity initiative in 1988, we are now a total waste management company and born environmentalists. Thousands of businesses across London and the South East trust us to help them better manage their resources. Our flexible operational approach, combined with our ability to recycle over 35 material streams, means we can be responsive to any business' needs.

By using data, technology and insight, we provide innovative and tailored solutions that achieve the best environmental outcomes.

Introduction

This Compliance Pack will assist you with due diligence and legal compliance and contains certificates, permits and insurance details for you to keep on file.

Recorra's Compliance pack is designed to meet the information needs of most clients. If you need additional information or clarification, don't hesitate to contact us at helpdesk.london@recorra.co.uk.

Company Details

Registered Office

52 Lant Street, London, SE1 1RB

Company Registration Number

3961507

VAT registration number

905 0669 32

Registered Waste Carrier Number

CBDU114789

Contact Details

London

52 Lant Street, London, SE1 1RB

020 7407 9100

helpdesk.london@recorra.co.uk

Brighton

Unit 6, 30 Chartwell Rd, Lancing, BN15 8TU

01273 685 628

helpdesk.southeast@recorra.co.uk

Hastings

Unit 11, Moorhurst Rd, St Leonards, Hastings, Saint Leonards-on-sea, TN38 9NB

01424 853985

helpdesk.southeast@recorra.co.uk

Bank Details

Natwest

London Bridge Branch, PO Box 35, 10 Southwark Street, London, SE1 1TT

Sort Code

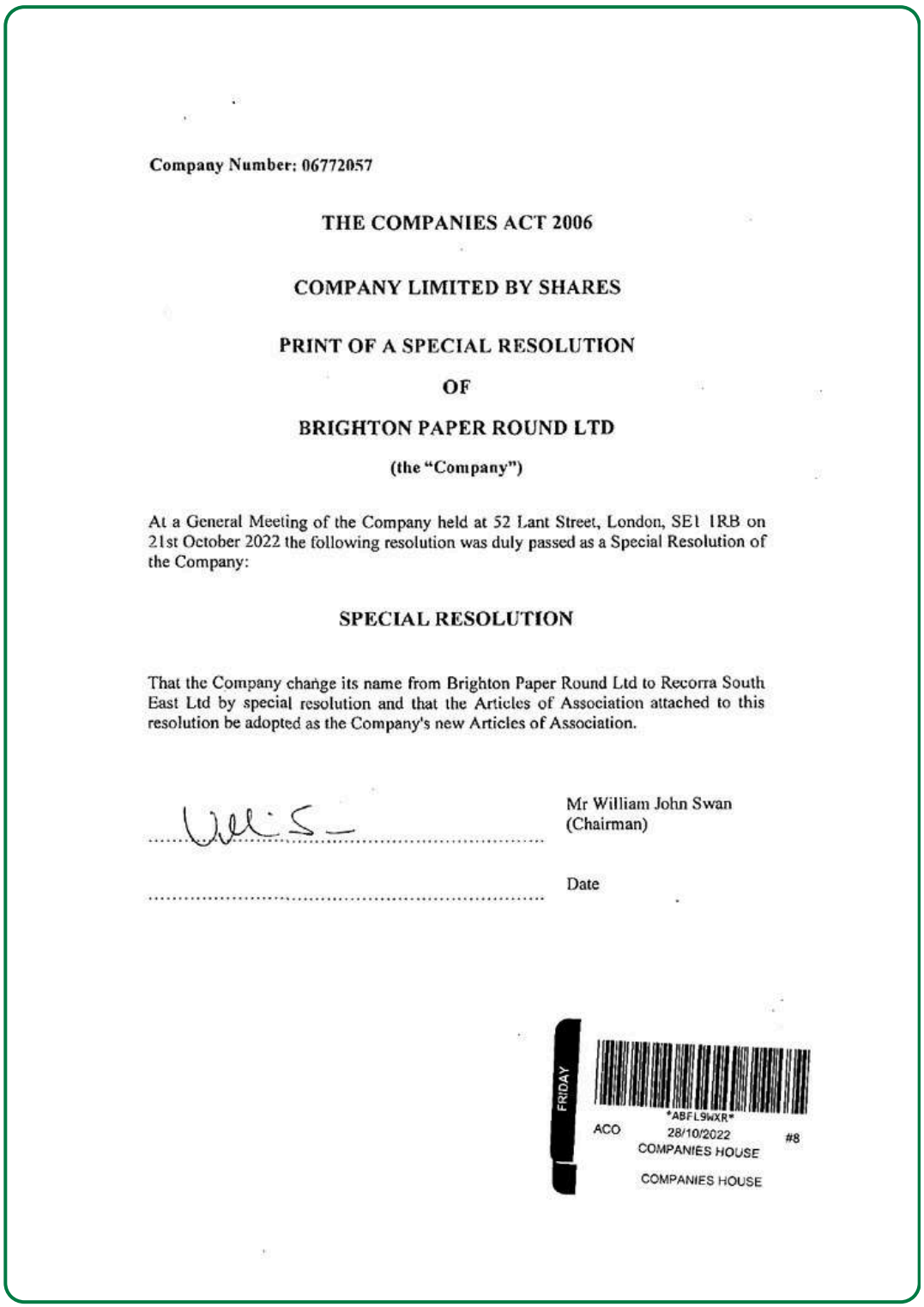
51-50-03

Account Number

65618963

We are Recorra

Certificate of Incoporation



Company Number: 06772057

THE COMPANIES ACT 2006

COMPANY LIMITED BY SHARES

PRINT OF A SPECIAL RESOLUTION

OF

BRIGHTON PAPER ROUND LTD

(the "Company")

At a General Meeting of the Company held at 52 Lant Street, London, SE1 1RB on 21st October 2022 the following resolution was duly passed as a Special Resolution of the Company:

SPECIAL RESOLUTION

That the Company change its name from Brighton Paper Round Ltd to Recorra South East Ltd by special resolution and that the Articles of Association attached to this resolution be adopted as the Company's new Articles of Association.

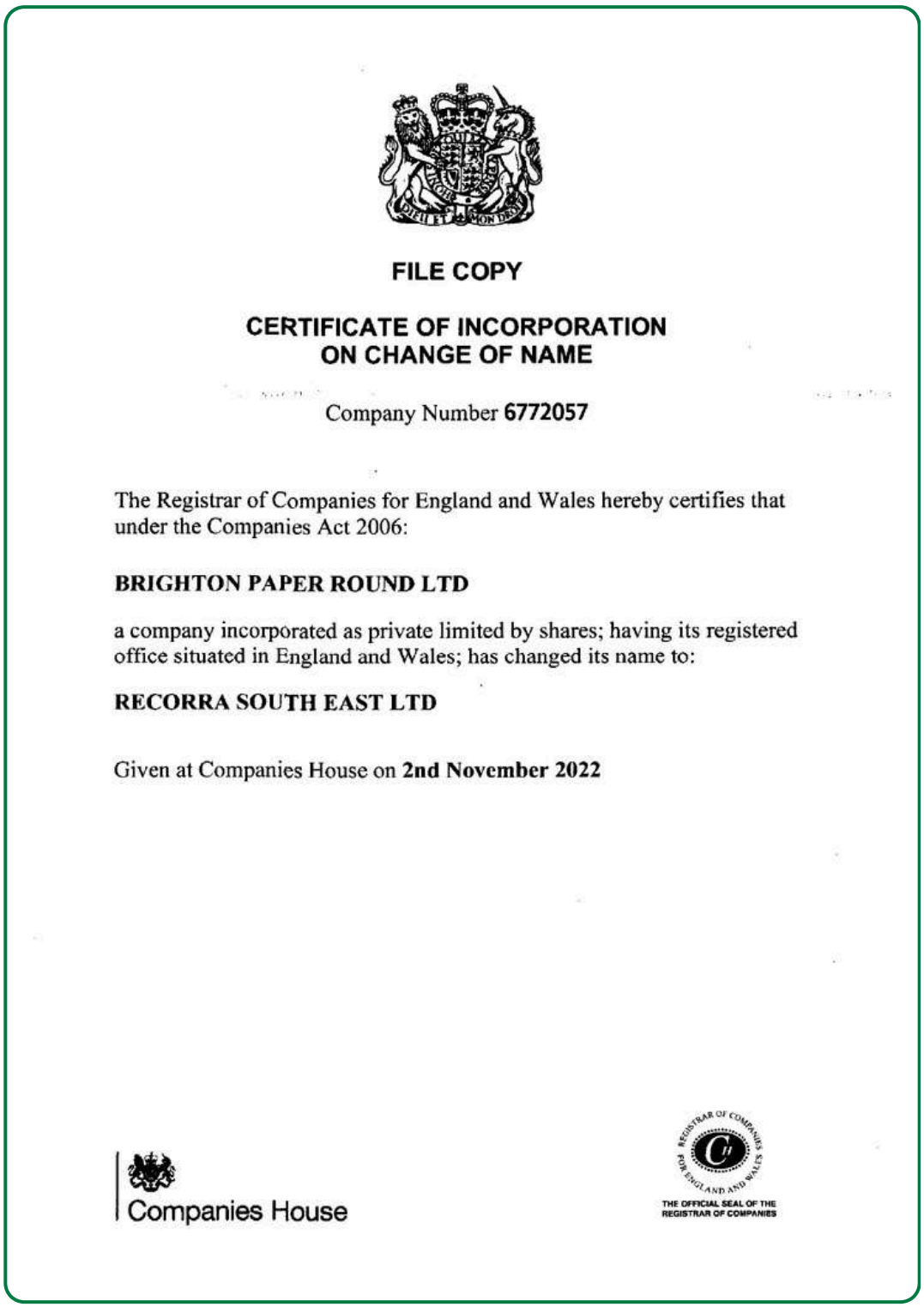
Mr William John Swan
(Chairman)

Date

FRIDAY
ABFL9WXR
ACO 28/10/2022 #8
COMPANIES HOUSE
COMPANIES HOUSE

We are Recorra

Certificate of Incoporation



FILE COPY

CERTIFICATE OF INCORPORATION
ON CHANGE OF NAME

Company Number **6772057**

The Registrar of Companies for England and Wales hereby certifies that under the Companies Act 2006:

BRIGHTON PAPER ROUND LTD

a company incorporated as private limited by shares; having its registered office situated in England and Wales; has changed its name to:

RECORRA SOUTH EAST LTD

Given at Companies House on **2nd November 2022**

Companies House

THE OFFICIAL SEAL OF THE REGISTRAR OF COMPANIES

Permits

Registered Waste Carriers License

Certificate of Registration under the Waste (England and Wales) Regulations 2011

Regulation authority

Name	Environment Agency
Address	National Customer Contact Centre 99 Parkway Avenue Sheffield S9 4WF
Telephone number	03708 506506

The Environment Agency certify that the following information is entered in the register which they maintain under regulation 28 of the Waste (England and Wales) Regulations 2011.

Carriers details

Name of registered carrier	RECORRA SOUTH EAST LTD
Registered as	An upper tier waste carrier, broker and dealer
Registration number	CBDU119013
Address of place of business	RECORRA BRIGHTON UNIT 6 30 CHARTWELL ROAD LANCING BUSINESS PARK LANCING BN15 8TU
Date of registration	15 July 2025
Expiry date of registration (unless revoked)	22 July 2028

This certificate was created on 15 July 2025. These details are correct at the time of certificate generation.

This copy has been issued under Regulation 6 of Waste (England and Wales) Amendment Act 2014 by the Environment Agency. This is copy number 2 of the certificate.

Making changes to your registration

Your registration will last 3 years and will need to be renewed after this period. If any of your details change, you must notify us within 28 days of the change.

Permits

Waste Exemption Registration



Waste exemption registration WEX475529

We confirm that the details you have entered, as shown below, are now on the exemptions register. Your registration should show on the public register within 24 hours. Your registration details, including contact, site and business addresses are below.

This document is not a permit. Exemptions may have ceased or been revoked.

To check whether these exemptions are still valid, check the company's registration WEX475529 on the public register of waste exemptions: https://environment.data.gov.uk/public-register/view/search-waste-exemptions

Business responsibilities

The business or organisation responsible for carrying out the exempt waste operations agrees to:

- comply with all limits on waste types and quantities
- comply with all conditions governing how waste must be stored, handled and treated
- carry out the operations without endangering human health or harming the environment

For the operations to remain exempt they must be carried out without:

- causing risk to water, air, soil, plants or animals
- causing a nuisance through noise and odours
- negatively affecting the countryside or places of special interest

In sensitive locations, extra controls may be needed over and above those set out in the exemptions to make sure this happens.

Registration details

Registration details

Reference Number	WEX475529
Date registered	14 October 2025

Waste exemptions

T4: Storing and preparing for further treatment	Expires on 13 October 2028
S2: Storing waste in a secure place	Expires on 13 October 2028

Your contact details

Your name	Trevor Bush
Your telephone number	01273685628
Your email address	trevor.bush@recorra.co.uk

Permits

Waste Exemption Registration

Waste operator details

Business or organisation type	Limited company
Waste operator responsible for these waste operations	RECORRA SOUTH EAST LTD
Address of the Waste operator	RECORRA BRIGHTON UNIT 6, 30 CHARTWELL ROAD LANCING BUSINESS PARK LANCING BN15 8TU

Waste operations contact

Name	Trevor Bush
Position	Facilities Manager
Telephone number	01273685628
Email	trevor.bush@recorra.co.uk
Address	RECORRA BRIGHTON UNIT 6, 30 CHARTWELL ROAD LANCING BUSINESS PARK LANCING BN15 8TU

Waste operation details

Grid reference	TQ 17461 03951
Site details	Opposite Rabbits Skips

Insurance

Recorra Insurance Overview

VERLINGUE

To Whom It May Concern, 28th April 2026

RE: Recorra Ltd and Recorra South East Ltd

We can confirm that we act as insurance brokers on behalf of the above insured, and that the following covers are in place:

Employers Liability

Insurer:	Aspen Insurance UK Limited
Policy number:	B190326MS174C0082
Cover period:	1st April 2026 to 31st March 2027
Indemnity limit:	£20,000,000 any one occurrence including costs and expenses

Public / Products Liability

Insurer:	Aspen Insurance UK Limited
Policy number:	B190326MS174C0082
Cover period:	1st April 2026 to 31st March 2027
Indemnity limit:	£10,000,000 – Any one occurrence and in all in respect of Products Liability

Professional Indemnity

Insurer:	Lloyds Uderwriters / Allied World Assurance Company (Europe) dac
Policy number:	B190325MS341C0553, B190325MS311C0113
Cover period:	1st April 2026 to 31st March 2027
Indemnity limit:	£10,000,000 any one claim

Hired in Plant

Insurer:	Aviva Insurance Limited
Policy number:	100674019 ENG
Cover period:	1st April 2026 to 31st March 2027
Indemnity limit	£250,000

REDHILL OFFICE: First floor, Forum House, 41-51 Brighton Road, Redhill, Surrey, RH1 6YS
T: 0333 010 0013 0 | www.verlingue.co.uk

FRANCE | UNITED KINGDOM | SWITZERLAND | PORTUGAL

Investor in Customers Gold 2022

Verlingue Limited. Registered in England & Wales. Reg No 4024377.
Reg Offices: First floor, Forum House, 41-51 Brighton Road, Redhill, Surrey, RH1 6YS.
Authorised and regulated by the Financial Conduct Authority. (FCA No. 306088)

WBN

Insurance

Recorra Insurance Overview

VERLINGUE

To Whom It May Concern, 28th April 2026

RE: Recorra Ltd and Recorra South East Ltd **Our Reference:** 2920679

We can confirm that we act as insurance brokers on behalf of the above insured, and that the following cover is in place:

Cyber Liability

Insurer:	CFC Underwriting Ltd
Policy number:	ESO0140756127
Cover period:	1st April 2026 to 31st March 2027
Indemnity limit:	£1,000,000 each and every claim
Cyber Crime:	£250,000 each and every claim
Business Interruption Waiting Period	8 hours
Aggregate Deductible:	£5,000 in the aggregate
Policyholder:	Recorra Ltd and Recorra South East Ltd

Please note this document is intended for use as evidence that the insurance as described herein, has been effected and shall be subject to all terms and conditions of the policy and that in the event of any inconsistency herewith, the terms and conditions of such policy shall prevail.

We trust the above meets with your approval, but if you do require any further assistance then please do not hesitate to contact us.

Yours faithfully,
Donna Hester –Client Service Manager – Corporate South
Verlingue Limited
Tel: (+44)1784608132
Email: donna.hester@verlingue.com

STAINES: Lotus 3 The Causeway, Staines-upon-Thames, Staines TW18 3AG
T: 0333 010 0013 | www.verlingue.co.uk
FRANCE | UNITED KINGDOM | SWITZERLAND | PORTUGAL

Verlingue Limited. Registered in England & Wales. Reg No 4024377.
Reg Offices: First floor, Forum House, 41-51 Brighton Road, Redhill, Surrey, RH1 6YS.
Authorised and regulated by the Financial Conduct Authority. (FCA No. 306088)

Insurance

Recorra Motor Insurance

RSA

Certificate of Motor Insurance

Policy Number:	RSAP0969931300
1. Description of Vehicles:	Any Goods Carrying Vehicle the property of the Policyholder or hired or lent to him other than by any person in his employ
2. Name of Policyholder:	Recorra Ltd
3. Effective start date of Insurance for the purposes of the relevant law:	00:00 hours 01/04/2026
4. Date of expiry of Insurance:	23:59 hours 31/03/2027
5. Persons, or classes of persons, entitled to drive: Provided that the person driving holds a licence to drive the vehicle, or has held and is not disqualified from holding or obtaining such a licence, and is driving on the Policyholder's order or with his permission.	The Policyholder and any person
6. Limitations of use:	Social domestic and pleasure purposes The Policyholder's own business
This Policy does not cover:	Speed testing, pacemaking or competitive driving The carriage of passengers for hire or reward

I hereby certify that the Policy to which the Certificate relates satisfies the requirements of the relevant law applicable in Great Britain, Northern Ireland, the Isle of Man, the Island of Jersey, the Island of Guernsey and the Island of Alderney.

Authorised Insurer:
Royal & Sun Alliance Insurance Ltd.
Note: For full details of your Insurance cover please read your Policy

Ken Norgrove
Chief Executive Officer
RSA UK & International

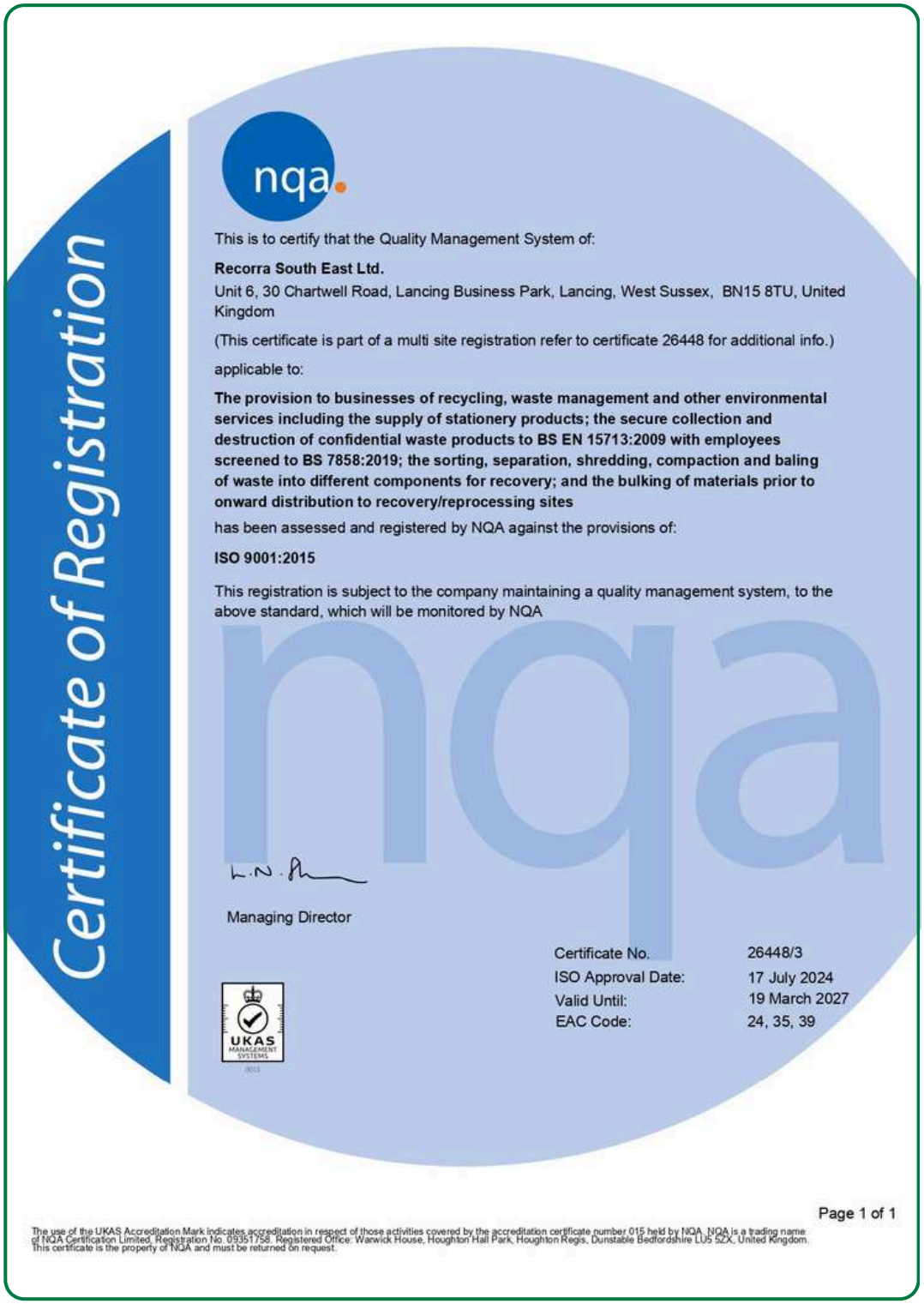
Note:
1. It is an offence under the Road Traffic Act to use a motor vehicle on a public road unless you have a valid Certificate of Motor Insurance.
2. You should pay your renewal premium promptly so that your new Certificate can be delivered to you before the expiry date shown above.
3. Cancellation – if this policy is cancelled this Certificate will no longer be valid and the vehicle will be removed from the Motor Insurance Database from the cancellation date.

Third Party Claims
Nothing contained in this Certificate affects your right as a third party to make a claim.

Royal & Sun Alliance Insurance Ltd (No.93792). Registered in England and Wales at St Mark's Court, Chart Way, Horsham, West Sussex, RH12 1XL. Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. For your protection, telephone calls will be recorded and may be monitored.

Certifications

ISO 9001 Certificate Lancing



Certificate of Registration

nqa.

This is to certify that the Quality Management System of:

Recorra South East Ltd.

Unit 6, 30 Chartwell Road, Lancing Business Park, Lancing, West Sussex, BN15 8TU, United Kingdom

(This certificate is part of a multi site registration refer to certificate 26448 for additional info.)

applicable to:

The provision to businesses of recycling, waste management and other environmental services including the supply of stationery products; the secure collection and destruction of confidential waste products to BS EN 15713:2009 with employees screened to BS 7858:2019; the sorting, separation, shredding, compaction and baling of waste into different components for recovery; and the bulking of materials prior to onward distribution to recovery/reprocessing sites

has been assessed and registered by NQA against the provisions of:

ISO 9001:2015

This registration is subject to the company maintaining a quality management system, to the above standard, which will be monitored by NQA

Managing Director

Certificate No.	26448/3
ISO Approval Date:	17 July 2024
Valid Until:	19 March 2027
EAC Code:	24, 35, 39

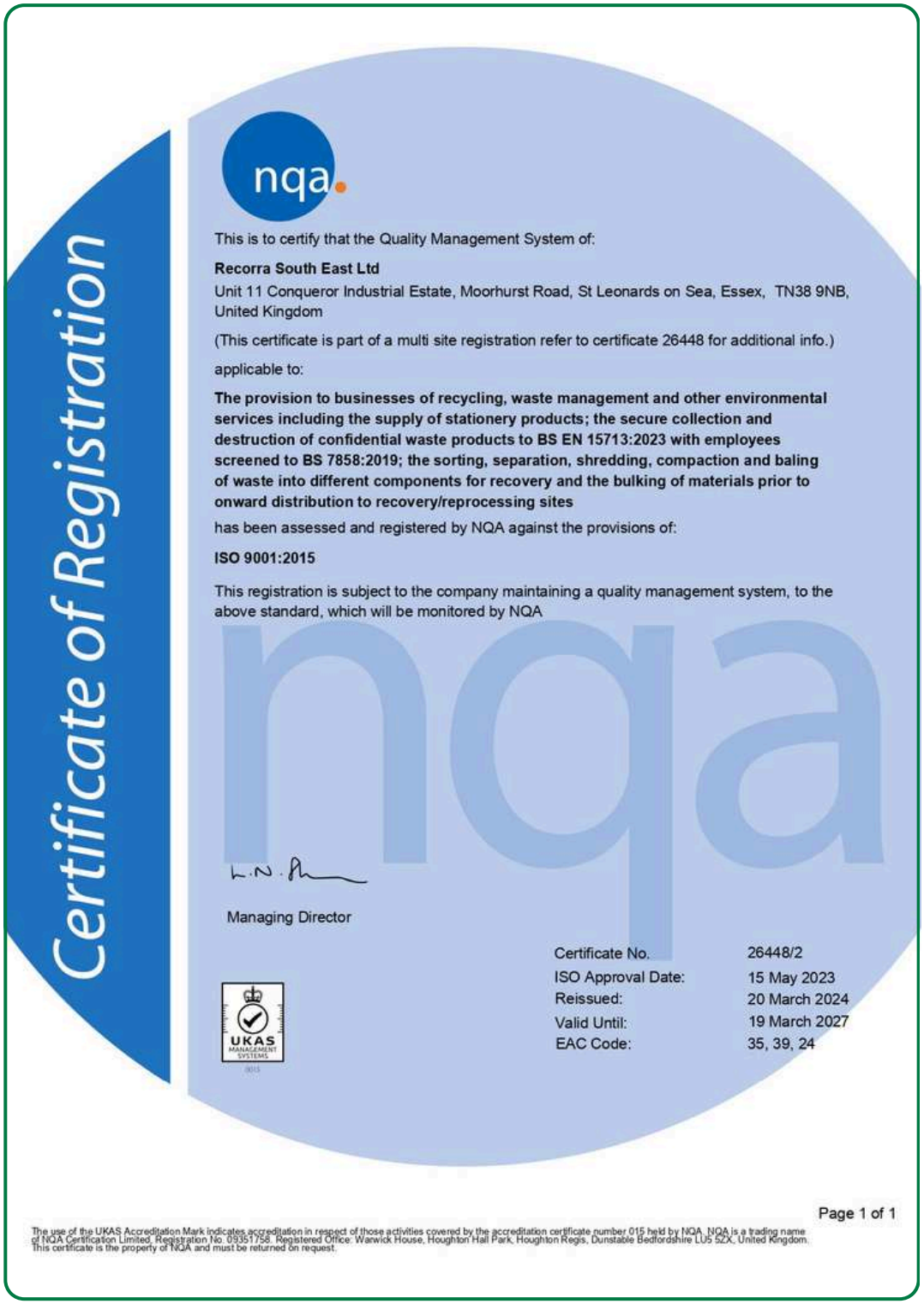
UKAS MANAGEMENT SYSTEMS

Page 1 of 1

The use of the UKAS Accreditation Mark indicates accreditation in respect of those activities covered by the accreditation certificate number 015 held by NQA. NQA is a trading name of NQA Certification Limited, Registration No. 03351758. Registered Office: Warwick House, Houghton Hall Park, Houghton Regis, Dunstable Bedfordshire LU5 5ZX, United Kingdom. This certificate is the property of NQA and must be returned on request.

Certifications

ISO 9001 Certificate Hastings



Certificate of Registration

nqa

This is to certify that the Quality Management System of:

Recorra South East Ltd

Unit 11 Conqueror Industrial Estate, Moorhurst Road, St Leonards on Sea, Essex, TN38 9NB, United Kingdom

(This certificate is part of a multi site registration refer to certificate 26448 for additional info.)

applicable to:

The provision to businesses of recycling, waste management and other environmental services including the supply of stationery products; the secure collection and destruction of confidential waste products to BS EN 15713:2023 with employees screened to BS 7858:2019; the sorting, separation, shredding, compaction and baling of waste into different components for recovery and the bulking of materials prior to onward distribution to recovery/reprocessing sites

has been assessed and registered by NQA against the provisions of:

ISO 9001:2015

This registration is subject to the company maintaining a quality management system, to the above standard, which will be monitored by NQA

Managing Director

UKAS MANAGEMENT SYSTEMS

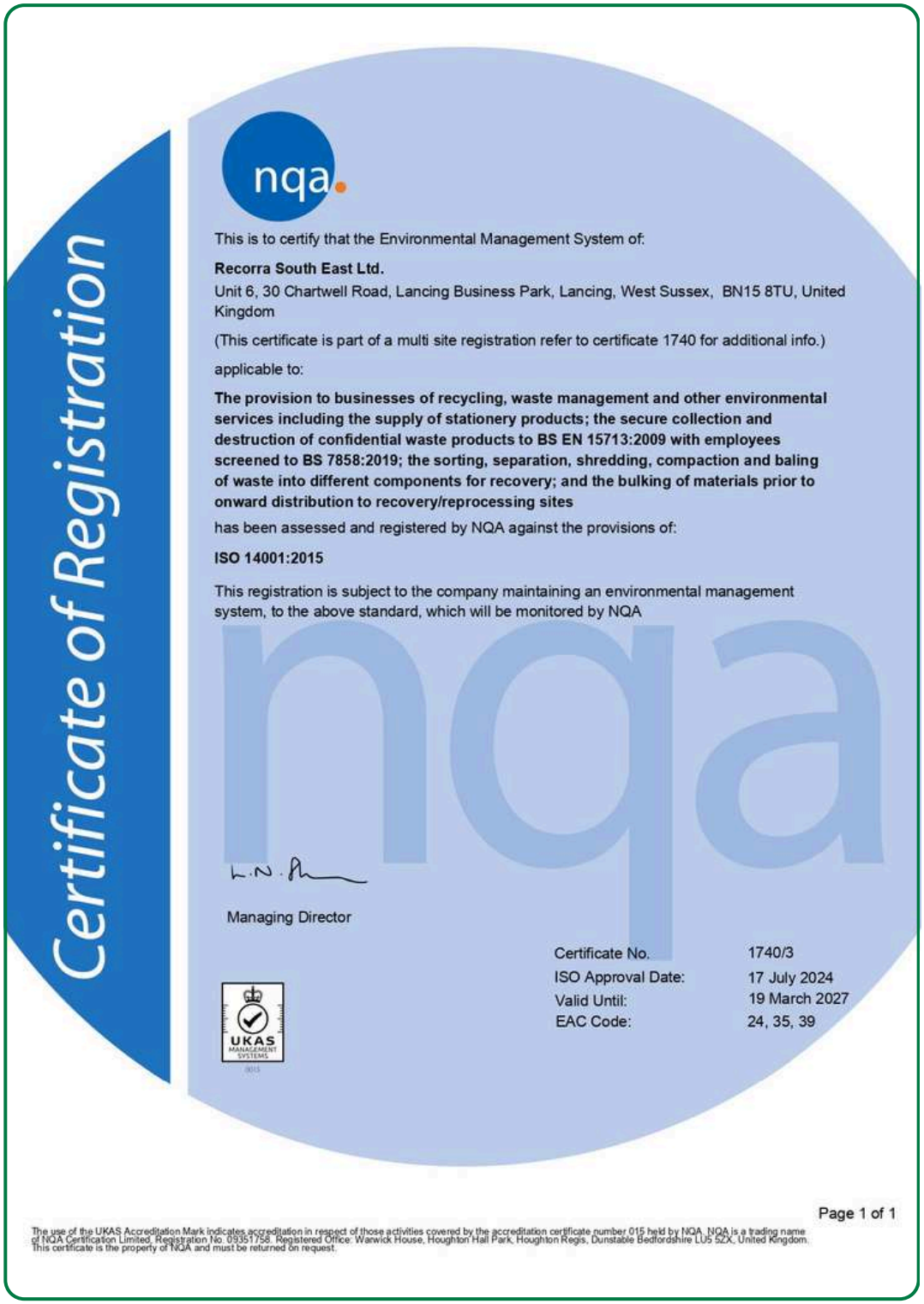
Certificate No.	26448/2
ISO Approval Date:	15 May 2023
Reissued:	20 March 2024
Valid Until:	19 March 2027
EAC Code:	35, 39, 24

Page 1 of 1

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Certifications

ISO 14001 Certificate Lancing



Certificate of Registration

nqa.

This is to certify that the Environmental Management System of:

Recorra South East Ltd.

Unit 6, 30 Chartwell Road, Lancing Business Park, Lancing, West Sussex, BN15 8TU, United Kingdom

(This certificate is part of a multi site registration refer to certificate 1740 for additional info.)

applicable to:

The provision to businesses of recycling, waste management and other environmental services including the supply of stationery products; the secure collection and destruction of confidential waste products to BS EN 15713:2009 with employees screened to BS 7858:2019; the sorting, separation, shredding, compaction and baling of waste into different components for recovery; and the bulking of materials prior to onward distribution to recovery/reprocessing sites

has been assessed and registered by NQA against the provisions of:

ISO 14001:2015

This registration is subject to the company maintaining an environmental management system, to the above standard, which will be monitored by NQA

Managing Director

Certificate No.	1740/3
ISO Approval Date:	17 July 2024
Valid Until:	19 March 2027
EAC Code:	24, 35, 39

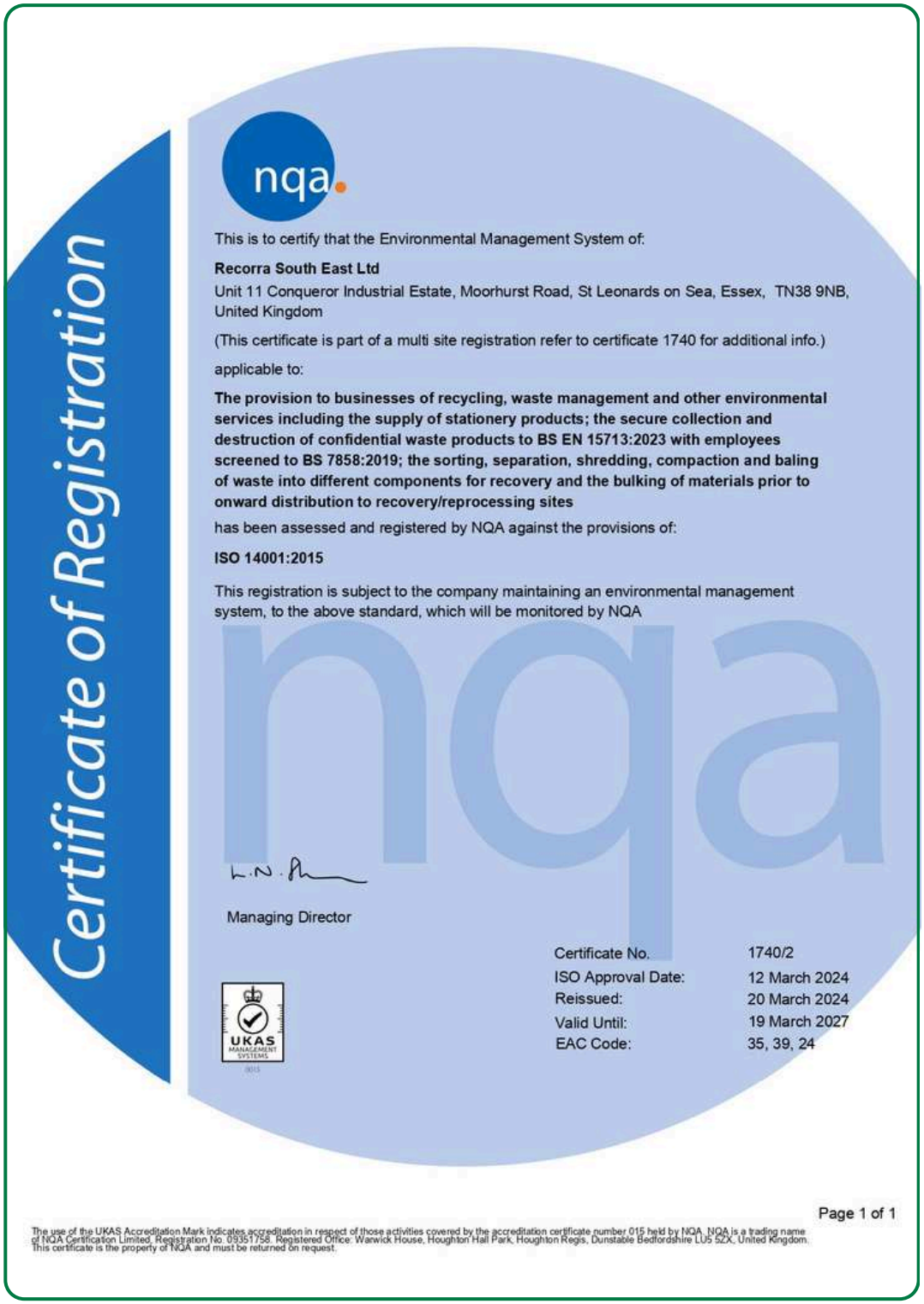
UKAS MANAGEMENT SYSTEMS

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Certifications

ISO 14001 Certificate Hastings



Certificate of Registration

nqa

This is to certify that the Environmental Management System of:

Recorra South East Ltd

Unit 11 Conqueror Industrial Estate, Moorhurst Road, St Leonards on Sea, Essex, TN38 9NB, United Kingdom

(This certificate is part of a multi site registration refer to certificate 1740 for additional info.)

applicable to:

The provision to businesses of recycling, waste management and other environmental services including the supply of stationery products; the secure collection and destruction of confidential waste products to BS EN 15713:2023 with employees screened to BS 7858:2019; the sorting, separation, shredding, compaction and baling of waste into different components for recovery and the bulking of materials prior to onward distribution to recovery/reprocessing sites

has been assessed and registered by NQA against the provisions of:

ISO 14001:2015

This registration is subject to the company maintaining an environmental management system, to the above standard, which will be monitored by NQA

Managing Director

UKAS MANAGEMENT SYSTEMS

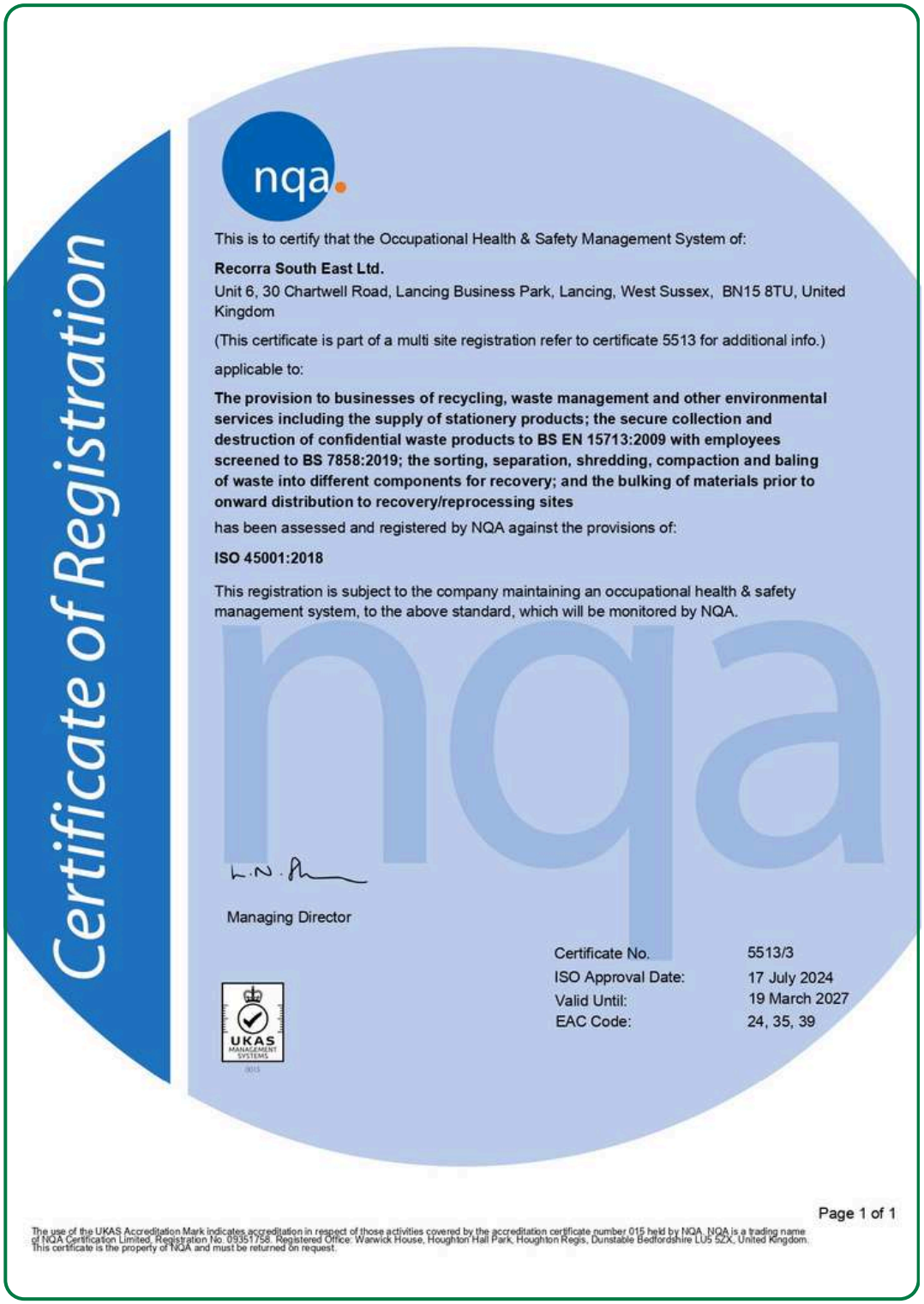
Certificate No.	1740/2
ISO Approval Date:	12 March 2024
Reissued:	20 March 2024
Valid Until:	19 March 2027
EAC Code:	35, 39, 24

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Certifications

ISO 45001 Certificate Lancing



Certificate of Registration

nqa

This is to certify that the Occupational Health & Safety Management System of:

Recorra South East Ltd.

Unit 6, 30 Chartwell Road, Lancing Business Park, Lancing, West Sussex, BN15 8TU, United Kingdom

(This certificate is part of a multi site registration refer to certificate 5513 for additional info.)

applicable to:

The provision to businesses of recycling, waste management and other environmental services including the supply of stationery products; the secure collection and destruction of confidential waste products to BS EN 15713:2009 with employees screened to BS 7858:2019; the sorting, separation, shredding, compaction and baling of waste into different components for recovery; and the bulking of materials prior to onward distribution to recovery/reprocessing sites

has been assessed and registered by NQA against the provisions of:

ISO 45001:2018

This registration is subject to the company maintaining an occupational health & safety management system, to the above standard, which will be monitored by NQA.

Managing Director

Certificate No.	5513/3
ISO Approval Date:	17 July 2024
Valid Until:	19 March 2027
EAC Code:	24, 35, 39

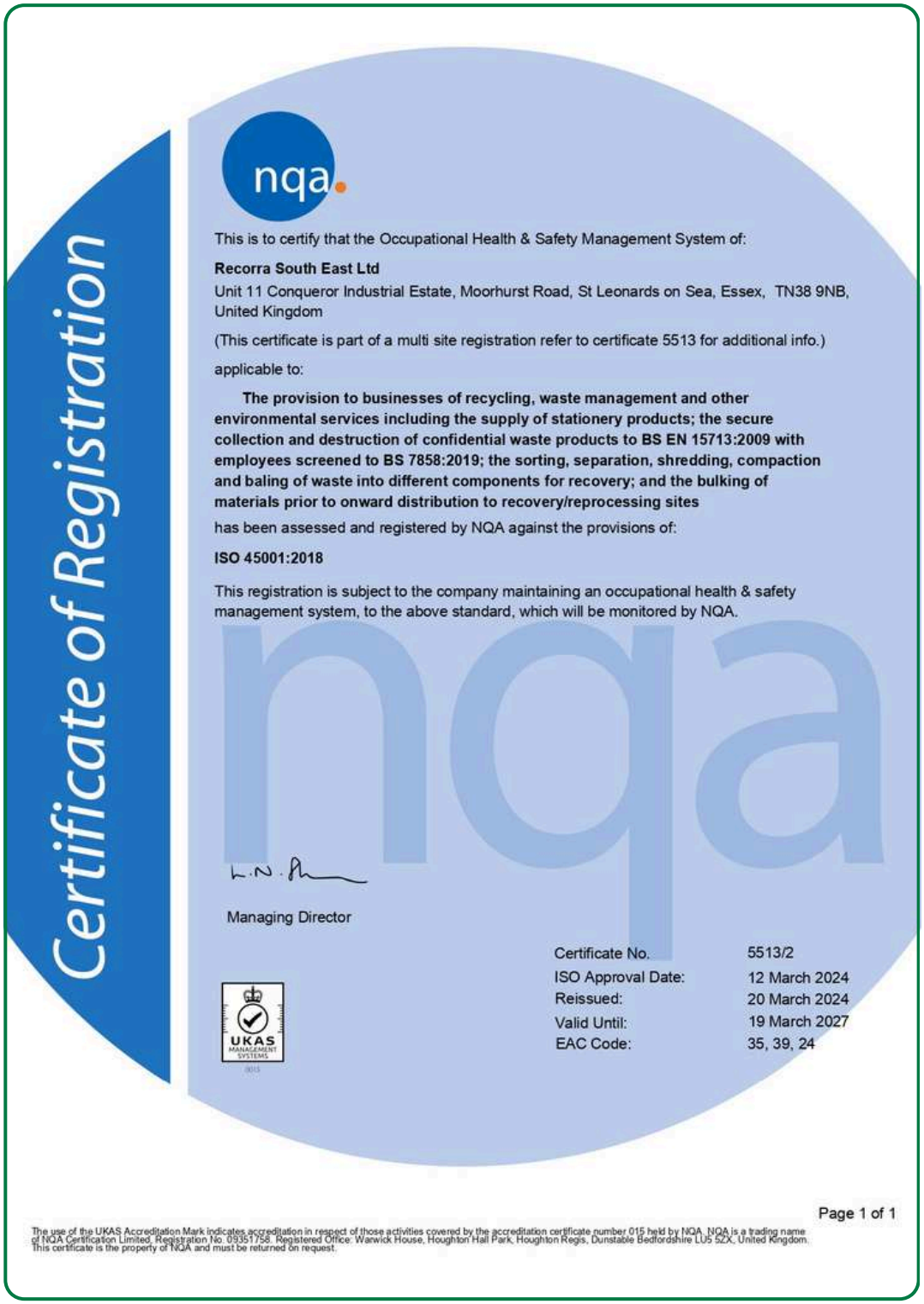
UKAS MANAGEMENT SYSTEMS

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Certifications

ISO 45001 Certificate Hastings



Certificate of Registration

nqa.

This is to certify that the Occupational Health & Safety Management System of:

Recorra South East Ltd
Unit 11 Conqueror Industrial Estate, Moorhurst Road, St Leonards on Sea, Essex, TN38 9NB, United Kingdom

(This certificate is part of a multi site registration refer to certificate 5513 for additional info.)

applicable to:

The provision to businesses of recycling, waste management and other environmental services including the supply of stationery products; the secure collection and destruction of confidential waste products to BS EN 15713:2009 with employees screened to BS 7858:2019; the sorting, separation, shredding, compaction and baling of waste into different components for recovery; and the bulking of materials prior to onward distribution to recovery/reprocessing sites

has been assessed and registered by NQA against the provisions of:

ISO 45001:2018

This registration is subject to the company maintaining an occupational health & safety management system, to the above standard, which will be monitored by NQA.

Managing Director

Certificate No.	5513/2
ISO Approval Date:	12 March 2024
Reissued:	20 March 2024
Valid Until:	19 March 2027
EAC Code:	35, 39, 24

UKAS MANAGEMENT SYSTEMS

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Certifications

SafeContractor Certificate



SafeContractor

Certificate of Approval

This is to certify that
Recorra Ltd

has achieved SafeContractor approval

Date: 28th April 2026
This certificate is valid until: 29th May 2027
Certificate number: HV0411

Signed:

Tim Jackson
SafeContractor CEO

SSIP
Founder Member

UKAS
INSPECTION
23043

SafeContractor
APPROVED

SafeContractor Ltd is a UKAS accredited Type C Inspection body under ISO17020:2012 covering the SSIP Core Criteria element of the SafeContractor Assessment Standard.
Full Validation of this certification should be made via the SSIP Portal https://www.ssipportal.org.uk/

Certifications

Cyber Essentials Certificate



CYBER ESSENTIALS PLUS

CERTIFICATE OF ASSURANCE

Recorra Ltd

52 Lant Street London SE1 1RB

COMPLIES WITH THE REQUIREMENTS OF THE CYBER ESSENTIALS PLUS SCHEME

NAME OF ASSESSOR : Jamie Brown

CERTIFICATE NUMBER : a09bea43-a9bc-4b95-8ec7-3fe9cc98a9ff

PROFILE VERSION : 3.2 (Willow)

SCOPE : Whole organisation.

DATE OF CERTIFICATION :2026-03-04

RECERTIFICATION DUE : 2027-03-04

SCAN QR CODE TO VERIFY THE AUTHENTICITY OF THIS CERTIFICATE

CERTIFICATION MARK

CERTIFICATION BODY

Bridewell CONSULTING

CYBER ESSENTIALS PARTNER

iasme

The Certificate certifies that the organisation was assessed as meeting the Cyber Essentials Plus implementation profile and thus that, at the time of testing, the organisations ICT defences were assessed as satisfactory against commodity based cyber attack. However, this Certificate does not in any way guarantee that the organisations defences will remain satisfactory against a cyber attack.

Policies

Anti-bribery



Recorra

Recorra Ltd – ANTI-BRIBERY POLICY

Introduction

One of Recorra's core values is to uphold responsible and fair business practices. We are committed to promoting and maintaining the highest level of ethical standards in relation to all of our business activities. Our reputation for maintaining lawful business practices is of paramount importance and this Policy is designed to preserve these values.

The Company therefore has a zero-tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all our business dealings and relationships and implementing and enforcing effective systems to counter bribery.

Purpose and scope of Policy

This Policy sets out the Company's position on any form of bribery and corruption and provides guidelines aimed at:

- ensuring compliance with anti-bribery laws, rules and regulations, not just within the UK but in any other country within which the Company may carry out its business or in relation to which its business may be connected
- enabling employees and persons associated with the Company to understand the risks associated with bribery and to encourage them to be vigilant and effectively recognise, prevent and report any wrongdoing, whether by themselves or others
- providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with
- creating and maintaining a rigorous and effective framework for dealing with any suspected instances of bribery or corruption

This Policy applies to all permanent and temporary employees of the Company (including any of its intermediaries, subsidiaries or associated companies). It also applies to any individual or corporate entity associated with the Company or who performs functions in relation to, or for and on behalf of, the Company, including, but not limited to, directors, agency workers, casual workers, contractors, consultants, seconded staff, agents, suppliers and sponsors ("associated persons"). All employees and associated persons are expected to adhere to the principles set out in this Policy.

Legal obligations

The UK legislation on which this Policy is based is the Bribery Act 2010 and it applies to the Company's conduct both in the UK and abroad. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is an offence in the UK to:

- offer, promise or give a financial or other advantage to another person (i.e. bribe a person), whether within the UK or abroad, with the intention of inducing or rewarding improper conduct
- request, agree to receive or accept a financial or other advantage (i.e. receive a bribe) for or in relation to improper conduct
- bribe a foreign public official

You can be held personally liable for any such offence.

1

Policies

Anti-bribery



It is also an offence in the UK for an employee or an associated person to bribe another person in the course of doing business intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business, for the Company. The Company can be liable for this offence where it has failed to prevent such bribery by associated persons. As well as an unlimited fine, it could suffer substantial reputational damage.

Policy statement

All employees and associated persons are required to:

- comply with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business
- act honestly, responsibly and with integrity
- safeguard and uphold the Company's core values by operating in an ethical, professional and lawful manner at all times

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a bribe.

The Company recognises that industry practices may vary from country to country or from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidelines set out in this Policy is expected of all employees and associated persons, at all times. If in doubt as to what might amount to bribery or what might constitute a breach of this Policy, refer the matter to your line manager or to a Director.

For the Company's rules and procedures in relation to the receipt of business gifts from third parties and corporate hospitality offered to or received from third parties, please refer to the Company's Employee Handbook. This forms part of the Company's zero tolerance policy towards bribery and they should be read in conjunction with this Policy.

The giving of business gifts to clients, customers, contractors and suppliers is not prohibited provided the following requirements are met:

- the gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage
- it complies with local laws
- it is given in the Company's name, not in the giver's personal name
- it does not include cash or a cash equivalent (such as gift vouchers)
- it is of an appropriate and reasonable type and value and given at an appropriate time
- it is given openly, not secretly
- it is approved in advance by a director of the Company

In summary, it is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

Any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a "facilitation

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Policies

Anti-bribery

payment", is also strictly prohibited. Facilitation payments are not commonly paid in the UK but they are common in some other jurisdictions.

Responsibilities and reporting procedure

It is the contractual duty and responsibility of all employees and associated persons to take whatever reasonable steps are necessary to ensure compliance with this Policy and to prevent, detect and report any suspected bribery or corruption. You must immediately disclose to the Company any knowledge or suspicion you may have that you, or any other employee or associated person, has plans to offer, promise or give a bribe or to request, agree to receive or accept a bribe in connection with the business of the Company. For the avoidance of doubt, this includes reporting your own wrongdoing. The duty to prevent, detect and report any incident of bribery and any potential risks rests not only with the directors of the Company but equally to all employees and associated persons.

The Company is committed to taking appropriate action against bribery and corruption. This could include either reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.

The Company will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. It is also committed to ensuring nobody suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or corruption offence has taken place or may take place in the future.

Record keeping

All accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off the record" to facilitate or conceal improper payments.

Sanctions for breach

A breach of any of the provisions of this Policy will constitute a disciplinary offence and will be dealt with in accordance with the Company's disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the employee liable to summary dismissal.

As far as associated persons are concerned, a breach of this Policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement.

Training

The Company will provide training to all employees to help them understand their duties and responsibilities under this Policy. The Company's zero tolerance approach to bribery will also be communicated to all business partners at the outset of the business relationship with them and as appropriate thereafter.

This policy will be reviewed on an annual basis.

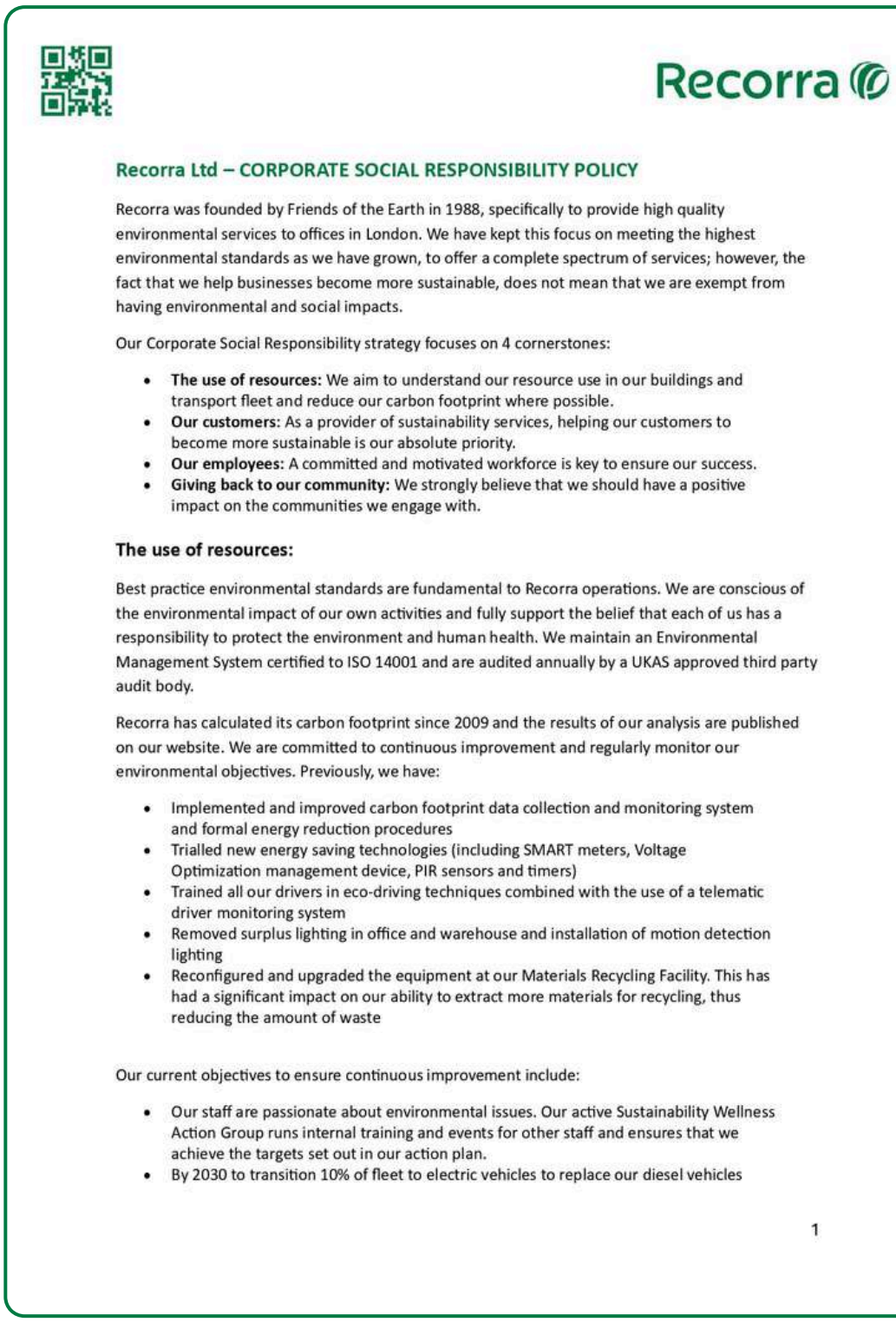
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MANAGING DIRECTOR

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Policies

Corporate Social Responsibility



Recorra

Recorra Ltd – CORPORATE SOCIAL RESPONSIBILITY POLICY

Recorra was founded by Friends of the Earth in 1988, specifically to provide high quality environmental services to offices in London. We have kept this focus on meeting the highest environmental standards as we have grown, to offer a complete spectrum of services; however, the fact that we help businesses become more sustainable, does not mean that we are exempt from having environmental and social impacts.

Our Corporate Social Responsibility strategy focuses on 4 cornerstones:

- **The use of resources:** We aim to understand our resource use in our buildings and transport fleet and reduce our carbon footprint where possible.
- **Our customers:** As a provider of sustainability services, helping our customers to become more sustainable is our absolute priority.
- **Our employees:** A committed and motivated workforce is key to ensure our success.
- **Giving back to our community:** We strongly believe that we should have a positive impact on the communities we engage with.

The use of resources:

Best practice environmental standards are fundamental to Recorra operations. We are conscious of the environmental impact of our own activities and fully support the belief that each of us has a responsibility to protect the environment and human health. We maintain an Environmental Management System certified to ISO 14001 and are audited annually by a UKAS approved third party audit body.

Recorra has calculated its carbon footprint since 2009 and the results of our analysis are published on our website. We are committed to continuous improvement and regularly monitor our environmental objectives. Previously, we have:

- Implemented and improved carbon footprint data collection and monitoring system and formal energy reduction procedures
- Trialled new energy saving technologies (including SMART meters, Voltage Optimization management device, PIR sensors and timers)
- Trained all our drivers in eco-driving techniques combined with the use of a telematic driver monitoring system
- Removed surplus lighting in office and warehouse and installation of motion detection lighting
- Reconfigured and upgraded the equipment at our Materials Recycling Facility. This has had a significant impact on our ability to extract more materials for recycling, thus reducing the amount of waste

Our current objectives to ensure continuous improvement include:

- Our staff are passionate about environmental issues. Our active Sustainability Wellness Action Group runs internal training and events for other staff and ensures that we achieve the targets set out in our action plan.
- By 2030 to transition 10% of fleet to electric vehicles to replace our diesel vehicles

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Policies

Corporate Social Responsibility



Recorra

- A Science Based Target to reduce our emissions in line with a 2 degree warming , (scope 1 and scope 2 GHG emissions 30 % by 2030 from a 2018 base year, and to measure and reduce its scope 3 emissions)

Our customers:

It is Recorra's aim to provide a consistent, high quality service which meets the requirements and expectations of our customers at all times. This commitment to quality is based on the implementation of a Quality Management System which is certified to ISO 9001 and audited annually by a UKAS approved third party audit body. This system provides clear standards and guidelines for all areas of the company's activities. The Directors, Senior Management Team and all employees of Recorra are fully committed to a process of continuous improvement in all our products and services. We monitor customer satisfaction and service performance through defined KPIs and objectives.

We provide a wide range of added value services including launch days, seminars, waste management reports, waste audits and volunteering opportunities with our charity partners. We also aim to provide customers with a recycling option for all their waste. We have recently introduced a compostable waste stream and a SustainABLE box to collect hard-to-recycle items, in line with this objective.

Our employees:

As a service provider, our employees are our most valued asset. Recorra's Senior Management Team recognises that a passionate, motivated and happy workforce is paramount to our success, and in order to achieve this, has set out a number of areas for investing in our people:

- **Learning and development** – As an employer, we seek to ensure equality of opportunity and treatment in the recruitment, selection, retention, training and promotion of staff at all levels, and the adoption of flexible patterns of working.

- **Rewards and team building** - Each line manager has an annual budget available to spend on team building activities for staff. Rewards are available for employees who do well (outside of their normal performance related pay). Social events for the whole organisation are organised across all Recorra sites.

- **Internal marketing, communications and engagement** – Internal staff updates are presented on a regular basis by Company Directors along with quarterly staff newsletters and HR emails circulated by line managers. We carry out an annual staff survey which is anonymous and provides an opportunity for staff to be honest about how they feel about the company and their work-life balance. We take action points from the survey and these are implemented by the Senior Management Team over the course of the following year.

Giving back to our community:

At Recorra, a commitment to charity is part of who we are, not just what we do. We run a substantial annual program of donations to environmental charities and have donated over

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Corporate Social Responsibility

Recorra

£650,000 since 2001. We recognise that helping charities to succeed is a collective effort and actively encourage customers, partners and staff to get involved. Recorra has seven main charity partnerships which enable us to give back to the community:

- *Friends of the Earth* - Originally Paper Round was started by Friends of the Earth and we retain strong links with the charity. Our Managing Director serves as Treasurer on the Friends of the Earth Charitable Trust Board.
- *The Zoological Society of London (ZSL)* - Recorra has a close relationship with the ZSL holding an annual donations ceremony and organising volunteering opportunities for clients and staff, to help out at the Zoo.
- *Trees for Cities* – For every new customer that starts recycling paper on our membership service, we fund the planting of 1 tree.
- Plan Zheroes (London) – For every food waste bin collected, we donate enough for one meal to feed a vulnerable person.
- Fareshare (South East) – For every food waste bin collected, we donate enough for one meal to feed a vulnerable person.
- *The Children's Literacy Charity* – for every 15 PCs or laptops we collect, we donate the value of one tutoring session for a child at risk of illiteracy.
- *Umthombo Trust* – sponsor an annual Eco Youth Circle (Club) for young people from the low-resource community in Knysna, South Africa.

This policy will be reviewed on an annual basis.

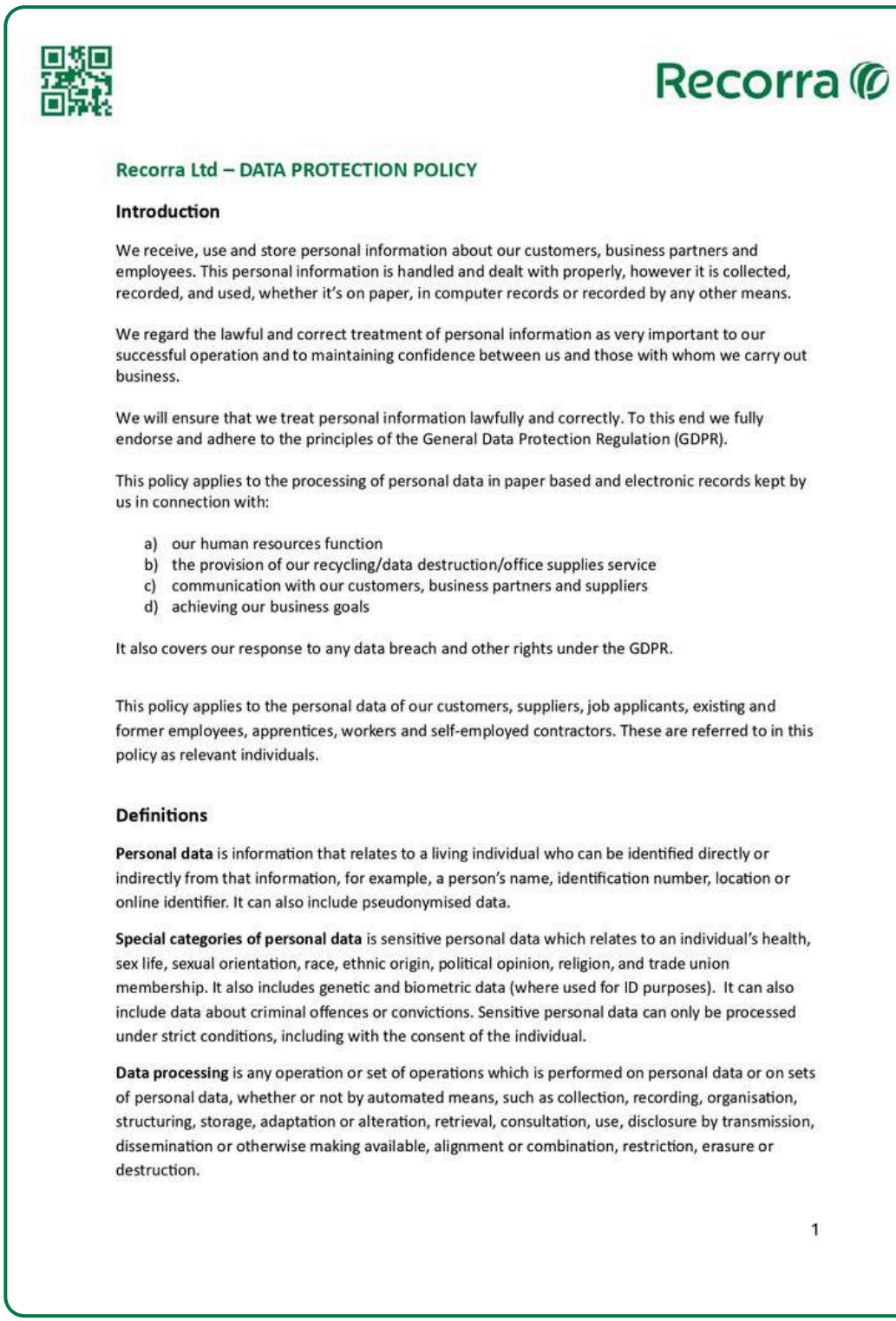
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MANAGING DIRECTOR

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Policies

Data Protection



Recorra

Recorra Ltd – DATA PROTECTION POLICY

Introduction

We receive, use and store personal information about our customers, business partners and employees. This personal information is handled and dealt with properly, however it is collected, recorded, and used, whether it's on paper, in computer records or recorded by any other means.

We regard the lawful and correct treatment of personal information as very important to our successful operation and to maintaining confidence between us and those with whom we carry out business.

We will ensure that we treat personal information lawfully and correctly. To this end we fully endorse and adhere to the principles of the General Data Protection Regulation (GDPR).

This policy applies to the processing of personal data in paper based and electronic records kept by us in connection with:

a) our human resources function
b) the provision of our recycling/data destruction/office supplies service
c) communication with our customers, business partners and suppliers
d) achieving our business goals

It also covers our response to any data breach and other rights under the GDPR.

This policy applies to the personal data of our customers, suppliers, job applicants, existing and former employees, apprentices, workers and self-employed contractors. These are referred to in this policy as relevant individuals.

Definitions

Personal data is information that relates to a living individual who can be identified directly or indirectly from that information, for example, a person's name, identification number, location or online identifier. It can also include pseudonymised data.

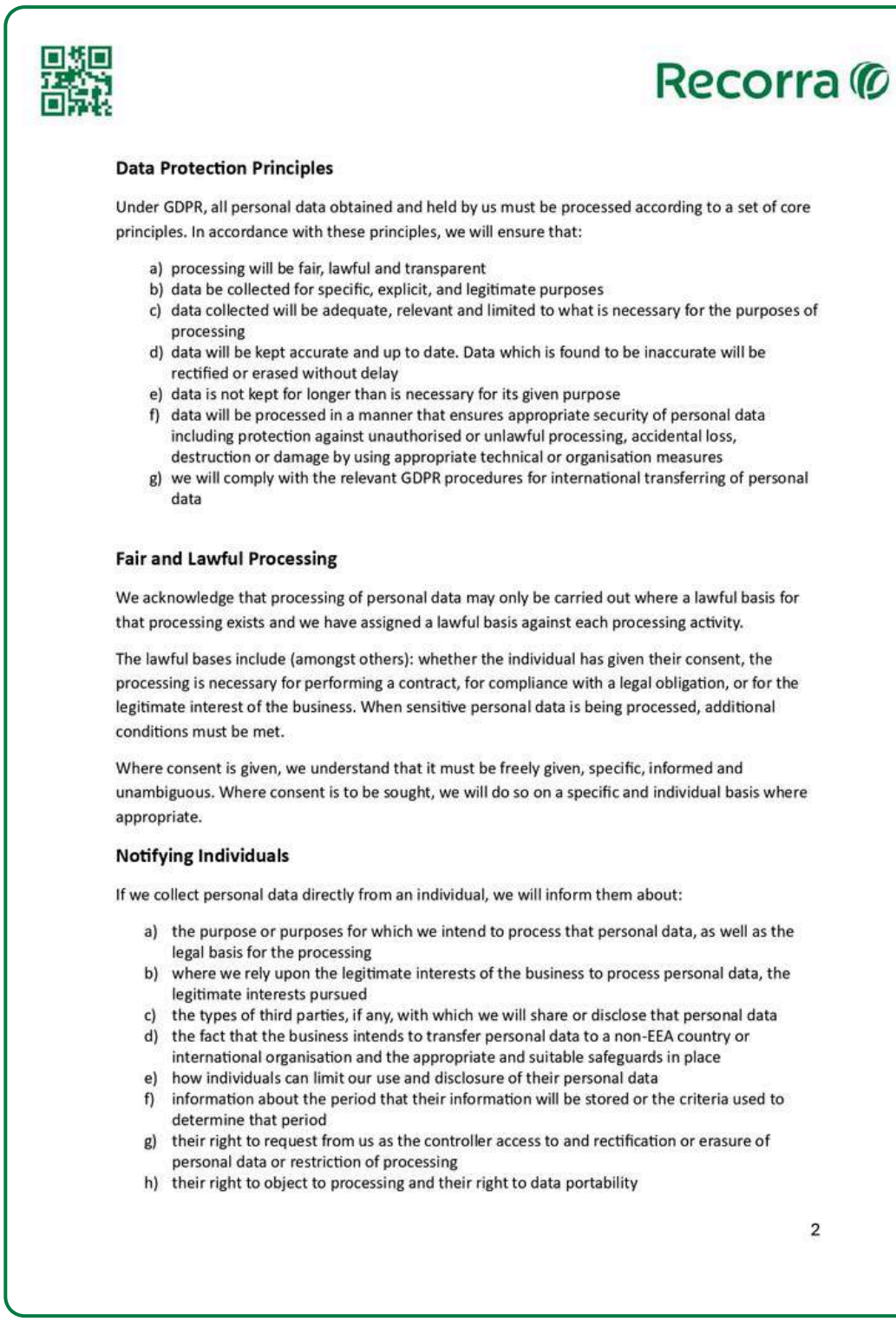
Special categories of personal data is sensitive personal data which relates to an individual's health, sex life, sexual orientation, race, ethnic origin, political opinion, religion, and trade union membership. It also includes genetic and biometric data (where used for ID purposes). It can also include data about criminal offences or convictions. Sensitive personal data can only be processed under strict conditions, including with the consent of the individual.

Data processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

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Policies

Data Protection



Recorra

Data Protection Principles

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

a) processing will be fair, lawful and transparent
b) data be collected for specific, explicit, and legitimate purposes
c) data collected will be adequate, relevant and limited to what is necessary for the purposes of processing
d) data will be kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
e) data is not kept for longer than is necessary for its given purpose
f) data will be processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
g) we will comply with the relevant GDPR procedures for international transferring of personal data

Fair and Lawful Processing

We acknowledge that processing of personal data may only be carried out where a lawful basis for that processing exists and we have assigned a lawful basis against each processing activity.

The lawful bases include (amongst others): whether the individual has given their consent, the processing is necessary for performing a contract, for compliance with a legal obligation, or for the legitimate interest of the business. When sensitive personal data is being processed, additional conditions must be met.

Where consent is given, we understand that it must be freely given, specific, informed and unambiguous. Where consent is to be sought, we will do so on a specific and individual basis where appropriate.

Notifying Individuals

If we collect personal data directly from an individual, we will inform them about:

a) the purpose or purposes for which we intend to process that personal data, as well as the legal basis for the processing
b) where we rely upon the legitimate interests of the business to process personal data, the legitimate interests pursued
c) the types of third parties, if any, with which we will share or disclose that personal data
d) the fact that the business intends to transfer personal data to a non-EEA country or international organisation and the appropriate and suitable safeguards in place
e) how individuals can limit our use and disclosure of their personal data
f) information about the period that their information will be stored or the criteria used to determine that period
g) their right to request from us as the controller access to and rectification or erasure of personal data or restriction of processing
h) their right to object to processing and their right to data portability

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Policies

Data Protection



Recorra

i) their right to withdraw their consent at any time (if consent was given) without affecting the lawfulness of the processing before the consent was withdrawn
j) the right to lodge a complaint with the Information Commissioners Office
k) other sources where personal data regarding the individual originated from and whether it came from publicly accessible sources
l) whether the provision of the personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the individual is obliged to provide the personal data and any consequences of failure to provide the data
m) the existence of automated decision-making, including profiling and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the individual

If we receive personal data about an individual from other sources, we will provide them with this information as soon as possible (in addition to telling them about the categories of personal data concerned) but at the latest within one month.

We will also inform individuals whose personal data we process that we are the data controller with regard to that data, our contact details and the name of the member of staff responsible for compliance in respect of our Data Protection Activities.

Types of Data Held

In carrying out our business activities, we may collect and process data from our clients, business partners and suppliers for the legitimate purpose of providing a recycling/data destruction/ office supplies service, or to provide relevant information about the benefits of our services and waste, recycling and sustainability.

Personal data collected from our clients, business partners and suppliers is limited to the following:

a) contact name
b) work email address
c) work phone number
d) job title

In addition, we keep several categories of personal data on our employees in order to carry out effective and efficient HR processes. For example:

a) personal details such as name, address, phone numbers
b) information gathered via the recruitment process such as that entered into a CV or included in a CV cover letter, references from former employers, details on your education and employment history etc
c) details relating to pay administration such as National Insurance numbers, bank account details and tax codes
d) medical or health information
e) information relating to employment with us, including:
   i) job title and job descriptions
   ii) salary
   iii) terms and conditions of employment

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Policies

Data Protection



Recorra

iv) details of formal and informal proceedings, annual leave records and performance information
v) training undertaken

All of the above information is required for our processing activities.

Rights of Individuals

All personal data will be processed in line with the individual's rights. These are:

a) the right to be informed about the data we hold about them and what we do with it
b) the right of access to the data we hold. More information on this can be found in the section headed "Access to Data" below
c) the right for any inaccuracies in the data we hold about them, however they come to light, to be corrected. This is also known as 'rectification'
d) the right to have data deleted in certain circumstances. This is also known as 'erasure'
e) the right to restrict the processing of the data
f) the right to transfer the data we hold about them to another party. This is also known as 'portability'
i. the right to object to the inclusion of any information
ii. the right to regulate any automated decision-making and profiling of personal data

Responsibilities

In order to protect the personal data of relevant individuals, those within our business who must process data as part of their role have been made aware of our policies on data protection.

We have also appointed employees with responsibility for reviewing and auditing our data protection systems.

Access to Data

As stated above, individuals have a right to access the personal data that we hold on them. To exercise this right, individuals should make a **Subject Access Request**. We will comply with the request without delay, and within one month unless, in accordance with legislation, we decide that an extension is required. Those who make a request will be kept fully informed of any decision to extend the time limit.

No charge will be made for complying with a request unless the request is manifestly unfounded, excessive or repetitive, or unless a request is made for duplicate copies to be provided to parties other than the individual making the request. In these circumstances, a reasonable charge will be applied.

Further information on making a subject access request is contained in our Subject Access Request policy.

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Data Protection



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Disclosure and Sharing of Personal Data

We may share personal data we hold with other Recorra companies (this means our subsidiaries, as defined in section 1159 of the UK Companies Act 2006). In addition, we may be required to disclose certain data/information to any person. The circumstances leading to such disclosures include:

a. providing customer contact details to sub-contractors in order to perform the service
b. any employee benefits operated by third parties
c. disabled individuals - whether any reasonable adjustments are required to assist them at work
d. individuals' health data - to comply with health and safety or occupational health obligations towards the employee
e. for Statutory Sick Pay purposes
f. HR management and administration - to consider how an individual's health affects his or her ability to do their job
g. the smooth operation of any employee insurance policies or pension plans
h. to assist law enforcement or a relevant authority to prevent or detect crime or prosecute offenders or to assess or collect any tax or duty

These kinds of disclosures will only be made when strictly necessary for the purpose.

Data Security

We will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental or unlawful destruction, damage, loss, alteration, unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed.

We will maintain data security by protecting the confidentiality, integrity and availability of personal data and will put in place procedures and technologies to maintain the security of all personal data from the point of the determination of the means for processing and point of data collection to the point of destruction. Employees are trained to follow the Company's rules on data security.

All our employees are aware that hard copy personal information should be kept in a locked filing cabinet, drawer, or safe.

Employees are aware of their roles and responsibilities when their role involves the processing of data. All employees are instructed to store files or written information of a confidential nature in a secure manner so they are only accessed by people who have a need and a right to access them and to ensure that screen locks are implemented on all PCs, laptops etc when unattended. No files or written information of a confidential nature are to be left where they can be read by unauthorised people.

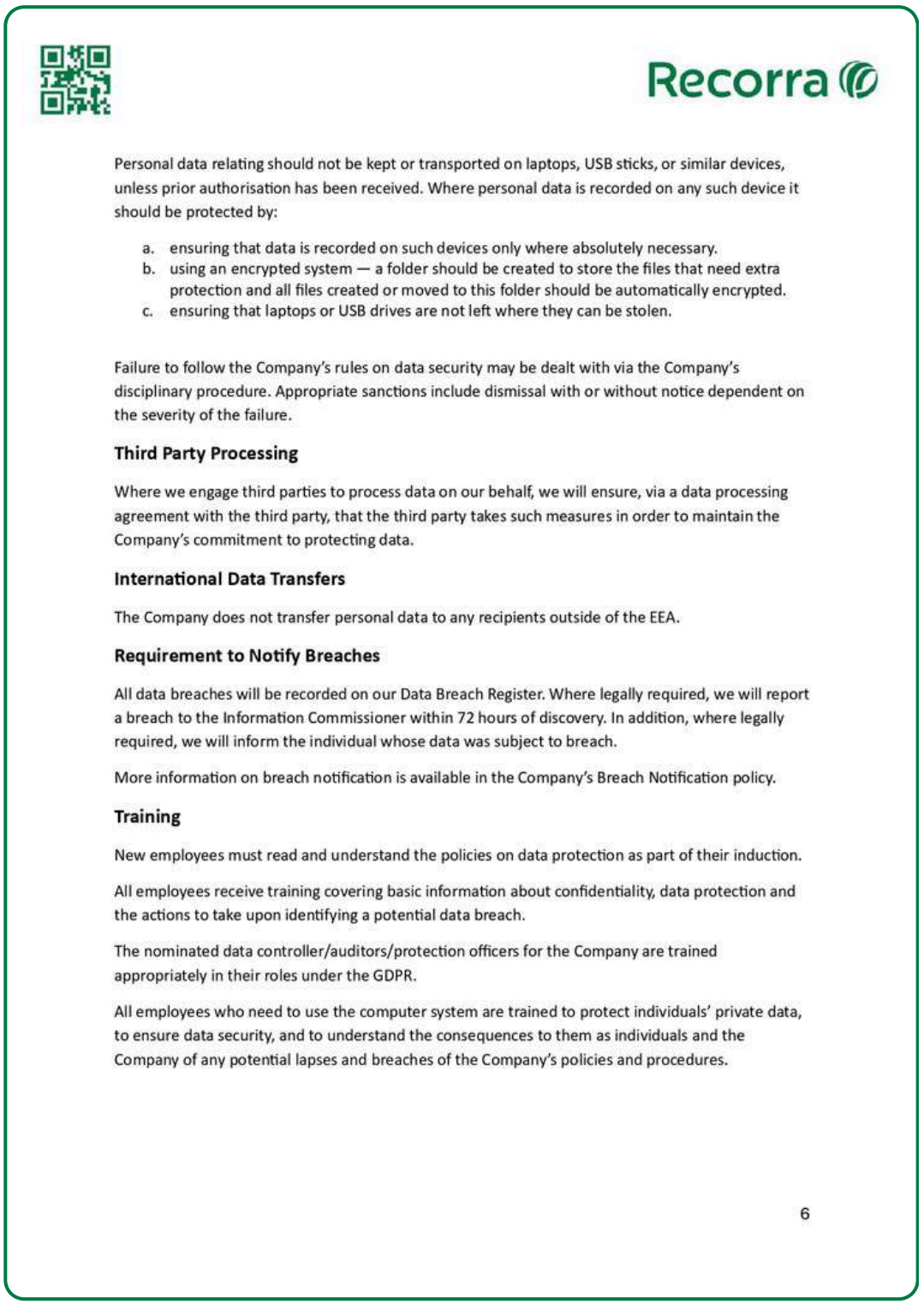
Where data is computerised, it should be coded, encrypted or password protected both on a local hard drive and on a network drive that is regularly backed up. If a copy is kept on removable storage media, that media must itself be kept in a locked filing cabinet, drawer, or safe.

Employees must always use the passwords provided to access the computer system and not abuse them by passing them on to people who should not have them.

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Policies

Data Protection



Recorra

Personal data relating should not be kept or transported on laptops, USB sticks, or similar devices, unless prior authorisation has been received. Where personal data is recorded on any such device it should be protected by:

a. ensuring that data is recorded on such devices only where absolutely necessary.
b. using an encrypted system — a folder should be created to store the files that need extra protection and all files created or moved to this folder should be automatically encrypted.
c. ensuring that laptops or USB drives are not left where they can be stolen.

Failure to follow the Company's rules on data security may be dealt with via the Company's disciplinary procedure. Appropriate sanctions include dismissal with or without notice dependent on the severity of the failure.

Third Party Processing

Where we engage third parties to process data on our behalf, we will ensure, via a data processing agreement with the third party, that the third party takes such measures in order to maintain the Company's commitment to protecting data.

International Data Transfers

The Company does not transfer personal data to any recipients outside of the EEA.

Requirement to Notify Breaches

All data breaches will be recorded on our Data Breach Register. Where legally required, we will report a breach to the Information Commissioner within 72 hours of discovery. In addition, where legally required, we will inform the individual whose data was subject to breach.

More information on breach notification is available in the Company's Breach Notification policy.

Training

New employees must read and understand the policies on data protection as part of their induction.

All employees receive training covering basic information about confidentiality, data protection and the actions to take upon identifying a potential data breach.

The nominated data controller/auditors/protection officers for the Company are trained appropriately in their roles under the GDPR.

All employees who need to use the computer system are trained to protect individuals' private data, to ensure data security, and to understand the consequences to them as individuals and the Company of any potential lapses and breaches of the Company's policies and procedures.

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Policies

Data Protection



Recorra

Records

The Company keeps records of its processing activities including the purpose for the processing and retention periods in its Data Register. The Register will be kept up to date so that it reflects current processing activities.

Data Protection Compliance

Our appointed compliance officer in respect of our data protection activities is:

Lyndsay Edwards – **Compliance Director**

Telephone – 020 7407 9100

Email – Lyndsay.edwards@recorra.co.uk

Address – 52 Lant Street, London, SE1 1RB

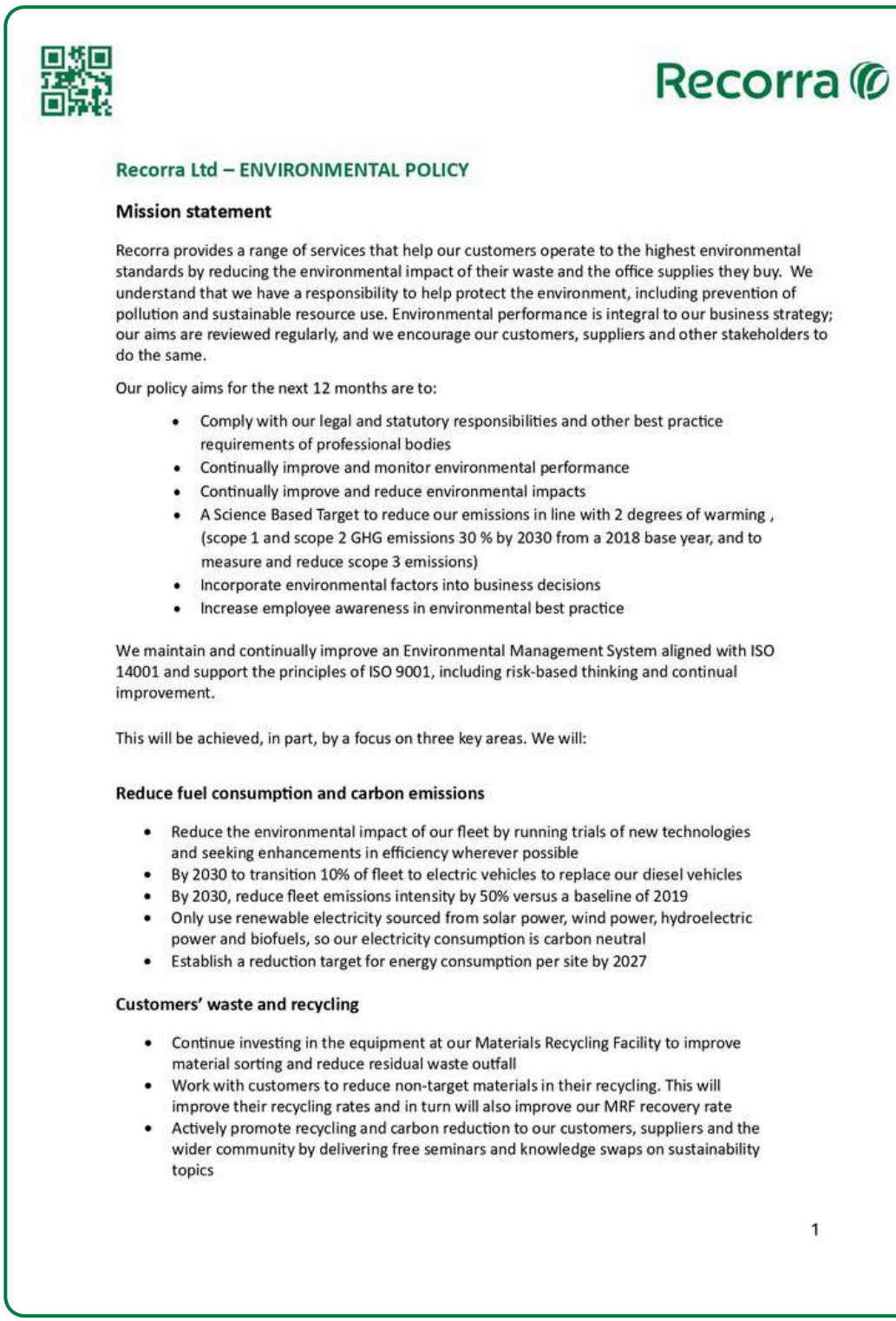
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MANAGING DIRECTOR

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Policies

Environmental



Recorra

Recorra Ltd – ENVIRONMENTAL POLICY

Mission statement

Recorra provides a range of services that help our customers operate to the highest environmental standards by reducing the environmental impact of their waste and the office supplies they buy. We understand that we have a responsibility to help protect the environment, including prevention of pollution and sustainable resource use. Environmental performance is integral to our business strategy; our aims are reviewed regularly, and we encourage our customers, suppliers and other stakeholders to do the same.

Our policy aims for the next 12 months are to:

- Comply with our legal and statutory responsibilities and other best practice requirements of professional bodies
- Continually improve and monitor environmental performance
- Continually improve and reduce environmental impacts
- A Science Based Target to reduce our emissions in line with 2 degrees of warming , (scope 1 and scope 2 GHG emissions 30 % by 2030 from a 2018 base year, and to measure and reduce scope 3 emissions)
- Incorporate environmental factors into business decisions
- Increase employee awareness in environmental best practice

We maintain and continually improve an Environmental Management System aligned with ISO 14001 and support the principles of ISO 9001, including risk-based thinking and continual improvement.

This will be achieved, in part, by a focus on three key areas. We will:

Reduce fuel consumption and carbon emissions

- Reduce the environmental impact of our fleet by running trials of new technologies and seeking enhancements in efficiency wherever possible
- By 2030 to transition 10% of fleet to electric vehicles to replace our diesel vehicles
- By 2030, reduce fleet emissions intensity by 50% versus a baseline of 2019
- Only use renewable electricity sourced from solar power, wind power, hydroelectric power and biofuels, so our electricity consumption is carbon neutral
- Establish a reduction target for energy consumption per site by 2027

Customers' waste and recycling

- Continue investing in the equipment at our Materials Recycling Facility to improve material sorting and reduce residual waste outfall
- Work with customers to reduce non-target materials in their recycling. This will improve their recycling rates and in turn will also improve our MRF recovery rate
- Actively promote recycling and carbon reduction to our customers, suppliers and the wider community by delivering free seminars and knowledge swaps on sustainability topics

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Environmental



- Work to improve the quality, accuracy and consistency of the sustainability data we report and mirror mandatory GHG reporting requirements

Increase employee awareness in environmental best practice

- Raise awareness internally through our Sustainability and Wellness Action Group; educating staff at all our sites so they understand the link between our business activities and their environmental impact
- Continue to train all drivers to improve fuel efficiency and introduce incentives to maintain gains in these targets and reduce the carbon intensity of our fleet operations

We communicate our Environmental Policy to customers and suppliers via our website, so that it is available to all stakeholders.

This policy is reviewed on an annual basis by our management team.

Signed: Date: 01/04/2026

MANAGING DIRECTOR

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Policies

Equal Opportunities



Recorra

Recorra Ltd – EQUAL OPPORTUNITIES POLICY

Our Commitment

We are committed to the achievement of equal opportunities; this is central to our mission.

We recognise and accept our responsibilities under the under the Equality Act 2010. It is unlawful to discriminate directly or indirectly in recruitment or employment because of any of the nine *"protected characteristics"* as defined by the Act. These are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

We also recognise that the Equality Act 2010 makes it unlawful for staff to discriminate directly or indirectly or harass customers or clients because of the protected characteristics of disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation in the provision goods and services. Although discrimination in goods and services because of age is not yet covered by the Equality Act 2010, Recorra includes it as a matter of good practice.

- We believe discrimination, either direct or indirect as defined in law, is unacceptable and we will not tolerate it.
- We will not tolerate discrimination or harassment against an individual because they are associated with another individual who has a protected characteristic.
- We will not tolerate discrimination or harassment against an individual on a perception that he or she has a particular protected characteristic.
- We will not tolerate discrimination or harassment of any of our employees by third parties such as clients or customers.
- We will not tolerate the victimisation of any employee because he or she made or supported a complaint or raised a grievance under the Equality Act 2010, or because he or she is suspected of doing so, or being about to do so.

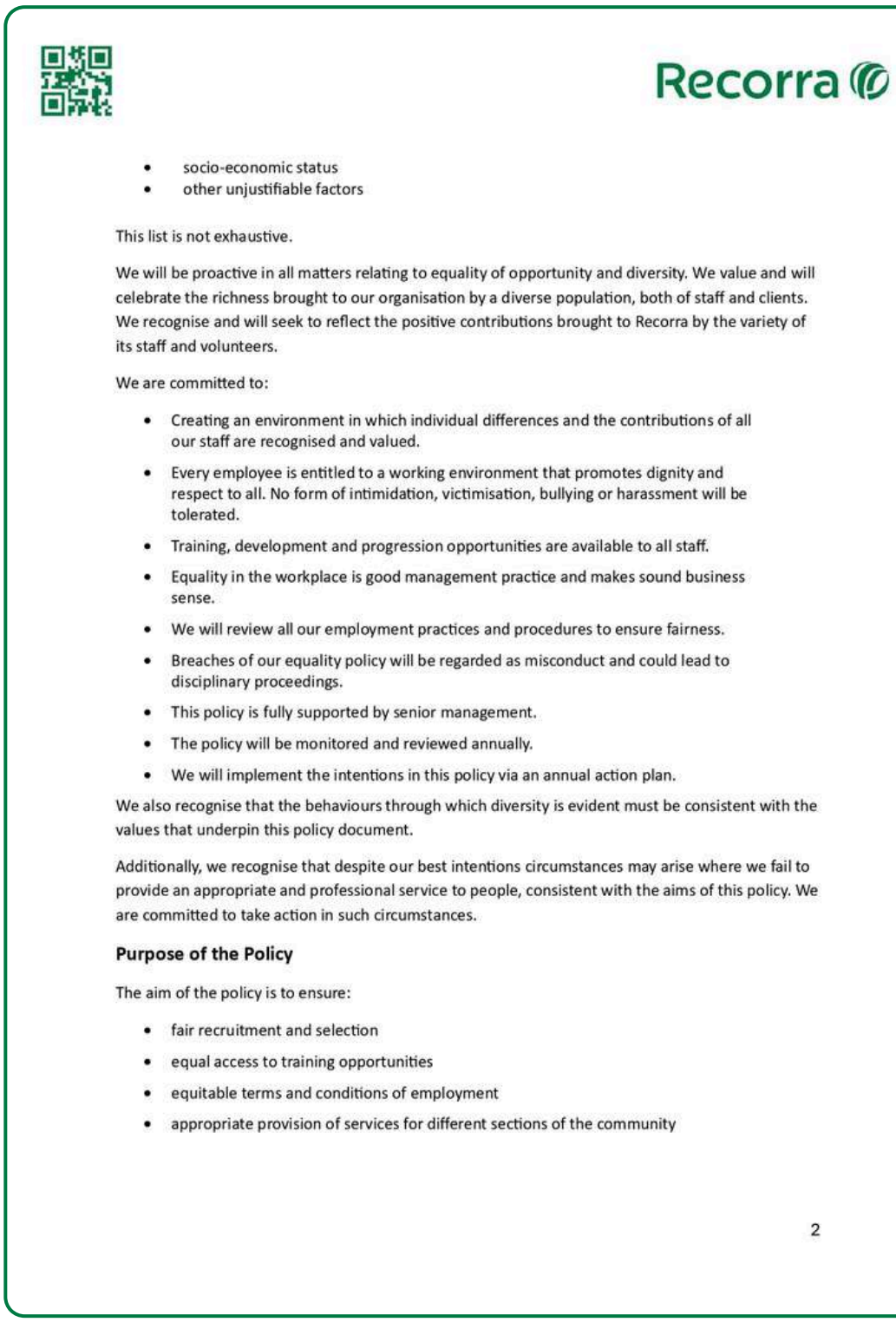
However, our policy is not limited to the minimum standards imposed by the law. We are committed to achieve best practice in the area of equal opportunities. Everyone who is or who seeks to be a member of staff or volunteer of Recorra is entitled to receive equality of opportunity and treatment that is appropriate and fair irrespective of:

- age
- colour
- disablement
- marital status
- race/ethnicity
- religion
- sex
- gender
- employment status
- sexual orientation
- nationality
- caring responsibility

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Policies

Equal Opportunities



- socio-economic status
- other unjustifiable factors

This list is not exhaustive.

We will be proactive in all matters relating to equality of opportunity and diversity. We value and will celebrate the richness brought to our organisation by a diverse population, both of staff and clients. We recognise and will seek to reflect the positive contributions brought to Recorra by the variety of its staff and volunteers.

We are committed to:

- Creating an environment in which individual differences and the contributions of all our staff are recognised and valued.
- Every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, victimisation, bullying or harassment will be tolerated.
- Training, development and progression opportunities are available to all staff.
- Equality in the workplace is good management practice and makes sound business sense.
- We will review all our employment practices and procedures to ensure fairness.
- Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings.
- This policy is fully supported by senior management.
- The policy will be monitored and reviewed annually.
- We will implement the intentions in this policy via an annual action plan.

We also recognise that the behaviours through which diversity is evident must be consistent with the values that underpin this policy document.

Additionally, we recognise that despite our best intentions circumstances may arise where we fail to provide an appropriate and professional service to people, consistent with the aims of this policy. We are committed to take action in such circumstances.

Purpose of the Policy

The aim of the policy is to ensure:

- fair recruitment and selection
- equal access to training opportunities
- equitable terms and conditions of employment
- appropriate provision of services for different sections of the community

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Policies

Equal Opportunities



Recorra

Scope of the Policy

Recorra seeks to ensure equality of opportunity and treatment in relation to all of its activities, both as an employer and as a service provider.

As an employer we will seek to ensure equality of opportunity and treatment in the recruitment, selection, retention, training and promotion of staff at all levels, and the adoption of flexible patterns of working. To this end we will develop personnel policies and practices that will demonstrate and further our commitment to Equal Opportunities.

Selection criteria and procedures will be designed, and outcomes monitored and reviewed, to ensure that staff are recruited and selected on the basis of their assessed merits and abilities when compared with the needs of Recorra. We will take care to ensure that applicants or potential applicants are not discouraged or disadvantaged by the adoption of any conditions or criteria which cannot be justified in terms of specific job requirements. Additionally, we will seek to attract, encourage and welcome applications from a wide range of people to enhance the diversity of our staff.

These commitments to staff will be reflected in the policies we produce.

Additionally, we will continue to develop and implement best practice through the establishment of and support for guidance notes on best practice. The development of these guidance notes will take account of relevant statutory Codes of Practice.

Implementation

Recorra will have policies and procedures that support and uphold this Equal Opportunities Policy. As a result, everyone can expect to be treated with fairness and for judgements to be made that respect their human rights and ensure natural justice. Decisions will be made with integrity following a process based upon transparent criteria.

Recorra will take action to communicate this policy to all staff, volunteers and others e.g. visitors, clients, contractors and suppliers of goods and services involved in its activities. We will continue to develop and implement programmes to ensure that all staff have received appropriate training to enable them to fulfil their responsibilities under this policy.

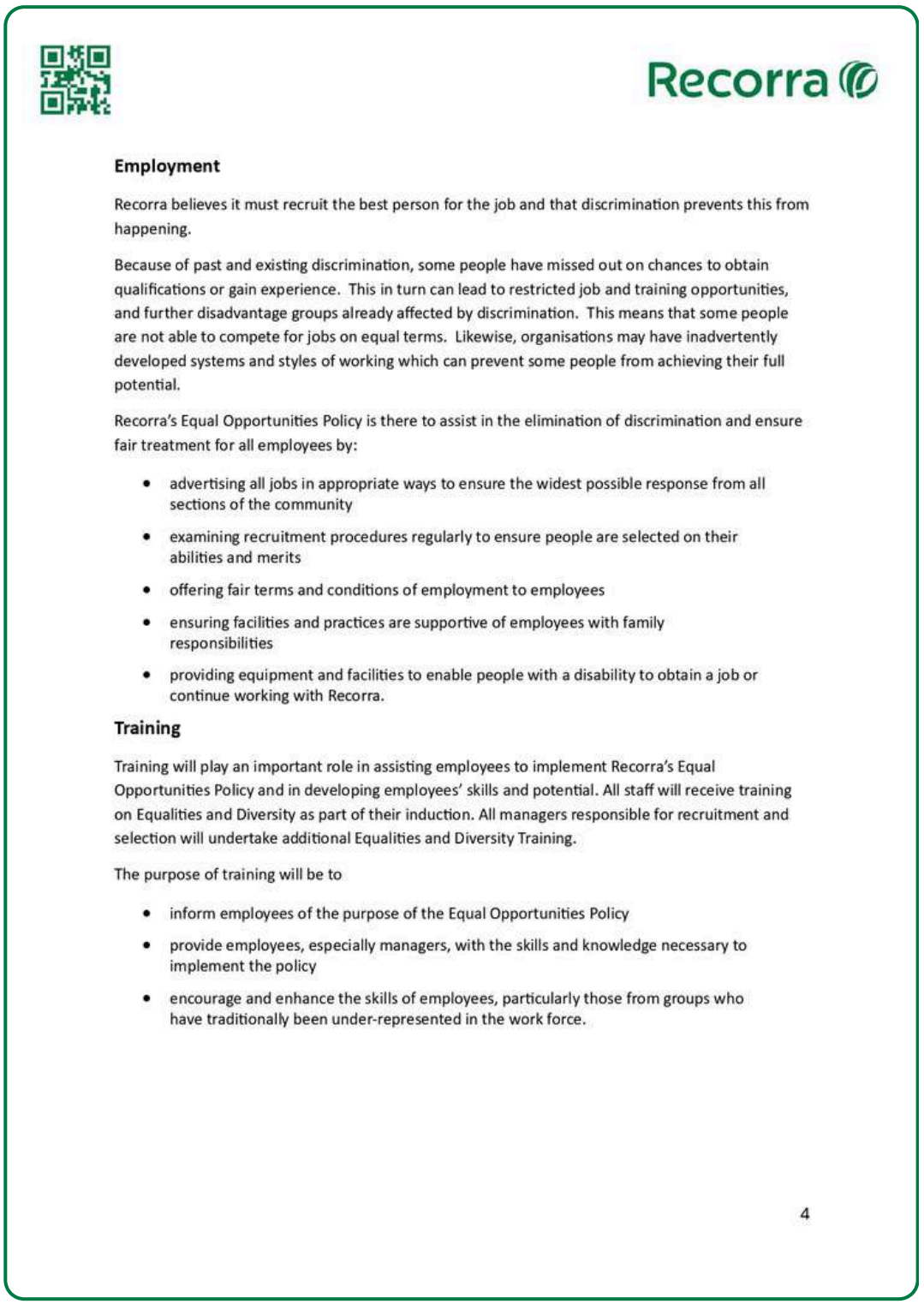
Consultation with and involvement of a wide range of stakeholders will be essential for ensuring that our equal opportunities policy and practice is effective. We also need to ensure that we gain feedback to ensure that the practical impact of our policy and practice does not result in unintended or unfair discrimination or in consequences that are contrary to the aims of this policy.

Recorra will develop policies, codes of practice and guidance to deal with specific aspects of the implementation of this Policy. These developments will take place against a clear and published action plan.

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Policies

Equal Opportunities



Recorra

Employment

Recorra believes it must recruit the best person for the job and that discrimination prevents this from happening.

Because of past and existing discrimination, some people have missed out on chances to obtain qualifications or gain experience. This in turn can lead to restricted job and training opportunities, and further disadvantage groups already affected by discrimination. This means that some people are not able to compete for jobs on equal terms. Likewise, organisations may have inadvertently developed systems and styles of working which can prevent some people from achieving their full potential.

Recorra's Equal Opportunities Policy is there to assist in the elimination of discrimination and ensure fair treatment for all employees by:

- advertising all jobs in appropriate ways to ensure the widest possible response from all sections of the community
- examining recruitment procedures regularly to ensure people are selected on their abilities and merits
- offering fair terms and conditions of employment to employees
- ensuring facilities and practices are supportive of employees with family responsibilities
- providing equipment and facilities to enable people with a disability to obtain a job or continue working with Recorra.

Training

Training will play an important role in assisting employees to implement Recorra's Equal Opportunities Policy and in developing employees' skills and potential. All staff will receive training on Equalities and Diversity as part of their induction. All managers responsible for recruitment and selection will undertake additional Equalities and Diversity Training.

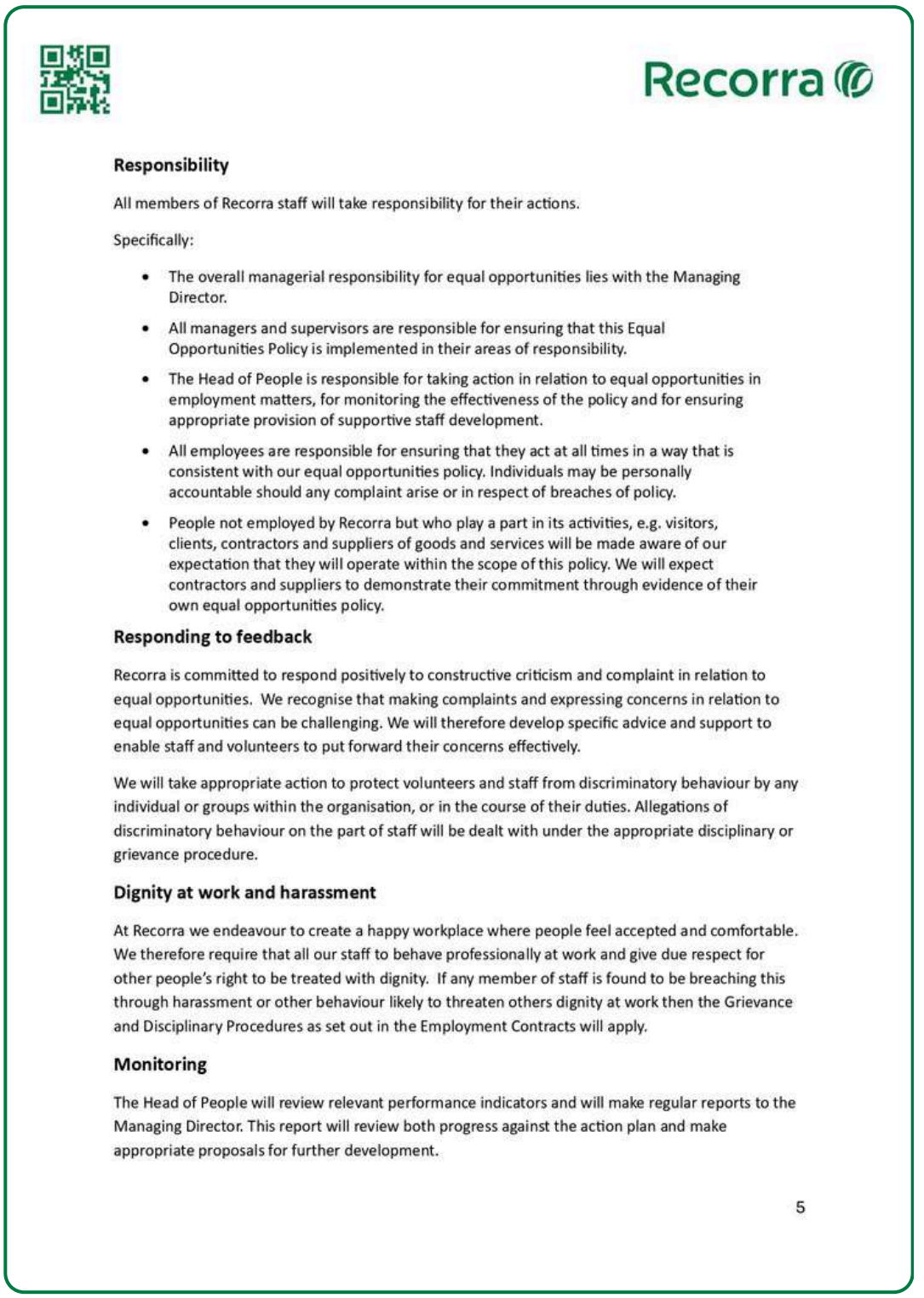
The purpose of training will be to

- inform employees of the purpose of the Equal Opportunities Policy
- provide employees, especially managers, with the skills and knowledge necessary to implement the policy
- encourage and enhance the skills of employees, particularly those from groups who have traditionally been under-represented in the work force.

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Policies

Equal Opportunities



Recorra

Responsibility

All members of Recorra staff will take responsibility for their actions.

Specifically:

- The overall managerial responsibility for equal opportunities lies with the Managing Director.
- All managers and supervisors are responsible for ensuring that this Equal Opportunities Policy is implemented in their areas of responsibility.
- The Head of People is responsible for taking action in relation to equal opportunities in employment matters, for monitoring the effectiveness of the policy and for ensuring appropriate provision of supportive staff development.
- All employees are responsible for ensuring that they act at all times in a way that is consistent with our equal opportunities policy. Individuals may be personally accountable should any complaint arise or in respect of breaches of policy.
- People not employed by Recorra but who play a part in its activities, e.g. visitors, clients, contractors and suppliers of goods and services will be made aware of our expectation that they will operate within the scope of this policy. We will expect contractors and suppliers to demonstrate their commitment through evidence of their own equal opportunities policy.

Responding to feedback

Recorra is committed to respond positively to constructive criticism and complaint in relation to equal opportunities. We recognise that making complaints and expressing concerns in relation to equal opportunities can be challenging. We will therefore develop specific advice and support to enable staff and volunteers to put forward their concerns effectively.

We will take appropriate action to protect volunteers and staff from discriminatory behaviour by any individual or groups within the organisation, or in the course of their duties. Allegations of discriminatory behaviour on the part of staff will be dealt with under the appropriate disciplinary or grievance procedure.

Dignity at work and harassment

At Recorra we endeavour to create a happy workplace where people feel accepted and comfortable. We therefore require that all our staff to behave professionally at work and give due respect for other people's right to be treated with dignity. If any member of staff is found to be breaching this through harassment or other behaviour likely to threaten others dignity at work then the Grievance and Disciplinary Procedures as set out in the Employment Contracts will apply.

Monitoring

The Head of People will review relevant performance indicators and will make regular reports to the Managing Director. This report will review both progress against the action plan and make appropriate proposals for further development.

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Policies

Equal Opportunities



- Equality monitoring will be carried out to measure the effectiveness of the Recorra's Equal Opportunities Policy, to check the policy is working and act as a basis for future plans. Monitoring information will only be used for this purpose and will be treated confidentially.
- We will maintain and review the employment records of all employees in order to monitor the progress of this policy.
- We will monitor recruitment and selection procedures to ensure discrimination is not occurring.

This policy will be reviewed on an annual basis.

Signed: Date: 01/04/2026

MANAGING DIRECTOR

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Policies

Ethical



Recorra

Recorra Ltd – ETHICAL POLICY

BACKGROUND

Recorra's code of ethics requires compliance with English law. Our standards go beyond the legal minimum and require a high level of conduct. Recorra's employees are expected to comply with all laws affecting our business, and to act in every respect with honesty, fairness and integrity. The ethical code described should be regarded as more than a set of rules. It is a statement of beliefs that should guide employees' conduct in most situations. You can resolve most ethical questions in your workplace by taking time to consider whether you are acting fairly and honestly towards your fellow employees, the customer, suppliers and general public who rely on our company.

ETHICAL GUIDELINES

Positive Responsibilities

Each Recorra employee has an individual responsibility to deal ethically with our customers and suppliers, fellow employees and the general public. All employees are expected to do more than merely avoid unethical conduct; they must also take the initiative and assume positive responsibilities for quality, honesty and fairness.

Employees are expected to raise ethical concerns and report any actual or suspected ethical misconduct to their line manager or any Director as appropriate. Honesty also requires that employees refuse to participate either actively or passively in any cover-up of such misconduct. Each employee is expected to co-operate fully in any investigation of ethical matters by Recorra. 'Looking the other way' on potential ethical questions is in direct contradiction to Recorra's commitment to honesty and integrity and is not acceptable.

Conflicts of Interest

Employees, their spouses and other close family members are expected to avoid outside interests or activities that could be advanced at the expense of Recorra's interests. Such involvement may divide an employee's loyalty between Recorra and the outside interest and create a potential conflict of interest. Non-Recorra business involvement with a competitor, supplier or customer is strictly prohibited. Such interest could affect an employee's objectivity in the promotion of Recorra interests.

Employees may not work for or provide advice or consulting services to a competitor, supplier or customer. Employees should not run any side business in their free time which will compete with, sell to, or buy from Recorra and should avoid any financial investments in competitors, suppliers or customers, other than nominal investments in public companies.

Receipt of Gifts

Gifts from suppliers, customers or competitors to Recorra employees raise the appearance, if not the reality, of dishonest or unfair dealings. It is Recorra's policy that all business decisions be made impartially and fairly, and not on the basis of gratuities offered to employees. No employee, or any of their family, may solicit or receive favours, gifts, loans or other benefits (including service and discounts as well as material goods) from any supplier, customer or competitor. The only exception to this policy is for casual entertainment or gifts (other than money) of nominal value which are customarily offered to others having a similar relationship with the supplier, customer or competitor. Recorra employees should exercise good judgement in deciding whether to accept a gift

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Policies

Ethical



of nominal value or casual entertainment and should resolve all doubts and questions in favour of declining to accept the offer.

Use of Recorra Resources

Each of us has a responsibility to use Recorra resources, including time, materials, equipment and proprietary information for Recorra business purposes only and not for personal benefit. Any such personal use, without proper permission, amounts to theft. Recorra property, such as vehicles, equipment and tools, office materials and facilities, are not to be used by employees other than for Recorra purposes. Use of such property in connection with community or employee social or personal activities may be authorised only by your line manager or a member of the Senior Management team.

All employee requests for reimbursement from Recorra whether for travel expenses, entertainment or other business-related items must be legitimate, properly documented and in accordance with policy.

All employees receive Recorra's business and technical information and know-how in trust and are expected to maintain such information in confidence and not disclose or use it other than for Recorra business and for Recorra benefit. This information includes, for example, names of customers, suppliers, employees, manufacturing processes and equipment, plant layout, engineering drawings, product development plans, information systems, business plans, financial and marketing information and all documents and data which relate to such items. All of Recorra's business and technical information and know-how is a part of the value of the Recorra. Employees are expected actively to protect these assets. Persons who use any of this information for their own personal gain or give or sell this information to outsiders will be dismissed and may be subject to prosecution.

Entertainment and Gratuities

Recorra believes that business decisions by its customers should be made solely on the basis of Recorra's quality, service, price and other competitive factors. Gifts and entertainment of nominal value are used to create goodwill with Recorra customers. If they go beyond this and make the customer feel obligated to offer any special consideration to Recorra, they are unacceptable. Recorra's policy is to avoid even the appearance of favouritism based on business entertainment or gratuities.

Employees should exercise good judgement and moderation and should offer gratuities to customers only to the extent they are in accordance with reasonable customs in the marketplace. Special consideration must be given in the case of gifts or entertainment offered to government employees. These rules may also apply to government prime contractors. Where there is any doubt about the standards prevailing, no gifts should be made.

Normal and reasonable entertainment of non-governmental customers and suppliers covered by standard expense account reporting is permissible when not contrary to applicable law or to the non-governmental customer's or supplier's own policy.

Payments to Third Parties

Payments should be made by Recorra to third parties only for services or products properly provided to Recorra. No Recorra employee shall make any direct or indirect payment in the nature of a bribe or payoff to secure or maintain business or for any other purpose to any government employee or the personnel of any customer, supplier or competitor.

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Ethical



In order to avoid even the appearance of improper payments, no payments are to be made by Recorra in cash, other than documented petty cash disbursements. No cheques are to be written to 'cash', 'bearer', or third-party designees of the person entitled to payment. Cash payments may never be made to employees of competitors, suppliers, customers or government agencies.

Payments to employees, agents, consultants or others outside their country of residence are prohibited where they violate the laws of that country.

Marketing Practices

Recorra's policy is to comply with all competition and trade regulation laws and to use only ethical and proper methods to market Recorra products. All Recorra customers will be treated fairly and even-handedly, and no preferential trade terms or other treatment will be extended to any customer in violation of any law. To avoid the appearance of improper action, Recorra absolutely prohibits consultations with competitors regarding prices, customers or territories. Commissions and other payments must be adequately documented and reported to government authorities as required. Advertising must always be in good taste and all claims made in advertisements must be fully supportable.

Environmental Protection

Recorra fully supports the belief that each of us has a responsibility to protect the environment and human health. It is imperative that each Recorra employee accepts responsibility for the observance of laws and regulations governing the protection of the environment and human health. No individual will knowingly buy for use at Recorra, or dispose of, other than in accordance with the law, any chemical or other substance which is illegal. Managers are expected to keep up to date with all relevant laws and regulations concerning the protection of the environment, to seek professional guidance when necessary, and to assure observation of the laws and regulations. Recorra will continue to seek alternatives to hazardous methods, substances or products to assure protection of the environment and personal safety.

Individuals who knowingly violate any environmental law or regulation will be subject to dismissal. Accidental incidents which affect the environment are to be reported immediately to the appropriate outside authorities as well as to senior management.

Responsibilities to Employees

Recorra believes that all of its employees should have a safe workplace and equal opportunities for promotion and advancement. Recorra will comply with all health, safety and equal opportunities legislation and other similar laws and regulations. Recorra is committed to maintaining safe working conditions in all its facilities. Employees are expected to assume individual responsibility for safety procedures, following all necessary precautions, avoiding any activity that might endanger themselves or fellow employees, and notifying supervisors and management of any potentially dangerous conditions in the workplace. Management and supervisors are expected to promptly correct any serious safety hazards and to stop any activity involved until the hazard has been corrected.

Recorra's policy is that all its employees will enjoy a work environment free from sexual harassment. Sexual harassment it totally unacceptable and will not be tolerated. Sexual harassment includes unwelcome sexual advances or requests for sexual favours and the creation of an intimidating, hostile or offensive work environment through unwelcome sexual conversations, advances, jokes or suggestive objects or pictures. Any complaint of sexual harassment will be immediately investigated and appropriate action, which may include dismissal, taken.

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Policies

Ethical



Recorra

Use of Alcohol and Drugs

Recorra is strongly committed to the prevention of illegal activities, and to the protection of its employees, property and the public, from any danger which might result from the use of drugs or alcohol. It is Recorra's policy to provide a safe drug-free and alcohol-free work environment.

In the workplace, drug and alcohol abuse can create hazardous situations, lower productivity and can cause potential problems with third parties with whom Recorra does business. We must ensure we maintain the reputation of Recorra and its people as good, responsible citizens.

Use or possession of illegal drugs or alcohol during working hours or on Recorra premises is strictly forbidden and is cause for discipline up to and including dismissal. Employees reporting to work under the influence of drugs or alcohol are subject to discipline up to and including dismissal.

It is Recorra's policy to provide assistance to employees who seek the Company's help in overcoming any addiction to or dependence upon alcohol or drugs. Volunteering to participate in an employee assistance programme will not necessarily prevent disciplinary action for violations of the policy which have already occurred.

Reporting Practices and Financial Information

Whilst honest differences of opinion are expected, and can indeed be useful in examining all sides of an issue, we must base our action on facts, logic and fair play. We cannot use shaded opinions or distorted facts to justify actions, nor should we allow facts or opinions to be covered up to make a situation look different from what it really is. All reporting at all levels throughout the company must be factual and open.

Recorra's business integrity will be reflected in accurate and complete accounts and records. Employees are responsible for ensuring the accuracy and reliability of Recorra's accounts. Fictitious, improper, deceptive, undisclosed or unrecorded accounts of funds or assets are a serious ethical abuse and illegal. It is Recorra's policy that all accounts and records conform to accepted accounting principles and to all applicable laws and regulations.

All transactions must be accurately documented and accounted for in Recorra's accounts and records. All entries must contain appropriate descriptions of the underlying transactions and no false or deceptive entries shall be made. No employee shall enter into any transaction with the understanding that it is other than as described in the supporting documentation. No employee shall participate in obtaining or creating false invoices, payroll records or other misleading documentation or inventing or using fictitious entities, sales, purchases, services, loans or other financial arrangements for any purpose. Recorra will not maintain or use any anonymous ('numbered') bank account or other account that does not identify Recorra's ownership.

Product Integrity

Strict product integrity is necessary for Recorra to achieve its quality objectives and to maintain its reputation for quality products. It is Recorra's policy never to wilfully conceal defective work or material, falsify records or make false certification or claims regarding its products. In some instances, particularly in connection with government contracts or subcontracts, it is necessary for employees to make specific product certifications, generate records and supply other information or statements concerning product integrity. It is unlawful to intentionally falsify such records for the purpose of misleading or defrauding the government or any other customer.

All employees are responsible for ensuring the integrity of the products under their control and for the accuracy of the documentation supporting the product integrity. Incidents of suspected or

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Policies

Ethical

known concealment of defective work or material, or falsifications of records are to be immediately reported to management.

Industry Regulation

It is in all employees' interests to make a positive contribution to the reputation of our industry by supporting the industry's education and community relations programmes etc. as appropriate. Employees should also avoid all forms of publicity that will reflect negatively on the industry e.g. by refraining from disparaging or slandering our competitors and their products or services.

APPLICATION OF THE CODE

All employees are expected to be familiar with and to observe the ethical standards outlined in this code. Abuse of Recorra's ethical code may be grounds for dismissal and the abuser could be subject to legal action. Managers are responsible for ensuring the application of this ethical code by monitoring and enforcing the code within their areas. Application of the Code will be one of the performance standards by which all managers will be measured. All of Recorra's managers are expected to lead by example and communicate a real concern for the observance of these ethical guidelines.

PERSONAL RESPONSIBILITY

Each of us should take pride in the high standard of conduct that has always identified us as Recorra employees. Let us resolve together to continue to be a company which will tolerate nothing less than complete honesty, fairness and integrity in our dealings with all individuals, social groups, businesses and government institutions that depend on us.

Signed: Date: 01/04/2026

MANAGING DIRECTOR

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Policies

Health & Safety



Recorra

Recorra Ltd - HEALTH AND SAFETY POLICY STATEMENT

AIMS AND OBJECTIVES

This policy outlines Recorra's approach to safeguarding the health, safety and welfare of its employees, contractors and visitors whilst working at company premises, or whilst working elsewhere on behalf of the company.

Recorra is committed to:

- Providing a safe and healthy working environment so that employees and everyone associated with the company's operations, are protected from work related injury, illness or ill health, so far as is reasonably practicable
- Complying with the Health and Safety at Work etc. Act 1974 and all other related and relevant legislation as appropriate
- Providing effective information, instruction, training and supervision for employees so they are competent and have the necessary skills to safely carry out their work
- Maintaining an occupational health and safety management system where health and safety matters are monitored and reviewed by line management in consultation with staff and their representatives
- Constantly improving health and safety performance and setting measurable objectives in order to achieve this aim

ORGANISATION AND RESPONSIBILITIES

The Managing Director has overall responsibility for the co-ordination of Recorra's Health and Safety Policy. The SHEQ Director is responsible for all day-to-day aspects of health and safety.

Other directors and line managers are responsible for implementing Recorra's Health and Safety Policy and will ensure that suitable risk assessments are made for all activities performed by employees, including road driving and workplace transport, so that hazards are eliminated wherever possible, and that vehicles, plant and equipment under their control are safe and correctly maintained. Line managers are also responsible for keeping current safety measures under review and for the instruction and training of all their respective staff.

All employees have a duty to co-operate with this policy, to identify and report hazards, dangers or unsatisfactory conditions and to take reasonable care to avoid injury to themselves and others.

DETAILED ARRANGEMENTS

Workplace Transport and Road Driving: We recognize that our vehicles pose a risk to members of the public and other road users, as well as to our own drivers. We have risk assessed all vehicle related activities and in order to minimize the effect of these activities, have implemented codes of safe working practice for individual vehicle types and trained drivers accordingly.

Information, Instruction and Training: All staff will receive a comprehensive induction specific to their role upon joining the business. Refresher training will be completed on a pre-determined basis dependent on the risk of the activities. Induction and training programmes are under regular review and take into consideration new or updated processes, industry guidance and learnings, staff and

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Policies

Health & Safety

Recorra

learner feedback, accident trends and improvement opportunities relating to training aids or available technology.

Fire: Any person discovering a fire on company premises should raise the alarm. If it is possible to extinguish the fire without danger, this should be done immediately, otherwise the building must be evacuated after all employees and visitors have been warned.

All employees and visitors, being advised of a fire, must immediately vacate the premises by the nearest exit and gather at the designated assembly point.

Accident: All injuries and damage, however slight, must be reported to the employee's manager. An account must be entered in the Accident Book. If the accident is reportable under RIDDOR requirements, this will be done by the Health and Safety Manager.

Qualified first-aiders are available for an injury or illness requiring treatment at the company premises. Names are displayed on relevant notice boards.

Visitors: Company employees bringing contractors, visitors or others onto company premises are responsible for ensuring that an appropriate risk assessment has been made and that, so far as is reasonably practicable, suitable provision is made with regard to their health and safety on site. All working at height and hot-working on company premises (welding, grinding, bitumen roofing, etc) is subject to a special arrangement and permit system authorised by a director or delegated manager.

The Recorra Health and Safety Policy Manual is available to all employees and outlines in full the company's strategy for health and safety. The Policy will be reviewed and revised at regular intervals.

Signed: Date: 01/04/2026

MANAGING DIRECTOR

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Policies

Modern Slavery Statement



Recorra

Recorra Ltd – MODERN SLAVERY STATEMENT

Recorra has a zero-tolerance policy towards slavery and human trafficking and is committed to complying with the provisions in the Modern Slavery Act 2015.

Recorra is controlled by a Board of Directors. The information included in the statement refers to the financial year ending 31st March 2026.

A) ORGANISATION

Recorra was founded by Friends of the Earth in 1988 (as Paper Round), specifically to provide high quality environmental services to offices in London. We have kept this focus on meeting the highest environmental standards as we have grown to offer a complete spectrum of waste management services to businesses in London and the South East. This includes the collection, transportation, processing and recycling of waste materials and equipment and, additionally, the secure collection and destruction of confidential waste products. Recorra also supplies office stationery products, including a wide range of recycled products.

Recorra operates from the following locations:

- Recorra Head Office – London
- Materials Recycling Facility - Essex
- South Coast Recycling Services – Brighton and Hastings, East Sussex

The labour supplied to Recorra in pursuance of its operation is wholly carried out in the United Kingdom. Demand for Recorra's services is consistently high throughout the year and is therefore not seasonal.

B) DEFINITIONS

Recorra considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement

C) COMMITMENT

Recorra acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. We understand that this requires an ongoing review of both our internal practices in relation to our labour force and, additionally, our supply chains.

Recorra does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

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Policies

Modern Slavery Statement

Recorra

No labour provided to Recorra in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Recorra strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom and in many cases, we exceed those minimums in relation to our employees.

D) SUPPLY CHAINS

We have a zero tolerance policy to slavery and human trafficking and expect all those in our supply chain and contractors to comply with our values.

In order to fulfil our activities, Recorra's main supply chains include those related to the supply of equipment, goods and services from various suppliers in both the United Kingdom and Europe. We understand that for some goods and equipment, Recorra's first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

E) POTENTIAL EXPOSURE

In general, Recorra considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, we have taken steps to ensure that such practices do not take place within our business, nor within the business of any organisation that supplies goods and/or services to us. Where possible we build long standing relationships with suppliers and make clear our expectations of business behaviour.

F) STEPS

Recorra carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in our organisation or supply chains, including conducting a review of the controls of our suppliers.

Recorra has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, Recorra has taken the following steps to ensure that modern slavery is not taking place:

- We have transparent recruitment processes which are reviewed regularly, as well as robust procedures in place for the vetting of new employees. We ensure we are able to confirm their identity and that they are paid directly into an appropriate personal bank account.
- To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

G) KEY PERFORMANCE INDICATORS

Recorra has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place within Recorra itself, or in its supply chains:

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Policies

Modern Slavery Statement

- Use of labour monitoring and payroll systems
- Level of communication and personal contact with the next link in the supply chain and their understanding of, and compliance with, our expectations

In the future we intend to:

- Put further measures in place to identify and assess the potential risks in our supply chains
- Review supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery

H) POLICIES

Recorra has the following policies which further define its stance on modern slavery:

- Corporate Social Responsibility Policy
- Ethical Policy
- Sustainable Procurement Policy
- Equal Opportunities Policy
- Quality Policy

I) SLAVERY COMPLIANCE OFFICER

Recorra has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regards to Recorra's obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

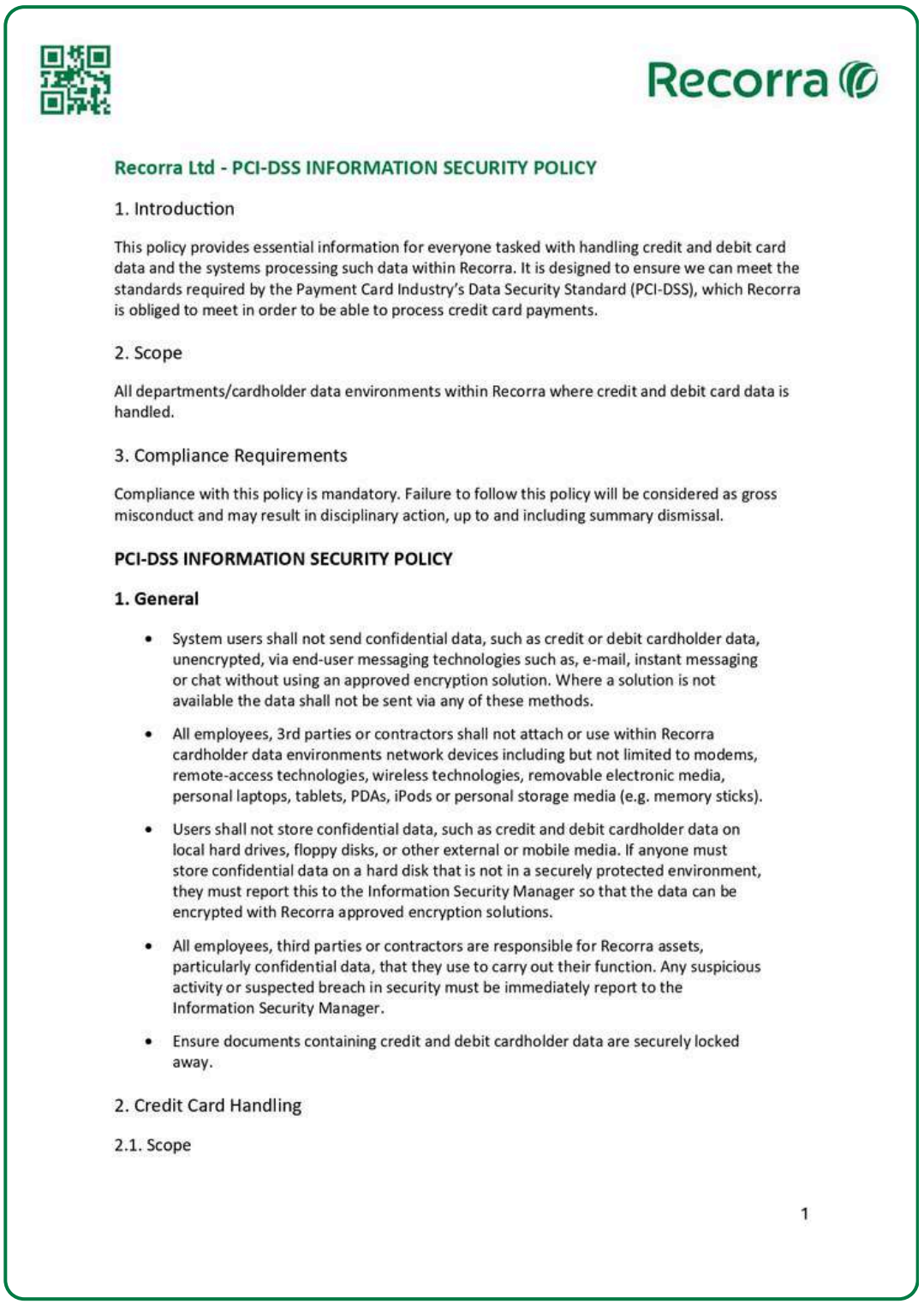
Signed: Date: 01/04/2026

MANAGING DIRECTOR

3

Policies

PCI-DSS



Recorra

Recorra Ltd - PCI-DSS INFORMATION SECURITY POLICY

1. Introduction

This policy provides essential information for everyone tasked with handling credit and debit card data and the systems processing such data within Recorra. It is designed to ensure we can meet the standards required by the Payment Card Industry's Data Security Standard (PCI-DSS), which Recorra is obliged to meet in order to be able to process credit card payments.

2. Scope

All departments/cardholder data environments within Recorra where credit and debit card data is handled.

3. Compliance Requirements

Compliance with this policy is mandatory. Failure to follow this policy will be considered as gross misconduct and may result in disciplinary action, up to and including summary dismissal.

PCI-DSS INFORMATION SECURITY POLICY

1. General

- System users shall not send confidential data, such as credit or debit cardholder data, unencrypted, via end-user messaging technologies such as, e-mail, instant messaging or chat without using an approved encryption solution. Where a solution is not available the data shall not be sent via any of these methods.
- All employees, 3rd parties or contractors shall not attach or use within Recorra cardholder data environments network devices including but not limited to modems, remote-access technologies, wireless technologies, removable electronic media, personal laptops, tablets, PDAs, iPods or personal storage media (e.g. memory sticks).
- Users shall not store confidential data, such as credit and debit cardholder data on local hard drives, floppy disks, or other external or mobile media. If anyone must store confidential data on a hard disk that is not in a securely protected environment, they must report this to the Information Security Manager so that the data can be encrypted with Recorra approved encryption solutions.
- All employees, third parties or contractors are responsible for Recorra assets, particularly confidential data, that they use to carry out their function. Any suspicious activity or suspected breach in security must be immediately report to the Information Security Manager.
- Ensure documents containing credit and debit cardholder data are securely locked away.

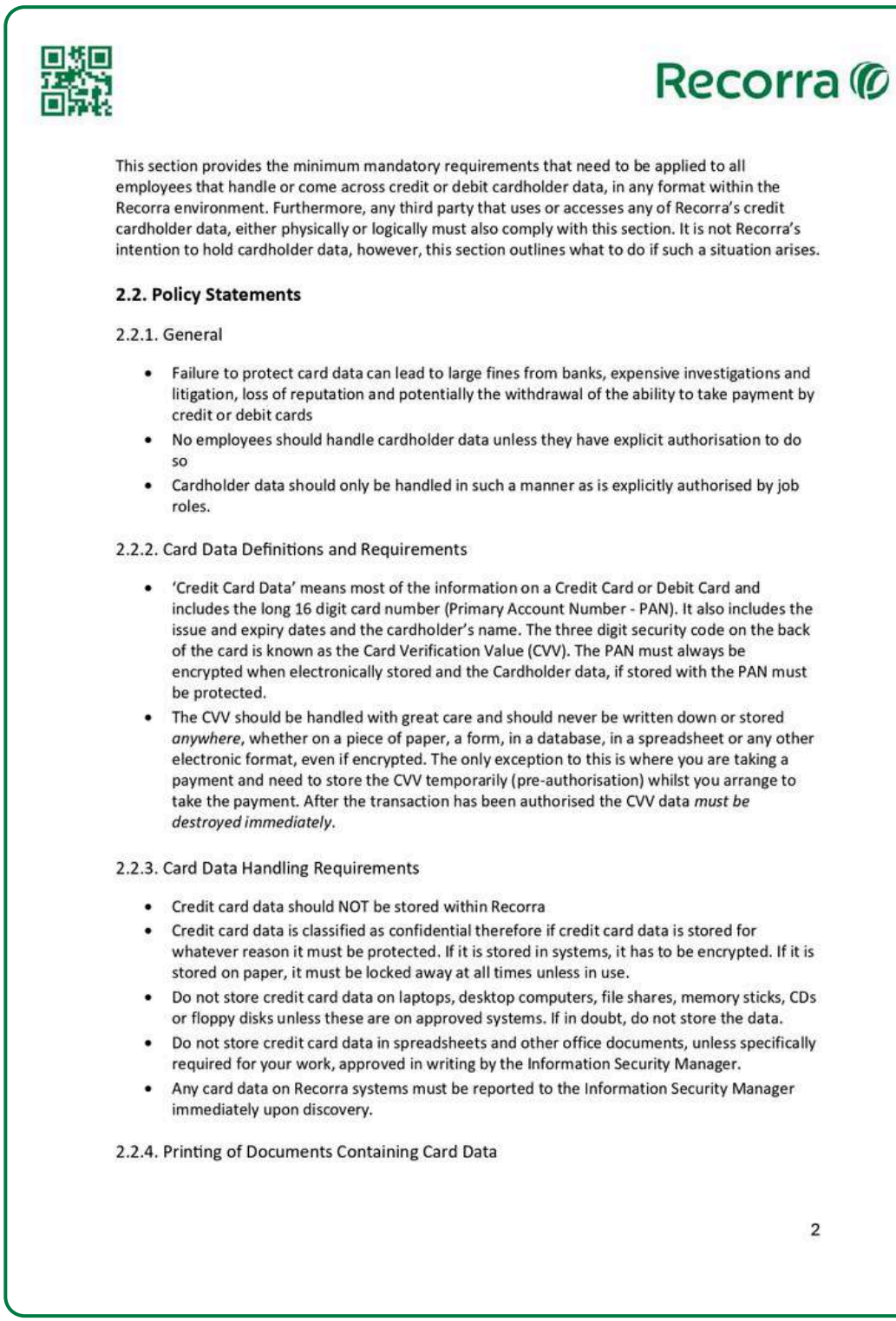
2. Credit Card Handling

2.1. Scope

1

Policies

PCI-DSS



Recorra

This section provides the minimum mandatory requirements that need to be applied to all employees that handle or come across credit or debit cardholder data, in any format within the Recorra environment. Furthermore, any third party that uses or accesses any of Recorra's credit cardholder data, either physically or logically must also comply with this section. It is not Recorra's intention to hold cardholder data, however, this section outlines what to do if such a situation arises.

2.2. Policy Statements

2.2.1. General

- Failure to protect card data can lead to large fines from banks, expensive investigations and litigation, loss of reputation and potentially the withdrawal of the ability to take payment by credit or debit cards
- No employees should handle cardholder data unless they have explicit authorisation to do so
- Cardholder data should only be handled in such a manner as is explicitly authorised by job roles.

2.2.2. Card Data Definitions and Requirements

- 'Credit Card Data' means most of the information on a Credit Card or Debit Card and includes the long 16 digit card number (Primary Account Number - PAN). It also includes the issue and expiry dates and the cardholder's name. The three digit security code on the back of the card is known as the Card Verification Value (CVV). The PAN must always be encrypted when electronically stored and the Cardholder data, if stored with the PAN must be protected.
- The CVV should be handled with great care and should never be written down or stored *anywhere*, whether on a piece of paper, a form, in a database, in a spreadsheet or any other electronic format, even if encrypted. The only exception to this is where you are taking a payment and need to store the CVV temporarily (pre-authorisation) whilst you arrange to take the payment. After the transaction has been authorised the CVV data *must be destroyed immediately*.

2.2.3. Card Data Handling Requirements

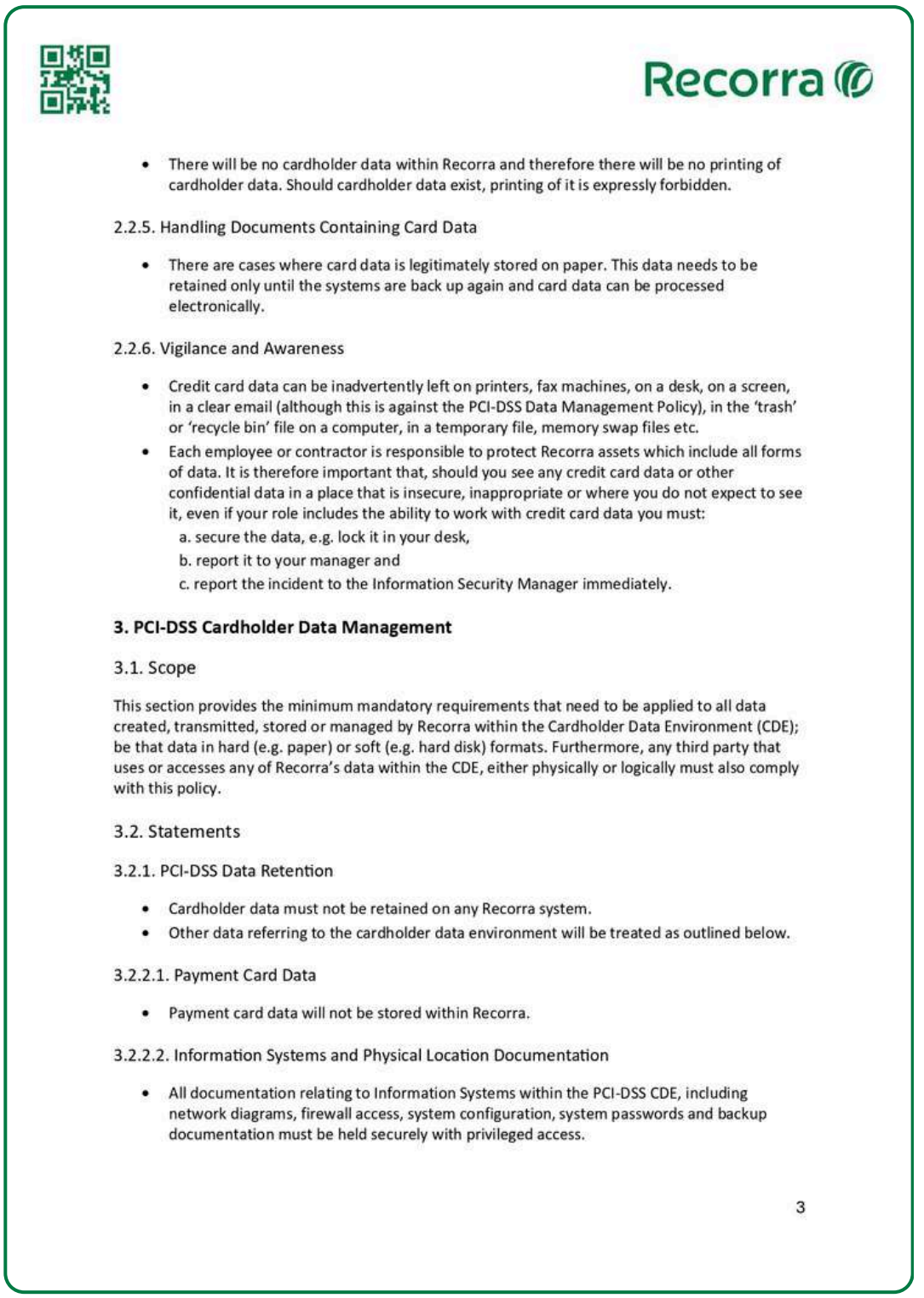
- Credit card data should NOT be stored within Recorra
- Credit card data is classified as confidential therefore if credit card data is stored for whatever reason it must be protected. If it is stored in systems, it has to be encrypted. If it is stored on paper, it must be locked away at all times unless in use.
- Do not store credit card data on laptops, desktop computers, file shares, memory sticks, CDs or floppy disks unless these are on approved systems. If in doubt, do not store the data.
- Do not store credit card data in spreadsheets and other office documents, unless specifically required for your work, approved in writing by the Information Security Manager.
- Any card data on Recorra systems must be reported to the Information Security Manager immediately upon discovery.

2.2.4. Printing of Documents Containing Card Data

2

Policies

PCI-DSS



- There will be no cardholder data within Recorra and therefore there will be no printing of cardholder data. Should cardholder data exist, printing of it is expressly forbidden.

2.2.5. Handling Documents Containing Card Data

- There are cases where card data is legitimately stored on paper. This data needs to be retained only until the systems are back up again and card data can be processed electronically.

2.2.6. Vigilance and Awareness

- Credit card data can be inadvertently left on printers, fax machines, on a desk, on a screen, in a clear email (although this is against the PCI-DSS Data Management Policy), in the 'trash' or 'recycle bin' file on a computer, in a temporary file, memory swap files etc.
- Each employee or contractor is responsible to protect Recorra assets which include all forms of data. It is therefore important that, should you see any credit card data or other confidential data in a place that is insecure, inappropriate or where you do not expect to see it, even if your role includes the ability to work with credit card data you must:
  a. secure the data, e.g. lock it in your desk,
  b. report it to your manager and
  c. report the incident to the Information Security Manager immediately.

3. PCI-DSS Cardholder Data Management

3.1. Scope

This section provides the minimum mandatory requirements that need to be applied to all data created, transmitted, stored or managed by Recorra within the Cardholder Data Environment (CDE); be that data in hard (e.g. paper) or soft (e.g. hard disk) formats. Furthermore, any third party that uses or accesses any of Recorra's data within the CDE, either physically or logically must also comply with this policy.

3.2. Statements

3.2.1. PCI-DSS Data Retention

- Cardholder data must not be retained on any Recorra system.
- Other data referring to the cardholder data environment will be treated as outlined below.

3.2.2.1. Payment Card Data

- Payment card data will not be stored within Recorra.

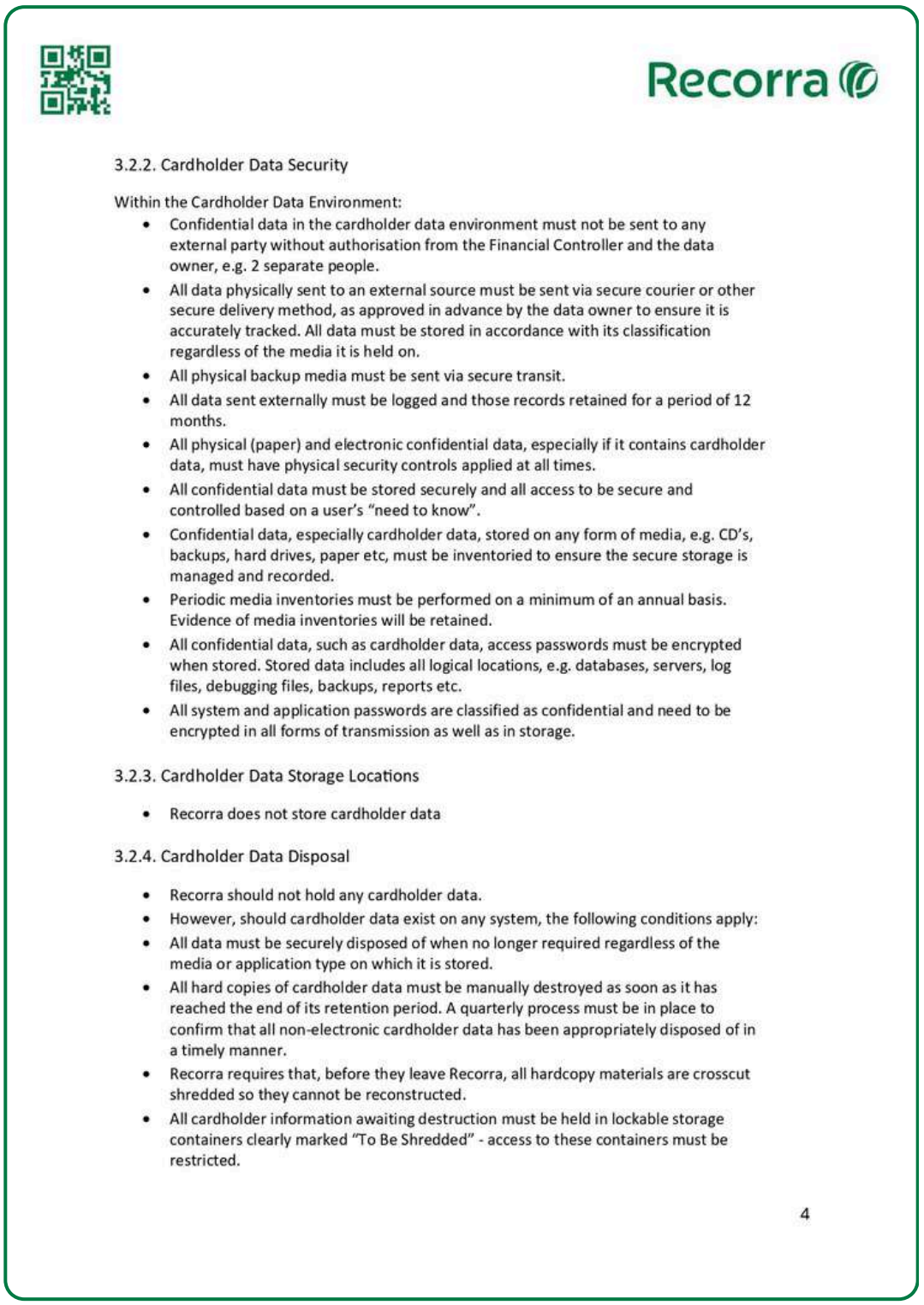
3.2.2.2. Information Systems and Physical Location Documentation

- All documentation relating to Information Systems within the PCI-DSS CDE, including network diagrams, firewall access, system configuration, system passwords and backup documentation must be held securely with privileged access.

3

Policies

PCI-DSS



Recorra

3.2.2. Cardholder Data Security

Within the Cardholder Data Environment:

- Confidential data in the cardholder data environment must not be sent to any external party without authorisation from the Financial Controller and the data owner, e.g. 2 separate people.
- All data physically sent to an external source must be sent via secure courier or other secure delivery method, as approved in advance by the data owner to ensure it is accurately tracked. All data must be stored in accordance with its classification regardless of the media it is held on.
- All physical backup media must be sent via secure transit.
- All data sent externally must be logged and those records retained for a period of 12 months.
- All physical (paper) and electronic confidential data, especially if it contains cardholder data, must have physical security controls applied at all times.
- All confidential data must be stored securely and all access to be secure and controlled based on a user's "need to know".
- Confidential data, especially cardholder data, stored on any form of media, e.g. CD's, backups, hard drives, paper etc, must be inventoried to ensure the secure storage is managed and recorded.
- Periodic media inventories must be performed on a minimum of an annual basis. Evidence of media inventories will be retained.
- All confidential data, such as cardholder data, access passwords must be encrypted when stored. Stored data includes all logical locations, e.g. databases, servers, log files, debugging files, backups, reports etc.
- All system and application passwords are classified as confidential and need to be encrypted in all forms of transmission as well as in storage.

3.2.3. Cardholder Data Storage Locations

- Recorra does not store cardholder data

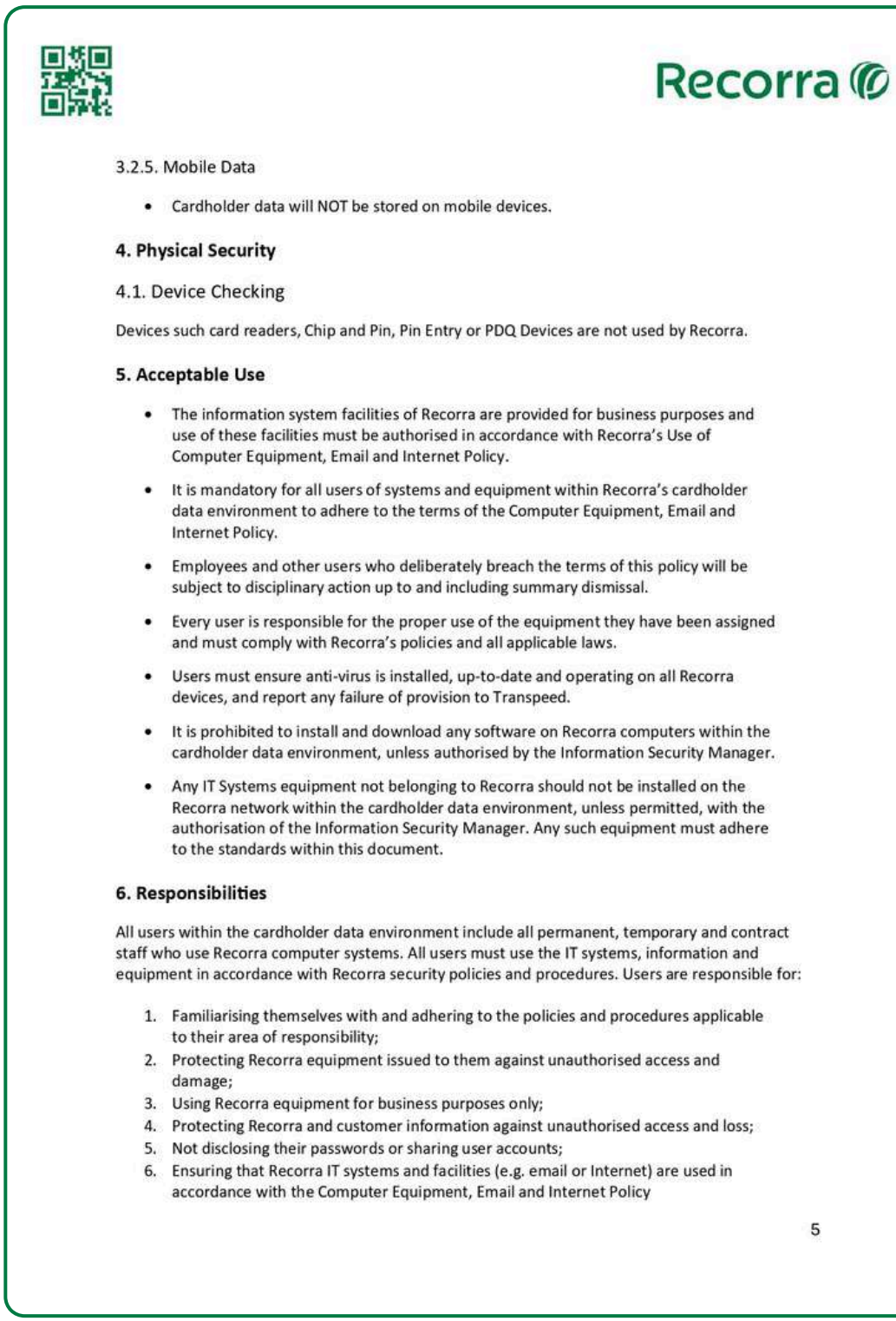
3.2.4. Cardholder Data Disposal

- Recorra should not hold any cardholder data.
- However, should cardholder data exist on any system, the following conditions apply:
- All data must be securely disposed of when no longer required regardless of the media or application type on which it is stored.
- All hard copies of cardholder data must be manually destroyed as soon as it has reached the end of its retention period. A quarterly process must be in place to confirm that all non-electronic cardholder data has been appropriately disposed of in a timely manner.
- Recorra requires that, before they leave Recorra, all hardcopy materials are crosscut shredded so they cannot be reconstructed.
- All cardholder information awaiting destruction must be held in lockable storage containers clearly marked "To Be Shredded" - access to these containers must be restricted.

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Policies

PCI-DSS



Recorra

3.2.5. Mobile Data

- Cardholder data will NOT be stored on mobile devices.

4. Physical Security

4.1. Device Checking

Devices such card readers, Chip and Pin, Pin Entry or PDQ Devices are not used by Recorra.

5. Acceptable Use

- The information system facilities of Recorra are provided for business purposes and use of these facilities must be authorised in accordance with Recorra's Use of Computer Equipment, Email and Internet Policy.
- It is mandatory for all users of systems and equipment within Recorra's cardholder data environment to adhere to the terms of the Computer Equipment, Email and Internet Policy.
- Employees and other users who deliberately breach the terms of this policy will be subject to disciplinary action up to and including summary dismissal.
- Every user is responsible for the proper use of the equipment they have been assigned and must comply with Recorra's policies and all applicable laws.
- Users must ensure anti-virus is installed, up-to-date and operating on all Recorra devices, and report any failure of provision to Transpeed.
- It is prohibited to install and download any software on Recorra computers within the cardholder data environment, unless authorised by the Information Security Manager.
- Any IT Systems equipment not belonging to Recorra should not be installed on the Recorra network within the cardholder data environment, unless permitted, with the authorisation of the Information Security Manager. Any such equipment must adhere to the standards within this document.

6. Responsibilities

All users within the cardholder data environment include all permanent, temporary and contract staff who use Recorra computer systems. All users must use the IT systems, information and equipment in accordance with Recorra security policies and procedures. Users are responsible for:

1. Familiarising themselves with and adhering to the policies and procedures applicable to their area of responsibility;
2. Protecting Recorra equipment issued to them against unauthorised access and damage;
3. Using Recorra equipment for business purposes only;
4. Protecting Recorra and customer information against unauthorised access and loss;
5. Not disclosing their passwords or sharing user accounts;
6. Ensuring that Recorra IT systems and facilities (e.g. email or Internet) are used in accordance with the Computer Equipment, Email and Internet Policy

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Policies

PCI-DSS



Recorra

7. Clearing desks of all sensitive material and logging off or locking workstations at the end of the day and when leaving their desk;
8. Not removing equipment, information or any other Recorra property from the organisation's premises without authorisation;
9. Not connecting personal equipment to Recorra networks within the cardholder data environment;
10. Not installing, copying or modifying any software on Recorra equipment without authorisation;
11. Immediately reporting security incidents to their Line Manager or the Information Security Officer.

Responsibilities for carrying out specific information security duties will be defined in job descriptions where applicable.

This policy will be reviewed on an annual basis.

Signed: Date: 01/04/2026

MANAGING DIRECTOR

6

Policies

Quality



Recorra

Recorra Ltd - QUALITY POLICY

It is Recorra's aim to provide a consistent, high quality service which meets the requirements and expectations of our clients at all times.

The commitment to quality is based on the implementation of a quality management system which is defined in a documented management manual. It provides clear standards and guidelines for all areas of the company's activities.

The Directors, Management Team and all employees of Recorra are fully committed to a process of continuous improvement in all our products and services. To achieve this, Recorra has set the following quality objectives:

- Ensure all employees are fully trained and proficient in their activities
- Monitor and measure customer response (to our products and services) in order to increase customer satisfaction
- Comply with relevant regulatory and industry standards, legislation and internationally recognised standards of approval
- Select Suppliers and sub-contractors based on corresponding levels of performance
- Control costs in all areas

Recorra will measure performance against these objectives in order to maintain and continually improve the effectiveness of the quality management system.

This policy will be reviewed on an annual basis.

Signed: Date: 01/04/2026

MANAGING DIRECTOR

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Policies

Right to Work

Recorra

Recorra Ltd – RIGHT TO WORK POLICY

Recorra serviced customers

Recorra confirms that appropriate Right to Work checks have been completed for all employees assigned to provide services under this contract. Responsibility for Right to Work compliance sits with our People Team, supported by hiring managers and operational management.

At present, services are being delivered directly by Recorra employees. Should we propose to use any subcontractor in connection with the services, we will notify you in advance and ensure appropriate Right to Work compliance requirements are in place.

Recorra maintains records of all required Right to Work checks and operates appropriate follow-up procedures where an individual's right to work is time-limited. We are committed to ensuring ongoing compliance with UK Right to Work legislation and maintain processes to verify and monitor eligibility to work throughout employment.

Customers that may have subcontractors servicing them

Recorra confirms that all employees directly engaged in the delivery of services have undergone the appropriate Right to Work checks in accordance with UK legislation. Responsibility for Right to Work compliance is managed by our People Team and supported by our operational management teams.

Where services are delivered by approved subcontractors, Recorra operates a supplier due diligence process to obtain assurances that appropriate Right to Work checks have been completed and that the subcontractor maintains the required records and follow-up procedures. As part of our compliance programme, subcontractors are required to confirm that they meet their Right to Work obligations and maintain appropriate processes to ensure ongoing compliance.

Recorra maintains records of its own Right to Work checks and supplier compliance assurances and takes reasonable steps to monitor compliance throughout its supply chain in line with current UK Right to Work requirements.

This policy will be reviewed on an annual basis.

Signed: Date: 01/10/2026

MANAGING DIRECTOR

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Policies

Supplier Code of Conduct

Recorra

Recorra Ltd – SUPPLIER CODE OF CONDUCT

The purpose of this document is to set out the level of conduct that we expect from our approved supply chain. The code of conduct is in line with our own beliefs and the standards we set ourselves.

Before working with any new supplier, we will carry out due diligence checks in the following areas: Health and safety, quality assurance, environmental management, social value and employment practices, IT security and data protection, risk management and business compliance.

New suppliers will be issued with our Supplier Code of Conduct and must agree and adhere to the terms.

We also expect that all approved suppliers/subcontractors will comply with the Bribery and Corruption Act 2010, as do all staff and representatives working for, or on behalf of, Recorra.

All suppliers/subcontractors must comply with the following:

- Comply with all relevant legislation and keep up to date with changes and updates
- Actively promote, maintain and practice robust health and safety standards
- Supply products fit for purpose that meet specification in the agreed lead time to a consistent standard and ensure an uninterrupted supply
- Supply services requested to the highest standard in the agreed timeframe in a professional manner
- Resolve complaints in a timely and effective manner ensuring the root cause is identified to prevent reoccurrence
- Ensure compliance with employment law including working time legislation and the payment of fair wage rates
- Maintain good working and payment practices throughout the supply chain
- Encourage open and transparent communication
- Practice equal opportunities and diversity
- Comply with GDPR
- Support and be sympathetic to the local community
- Understand each other's goals in order that all parties be supported to achieve them
- Be aware of market conditions and potential risk factors

Signed: Date: 01/04/2026

MANAGING DIRECTOR

1

Policies

Supply Chain Diversity

Recorra

Recorra Ltd – SUPPLY CHAIN DIVERSITY POLICY

In line with our commitment to promote equal opportunities for all of our employees and customers, Recorra strives to ensure that the same fair and equal opportunities are extended to our supply chain.

We consider that diverse suppliers may consist of, but are not limited to, the following:

- Small and Medium Enterprises (SME's)
- Businesses that are majority owned, operated, managed and controlled by women, ethnic minorities, people with disabilities or LGBTQ people
- Suppliers from other under-represented or protected groups

It is our aim to operate a fair and inclusive procurement process so that all businesses, regardless of their size, location, and the background of their workforce, have the same opportunities to compete for the supply of goods and services to Recorra.

We believe that by actively encouraging diversity in our supply chain, we will:

- Strengthen and bring our procurement and equality and diversity strategies into alignment
- Assist with promoting our commitment to sustainability and the standards that we would like our supply chain to achieve and promote within their own supply chain
- Improve engagement with our suppliers
- Support the local community by working with local businesses
- Identify new markets and suppliers

We will ensure that this policy is communicated to all staff and is reviewed annually to ensure that we comply with our aim to continually improve.

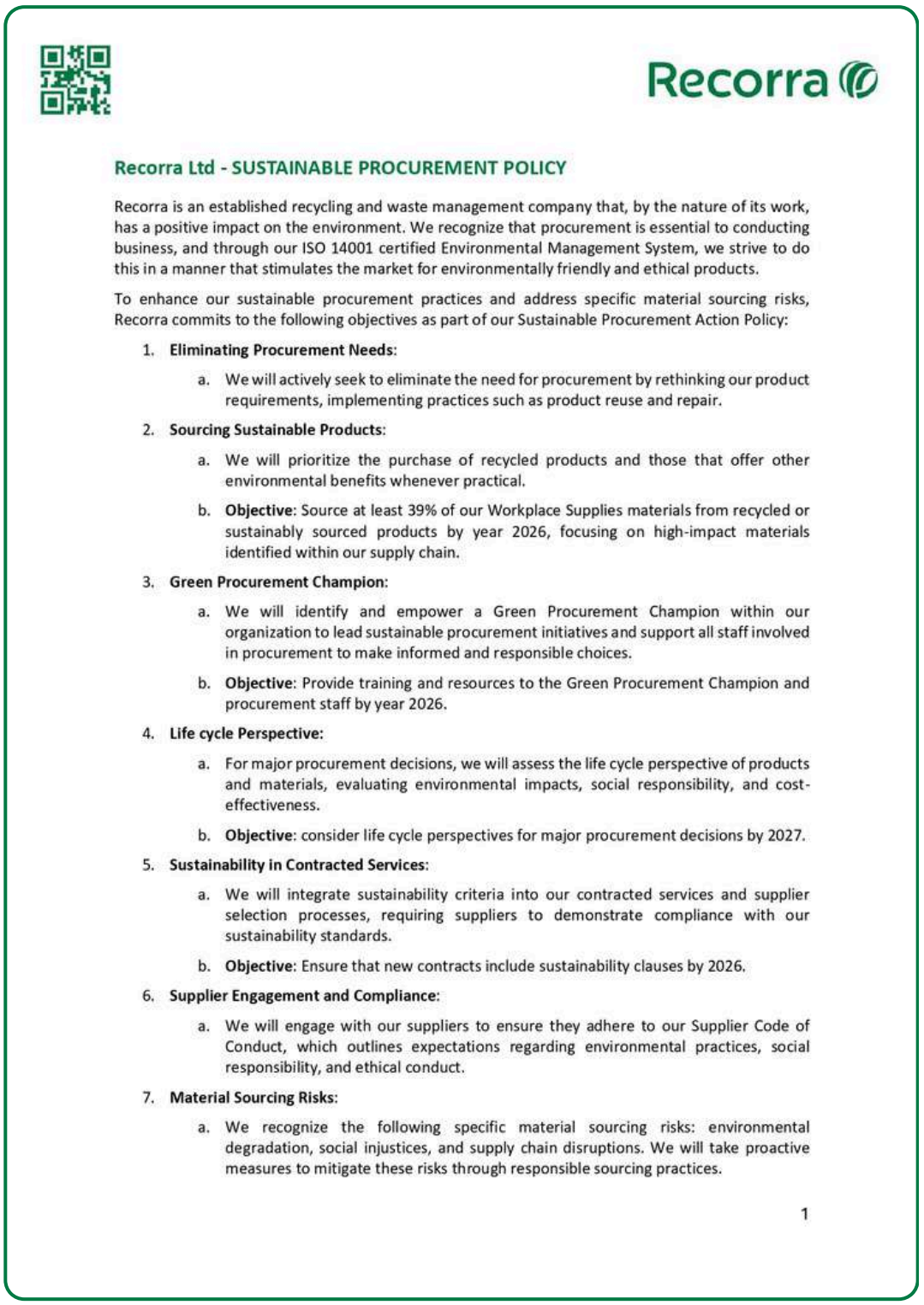
Signed: Date: 01/04/2026

MANAGING DIRECTOR

1

Policies

Sustainable Procurement



Recorra

Recorra Ltd - SUSTAINABLE PROCUREMENT POLICY

Recorra is an established recycling and waste management company that, by the nature of its work, has a positive impact on the environment. We recognize that procurement is essential to conducting business, and through our ISO 14001 certified Environmental Management System, we strive to do this in a manner that stimulates the market for environmentally friendly and ethical products.

To enhance our sustainable procurement practices and address specific material sourcing risks, Recorra commits to the following objectives as part of our Sustainable Procurement Action Policy:

1. **Eliminating Procurement Needs**:
    a. We will actively seek to eliminate the need for procurement by rethinking our product requirements, implementing practices such as product reuse and repair.
2. **Sourcing Sustainable Products**:
    a. We will prioritize the purchase of recycled products and those that offer other environmental benefits whenever practical.
    b. **Objective**: Source at least 39% of our Workplace Supplies materials from recycled or sustainably sourced products by year 2026, focusing on high-impact materials identified within our supply chain.
3. **Green Procurement Champion**:
    a. We will identify and empower a Green Procurement Champion within our organization to lead sustainable procurement initiatives and support all staff involved in procurement to make informed and responsible choices.
    b. **Objective**: Provide training and resources to the Green Procurement Champion and procurement staff by year 2026.
4. **Life cycle Perspective**:
    a. For major procurement decisions, we will assess the life cycle perspective of products and materials, evaluating environmental impacts, social responsibility, and cost-effectiveness.
    b. **Objective**: consider life cycle perspectives for major procurement decisions by 2027.
5. **Sustainability in Contracted Services**:
    a. We will integrate sustainability criteria into our contracted services and supplier selection processes, requiring suppliers to demonstrate compliance with our sustainability standards.
    b. **Objective**: Ensure that new contracts include sustainability clauses by 2026.
6. **Supplier Engagement and Compliance**:
    a. We will engage with our suppliers to ensure they adhere to our Supplier Code of Conduct, which outlines expectations regarding environmental practices, social responsibility, and ethical conduct.
7. **Material Sourcing Risks**:
    a. We recognize the following specific material sourcing risks: environmental degradation, social injustices, and supply chain disruptions. We will take proactive measures to mitigate these risks through responsible sourcing practices.

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Policies

Sustainable Procurement



8. **Periodic Review and Continuous Improvement:**
    a. We will review this policy periodically to ensure compliance with our sustainability objectives and to identify areas for improvement. Feedback from stakeholders will be incorporated into the review process.
    b. **Objective**: Ensure that the policy is updated periodically based on performance data and stakeholder feedback.
9. **Communication and Training:**
    a. This policy will be formally communicated to all staff and external stakeholders. Training sessions will be held to ensure understanding and implementation of sustainable procurement practices across the organization.
    b. **Objective**: Conduct at least one training session for procurement staff by 2026.

By adhering to this policy, Recorra aims to continually improve its sustainable procurement practices, positively impacting the environment and supporting the communities in which we operate.

Signed: Date: 01/04/2026

MANAGING DIRECTOR

2

Policies

Use of Computer, Email and Internet



Recorra

Recorra Ltd – USE OF COMPUTER EQUIPMENT, EMAIL AND INTERNET POLICY

A. USE OF COMPUTER EQUIPMENT

1. Personal use of our computers

Our computers, including laptops, and PDAs, are to be used solely for business purposes, subject to the following exceptions:

You may make reasonable personal use of the Company's computer system and internet connection. You should do this mainly outside of your normal working hours or during your lunch break, in accordance with the terms of this policy. In order to control the use of the Company's computer equipment and reduce the risk of viruses the following will apply:

a. The introduction of new software must first of all be checked and authorised by a nominated senior member of the Company.

b. Only authorised staff should have access to the Company's computer equipment.

c. Only authorised software may be used on any of the Company's computer equipment.

d. Only software that is used for business applications may be used.

e. No software may be brought onto or taken from the Company's premises without prior authorisation.

f. Unauthorised access to the computer network will result in disciplinary action.

g. Unauthorised copying and/or removal of computer equipment/software will result in disciplinary action. Such actions could lead to dismissal.

h. Proper care must be taken with Company laptops, data sticks etc when these are taken out of the office for any reason.

B. EMAIL AND INTERNET POLICY

1. Introduction

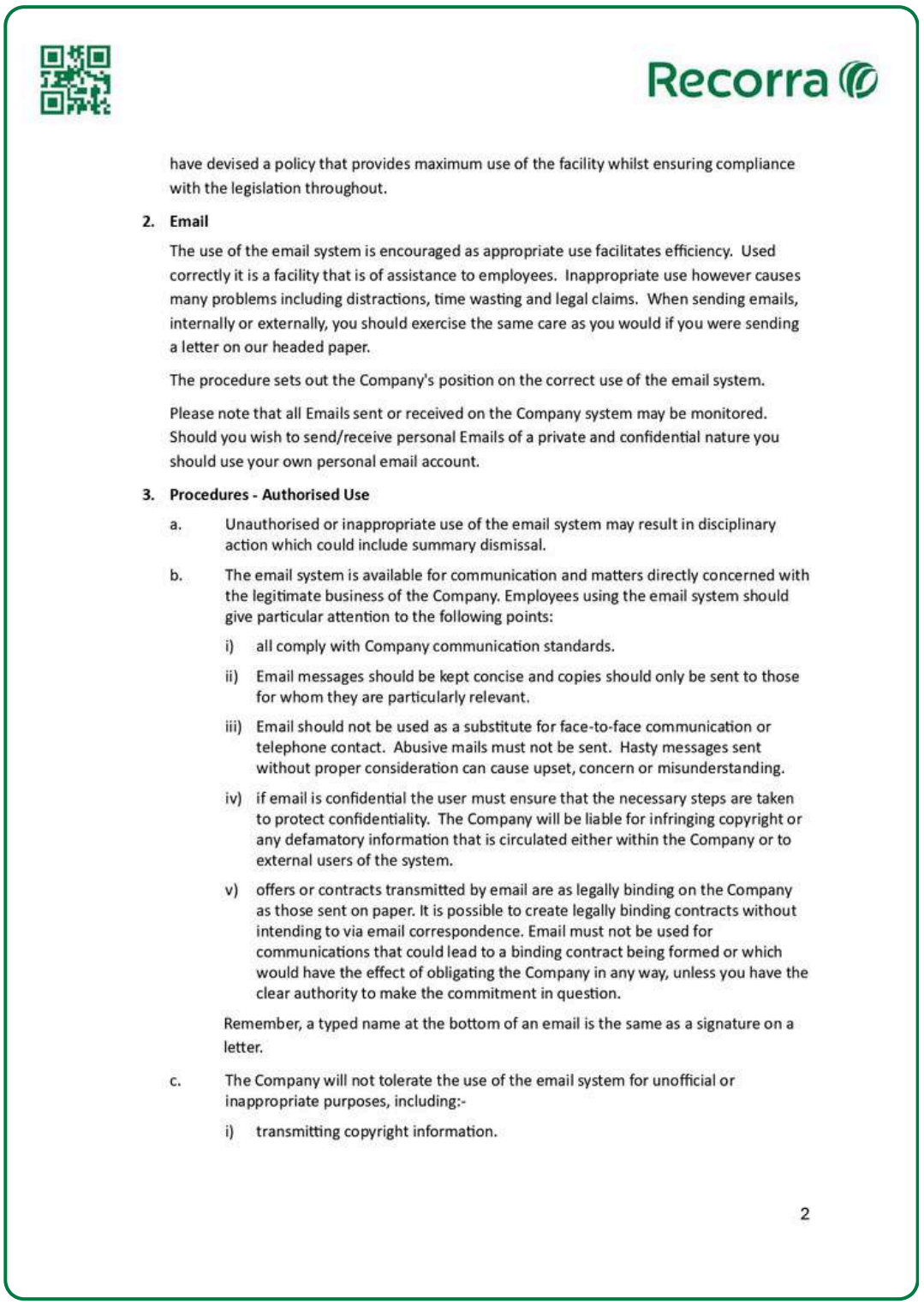
The purpose of the Internet and email policy is to provide a framework to ensure that there is continuity of procedures in the usage of internet and email within the Company. The internet and email system have established themselves as an important communications facility within the Company and have provided us with contact with professional and academic sources throughout the world. However, they also carry serious risks. Careless use of our email and internet system can have serious consequences. For example, it is possible to create a legally binding contract by exchange of email, or confidential information may be deliberately or accidentally sent to the wrong people.

In addition, misuse of the Internet and emails can introduce viruses into the network, infringe copyright laws and result in the harassment or defamation of others. For these reasons, we have to impose limits on Internet and email use in relation to both business and personal use. Therefore, to ensure that we are able to utilise the system to its optimum we

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Policies

Use of Computer, Email and Internet



Recorra

have devised a policy that provides maximum use of the facility whilst ensuring compliance with the legislation throughout.

2. **Email**

The use of the email system is encouraged as appropriate use facilitates efficiency. Used correctly it is a facility that is of assistance to employees. Inappropriate use however causes many problems including distractions, time wasting and legal claims. When sending emails, internally or externally, you should exercise the same care as you would if you were sending a letter on our headed paper.

The procedure sets out the Company's position on the correct use of the email system.

Please note that all Emails sent or received on the Company system may be monitored. Should you wish to send/receive personal Emails of a private and confidential nature you should use your own personal email account.

3. **Procedures - Authorised Use**

a. Unauthorised or inappropriate use of the email system may result in disciplinary action which could include summary dismissal.

b. The email system is available for communication and matters directly concerned with the legitimate business of the Company. Employees using the email system should give particular attention to the following points:

i) all comply with Company communication standards.

ii) Email messages should be kept concise and copies should only be sent to those for whom they are particularly relevant.

iii) Email should not be used as a substitute for face-to-face communication or telephone contact. Abusive mails must not be sent. Hasty messages sent without proper consideration can cause upset, concern or misunderstanding.

iv) if email is confidential the user must ensure that the necessary steps are taken to protect confidentiality. The Company will be liable for infringing copyright or any defamatory information that is circulated either within the Company or to external users of the system.

v) offers or contracts transmitted by email are as legally binding on the Company as those sent on paper. It is possible to create legally binding contracts without intending to via email correspondence. Email must not be used for communications that could lead to a binding contract being formed or which would have the effect of obligating the Company in any way, unless you have the clear authority to make the commitment in question.

Remember, a typed name at the bottom of an email is the same as a signature on a letter.

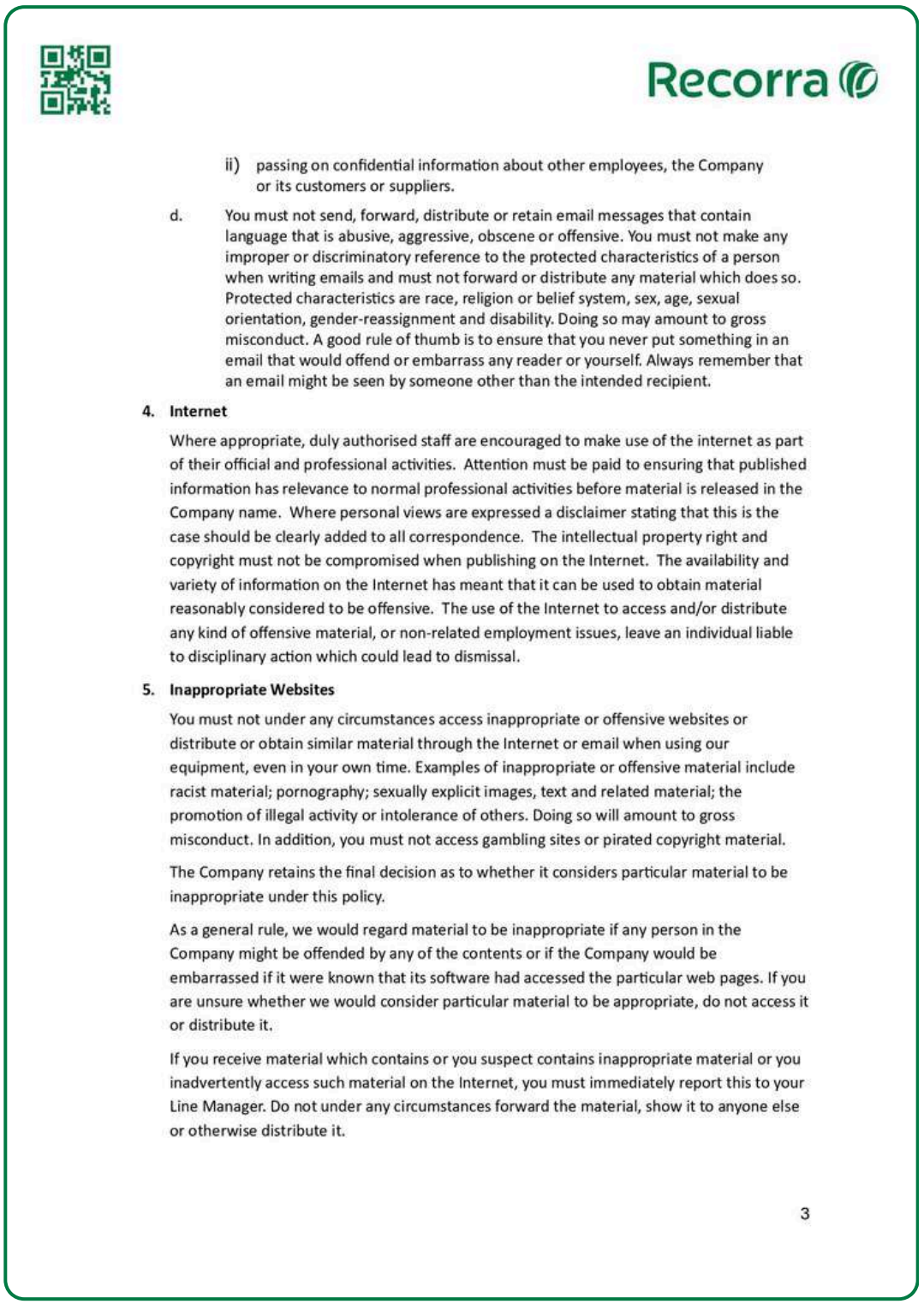
c. The Company will not tolerate the use of the email system for unofficial or inappropriate purposes, including:-

i) transmitting copyright information.

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Policies

Use of Computer, Email and Internet



Recorra

ii) passing on confidential information about other employees, the Company or its customers or suppliers.

d. You must not send, forward, distribute or retain email messages that contain language that is abusive, aggressive, obscene or offensive. You must not make any improper or discriminatory reference to the protected characteristics of a person when writing emails and must not forward or distribute any material which does so. Protected characteristics are race, religion or belief system, sex, age, sexual orientation, gender-reassignment and disability. Doing so may amount to gross misconduct. A good rule of thumb is to ensure that you never put something in an email that would offend or embarrass any reader or yourself. Always remember that an email might be seen by someone other than the intended recipient.

4. Internet

Where appropriate, duly authorised staff are encouraged to make use of the internet as part of their official and professional activities. Attention must be paid to ensuring that published information has relevance to normal professional activities before material is released in the Company name. Where personal views are expressed a disclaimer stating that this is the case should be clearly added to all correspondence. The intellectual property right and copyright must not be compromised when publishing on the Internet. The availability and variety of information on the Internet has meant that it can be used to obtain material reasonably considered to be offensive. The use of the Internet to access and/or distribute any kind of offensive material, or non-related employment issues, leave an individual liable to disciplinary action which could lead to dismissal.

5. Inappropriate Websites

You must not under any circumstances access inappropriate or offensive websites or distribute or obtain similar material through the Internet or email when using our equipment, even in your own time. Examples of inappropriate or offensive material include racist material; pornography; sexually explicit images, text and related material; the promotion of illegal activity or intolerance of others. Doing so will amount to gross misconduct. In addition, you must not access gambling sites or pirated copyright material.

The Company retains the final decision as to whether it considers particular material to be inappropriate under this policy.

As a general rule, we would regard material to be inappropriate if any person in the Company might be offended by any of the contents or if the Company would be embarrassed if it were known that its software had accessed the particular web pages. If you are unsure whether we would consider particular material to be appropriate, do not access it or distribute it.

If you receive material which contains or you suspect contains inappropriate material or you inadvertently access such material on the Internet, you must immediately report this to your Line Manager. Do not under any circumstances forward the material, show it to anyone else or otherwise distribute it.

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Policies

Use of Computer, Email and Internet



Recorra

6. **Virus Protection Procedure**

The introduction of a virus into our computer system could be devastating. We have installed antivirus software but this does not guard against all viruses. You should be aware that viruses can be introduced via email attachments, USB memory sticks and the Internet.

In order to prevent the introduction of virus contamination into the software system the following must be observed: -

a. It is your responsibility to take care when opening email attachments, especially when they are not expected or they are from unknown sources. If you are in any doubt about an attachment, please contact Transpeed who will check whether it is safe to open the attachment. You must never open attachments ending with '.exe' without first obtaining clearance from Transpeed.

b. You should not install any software that has not been approved or purchased by the Company, nor should you download any material, including games and screen savers, from the Internet or USB memory sticks without first obtaining the approval of Transpeed.

C. SECURITY

You are responsible for the security of the equipment allocated to you and must not allow it to be used by anyone other than in accordance with this policy.

1. **Wireless technology**

Everyone who has a Company laptop will be advised by Transpeed whether it can be used via wireless technology. This is only allowed if the appropriate security software and encryption are in place.

2. **Travelling**

Given the amount of confidential information which is accessible on our equipment, you must take sensible precautions when you take laptops and PDAs out of the office. In particular, you must never leave one of our laptops or PDAs on view inside a vehicle. If you have to leave such an item unattended in a vehicle, it must be locked away in the boot or glove compartment. If you are travelling on public transport or are in a public place, keep your laptop or PDA with you at all times or, if this is not possible, in sight. Remember that thieves specifically target laptop-carrying cases.

If you are working in a public place, be aware that other people may be able to read documents that you are working on.

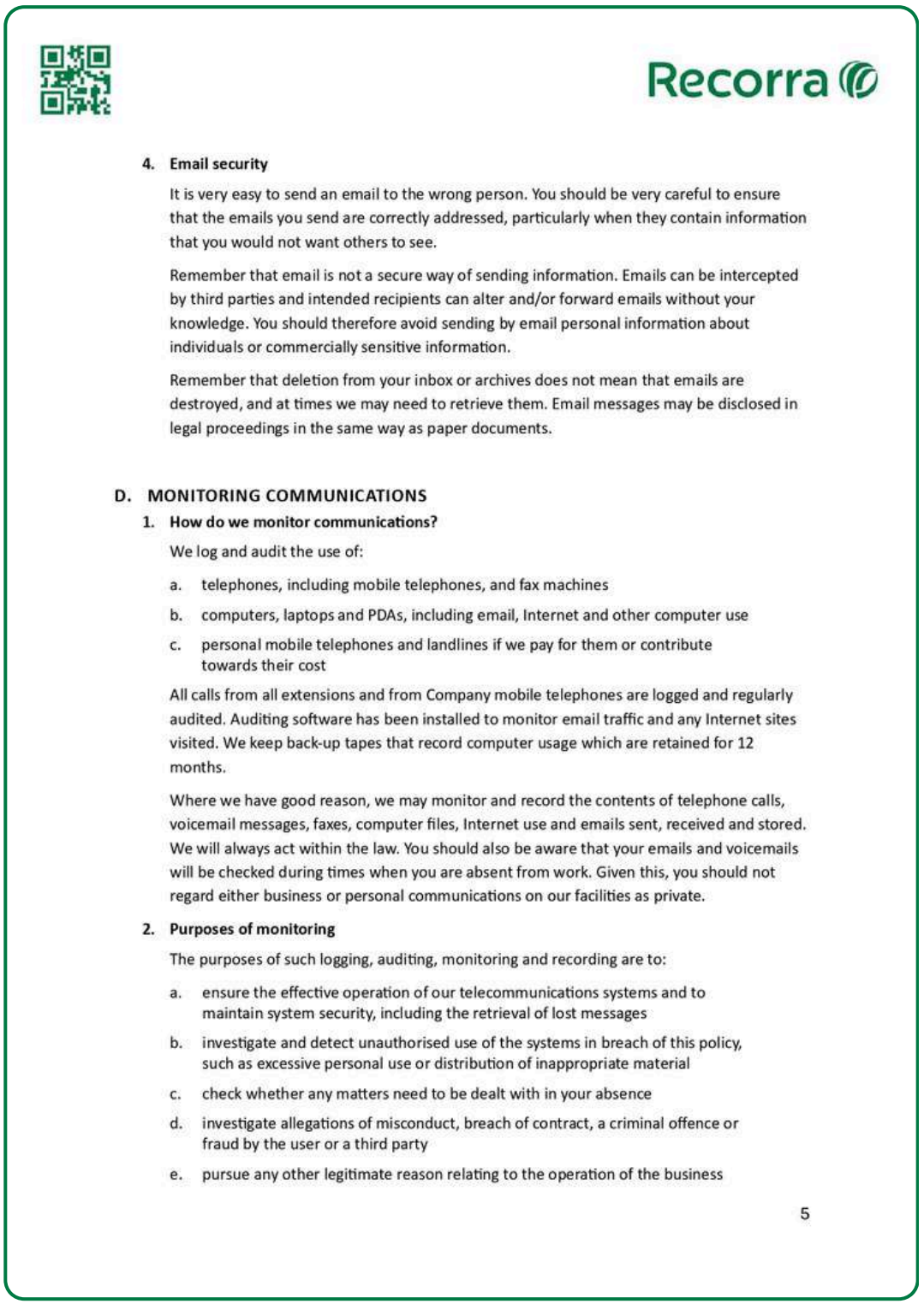
3. **Passwords**

You should not use another person's password without authorisation and you should not tell anyone (other than Transpeed or your Line Manager) your password, unless there is a pressing business need to do so. You must log out of your computer when you are not using it and when you leave the office. For the avoidance of doubt, on termination of your employment for whatever reason, you must provide details of all your passwords.

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Policies

Use of Computer, Email and Internet



Recorra

4. **Email security**

It is very easy to send an email to the wrong person. You should be very careful to ensure that the emails you send are correctly addressed, particularly when they contain information that you would not want others to see.

Remember that email is not a secure way of sending information. Emails can be intercepted by third parties and intended recipients can alter and/or forward emails without your knowledge. You should therefore avoid sending by email personal information about individuals or commercially sensitive information.

Remember that deletion from your inbox or archives does not mean that emails are destroyed, and at times we may need to retrieve them. Email messages may be disclosed in legal proceedings in the same way as paper documents.

D. MONITORING COMMUNICATIONS

1. **How do we monitor communications?**

We log and audit the use of:

a. telephones, including mobile telephones, and fax machines

b. computers, laptops and PDAs, including email, Internet and other computer use

c. personal mobile telephones and landlines if we pay for them or contribute towards their cost

All calls from all extensions and from Company mobile telephones are logged and regularly audited. Auditing software has been installed to monitor email traffic and any Internet sites visited. We keep back-up tapes that record computer usage which are retained for 12 months.

Where we have good reason, we may monitor and record the contents of telephone calls, voicemail messages, faxes, computer files, Internet use and emails sent, received and stored. We will always act within the law. You should also be aware that your emails and voicemails will be checked during times when you are absent from work. Given this, you should not regard either business or personal communications on our facilities as private.

2. **Purposes of monitoring**

The purposes of such logging, auditing, monitoring and recording are to:

a. ensure the effective operation of our telecommunications systems and to maintain system security, including the retrieval of lost messages

b. investigate and detect unauthorised use of the systems in breach of this policy, such as excessive personal use or distribution of inappropriate material

c. check whether any matters need to be dealt with in your absence

d. investigate allegations of misconduct, breach of contract, a criminal offence or fraud by the user or a third party

e. pursue any other legitimate reason relating to the operation of the business

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Policies

Use of Computer, Email and Internet



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This list is not exhaustive.

The information gathered will only be given to those who need to see it in accordance with these purposes. If information gathered is relevant to any disciplinary action taken, it will be made available to those who are involved in the disciplinary procedure.

E. SOCIAL MEDIA POLICY

1. Purpose and Scope

This policy covers all forms of social media, including Facebook, LinkedIn, X (formally known as Twitter), Google+, Wikipedia, other social networking sites, and other internet postings, including blogs. It applies to the use of social media for both business and personal purposes, during working hours and in your own time to the extent that it may affect the business of the Company. The policy applies both when the social media is accessed using our Information Systems and also when access using equipment or software belonging to employees or others.

Whilst we recognise the benefits which may be gained from appropriate use of social media, it is also important to be aware that it poses significant risks to our business. These risks include disclosure of confidential information and intellectual property, damage to our reputation and the risk of legal claims. To minimise these risks this policy sets out the rules applying to the use of social media.

This policy covers all employees of the Company. Breach of this policy may result in disciplinary action up to and including dismissal. Any misuse of social media should be reported to the Marketing Manager and the HR Manager. Questions regarding the content or application of this policy should be directed to the Marketing Manager or the HR Manager. This policy is not contractual and we may amend it at any time if we consider it appropriate to do so.

2. Personal use of social media at work

You are not permitted to access any social media for your personal use during working time or using our Information Systems at any other time. We may monitor your use of its systems, including use of social media sites.

3. Business use of social media

You may, and are encouraged to, share content by the company's official business page.

If you are required or permitted to use social media sites in the course of performing your duties for or on behalf of us, you should ensure that such use has appropriate authorisation and that it complies with the standards set out in this policy.

4. Responsible use of social media

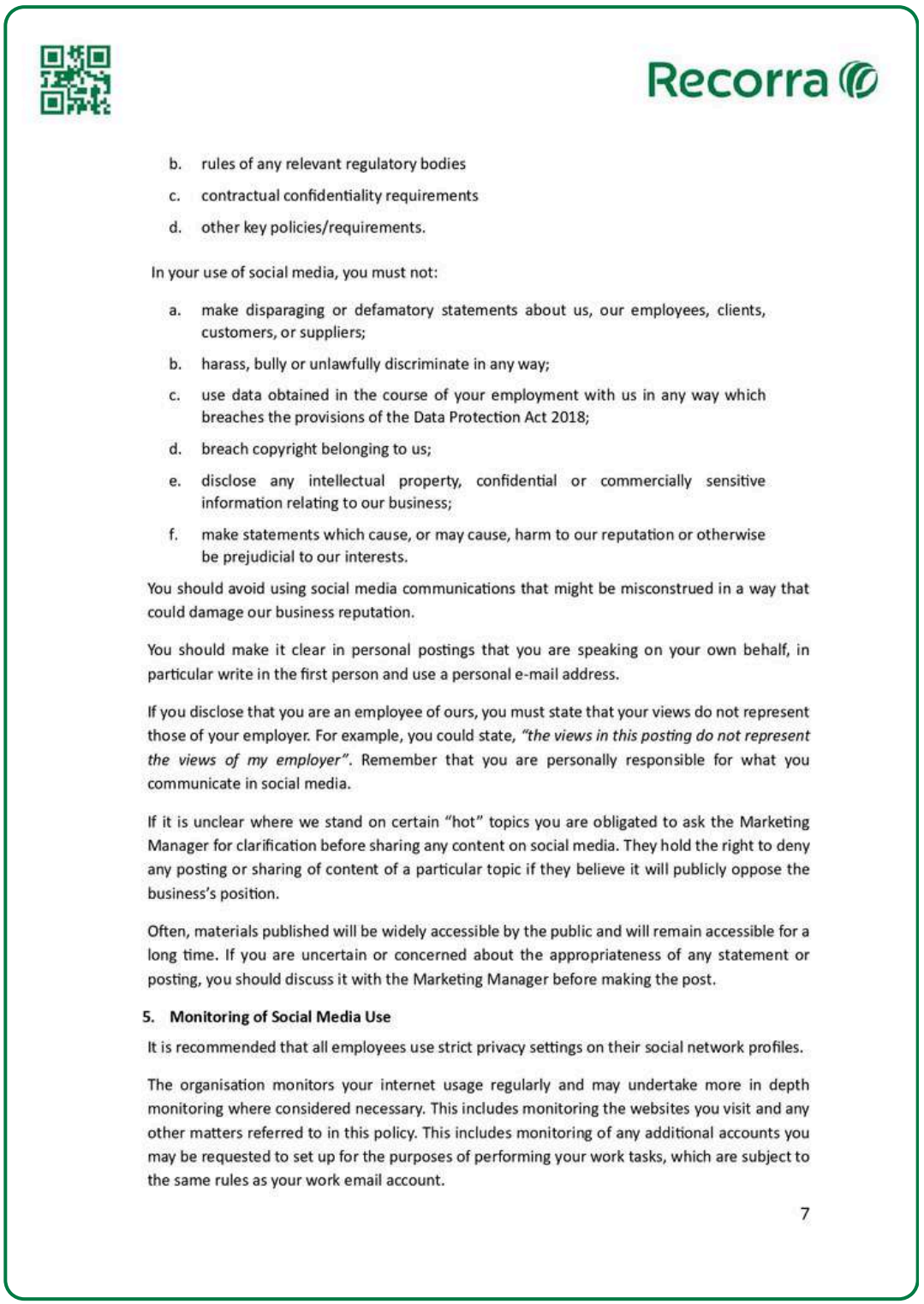
You must not use social media in a way that might breach any of our policies, any express or implied contractual obligations, legislation, or regulatory requirements. In particular, use of social media must comply with:

a. the Equal Opportunities and Personal Harassment policies

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Policies

Use of Computer, Email and Internet



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b. rules of any relevant regulatory bodies
c. contractual confidentiality requirements
d. other key policies/requirements.

In your use of social media, you must not:

a. make disparaging or defamatory statements about us, our employees, clients, customers, or suppliers;
b. harass, bully or unlawfully discriminate in any way;
c. use data obtained in the course of your employment with us in any way which breaches the provisions of the Data Protection Act 2018;
d. breach copyright belonging to us;
e. disclose any intellectual property, confidential or commercially sensitive information relating to our business;
f. make statements which cause, or may cause, harm to our reputation or otherwise be prejudicial to our interests.

You should avoid using social media communications that might be misconstrued in a way that could damage our business reputation.

You should make it clear in personal postings that you are speaking on your own behalf, in particular write in the first person and use a personal e-mail address.

If you disclose that you are an employee of ours, you must state that your views do not represent those of your employer. For example, you could state, *"the views in this posting do not represent the views of my employer"*. Remember that you are personally responsible for what you communicate in social media.

If it is unclear where we stand on certain "hot" topics you are obligated to ask the Marketing Manager for clarification before sharing any content on social media. They hold the right to deny any posting or sharing of content of a particular topic if they believe it will publicly oppose the business's position.

Often, materials published will be widely accessible by the public and will remain accessible for a long time. If you are uncertain or concerned about the appropriateness of any statement or posting, you should discuss it with the Marketing Manager before making the post.

5. Monitoring of Social Media Use

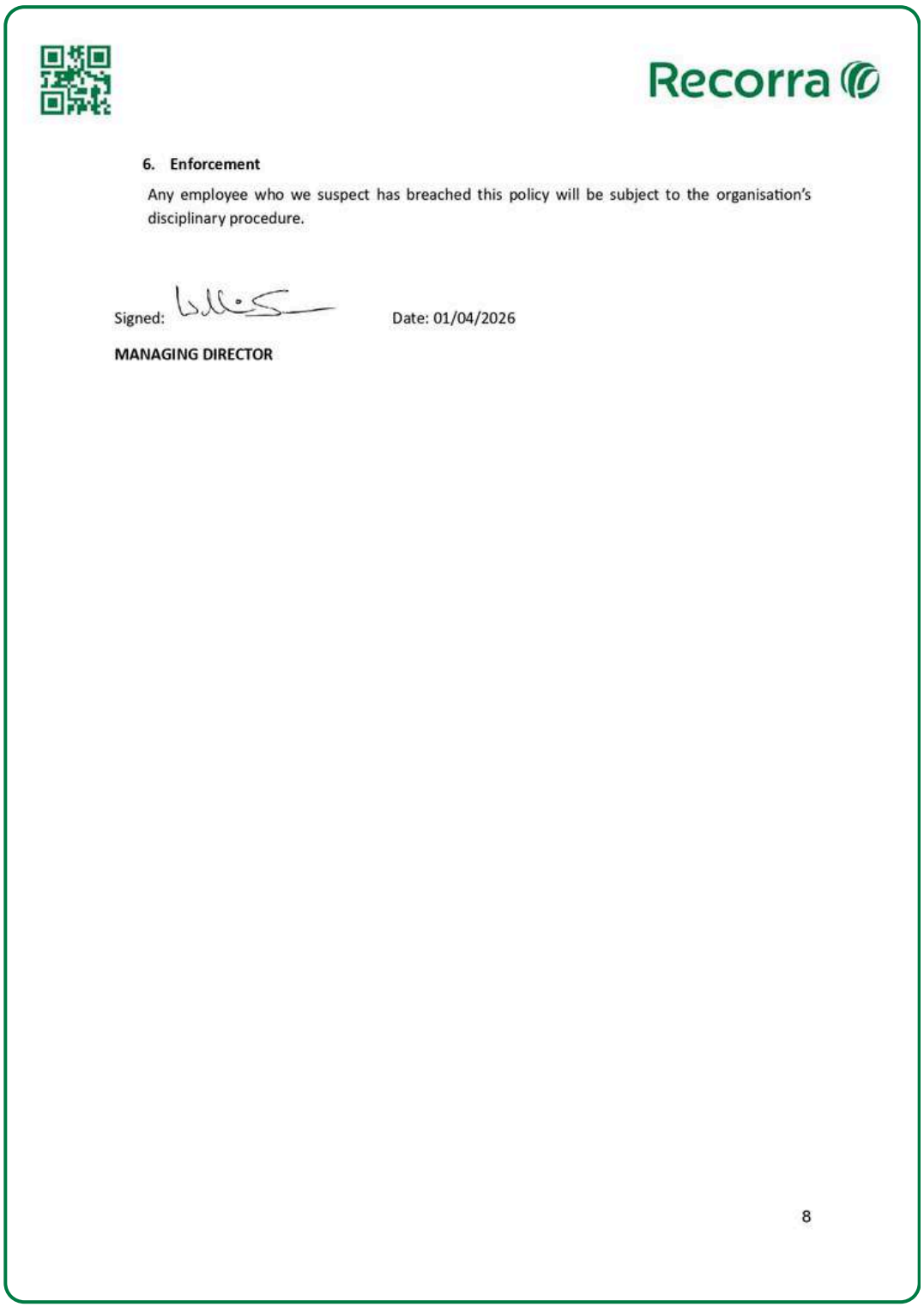
It is recommended that all employees use strict privacy settings on their social network profiles.

The organisation monitors your internet usage regularly and may undertake more in depth monitoring where considered necessary. This includes monitoring the websites you visit and any other matters referred to in this policy. This includes monitoring of any additional accounts you may be requested to set up for the purposes of performing your work tasks, which are subject to the same rules as your work email account.

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Policies

Use of Computer, Email and Internet



Recorra

6. Enforcement

Any employee who we suspect has breached this policy will be subject to the organisation's disciplinary procedure.

Signed: Date: 01/04/2026

MANAGING DIRECTOR

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Policies

Waste Disposal

Recorra

Recorra Ltd – WASTE DISPOSAL POLICY

Recorra recognises that if wastes are not effectively segregated, securely contained and disposed of in a legal and responsible manner, they can damage the environment and present health and safety risks.

It is our policy to:

- Identify appropriate waste streams
- Correctly segregate different types of waste
- Introduce new recycling streams for different types of waste that are being disposed of as general waste; increasing to 38 waste streams in 2026
- Provide suitable storage arrangements for each type of waste, to ensure waste is secure and does not escape
- Clearly identify stored wastes by labelling containers with their contents or storing according to a set plan documented in operating procedures
- Keep records of the quantity and composition of different wastes; on a quarterly basis with submission to the Environment Agency
- Only transfer waste to licensed disposal sites or a contractor with authority to take it
- Pass a description of the waste to the person removing the waste
- Keep copies of transfer/consignment notes covering the movements of waste, ensuring all documentation is accurate and complete
- Correctly and effectively maintain suitable storage arrangements for waste and undertake periodic checks upon them
- Transport wastes by the most appropriate economic means, in order to reduce the use of fossil fuels, reduce pollution and minimise the impact on the environment
- Ensure that all residual waste that cannot be recycled is sent to an energy from waste facility, in line with our zero to landfill policy
- Ensure all material buyers are located within the United Kingdom or European Union

This policy will be reviewed on an annual basis.

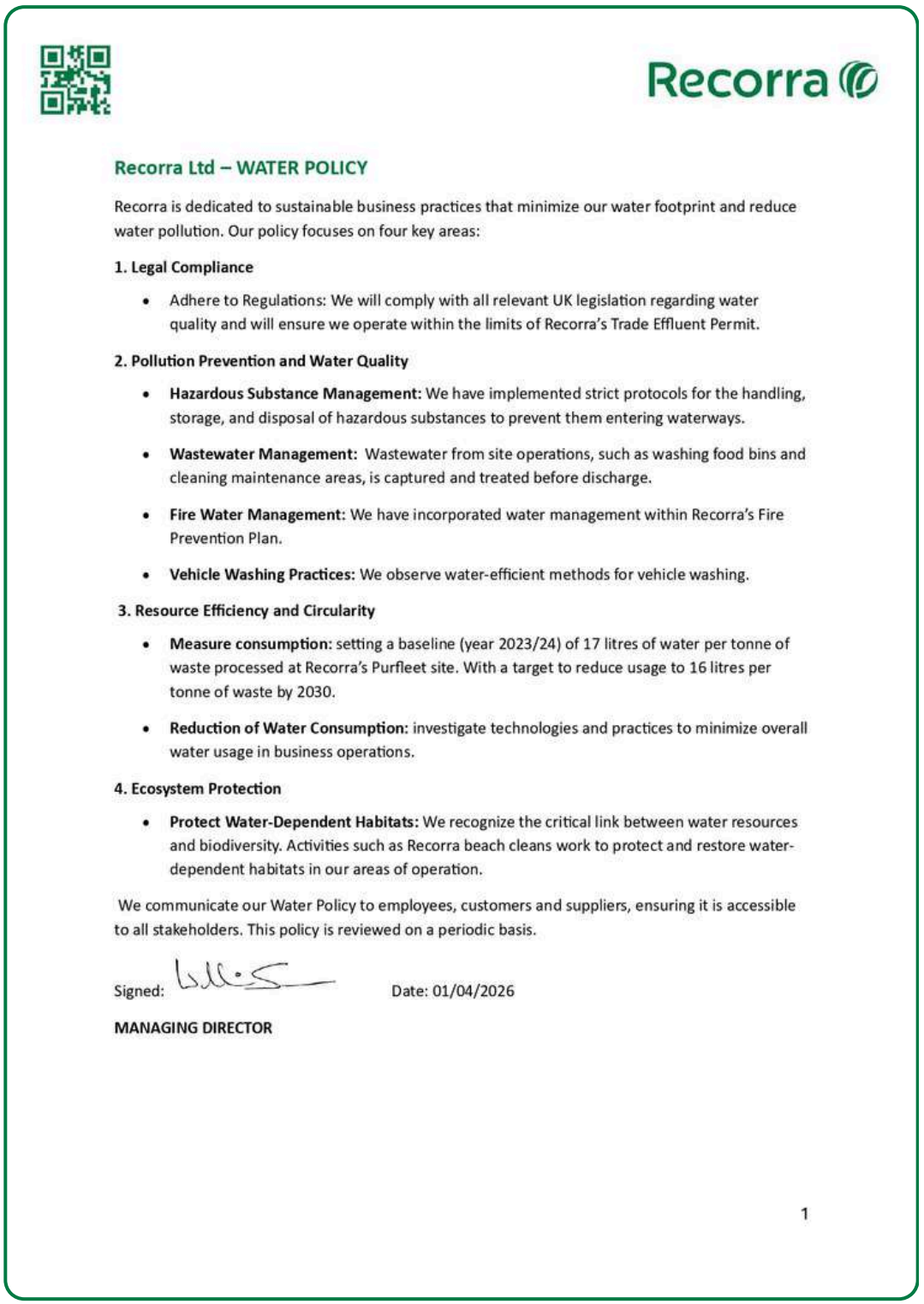
Signed: Date: 01/04/2026

MANAGING DIRECTOR

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Policies

Water



Recorra

Recorra Ltd – WATER POLICY

Recorra is dedicated to sustainable business practices that minimize our water footprint and reduce water pollution. Our policy focuses on four key areas:

1. Legal Compliance

- Adhere to Regulations: We will comply with all relevant UK legislation regarding water quality and will ensure we operate within the limits of Recorra's Trade Effluent Permit.

2. Pollution Prevention and Water Quality

- **Hazardous Substance Management:** We have implemented strict protocols for the handling, storage, and disposal of hazardous substances to prevent them entering waterways.
- **Wastewater Management:** Wastewater from site operations, such as washing food bins and cleaning maintenance areas, is captured and treated before discharge.
- **Fire Water Management:** We have incorporated water management within Recorra's Fire Prevention Plan.
- **Vehicle Washing Practices:** We observe water-efficient methods for vehicle washing.

3. Resource Efficiency and Circularity

- **Measure consumption:** setting a baseline (year 2023/24) of 17 litres of water per tonne of waste processed at Recorra's Purfleet site. With a target to reduce usage to 16 litres per tonne of waste by 2030.
- **Reduction of Water Consumption:** investigate technologies and practices to minimize overall water usage in business operations.

4. Ecosystem Protection

- **Protect Water-Dependent Habitats:** We recognize the critical link between water resources and biodiversity. Activities such as Recorra beach cleans work to protect and restore water-dependent habitats in our areas of operation.

We communicate our Water Policy to employees, customers and suppliers, ensuring it is accessible to all stakeholders. This policy is reviewed on a periodic basis.

Signed: Date: 01/04/2026

MANAGING DIRECTOR

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Associations

Trade Associations & Memberships





























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