

WASTE MANAGEMENT POLICY

Approved by: Guy Wakeley CEO
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Reconomy
Group



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1 INTRODUCTION

Reconomy Group is an innovative, tech-led provider of circular economy-focused services, with the purpose of creating a truly sustainable world by conserving finite resources. Supporting businesses around the world to improve their Environment, Social and Governance (ESG) outcomes, Reconomy Group delivers services through three main verticals – Recycle, Comply and Re-use.

Due to the diverse nature of activities undertaken Reconomy Group, a wide variety of wastes are produced and collected, ranging from general wastes and recyclable materials, through to special and hazardous wastes. The Company has a duty to ensure that all wastes are disposed of responsibly and with the least environmental impact. This policy sets down the framework for all waste management carried out by Reconomy Group.

2 POLICY STATEMENT

The Group will adopt the principles of the 'best practicable environmental option' in the delivery of its waste management services. The Group will apply a 'waste hierarchical approach', to reduce, reuse, recycle and recover waste products in preference to the disposal of waste to landfill.

In our global organisation, the way our commitment is brought to life may vary country by country in line with local legislation and cultural values; however, the core intent applies across Reconomy, and to all colleagues who work for our organisation. We also expect our suppliers and partners to share our values relating to waste management, and to contribute to our progress on this agenda.

3 POLICY OBJECTIVES

The objectives of this policy are:

- To ensure that waste management is performed in accordance with all waste legislative requirements, including the duty of care, and to plan for future legislative changes and to mitigate their effects.
- To minimise waste generation at source and facilitate repair, reuse, and recycling over the disposal of wastes, where it is cost effective.
- To provide clearly defined roles and responsibilities to identify and co-ordinate each activity within the waste management chain.
- To promote environmental awareness to increase and encourage waste minimisation, reuse, and recycling.
- To ensure the safe handling and storage of wastes at all Group locations.
- To provide appropriate training for staff, supply chain partners and clients on waste management issues.
- To promote industry waste management best practice.
- To appoint competent person(s) to provide waste management advice.

4 SCOPE

This policy applies to all activities undertaken by (or on behalf of) Reconomy Group including its staff, supply chain partners and clients.

5 RESPONSIBILITIES

The responsibilities and organisational arrangements for this Waste Management Policy lie with a variety of personnel within the Group.

5.1 The Chief Executive Officer

The CEO is accountable to the Board for the Waste Management and Environmental performance of the Group. They will be required to:

- Ensure the Group has a comprehensive, up to date Waste Management policy and Environmental policy that meets statutory obligations.
- Ensure that the policies contain a demonstration of their personal commitment by the inclusion of a signed and dated Policy Statement.
- Review the Policies to ensure that they remain comprehensive, relevant, and up to date.
- Assign duties to key personnel to apply the Policies throughout the Group.

5.2 Directors / Managing Directors of Reconomy Group Businesses

All Directors and Managing Directors of Reconomy Group Businesses are accountable to the CEO for the implementation of this Policy in their respective functions. This will require them to:

- Demonstrate their implementation of the requirements of this Policy.
- Ensure that the personnel under their control are competent and provided with adequate support, supervision, information, instruction, and training to execute their work without risk to the environment and abiding by the contents of waste management plans specific to the projects that they work on.
- Ensure that all activities for which they are responsible, including pre-contract and office processes are, where appropriate, subject to the production of a site waste management plan, formal hazard identification and risk assessment.
- Ensure the implementation of each Company's environmental management system (if applicable) and waste management policy.

5.3 HR Director

The HR Director is accountable to the CEO for implementing the relevant requirements of this Policy. This will require them to:

- Liaise with Directors, in monitoring the training needs of employees.
- Maintain records of employee environmental and health & safety training.
- Provide all new employees with a copy of this Policy.

5.4 Account Managers and Team Leaders

All managers and team leaders are accountable through the recognised chain of line management for implementing this Policy. Managers and team leaders are required to:

- Be familiar with and demonstrate their commitment to this Policy and promote continuous waste management performance.
- Where appropriate instigate a formal hazard identification and risk assessment for the activities under their control.
- Ensure that a project waste management plan is published, maintained, and complied with for their Project and distributed to all relevant parties.
- Ensure that no toxic, noxious or offensive substance is discharged into the atmosphere, watercourse, or land.

5.5 Bids and Tender Team

They will:

- Consider at time of tender, the information contained in the enquiry related to waste management issues.
- Consider the possible impacts on the project by current legislation, approved codes of practice and other specific site constraints.

5.6 Employees

All employees are accountable through the management structure for conforming to the requirements of this policy and of statutory requirements. Every employee is required to:

- Take care and attention of the environment.
- Co-operate in fulfilling the Group's pursuit of continuous environmental and waste management improvement.
- Co-operate in training to improve awareness of waste management principles and applications.
- Be familiar with and implement this policy.
- Conform to the requirements of the environmental management plan, where applicable.

6 POLICY REVIEW AND ENFORCEMENT

All staff are obligated to comply with this Policy; any breach of this Policy may result in disciplinary action.

This Policy will be reviewed on an annual basis. If the Policy is amended, you will be notified of the change(s).

This Policy should be read and understood in conjunction with the following policies:

- Reconomy Group Sustainability Policy
- Reconomy Group Environment Policy

Signature:



Name of Signatory: Guy Wakeley
Position: Chief Executive Officer
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