



Compliance Pack

Contents

ISO 9001	3
ISO 14001	4
ISO 45001	5
Incorporation Certificate	6
CHAS	7
SafeContractor	8
Waste Carriers License	10
Insurance Cover Letter/Insurance Details	11
Health & Safety Policy	12
Environmental Policy	21
Quality Policy	22
Anti-Corruption & Bribery Policy	23
Anti-Slavery & Human Trafficking Policy	29
Equal Opportunities Policy	32



QuServe Quality Consultancy Ltd hereby certifies that:

Natwaste Ltd

Has been assessed and approved in meeting the requirements of

ISO 9001:2015

On 7th November 2023

Permissible Exclusions:
8.3 - Design & Development

Scope of Approval:

The Management of Waste and Recycling Logistic Services for Commercial and Domestic

EAC: 24 NACE: E. 38.1

for QuServe Quality Consultancy Ltd

Director: *P. Plumridge*

Registration Number: 2020/102
September 2023

Expiry: 7th November 2026

ISO 9001 Quality Management System





QuServe Quality Consultancy Ltd hereby certifies that:

Natwaste Ltd

Has been assessed and approved in meeting the requirements of

ISO 14001:2015

On 7th November 2023

Permissible Exclusions:
None

Scope of Approval:

The Management of Waste and Recycling Logistic Services for Commercial and Domestic

EAC: 24 NACE: E.38.1

for QuServe Quality Consultancy Ltd

Director: *P. Plumridge*

Registration Number: 2020/103

Expiry: 7th November 2026

ISO 14001 Environmental Management System





QuServe Quality Consultancy Ltd hereby certifies that:

Natwaste Ltd

Has been assessed and approved in meeting the requirements of

ISO 45001:2018

On 7th November 2023

Permissible Exclusions:
None

Scope of Approval:

The Management of Waste and Recycling Logistic Services for Commercial and Domestic

EAC: 24 NACE: E.38.1

for QuServe Quality Consultancy Ltd

Director: *P. Plumridge*

Registration Number: 2020/104

Expiry: 7th November 2026

ISO 45001 Health & Safety Management System





**CERTIFICATE OF INCORPORATION
OF A
PRIVATE LIMITED COMPANY**

Company Number **9098099**

The Registrar of Companies for England and Wales, hereby certifies that

NATWASTE LIMITED

is this day incorporated under the Companies Act 2006 as a private company, that the company is limited by shares, and the situation of its registered office is in England and Wales.

Given at Companies House, Cardiff, on **23rd June 2014**.

The above information was communicated by electronic means and authenticated by the
Registrar of Companies under section 1115 of the Companies Act 2006



Companies House



THE OFFICIAL SEAL OF THE
REGISTRAR OF COMPANIES



Set the Standard | Est. 1997

Standard



Certificate of Compliance

This is to certify that

Natwaste Ltd

Membership No.: CHAS-100372

Deem to Satisfy

SSIP Approved (NOT A CDM DUTYHOLDER)

has demonstrated compliance with the CHAS standards in line
with SSIP Core Criteria and UK H&S Legislation.

Full SSIP Core Criteria assessment carried out by SafeContractor
with originating expiry date 08/07/2027

Colby Lane
Chief Executive Officer



CERTIFICATE VALID UNTIL	08/07/2027
CERTIFICATE DATE OF ISSUE	24/07/2026
DATE OF INSPECTION	24/07/2026
CERTIFICATE NUMBER	2F6F204F-FA2F-4B0B-96D6-2E654FA1434B

0345 521 9111

CHAS.co.uk



Set the Standard | Est. 1997

Certificate of Compliance

This is to certify that

Natwaste Ltd

Membership No.: CHAS-100372

has been awarded certification after demonstrating compliance with the
CHAS Advanced standards

Colby Lane
Chief Executive Officer

CERTIFICATE VALID UNTIL	08/07/2027
CERTIFICATE DATE OF ISSUE	29/07/2026
DATE OF INSPECTION	29/07/2026
CERTIFICATE NUMBER	627584E5-9556-4641-B325-653E2E58BA6B

veriforce®
CHAS®

Advanced

0345 521 9111

CHAS.co.uk





Certificate of Approval

This is to certify that

NatWaste Ltd

has achieved SafeContractor approval

Date: 8th July 2026

This certificate is valid until: 8th July 2027

Certificate number: MI7056

Signed:

Tim Jackson
SafeContractor CEO

A handwritten signature in black ink that reads "Tim Jackson".

23043



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.ssiportal.org.uk/>



Schedule to SafeContractor certificate

This SafeContractor certificate is awarded for the following services:

Work Categories:

Waste Services: Waste Broker

Industry Roles:

Non-Construction Contractor

Category Related Activities:

Full validation of this certificate should be made via the SSIP Portal www.ssiportal.org.uk

SafeContractor approval has been achieved following an assessment of the contractor's health & safety documentation, and compared against the **SafeContractor** Assessment Standards, which set out the health & safety standards required to achieve approval.

For more information on the Assessment Standards, the **SafeContractor** scheme or for confirmation of this contractor's approval please telephone **SafeContractor** on 029 2026 6749.

www.safecontractor.com



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

Regulation authority

Name



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

NATWASTE LIMITED

Registered as

An upper tier waste broker and dealer

Registration number

CBDU180067

Address of place of business

NATWASTE LTD
BERMAR HOUSE
RUMER HILL ROAD
CANNOCK
WS11 0ET
United Kingdom

Date of registration

19 May 2026

Expiry date of registration (unless revoked)

30 June 2029

This certificate was created on 19 May 2026. 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 1 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.



CERTIFICATE OF EMPLOYERS' LIABILITY INSURANCE

In accordance with the requirement of regulation 5 of the Employers' Liability (Compulsory Insurance) Regulations 1998 as amended by regulation 2 of the Employers' Liability (Compulsory Insurance) Regulations 2008 (the Regulations), the policyholder who has been issued with this certificate must display one or more copies of this certificate at each place of business at which the policyholder employs any relevant employee of the class or description to which this certificate relates. This requirement will be satisfied if this certificate is made available in electronic form and each relevant employee to whom it relates has reasonable access to it in that form.

Policy No.	88574149
1. Name of policy holder:	NATWASTE LTD
2. Date of commencement of insurance:	08/09/2026
3. Date of expiry of insurance:	07/09/2027

We hereby certify that subject to paragraph 2:-

1. the policy to which this certificate relates satisfies the requirements of the relevant law applicable in Great Britain Northern Ireland and the Channel Islands or the Isle of Man (b); and
2. the minimum amount of cover provided by this policy is no less than £5 million (c);

Notes

- (a) Where the employer is a company to which regulation 3(2) of the Regulations applies, this certificate shall state in a prominent place, either that the policy covers the holding company and all its subsidiaries, or that the policy covers the holding company and all its subsidiaries except any specifically excluded by name, or that the policy covers the holding company and only the named subsidiaries.
- (b) Specify applicable law as provided for in regulation 4(6) of the Regulations.
- (c) See regulation 3(1) of the Regulations and delete whichever of paragraphs 2(a) or 2(b) does not apply. Where 2(b) is applicable, specify the amount of cover provided by the relevant policy.

Signed for and behalf of American International Group UK Limited

Christopher Rash - UK Chief Executive Officer

American International Group UK Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority (FRN number: 781109). This information can be checked by visiting the FS Register (www.fca.org.uk/register). American International Group UK Limited is registered in England: company number 10737370. Registered address: The AIG Building, 58 Fenchurch Street, London EC3M 4AB. In order to run and operate our business, we collect, use and disclose Personal Information. You can find out more about how we use Personal Information by reading our Privacy Policy available at www.aig.co.uk/privacy-policy or by writing to Data Protection Officer, by email at: dataprotectionofficer.uk@aig.com

To report an incident

Call **020 8680 7254**
Email **ClaimsUK@AIG.com**

HEALTH & SAFETY POLICY

General Statement of Policy

The Management of the company regards the promotion of health and safety measures as a mutual objective for management and employees at all levels.

We are committed to the prevention of personal injury and damage to property and the elimination of hazards and risks. We commit to protect everyone (including the public, in so far as they come into contact with the company or its products) from foreseeable work hazards. At all times, safety will take precedence over expediency, and we (The Company) recognise its health and safety duties under the Health and Safety at Work Act 1974, the Management of Health & Safety at Work Regulations 1999 and accompanying protective legislations.

In particular the company has a responsibility to:

- Comply with legal & other requirements to which the business subscribes including the international standard ISO 45001:2018.
- Assess and monitor the risks to the Health & Safety of our employees and provide and maintain safe and healthy working conditions, taking account of any current statutory requirements and other requirements (as applicable) in order to provide the framework to set our OH&S Objectives.
- Provide training and instruction to enable employees to perform their work safely and efficiently.
- Make available all necessary safety devices and protective equipment and to supervise their use.
- Commitment to consultation and participation of workers
- Maintain a constant and continuing interest in health and safety matters applicable to the company's activities in order to continually improve ensuring our Management set an example in safe behaviour.
- Review the policy periodically and notify employees of substantive changes communicating this policy both internally and on the company's website.

Employees have a duty to co-operate in this objective by:

- Working safely and efficiently.
- Using the protective equipment provided and by meeting statutory obligations.
- Reporting incidents that have led or may lead to injury or damage.
- Adhering to company procedures jointly agreed on their behalf, for securing a safe workplace.
- Assisting in the investigation of accidents with the object of introducing measures to prevent a recurrence.



Signed.....

Print Name..... SEAN MERRETT.....

Position in Company..... MANAGING DIRECTOR.....

Date Approved.....09.02.26.....

Review Date.....09.02.28.....

About this Policy

This document details the Company's general health and safety arrangements and strategy, and the procedures by which good and consistent standards are maintained.

This Health & Safety policy is intended to give an overview which apply to the Company in general. Specific arrangements for ensuring health and safety throughout the Company are detailed in the Company Handbook, and task-specific risk assessments and procedures.

It is the policy of NATWASTE LIMITED (We, Our, Us), including all and any trading names connected with them, to pursue and promote at all levels of employment within our workforce measures which shall aim to ensure and protect the health and safety of all employees and any other persons connected with our operations including:

Customers and Clients
Suppliers
Contractors
Visitors

This policy applies to all employees.

Status of this Policy

This policy does not form part of any contract of employment.

We have consulted with staff members in respect of the creation and implementation of this policy.

Our Health and Safety Standards

The implementation of this policy will fulfil all and any legislative requirements which we are subject to through ensuring:

- That all reasonable and practical steps and measures are taken to safeguard the health, safety and welfare of all Staff Members while at work.
- That the safety and health of any members of the public, or any other persons who may visit sites and locations where we carry out its business operations, is protected so far as is reasonably practicable.
- That sufficient measures are implemented by us to prevent accidents and cases of work-related ill health by managing the health and safety risks in the workplace.
- Provision of clear and adequate information, instructions and training to all Staff Members to ensure that they are competent to carry out their work in a responsible and safe manner.
- Implementation of emergency procedures in case of significant events, such as fires etc, which threaten the health and safety of Staff Members and others.

-That we maintain safe and healthy working conditions, provides and maintains all necessary equipment and any other goods or tools which are necessary for Staff Members to carry out the duties of their role with us.

- We shall ensure safe storage and handling of any and all substances and products which may cause harm to Staff Members who are required to use them during the course of their work.

Health and Safety Information

Personnel

Ultimate responsibility for health and safety rests with the Company Director Mr Sean Merrett (hereafter referred to as the Health & Safety Director). To assist the Health & Safety Director, Phil Thomas (Operations Manager) manages Health and Safety day-to-day (hereafter referred to as the Health & Safety Manager)

However, to aid compliance with its duties under the Management of Health & Safety at Work Regulations 1999, the Company retains the services of QuServe Consultants, to advise and assist with aspects of health and safety management.

Communication

Effective consultation between management and employees is to be actively encouraged with regard to matters of the Health, Safety and Well-being of all employees. The Company recognises that a key measure towards safe-working practices is effective communication.

A copy of this Health & Safety policy is supplied to new employees as part of their Induction.

We hold monthly H&S Toolbox Talks with employees, whereby all aspects of Health & Safety are discussed, if necessary amendments to policies and procedures are communicated.

A copy of this policy is displayed in the Foyer and Staff Room within the office, and a copy is also made available on our website.

Risk Assessments

Relevant risk assessments shall be completed and actions arising out of those assessments shall be implemented where necessary. Where working habits or conditions change risk assessments shall be reviewed. This shall be the responsibility of the Health & Safety Manager.

Training

It is the responsibility of the Health & Safety Director to ensure that adequate training has been carried out,

Specific training takes the form of either:

1. the formal course provided by a suitably qualified or accredited instructor, or
2. informal instruction given by either the Health & Safety Director and or Manager

Training needs are continually assessed according to the current qualifications or experience of the workforce, the introduction of new equipment, and changing Company circumstances.

It is the responsibility of all employees to ensure that they do not undertake tasks for which they have received insufficient or no training. Further training or instruction should be requested where necessary.

Fire Safety

All Staff Members and any other persons to whom this policy applies should ensure that they familiarise themselves with our fire safety procedures (including the location of all fire exits and fire equipment).

Our fire safety procedures are displayed in the Main Office and Staff Room.

We shall ensure that all Staff Members receive adequate training to ensure that they are aware of all procedures which must be followed in the event of a fire. Fire drills will take place every 6 months.

All relevant and necessary signage and fire equipment for the protection and safety of Staff Members and any other persons entering and present on our premises will be displayed clearly and updated/maintained as necessary. Escape routes shall be well signed and kept clear at all times. Evacuation plans and procedures will be tested from time to time and updated as necessary. We shall ensure that our fire safety risk assessment is kept up to date regularly.

This shall be the responsibility of the Health & Safety Manager.

First-Aid and Accidents

We shall ensure that any work-related injuries or accidents are dealt with properly and investigated as appropriate. We shall ensure that full records are kept of any accidents and that these are reported to the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) database as appropriate.

Our accident book is located in the Kitchen.

A First-aid box is also located in the Kitchen

Our first-aid notice contains relevant information in relation to first-aid. The first-aid notice is located in the Main Office and Staff Room.

The person who has been appointed with the responsibility of all first-aid arrangements is the Health & Safety Manager

All accidents or workplace injuries should be reported to the above-named person as soon as is reasonably practicable.

Public Health Emergencies and Infectious Diseases

We shall always ensure that our working environment and spaces which are accessible to the public are kept clean and properly ventilated.

Staff Members are reminded to regularly wash hands and maintain good standards of hygiene in order to minimise the spread of infectious diseases.

In the event of any public health emergency, we shall adjust working conditions accordingly and shall consult all applicable government advice.

Our Covid-19 policy is located in the Staff Room.

All matters relating to the prevention of infectious diseases any public health emergency shall be the responsibility of the Health & Safety Director.

Screens and Computers

All Staff Members who use computer screens and other forms of screens as a significant part of their role:

- Are encouraged to take regular breaks.
- Shall receive training and information to reduce the risks posed by regular use of screens.
- Are entitled to a workstation assessment in order to reduce any risks which may be present. This may be required from the person listed below.
- Shall be entitled to eyesight tests at our expense.

All issues relating to the use of screens is the responsibility of the Health & Safety Manager.

Facilities

All relevant facilities such as:

Toilets;
Taps with drinking water;

shall be provided and maintained by us. We shall ensure that these facilities are always safe to use through a system of routine inspection and cleaning and will take appropriate action where any defects are found. This shall be the responsibility of the Health & Safety Manager.

Equipment and Machinery

Implementation of systematic inspections and testing of our equipment and machinery and ensuring that any necessary action is carried out promptly and efficiently where problems or defects are uncovered. All faults should be reported to the person listed below as soon as they are discovered.

The person responsible for the safe and proper functioning of equipment and machinery is the Health & Safety Manager

Personal Protective Equipment

It is the responsibility of the Health & Safety Manager to ensure that sufficient and adequate personal protective clothing and equipment (PPE) is supplied according to the nature of the tasks to be undertaken, and that this equipment is suitable for use, compatible with other items of PPE and clothing, and CE marked where appropriate. It is also the responsibility of management to ensure appropriate items of PPE are worn by employees (direct or indirect) under their control.

It is the responsibility of all employees to abide by the rules laid down for that site, and wear the PPE provided in the manner intended.

It is the responsibility of management at all levels to discipline non-compliance, and to set a personal example by wearing appropriate PPE on site and/or as necessary.

It is the responsibility of all employees to store and care for their PPE in the correct manner, to regularly inspect the items for damage, and to request replacements when necessary.

Personal Safety

Use of personal audio equipment is strictly prohibited in the workplace; When on sites/depots, use of personal mobile phones is prohibited in the workplace unless specifically authorised by site/depot management, and then only when safe to do so.

Use of mobile phones (other than hands-free) whilst driving is prohibited; use of hands-free mobile phone equipment whilst driving is discouraged.

Smoking is banned in all workplaces, including all sites/depots unless a specific area has been designated as a 'smoking zone/shelter', and company vehicles. It is Company policy that this ban includes e-cigarettes.

It is the responsibility of the Health & Safety Director to ensure that prohibitions and such rules are observed, and to discipline non-compliance.

Control of Sub-Contractors/ Supply Chain

It is the responsibility of the Health & Safety Manager to ensure that only those sub-contract companies who can demonstrate competency for the work will be considered for inclusion on the Company Approved List

Currently, entry onto the Approved List is reliant on either:

- 1) proven health & safety performance on site or
- 2) an assessment initially by questionnaire

The Health & Safety Manager is responsible for ensuring that the system is monitored and effective.

The Health & Safety Manager is also responsible for ensuring that all Sub-contractors and Suppliers are made aware of risks and control measures as detailed within Company and site rules, and relevant site specific / depot specific risk assessments.

COSHH Assessment

Common substances and products have been previously assessed; generic COSHH assessments are held by the Company. For unfamiliar substances or products, data sheets are sought from the supplier and specific COSHH assessments carried out.

Information from all assessments concerning the use, handling and storage of substances and products is disseminated to those on site through induction or toolbox talks, including strict instruction never to use a substances until sufficient instruction has been given, never to deface or remove a label, and to always ask if unsure.

Manual Handling

Due consideration is given to the weight, size and shape of all items to be handled. Following assessment, mechanical means are used or assistance provided where necessary in line with the Manual Handling Regulations 1992 (as amended).

However, where manual handling is unavoidable, manual handling instruction is reiterated for all employees (refer to the Health & Safety Manual) and compliance monitored on site. Tasks are matched to the individual's capabilities and the site environment.

Additional Actions

Other relevant actions that shall be taken are:

The business implements a sign in and out system for visitors, so that it is easy to identify who is on site in the event of a fire or other safety event.

These shall be the responsibility of the Health & Safety Manager

Duties of Staff Members

All Staff Members have a duty to cooperate in the implementation of this policy and to assist in ensuring that we maintain a safe working environment. All Staff Members have a duty to:

- Work and conduct themselves in a manner that promotes and ensures their own safety and the safety of others.
- Follow and obey procedures and practices that have been designed and implemented by us to ensure safe and healthy working conditions.
- Use any machinery, equipment goods, tools and safety devices in accordance with the relevant product instructions and in accordance with any specific training which has been issued.
- Handle or use any substance in accordance with the relevant product instructions and in accordance with any specific training which has been issued in relation to that substance.
- Report any accident, injury or any other working condition which they believe to be unsafe or of immediate danger to the appropriate person (as described above).
- Assist with any necessary investigations of accidents with the aim of introducing new measures to prevent reoccurrence.

General Health and Safety Information

The approved health and safety poster is displayed in the Foyer

Updates to this Policy

This policy shall be reviewed annually and shall be updated where appropriate.



Signed.....

Print Name..... SEAN MERRETT

Position in Company..... MANAGING DIRECTOR

Date Approved 09.02.26

Review Date 09.02.28

ENVIRONMENTAL POLICY

General Statement of Policy

It is the policy of NatWaste Limited to integrate environmental management into our day to day business activities and operations. We will manage our activities in a manner that protects the environment, the safety of our staff and public health.

Guided by our policy, we recognise and will exercise our responsibilities to:

- Comply with legal & other requirements to which the business subscribes including the international standard ISO 14001:2015.
- Commit to achieving measurable continuous improvement through our environmental management programme and strategic direction for the business.
- Prevent pollution by using alternative measures in our facility.
- Provide the appropriate resources including training of staff to ensure they are environmentally responsible.
- Review and set objectives/targets on an annual basis ensuring they are measurable and achievable.
- Monitor performance through the internal audit process.
- Communicate and reinforce this policy throughout the organisation through the use of notice boards, induction training and on-going training.
- Make this policy available to the public.
- Display this policy throughout our business.



Signed.....

Print Name..... SEAN MERRETT

Position in Company..... MANAGING DIRECTOR

Date Approved..... 09.02.26

Review Date..... 09.02.28

QUALITY POLICY

General Statement of Policy

NatWaste is committed to providing the highest quality service by listening to our customers and continually reviewing our processes in line with business needs, thus maximising the efficiency of our QUENSH System (**QU**uality, **EN**vironment and **S**afety & **H**Health). The principal elements of our policy are: -

To develop and maintain a QUENSH System satisfying the requirements of BS EN ISO 9001: 2015 which forms the framework for achieving continual improvement, complete customer satisfaction and full realisation of all company objectives in accordance with our strategic direction.

- To focus on the requirements of customers, establishing levels of communication capable of fully determining their needs and expectations.
- To establish and maintain an infrastructure capable of supporting all company activities and realising all company objectives.
- To identify scope for improvement in every aspect of the company's activities, devising and implementing effective solutions throughout.
- To satisfy applicable legal requirements.
- Regularly audit our internal processes
- Review and act on audit results, stakeholder feedback and complaints
- Make this Policy available to all Interested Parties

Implementation of the Quality Policy is the responsibility of every member of staff throughout the organisation, supported by our processes and training structure.



Signed.....

Print Name..... SEAN MERRETT.....

Position in Company..... MANAGING DIRECTOR.....

Date Approved..... 09.02.26.....

Review Date..... 09.02.28.....

Anti-Corruption and Bribery Policy

General Statement of Policy

1. Policy statement

1.1 It is the policy of NatWaste Ltd to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, wherever we operate, and implementing and enforcing effective systems to counter bribery.

1.2 NatWaste Ltd will uphold all laws relevant to countering bribery and corruption in all the jurisdictions we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect to our conduct both at home and abroad.

1.3 The purpose of this policy is to:
set out our responsibilities, and the responsibilities of those working for us, in observing and upholding our position on bribery and corruption; and
provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

1.4 Bribery and corruption are punishable for individuals by up to ten years' imprisonment and, if we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

1.5 In this policy, third party means an individual or organisation you come into contact with during the course of your work with us. This includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers and government and public bodies, including their advisers, representatives and officials, politicians and political parties.

2. Who is covered by the policy

The policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed term or temporary), consultants, contractors, trainees, seconded staff, home workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as workers in this policy).

3. What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. Here are some examples:

Offering a bribe

You offer a potential client a ticket to a major sporting event, but only if they do business with us.

This would be an offence, as you are making the offer to gain a commercial gain and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

Receiving a bribe

A supplier gives your nephew a job, but makes it clear in return they expect you to use your influence within the organisation to ensure we continue to do business with them. It is an offence for the supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

Bribing a foreign official

You arrange for the business to pay an additional payment to a foreign official to speed up an administrative process, such as clearing our goods through customs. The offence of bribing a foreign public official has been committed as soon as the offer is made. This is because it is made to gain a business advantage.

4. Gifts and hospitality

4.1 This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.

4.2 You are prohibited from accepting a gift from or giving a gift to a third party, or giving or receipt of gifts is not prohibited, if the following requirements are met:

- it 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, or inexplicit or implicit exchange for favours or benefits;
- it complies with local law;
- it is given in our name, not in your name;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances, e.g. in the UK, it is customary for small gifts to be given at Christmas time;
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time; and
- it is given openly, not secretly.

4.3 We appreciate that the market practice of giving business gifts varies between countries and regions, and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

5. What is not acceptable

It is not acceptable for you (or someone on your behalf) 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 business already given;
- give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to 'facilitate' or expedite a routine procedure;

- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

6. Facilitation payments and kickbacks

6.1 NatWaste Ltd do not make, and will not accept, facilitation payments or 'kickbacks' of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK, but are common in some other jurisdictions in which we operate.

6.2 If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reasons for payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the compliance manager.

6.3 Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

7. Donations

We do not make contributions to political parties, but these are never made in an attempt to influence any decision or to gain a business advantage, and are always publicly disclosed. We do make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the compliance manager.

8. Your responsibilities

8.1 You must ensure that you read, understand and comply with this policy.

8.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

8.3 You must notify your manager or your compliance manager or the confidential helpline as soon as possible, if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business.

8.4 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for Gross Misconduct. We reserve the right to terminate our contractual relationship with other workers if they breach this policy.

9. Record keeping

9.1 We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to a third party.

9.2 You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

9.3 You must ensure that all expenses claims relating to hospitality, gifts or expenses incurred to third parties, are submitted in accordance with our expenses policy and specifically record the reason for expenditure.

9.4 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept 'off book' to facilitate or conceal improper payments.

10. How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your manager or the compliance manager or through the confidential helpline. Concerns should be reported by following the procedure set out in our Whistle Blowing Policy. A copy of the Whistle Blowing Policy can be found in the HR Manual.

11. What to do if you are a victim of bribery or corruption

It is important that you tell the compliance manager or the confidential helpline as soon as possible, if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

12. Protection

12.1 Workers who refuse to offer or accept a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

12.2 We are committed to ensuring no one 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 other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissals, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe you have suffered any such treatment, you should inform the compliance manager immediately. If this matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure which can be found in the Employee Handbook.

13. Training and communication

13.1 Training on this policy forms part of the induction process for all new employees and other workers. All existing employees and workers will have received regular, relevant training on how to implement and adhere to this policy.

13.2 Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of the business relationship with them and as appropriate thereafter.

14. Who is responsible for this policy

14.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

14.2 The compliance manager has day to day responsibility for implementing this policy, and for monitoring its use and effectiveness, and dealing with any queries on its interpretation. Management, at all levels, are responsible for ensuring those reporting to them are made aware of, and understand, this policy and are given adequate and regular training on it.

15. Monitoring and review

15.1 The compliance manager will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits, to provide assurance that they are effective in countering bribery and corruption.

15.2 All workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

15.3 Workers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the compliance manager.

15.4 This policy does not form part of any employee's contract of employment and it may be amended at any time.

Potential risk scenarios: 'red flags'

The following is a list of possible red flags that may arise during the course of you working for us, and which may raise concerns under various anti-bribery and anti-corruption laws. This list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for us, you must report them promptly to your manager OR to the compliance manager OR using the procedure set out in the Whistle Blowing Policy:

- you become aware that a third party engages in, or has been accused of engaging in, improper business practices
- you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a 'special relationship' with foreign government officials
- a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us

- a third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made
- a third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business
- a third part requests an unexpected additional fee or commission to 'facilitate' a service
- a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services
- a third party requests that a payment is made to 'overlook' potential legal violations
- a third party requests that you provide employment or some other advantage to a friend or relative
- you receive an invoice from a third party that appears to be non-standard or customised
- a third party insists on the use of side letters or refuses to put terms agreed in writing
- you notice that we have been invoiced for a commission or fee payment that appears large, given the service stated to have been provided
- a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us
- you are offered an unusually generous gift or offered lavish hospitality by a third party

Signed.....

Print Name..... SEAN MERRETT

Position in Company..... MANAGING DIRECTOR

Date Approved 09.02.26

Review Date 09.02.28

Anti-Slavery and Human Trafficking Policy

General Statement of Policy

1. Policy statement

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. NatWaste Limited have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.2 NatWaste Limited are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Responsibility for the policy

2.1 The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 The Operations Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the operations manager.

3. Compliance with the policy

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager as soon as possible. [You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.]
- 3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.
- 3.7 NatWaste Limited aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the operations manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the Company Handbook.

4. Communication and awareness of this policy

- 4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 4.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. BREACHES OF THIS POLICY

5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



Signed.....

Print Name..... SEAN MERRETT

Position in Company..... MANAGING DIRECTOR

Date Approved..... 09.02.26

Revised Date..... 09.02.28

EQUAL OPPORTUNITIES POLICY

General Statement of Policy

It is the policy of NatWaste not to discriminate against our workers on the basis of their gender, sexual orientation, marital or civil partner status, gender reassignment, race, religion or belief, colour, nationality, ethnic or national origin, disability or age, pregnancy or trade union membership or the fact that they are a part-time worker or a fixed-term employee. Our workers and applicants for employment shall not be disadvantaged by any policies or conditions of service which cannot be justified as necessary for operational purposes. We shall, at all times, strive to work within legislative requirements as well as promoting best practice.

Our long-term aim is that the composition of our workforce should reflect that of the community and that all workers should be offered equal opportunities to achieve their full potential. This policy, and the measures we take to implement it, have been devised on the basis of advice from the relevant government and professional bodies. We are committed to a programme of action to make this policy effective and to bring it to the attention of all workers. The principle of non-discrimination and equality of opportunity applies equally to the treatment of visitors, clients, customers and suppliers by members of our workforce and also, in some circumstances, ex-employees.

The following paragraphs deal with the specific categories of workers and areas of work which we have identified as potentially giving rise to equal opportunities issues and provides more specific more specific guidance on the parameters of our policy and approach to equal opportunities.

To whom does this policy apply?

This policy applies to our employees, whether permanent, temporary, casual, part-time or on fixed term contracts, to ex-employees, to job applicants and to individuals such as agency staff and consultants and volunteers who are not our employees, but who work with us.

All workers have a duty to act in accordance with this policy, and therefore to treat colleagues with dignity at all times, and not to discriminate against or harass other members of staff, whether junior or senior to them. In some situations, we may be at risk of being held responsible for the acts of individual members of staff and will not therefore tolerate any discriminatory practices or behaviour.

The policy statement in paragraph 1.2 applies equally to the treatment of our visitors, clients, customers and suppliers by our workers.

Personnel responsible for implementation of policy

The Managing Director Responsible for Health and Safety Sean Merrett has overall responsibility for the effective operation of our Equal Opportunities Policy (EOP) and for ensuring compliance with the relevant statutory framework prohibiting discrimination.

Those working at a management level have a specific responsibility to set an appropriate standard of behaviour, to lead by example and to ensure that those they manage adhere to the policy and promote the aims and objectives of the company with regard to equal opportunities.

All members of staff are responsible for the success of this policy and must ensure that they familiarise themselves with the policy and act in accordance with its aims and objectives.

Scope and purpose of policy

We will not unlawfully discriminate on grounds of gender, sexual orientation, marital or civil partner status, gender reassignment, race, religion or belief, colour, nationality, ethnic or national origin, disability or age, pregnancy, trade union membership, or part-time or fixed-term status.

This policy applies to the advertising of jobs and recruitment and selection, to training and development, opportunities for promotion, to conditions of service, benefits and facilities and pay; to health and safety and to conduct at work, to grievance and disciplinary procedures and to termination of employment, including redundancy.

We will take appropriate steps to accommodate the requirements of workers' religions, cultures, and domestic responsibilities.

Forms of discrimination

Discrimination may be direct or indirect and it may occur intentionally or unintentionally. Direct discrimination occurs where someone is put at a disadvantage for a reason related to one or more of the grounds set out above.

For example, rejecting an applicant of one race because it is considered they would not "fit in" on the grounds of their race could be direct discrimination. Indirect discrimination occurs where an individual is subject to an unjustified provision, criterion or practice which puts them at a particular disadvantage because of, for example, their sex or race.

Recruitment and selection

We aim to ensure that no job applicant receives less favourable treatment on any of the unlawful grounds listed in paragraph 3.1. Recruitment procedures will be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities and that sufficiently diverse sectors of the community are reached. Job selection criteria are regularly reviewed to ensure that they are justifiable on non-discriminatory grounds as being essential for the effective performance of the job.

We shall take steps to ensure that knowledge of vacancies reaches a wide labour market and, where relevant, groups under-represented in our business. Where appropriate, use may be made of lawful exemptions to recruit suitably-qualified people to cater for the special needs of particular groups. Vacancy advertisements shall include an appropriate short statement on our equal opportunities policy and a copy of this policy shall be sent to those who enquire about vacancies.

Staff training and promotion and conditions of service

Staff training needs will be identified through regular staff appraisals. All workers will be given appropriate access to training to enable them to progress within the organisation. All promotion decisions will be made on the basis of merit.

The composition and movement of workers at different levels will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unnecessary or unjustifiable barriers and to provide appropriate facilities and conditions of service to meet the special needs of disadvantaged or under-represented groups.

Our conditions of service, benefits and facilities will be reviewed regularly to ensure that they are available to all workers who should have access to them and that there are no unlawful obstacles to accessing them.

Termination of employment

We will monitor redundancy criteria and procedures to ensure that they are fair and objective and do not directly or indirectly discriminate against employees.

We will also ensure that disciplinary procedures are carried out fairly and uniformly for all workers, whether they result in the giving of disciplinary warnings, dismissal or other disciplinary action.

Disability discrimination

If you are disabled, or become disabled in the course of your employment with us, you are encouraged to tell us about your condition. This is to enable us to support you as much as possible. You may also wish to advise us of any reasonable adjustments to your working conditions or the duties of your job which you consider to be necessary, or which would assist you in the performance of your duties. We may wish to consult with you and with your medical adviser(s) about possible reasonable adjustments. Careful consideration will be given to any such proposals and they will be accommodated where possible and proportionate to the needs of your job. Nevertheless, there may be circumstances where it will not be reasonable for us to accommodate the suggested adjustments and we will ensure that we provide you with information as to the basis of our decision not to make any adjustments.

Breaches of policy

If you believe that you may have been disadvantaged on any of the unlawful grounds listed above, you are encouraged to raise the matter through our grievance procedure. Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Workers who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations of a breach of this policy which are found to have been made in bad faith will, however, be dealt with under our disciplinary procedure.

If, after investigation, you are proven to have harassed any other worker on the grounds of sex, marital status, sexual orientation, religion or belief, race, disability or age or otherwise act in breach of this policy, you will be subject to disciplinary action. In serious cases, such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. We will always take a strict approach to serious breaches of this policy.

As this policy applies equally to our workers' relations with visitors, clients, customers and suppliers, if after investigation, you are proven to have discriminated against or harassed a client or supplier you will also be subject to disciplinary action.

Policy review & communication

This policy will be reviewed on an annual basis as a minimum or in the event of changes to legislation. All employees and new starters will be made aware of the policy.



Signed.....

Print Name..... SEAN MERRETT.....

Position in Company..... MANAGING DIRECTOR.....

Dave Approved..... 09.02.26.....

Review Date..... 09.02.28.....