



## **Anti Bribery & Anti Corruption Policy**

GSH Waste Recycling are committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on the company's behalf is responsible for maintaining the company's reputation and for conducting business honestly and professionally.

The company considers that bribery and corruption has a detrimental impact in business by undermining good governance and distorting free markets. The company benefits from carrying out business in a transparent and ethical way. The company does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees or companies acting for it or on its behalf. The management are committed to implementing and enforcing effective systems to prevent and eliminate bribery, in accordance with the Bribery Act 2010.

GSH Waste Recycling have issued an anti-bribery and corruption policy, together with policies on gifts and corporate hospitality ("Policies"), outlining the company's position on preventing and prohibiting bribery and corruption. These Policies apply to all employees and they are required to familiarise themselves and comply with these policies.

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly. Employees and others acting for or on behalf of the company are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments. As part of its anti-bribery measures, the company accepts transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure, whether given or received.

A breach of these policies by an employee will be treated as grounds for disciplinary action. Employees and other individuals acting for the company should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the company. The company has a policy of not conducting business with service providers, agents or representatives that do not support appropriate anti-bribery and corruption objectives.

The success of the company's anti-bribery and corruption measures depends on all employees, and those acting for the company, playing their part in helping prevent bribery. Therefore, all employees and others acting for, or on behalf of, the company are encouraged to report any suspected bribery in accordance with the procedures set out in the policies or in the case of third parties to the company secretary. GSH Waste Recycling will support any individuals who make such a report in good faith.

Signed 

Date 08.01.2025

Stephen Grundy  
Managing Director  
GSH Waste Recycling Ltd



## Anti Slavery and Human Trafficking Policy

GSH Waste Recycling have a zero-tolerance approach to slavery and human trafficking. We are committed to ensuring that there is no modern slavery or human trafficking in their supply chains or in any part of our business.

GSH Waste Recycling's company anti-slavery policy reflects our promise to act ethically and with integrity in all our business relationships. We implement and enforce effective systems and controls to ensure slavery and human trafficking are not occurring anywhere in our supply chains. Our supply chains and supplier adherence to our values with all suppliers have been established over some years and are built upon mutually beneficial factors. We have close and personal links and contact with the owners or directors where possible, reflecting the fact that we partner with all business size operations in the main.

When we appoint new contractors or suppliers, we pre-qualify them through a due diligence process. We look at company performance and get a minimum of two references from other customers to establish that they are suitable. To date, we haven't been made aware of any human trafficking or slavery activities within the supply chain. However, if any were highlighted to us, we would act immediately in accordance with our legal and moral obligations.

### Due diligence process

GSH Waste Recycling and sister company Grundy and Co Excavations have systems in place to:

- Identify and assess potential risk areas when considering new suppliers.
- Regularly review their existing supply chains.
- Mitigate the risk of slavery and human trafficking occurring in their supply chains.
- Monitor potential risk areas in their supply chains.
- Protect whistle-blowers

Signed

A handwritten signature in black ink, appearing to read 'S Grundy', written over a light grey circular stamp.

Date 08.01.2025

Stephen Grundy  
Managing Director  
GSH Waste Recycling Ltd

### **No Smoking Policy**

We as a company consider ourselves responsible employers and we take our obligations to our employees very seriously. This is why we have set out this policy to help us ensure the health, safety and welfare of our employees and to help us comply with our legal duties. Smoking cause's serious damage to the health of smokers, but research has shown that second hand smoke causes cancers, heart and respiratory diseases in non-smokers as well.

- Section 2(2) (e) of the Health and Safety at Work Act 1974 places a duty on employers to provide a safe and healthy working environment.
- Section 2(2) of the Health Act 2006 prohibits smoking in all public premises including workplaces and vehicles.

### **Aims of the Policy**

- Provide a safe and healthy working environment for all staff, customers and visitors;
- Comply with all of the requirements imposed by law;
- Raise awareness of the dangers associated with tobacco smoke;
- Guarantee the right of non-smokers to breathe air free of smoke; and support staff who wishes to give up smoking.

### **Restrictions on Smoking**

- Smoking is not permitted in any of the Company's premises, entrances, or grounds at any time by any person irrespective of their status in, or business with, the Company.
- All visitors, customers, contractors and deliverers are required to abide by the no smoking policy. Staff must inform all of the above of the policy although it must be stressed that staff should not put themselves at any risk in furtherance of this policy.
- Smoking is not permitted in any company vehicles or in any vehicles being used or hired for Company business.
- No smoking signs must be displayed by the Company in all of its premises and vehicles.
- Smoking on Company premises or in Company vehicles constitutes an offence under the Health Act. In the unlikely event that a member of staff does not comply with the Company's No Smoking Policy disciplinary action will be taken in accordance with the Company's disciplinary policy.

### **Support for Smokers**

- Reasonable requests from staff for time to attend smoking cessation groups will be treated sympathetically.
- The company is responsible for maintaining the policy and will provide staff, who wishes to give up smoking with details of where to seek help.
- All requests for help will be treated in the strictest confidence. Written information will be stored in accordance with the Data Protection Act 1998.
- Nothing in this policy should be taken as excusing an employee if their conduct falls within the scope of the Company disciplinary procedures.

Signed 

08.01.2025

Stephen Grundy  
Managing Director  
GSH Waste Recycling Ltd



## **Alcohol and Drugs Policy**

It is the aim of GSH Waste Recycling Limited is to ensure that all employees and sub-contractors are made aware of the contents of this policy, along with the relevant sections of the Transport and Works Act 1992, and the implications therein.

In so far as is reasonably practicable, procedures are in place to prevent any offence under the Act.

The following shall constitute instances of drug or substance misuse:

- The use of prohibited drugs as defined in the Misuse of Drugs Act 1971
- The abuse of prescribed drugs, proprietary medicines or other substances
- The use of medication, prescribed by a doctor or advised by a pharmacist which would affect work.
- The consumption of alcohol
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It is a requirement that no employee or sub-contractor shall:

- Report or endeavour to report for duty having just consumed alcohol, or under the influence of drugs
- Report for duty in an unfit state due to use of alcohol or drugs
- Be in possession of drugs of abuse in the workplace
- Consume alcohol or drugs whilst on duty

Any departure from these rules will not be tolerated, and the appropriate action will be taken in the event of any infringement. Action may also be taken if help is refused and/or impaired performance continues, or in cases of gross misconduct.

Any disclosure shall be treated in the strictest confidence, subject to the provisions of current legislation. It is accepted that relapses may occur, and any absence for treatment and rehabilitation shall be recorded as normal sickness.

The operations of the company and this policy will be reviewed at regular intervals or in light of changing company circumstances, and procedures. These changes will be brought to the attention of employees and others whose circumstance may be affected by such changes.

Signed

A handwritten signature in black ink, appearing to read 'S Grundy'.

08.01.2025

Stephen Grundy  
Managing Director  
GSH Waste Recycling Ltd

## **Equal Opportunities Statement**

GSH Waste Recycling Ltd is an equal opportunities employer. This means that it is the Company's policy that there should be no discrimination against or harassment of any employee or job applicant either directly or indirectly on the grounds of:

- . Race, colour, nationality or national or ethnic origin ("race");
- . Sex, or marital status;
- . Sex change status or Sexual orientation;
- . Disability (e.g., a long term mental or physical impairment);
- . Political belief, Religion or philosophical belief;
- . Trade union activity or Age.

### The Company's policy is to:

- . Eliminate, as far as is reasonably possible, discrimination and harassment from the workplace;
- . Encourage all its employees to take an active role against all forms of discrimination and harassment;
- . Deter employees from participating in discriminatory behaviour or harassment;
- . Demonstrate to all employees that they can rely upon the Company's support in cases of discrimination or harassment at work.

The Company is fully committed to providing a good and harmonious working environment that offers equal treatment and equal opportunities for all employees and where every employee is treated with respect and dignity. The Company's aim is that remuneration, recruitment, promotion and retention should not be affected by irrelevant considerations and stereotyping.

The Company recognises that the provision of equal opportunities in the workplace is not only good management practice; it also makes sound business sense. The Company's equal opportunities policy will help all employees develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation. Whilst the Company recognises that the overall responsibility for the effective operation of this policy lies with the Board of Directors, all employees, whatever their position within the Company, have some measure of responsibility for ensuring its effective implementation in their day to day activities and working relationships with colleagues.

### Employees should ensure to:

- . They co-operate with any measures introduced to develop equal opportunities;
- . They respect the sensitivities of others;
- . They do not instruct, or attempt to induce or pressurise other employees to act in breach of the policy;
- . They refrain from taking discriminatory actions or decisions which are contrary to either the letter or spirit of this policy and, for employees of managerial status, that they ensure that those who report to them also comply with the policy;

breaches of the Company's equal opportunities policy and procedures and any unfair or unlawful discrimination will not be tolerated and will be dealt with under the Group's disciplinary procedures. In serious cases, this could lead to dismissal of the relevant individual. The policy shall also apply to employees of contractors working at the Company's premises.

Signed 

08.01.2025

Stephen Grundy  
Managing Director  
GSH Waste Recycling Ltd