

Contractor Code of conduct

Full Circle is committed to high standards of environmental & social responsibility and ethical conduct. Therefore, wherever a supplier provides goods or services to Full Circle the supplier is required to comply with all applicable laws & regulations together with the Full Circle Supplier/Contractor Code of Conduct (the "Code"). This Code outlines Full Circles expectations for supplier conduct regarding Labour and Human Rights, the Environment, Ethics, Health & Safety, and Privacy.

Labour and Human Rights

The supplier/contractor shall uphold high standards of labour and human rights in compliance with the UK Modern Slavery Act 2015, the Equality Act 2010, and relevant international conventions including the Universal Declaration of Human Rights, the International Labour Organization (ILO) Conventions on Forced Labour (No. 29 & No. 105) and Child Labour (No. 138 & No. 182) and any other applicable laws. In particular, the supplier will:

- Respect the personal dignity, privacy and rights of each individual;
- Prohibit behaviour including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative;
- Refrain from employment discrimination based on sex, age, ethnicity, nationality, religion, disability, political affiliation or sexual orientation;
- Not tolerate or use child labour in any stage of its activities other than in accordance with all applicable laws and regulations;
- Not use any forced labour, including but not limited to involuntary prison labour, victims of slavery and human trafficking and allow all employees the choice to leave their employment freely upon reasonable notice;
- Ensure that all employees receive at least the legal minimum wage and provide employees with time off for holiday, leave periods and legally recognised holidays; and
- Ensure that working hours, including overtime, do not exceed applicable legal requirements.

Environment

The supplier shall develop, implement and maintain environmentally responsible business practices in accordance with the UK Environmental Protection Act 1990 as well as relevant international standards and any other applicable laws. In particular, the supplier will:

- Implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle (non-)hazardous substances or waste;
- Implement a systematic approach to identify, control, and reduce wastewater produced by its operations;
- Implement a systematic approach to prevent contamination of storm water runoff;
- Identify, manage, reduce, and responsibly control air emissions emanating from its operations that pose a hazard to the environment;
- Identify, control, monitor, and reduce noise generated by the facility that affects boundary noise levels;
- Obtain, keep current, and comply with all required environmental permits; and
- Reduce energy, water, and natural resource consumption by implementing conservation and substitution measures.

Ethics

The supplier shall conduct its business in an ethical manner in compliance with the UK Bribery Act 2010, relevant international standards and other applicable laws. In particular, the supplier will:

- Refrain from any and all forms of corruption, extortion and bribery, and specifically ensure that payments, gifts or other commitments to customers (including Full Circle employees), government officials and any other party are in compliance with applicable anti-bribery laws;
- Adhere to anti-trust and other competition laws;
- Disclose to Full Circle information regarding potential conflicts of interest relating to its activities as an Full Circle supplier, including disclosure of any financial interest an Full Circle employee may hold in its business;
- Protect all confidential information provided by Full Circle and its respective business partners;
- Respect intellectual property of others, including Full Circle; and
- Adhere to international trade laws and regulations and export control laws and regulations.

Health & Safety

The supplier shall provide and maintain a safe work environment in compliance with the UK Health and Safety at Work Act 1974, the Public Health Acts 1875 to 1961, the relevant ILO convention such as Convention No. 144 on Occupational Health and Safety and other applicable laws. In particular, the supplier will:

- Identify, evaluate, and manage occupational health and safety hazards;
- Provide employees with job-related personal protective equipment and instruction on its proper use;
- Identify, evaluate, and control employee exposure to tasks that pose ergonomic risk such as excessive force, improper lifting positions, or repetitiveness;
- Provide employees with clean and safe drinking water, clean toilet facilities and ensure that the working environment is generally kept in a healthy and safe condition; and
- Provide employees with appropriate workplace health and safety training in their primary language. Health and safety related information shall be clearly posted in the facility.

Privacy

The supplier shall process and protect personal data in compliance with the UK General Data Protection Regulation (UK GDPR) and other applicable laws. In particular, the supplier will:

- Ensure that all personal data is processed lawfully, fairly, and transparently;
- Only collect and process personal data for specified, explicit, and legitimate purposes and not further process it in a manner incompatible with those purposes;
- Implement appropriate technical and organisational measures to ensure the security of personal data, including protection against unauthorised or unlawful processing, accidental loss, destruction, or damage;
- Ensure all employees handling personal data receive appropriate training on data protection responsibilities;

- Obtain valid consent where required for the processing of personal data and ensure that individuals have clear and accessible rights to withdraw consent at any time;
- Comply with data subject rights, including the right of access, rectification, erasure, restriction of processing, data portability, and the right to object;
- Ensure that any international transfer of personal data outside the jurisdiction is carried out in compliance with the law, using appropriate safeguards;
- Notify full circle without undue delay of any personal data breach that is likely to result in a risk to the rights and freedoms of data subjects; and
- Ensure that third parties processing personal data on its behalf adhere to the same data protection standards.

Evaluation and Auditing

In order to ensure and demonstrate compliance with the Code, the supplier shall keep a record of all relevant documentation and provide Full Circle with supporting documentation upon request. To verify supplier compliance, Full Circle reserves the right to evaluate and audit the supplier's operations and facilities, at Full Circle's own cost and upon reasonable notice, with or without the support of a third party. If the results of such an evaluation or audit cause Full Circle to be of the opinion that the supplier does not comply with the Code, the supplier shall take necessary corrective action in a timely manner, as directed by Full Circle. If the supplier fails to comply with the Code, then Full Circle may take action against the supplier, including suspending or terminating the supplier's activities as one of Full Circle's suppliers. Suppliers are encouraged to make their employees aware of this Code.