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1. Policy Statement

The McGrath Group recognises the importance of core values. They identify who we are and define how we work.

The company's core value principles have been established upon the premise that *waste is a valuable precious resource*.

Our key core priority is to optimise the full recycling process for all the material we manage for our clients and our core value statement is constructed firmly on this foundation. It represents, informs and influences everything that the company does.

2. Responsibilities

The Board of Directors are ultimately responsible for ensuring this policy is fully implemented and providing the arrangements to ensure our commitments regarding core values are fully met.

All employees are responsible for carrying out the principles within this policy and conduct all business in line with our core values.

3. In Practice

Employees

- We strive to have the very best people in our company. We support ongoing training and development for all of our team and strive to provide a positive workplace.

Clients

- We form strong long standing business partnerships based on sustainability, we are committed to delivering value across our operations.
- We act with transparency and integrity, and operate with a strong sense of responsibility.
- We are committed to providing a business that makes the most of the commercial opportunities available to us and our clients. We believe that innovation is key to our ongoing development.
- We are committed to understanding and exceeding our clients' needs and expectations.
- We build relationships based on integrity, responsiveness and excellent communications.

Suppliers

- We partner with a number of organisations that facilitate the re-use of a range of materials, we work with our suppliers and partners in a constructive and ethical way.

The company is committed to zero tolerance towards the criminal facilitation of tax evasion. It is our policy to operate our business dealings in an honest and ethical manner within the current legislation and to the highest standards of professional conduct.

The legislation covering this area is the Criminal Finances Act 2017.

In order to operate effectively within these values, it is essential that it has procedures in place to prevent employees from criminally facilitating tax evasion.

The Company's definition of tax evasion is below:

Tax Evasion - is an illegal practice where a person, organisation or corporation intentionally avoids paying the true tax liability.

A UK Tax Evasion offence means:

- the common law offence of cheating the public revenue (which, broadly speaking, includes any form of fraudulent conduct which results in depriving the Exchequer of the money to which it is entitled), and
- an offence in any part of the United Kingdom consisting of being knowingly involved in, or taking steps with a view to, the fraudulent evasion of tax.

For an offence to constitute a foreign Tax Evasion offence it must be:

- a criminal offence under the law of the foreign territory relating to tax imposed under the law of that country, and
- conduct which would be regarded by the UK Courts as an offence of being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax (if it had occurred in the UK).

The company is committed to trading within the law and remaining the highest possible ethical standards in all its business activities.

The company is opposed to all forms of criminal tax evasion; we have set out this policy which is implemented in conjunction with our comprehensive range of standard operating policies/procedures.

The Board of Directors of the company has overall responsibility for ensuring that this policy complies within the legal obligations and that all team members and associates comply with it.

All employees, consultants, contractors and agency workers and any individual working directly for the business (including agents) are required and agree to operate within the following guidelines:

- To always act with honesty and integrity and support the company's policy relating to Tax Evasion.
- To comply with all policies and procedures set out by the company.
- To report any breaches of the policy, if you suspect Tax Evasion is occurring or has occurred previously or if you are unclear on procedures or your responsibilities.
- Communication of this policy will be at all levels within our company. All managers will ensure that their teams are aware of this policy and their responsibilities to comply with it
- Promptly reporting to the company any violations of law or ethical principles or company policies and cooperate fully in any audit, inquiry, review or investigation by the company.
- Avoid any activities that could involve or lead to involvement in the criminal facilitation of tax evasion.

Environment

- As a company, we embrace the shift that has occurred since our formation in the early 1970's, at which time managing waste was very much seen in terms of disposal. We aim to be at the forefront of 'the circular economy' and we do this in a number of ways:
- We remain at the forefront of the recycling movement, and have done for over 49 years. We ensure that we remain at the cutting edge of recycling technology. Over the course of four decades we have assiduously built our reputation for innovation. We embrace technological advances where they increase efficiency and improve our services.
- We apply the concept of the Hierarchy of Waste as a template to maximise the environmental performance of clients' wastes.
- We have a zero-waste to landfill policy, and are continually seeking to re-evaluate our processes for managing each material stream in an attempt to push the methodology higher up the hierarchy.
- We are committed to improving our environmental performance.

Health & Safety

We strive to protect the health, safety and environment of our employees.

We maintain health, safety and environmental systems to access and where appropriate improve the working conditions.

CORE VALUE POLICY



Our Core Values are deeply ingrained as the fabric that drives employee behaviour, company decisions and actions. In order to support our Core Value Statement, the company has a number of key policies which are available upon request.

This policy should be read in conjunction with our other operating policy documents.

Our processes and procedures for implementing our business values and our responsibilities are contained in specific, separate and more detailed documents which are implemented via our Integrated Quality, Environmental.

We also operate an integrated management system which is certified against international standards ISO 45001:2018 (Health & Safety Management), ISO 9001:2015 (Quality), ISO 14001:2015 (Environmental) and ISO 50001:2011 (Energy) ensures our products and services are supplied safely, consistently and sustainably.

Internal assessments of our operations will be performed to determine if this policy or any others including procedures and processes fulfil their objective.

Signed:

A handwritten signature in black ink, appearing to be "DM", written over a circular scribble.

David McGrath, Managing Director