

Redeem Management System

Document Title: Corporate Social Responsibility Policy

Responsibility: Q/E Manager

Approval: Director of Marketing



SCOPE

This policy applies to all aspects of Redeem's business. The objective of this policy is to inform and set out the standards that we expect our employees, suppliers and purchase clients to achieve, and which we expect them to promote.

RESPONSIBILITY

The Q/E Manager is responsible for keeping this policy up-to-date. This policy is supported by the Board of Redeem Ltd and shall be reviewed from time to time.

DOCUMENT HISTORY

Issue	Date	Details of amendment / change	Responsibility
1	17.07.2009	Review and reissue of policy.	Ecodyn Ltd
2	03.08.2009	Review and reissue of policy.	Ecodyn Ltd
3	28.06.2011	Review and reissue of policy following June ISO Management Review	Ecodyn Ltd
4	25.08.2011	Policy reviewed, reissued and rename as a result of customer audit.	Ecodyn Ltd
5	15.09.2011	Policy rewritten and reissued.	Ecodyn Ltd

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Corporate Social Responsibility Policy

1 Introduction

Redeem is an innovative global leader providing responsible solutions in the recovery, reuse and resale of empty printer cartridges, mobile phones and consumer electronic devices on an international scale with a focus on excellence, service and value.

Redeem provides services to a broad spectrum of commercial organisations, charities, NGOs and other groups. Through our core business channels of collection, buying and sales, we provide substantial revenue streams to our charities, schools, community groups and other partners whilst supplying quality products to customers worldwide.

Redeem's global operations help to reduce the amount of raw materials and energy required to manufacture these items as well as diverting waste from landfill. Mobile phones are reused and in some cases provide communication in developing countries, where landline networks are not readily available. Refilled cartridges re-appear on the market as a recycled and cost effective alternative to new cartridges worldwide. The other electronic devices we recover, such as laptops, game consoles and MP3 players are reused, in many cases providing consumers with a cost effective alternative to buying a new product.

1.1 Our Vision

Our vision is to be a world leader in the recovery of mobile phones, electronic devices, printer cartridges, business ethics and innovation. We believe that all organisations have a responsibility to contribute positively to society and the environment and it this belief that is the key driver of our business philosophy.

1.2 Corporate Social Responsibility

Redeem takes great pride in its corporate responsibility operations and aims to encourage high standards within its operations and across its supply chain. We act honestly and with integrity to ensure that our customers have the confidence in the Redeem brand.

Our Corporate Social Responsibility Policy has been developed to ensure that our business is conducted in adherence with high ethical and legal principles and sets standards of professionalism and integrity for all employees and operations worldwide. The objective of this policy is to inform and set out the standards that we expect our employees, suppliers and purchase clients to achieve and which we expect them to promote.

2 Our Standards

2.1 Quality

Redeem operates an Integrated Management System certified to ISO 9001 and ISO 14001 to ensure that our products and service provided consistently meet customer requirements whilst striving to operate in an environmentally and socially sustainable manner. We have provided adequate controls to assess and address risks to Redeem's business, our employees, our environment and our reputation.

Redeem offer high-quality reliable products and services. We are constantly striving to exceed customer expectations and to improve customer satisfaction and monitor our performance through a variety of channels. In order to achieve this, we have developed a system which includes procedures for assessing aspects and impacts of our operations and identifying quality processes for controlling these and for monitoring performance against objectives and targets set for each process. The system also includes procedures for monitoring, auditing and reviewing the company's performance and for communicating information internally and externally.

2.2 Environment

At Redeem, we recognise that our day-to-day activities have an inherent element of risk to the environment. The nature of Redeem's business requires the company to consider the environmental implications of its operations

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regularly. Our business helps divert waste from landfill and provides refurbished handsets to developing countries where the reliance on telecommunications is very high, but the landline infrastructure is poor and the cost of new handsets often prohibitive.

We are committed to preventing and minimising our negative environmental impacts where practicable whilst striving to increase our positive environmental impacts. Redeem has developed an Integrated Management System with an environmental component which meets the requirements of ISO 14001.

The environmental management system on site ensures that all of our significant impacts on the environment are considered and addressed appropriately. Key objectives and targets have been developed regarding reducing energy and water consumption and the company is striving towards a zero waste to landfill policy on site. Our system is based on the concept of continual improvement and various programmes are implemented on site to achieve this.

We are committed to meeting and exceed the requirements for compliance with relevant legislation, codes of practice and other guidance to which we subscribe. In addition, Redeem fully endorses the Mobile Phone Partnership Initiative (MPPI) which was launched in December 2002 under the Basel Convention and is supported by the Basel Convention Parties and Signatories.

2.3 Health and Safety

Redeem takes the wellbeing of our staff and visitors very seriously. To ensure a safe and healthy working environment, we operate a Health and Safety Management System developed in accordance with the requirements of the OHSAS 18001 standard and based on a process of continual improvement. We adhere to all relevant local, national and international health and safety legislation.

Redeem have established procedures for identifying and recording health and safety risks from our activities, products and services in order to ensure our activities do not put our employees or others at risk and to improve our health and safety performance. Health and safety risks are also considered when introducing new or modified processes and products

Redeem provides a safe and comfortable working environment that is well ventilated and free from noxious and harmful fumes. We provide suitable ambient and local lighting, sufficient room space, suitable workstations and appropriate seating arrangements. We also ensure safe pedestrian routes in our warehouses and work to eliminate obstructions, and slipping and tripping hazards. Employees are provided with adequate welfare facilities and housekeeping services are contracted as necessary. Equipment within the workplace is maintained as required and measures are employed to protect operators from any dangerous equipment.

Relevant health and safety training is provided to employees according to their job descriptions and appropriate personal protective equipment (PPE) is provided where required. This ensures that our staff can work safely and efficiently whilst taking precautions to preventing accidents and incidents within the workplace.

Redeem requires its employees to comply with the company's health and safety policies and procedures and to cooperate in maintaining safe and healthy working conditions. All employees are expected to report any real and potential work related accidents and incidents to their line managers and/or designated first aiders.

2.4 Ethical Policies

Redeem has a robust Equal Opportunities Policy which covers all aspects of discrimination and dignity within our workplace and expects suppliers and purchase clients to demonstrate similar policies. Redeem is committed to meeting the standards listed in the Ethical Trading Initiative (ETI) Base Code and at a minimum expects its suppliers and purchase clients to meet the same standards. We respect the key components of the UN Universal Declaration of Human Rights as well as the declarations of the International Labour Organisation.

2.4.1 Employment, Discrimination and Harassment

Accounting for local practice and the operational requirements of the business, it is Redeem's goal to offer unambiguous and fair terms of employment and to provide employees with appropriate opportunities to develop

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their skills and progress in their careers. Redeem intends to honour all applicable terms and conditions of employment.

The Company recognises its duty and the benefit of providing working conditions which promote good health, safety and environmental practices. Employees are encouraged to report immediately any health, safety or environmental concerns to their line manager in order to protect the welfare of themselves, their colleagues and the environment. Employees are encouraged to recognise their duty to act in a responsible manner in the workplace, having due regard for the health, safety and general welfare of their colleagues.

We consider that the diverse backgrounds and nationalities of Redeem employees around the world form a key strength to the business. All employees regardless of their colour, race, religion, national origin, caste, marital status, sexual orientation, gender, union membership, political affiliation, disability or age should be treated fairly and honestly with both respect and dignity.

Harassment (including sexual, physical, mental, use of abusive language or offensive gestures) or bullying, in any shape or form will not be tolerated. Any employee who is proved to have acted in a discriminatory manner or to have indulged in bullying or harassment will be subject to disciplinary or grievance procedures and all employees are strongly encouraged to report such incidents.

It is our policy to respect the human rights of all employees including:

- Employment is freely chosen
- Ensuring employees have the freedom to associate or to collectively bargain without fear of discrimination against the exercise of such freedom
- Child labour is not used and all young workers must satisfy local government's legislation for employment, including meeting the minimum age requirements adopted by ratification of ILO Convention 138
- Living wages will be paid and no staff will be paid less than the national minimum rate for that country
- Working hours are not excessive and no member of staff will work in excess of that country's working hours' legislation or requirements adopted by ratification of ILO Convention 1
- Regular employment is provided

2.4.2 Employee Benefits

Employees are entitled to various benefits which are provided in more detail as part of their induction packs. These benefits include:

- competitive holiday entitlement
- membership in the company pension scheme
- bereavement leave
- maternity, paternity and adoption leave
- opportunities for professional development
- staff discounts

2.4.3 Anti-Bribery and Corruption

The UK anti-bribery and corruption legislation applies to all activities of a UK-based business no matter where they are carried out in the world. This therefore applies to all of Redeem's activities worldwide, whatever the local law, practice or custom may be.

Redeem aims to ensure that the Company and its employees will not at any time knowingly breach any relevant anti-bribery and corruption legislation and provides guidelines to employees to prevent such activity. All employees have an independent obligation to prevent bribery and corruption in the Company and to ensure that any interaction with public officials complies with relevant laws. Employees are encouraged to seek guidance from the Human Resources Department if they are at any time uncertain as to whether their actions will comply with the regulations.

Employees are to behave honestly, be trustworthy and set a good example and are not allowed to offer or accept bribes. They are not to offer or accept any gifts or hospitality to or from clients, contractors, suppliers, other third

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parties or public officials, without express prior written approval from the Chief Executive Officer. If employees are faced with a demand for a facilitation payment, they must resist the payment and inform the CEO. Where relevant, employees must make a clear distinction between the interests of the Company and private interests to avoid any conflict of interest and if such conflict does arise, they should report it to the CEO immediately.

2.5 Our Community

Redeem has a number of charity partners with which we are aligned. Many of our donators send used printer cartridges and electronic devices in support of a campaign which will receive money from the recycling process. Similar campaigns are run with schools, Boy Scout groups and Girl Guide troops.

In addition, Redeem have a number of social inclusion initiatives, working with major charitable and public sector organisations to encourage diversity and make entering the workplace easier for largely unrecognised groups of individuals. Our equal opportunities recruitment programmes include:

- Redemption Programme – This programme is run in partnership with the Scottish Prison Service helping offenders and former offenders back into society and encouraging rehabilitation through employment.
- Back to Work Programme – Redeem works closely with Caledonian Clubhouse, an outreach centre for people with mental health issues, offering supported part-time work experience and placements.
- Positive About Disabled – Redeem is a certified Positive About Disabled employer by the Disability Employment Advisor of Jobcentre Plus.

Redeem also encourages its employees to make a difference in the community through various schemes, including:

- Employee Volunteering – Every member of staff is allowed 12 half days paid leave each year to take part in community volunteering projects during company time.
- Blood Donation – Redeem actively encourages staff to support blood donation and offers employees paid time off during working hours to attend donor sessions in the local area.

2.6 Legal Compliance

At all times, it is our policy to stay within the law, rules and regulations of the countries, states or other jurisdictions in which we operate. It is our policy to cooperate fully with relevant public authorities and regulatory bodies as appropriate. We also compete fairly in our markets.

The senior management team of each operating unit or subsidiary is responsible for ensuring that legislation is complied with and that requirements are appropriately communicated with their staff.

2.7 Reporting of Issues

Redeem has established procedures that ensure all non-conformances are investigated and actions are taken to prevent the issue from reoccurring as well as eliminating the cause of the non-conformance. Records of issues raised and subsequent actions taken are kept. All employees are expected to report all non-conformances that they encounter.

All employees have the right and responsibility to resolve doubts or uncertainties about ethical questions or compliance with the law. To resolve any ethical or legal issue, employees are encouraged to contact their immediate line managers or supervisors for guidance prior to taking any action. We also strongly encourage an 'open door' policy to bring any queries, if necessary, to a higher level of management.

All issues will be thoroughly addressed and investigated in a reasonable, proportionate and suitable manner.

2.7.1 Whistle Blowing

Redeem is committed to the highest standards of openness, probity and accountability and subsequently encourages staff and other members of the Company to voice concerns in a responsible and effective manner. All employees have the right and the responsibility to question possible wrongdoings and are encouraged to remain vigilant against

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such possible actions. Where an employee discovers information which they believe shows serious malpractice or wrongdoing then this information should be disclosed internally without fear of reprisal.

If an employee suspects wrongdoing (whether or not the suspected act has actually occurred), he/she should immediately report the matter to their line manager, or if this is not possible, to a higher level of local management. Line/local management should be able to advise if the action in question is in fact a wrongdoing. If the employee feels that he/she cannot report the suspect wrongdoing at a local level, the employee should report it immediately to John Carver, Non Executive Director, and he can be contacted at johnnycarver@hotmail.co.uk or 07841 794409.

The company will treat all disclosures in a confidential and sensitive manner. Whilst we encourage individuals to put their name to any disclosure they make, concerns expressed anonymously will also be considered appropriately.

3 Achieving Our Commitments

Redeem believes that trust fosters long-term relationships which are built through honesty, openness and fair play. All aspects of our business must be based on the highest ethical standards. All employees are expected to contribute to the success of the Company by performing their jobs as required and conducting themselves in a professional manner consistent with the company's business values and standards of business conduct. Our employees are key to our success and we're all part of the Redeem team, so we all must take responsibility for our own actions and conduct. In addition, since managers are responsible for directing the actions of others and for setting an example for other employees, they should be familiar with this policy and how it applies to them and those under their supervision. It should be remembered that no one has authority to require or influence another employee to violate this code of conduct, and any attempt to do so may result in immediate disciplinary action, up to and including termination of employment.

3.1 Supply Chain Responsibility

Goods are both donated and traded through Redeem from across various sectors and are then distributed globally. Our donators, commercial organisations, campaigns, NGOs and charity partners are keen to ensure that phones and cartridges collected through them are treated in an environmentally and socially sound manner. Therefore, suppliers and purchase clients are informed of our corporate responsibility policies, assessed on their performance and issues addressed as they arise.

Redeem is committed to raising awareness of these standards across the supply chain. We will, and expect our suppliers and customers to

- utilise a risk-based approach to implementing ethical, environmental, quality and health and safety standards
- concentrate on areas of the supply chain where the risk of not meeting our standards is highest and where the most difference can be made given our available resources
- ensure that appropriate training and guidelines to implement our standards are provided to relevant people and employees

Redeem will work with our suppliers and customers to help them to achieve and exceed our required standards and to continually improve their ethical, environmental, quality and health and safety systems. We will assess our suppliers through monitoring and/or independent verification.