



AUDIT PACK

Taking the hassle out of pallets

Tel 01642 465 556 / **Web** www.rpsltd.com

Address RPS Pallets, Hudson House, Cleasby Way, Eaglescliffe, TS16 0RD

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1. COMPANY DETAILS



Address:	Hudson House Cleasby Way Durham Lane Industrial Park Eaglescliffe Stockton-on-Tees TS16 0RD
Main Telephone:	(01642) 465556
Accounts Telephone:	(01642) 469400
Bank Account Name:	Returnable Packaging Services Ltd
Bank Name & Address:	HSBC PO Box 117 60 Albert Road Middlesbrough TS1 1RS
Sort Code:	40-33-01
Account Number:	92289547
IBAN Number:	GB14HBUK40330192289547
Swift Code:	HBUKGB4108G
Company Registration:	4540000
VAT Number:	GB 804 5054 58
D-U-N-S Number:	732662361
Managing Director:	Gary Hudson
Business Development Director:	Owen Hines
Commercial Director:	Thomas Hudson
Financial Manager:	Sam Dixon
Business Development Manager:	Josh Laverick
Senior Accounts Manager:	Emma Norton
Customer Service Managers:	Alaister Jackson & Lisa Headlam
Operations Manager:	Ray Windross

2. COMBINED LIABILITY INSURANCE CERTIFICATE



Certificate of Employers' Liability Insurance (a)

(where required by regulation 5 of the Employers Liability (Compulsory Insurance) Regulations 1998 and as amended with effect from 1 October 2008 (display and production copies of certificates of insurance), "(1) An employer who has been issued with a certificate under regulation 4 must display one or more copies of it at each place of business at which he employs any relevant employee of the class or description to which such certificate relates. (2) The requirements in paragraph (1) will be satisfied if the certificate is made available in electronic form and each relevant employee to whom it relates has reasonable access to it in that form."

Policy Certificate No: B024122L12249

Name of Policy/Certificate Holder: Returnable Packaging Services Ltd

Date of commencement of insurance: 3 October 2022

Date of expiry of insurance: 2 October 2023

We hereby certify that subject to paragraph 2:-

1. the insurance to which this certificate relates satisfies the requirements of the relevant law applicable in Great Britain, Northern Ireland, the Isle of Man, the Island of Jersey, the Island of Guernsey and the Island of Alderney, or to offshore installations in any waters outside the United Kingdom to which Employers' Liability (Compulsory Insurance) Act 1969 or any amending primary legislation applies (b): and
2. the minimum amount of cover provided by this policy is no less than £5,000,000 (c)

Signed on behalf of Lloyd's Underwriters subscribing to the above policy (Authorised Insurers)

A handwritten signature in black ink, appearing to be 'A. J. Smith', written over a light blue rectangular background.

Signature

- (a) Where the employer is a company to which regulation 3(2) of the Regulation applies, the 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.

Note: The information below this line does not form part of the statutory certificate. Those Underwriters at Lloyd's on whose behalf this certificate is issued require the following information to be entered by the issuing intermediary:

Name and address of issuing intermediary:

Policy issued on behalf of AXIS Managing Agency Limited by

Citynet Insurance Brokers Ltd.
2nd Floor
88 Leadenhall Street
London, EC3A 3BP
B0241GC108563Y

Under Binding Authority agreement number

3. COMBINED LIABILITY INSURANCE BREAKDOWN



Date: 13 September 2022
Ref: RETUR-1/SF

TO WHOM IT MAY CONCERN

Our Client: Returnable Packaging Services Limited

Business Description: Cleaning/Recycling of Plastic sacks & Wooden Pallets for reuse or disposal to third party waste sacks

We are Insurance Brokers to the above client and confirm that we have arranged Employers Liability and Public & Products Liability on their behalf as follows:

Public/Products Liability

Policy Number:	B024121L12249
Insurer:	AXIS Managing Agency Limited/Lloyds of London
Period of Insurance:	12 months from 03/10/2022
Limit of Indemnity:	£5,000,000 any one occurrence (in the aggregate for Products Liability)
Excess:	£1,500 applicable to claims for Third Party Property Damage and Bodily Injury

Employers' Liability

Policy Number:	B024121L12249
Insurer:	AXIS Managing Agency Limited/Lloyds of London
Period of Insurance:	12 months from 03/10/2022
Limit of Indemnity:	£10,000,000 any one occurrence

The above policies include an Indemnity to Principals Clause and are subject to the insurer's policy terms, conditions, exclusions and warranties.

We trust that this information is sufficient for your requirements and request that it is treated as strictly private and confidential. Please contact us if any further details are required.

Yours faithfully

A handwritten signature in black ink that reads 'SFoster'.

Simon Foster
Commercial Insurance Broker

Email: simon@pbcurran.co.uk

York House Outgang Lane York YO19 5UP
Tel: 01904 436600 enquiries@pbcurran.co.uk www.pbcurran.co.uk

P B Curran Insurance Brokers is a trading name of P B Curran & Co (York) Limited. Registered in England Company No: 4711882
Authorised and Regulated by the Financial Conduct Authority, FCA number 308428. Registered Address - York House Outgang Lane Osballdwike York YO19 5UP

4. ISO 14001:2015 CERTIFICATE



CERTIFICATE OF REGISTRATION

This document certifies that the Management System of

Returnable Packaging Services Limited

Hudson House Cleasby Way Eaglescliffe Stockton-on-Tees Durham TS16 0RD

have been assessed and approved by QMS International Ltd to the following management systems, standards and guidelines:-

ISO 14001:2015

The scope of the Management System applies to the following:-

THE INTERNATIONAL RECOVERY AND RE USE OF TRANSIT PACKAGING ASSETS

Original Approval:	<u>26/08/2011</u>
Current Certificate:	<u>26/08/2021</u>
Certificate Expiry:	<u>25/08/2024</u>
Certificate number:	<u>181472021</u>



This Certificate remains valid while the holder maintains their management system in accordance with the published standard. To check the validity and status of this certificate please email certificates@qmsuk.com


On behalf of QMS International Ltd

This Certificate is the property of QMS International Ltd and must be returned in the event of cancellation

5. ISO 45001:2018 CERTIFICATE



CERTIFICATE OF REGISTRATION

This document certifies that the Management System of

Returnable Packaging Services Limited

Hudson House Cleasby Way Eaglescliffe Stockton-on-Tees Durham TS16 0RD

have been assessed and approved by QMS International Ltd to the
following Management System Requirements and/or Guidelines:-

ISO 45001 : 2018

The scope of the Management System applies to the following:-
THE INTERNATIONAL RECOVERY AND RE USE OF TRANSIT PACKAGING ASSETS.

Original Approval: 14/09/2012
Current Certificate: 14/09/2022
Certificate Expiry: 13/09/2025
Certificate number: 196972012



This Certificate remains valid while the holder maintains their management system in accordance with the published standard. To check the validity and status of this certificate please email certificates@qmsuk.com

A handwritten signature in black ink, appearing to read 'Mary', is written over a horizontal line.

On behalf of QMS International Ltd

This Certificate is the property of QMS International Ltd and must be returned in the event of cancellation

6. WASTE CARRIER LICENCE



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

Regulation authority

Name	 Environment Agency
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	RETURNABLE PACKAGING SERVICES LIMITED
Registered as	An upper tier waste carrier, broker and dealer
Registration number	CBDU154457 R P S LTD HUDSON HOUSE
Address of place of business	CLEASBY WAY EAGLESCLIFFE STOCKTON-ON-TEES TS16 0RD
Telephone number	01642465556
Date of registration	23 January 2023
Expiry date of registration (unless revoked)	8 February 2026

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.

7. WASTE EXEMPTION PERMITS



Location of the Operation:	Hudson House Cleasby Way Durham Lane Industrial Park Eaglescliffe TS16 ORD
National Grid Ref:	NZ 41890 15220
Permitted activities:	S2 – Storing waste in a secure place T1 - Cleaning, washing, spraying or coating relevant waste T12 – Manually treating waste T4 – Preparatory treatments (baling, sorting, shredding etc) T6 – Treating waste wood and waste plant matter by chipping, shredding, cutting or pulverising U4 – Burning of waste as a fuel in a small appliance U9 – Using waste to manufacture finished goods
Exemption Ref No:	WEX365713
Date of Registration:	23.04.2023
Date of Expiry:	22.04.2026

8. VEHICLE OPERATOR'S LICENCE



GOODS VEHICLE OPERATOR'S LICENCE

THIS LICENCE MUST NOT BE ALTERED OR DEFACED IN ANY WAY

Issued to:

**MR OWEN HINES
RETURNABLE PACKAGING SERVICES
LIMITED
HUDSON HOUSE
CLEASBY WAY
DURHAM LANE INDUSTRIAL PARK
EAGLESCLIFFE
STOCKTON-ON-TEES
TS16 0RD**

Issued by:

Office of the Traffic Commissioner
North East of England
Hillcrest House
386 Harehills Lane
Leeds
LS9 6NF
0300 123 9000

Goods Vehicle Restricted

Licence number: OB1148214
NOT TRANSFERABLE

This licence is in force from:

31/10/2016

This licence will continue for as long as you continue to meet its terms. However, it will come to an end if you do not pay the necessary continuation fee by the date required. The licence may also face regulatory action including revocation if you operate outside its terms. You have paid for an initial period of five years, which starts with the date the licence was issued. The continuation fee must be paid before the end of the month before that five year period comes to an end and every five years after that. Please see note 1 for further details.

This document is an operator's licence issued under the Goods Vehicles (Licensing of Operators) Act 1995 (the Act). The undertakings recorded in this licence have been given by the licence holder and are considered to be material to the grant of the licence. In the case of a licence first issued before 1 January 1996, the recorded undertakings include statements of intent made by the operator.

The maximum number of motor vehicles and trailers authorised in accordance with section 6 of the Act is:

Motor vehicles	5
Trailers (inc semi-trailers)	10



A handwritten signature in black ink, appearing to be 'J. B. ...', written over a faint, illegible stamp.

Traffic Commissioner

8. VEHICLE OPERATOR'S LICENCE



Operating centre(s)

Operating Centre:	Address: LOW LANE MALTBY MIDDLESBROUGH TS8 0BW	Vehicles	3
		Trailers	1
Conditions Undertakings	or		

Operating Centre:	Address: HUDSON HOUSE CLEASBY WAY STOCKTON-ON-TEES TS16 0RD	Vehicles	5
		Trailers	10
Conditions Undertakings	or		

Transport Manager(s)

N/A

Specific conditions attached to licence

Specific undertakings attached to licence

9. HEAT TREATMENT CERTIFICATE



United Kingdom Wood Packaging Material Marking Programme

for Wood Packaging Material Manufactured in Great Britain

This is to certify that

Returnable Packaging Services Limited

Hudson House, Cleasby Way, Eaglescliffe, TS16 0RD

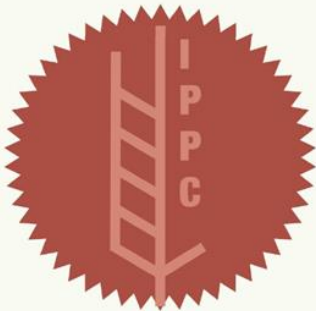
(manufacturer name and address)

has undergone an assessment and demonstrated that wood packaging material manufactured on the premises described above can be produced using the approved measures described below and specified in the International Standard for Phytosanitary Measures No. 15 of March 2002 on Guidelines for regulating wood packaging material in international trade, prepared by the Secretariat of the International Plant Protection Convention (IPPC). This certificate authorises the manufacturer to apply the ISPM No. 15 Mark in accordance with this certificate, including the Appendix, and the Plant Health (Wood Packaging Material Marking) (Forestry) (Great Britain) Order 2006.

Approved measure: Heat Treatment

Registration number: FC1251

Certificate valid until: 26 November 2023



A handwritten signature in black ink, appearing to read 'Ian Brunker'.

Signed on behalf of the Forestry Commission:



A handwritten signature in blue ink, appearing to be a stylized name.

Signed on behalf of timcon:



Signed on behalf of Forest Service:



10. HEALTH & SAFETY POLICY



Returnable Packaging Services Limited (RPS) operate a collection, repair and return service of transit packaging used by commercial enterprises including the Chemical, Pharmaceutical, Medical and Food industries. Through a need to help protect employee and public health and safety alongside the environment, RPS issues the following policy statement:

POLICY STATEMENT

RPS has a legal responsibility under section 2 of the Health & Safety at Work etc Act 1974 to safeguard its employees and the public at large so far as is reasonably practicable, from injury, nuisance or risk to health from any operations associated with its business. The company makes the same commitment towards protecting the environment.

RPS's policy is that the fulfilling of its legal responsibilities represents the minimum level of achievement in respect of health and safety at work.

A copy of the Health & Safety Policy will be made available to all employees, contractors and visitors and will be displayed on the RPS HSE notice board and in the HSE Management System file. Directors and Managers will ensure that employees understand and comply with the requirements.

RPS knows their obligation to consult with employees who may be affected as a result of any major changes in work operations or with the introduction of new equipment. The "Consultation with Employee Regulations" is satisfied. RPS complies with the "Safety Representative and Safety Committees Regulations 1977" including where appropriate, the setting up of a Safety Committee.

The company will seek professional advice on matters relating to health, safety and training via an external health and safety consultancy when required.

RPS Directors and Managers ask for, and expect, the full co-operation of all employees as detailed in sections 7 and 8 of the Health and Safety at Work etc Act 1974 in assisting them to achieve the objective of this policy. Employees are encouraged to put forward any improvements in H&S.

In particular we aim to improve overall health and safety and minimize incidents and / or accidents as part of our continuous improvement programme. These objectives and targets will be regularly reviewed, established and maintained through the company's Health, Safety & Environmental Management System to ensure continual improvements and prevention of incidents and / or accidents.

We aim to identify, develop and train employees designated to perform tasks which may have an impact on the environment or health and safety and also develop an overall health & safety awareness. These skills are provided to develop the company's own awareness in controlling its working area.

If necessary, financial resources will be made available for the continual improvement of health & safety and the wellbeing of employees, contractors and visitors. RPS intend to develop and maintain open relationships with the local public, local authorities, neighbouring companies, customers and suppliers and will inform them of our intentions to implement a Health, Safety & Environmental Management System to encourage a safe working environment.

By adopting this Health & Safety Policy and through monitoring and continuous improvements, RPS intends to make a commitment to the well-being of its employees and a safe working environment.

11. ENVIRONMENTAL POLICY



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12. CORPORATE ETHICS POLICY



Returnable Packaging Services Limited (RPS) recognises that an ethical framework is implemented within our business and that all employees aspire to work to the following principles.

In relationships with other:

- Treat all colleagues, customers, suppliers, contractors and the public with respect and professionalism, taking account of confidential
- issues when appropriate.
- Deal courteously with those who hold opinions that differ from our own.
- Respect cultural differences.
- Have an open and explicit relationship with government, the public, the private sector and other funders.

In our work:

- Operate with honesty and integrity in all of our work, taking steps to identify and deal with corrupt practises and professional misconducts.
- Be open and transparent in making decision and undertaking activities. If this is not possible be able to explain why.
- Work to the standards of UK legislation as a minimum here and abroad and operate according to local laws as required.
- Disclose conflicts of interest and actively manage them.
- Recognise appropriately the intellectual and operational contributions of others.
- Consider ethical challenges that may arise as part of work undertaken and manage accordingly.

Impact on the environment:

- Consider any possible adverse impacts of proposed works against the expected benefits while considering the economic, social and environmental dimensions.
- Assess and minimise the adverse impacts of our work on the natural environment, on people and on animal welfare.

All those covered by this policy are responsible for ensuring that activities for which they are responsible comply with this policy. People should raise any concerns with the senior management team immediately. Likewise, clear breaches of the policy should be communicated immediately to senior management.

- This policy is fully supported by the management and all members of staff.
- The policy will be monitored and reviewed annually.

13. CORPORATE AND SOCIAL RESPONSIBILITY POLICY



Returnable Packaging Services Limited (RPS) recognises the corporate and social importance of the businesses operations and values, whereby the interests of all employees, customers, contractors, the community and the environment are reflected in the company's policies and procedures.

The aim of this policy is to set out what RPS means by Corporate and Social Responsibility (CSR) and we propose to work towards achieving it.

By implementing this policy we aim to be responsible and be an exemplar of good practise.

RPS is committed to:

- Continuous improvement in our CSR strategy.
- Encouraging our business partners to strive for matching performance.
- Acting in a socially responsible way.
- Continually improving our performance and meeting all relevant legislation.
- Encouraging our staff to be mindful of the effect of their actions on any natural resource.

Standards of business conduct:

- We recognise that good CSR embraces all aspects of sustainable development and the way we affect people through our business operations.
- We will assess which social issues are of most relevance to the contract and decide at what stage this policy should be included.
- We shall operate in a way that safeguards against unfair business practises.
- We believe that a responsible approach to developing relationships between companies and the communities they serve, global or local, is a vital part of delivering business success.
- When carrying out our business, in consultation with our customers, we will determine the environmental, social and economic issues.
- We will continually review our policies and procedures to comply with this policy.

Corporate Governance:

- We will share and declare information on personal and corporate conflicts of interest and seek guidance from higher authorities before acting.
- We are committed to ensuring that our business is conducted in all respects according to rigorous ethical, professional and legal standards.
- All the laws that regulate and apply will be complied with.
- Through staff training and development we endeavour to ensure that our partners have confidence in our decision-making and management processes.
- All groups and individuals with whom we have a business relationship with will be treated in a fair, open and respectful manner.
- Competition will be reasonable and based upon the quality, value and integrity of the products and services being supplied.
- Feedback on performance will be actively sought, and we will continually review all activities to ensure best practise is observed at all times.
- We will allow our customers to give feedback on our performance and ensure that all customer comments are analysed, responded to and where appropriate acted upon to ensure continuous improvement is achieved.

13. CONTINUED



Human Rights:

- We aim to support and respect the protection of internationally proclaimed human rights.
- Contractors and suppliers are actively encouraged to observe international human rights norms within their work.

Environment:

- Our objective is to reduce our impact on the environment through a commitment to continual improvement, as part of our integrated Health, Safety and Environmental Management System.
- We will continue to work with our contractors and suppliers to reduce their impact on the environment.
- We analyse production, use and disposal of the goods we handle in an effort to make environmental improvements where possible.

Equality and Diversity:

- We aim to eliminate discrimination on any grounds and promote equality of opportunity in the supply chain.
- We will ensure that our customers, contractors and suppliers are able to work together in confidence and be treated with respect by each party.
- Our range of contracts will take account of the needs of a diverse customer base.

Sustainability:

- As part of continual improvement in line with our Health, Safety and Environmental Management System, we will set our policies and procedures to maintain sustainable business activities.
- We will seek to minimise the adverse environmental effects of the people that work for our business and our contractors and suppliers.
- We actively encourage the use of sustainable practises within our business, for example biomass.

Impact of Society:

- We will take steps to understand how we can most effectively support the needs of the local community and implement initiatives accordingly.
- Our impact on the local and wider community will be understood and nurtured.
- Dialogue with the local community shall be encouraged for mutual benefit.

Ethics and Ethical Trading:

- Training will be provided to relevant people on environmental and social issues affecting our supply chain.
- We will ensure that suppliers uphold the workplace standards and behaviours consistent with the Company's requirements.
- Contractors and suppliers will be worked with to help us achieve our policy aspirations.
- We shall encourage contractors and suppliers to adopt responsible business policies and practises for mutual benefit.
- We are committed to ensuring that the welfare of workers and labour conditions without our supply chain meet or exceed recognised standards.

14. CUSTOMER RELATIONSHIP POLICY



Returnable Packaging Services Limited (RPS) recognises the importance of the relationship it shares with all partnerships. This policy sets out our efforts to promote a productive working partnership in order to enhance our commitment to our clients.

RPS currently operates the following procedures:

- We have procedures in place to ensure our customer service levels are maintained at a high level at all times.
- Regular review meetings are arranged between RPS and its clients in order to measure customer satisfaction and developments. This is to ensure that all customer requirements are being met or exceeded.
- Regular review meetings are arranged between RPS and its contractors and suppliers to ensure that the highest level of customer service is being provided.
- We operate a non-conformance procedure in order to log any complaints and non-conformances in order for the Company to correct and prevent further occurrences.

In the event that a customer is displeased with the RPS service:

- A non-conformance will be raised to establish the reasons why RPS has not met the customer requirements.
- The relevant members of RPS staff will be informed with immediate corrective actions decided upon.
- Once the issue has been resolved, the team will then take no longer than 7 working days to agree upon preventative actions to ensure the issue does not reoccur.
- A will be set up with the customer to review the preventative actions.
- If an issue reoccurs RPS will take all available and reasonable actions to make sure a further reoccurrence does not happen. At all times the customer will be informed to ensure transparency of any decisions and changes to procedures that have been made.

In the event that a contractor or supplier does not perform to the level expected by RPS:

- A non-conformance will be raised to establish the reasons behind why the expectations of RPS have not been met.
- RPS will work closely with the contractor or supplier to resolve any issues and determine the best preventative actions.
- KPIs will be monitored by RPS to measure the performance of contractors and suppliers. These KPIs will ensure that the overall service delivered by RPS is at the highest level possible.
- This policy is fully supported by the management and all members of staff. The policy will be monitored and reviewed annually.

15. EQUAL OPPORTUNITIES POLICY



Returnable Packaging Services Limited (RPS) recognises that everyone has a contribution to make to our society and a right to equal opportunities.

No job applicant or employee, or organisation / individual to which we provide services will be discriminated against by us on the grounds of:

- gender (including sex, marriage, gender re-assignment),
- race (including ethnic origin, colour, nationality and national origin),
- disability,
- sexual orientation,
- religion or belief,
- age.

We aim to promote equal opportunities, eliminate discrimination and eliminate harassment through the following:

- Opposing all forms of unlawful and unfair discrimination.
- All employees (whether part time, full time or temporary) will be treated fairly and with respect.
- All vacancies will be advertised internally and externally simultaneously.
- Selection for employment, training or other benefit will be on the basis of aptitude and ability. All selection and rejection decisions will be recorded.
- All employees will be helped and encouraged to develop their full potential and the talents and resources of individuals will be fully utilised to maximise the efficiency of the organisation.
- All employees have a legal and moral obligation not to discriminate and to report incidents of discrimination against any individual or group of individuals to the senior management team.

Our commitment:

- To create an environment in which individual differences and the contributions of all our staff are recognised and valued.
- Every employee is entitled to be part of an environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- Training, development and progression opportunities are available to all staff.
- Equality is good management practise and makes sound sense.

Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings and termination of employment.

- This policy is fully supported by the management and all members of staff.
- The policy will be monitored and reviewed annually.

16. QUALITY POLICY



Returnable Packaging Services Limited (RPS) strives to be perceived by our customers, contractors and suppliers as a company whose products, services and support consistently exceed those of our competitors.

Our policy is to provide our products and services of the highest quality which fully satisfy our customer's requirements. Total quality management will be a permanent feature within our business. It will be implemented, monitored, nurtured and maintained by having a quality improvement programme, which will be achieved through our staff working together for success.

The aim is to ensure that:

- All systems and procedures will be designed to ensure that customer requirements will be fully understood and satisfied.
- All of our contractors and suppliers will be scrutinised to ensure the highest level of performance is given measured through KPIs.
- Achievement of the required quality standard is a core responsibility of all RPS employees. Each member of staff is given the opportunity to contribute to the continuous improvement programme. Training or development will be implemented if required to meet quality standards.
- In accordance to our procedures all activities will be planned and based upon minimising risk and eliminating errors.
- We will develop our employee's skills and increase their contribution through effective leadership, motivation and training.
- We will comply with our customer's quality requirements through the effective implementation of our procedures well as continually improving their effectiveness.
- All performance targets will be set with SMART objectives and measurements to ensure we establish and communicate meaningful results and drive continuous improvement.

It is a responsibility of all employees to understand and conform to the requirements of the Company's quality policy and to its systems and procedures.

- This policy is fully supported by the management and all members of staff.
- The policy will be monitored and reviewed annually.

17. ANIT-BRIBERY AND CORRUPTION POLICY



Returnable Packaging Services Limited (RPS) recognises the importance of an ethical framework within our business and that all employees aspire to work in line with the following principles. This policy sets out the company's procedures in relation to bribery and corruption.

RPS understands and recognises the following on bribery and corruption:

- Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.
- Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances.

Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

- Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.
- Under the Bribery Act 2010, bribery by individuals is punishable by up to ten years' imprisonment and / or an unlimited fine. If the firm is found to have taken part in the bribery or is found to lack adequate procedures to prevent bribery, it too could also face an unlimited fine.
- A conviction for a bribery or corruption related offence would have severe reputational and/or financial consequences for the firm.

RPS does not and will not tolerate bribery or corruption in any form. RPS upholds this policy by:

- Prohibiting the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement whether in cash or in any other form, in order to:
 - Gain any commercial, contractual or regulatory advantage.
 - Gain any personal advantage for individuals or anyone connected with the individual.

This policy is not intended to prohibit the following practises provided that they are appropriate:

- Normal hospitality.
- Fast tracking a process which is available to all on the payment of a fee.
- Providing resources to assist a person or company to make a decision more effectively provided it is for this purpose only.

17. CONTINUED



It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be taken up with the management.

The firm will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action.

RPS recognises the following areas in which bribery and corruption could occur:

- Excessive gifts, entertainment and hospitality.
- Facilitation payments to secure or accelerate business procedures.
- Reciprocal agreements unless they are legitimate business arrangements.
- Actions by third parties that RPS may be held responsible for.
- Record keeping ensuring all aspects of the business is transparent and not exploited to conceal bribes or corruption.

It is a responsibility of all employees to understand and conform to the requirements of the company's anti-bribery and corruption policy and to its systems and procedures.

- This policy is fully supported by the management and all members of staff.
- The policy will be monitored and reviewed annually.

18. CHILD LABOUR POLICY



Context

This policy is based on RPS's commitment to eliminate the practice of child labour.

Scope

This policy applies to all persons working for RPS or on our behalf in any capacity, including all employees, agency workers, volunteers, contractors, and suppliers.

Purpose

RPS does not employ any person below the age of eighteen years. RPS prohibits the use of child labour and forced compulsory labour anywhere within the business. No employee is made to work against their will or work as bonded/forced labour, or subject to coercion of any related work.

The implementation of this policy is the responsibility of all staff but with particular responsibility on the managers and directors who must not permit minors to work on the premises. Records of all employees, including age are maintained by RPS and are open to verification by any authorised person or relevant statutory body.

RPS has zero tolerance of this policy. If we find that any individuals or organisations working on behalf of RPS have breached this policy, RPS will ensure that appropriate action is taken.

19. MODERN SLAVERY POLICY



Context

Modern slavery is a term used to encompass slavery, servitude and forced and compulsory labour, child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Scope

This policy applies to all persons working for RPS or on our behalf in any capacity, including all employees, agency workers, volunteers, contractors, and suppliers.

Purpose

RPS is committed to ensuring there is no modern slavery or human trafficking in any part of the business. Our anti-slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships to ensure slavery and human trafficking is not taking place.

We have a zero-tolerance approach to slavery and human trafficking and expect all our employees, suppliers, partners, and contractors to comply with our values.

If we find that any individuals or organisations working on behalf of RPS have breached this policy, RPS will ensure that appropriate action is taken.