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The Waste Trade Company (Pty) Ltd 1998/007557/07

1. Preamble

“Sustainable Development” is a globally accepted approach to sustaining economic growth without harming our planet or exhausting its resources while improving the quality of life for its current and future inhabitants. Sustainability is deemed to make a significant contribution to any company’s success and to safeguarding its future development. Being founding members of The Waste Trade Company our aim is constantly seeking to modify its operations and strategies to meet universal acceptable principles in the areas of human rights, the environment, labour and anti-corruption and has clearly defined its commitment to the labour and anti-corruption principles of sustainable development.

Since 1998 The Waste Trade Company had been supporters of Social Responsibility Initiatives according to which companies work together to continuously improve their health, safety and environmental performance, as well as education of the public. We fully support the areas of Ethics, Labour Rights, Health and Safety, Environment and related management systems and legal areas where the ethical and legally compliant behaviour of The Waste Trade Company employees is of utmost importance to the company’s well-being.

The Waste Trade Company Code of Conduct takes into account the well-established principles of sustainability that also have been incorporated in some important internal regulations of The Waste Trade Company group.

Sustainability is a key element of The Waste Trade Company’s values and forms an integral part of our business strategy.

The Waste Trade Company’s Human Rights Position underscores its principles in upholding the areas of human rights and working conditions up to National and International Standards.

All these activities demonstrate how The Waste Trade Company assumes its responsibility concerning social, ecological and ethical standards of how The Waste Trade Company put into practice the principles of sustainable development in their daily operations.

The Waste Trade Company expects all its suppliers, contractors and subcontractors to share the principles which are expressed in this Supplier Code of Conduct and that comprise an important component of supplier selection and evaluation. Furthermore, we expect our suppliers to replicate these standards further down the supply chain.

The Supplier Code of Conduct is therefore made available to our suppliers with the goal of strengthening our mutual understanding of how sustainability should be practiced in day-to-day business.



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2. Ethics

To meet social responsibilities, suppliers are expected to conduct their business in an ethical manner and to act with integrity. Ethical requirements include the following aspects:

2.1. Business Integrity

Suppliers are expected not to practice or tolerate any form of corruption, extortion, or embezzlement. Suppliers will not offer or accept bribes or other unlawful incentives to/from their business partners. Suppliers are expected not to offer to The Waste Trade Company employee's gifts or any other kind of personal benefit resulting from the relationships with the suppliers.

2.2. Privacy & Intellectual Property

Suppliers will safeguard and make only appropriate use of confidential information and ensure that all employees and business partners' privacy and valid intellectual property rights are protected as per the South African POPIA Act 37067 of 2013.

2.3. Identification of Concerns by Whistle Blowers

Suppliers will provide means for their employees to report concerns or potentially unlawful activities in the workplace in a safe, confidential and protected manner. Suppliers will investigate such reports and take action if needed.

2.4. Standards when Conducting Clinical Trials (Chemical Companies)

Suppliers are expected to conduct clinical trials in accordance with the international guidelines, the current national and local laws and regulations and the strictest medical, scientific and ethical principles.

2.5. Fair Competition

Suppliers will conduct their business in line with fair competition and in accordance with all applicable anti-trust laws.

3. Labour

Suppliers are expected to protect the human rights of their employees and to treat them with dignity and respect as per the South African Human Rights Commission Act No 40 of 2013. This includes the following aspects:

3.1. Child Labour Avoidance

We do not tolerate child labour in our supply chain. Suppliers should avoid any sort of child labour in their business operations.

3.2. Freely Chosen Employment

We do not tolerate slavery, servitude and forced or compulsory labour and human trafficking in our supply chain, bonded, indentured or involuntary prison labour is not accepted as well.



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3.3. Diversity and Inclusion

Equal treatment of all employees will be a fundamental principle of the Supplier's corporate policy. Typical discriminatory treatment takes into consideration consciously or unconsciously – irrelevant characteristics of an employee such as race, national origin, gender, age, physical characteristics, social origin, disability, union membership, religion, family status, pregnancy, sexual orientation, gender identity, gender expression or any unlawful criterion under applicable law. Suppliers will ensure that their employees are not harassed in any way. The Waste Trade Company encourages suppliers to provide an inclusive and supportive working environment and to exercise diversity when it comes to their employees as well as in their decisions to select sub-contractors.

3.4. Fair Treatment

Suppliers will provide their employees with a workplace free of harsh and inhumane treatment, without any sexual harassment, sexual abuse, corporal punishment, or torture, mental or physical coercion or verbal abuse of employees, or the threat any such treatment. Furthermore, Suppliers are expected not to unfairly terminate any employment contract or without clear evidence specify that the termination of an employment contract, in relation to the working performance of an employee, is permitted by law.

3.5. Working Hours, Wages and Benefits

Working hours for Suppliers' employees will not exceed the maximum set by the applicable South African Basic Conditions of Employment Act of 1997. Compensation paid to employees will comply with applicable national wage regulations and ensure an adequate standard of living. Unless otherwise provided by local laws, deductions from basic wages as a disciplinary measure will not be permitted (this does exclude the entitlement of damages on a contractual or legal basis). Suppliers are expected to provide their employees with fair and competitive compensation and benefits. Compensation and benefits should aim at providing and adequate standard of living for employees and their families. Suppliers' employees will be paid in a timely manner. It is recommended that Suppliers offer their employees ample training and education opportunities.

3.6. Freedom of Association

Suppliers will be committed to an open and constructive dialogue with their employees and workers' representatives. In accordance with local laws, Suppliers will respect the rights of their employees to associate freely, join labour unions, seek representation, join work councils, and engage in collective bargaining. Suppliers will not disadvantage employees who act as workers' representatives.

3.7. Conflict of Interest

The Waste Trade Company require all suppliers that have private interests that may, or actually do influence the decisions that are being made, to declare such interests whether as employee or on behalf of an organization.



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4. Health, Safety, Environment and Quality

Suppliers are expected to provide a safe and healthy working environment and to operate in an environmentally responsible and efficient manner. Suppliers will integrate quality into their business process. This comprises the following aspects:

4.1. Quality Requirements

Suppliers will meet generally recognised or contractually agreed quality requirements in order to provide goods and services that consistently meet The Waste Trade Company's needs, perform as warranted and are safe for their intended use.

4.2. Health, Safety, Environmental and Quality Regulations

Suppliers will comply with all the applicable quality, health, safety, and environmental regulations. All required permits, licenses and registrations will be obtained, maintained, and kept up-to-date. Suppliers will full-fill their operational and reporting requirements.

4.3. Product Safety

Material safety data sheets containing all necessary safety-related information will be made available by Suppliers for all hazardous substances and will be provided to The Waste Trade Company and other parties in case of a legitimate need.

4.4. Occupational Health and Safety


Suppliers will protect their employees from any chemical, biological and physical hazards and physically demanding tasks in the workplace as well as from risks associated with any infrastructures used by their employees. Suppliers will provide appropriate controls, safe work procedures, preventative maintenance and necessary technical protective measures to mitigate health and safety risks in the workplace. When hazards cannot be adequately controlled by these means, Suppliers will provide employees with appropriate personal protective equipment. Safety information relating to hazardous materials – including compounds in intermediate materials – shall be available to educate, train and protect workers from hazards. A safe and healthy working environment also includes as a minimum potable drinking water, adequate lighting, temperature, ventilation, and sanitation.

4.5. Process Safety

Suppliers will have safety programs in place for managing and maintaining all their production processes in accordance with applicable safety standards. Suppliers will address product-related issues and their potential impact during all stages of the production process. For hazardous installations the Supplier will conduct specific risk analyses and implement measures that prevent the occurrence of incidents such as chemical releases and/or explosions.

4.6. Emergency Preparedness, Risk Information & Training

Suppliers will make available safety information on identified workplace risks and suppliers' employees will be correspondingly trained to ensure they are adequately protected. Suppliers will identify and assess likely and potential emergency situations in the workplace and minimize their impact by implementing emergency plans and response procedures.

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4.7. Waste & Emissions

Suppliers will have systems in place to ensure the safe handling, movement, storage, recycling, reuse and management of waste, air emissions and waste water discharges. Any of these activities that have the potential to adversely impact human or environmental health will be appropriately managed, measured, controlled and handled prior to release of any substance into the environment. Suppliers will have systems in place to prevent or mitigate accidental spills and releases into the environment.

4.8. Resource Conservation and Climate Protection

Suppliers are expected to use natural resources (e.g. water, energy sources, raw materials) in an economical and sparingly way. Negative impacts on the environment and climate (i.e. by the use of non-renewable resources) will be minimized or eliminated at their source or by practices such as the modification of production, maintenance and facility processes, material substitution, conservation, recycling and material reutilization. Suppliers will engage in the development and use of climate-friendly products and processes to reduce power consumption and greenhouse gas emissions.

4.9. Security

Suppliers will have good security practices across their supply chains. Suppliers will maintain processes and standards that are designed to assure the integrity of each shipment to The Waste Trade Company from its origin through to its destination as well as all points in between.

4.10. Counterfeit Operations

Suppliers are expected to implement the necessary and appropriate measures in their area of responsibility to ensure that The Waste Trade Company stay within the legal supply chain and do not unknowingly take part in strengthening the counterfeit market in South Africa.

5. Management Systems

Suppliers are expected to implement management systems to facilitate compliance with all applicable laws and to promote continuous improvement with respect to the expectations set forth in the Supplier Code of Conduct. This includes the following aspects:

5.1. Legal & Other Requirements


Suppliers will comply with all applicable laws, regulations, contractual agreements and generally recognized standards.

5.2. Communications of Sustainability Criteria in the Supply Chain

Suppliers will communicate the principles set forth in the Supplier Code of Conduct to their supply chain.

5.3. Commitment and Accountability

Suppliers are encouraged to fulfil the expectations set forth in this Supplier Code of Conduct by allocation appropriate resources.

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5.4. Risk Management

Suppliers are expected to implement mechanisms to identify, determine and manage risks in all areas addressed by this Supplier Code of Conduct and with respect to all applicable legal requirements.

5.5. Documentation

Suppliers are expected to develop adequate documentation to demonstrate that they share the principles and values expressed in this Supplier Code of Conduct. This documentation may be reviewed by The Waste Trade Company upon mutual agreement.

5.6. Training and Competency

Suppliers will establish appropriate training measures to allow their managers and employees to gain an appropriate level of knowledge and understanding of this Supplier Code of Conduct, the applicable laws and regulations and generally recognized standards.

5.7. Continuous Improvement

Suppliers are expected to continuously improve their sustainability performance by implementing appropriate measures.


KAY HARDY
GENERAL MANAGER


MALENE LOUW
COMPLIANCE ADMINISTRATOR

6. References

- 6.1. SANS 14001:2015
- 6.2. Competition Act No 89 of 1998
- 6.3. Competition Amendment Act 18 of 2018
- 6.4. Ergonomics regulations 42894 of 6 December 2019
- 6.5. SA Constitution Chapter 2 – Bill of Rights
- 6.6. SAHRC My Rights My Responsibility Booklet Revised 20 March 2018
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