

ETHICS AND SUSTAINABLE DEVELOPMENT CHARTER FOR RENFREW TRANSPORT LTD t/a ALWAYS FREIGHT SOLUTIONS and its, SUPPLIERS AND CONTRACTORS

INTRODUCTION

Sustainable development is a driver of Renfrew Transport Ltd t/a Always Freight Solutions (Always F.S.) strategy. It means strongly and actively responding to 'Always F.S. stakeholders' social needs and expectations and anticipating new environmental, social and economic developments.

Always F.S. supports the United Nations Global Compact initiative, which invites companies to embrace, support and enact a set of core values in the areas of human rights, employment standards, environment and ethics. Always F.S. is committed to the highest standards of business conduct and ethics, principles which are outlined here and also summarised in Always F.S. Code of Ethics, available on the Always F.S. website (<https://alwaysfreight.co.uk/>).

In addition, Always F.S. has implemented a sustainable development policy specifically ensuring the vehicles we source are at the forefront of modern technology minimising their pollutive effect on the planet. Always F.S. ensures our fleet is maintained and serviced regularly to ensure they run efficiently. This also includes planning of journeys to ensure no unnecessary use of our vehicles. Sourcing is one of our key policy components. Always F.S. therefore requires its staff and requests its Suppliers and Contractors to take part in this initiative by committing themselves in a continuous improvement approach towards the principles listed in this Charter for Ethics and Sustainable Development.

PRINCIPLES

Always F.S. and its Suppliers and Contractors shall at least be compliant with the United Nations' Universal Declaration of Human Rights, the International Labour Organization's Fundamental Conventions, the Guiding Principles of the Organisation for Economic Co-operation and Development (OECD), the rules of conduct of the International Chamber of Commerce (ICC) and any other relevant international conventions and national and local regulations, which are applicable to their activities in the country(ies) in which they operate. Always F.S. reserves the right to request from Suppliers and Contractors their means of demonstrating their commitment to this.



1- LABOUR STANDARDS

Always F.S. and its Suppliers and Contractors shall in particular comply with the following:

- Elimination of all forms of illegal, forced or compulsory labour
- Elimination of child labour: Always F.S. and its Suppliers and Contractors shall not employ persons not having reached the minimum age required for work and shall never support the use of child labour, except as part of an official government approved educational youth training scheme
- Elimination of discrimination of any kind in respect of employment and occupation
- Compliance with applicable laws and regulations related to maximum working hours and minimum days of rest;
- Compliance with applicable laws and regulations related to the minimum level of wage
- Respect for freedom of association for their employees, in compliance with applicable laws
- Compliance with applicable laws and regulations related to redundancy or suspension

2- ETHICS

- **Commitment to Integrity**

Always F.S. has a firm commitment to conducting business with the highest level of integrity. This Charter for Ethics and Sustainable Development is essential to ensure proper conduct and a successful business relationship with our external partners. Always F.S. and its Suppliers and Contractors shall strictly comply with all applicable legal requirements related to their activities and business environment and with Always F.S. commitments to international conventions. These Ethics & Compliance principles will be applied to the management of interactions between Always F.S. and its Suppliers and Contractors.

- **Prevention of Corruption and Bribery**

Always F.S. prohibits all unlawful payments and practices. We reject corruption in all of our business transactions and we are fully committed to complying with all applicable anti-corruption laws and regulations in the countries where we are present. Bribes, kickbacks and money laundering are strictly prohibited. A bribe or kickback is the giving or accepting of money, fees, commissions, credits, gifts, favours, or anything of value that is either directly or indirectly provided in return for favourable treatment. We expect our suppliers to adhere to these same prohibitions when conducting business.

- **Gifts and Hospitality**

Suppliers and Contractors should refrain from offering gifts and hospitality to Always F.S. employees. Always F.S. will refuse all gifts and hospitality that are not of reasonable, modest and symbolic value, nor occasional, transparent and cannot be reciprocated.



- **Conflicts of Interest**

A conflict occurs when your private interests interfere – or appear to interfere with the interests of Always F.S. Your company should base its business decisions on your company’s needs, rather than on the personal interests of your employees, the interests of family or friends, or any other reason that creates a conflict which could impact either party’s objectivity. In this regard, be aware that any personal business relationships that you or your company may have with an employee, supplier, customer or competitor of Always F.S. should never influence the decisions you make on our behalf.

- **Compliance with Competition Law**

Competition laws ensure that companies compete fairly in the market. Any agreement with competitors that has the purpose or effect of fixing prices, distorting a bidding process, sharing markets or customers, limiting production or boycotting a customer or supplier is prohibited. In your capacity as a supplier supporting Always F.S., if you are required to gather information about our competitors, only gather such information from public sources freely available to others. Never spy or steal in order to obtain proprietary or confidential information.

- **Data Privacy**

All suppliers will undertake to collect and process all personal data in compliance with Always F.S. policy, current data protection laws and regulations applicable to the processing of this data in the specific jurisdiction where services are provided. Any personal data handled by suppliers will be processed only on behalf of Always F.S. and suppliers are not permitted to use personal data on their own behalf or on behalf of a third party.

3- ENVIRONMENT

Always F.S. and its Suppliers and Contractors shall implement and/or pursue initiatives that contribute to the preservation of the environment and mitigation of their impact on natural resources.

Always F.S. and its Suppliers and Contractors shall limit the amount of waste material generated from their operations and ensure the disposal of such waste in a manner that is respectful to the environment.

Always F.S. and its Suppliers and Contractors shall limit the use of hazardous substances. In the event no alternative is available, Always F.S. and its Suppliers and Contractors shall ensure their safe handling and disposal. Always F.S. and its Suppliers and Contractors shall promote the development of environment friendly technologies (e.g. controlling pollutant, CO2 emissions, etc.) as well as energy saving and recycling solutions, and implement logistics strategies that minimise environmental impacts (notably with respect to storage, packing and transportation).



4- OCCUPATIONAL HEALTH AND SAFETY

Always F.S. and its Suppliers and Contractors shall ensure that their activities are safe for the health of their employees, their own contractors, the local community and the users of their products.

Always F.S. and its Suppliers and Contractors shall adopt a proactive attitude to health and safety issues. Risks linked to their activity shall be identified, evaluated and either eliminated or mitigated.

Always F.S. and its Suppliers and Contractors shall respect specific obligations as well as other measures referring to health monitoring record keeping and exposure limits from the use of Carcinogenic, Mutagenic and Reprotoxic substances (CMR) and Asbestos or material containing Asbestos. Always F.S. Suppliers and Contractors shall not supply any product / mixture / chemical that would not comply with Always F.S. hazardous substances requirements.

Always F.S. is working actively to continuously improve the safety of all people working at its sites or the site of its customers. When performing work at sites, Always F.S. staff, Suppliers and Contractors are expected to achieve high standards of occupational health and safety. Always F.S. Staff, Suppliers and Contractors are responsible for immediately notifying the existence of any abnormal situation observed to the relevant Always F.S. managers at the affected site.

5- PRODUCTS AND SERVICES

Always F.S. Suppliers and Contractors shall integrate eco-design principles into the development of their products and services in order to eliminate or mitigate negative environmental, health and safety impacts from their products during their life cycle, while maintaining and/or improving the quality of usage of their products. Consequently, Always F.S. suppliers shall seek, develop and propose low environmental footprint solutions i.e. being energy and material efficient, hazardous substances free, low noise emissions, easy recyclable solutions and any other relevant solutions.

Suppliers shall prove that their products comply with the regulations related to the use of hazardous substances in particular with the REACH European Regulation (1907/2006/EC) for the European market.

Always F.S. and its Suppliers and Contractors shall never use prohibited substances in any equipment and packaging supplied.

Always F.S. suppliers and contractors that produce/supply goods containing tin, tantalum, tungsten or gold (3TG) commit to supporting Always F.S. in implementing a responsible supply chain in reference to the OECD Due-Diligence Guidance for Responsible Supply Chain of Minerals from Conflict-Affected and High-Risk Areas.

Always F.S. Suppliers and Contractors commit as a consequence to require from their own supplier's similar commitment in order to establish a chain of custody to the smelters and refiners.



IMPLEMENTATION AND CONTINUOUS IMPROVEMENT

This Charter for Ethics and Sustainable Development constitutes an integral part of all contractual documents entered into between Always F.S. and its Suppliers and Contractors.

Always F.S. requires its Suppliers and Contractors to hereby represent and warrant to cascade the principles contained in this Charter for Ethics and Sustainable Development to their own suppliers and contractors and to implement a similar continuous improvement and compliance approach.

By adhering to this Charter for Ethics and Sustainable Development, each Supplier and Contractor of Always F.S. accepts their responsibility under this charter and will provide proof of their adherence where this is reasonably requested. Compliance and improvement towards the above-mentioned principles is part of Always F.S. Suppliers and Contractors overall assessment. Suppliers and Contractors shall freely determine their appropriate improvement action plans to increase their performance in the field of sustainable development.

Since Always F.S. is building its relationship with its Suppliers and Contractors in a continuous improvement approach, Always F.S. may support its Suppliers and Contractors in the definition and implementation of action plans aimed at improving their performance in the fields envisaged by this Charter for Ethics and Sustainable Development.

I HEREBY ACKNOWLEDGE that I am an authorized representative of the company referenced below, have carefully reviewed and understood the substance of the above document, and confirm that this company is in full compliance with Always F.S. Charter for Ethics and Sustainable Development.

Supplier Company Name: _____ Supplier representative name (Block Capitals)
_____ Title of supplier representative (Block Capitals) _____

Date: _____

Signature and company stamp

Original copy to be signed and sent back to Always F.S. Office Manager

