



Employee Policies

Document Details:

Company Name: Circularity Direct Ltd

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Date: 6th January 2025

Responsible Body: Board of Directors

Approved By: Omer Kutluoglu, Managing Director

Health & Safety Policy

Introduction

Circularity Direct Ltd is committed to ensuring the health, safety, and well-being of all employees, contractors, and visitors. We recognize our duty to comply with all relevant health and safety legislation, including the Health and Safety at Work Act 1974.

Responsibilities

- Senior management will establish a strong health and safety culture, ensuring legal compliance.
- Employees must take reasonable care of their own health and safety and that of others around them.
- Managers will conduct frequent and comprehensive risk assessments to proactively address hazards.
- A dedicated Health & Safety Officer will oversee implementation, monitoring, and training.

Procedures

- Emergency response planning, including fire drills, first aid stations, and evacuation procedures.
- Development of incident reporting systems to address and prevent workplace accidents.
- Regular employee training on workplace hazards, proper equipment use, and safe practices.

Compliance & Review

- Full adherence to the Health and Safety at Work Act 1974 and other industry regulations.
- Annual policy reviews and assessments to ensure continued alignment with legal standards.
- Open reporting culture where employees can raise safety concerns without fear of reprisal.
- Implementation of corrective actions based on incident analysis and lessons learned.

Equal Opportunities Policy

Introduction

Circularity Direct Ltd is committed to fostering an inclusive workplace where every individual has equal

access to opportunities, free from discrimination, in compliance with the Equality Act 2010.

Key Principles

- Fair recruitment, promotion, and career development opportunities for all employees.
- Active measures to prevent discrimination, harassment, and victimization.
- Implementation of workplace accommodations to support employees with disabilities.
- Encouragement of diverse leadership and decision-making representation.

Implementation

- Structured diversity and inclusion training for employees and leadership.
- Anonymous feedback channels for employees to raise concerns.
- Auditing of hiring, promotion, and remuneration practices to maintain fairness.

Legal Compliance

- Compliance with the Equality Act 2010, ensuring equal rights and non-discriminatory policies.
- Regular policy updates in response to evolving legal frameworks and best practices.
- Establishment of a dedicated HR team to oversee equal opportunities practices.

Anti-Bribery & Corruption Policy

Introduction

Circularity Direct Ltd enforces a strict zero-tolerance policy on bribery and corruption in accordance with the UK Bribery Act 2010.

Prohibitions

- Employees must not offer, solicit, or accept bribes, including monetary and non-monetary incentives.
- All facilitation payments, kickbacks, and unethical corporate hospitality are strictly forbidden.
- Any charitable donations or sponsorships must be transparent and pre-approved.
- Potential conflicts of interest must be disclosed to management.

Responsibilities

- Mandatory reporting of suspected bribery cases through a confidential internal system.
- Senior management will oversee corruption risk assessments and compliance measures.
- Third-party partners, suppliers, and contractors must adhere to our anti-corruption standards.

Enforcement & Training

- Regular compliance audits and internal reviews to prevent bribery risks.
- Comprehensive employee training on ethical decision-making and risk assessment.
- Immediate disciplinary action, including termination and legal consequences, for any violations.

Modern Slavery Policy

Introduction

Circularity Direct Ltd is committed to eradicating modern slavery and human trafficking within our operations and supply chains, in compliance with the UK Modern Slavery Act 2015.

Commitments

- Zero tolerance for forced labor, servitude, human trafficking, and child labor.
- Thorough supplier vetting to ensure ethical sourcing and labor practices.
- Conducting modern slavery risk assessments and due diligence in high-risk areas.
- Active participation in industry efforts to combat modern slavery.

Implementation

- Employee awareness campaigns and mandatory training on identifying modern slavery.
- Rigorous supplier audits to assess working conditions and ensure ethical compliance.
- Establishment of confidential whistleblowing mechanisms to report concerns safely.
- Enforcement of contractual obligations requiring suppliers to meet ethical labor standards.

Monitoring & Compliance

- Annual public disclosure of modern slavery prevention efforts.
- Continuous policy updates to align with evolving legal standards and ethical requirements.
- Collaboration with governmental agencies, NGOs, and labor rights organizations.
- Regular assessment of supply chain risks to ensure transparency and accountability.

Approval:

Signed by: Omer Kutluoglu

Position: Managing Director

Date: 6th January 2025

A handwritten signature in black ink, appearing to read 'Omer Kutluoglu', is written over a faint, circular watermark. To the right of the signature, there are several small black dots arranged in a horizontal line.