

# Code of Ethics and Conduct

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### Code of Ethics

Our commitment to ethical behaviour and solid ethical foundations are one of our most essential components. We are committed to doing business the right way based on a culture of ethics and compliance and in performing our jobs should always act lawfully, ethically and in the best interests of the business.

**VISION** – We give every surplus asset a new lease of life and by doing the right thing inspire those we work with to accelerate sustainability.

**VALUES** - Focus on providing disposal solutions. Use integrity in everything we do. Be transparent and accountable. Have mutual trust and respect for each other.

**AIMS** – To develop and grow our business making it a stable and enjoyable place to work where we, our customers and clients feel valued and reassured.

This code of ethics, along with our various policies, serve as our commitment and guide to proper business conduct for all of our stakeholders. We are committed to doing business legally, ethically and in a transparent manner. This document applies to everyone who works here. We expect you to be impartial and honest in all affairs relating to your job and do nothing to destroy the trust necessary for employment.

The success of our business is based on the trust we earn from our employees, customers and shareholders. We gain credibility by adhering to our commitment to fairness and reaching our goals solely through ethical conduct. All staff are expected to adhere to this code in their professional, as well as personal conduct, treat everyone with respect, honesty and fairness.

Ramco is open to any questions and will not allow punishment or retaliation against anyone for reporting a misconduct in good faith. Managers have a responsibility for demonstrating the importance of this code, addressing ethical questions or concerns. Non-compliance to this code is considered misconduct that could warrant disciplinary action including termination of employment.

Ethical conduct is a value-driven decision-making process. Several key questions can help to identify situations that may be unethical, inappropriate or illegal. Ask yourself:

- Is what I am doing legal?
- Does it reflect our company values and ethics?
- Does it comply with the code and company rules/policies?
- Does it respect the rights of others?
- How would it look if it made the news headlines?
- Is this the right thing to do?

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Our supply chain relationships are built upon trust and mutual benefits compliant with competition law. We are dedicated to ethical and fair competition as we sell services based on their quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities, nor will we engage or assist in unlawful boycotts of particular customers. We commit to comply with all applicable trade controls, restrictions, sanctions and import-export embargos.

Thank you for helping me to uphold our vision, values and aims by doing the right thing. It does not only mean that we provide an exceptional quality service, but it also means that ethics and integrity is always born in mind.

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It is vital that we each present a professional image and attitude to our visitors, customers, clients and colleagues. Please take an interest and responsibility for yourself and your work area. As a team we need to work hard and work together to maintain an effective, pleasant environment. Be aware of your appearance, manner and body language. If you have any concerns about how to behave, please speak to your manager for assistance. Inappropriate, unprofessional behaviour will not be tolerated. Please adopt a common-sense approach at all times and remember that you are working in a small business entrepreneurial environment. Be happy and enjoy your work.

This policy applies to everyone regardless of employment agreement or rank. You are bound by your contract to follow our Code of Conduct while performing your duties. The components of our Code of Conduct are as follows:

- All employees must protect our company's legality. They should comply with all environmental, health, safety and fair dealing laws. We expect you to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.
- All employees should respect their colleagues. We won't allow any kind of discriminatory behaviour, harassment or victimization. You should conform with our equality diversity and inclusion policy in all aspects of your work, from recruitment and performance evaluation to interpersonal relations.
- All employees should treat our company's property, whether material or intangible, with respect and care. You shouldn't misuse it or use it frivolously, protecting it from damage and vandalism whenever possible.

In order to support our commitment to compliance with applicable laws and international ethical standards please "Speakup" and report concerns regarding any kind of unlawful behaviour or violation of internationally acknowledged convention. Please raise your concern directly with any member of the management team or Director. In order to ensure efficient and timely investigations of the reported incident, please include as much information as possible with your report and if possible, the following information:

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- Who did or saw something?
- What happened?
- When did it occur?
- Where did it occur?
- Why did it happen?
- How did it happen?

The report can be made anonymously. The submitted incident reports are handled confidentially and in a way which avoids any retaliation towards the reporting person.

### **Job Duty and Authority**

All employees should fulfill their job duties with integrity and respect toward customers, stakeholders and the community. Supervisors and managers mustn't abuse their authority. We expect them to delegate duties to their team members taking into account their competences and workload. Likewise, we expect team members to follow team leaders' instructions and complete their duties with skill and in a timely manner.

Ramco is committed to the continuous development of all its employees and maximising their potential in the Company. As such we have a training and development policy that maintains a Skills Qualification and Experience (SQE) matrix for every employee.

### **Working Hours and Breaks**

You are expected to attend work punctually at the hours defined in your contract of employment. Persistent lateness and poor attendance will result in disciplinary action being taken. You are expected to be ready to work at the start of your shift (for instance, if you are office-based, you should be at your desk with your computer switched on and operating, by the time your shift is due to start).

Your basic hours of work are 8 am to 5 pm, Monday to Friday inclusive. You will be allowed 1 hour per day for lunch. You may be required to work extra hours as may be necessary, at such places as the company shall at time to time specify.

If you are working for more than 6 hours in the day, you are entitled to unpaid breaks totalling one hour in that day. Lunch is to be taken at the time allocated to your shift pattern and should be a minimum of 30 minutes. If you wish to take one or more short breaks during your working day, then these should be agreed with your line manager to fit in with the departmental workload. Any such short break will be counted as a unit of 10 minutes and should not practically exceed that time.

If you are working for less than six hours in the day, you are entitled to unpaid breaks totalling 30 minutes in that day. Leaving the premises at any time, other than during your lunch break, must be authorised by your line manager. In exceptional circumstances, where you need to take a lunch break longer than one hour, this should be discussed with your line manager.

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### **Dress Code**

Clients, prospective clients and customers make frequent visits to our offices. In order to convey our high standards of quality and professionalism, it is important that all our staff maintain high standards of dress and appearance.

Your overall appearance should always be appropriate to the office workplace. Where a uniform is provided, (clothing and footwear) it should be worn. Where it is not provided, clothes should be smart casual, neat, clean and well-pressed. Footwear should be clean. Trainers or jeans are not allowed. Your hair should be neat and tidy.

If, in the opinion of your line manager, your appearance is inappropriate to our working environment, you may be asked to return home and change. Your time away from the workplace may be deducted from your salary.

### **Salary Payment and Benefits**

Your salary will be paid into your nominated bank or building society account on or before the last working day of each calendar month. To allow for payroll calculation time, actual hours worked will be included up to a cut-off date, near the end of the month and you will receive payment at the basic rate for the remaining days. Any necessary adjustments will be made in the following salary payment. We expect employees to not abuse their employment benefits. This can refer to time off, insurance, facilities, subscriptions or other benefits our company offers.

Ramco operate various employee benefits policies designed to provide financial security, promote well-being, and support a positive work environment. We clearly communicate these benefits to employees ensuring transparency and consistency. These benefits are provided to enhance employee satisfaction, support work-life balance, and foster loyalty and engagement within the company. They apply to all employees both full-time and part-time and include:

- Pension contributions
- Statutory sick pay
- Holiday entitlement
- Parental leave
- Health & wellness benefits

We are committed to providing a comprehensive benefits package to support our employees' well-being and professional growth. We review our policies annually to ensure compliance with legal requirements and alignment with business objectives. They ensure transparency and consistency in the administration of employee benefits with any changes being communicated in a timely manner.

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### Expenses

All business travel arrangements must be agreed with your line manager. Ramco will pay agreed expenses related to company business. There is a subsistence allowance to cover staying in a hotel, food and drink, etc while you are away on company business. You must produce valid receipts in order to claim the allowance.

### Acceptance of Gifts, Benefits and Invitations

From time to time, certain companies may offer incentives and benefits to our employees. These may take various forms, such as discounted or complimentary accommodation and gifts. Invitations may be received to attend special events and parties. It is Ramco's view that we all work as a team, and that therefore no individual member of staff should necessarily benefit from such incentives. All gifts, benefits, invitations and offers must be declared to, and discussed with, your line manager. Where appropriate, the directors may authorise their use/acceptance or find a way for the whole team to benefit. This policy is made clear to all our suppliers and clients as appropriate.

### Charitable Donations

Ramco will donate to charity by supporting and rewarding the combined or individual fundraising efforts of its employees. Every employee or group of employees raising money for charitable causes can apply to have their efforts match funded. The following criteria shall apply:

- Approval from a Ramco manager must be sought prior to commencing a fundraising event and Ramco's commitment will be entirely at that manager's discretion.
- Match funding will be provided on a first come first served basis up to a maximum of £500 per employee per financial year.
- Donations up to a maximum of £1,000 per financial quarter (January to March etc.) will be made available, although any unused entitlement will not be carried forward and therefore considered lost.
- The charity must be registered in the UK and payments will be made directly to that charity. Cash, cheques or other forms of payment to individuals will not be available.

Only Ramco employees will qualify. Any fundraising events undertaken by friends or family of Ramco employees will not be considered although other forms of sponsorship may still be considered on a case by case basis. These should be brought to the attention of a Ramco manager and will be awarded entirely at that manager's discretion.

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### **Staff Purchases**

From time to time there may be certain items of equipment that staff wish to purchase themselves. Purchasing an item of equipment for your own use is permitted, however purchasing items for subsequent resale and personal gain is against the ethos of the Company and will not be permitted. Neither will asking a third party to buy the item of equipment on your behalf.

Purchasing items of equipment that are listed for sale through a competitive process such as eBay or an online tender will be deemed acceptable, however the same ethos of 'own use' still applies. For items of equipment that are not available through a competitive process, the member of staff should firstly raise the matter with their line manager who will seek senior management approval where required.

Frequently there are clauses contained within the various contracts that the Company operate which either restrict or prohibit Company employees from actually purchasing items of equipment. We risk damaging our contractual relationships by ignoring these clauses so if you are in any doubt please ask.