

# Document Management System

# Global CtL Corporate Social Responsibility (CSR) Policy

# **Policy Statement**

Close the Loop (CtL), as a member of the international business community, recognises that its business activities have an impact on the quality of people's lives, not only today but in the future. Our licence to operate is granted by all members of the communities within which we operate. By acknowledging this, we can live up to the expectations of all our stakeholders and future generations.

The Company is dedicated to enhancing the environmental outcomes or reducing the environmental impacts of its customers in ways that are commercially sustainable on a long-term basis. The benefits of sustainable solutions are permanent and immediate and are to be achieved in ways that minimise the Company's own impact on the environment and society at large. With this in mind, the objective of the CtL Corporate Social Responsibility (CSR) Policy is to provide a reference point to guide stakeholders, including all employees, on the elements that drive the conduct of CtL's business. These are reflected in the following policy statements:

## **Standards of Business Conduct (Code of Ethics)**

We are committed to ensuring that our business is conducted in all respects according to rigorous ethical, professional and legal standards. The Company accepts that it has a moral obligation to act as a responsible corporate citizen in all jurisdictions.

### **Environment**

Our objective is to reduce our impact on the environment including factors contributing to climate change, through a commitment to continual improvement and to comply with environmental legislation and regulations. The Company's actions are driven by its commitment to zero waste, its application of international Environmental Management System (ISO 14001) Standard and R2 Standard (US only).

# **Health and Safety**

The welfare and safety of our employees is paramount. We are committed to a program of activities to achieve continuous improvement in health and safety performance through accreditation of OHSAS 18001 and AS/NZS 4801 (AUS only).

#### **Stakeholders**

The Company operates on the basis of communicating openly with all of its stakeholders whether they are shareholders, government departments or agencies, the local community, employees, customers or suppliers. Honesty and integrity in communications is regarded as the key pillar in establishing the Company's reputation as a credible and trustworthy member of the international business community.

# **Employees**

Date approved: 25 Feb 19

We are guided by our aim to deliver a competitive and fair employment environment and the opportunity to develop and advance individuals subject to personal performance and business opportunity. We do not discriminate in any way with respect to employment or advancement and encourage all employees to work collaboratively in pursuing the Company's objectives.



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# **Diversity**

We are committed to diversity in the workplace that reflects the local communities within which we operate and a work environment that ensures equal opportunity for all. We encourage different approaches and ideas from different backgrounds and experience to bring fresh thinking to our organisation.

#### **Customers**

Our business and livelihood depend upon our customers. Every employee contributes to our relationships with our customers and is personally responsible for ensuring that any contact with our customers reflects professionalism, efficiency and honesty. We constantly strive to provide high quality service and products.

## **Suppliers and Contractors**

We consider our suppliers and contractors as our partners and work with them to help us achieve our quality aspirations in the delivery of our products and services. As such, we establish long term relationships with suppliers who actively assist the Company to achieve its commercial objectives.

# **Community**

We are committed to being a responsible corporate citizen through support for appropriate non-political and non-sectarian organisations. Where appropriate we actively contribute to the local communities we operate within through providing time and resources to community projects.

We recognise that our business activities have varying direct and indirect impacts on the societies in which we operate. We endeavour to manage these in a responsible manner, believing that sound and appropriate performance in this area is critical to business success.

The Chief Executive Officers are responsible for ensuring CtL's continued commitment to continuously improving our social responsibility program and encouraging our business partners to implement corporate social responsibilities appropriate to their businesses.

Marc Lichtenstein Joint CEO

Tom Ogonek Joint CEO

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