

Document Management System

Global CtL Environment Policy

Policy Statement

Close the Loop (CtL) specialises in the post-consumer recovery and recycling of imaging consumables. CtL maintains a zero waste to landfill policy with a focus on providing the best quality output streams and working towards achieving a sustainable circular economy while maintaining best practice for responsible environmental management and the health and safety of employees and stakeholders.

CtL uses proprietary and innovative materials separation processes with all items recycled with zero waste to landfill. CtL is committed to managing our operations in an environmentally responsible way and the prevention of pollution and harm to the environment.

Objectives

CtL commits to:

- Ensuring that the framework and commitment for setting and reviewing environmental objectives and targets are realised.
- Demonstrate, via external verification, compliance with external industry standards applicable to each operating region. Standards include ISO 9001, ISO 14001, ISO 45001 and R2 (US and Australia only).
- Maintain a management system consistent with the requirements of the International Standard for Environment Management Systems (ISO 14001) with a key focus on continual improvement.
- Ensure that hazardous and other focus materials are identified and managed locally adhering to the Basel Convention to protect human health and ensuring environmentally sound management of product(s).
- Provide a recycling solution for an industry where previously nearly all waste went to landfill or developing countries and by doing so, our innovative approach is paying dividends for the environment, human health, and business.
- Reduce energy and water consumption and waste produced by our process where economically viable.
- Strive to comply with eStewards standards globally. This is managed and monitored internally.

Responsibilities

Top Management is accountable for implementing this policy in their area of responsibility.

Top Management is responsible for:

- Ensuring operations are conducted in compliance with relevant local environment legislation, regulations, licences, and other requirements.
- Identify and manage environmental risks and opportunities to prevent pollution and achieve continual improvement of environmental performance through best practice.
- Ensure that our people, contractors, and local community are aware of this policy (www.closetheloopworldwide.com).
- Communicate openly and constructively with our people and the wider community.
- Educate our people and contractors, ensuring the requirements for environmental responsibility are integrated into work practices, training and decision making, and is included in performance assessment.



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Application of the Policy

This Policy is applicable to all CtL operations and functions, including where employees are required to work off site.

Marc Lichtenstein Joint CEO Tom Ogonek Joint CEO