

Waste Management

Group Policy Statement



**DANX
Carousel**



About the DANX Carousel Group

The DANX Carousel Group of companies (hereafter “The Group”, “We”, “Our”) is a time critical service logistics specialist with strong positions in the UK, Ireland, BeNeLux, DACH, Iberia, Nordics, Baltics and Poland.

The Group is the comprehensive partner for logistics and supply chain services such as time-critical spare parts distribution, warehousing, final mile, linehaul, battery logistics, customs clearance, and more. The Group consists of DANX, DANX ILS, UT, TBS, Fomab, TLS Group, Carousel, Alltrans, Logik International Logistics and LPR.

Our values encompass our commitment to Caring, Learning and Ownership and these are embedded in our everyday work.

We support



10 principles of the UN GLOBAL COMPACT

HUMAN RIGHTS

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

LABOUR

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

ENVIRONMENT

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

ANTI-CORRUPTION

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

International Labour Organisation

ILO Declaration of Fundamental Principles and Rights at Work:

- (1) Freedom of association and the effective recognition of the right to collective bargaining;
- (2) The elimination of all forms of forced or compulsory labour;
- (3) The effective abolition of child labour; and
- (4) The elimination of discrimination in respect of employment and occupation.

SUSTAINABLE DEVELOPMENT GOALS



Goal 5 – Gender equality



Goal 8 – Decent Work and Economic Growth



Goal 13 – Climate Action

1. Scope of Policy

The scope of the **Waste Management policy** applies to all stakeholder groups including both upstream and downstream within the value chain, including management; employees; contract workers; suppliers and partners of all entities in the Group as well as for subsidiary companies owned and operated by the DANX Carousel Group across our geographies and countries and the wider communities in which it operates and through which material impacts, risks or opportunities relate. The DANX Carousel Group of companies is committed to open and unbiased dialogue with all our stakeholders on Waste Management.

The content outlines the DanxCarousel Groups position on respect of Waste Management, in line with the objectives in regulatory governance, reporting and transparency in-line with national and international law; Principles 6, 7 and 8. of the UN guidelines on business conduct. The content of this policy outlines; how to report, infringements and consequences of such breaches; our commitment to training and awareness of its content and appropriate behaviours when it comes to this policy, along with the Groups transparency of reporting and monitoring of this policy.

We expect our suppliers and contractors to share our regard and respect of this policy, and this is reflected in our Supplier Code of Conduct which can be found on our websites: <https://www.danxcarousel.com>, Nordics: <https://www.danx.com/> and for Western Europe: <https://www.carousel.eu/en/>

2. Our Commitment

The DANX Carousel Group is committed to meeting its responsibility and to gain insights into its stakeholders with respect to Waste Management as defined by the UN Guiding Principles 7, 8 and 9; and our commitment to the SDG 13, the European Waste Catalogue (EWC) and ADR regulations.

3. Aims of the Waste Management Policy

The aim of this policy is to ensure that The Group has supporting structures and procedures in place that measure and make corrective actions to limit the amounts of materials used in our cargo handling and commercial operations that are discarded year over year, promote recycling, and that any hazardous and/or regulated waste traffic is handled safely and legally per regulations in the shipping, receiving and transit countries involved.

This **waste management policy** is applicable to the following types of waste:

- Consumable packaging from The Group's cargo handling operations; wooden & plastic pallets, plastic protective packaging, plastic sheeting, cardboard etc.
- Customers' recyclable materials as part of after-market and service logistics activities, including but not limited to; used oils, lubricants, cleaning agents/materials, protective equipment/clothing, decommissioned components and parts, and lithium/ion batteries and packaging.
- Parts, equipment and waste products classified as hazardous waste per the European Waste Catalogue (EWC) regulations being transported and handled and disposed of for customers as part of the Group's commercial logistics services.
- General rubbish/waste from office and warehouse operations including but not limited to consumables, such as paper, plastic, wood and food, that can be recycled. This is reflected in local procedures for the management of such waste along with our ISO14001 standards, across the business.

The above-mentioned materials will be sorted, measured and monitored, in collaboration with waste removal services for the purpose of improving the rate of recycling and to decrease the amount of waste being sent to landfills or incinerators.

The Group will maintain all required legal certifications, training, emergency protocols and facility permits, as well as the correct infrastructure for managing waste at its facilities. This ensures compliance with disposal regulations across regions and the management of hazardous and/or harmful substances and/or products.

4. Monitoring Breaches

The Group is committed to identifying potential and actual adverse impacts that this policy and our conduct of business may cause or contribute to, and strives to recognise and record through targets, to prevent such impacts, and mitigate or remedy using action plans.

5. Consequences of Breach and Infringements

Whilst we appreciate that there may be some differences in applicable national laws versus international laws we apply our policies across all relevant stakeholders and we will adhere to the national and international laws as a minimum and respect the guiding principles of the UN Global compact, ILO and any other interested regulatory bodies that are applicable to the work that we carry out.

If we receive any reported infringements, we will act appropriately for clarification and will take appropriate corrective actions.

If we suspect that anyone working for or on behalf of the DANX Carousel Group has committed a breach of this policy, an investigation will be carried out and, in line with our disciplinary procedure where appropriate, action may be taken which may result in dismissal, or in the case of a supplier/partner action up to and including termination of contract. In some circumstances, under relevant law, the Group may be legally required to share details with such authorities and we will comply with such requirements at all times.

The outlined topics within this policy are significant for the way we commit to, and govern our conduct throughout our business.

6. Raising concerns

Any employee with concerns may raise these through our employee mechanisms for raising workplace-related grievances. We encourage employees who have a concern to talk in the first instance to their line manager, or alternatively to raise their concern with their HR or compliance representatives. If neither of these options is possible, the DANX Carousel Group's whistle blower system enables all stakeholders (internal and external) to speak up about violations in relation to this policy without fear of retaliation.

We will support all who report violations as well as those who request assistance or have concerns. If any concerns or illegal or unethical business behaviour is suspected or detected, you can report it to us via our whistle-blower system. Our whistle blower system Safe2Whistle can be accessed here:

<https://report.whistleb.com/en/danxcarouselgroup>. It is operated across the business by an independent third party (Bech.Brunn) appointed by the DANX Carousel Group. All issues raised through the Whistle Blower system are monitored by the third party and the Group whistle blower team. Reporting is carried out confidentially, and stakeholders can choose to share their concerns anonymously.

7. Training, Communication, Awareness

The Group is committed to raise awareness and knowledge of this policy amongst its' stakeholders, by providing specific regulatory training where applicable to our operations, along with awareness through training and communication on related matters within this policy.

Training, communication, and awareness of policy is a fundamental requirement of our business. We advocate transparency of all policies and where appropriate training takes place either at point of Induction of employees, or as part of an annual commitment to ensure that policy is communicated and awareness refreshed effectively.

All stakeholder policies are available on our intranet and websites.

8. Stakeholder Engagement

We acknowledge our business is operated as part of an extended community of stakeholders, and as part of our regular dialogue with them we respect their view and expectations regarding this policy as outlined in the Employee and Supplier Codes of Conduct.

9. Reporting and monitoring

We communicate and report on our Waste Management and related commitments of training and awareness as applicable to our stakeholders and as part of our annual sustainability reporting.

10. Culture of continuous improvement

As part of our culture of continuous improvement we regularly evaluate against targets and review how we can best improve and strengthen our approach to addressing our policies supported through our values of Caring, Learning and Ownership.

11. Accountability for this policy

Accountability for the implementation of this policy is overseen by the Groups Executive and Senior Leadership team, to ensure that our business clearly understands the responsibility to respect Waste Management and its day-to-day implementation to stakeholders.

12. Adoption of Policy

The Danx Carousel Group's Waste Management Policy statement is adopted by the Executive Leadership team of management on **1st January, 2025**. This policy is reviewed annually for compliance content or as required if changes to legislation apply sooner.

Review and revision of Policy

This policy will be reviewed and revised annually for compliance to the policy content or as required if changes to legislation apply sooner.

Contact

If you have any questions relating to the content of this policy please direct them to groupcompliance@danxcarousel.com

[DanxCarousel.com](https://danxcarousel.com) | [Danx.com](https://danx.com) | [Carousel.eu](https://carousel.eu)