

Ethics Policy

1. Purpose

This Ethics Policy sets out the standards of professional conduct expected from all employees, contractors, directors, and representatives of the Company. It ensures that our operations within tyre supply, distribution, mobile fitting, and waste management are carried out responsibly, lawfully, and with integrity.

2. Scope

This policy applies to:

- All employees, including temporary and agency staff
- Contractors, subcontractors, and mobile fitters
- Directors and senior management
- Any third parties acting on behalf of the Company

3. Core Ethical Principles

3.1 Integrity and Honesty

We conduct all business activities truthfully and transparently. Employees must:

- Provide accurate information to customers
- Avoid misleading claims about products, performance, or pricing
- Declare conflicts of interest immediately

3.2 Compliance with Laws and Regulations

We comply with all applicable UK laws, including:

- Bribery Act 2010
- Modern Slavery Act 2015
- UK GDPR & Data Protection Act 2018
- Health and Safety at Work Act 1974
- Environmental Protection Act 1990
- Waste (England and Wales) Regulations 2011

We maintain appropriate documentation to demonstrate compliance.

3.3 Anti-Bribery and Corruption

The Company has **zero tolerance** for bribery, corruption, or improper influence. Employees must not:

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- Offer, give, request, or accept bribes
- Provide gifts or hospitality intended to influence business decisions
- Facilitate payments or kickbacks

All business decisions must be based on merit, quality, and commercial fairness.

3.4 Fair Competition and Commercial Conduct

We compete ethically and fairly. This includes:

- Avoiding anti-competitive behaviour
- Respecting confidential commercial information
- Ensuring pricing and procurement practices are transparent and lawful

4. Ethical Responsibilities in Tyre Supply Operations

4.1 Product Quality and Safety

We commit to:

- Supplying tyres that meet legal standards and manufacturer specifications
- Ensuring correct storage, handling, and rotation of stock
- Providing accurate technical advice to customers

Counterfeit or unsafe tyres must never be purchased, sold, or fitted.

4.2 Environmental Responsibility

We recognise our duty to minimise environmental impact. We ensure:

- Proper segregation, storage, and disposal of waste tyres
- Use of licensed waste carriers and authorised treatment facilities
- Compliance with duty-of-care documentation (waste transfer notes, consignment notes)
- Reduction of emissions and fuel use in logistics and mobile fitting operations

4.3 Ethical Supply Chain Management

We expect suppliers to uphold similar ethical standards. We conduct due diligence to ensure:

- No involvement in forced labour or modern slavery
- Fair working conditions
- Responsible sourcing of raw materials

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- Compliance with environmental and safety regulations

Suppliers failing to meet these standards may be removed from our approved list.

5. Respect in the Workplace

5.1 Equality, Diversity, and Inclusion

We promote a workplace free from discrimination. All employees must treat colleagues, customers, and partners with respect regardless of:

- Age
- Gender
- Race
- Religion
- Disability
- Sexual orientation
- Background

5.2 Health, Safety, and Welfare

We maintain safe working environments across depots, warehouses, and mobile fitting operations. This includes:

- Proper use of lifting equipment and tyre-handling tools
- Safe working practices on customer sites and roadside locations
- Mandatory use of PPE
- Reporting hazards, incidents, and near misses

6. Data Protection and Confidentiality

We handle personal and commercial data responsibly. Employees must:

- Protect customer and supplier information
- Use data only for legitimate business purposes
- Follow UK GDPR principles
- Report data breaches immediately

7. Conflicts of Interest

Employees must avoid situations where personal interests conflict with business duties. Examples include:

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- Undisclosed relationships with suppliers
- Personal gain from tyre disposal contracts
- Accepting gifts that influence decision-making

Conflicts must be declared to management.

8. Reporting Concerns

We encourage open reporting of unethical behaviour. Employees may report concerns to:

- Line managers
- HR
- Directors
- The Company's confidential reporting channel

Retaliation against whistleblowers is strictly prohibited.

9. Enforcement

Breaches of this policy may result in:

- Disciplinary action
- Termination of employment or contracts
- Reporting to regulatory authorities
- Removal of suppliers from approved lists

10. Review

This policy is reviewed annually or when legislation or operational practices change.