



Barloworld Waste Management Policy

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Version	V 1.2	Contact	Kavendrin Naidoo	Phone	011 445 1174

PREAMBLE	1
PURPOSE	2
SCOPE	2
REGULATORY BACKGROUND	2
POLICY STATEMENT	2
RELATED POLICIES	4
COMMUNICATION	4
ROLES AND RESPONSIBILITIES	4
RAISING CONCERNS AND SEEKING GUIDANCE	4
BREACH OF POLICY	5
DEVIATIONS FROM POLICY	5
DEFINITIONS	5
APPROVAL AND OWNERSHIP	5
REVISION HISTORY	5

PREAMBLE

Barloworld is an industrial processing, distribution and service company which distributes leading international brands. In our Original Equipment Manufacturers (OEM) businesses we provide integrated sales, rental, fleet management and product support through offering flexible, value adding, and innovative business solutions to our customers backed by leading global brands.

One of Barloworld’s core competencies is its ability to leverage systems and best practices across its chosen business segments. As an organisation we are committed to sustainable development, which remains a corporate priority.

Responsible waste management is a material element of Barloworld reducing its environmental impact and central to its strategic ambitions, sustainable value creation approach and making a world of difference to its stakeholders.

As a responsible corporate citizen Barloworld:

- Appreciates the importance of responsible waste management, recycling, reuse, recovery, extended lifecycle (rebuild and remanufacture), and responsible waste disposal
- Recognises irresponsible waste management practices are a threat to the environment as well as the health and safety of its employees, the communities it serves and operates in, and poses a serious threat to the ecology.
- Encourages all its stakeholders to consider positive steps they may take with regards to responsible and sustainable waste management
- Participates in its value-chain to promote responsible waste management and appropriate responses
- Invests in recycling, remanufacture and rebuild facilities that support internal waste management imperatives and broaden customer offerings
- Commits to handling waste, including hazardous waste, according to applicable local regulatory requirements and international standards
- Recognises that sustainable waste management practices provide opportunities for cost savings and support Shared Value creation
- Has clear accountability for waste stewardship with the group’s Board and Executive, as a part of good corporate governance
- Incorporates waste management and related considerations in its strategic framework, which is underpinned by sustainable development.

PURPOSE

As part of its business model, Barloworld strives to minimise the negative impacts of its operations on Natural Capital and the environment. Waste management considerations form an integral part of daily business activities, including risk management, strategic planning, capital and operational expenditure, investments and operating procedures.

The objective of this policy is to drive responsible waste stewardship within the Barloworld operating context and to outline the minimum expectations across Barloworld to minimise waste while enhancing responsible waste management and waste disposal practices within its direct operations.

SCOPE

The policy applies to all Barloworld employees, across all its operations and territories.

REGULATORY BACKGROUND

Across the various jurisdictions where Barloworld operates, waste management regulations are in place that serve to govern and regulate activities related to waste including management, handling and disposal.

At a minimum, we expect all Barloworld operations to comply with their relevant local legislative framework and regulations, including those related to waste.

Examples within the South African jurisdiction include, National Environmental Management Act (NEMA), supported specifically by the Waste Act.

POLICY STATEMENT

P1.	Commitment
	<ul style="list-style-type: none"> • Waste management is an integral part of management in the company and is recognised as one of the corporate priorities. • In all its divisions, Barloworld will publish divisional Waste Management Policies appropriate to the business of each division, subordinate to this company policy, which will, inter alia: <ul style="list-style-type: none"> ○ Establish clear accountability for waste management performance with divisional Executives and top management, as a part of good corporate governance ○ Require compliance with relevant waste management legislation, other standards and codes of practice to which the company subscribes

	<ul style="list-style-type: none"> ○ Where practicable, optimise responsible waste management, prioritizing waste minimisation through source reduction and selective purchasing, recycling, recovery and reuse, extended lifecycle (rebuild and remanufacture), and responsible waste disposal. ○ Ensure that waste management considerations form part of the company’s overall business and risk management processes ○ Ensure responsible waste management considerations, are incorporated into its facilities and maintenance cycles, its strategic plans as well as expansion projects and acquisitions ○ Promote waste management awareness within company operations ○ Require the maintenance of open dialogue with stakeholders, including customers and suppliers to promote environmental protection through responsible waste management practices ○ Develop contingency procedures to deal with unscheduled occurrences and community concerns. <ul style="list-style-type: none"> ● Environmental Management Systems implemented in the divisions will include aspects of waste management to guide environmental responsibility and accountability at all levels of management and continual improvement of environmental performance through self-assessment and auditing. ● Barloworld will continue to assess its physical, regulatory, reputational and financial risks associated with waste and, where practicable, adapt its operations, processes and procedures accordingly. It will also pursue relevant identified opportunities where practicable
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P2.	Guiding Principles
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	<ul style="list-style-type: none"> ● All operations shall comply with the following principles and initiatives: <ul style="list-style-type: none"> ○ Measurement and reporting of material environmental indicators including waste management ○ Appropriate targets are set and initiatives implemented once reliable baselines have been achieved for applicable indicators ○ Monitoring and reporting mechanisms track progress made against set targets. ○ Aspirational improvement targets set for responsible waste management practices. ● Barloworld is cognisant of its responsibility for all its products and services, raw material usage and management of waste products after use. Where practicable Barloworld will make sustainable use of renewable resources and, wherever practicable, use renewable or recyclable materials. In addition, the company will promote the efficient and optimal use of finite resources, thereby conserving such resources. The company will reduce and, where practicable eliminate, waste through appropriate and sustainable waste minimisation techniques. All waste will be handled and disposed of through legally compliant, safe and responsible methods. The management of waste by disposal to landfill will be used as a last resort, where alternatives are not practicably available. ● Waste management considerations will form part of assessments for significant new projects and of the planning phase for modifications to existing operations. ● Barloworld will strive to minimise the environmental, health and safety risks to employees and the communities in which the company operates through safe technologies, facilities and operating procedures. ● All operations will be prepared for emergencies. Barloworld divisions will strive to appropriately communicate with those affected by conditions caused by the company that endangers the environment or public health and safety.
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RELATED POLICIES

All operations within the Barloworld Group are expected to uphold the principles contained within this policy which is to be read in conjunction with the policies as detailed below:

Policy name	Purpose
Barloworld Worldwide Code of Conduct	To set out the Barloworld Values expected to be upheld by all Barloworld employees
Barloworld Climate Change	To set out the minimum required standards for understanding and limiting our contribution to Climate Change within the Barloworld operating context
Barloworld Environmental	To set out the minimum required standards for Environmental considerations within the Barloworld operating context
Barloworld Energy Efficiency Policy	To set out the minimum required standards for Energy related aspects within the Barloworld operating context
Barloworld Water Use and Management Policy	To set out the minimum required standards for responsible water stewardship and related aspects within the Barloworld operating context

COMMUNICATION

This policy should be communicated to all Barloworld employees, across all its operations and regions.

ROLES AND RESPONSIBILITIES

The Chief Executive Officer and Board of Directors in each division are the environmental champions and are responsible and accountable for waste management practices.

Divisional Executive management have the responsibility to ensure compliance with this policy and at their discretion to define the processes, procedures and other mechanisms by which the policy is implemented.

Implemented processes ensure that the Barloworld Group Chief Executive Officer and Board of Directors are fully informed about pertinent environmental issues, including waste management.

RAISING CONCERNS AND SEEKING GUIDANCE

If any person is seeking advice on aspects within this policy, they are encouraged to contact the Barloworld Group Sustainability Manager (sustainability@barloworld.com).

If any person becomes aware of a circumstance or action that violates or appears to violate this policy, they are encouraged to contact their manager, or alternatively the Barloworld Ethics Line at www.tip-offs.com.

The Barloworld Ethics Line is an independent and confidential system for reporting allegations of unethical behaviour, illegal actions, or actions that violate the Barloworld Worldwide Code of Conduct.

The Barloworld Global Whistleblowing Policy applies to the use of the Barloworld Ethics Line and it contains the contact details pertaining to each company, division, or business unit.

Barloworld is committed to ensuring that no employee suffers any occupational detriment as a result of reporting a genuine concern in good faith.

BREACH OF POLICY

Barloworld has established clear reporting structures in all divisions that culminate in compliance with relevant legislation and adherence to this policy. Material waste aspects impacting the environment and/or health and safety of employees or communities are reportable to the respective divisional Executive Committee and other relevant divisional governance structure/s and thereafter to the group Executive Committee, and to the group Social, Ethics and Transformation Committee, a sub-committee to the Board of Directors.

It is the responsibility of Chief Executive Officer and Board of Directors in each division to comply with this policy and failure to do so by any employee could amount to disciplinary action and a material breach of the contract of employment.

DEVIATIONS FROM POLICY

It is the responsibility of divisional Executive management to ensure that this policy is adopted and approved by an appropriate divisional Executive Committee.

Any deviations to this Barloworld group policy that amend the meaning or raise the minimum standard of the group policy requirements must be tabled, approved and recorded at an appropriate divisional Executive meeting, and thereafter tabled, approved and recorded at the Group Social, Ethics and Transformation Committee.

Language translations of Barloworld policies must be conducted or checked by a professional language translator to avoid translation errors that may change the meaning of the policy requirements.

DEFINITIONS

D1.	Barloworld
	Barloworld means Barloworld Limited and its subsidiaries, divisions, and business units in all countries in which it does business, or any individual subsidiary in its own capacity. It does not include joint ventures, other than those where Barloworld exercises management control, nor does it include investments where Barloworld owns less than 50%.

APPROVAL AND OWNERSHIP

Owner	Title	Date
Kavendrin Naidoo	Group Sustainability Manager	22 April 2021
Approved By		Date
Group Executive Committee		23 April 2021
Social, Ethics and Transformation Committee		19 May 2021

REVISION HISTORY

Version	Revision Date	Description	Next review Date
V1.0	25 September 2012	Policy was originally published in May 2012 and was approved by the Barloworld Group Risk and Sustainability Committee	
V1.1	14 May 2019	Last review and approval date by the Group Risk and Sustainability Committee	May 2021
V1.2	19 May 2021	Last review and approval by the Group Social, Ethics and Transformation Committee	May 2023