

1. INTRODUCTION AND PURPOSE

1.1 Our Commitment

Greensley Limited is committed to conducting business with the highest standards of integrity, transparency, and ethical behavior. As international traders and service providers for the raw materials and recycling industries, we recognize our responsibility to operate legally, sustainably, and ethically across all markets in which we operate.

1.2 Scope and Application

This Code of Conduct applies to all directors, employees, contractors, agents, and business partners of Greensley Limited worldwide. All persons acting on behalf of Greensley Limited must familiarize themselves with and adhere to this Code.

1.3 Our Values

We don't cheat, we don't lie, we don't overstep, we don't mislead, we don't do noise marketing. We don't live a million miles away, we don't daydream, we don't do anything illegal. These principles guide every decision we make.

2. LEGAL COMPLIANCE AND INTEGRITY

2.1 Compliance with Laws and Regulations

All Greensley Limited personnel must:

Comply with all applicable laws, regulations, and industry standards in Ireland and in every jurisdiction where we conduct business

Ensure full compliance with international trade laws, import/export regulations, and customs requirements

Adhere to environmental regulations governing waste management, recycling, and materials handling

Respect intellectual property rights and maintain proper licensing for all operations

Comply with data protection regulations including GDPR and equivalent international standards

2.2 Anti-Corruption and Anti-Bribery

Greensley Limited has zero tolerance for corruption and bribery. We strictly prohibit:

Offering, promising, giving, or accepting bribes, kickbacks, or improper payments to or from any person or entity

Facilitating payments intended to expedite routine governmental actions, except where legally permissible and properly documented

Providing gifts, entertainment, or hospitality that could improperly influence business decisions

Engaging in any form of commercial bribery with private sector partners

All dealings with government officials, customs authorities, and regulatory bodies must be transparent and properly documented.

2.3 Anti-Money Laundering

We are committed to preventing money laundering and terrorist financing. All personnel must:

Conduct appropriate due diligence on customers, suppliers, and business partners

Verify the identity and legitimacy of all parties in business transactions

Report suspicious transactions or activities to management immediately

Maintain accurate records of all financial transactions

Cooperate fully with law enforcement and regulatory authorities

3. BUSINESS PRACTICES

3.1 Fair Dealing and Honest Communication

We conduct business fairly and transparently. This means:

Providing accurate, complete, and timely information to customers, suppliers, and partners

Honoring all contractual commitments and business agreements

Avoiding misleading statements, exaggerations, or omissions in marketing and communications

Competing fairly and ethically in the marketplace

Respecting confidential and proprietary information

3.2 Materials Qualification and Quality

As experts in materials assessment, we commit to:

Conducting thorough and honest quality assessments of all materials

Providing accurate specifications and certifications

Disclosing any known defects, contamination, or quality issues

Refusing to misrepresent the origin, composition, or quality of materials

Maintaining proper documentation and chain of custody records

3.3 International Trade and Customs

Given our global operations, we must:

Provide accurate information on customs declarations and shipping documents

Properly classify goods according to harmonized tariff schedules

Comply with sanctions, embargoes, and export control regulations

Maintain required import/export licenses and permits

Report all cross-border transactions accurately and completely

4. ENVIRONMENTAL RESPONSIBILITY

4.1 Sustainable Recycling Practices

As leaders in the recycling industry, we are committed to:

Finding optimal recycling solutions that minimize environmental impact

Promoting circular economy principles in all our activities

Ensuring that materials are processed at properly licensed and compliant facilities

Preventing illegal waste trafficking and ensuring proper waste classification

Supporting innovation in recycling technologies and methods

4.2 Environmental Compliance

We will:

Comply with all environmental laws, including Basel Convention requirements for transboundary waste movements

Conduct environmental due diligence on all suppliers and recycling facilities

Monitor and reduce the environmental footprint of our operations

Report environmental incidents promptly and implement corrective actions

Promote environmental best practices throughout our supply chain

5. HUMAN RIGHTS AND LABOR STANDARDS

5.1 Respect for Human Rights

Greensley Limited respects internationally recognized human rights. We commit to:

Supporting the elimination of forced labor, child labor, and human trafficking in all our operations and supply chains

Promoting fair wages, reasonable working hours, and safe working conditions

Respecting freedom of association and collective bargaining rights

Prohibiting discrimination based on race, color, religion, gender, age, disability, sexual orientation, or any other protected characteristic

Providing equal opportunities for employment, development, and advancement

5.2 Health and Safety

We prioritize the health and safety of all personnel by:

Maintaining safe working conditions and preventing workplace injuries

Providing appropriate training on health and safety risks associated with materials handling

Ensuring proper personal protective equipment is available and used

Conducting risk assessments for all materials and operations

Investigating and addressing all safety incidents promptly

6. CONFLICTS OF INTEREST

6.1 Identifying and Managing Conflicts

Personnel must avoid situations where personal interests conflict or appear

to conflict with the interests of Greensley Limited. This includes:

Financial interests in competitors, customers, or suppliers
Personal relationships that could influence business decisions
Outside employment or business activities that compete with company interests
Misuse of company assets or information for personal gain
All actual or potential conflicts of interest must be disclosed promptly to management.

6.2 Corporate Opportunities

Personnel must not:

Exploit business opportunities discovered through their position for personal benefit
Use company property, information, or position for personal gain
Compete with the company's business activities

7. CONFIDENTIALITY AND DATA PROTECTION

7.1 Confidential Information

We protect confidential information belonging to Greensley Limited, our customers, suppliers, and partners. Personnel must:
Handle confidential information responsibly and limit access to authorized individuals

Not disclose confidential information externally without proper authorization

Maintain confidentiality even after employment or engagement ends

Use confidential information only for legitimate business purposes

7.2 Data Protection and Privacy

We respect the privacy rights of individuals and comply with data protection laws. This requires:

Collecting and processing personal data only for legitimate business purposes

Implementing appropriate security measures to protect personal data

Providing transparency about how personal data is used

Respecting data subject rights under applicable privacy laws

Reporting data breaches promptly according to legal requirements

8. FINANCIAL INTEGRITY AND RECORD KEEPING

8.1 Accurate Books and Records

We maintain accurate, complete, and transparent financial records. All personnel must:

Record all transactions accurately and in a timely manner

Ensure that all documentation supports the recorded transactions

Never create false or misleading entries in company books or records

Maintain proper documentation for all international transactions

Cooperate fully with internal and external audits

8.2 Internal Controls

We implement and maintain effective internal controls to:

Prevent fraud, theft, and misappropriation of assets

Ensure compliance with applicable laws and company policies

Provide reasonable assurance regarding the reliability of financial reporting

Safeguard company assets and resources

9. RESPONSIBLE SUPPLY CHAIN MANAGEMENT

9.1 Supplier and Partner Standards

We expect our suppliers, contractors, and business partners to:

Comply with applicable laws and regulations

Adhere to ethical business practices consistent with this Code

Respect human rights and provide safe working conditions

Operate in an environmentally responsible manner

Maintain transparency in their operations

9.2 Due Diligence

Before engaging suppliers or partners, we conduct appropriate due diligence to:

Verify legal compliance and proper licensing

Assess environmental and social risks

Evaluate financial stability and business reputation

Ensure alignment with our ethical standards

Monitor ongoing compliance throughout the relationship

10. SPEAKING UP AND REPORTING CONCERNS

10.1 Duty to Report

All personnel have a responsibility to report suspected violations of this Code, company policies, or applicable laws. We encourage open communication and provide multiple channels for reporting concerns.

10.2 Non-Retaliation

Greensley Limited strictly prohibits retaliation against anyone who:

Reports a suspected violation in good faith

Participates in an investigation

Refuses to engage in conduct that would violate this Code or applicable laws

Retaliation is itself a violation of this Code and will result in disciplinary action.

10.3 Reporting Channels

Concerns may be reported through the following channels:

Direct supervisor or manager

Human Resources

Company Directors

Email: info@greensley.eu

Phone: +353 1 9609990

Reports may be made confidentially or anonymously where permitted by law.

11. INVESTIGATIONS AND DISCIPLINARY ACTION

11.1 Investigation Process

All reported concerns will be:

Taken seriously and investigated promptly

Handled confidentially to the extent possible

Conducted fairly and objectively

Documented appropriately

11.2 Consequences of Violations

Violations of this Code may result in:

Disciplinary action up to and including termination of employment or engagement

Legal action and prosecution where violations constitute criminal conduct

Termination of business relationships with suppliers or partners

Reporting to relevant authorities as required by law

12. CONTINUOUS IMPROVEMENT AND TRAINING

12.1 Training and Education

Greensley Limited provides regular training to ensure personnel:

Understand the requirements of this Code

Stay current with evolving laws and regulations

Recognize ethical dilemmas and know how to respond

Understand their reporting obligations

12.2 Code Review and Updates

This Code will be reviewed regularly and updated as needed to:

Reflect changes in laws and regulations

Address emerging risks and challenges

Incorporate lessons learned from incidents or near misses

Maintain alignment with industry best practices

13. LEADERSHIP RESPONSIBILITY

13.1 Tone from the Top

The Directors and senior management of Greensley Limited are committed to:

Leading by example and demonstrating ethical behavior

Fostering a culture of integrity and compliance

Providing resources necessary for compliance

Holding themselves and others accountable

13.2 Management Obligations

Managers at all levels must:

Ensure their teams understand and comply with this Code

Create an environment where concerns can be raised without fear

Address potential violations promptly and appropriately

Model ethical decision-making in all situations

14. CONCLUSION

This Code of Conduct reflects our commitment to operating with integrity in everything we do. It provides guidance for ethical decision-making and sets clear expectations for behavior. When faced with uncertainty, all personnel should ask themselves:

Is this action legal?

Is it consistent with this Code and company values?

Would I be comfortable if this action became public?

Does it reflect well on Greensley Limited?

If the answer to any of these questions is no, or if you are uncertain, seek guidance before proceeding.

By upholding these standards, we protect our reputation, strengthen our relationships, and ensure the long-term success of Greensley Limited.