



Corporate social responsibility company policy

Updated Feb 2024

Policy brief & purpose

Our Corporate Social Responsibility (CSR) company policy refers to our responsibility toward our environment. Our company's existence is part of a bigger system of people, values, other organizations and nature. Our CSR company policy outlines our efforts to give back to the wider community.

Scope

This policy applies to our company and its subsidiaries as well as our suppliers and partners.

Policy elements

We want to be a responsible business that meets the highest standards of ethics and professionalism. Our company's social responsibility falls under two categories: **compliance** and **proactiveness**. Compliance refers to our company's commitment to legality and willingness to observe community values. Proactiveness is every initiative to promote human rights, help communities and protect our natural environment.

Compliance

Legality

Our company will:

- Respect the law
- Honor its internal policies
- Ensure that all its business operations are legitimate
- Keep every partnership and collaboration open and transparent

Business ethics

We'll always conduct business with integrity and respect to human rights. We'll promote:

- Safety and fair dealing
- Respect toward the consumer

TCT – SUSTAINABLE RUBBER PRODUCTS

TCT Inc 874 Old Albany Shaker Road, Latham, New York, 12110 USA,

TCT Limited, Registered in Scotland no. SC627134. Castleblair Works, Inglis Lane, Dunfermline, Fife, KY129DP, SCOTLAND.

TCT Limited (the "Company") is a market leader in designing, marketing and selling products from recycled materials. Any interaction, contract and/or order with the Company shall be done on our standard terms and conditions (the "Conditions") and may be supplemented, where appropriate, with such agreement as may be negotiated between the parties. You agree to be bound by these Conditions to the exclusion of all other terms and conditions (including any terms or conditions which you purport to apply under any purchase order, confirmation of order, specification or other document). A copy of the Company's current Conditions is available to download at www.tire-conversion.com



- Anti-bribery and anti-corruption practices

Protecting the environment

TCT was set up with a core focus to build sustainable recycled rubber products. Protecting the natural environment and helping to reduce climate change are at the heart of this focus. Achieving greater sustainability is delivered through a number of areas.

CO2 equivalent reductions

- The TCT-Europe Polish manufacturing facility is currently installing a 1MW ground based solar PV system to generate 1/3 of its electricity meaning the Polish power is equivalent to the UK grid.
- TCT-Europe encourages all staff to conduct meetings via Zoom where possible to reduce unnecessary travel and to travel by train rather than fly for national journeys.
- The key CO2 equivalent savings come from our products. In 2023 TCT-Europe had an independent report run by Strathclyde university comparing our recycled tyre rubber products to an equivalent virgin synthetic rubber (EPDM) product by weight. The recycled tyre rubber products ranked better on 13 out of 16 of the key environmental metrics and had a significantly lower CO2 equivalent footprint than the virgin EPDM.
- <https://www.linkedin.com/feed/update/urn:li:activity:7105136364249063424/>
- TCT-Europe was selected to take part in the Impact training on CO2 emissions from our products and will have access to the tools and databases that form part of this until mid 2024. The company will be using this resource to compare our recycled rubber products against a range of other materials including concrete, breeze blocks, metal and other plastics.

Removing waste tyres and microplastics from the environment

- According to ETRA there are over 3,900,000 tons of tyres removed from cars, lorries, agricultural and other vehicles in the EU-27 Member States which are currently classified as waste. In recent years there has been a significant improvement in the recycling of 'End of Life' Tyres in the EU. Now, less than 9% are sent to landfills, 17% are reused/exported/re-tread, 38% are recycled, and another 36% are used for energy production. Of those tyres that are recycled 63% are channelled into granulation/powders, for use as a base material for new products. TCT exclusively uses this material to redesign products thereby reducing the number of waste tyres in dumps and removing microplastics from the wider environment.

End of life of products

Another factor in sustainability is the end of life of products. TCT are designing units that can last for years outside. As with most plastics though, the material will weaken each time products are taken back

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to recycle. In the case of recycled rubber products, the crumb is combined with polyurethane binders and eventually these build up and the crumb can no longer be effectively recycled. Products can be recycled 3-6 times at which point TCT will send the units out to be recycled into more permanent structures such as roads or concrete. Rubber is increasingly used in these structures as it adds key properties such as a reduction in stopping distance on road surfaces.

Disposal of chemicals in manufacturing

Keeping our environment clean and unpolluted is a benefit to all. We'll always follow best practices when disposing garbage and using chemical substances.

Recycling

The TCT-Europe Polish facility uses recycled pallets for all out deliveries and recycled paper and cardboard in the packing of our units.

Protecting people

We'll ensure that we:

- Don't risk the health and safety of our employees and community.
- Support diversity and inclusion. At TCT 50% of our top management are woman and the majority of the workforce in our manufacturing facilities come from disadvantaged communities.

Human rights

Our company is dedicated to protecting human rights. We are a committed equal opportunity employer and will abide by all fair labor practices. We'll ensure that our activities do not directly or indirectly violate human rights in any country.

Proactiveness

Volunteering

Our company encourages our employees to volunteer. They can volunteer through programs organized internally or externally.

Supporting the community

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Our company has a policy to support young people from our community. Our policy is to work with universities where we can provide internships including current work with Southampton University in the UK. Our Head of Design was initially recruited as an Intern working for TCT during his university program.

Learning

- We actively invest in R&D. In 2023 around 50% of the company's resources were invested in new R&D projects including work with a range of partners, testing houses and suppliers to look at areas including barrier tapes for PVC roofs and use of graphene to strengthen our products.
- The ongoing R&D involved in the re-design of virgin synthetic rubber, plastic and metal products to be made from a recycled material is at the heart of what we do.
- TCT is committed to the United Nations Global Compact. We'll readily act to promote our identity as a socially aware and responsible business. Management must communicate this policy on all levels. Managers are also responsible for resolving any CSR issues
- In the UK TCT also looks to adhere to the Scottish Policy Procurement Notes SPPN for products sold to government. SPPN upholds high standards with respect to Climate Change and the Environment.
- In Europe the company is working with key environmental bodies including Scottish Enterprise, Zero Waste Scotland and the European Tyre Recycling Association ETRA to better understand the key environmental developments and requirements of our specific industry and their impact on the wider communities we serve.

Further reading:

- [United Nations Global Compact](#)

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