

CORPORATE SOCIAL RESPONSIBILITY POLICY

Our Commitment to Sustainable Business

CODE OF BUSINESS ETHICS

This code applies to all of the operations of CarryaRound Ltd and sets out the minimum standards which CarryaRound Ltd expects from staff in their internal and external dealings with colleagues, customers, stakeholders and third parties.

1.1 Basic Standards of Conduct

- (a) We will conduct every aspect of our business with honesty, integrity and openness, respecting human rights and the interests of our employees, customers and third parties.
- (b) We will respect the legitimate interests of third parties with whom we have dealings in the course of our business.
- (c) We will maintain the highest standards of integrity – for example, we will not promise more than we can reasonably deliver or make commitments we cannot or do not intend to keep.

1.2 Employees

CarryaRound Ltd

- (a) is committed to creating and maintaining a safe and healthy working environment for its employees.
- (b) will strive to create a workplace in which there is mutual trust and respect and where every person feels responsible for the performance and reputation of our company.
- (c) will respect the individual and each other's rights, customs and traditions including the right to freedom of association and the right to decide whether or not to join a trade union and will negotiate in good faith with the properly elected representatives of its employees.
- (d) will work towards achieving a diverse workforce, recruiting, employing and promoting employees only on the basis of objective criteria and the qualifications and abilities needed for the job to be performed.
- (e) will maintain good communications with employees through our information and consultation procedures.
- (f) will assist employees in realising their potential.

1.3 Customers

- (a) CarryaRound Ltd is committed to providing value for money, high quality, consistent and reliable services to its customers.

1.4 Shareholders

- (a) CarryaRound Ltd will conduct its operations in accordance with the principles of good corporate governance.
- (b) We will provide timely, regular and reliable information on the business to all our shareholders.

1.5 Business Partners and Stakeholders

- (a) We aim to develop strong relationships with our suppliers, stakeholders and others with whom we have dealings, based on mutual trust, understanding and respect.
- (b) In those dealings, we expect our partners to adhere to business principles consistent with our own.

- (c) CarryaRound Ltd companies will conduct their operations in accordance with the principles of fair competition and applicable regulations.

1.6 Compliance with Law

- (a) All members of the company will comply with the laws and regulations applicable wherever they do business. Appropriate training will be provided for employees as necessary.

1.7 Business Integrity

- (a) No CarryaRound Ltd employee shall offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain and no employee may offer, give, seek or receive any gift or payment which is, or could be construed as, such. If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with his or her manager or Company Director.
- (b) CarryaRound Ltd accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.
- (c) No undisclosed or unrecorded account, fund or asset will be established or maintained.
- (d) CarryaRound Ltd will not facilitate, support, tolerate or condone any form of money laundering.

1.9 Community Involvement

- (a) CarryaRound Ltd strives to be a good corporate citizen and to fulfil our responsibilities to the societies and communities in which we operate.

1.10 Conflicts of interest and confidentiality

- (a) Whilst CarryaRound Ltd respects the privacy of its employees, all CarryaRound Ltd employees are expected to avoid personal activities and financial interests, which could conflict with their responsibilities to CarryaRound Ltd.
- (b) CarryaRound Ltd employees and consultants must not seek gain for themselves or others through misuse of their positions or company property.
- (c) All actual and potential conflicts (including those arising from the activities or interests of close relatives or partners) should be disclosed to and discussed with an employee's manager.
- (d) Information received by anyone in the course of his or her employment must not be used for personal gain or for any purpose other than that for which it was given.
- (e) Where information is confidential, that confidentiality must be respected.

EMPLOYMENT

2.0 Equal Opportunities and Diversity Policy

- a) The Board of Directors of CarryaRound Ltd is committed to equality of opportunity both in the provision of services to the public and as an employer. This policy sets out CarryaRound Ltd's commitment to treat equally and with fairness at all times its employees, customers, contractors and those who come into contact with the company.
- (b) We are committed to seeking continuous improvement and compliance with legislation based on the following principles.
- Everyone has the right to be treated with dignity and respect.
 - We will not discriminate on the grounds of race, gender, disability, nationality, religion, philosophical belief, political belief, age, sexual orientation, family status, trade union activity or any other factor.
 - We will adopt fair and inclusive practices throughout our operations and will seek to eliminate all prejudice, discrimination, bullying and harassment.

- All employees have a personal responsibility for the practical application of this policy in their day-to-day activities and must support the policy at all times.
 - Non-compliance with this policy will be treated seriously and will not be tolerated.
- (c) The Board of Directors of CarryaRound Ltd are required to ensure:
- They create a productive and safe working environment, promoting diversity and inclusion in their workforce;
 - They develop new practices, as appropriate, to ensure all employees, contractors and customers are treated fairly; and
 - They can demonstrate continuous improvement in practices to promote diversity and equal opportunities for all.

Legislation and Codes of Practice

We will comply with and exceed where possible, current national and international legislation and relevant codes of practice in the countries. Where we operate. We will monitor our compliance with this policy and the requirements of relevant underpinning legislation as appropriate.

Recruitment

All recruitment will be carried out with regard to fairness, equality and consistency for all candidates at all times. Recruitment practices will be inclusive and we will endeavour to ensure there are no barriers to employment of suitable candidates.

Staff Training

We will provide our staff with the necessary guidance and training to ensure the effective implementation of this policy and to ensure we are an inclusive employer and service provider.

Complaints

Any employee who feels that he or she has grounds for complaint in relation to bullying, discrimination, harassment or victimisation has the right to pursue the complaint through our grievance procedures. Customers who feel they have grounds for complaint may pursue these through our operating company customer complaints procedures. We will ensure our complaints/feedback procedures can be accessed and used by everyone.

Human Rights

CarryaRound Ltd supports the principles of the United Nations Universal Declaration of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. We will adhere to the following principles in respect of our staff.

- We will treat all employees fairly and honestly, regardless of where they work. All staff will have agreed terms and conditions in accordance with local law or practice and will be given appropriate job skills training.
- We will pay a fair wage reflecting local markets and conditions. We will always meet any national minimum wage.
- Working hours shall not be excessive. They shall comply with industry guidelines and national standards where they exist.

- We will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour.
- Employees have the rights of freedom of association and collective bargaining. We respect the right of our employees to choose whether or not to join a trade union without influence or interference from management. Furthermore we support the right of our employees to exercise that right through a secret ballot.
- We will negotiate in good faith with the properly elected representatives of our employees.
- We will abide by the non-discrimination laws in every country where we operate.
- We will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. We have disciplinary procedures for any member of staff whose conduct falls below the required standard.
- We have formal grievance procedures through which staff can raise personal and work-related issues.
- All staff will be given reasonable access to bathroom and rest facilities.

Data Protection

We will comply with the relevant principles governing data protection in each country in which we operate.

CUSTOMER AND COMMUNITY

Customers

CarryaRound Ltd wants to lead the way in transforming the way people transport beverages. By aiming for the top in everything that we do, and helping each other, we can deliver the highest levels of service, product quality and give greater customer & employee satisfaction. We will share all the success of our Company and reach our destination as the number one drinks carrier provider.

We will act in accordance with fair business, marketing and advertising practices and take all reasonable steps to ensure the safety of our services

- respect the human rights of our customers – our security and revenue protection arrangements are consistent with international standards for law enforcement
- provide transparent and effective procedures that address customer complaints and contribute to fair and timely resolution of disputes without undue cost or burden
- not make representations or omissions nor engage in any other practices that are deceptive, misleading, fraudulent or unfair
- respect customer privacy and provide protection for personal data in accordance with the relevant local law.

Suppliers

Ethical Purchasing Policy

We are committed to obtaining and retaining competitive goods and services while at the same time ensuring they are from sources which have not jeopardised human rights, safety or the environment.

We aim to develop strong relationships with our suppliers, based on mutual trust, understanding and respect.

More specifically we expect our suppliers to:

- Adhere to business principles consistent with our own.
- Ensure that their products and services are produced and delivered to comply with all legislation relevant to their business.
- Seek to maintain continuous improvement in their supply chain relationship with us.
- Ensure they adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards in line with our own code and to ensure these issues are acceptably managed within the supply chain for any products supplied to us.

(e) We will seek to work with our key suppliers to:

- Develop long-term meaningful relations to the benefit of both parties.
- Improve the quality, environmental performance and sustainability of goods and services where this can be achieved to the benefit of both parties.

ENVIRONMENT

Environmental Policy

CarryaRound seeks to operate its business in a sustainable way, which minimises our impact on the environment. We operate a process of continuous improvement that reacts quickly to new advice and will seek always to apply the most up to date standards.

This takes account of several factors. Internally the approach manifests itself through the intelligent and minimal use of resources such as energy and water and effective waste handling, promoting multi-material recycling with zero-tolerance to landfill.

Externally we shall ensure that material suppliers hold similar values and have a process-driven approach in this area. We shall enter consult with clients on environmentally positive alternatives when developing merchandise programmes as well as ensuring continual focus with transport partners on programmes to reduce emissions impact.

Our policy is to strive to achieve continual improvement in environmental performance.

We are committed to:

- preventing pollution and reducing the overall impact of our operations on the environment.
- maintaining an internal management structure for the management of environmental issues which includes clearly defined responsibilities for environmental management capable of delivering this policy commitment
- complying with, and where possible exceeding applicable legal and other requirements relating to the organisation.
- monitoring our environmental performance and setting objectives and targets for improvement
- providing appropriate training and awareness programmes for our staff.

We recognise the key role we have to play in both reducing and contributing to greenhouse gas emission.

ISO 14001:2004 and ISO 9001:2000 to ISO 9001:2008