



# Information pack

## Vaculug Ltd Information Pack:

- Quality Management
- Health and Safety Management
- Environmental Management
- Waste
- Insurance

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## Foreword

Vaculug is proud to have been the first UK-based tyre remoulding company to hold BSI Certification for Quality, Health and Safety and Environmental Systems Management.

At Vaculug, we want all of our customers to be confident that the products we make for them have been manufactured to the best possible quality standards, in a safe and healthy way, whilst minimising our impact on the environment.

To ensure we deliver on this commitment, all of our processes are externally audited by BSI and copies of their certification for ISO 9001, 14001 and 45001 are included in this pack. The audit processes help to ensure that we not only get things right but that we also focus on continual improvement to help deliver a better level of product and service for you.

In selecting Vaculug as a supplier, you can be assured that we will meet the highest level of compliance across all key areas and any potential risk to you is reduced. We believe in doing the right thing all of the time and our standards of excellence have been independently scrutinised and have passed the test.

Jorge Crespo  
Managing Director



## Policy Statement

Vaculug Limited regards the Environmental, Health, Safety and Quality responsibilities of the Company and those who may be affected by its activities as being of prime importance.

The Company is committed to:

- Providing customers with a first class Retread Product manufactured in a safe and efficient manner.
- The continuous improvement of our Management Systems, our Products and their Performance.
- The protection of the Environment, the prevention of pollution and environmental impacts related to our business.
- Communication, participation and consultation with Vaculug Team Members.

The Company maintains and audits a Management System that provides the framework to:

- Eliminate hazards, reduce and control the risks arising from our work.
- Provide team members with information, instruction, training and supervision to ensure that they are competent to fulfil their roles.
- Provide safe and healthy working conditions for the prevention of work related injury or ill health.
- Meet and, where possible, exceed regulatory, legislative and compliance obligations.
- Enhance the Environmental, Health, Safety and Quality performance of the business.
- Set, monitor and review targets, objectives, performance and improvement opportunities on a regular basis.
- Minimise waste, recycle where possible and make efficient use of energy and other important resources.
- Maintain the standards required by ISO 9001, ISO 14001 and ISO 45001.

This policy is supported by Risk Assessments, Environmental Aspects, Technical Schedules and Additional Policies that apply to all Company activities.

All team members are required to:

- Take reasonable care of themselves and others.
- To cooperate with Vaculug in assisting them to fulfil their statutory duties to achieve the Company's Safety, Quality and Environmental standards.

All team members are made aware of this policy through induction, training and display.

The Managing Director has overall responsibility for the implementation and maintenance of our Management Systems.

# Certificate of Registration

QUALITY MANAGEMENT SYSTEM - ISO 9001:2015

This is to certify that:

Vaculug Limited  
Gonerby Road  
Gonerby Hill Foot  
Grantham  
Lincolnshire  
NG31 8HE  
United Kingdom

Holds Certificate Number:

FM 11388

and operates a Quality Management System which complies with the requirements of ISO 9001:2015 for the following scope:

**The manufacture of retread tyres for commercial, industrial and earthmoving vehicles, as well as the repair and polyurethane filling of tyres for such vehicles.**



For and on behalf of BSI:

Matt Page, Managing Director Assurance - UK & Ireland

Original Registration Date: 1991-01-01

Latest Revision Date: 2023-01-27

Effective Date: 2023-03-17

Expiry Date: 2026-03-16

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Information and Contact: BSI, Kitemark Court, Davy Avenue, Knowlhill, Milton Keynes MK5 8PP. Tel: + 44 345 080 9000  
BSI Assurance UK Limited, registered in England under number 7805321 at 389 Chiswick High Road, London W4 4AL, UK.  
A Member of the BSI Group of Companies.



Vehicle  
Certification  
Agency

THE UNITED KINGDOM VEHICLE APPROVAL AUTHORITY

COMMUNICATION CONCERNING THE APPROVAL GRANTED <sup>(1)</sup>/ APPROVAL EXTENDED <sup>(1)</sup>/  
APPROVAL REFUSED <sup>(4)</sup>/ APPROVAL WITHDRAWN <sup>(4)</sup>/ PRODUCTION DEFINITELY  
DISCONTINUED <sup>(4)</sup> OF A RETREADING PRODUCTION UNIT PURSUANT TO REGULATION NO.  
109



Approval No: E11\*109R00/09\*0003\*07\*07


1. Retreader's name or trade mark:  
Vacu-Lug Traction Tyres Ltd
2. Name and address of retreading production unit:  
Vacu-Lug traction Tyres Limited  
Gonerby Hill Foot  
Grantham  
Lincolnshire  
NG31 8HE  
United Kingdom
3. If applicable, name and address of retreader's representative: Not Applicable
4. Summarized description as in paragraphs 4.1.3. and 4.1.4. of this Regulation:  
See Application Document
5. Technical service and, where applicable, test laboratory approved for purposes of approval or verification of conformity:  
Tun Abdul Razak Research Centre  
Brickendonbury  
Hertfordshire  
SG13 8NL  
United Kingdom

Job Number: VSV488692

An executive agency of the Department for Transport  
December 2017 Revision 8  
Page 1 of 2



Test World Oy  
Nellimintie 569,  
P.O. Box 167,  
FIN-99801 Ivalo,  
Finland

6. Date of report issued by that service: 21 January 2000, 20 July 2016, 22 January 2020, 13 February 2014 and 04 December 2017
  7. Number of report issued by that service: RC29108, RC25607, RC29108, TR 2014 007 SG and TW-TL17-GI055-E109SP
  8. Reason(s) of extension (if applicable): Update Core Product List
  9. Any remarks: Not Applicable
  10. Place: BRISTOL
  11. Date: 13 MARCH 2020
  12. Signature   
D LAWLOR  
Chief Technical and Statutory Operations Officer
  13. Annexed to this communication is a list of documents in the approval file deposited at the Approval Authority which has considered this approval and which can be obtained upon request.
- (1) Delete that which does not apply.

Job Number: VSV488692

An executive agency of the Department for Transport  
December 2017 Revision 8  
Page 2 of 2



22/02/22



**VACULUG LIMITED**

**Became a member of the Avetta Consortium on:**

**18/12/15**

This document certifies that the company above is a Member of the Avetta Consortium. Being an Avetta Consortium Member signifies that you are part of a global effort to advance company and worker safety, sustainability, and operational excellence. Consortium Members represent a pursuit of excellence in delivery, safety and sustainability.

*Arshad Matin*

Arshad Matin, President and CEO



*Taylor Allis*

Taylor Allis, Chief Product Officer

# Certificate of Registration

ENVIRONMENTAL MANAGEMENT SYSTEM - ISO 14001:2015

This is to certify that:

Vaculug Limited  
Gonerby Road  
Gonerby Hill Foot  
Grantham  
Lincolnshire  
NG31 8HE  
United Kingdom

Holds Certificate Number:

EMS 565953

and operates an Environmental Management System which complies with the requirements of ISO 14001:2015 for the following scope:

**Remoulding of tyres and associated activities.**

For and on behalf of BSI:



Matt Page, Managing Director Assurance - UK & Ireland

Original Registration Date: 2011-02-21

Latest Revision Date: 2023-02-17

Effective Date: 2023-02-22

Expiry Date: 2026-02-21

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Information and Contact: BSI, Kitemark Court, Davy Avenue, Knowlhill, Milton Keynes MK5 8PP. Tel: + 44 345 080 9000  
BSI Assurance UK Limited, registered in England under number 7805321 at 389 Chiswick High Road, London W4 4AL, UK.  
A Member of the BSI Group of Companies.

## Recycling and Carriage of Waste Tyres

End-of-life tyres are collected from the customer or service partner's location using our logistics partner DX Network Services Ltd (Waste Carriers Licence included).

They are transported to our retreading facility in Lincolnshire which is covered by Waste Management Licence EML: L172 /EPR 70948.

Tyres are inspected on arrival for retreading suitability and tyres that are fit for retreading are processed in line with our ISO 9001 Quality Management System.

Tyres that are unfit for retreading and any rubber waste that is generated by the retreading process are both collected from us by Murfitts Industries for granulating (Waste Carriers Licence attached). The granulation process reclaims all of the steel from the worn casing and the granulated rubber is formed into crumb.

In 2020, Vaculug recycled 4,999 tonnes of tyres and produced 4,099 tonnes of rubber crumb to be used in sports' surfaces and children's playgrounds, as well as 900 tonnes of recycled steel.

A copy of our 2020 Environmental Statement from Murfitts is attached.

# Certificate of Registration under the Waste (England and Wales) Regulations 2011

## Regulation authority

Name



Address

National Customer Contact Centre  
99 Parkway Avenue  
Sheffield  
S9 4WF

Telephone number

03708 506506

The Environment Agency certify that the following information is entered in the register which they maintain under regulation 28 of the Waste (England and Wales) Regulations 2011.

## Carriers details

Name of registered carrier

DX NETWORK SERVICES LTD

Registered as

An upper tier waste carrier, broker and dealer

Registration number

CBDU100825

Address of place of business

Ditton Park  
Riding Court Road  
Datchet  
Slough  
SL3 9GL

Telephone number

07854902633

Date of registration

29 April 2022

Expiry date of registration (unless revoked)

15 May 2025

## Making changes to your registration

Your registration will last 3 years and will need to be renewed after this period. If any of your details change, you must notify us within 28 days of the change.

# Certificate of Registration under the Waste (England and Wales) Regulations 2011

## Regulation authority

Name



Address

National Customer Contact Centre  
99 Parkway Avenue  
Sheffield  
S9 4WF

Telephone number

03708 506506

The Environment Agency certify that the following information is entered in the register which they maintain under regulation 28 of the Waste (England and Wales) Regulations 2011.

## Carriers details

Name of registered carrier

MURFITTS INDUSTRIES LIMITED

Registered as

An upper tier waste carrier, broker and dealer

Registration number

CBDU146108

Address of place of business

MURFITTS INDUSTRIES LTD  
STATION ROAD  
LAKENHEATH  
BRANDON  
IP27 9AD

Telephone number

07377722803

Date of registration

26 October 2022

Expiry date of

registration (unless revoked)

20 December 2025

## Making changes to your registration

Your registration will last 3 years and will need to be renewed after this period. If any of your details change, you must notify us within 28 days of the change.



Murfitts Industries Limited

## Environmental Statement 2022

Customer: Vaculug Limited

### Quantity of Tyres Recycled – 6129 tonnes

We hereby confirm that the above mentioned company have sent to our Lakenheath Recycling Facility 6129 tonnes of waste tyres.

#### Environmental Benefit

The 6129 tonnes of tyres resulted in the production of 5026 tonnes of rubber granulate used in sports surfaces and children's playgrounds and 1103 tonnes of recycled steel.

The use of these recycled products resulted in an overall CO<sub>2</sub> emissions saving 16181 tonnes against using virgin materials

Signed  Jayne Phillips, Director

Date: 1<sup>st</sup> March 2023

# Certificate of Registration

## OCCUPATIONAL HEALTH & SAFETY MANAGEMENT SYSTEM - ISO 45001:2018 (SSIP)

This is to certify that:

Vaculug Limited  
Gonerby Road  
Gonerby Hill Foot  
Grantham  
Lincolnshire  
NG31 8HE  
United Kingdom

Holds Certificate Number:

OHS 596457

and operates an Occupational Health and Safety Management System which complies with the requirements of ISO 45001:2018 (SSIP) for the following scope:

**Remoulding of tyres and associated activities.**

**Full validation of this certificate should be made via SSIP Portal  
[www.ssiportal.org.uk](http://www.ssiportal.org.uk)**

**[Previously certified to BS OHSAS 18001:2007 since 2014-03-07]**

For and on behalf of BSI:



Matt Page, Managing Director Assurance - UK & Ireland

Original Registration Date: 2019-06-21

Effective Date: 2023-03-07

Latest Revision Date: 2023-03-03

Expiry Date: 2026-03-06



SAFETY  
SCHEMES IN  
PROCUREMENT

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Information and Contact: BSI, Kitemark Court, Davy Avenue, Knowlhill, Milton Keynes MK5 8PP. Tel: + 44 345 080 9000  
BSI Assurance UK Limited, registered in England under number 7805321 at 389 Chiswick High Road, London W4 4AL, UK.  
A Member of the BSI Group of Companies.

## Service Partners

Vaculug remains the largest independent manufacturer of retread tyres in Europe and has a major partnerships with Pirelli (Prometeon), Hankook and GiTi. Vaculug is also the UK agent for Yokohama and Westlake. To complement this, Vaculug has the ability to select a service partner that is best suited for the operation and location in question.

We utilise much of the network on a national basis and have our own selected service providers made up from the larger of the UK's Independent Tyre Distributors (Vaculug Independent Partners).

Whichever network we use our joint overall objective is to provide service levels which exceed our customers' expectations.

When working with a service partner on a particular agreement, we evaluate them on many levels and, over the years, have worked with many of the national organisations and regional independents. We constantly monitor and review our partners, specifically their compliance and abilities in the following areas:

- Their ability to provide a high standard and maintain continuity of service.
- Their area of coverage, national or regional.
- Their reputation and customer acceptance.
- Their willingness to stock policy tyres.
- Their emergency breakdown response times.
- Agreement with, and signing of, the Vaculug Service Policy Document.
- The provision of properly fitted out service vehicles.
- The provision of training for fitters.
- The level of compliance with Health and Safety, Insurance, Environmental Policies, Equipment inspections and BSI standards.

## Alcumus SafeContractor

SafeContractor is a third-party accreditation scheme that assesses the Health and Safety arrangements and competence of Vaculug against set standards and our ability to subcontract work.

Annual re-accreditation and audit of documents including risk assessments, safe systems of work and other areas such as training records ensures that high standards are maintained and achieved.



# Certificate of Accreditation

**This is to certify that**  
VACULUG LIMITED

**has achieved SafeContractor accreditation**

**Date:** 31st October 2023

**This certificate is valid until:** 24th November 2024

**Certificate number:** TX3739

This SafeContractor Accreditation has been awarded on the back of the SSIP deem to satisfy process:

**SSIP Originator Scheme:** British Standards Institution (BSI)

**SSIP Originator Scheme expiry:** 06/03/2026

**Signed:**

Alyn Franklin  
Alcumus CEO



**Alcumus SafeContractor**, Axys House, Parc Nantgarw, Cardiff, CF15 7QX

**T:** 029 2026 6749 **E:** [safecontractor@alcumus.com](mailto:safecontractor@alcumus.com) **W:** [www.alcumus.com](http://www.alcumus.com) | [www.safecontractor.com](http://www.safecontractor.com)

This certificate is the property of Alcumus SafeContractor and must be returned on request



*This is to certify that*

**Vaculug Ltd**

Gonerby Road, Gonerby Hill Foot,  
Grantham, NG31 8HE

*Is (subject to the RHA's Terms & Conditions) elected*  
a **Member\*** of the **RHA**

*Valid from 01/09/2023 to 31/08/2024*

*Membership No: 0035741-000*

*Finance Customer Number: 192871*

Chair Person

Vice Chair Person

Managing Director

This certificate remains the property of the Road Haulage Association Limited trading as the RHA and is issued in accordance with the RHA's Articles of Association, Rules and Code of Conduct (in each case, as updated from time to time, available upon request). It is to be surrendered to the Association on cessation of Membership.

\*All new membership applications are subject to the approval at the next applicable Regional Council meeting, which will be held within three months of the start of the membership period.

# CERTIFICATE OF MEMBERSHIP



THIS IS TO CERTIFY THAT:

**Vaculug**

IS A FULL MEMBER OF THE  
**TYRE RECOVERY ASSOCIATION**

MEMBERSHIP NO: 49

The above named company subscribes to the aims and objectives of the Association and has been independently audited and found to be compliant with the standards required under the TRA Responsible Recycler Scheme® as operated by the Tyre Recovery Association.

**THIS CERTIFICATE IS VALID**

FROM: 1<sup>st</sup> August 2023 TO: 31<sup>st</sup> March 2024

This certificate remains the property of the Tyre Recovery Association and may only be displayed with the Association's permission.

# CERTIFICATE OF MEMBERSHIP



RESPONSIBLE  
RECYCLER

THIS IS TO CERTIFY THAT:

**Vaculug**

IS A MEMBER OF THE  
**TRA RESPONSIBLE RECYCLER SCHEME**

MEMBERSHIP NO: 49

The above named company subscribes to the aims and objectives of the Association and has been independently audited and found to be compliant with the standards required under the TRA Responsible Recycler Scheme® as operated by the Tyre Recovery Association.

**THIS CERTIFICATE IS VALID**

FROM: 1<sup>st</sup> August 2023 TO: 31<sup>st</sup> March 2024

This certificate remains the property of the Tyre Recovery Association and may only be displayed with the Association's permission.

## TO WHOM IT MAY CONCERN

1<sup>st</sup> February 2023

Dear Sirs

We are the Risk and Insurance Managers for the client below and have pleasure in confirming details of their insurance arrangements as follows:-

### Insured Details:

Name(s) **Vaculug Limited**

Postal Address **Gonerby Hill Foot, Grantham, Lincolnshire, NG31 8HE, United Kingdom**

Business Description **Retreaders & suppliers of pneumatic and solid tyres, sale of new tyres, reconditioners and suppliers of tyre retreading equipment and raw materials for vulcanising processes, vehicle fleet tyre management, ancillary and associated activities and property owners.**

### Employers Liability

Insurer:	Aspen Insurance UK Ltd / American International Group UK Ltd
Policy number:	I06237923A0W / 0021903553
Cover period:	1 <sup>st</sup> February 2023 to 31 <sup>st</sup> January 2024
Limit of Indemnity any one occurrence:	£20,000,000

### Public / Products Liability

Insurer:	QBE UK Limited / Aspen Insurance UK Ltd
Policy number:	To Be Advised / B0485PA004777W
Cover period:	1 <sup>st</sup> February 2023 to 31 <sup>st</sup> January 2024
Limit of Indemnity any one occurrence and in the annual aggregate in respect of Products Liability:	£15,000,000
Excess in respect of each & every claim for injury and damage to property:	£5,000 increasing to £25,000 in respect of claims arising from Canada exports
Indemnity to Principal for whom our clients are working:	Included

Cover is subject to the full terms, conditions and exclusions of the policy.

This document is issued to you as a matter of information only and the issuance of this document does not: -

- i) create any contractual relationship between Arthur J. Gallagher Insurance Brokers Limited and the recipient
- ii) make the person or organisation to whom it has been issued an additional assured, nor does it modify in any manner the contract of Insurance between the Assured and the Underwriters.

# Certificate of Employers' Liability Insurance (a)

(Where required by regulation 5 of the Employers' Liability (Compulsory Insurance) Regulations 1998 (the Regulations), one or more copies of this certificate must be displayed at each place of business at which the Policyholder employs persons covered by this policy).

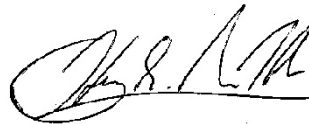
**Policy No.** Io6237923AoW (RLo786o23)

- 1. Name of Policyholder:-** Vaculug Limited
- 2. Date of commencement of insurance:-** 1st February 2023
- 3. Date of expiry of insurance:-** 31st January 2024

**We hereby certify** that subject to paragraph 2:-

1. The policy to which this certificate relates satisfies the requirements of the relevant law applicable in Great Britain, Northern Ireland, the Isle of Man, the Island of Jersey, the Island of Guernsey and the Island of Alderney, or to offshore installations in any waters outside the United Kingdom to which the Employers' Liability (Compulsory Insurance) Act 1969 or any amending primary legislations applies **(b)**; and
2. (a) The minimum amount of cover provided by this policy is no less than GBP 5 million **(c)**;

Signed for  
**ASPEN INSURANCE UK LIMITED**



Henry MacHale  
AIUK co-CUO

**Notes:-**

- (a)** Where the employer is a company to which regulation 3(2) of the Regulations applies, the certificate shall state in a prominent place, either that the policy covers the holding company and all its subsidiaries, or that the policy covers the holding company and all of its subsidiaries except any excluded by name, or that the policy covers the holding company and only the named subsidiaries.
- (b)** Specify applicable law as provided for in regulation 4(6) of the Regulations.
- (c)** See restriction 3(1) of the Regulations and delete whichever of paragraphs 2(a) or 2(b) does not apply. Where 2(b) is applicable, specify the amount of cover provided by the relevant policy.

Note: The information outside the above box does not form part of the statutory certificate. Aspen Insurance UK Limited requires the following information to be inserted by the issuing intermediary:

Name and address of issuing intermediary:

Issuing intermediary's reference:  
(If different from the Policy No. stated above)

**It is recommended that you retain a copy of each certificate for a period of 40 years beginning on the date on which the insurance to which this relates commences or is renewed.**

**IMPORTANT NOTICE**

Under the terms of the Employers' Liability (Compulsory Insurance) Regulations 2008 the requirement to display a certificate will be satisfied if it is made available in electronic form and each relevant employee to whom it relates has reasonable access to it in that form.

**Aspen Insurance UK Limited**

Registered in England No. 1184193

Registered Office: 30 Fenchurch Street, London, EC3M 3BD



# CERTIFICATE OF ASSURANCE

Vaculug Ltd

Vaculug Ltd Gonerby Hill Foot Grantham NG318HE

COMPLIES WITH THE REQUIREMENTS OF THE CYBER ESSENTIALS SCHEME

NAME OF ASSESSOR : Gavin Hitchmough

CERTIFICATE NUMBER : 73cfec9a-4d1b-4ce6-9f60-77e546f5d629

DATE OF CERTIFICATION : 2022-09-07

PROFILE VERSION : 3

RECERTIFICATION DUE : 2023-09-07

SCOPE : Whole Organisation



SCAN THIS QR CODE TO VERIFY THE AUTHENTICITY OF THIS CERTIFICATE

CERTIFICATION MARK



CERTIFICATION BODY



CYBER ESSENTIALS PARTNER



IASME  
CONSORTIUM

The Certificate certifies that the organisation was assessed as meeting the Cyber Essentials implementation profile and thus that, at the time of testing, the organisation's ICT defences were assessed as satisfactory against commodity based cyber attack. However, this Certificate does not in any way guarantee that the organisation's defences will remain satisfactory against a cyber attack.

## Equal Opportunities Statement

It is the policy of Vaculug to establish and maintain a working environment, terms and conditions of service and employment practices and procedures, which will ensure that no job applicant or employee receive less favourable treatment on the grounds of:

Race, religion, colour, nationality, ethnic or national origins, disability, sex, marital status, sexual orientation, responsibility for dependants, age, trade union, political activities or any other reason which cannot be shown to be justified.

The Company is committed to challenging inequality, discrimination and disadvantage and to achieving a high standard of employment practice. Equality of opportunity for all sections of the community and workforce is an integral part of this commitment.

Action will be taken wherever covert and overt racism, harassment, discrimination or disadvantage is found in order to ensure equality of access to employment and services for all. Working in partnership with the GMB, the Company will aim to remove any barriers to fair and equal treatment, which perpetuate disadvantage.

Our objectives are:

- To ensure that all staff give consideration to equal opportunities in the decisions they take, are aware of their duty under current legislation which prohibits discrimination in employment and are informed of the Company Statement on Equal Opportunity.
- To apply equal opportunities principles to recruitment, promotion and training.
- To ensure that applicants for employment and candidates for transfer and promotion are considered on the basis of the relevant qualifications, skills, aptitudes and abilities that they possess.
- To encourage all employees to take advantage of suitable opportunities for training or advancement and to ensure positive action is taken to enable under-represented groups to achieve their potential.
- Act promptly on any complaints about our employment practices and service delivery in order to maintain appropriate and effective working procedures.
- Promote tolerance and respect between diverse groups of people.
- Any employee who believes that he/she is being treated less favorably should raise the matter through the Grievance Procedure.
- The Company values diversity and welcomes applications from all sections of the community.

We similarly expect these standards from our suppliers and sub-contractors.

## Anti-Facilitation of Tax Evasion Policy

Vaculug has a zero-tolerance approach to tax evasion and the facilitation of tax evasion offences and this policy is endorsed by our senior management. We expect the organisations, businesses, and people we engage with to comply with their tax obligations. We do not tolerate any of our employees, suppliers, agents or business partners benefiting from or knowingly assisting or encouraging tax evasion or fraud.

Our commitment to ensuring that all appropriate taxes are paid by us and those who we do business with, includes:

- ☉ Complying with all relevant laws;
- ☉ Carrying out business fairly, honestly and openly;
- ☉ Refusing to provide our services where we know or suspect them of being misused or abused by a supplier for the purposes of tax evasion; nor will we aide, facilitate or support actions which assist in evasion of tax liabilities;
- ☉ Not buying services or goods from any supplier where we know or suspect them not to be properly declaring their income and any relevant tax and duties in connection with those activities;
- ☉ Implementing and monitoring a programme to counter the risk of us being involved in the facilitation of tax evasion.
- ☉ We will not engage in transactions which we know or suspect facilitates tax evasion, even if it may result in us losing income.



Jorge Crespo  
Managing Director

## Anti-Bribery & Corruption Policy

Vaculug is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on Vaculug's behalf is responsible for maintaining Vaculug's reputation and for conducting business honestly and professionally.

Vaculug considers that bribery and corruption has a detrimental impact in business by undermining good governance and distorting free markets.

Vaculug benefits from carrying out business in a transparent and ethical way. Vaculug does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any person or companies acting for it or on its behalf. The board and senior management are committed to implementing and enforcing effective systems to prevent and eliminate bribery, in accordance with the Bribery Act 2010.

Vaculug have issued an anti-bribery and corruption policy outlining Vaculug's position on preventing and prohibiting bribery and corruption. These Policies apply to all employees and they are required to familiarise themselves and comply with these Policies.

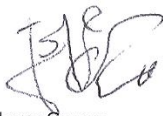
A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Employees and others acting for or on behalf of Vaculug are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments. As part of its anti-bribery measures, the Company accepts transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure, whether given or received.

A breach of these Policies by an employee will be treated as grounds for disciplinary action. Employees and other individuals acting for Vaculug should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for Vaculug.

Vaculug has a policy of not conducting business with service providers, agents or representatives that do not support appropriate anti-bribery and corruption objectives.

The success of Vaculug's anti-bribery and corruption measures depends on all employees, and those acting for Vaculug, playing their part in helping prevent bribery. Therefore, all employees and others acting for, or on behalf of, Vaculug are encouraged to report any suspected bribery in accordance with the procedures set out in the Policies or in the case of third parties to the Company Secretary. Vaculug will support any individuals who make such a report in good faith.



Jorge Crespo  
Managing Director

## Annual Slavery and Human Trafficking Report

May 2022

This document is Vaculug's Annual Slavery and Human Trafficking Report as required by Joint Schedule 5 of our agreement and sets out the steps we have taken to ensure that slavery and human trafficking is not taking place in any of our supply chains or in any part of our business.

### Modern Slavery, Child Labour and Inhumane Treatment

- Vaculug does not use, nor allow its Subcontractors to use forced, bonded or involuntary prison labour;
- Vaculug does not require any supplier staff or subcontractor staff to lodge deposits or identify papers with the employer and shall be free to leave their employer after reasonable notice;
- Vaculug has not been convicted of any slavery or human trafficking offences anywhere around the world.
- Vaculug is not currently under investigation, inquiry or enforcement proceedings in relation to any allegation of slavery or human trafficking offenses anywhere around the world.
- Vaculug has undertaken measures to ensure that our officers, employees and subcontractors have not been convicted of slavery or human trafficking offenses anywhere around the world.
- Vaculug maintain throughout the term of each contract policies and procedures to ensure our compliance with the Modern Slavery Act and we include in our contracts with subcontractors anti-slavery and human trafficking provisions;
- Vaculug has implemented due diligence procedures to ensure that there is no slavery or human trafficking in any part of our supply chain performing obligations under a contract;
- Vaculug does not use, nor allow its employees or subcontractors to use physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation of its employees or subcontractors;
- Vaculug does not use or allow child or slave labour to be used by its subcontractors;
- In line with our procedures we will immediately report the discovery or suspicion of any slavery or trafficking by it or its subcontractors to CCS, the Buyer and Modern Slavery Helpline.

I confirm my company is not in scope of Section 54 of the Modern Slavery Act (2015).



Jorge Crespo  
Managing Director

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Email	<a href="mailto:info@vaculug.com">info@vaculug.com</a>
Co Registration No.	00488961
Year of Incorporation	1 <sup>st</sup> December 1950
The Tyre Equipment Co.	01905 821697 01476 513801
Tyre Equipment Website	<a href="http://www.tyre-equipment.co.uk">www.tyre-equipment.co.uk</a>
Email	<a href="mailto:sales@tyre-equipment.co.uk">sales@tyre-equipment.co.uk</a>