



## DISCLOSURE MATERIALS

Certified B Corporations must complete a Disclosure Questionnaire to identify potentially sensitive issues related to the company (e.g. historical fines, sanctions, material litigation, or sensitive industry practices).

This component does not affect the company's score on the B Impact Assessment. If the company answers affirmatively to any items in the Disclosure Questionnaire and B Lab deems them to be material, the company must:

- 1) Be transparent about the disclosure issues identified on the company's public B Impact Report
- 2) Describe how the company has addressed this issue.
- 3) Demonstrate that management systems are in place to avoid similar issues from arising in the future.

In all cases, the Standards Advisory council reserves the right to refuse certification if the company is ultimately deemed not to uphold the spirit of the community.

In addition to the voluntary indication of sensitive issues in the Disclosure Questionnaire, companies pursuing Certification also are subject to background checks by B Lab staff. Background checks include a review of public records, news sources, and search engines for company names, brands, executives/founders, and other relevant topics.

Sensitive issues identified through background checks may or may not be within the scope of questions in the Disclosure Questionnaire, but undergo the same review process and are subject to the same possible review by the Standards Advisory Council, including ineligibility for B Corp Certification, required remediation, or disclosure.

**This document contains a copy of the company's completed Disclosure Questionnaire and related disclosure documentation provided by the company.**



## DISCLOSURE QUESTIONNAIRE

Company Name: Recycling Lives Holding Ltd  
 Date Submitted: 11/11/2022

Industries & Products	Yes	No
Please indicate if the company is involved in production of or trade in any the following. Select Yes for all options that apply.		
Animal Products or Services		√
Biodiversity Impacts		√
Chemicals		√
Company Explanation Of Disclosure Item Flags		√
Disclosure Alcohol		√
Disclosure Firearms Weapons		√
Disclosure Mining		√
Disclosure Pornography		√
Disclosure Tobacco		√
Energy and Emissions Intensive Industries		√
Fossil fuels		√
Gambling		√
Genetically Modified Organisms		√
Illegal Products or Subject to Phase Out		√
Industries at Risk of Human Rights Violations		√
Monoculture Agriculture		√
Nuclear Power or Hazardous Materials		√
Payday, Short Term, or High Interest Lending		√
Water Intensive Industries		√
Tax Advisory Services		√

Supply Chain Disclosures	Yes	No
Please indicate if any of the following statements are true regarding your company's significant suppliers.		
Business in Conflict Zones		√
Child or Forced Labor		√
Negative Environmental Impact		√
Negative Social Impact		√
Other		√

Outcomes & Penalties	True	False
Please indicate if the company has had any formal complaint to a regulatory agency or been assessed any fine or sanction in the past five years for any of the following practices or policies. Check all that apply.		
Anti-Competitive Behavior		√
Breaches of Confidential Information		√
Bribery, Fraud, or Corruption		√
Company Explanation Of Disclosure Item Flags		√
Company has filed for bankruptcy		√
Consumer Protection		√
Financial Reporting, Taxes, Investments, or Loans		√
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)		√
Labor Issues		√
Large Scale Land Conversion, Acquisition, or Relocation		√
Litigation or Arbitration		√
On-Site Fatality		√
Penalties Assessed For Environmental Issues		√
Political Contributions or International Affairs		√
Recalls		√
Significant Layoffs		√
Violation of Indigenous Peoples Rights		√
Other		√

Practices	True	False
Please indicate if the following statements are true regarding whether or not the company engages in the following practices. Check all that apply. If the statement is true, select "Yes." If false, select "No."		
Animal Testing		√
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)		√
Company Explanation Of Disclosure Item Flags		√
Company prohibits freedom of association/collective bargaining		√
Company workers are prisoners		√
Conduct Business in Conflict Zones		√
Confirmation of Right to Work		√
Does not transparently report corporate financials to government		√
Employs Individuals on Zero-Hour Contracts		√
Facilities located in sensitive ecosystems		√
ID Cards Withheld or Penalties for Resignation		√
No formal Registration Under Domestic Regulations		√
No signed employment contracts for all workers		√
Overtime For Hourly Workers Is Compulsory		√
Payslips not provided to show wage calculation and deductions		√
Sale of Data		√
Tax Reduction Through Corporate Shells		√
Workers cannot leave site during non-working hours		√
Workers not Provided Clean Drinking Water or Toilets		√
Workers paid below minimum wage		√
Workers Under Bond		√
Other	√	



## B Corp Certification - Disclosure Questionnaire Documentation

PROVIDED BY:

Recycling Lives Holding Ltd

UPDATED AS OF:

11/11/2022

<b>DISCLOSURE QUESTIONNAIRE CATEGORY</b>	Disclosure Nuclear Power or Hazardous Materials
<b>ISSUE DATE</b>	Ongoing
<b>TOPIC</b>	Recycling Lives Holding Ltd is a recycling company that processes a number of waste materials, including hazardous waste.
<b>SUMMARY OF ISSUE</b>	Recycling Lives Holding Ltd, as producer and carrier of hazardous waste defined according to Waste Classification Technical guidance WM3.
<b>SIZE/SCOPE OF ISSUE</b> (e.g. \$ financial implication, # of individuals affected)	Hazardous Waste handled is 26% of the total amount of waste handled by Recycling Lives Revenue from hazardous waste is approximately 30% of total revenue.
<b>IMPACT ON STAKEHOLDERS</b>	Hazardous waste, due to its physical-chemical and infectious properties, may pose a risk to public health and the environment.



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DISCLOSURE QUESTIONNAIRE CATEGORY	Disclosure Nuclear Power or Hazardous Materials Cont.
ISSUE DATE	Ongoing Cont.
IMPLEMENTED MGT PRACTICES	<ul style="list-style-type: none"> <li>• Recycling Lives Holdings Ltd shared that the recycling industry in the UK is a highly regulated industry. The UK's Environment Agency (EA) is the key body that licenses the company's activities under the Environmental permitting Regulations 2016 and monitors its full compliance with the strict regulations surrounding the handling of waste,</li> <li>• The company is regulated under the Environmental permitting Regulations 2016 for our waste operations including hazardous waste, where we have criteria to follow to be in compliance and avoid any type of negative impact on the environment, local communities and workers. Recycling Lives follows the Waste Duty of Care Code of Practice under section 34 of the Environmental Protection Act 1990 to ensure that further processors taking our hazardous waste are also compliant and that the company does not create a negative impact on their process,</li> <li>• The company has control measures for the handling of all waste types defined in compliance with the Environmental Permitting Regulations,</li> <li>• Under the Waste Classification Technical guidance WM3 some of the materials it handles are listed as hazardous waste. This hazardous waste has been assessed to determine which hazardous properties it displays to identify particular care required when handling to cause no harm or damage to people or the environment. Two of the main hazardous materials handled by the organization are End of Life Vehicles (ELVs, cars which have reached the end of their operating life and need to be recycled) and Waste Electrical and Electronic Equipment (WEEE, in the company's case, mostly consumer electronics which require recycling),             <ul style="list-style-type: none"> <li>- In the case of ELVs, these are classified as hazardous due to the components and materials they contain, e.g. batteries, catalytic converters, as well as oils and fuels. According to the company, to handle ELVs the EA requires that all premises processing ELVs are licensed as ATFs (Approved Treatment Facilities). All Recycling Lives facilities involved with ELVs are ATFs and as such the company is licensed and audited on the depollution processes required on a car before it can further process the metal body and other non-hazardous materials within it which may up the bulk of its volume. These include proper removal and storage of the car battery and catalytic converters for sending to specialist contractors who further recycle these, as well as careful draining of all fluids and gases from the car (fuels, oils, brake fluids, A/C gas etc) for onward processing, recovering and recycling by specialist companies. The company uses specialised rigs to conduct this work and trained depollution operatives to conduct all these processes.</li> <li>- WEEE within Recycling Lives includes such materials as internet routers, domestic appliances products such as TVs and other electrical items. Some of these items are classified as hazardous waste under the Waste Classification list WM3 due to the presence of Persistent Organic Pollutants (POPs), within some of them, e.g. due to batteries, flame retardants, capacitors, cathode ray tubes etc. The WEEE material classified as hazardous are dismantled for further recovery of non-hazardous material and/or stored for further processing by specialist companies who will collect them for further recovery and recycling.</li> </ul> </li> <li>• Health and Safety policies, measures, practices, training and behaviours are implemented in all of the company's sites for all workers.</li> </ul>