

Environmental Responsibility and Business Integrity Policy

1. Introduction

At IGO LIFE LIMITED we are dedicated to incorporating sustainable practices and ethical business conduct into our operations. This policy highlights our commitment to adhering to all relevant UK laws and regulations concerning environmental management and business integrity. Our goal is to reduce our environmental footprint while maintaining the utmost level of ethical behaviour and transparency in our business transactions.

2. Scope

This policy applies to all employees, directors, contractors, and representatives acting on behalf of IGO LIFE LIMITED. It governs all operations, business functions, and locations under our control.

3. Environmental Responsibility

- Compliance with Environmental Laws and Regulations
- Legal Adherence: IGO LIFE LIMITED shall comply with all applicable UK environmental legislation, including (but not limited to) the Environmental Protection Act 1990, relevant environmental permitting regulations, and any updates to statutory requirements. Specific legislation applicable to iGo Life's operations includes: the Waste Electrical and Electronic Equipment (WEEE) Regulations 2013; the Environmental Permitting (England and Wales) Regulations 2016 (under which iGo Life holds T11 Waste Exemption Ref: EXP/ZP3547YH for WEEE repair and refurbishment); the Waste (England and Wales) Regulations 2011 (under which iGo Life is registered as an Upper Tier Waste Carrier, Broker and Dealer, Reg No: CBDU531660); the Hazardous Waste (England and Wales) Regulations 2005 (as amended 2016); the Batteries and Accumulators (Placing on the Market) Regulations 2008; the Control of Substances Hazardous to Health (COSHH) Regulations 2002; the Producer Responsibility Obligations (Packaging Waste) Regulations 2007 and the Environment Act 2021 (Extended Producer Responsibility for Packaging and Simpler Recycling); the UK General Data Protection Regulation 2021 and Data Protection Act 2018; and the Climate Change Act 2008.
- Regulatory Monitoring: We will continuously monitor legal developments and adjust our operations to remain compliant.

3.1 Sustainable Practices in Production

- Resource Efficiency: Integrate sustainable practices into production processes to reduce energy consumption, raw material usage, and environmental emissions.
- Innovation: Embrace technologies and practices that lower the environmental footprint of our operations.

3.2 Waste Management

- Waste Reduction: iGo Life operates a reduce, reuse, recycle model at the core of its business. Our primary environmental commitment is to maximise the number of devices fully refurbished and returned to active use. Where full refurbishment is not possible, serviceable components are recovered and reused to support refurbishment of other devices, contributing to a circular economy model and reducing material sent for disposal. Devices and components that cannot be refurbished or reused are directed to an EA-registered Authorised Treatment Facility (AATF) for responsible WEEE recycling. All data on devices is securely erased using certified erasure software prior to resale or reuse, with erasure certificates retained; devices requiring physical destruction are processed by a certified contractor with certificates of destruction retained.

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3.3 Regulatory Compliance: iGo Life holds and maintains all required environmental registrations and licences, including a T11 WEEE Repair/Refurbishment Exemption (Ref: EXP/ZP3547YH) and an Upper Tier Waste Carrier, Broker and Dealer registration (Reg No: CBDU531660). All waste streams are handled by EA-registered contractors. Waste transfer notes and hazardous waste consignment notes are retained in accordance with statutory requirements. Lithium-ion batteries are stored in designated fire-safe containers prior to specialist collection. All chemical substances used in refurbishment are managed under a COSHH register with completed Safety Data Sheets, reviewed annually.

3.4 Continuous Improvement

- Audits and Reviews: Conduct regular environmental audits and set measurable targets for reducing environmental impact.
- Training and Engagement: Provide ongoing training to employees on best practices and engage with stakeholders to further our environmental objectives.

3.5 Transport and Logistics

- Efficient Collection Routing: Device collections are consolidated to minimise unnecessary journeys. Routes are planned for efficiency by location, timing and workload. iGo Life holds an Upper Tier Waste Carrier registration (CBDU531660) authorising the carriage of waste in the course of its business. Transport emissions per device collected are monitored and we seek to reduce this over time.
- Courier and Dispatch: iGo Life uses an established courier with a regular collection at our facility. Collection labels are used wherever feasible for inbound devices to avoid unnecessary vehicle journeys. We use recyclable packaging materials wherever practicable and seek to minimise packaging to the level required for safe device transit.
- Remote-First Working: iGo Life operates a remote-first meeting policy. Video calls are the default for all meetings where travel is not essential. Where business travel is necessary, use of public transport or low-emission vehicles is encouraged as a general principle.

4. Business Integrity

4.1 Anti-Corruption and Anti-Bribery

At IGO LIFE LIMITED, we are dedicated to upholding our commitment to integrity and ethical business practices. It is crucial for the success of our organization and the well-being of all our employees and representatives.

- Zero Tolerance: IGO LIFE LIMITED maintains a strict zero-tolerance approach towards bribery, corruption, or any form of facilitation payments, in line with the UK Bribery Act 2010.
- Clear Guidelines: All employees and associated representatives must refrain from offering, accepting, or soliciting any form of bribe or improper advantage.

4.2 Avoidance of Conflicts of Interest

- Personal vs. Professional Interests: Employees and decision-makers must avoid any personal, financial, or other interests that could conflict with the interests of IGO LIFE LIMITED.
- Disclosure: Any actual or potential conflicts of interest must be disclosed immediately to management through the designated reporting channels.

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4.3 Transparency and Ethical Conduct

Transparency is key in maintaining the integrity of our work and relationships.

We commit to conducting all business operations with transparency, fairness, and integrity.

4.4 Reporting and Investigation

- If you suspect any violations of this policy, please use the secure and confidential system available to report it in writing to William Buxton. It is important that all incidents are reported promptly so that thorough investigations can be conducted and necessary corrective measures can be implemented. Your cooperation in ensuring a safe and compliant work environment is greatly appreciated.
- Thorough Investigations: All reported incidents will be investigated promptly, and corrective measures will be implemented where necessary.

5. Responsible Sourcing of Minerals

- Supplier Verification: Ensure suppliers provide verifiable proof of conflict-free sourcing (e.g., certifications, audits, adherence to frameworks like the OECD Due Diligence Guidance).
- Risk Assessment: Implement regular risk assessments focusing on the geographic and political risks in the mineral supply chain.
- Monitoring and Auditing: Establish a process for continuous monitoring and auditing of suppliers to ensure ongoing compliance with conflict-free sourcing standards.

6. Roles and Responsibilities

6.1 Management

William Buxton is responsible for policy oversight, ensuring that this policy is effectively communicated, understood, and consistently implemented throughout IGO LIFE LIMITED. He will also oversee regular reviews of environmental and ethical performance, updating the policy as needed to reflect changes in legislation or operational practices.

6.2 Employees

All employees must ensure they are familiar with this policy and actively incorporate its principles into their daily activities to ensure compliance. We strongly encourage employees to report any breaches or concerns without fear of reprisal.

6.3 Compliance and Audit Team

William Buxton is responsible for monitoring adherence to this policy and conducting audits. Non-compliance will be addressed through the disciplinary procedure and, if necessary, legal action will be taken.

7. Implementation and Monitoring

- Integration: This policy shall be integrated into all operational procedures, employee training programs, and performance reviews.
- Performance Reviews: Regular environmental and ethical audits will be conducted to ensure ongoing compliance.
- Documentation: All actions taken under this policy will be documented and retained as part of our commitment to transparency and accountability.

8. Consequences of Non-Compliance

Please be advised that failure to comply with this policy may result in disciplinary action, up to and including termination of employment or contractual relationships. In cases of severe non-compliance

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IGO LIFE LIMITED will take necessary legal action in accordance with UK law. Thank you for your understanding and cooperation.

9. Policy Review and Amendments

- Regular Review: This policy will be reviewed at least annually or when significant legal or operational changes occur.
- Amendments: Any amendments must be approved by William Buxton and communicated to all employees and stakeholders.

10. Acknowledgement

All employees, contractors, and relevant parties must sign an acknowledgement confirming they have read, understood, and agreed to abide by this policy.

By implementing this policy IGO LIFE LIMITED reaffirms its commitment to environmental stewardship and ethical business conduct, ensuring sustainable growth and maintaining public trust.

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Appendix 1 2025 Environmental Management Implementation Plan

Specific to Clause 3

This appendix sets out the practical environmental management implementation plan for iGo Life Limited, proportionate to the scale and nature of the business, and reflects the actual operations, licences, and controls in place.

A. Regulatory Credentials – Maintained and Monitored

The following licences and registrations are held and maintained as current.

- (1) Upper Tier Waste Carrier, Broker and Dealer – Reg No: CBDU531660;
- (2) TII WEEE Repair/Refurbishment Exemption – Ref: EXP/ZP3547YH;
- (3) Public and Products Liability Insurance – reviewed and renewed annually.

B. WEEE and Device Refurbishment

All incoming devices are tested and graded. Where possible, devices are fully refurbished and returned to active use. Where full refurbishment is not viable, serviceable components are recovered and reused to support the refurbishment of other devices, contributing to a circular economy model and reducing the volume of material requiring disposal. Devices and components that cannot be refurbished or reused are directed to an EA-registered AATF for responsible WEEE recycling; disposal volumes are monitored. Staff receive training on WEEE classification and correct waste stream allocation. Data is securely erased on all devices using certified erasure software prior to resale or reuse; erasure certificates are issued and retained per device. Devices requiring physical destruction are processed by a certified contractor with certificates of destruction retained.

C. Waste Management – Contractors and Controls

Waste streams are segregated and collected by EA-registered contractors. Lithium-ion batteries are stored in designated fire-safe containers prior to specialist hazardous waste collection; battery storage is inspected regularly. Hazardous waste consignment notes and waste transfer notes are retained in accordance with statutory requirements. EA waste carrier credentials for all contractors are verified and retained on file, reviewed annually.

D. Chemicals and COSHH

A COSHH register with completed Safety Data Sheets is maintained for all chemical substances used in the refurbishment process, reviewed annually or when new substances are introduced. All chemicals are stored in a designated, labelled, lockable storage cabinet. Lower-impact cleaning products are considered on an ongoing basis where suitable alternatives are available.

E. Energy and Facilities

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LED lighting is installed throughout the facility. A culture of switching off non-essential equipment is maintained. Energy consumption is monitored year-on-year and reviewed at the annual management review. Heating and cooling is scheduled to working hours and temperature set-points are reviewed to avoid unnecessary energy use. Opportunities to reduce energy consumption and switch to lower-carbon energy sources are considered on an ongoing basis.

F. Transport, Logistics and Packaging

Device collections are consolidated – vehicles are not dispatched unless sufficient volume justifies the journey. Routes are planned for efficiency by location, timing and workload. An established courier is used for standard outbound dispatches and inbound collection labels wherever practicable. Transport emissions per device are monitored and we seek to reduce this over time. Recyclable packaging is used wherever practicable; packaging is kept to the minimum required for safe device transit. Extended Producer Responsibility (EPR) packaging obligations are assessed annually.

G. Annual Management Review – Environmental Performance Indicators

Environmental performance is reviewed at least annually by management. This review covers key indicators including refurbishment and reuse rates, waste volumes and compliance records, energy consumption, transport efficiency, regulatory credential currency, and packaging obligations. Targets are set and progress is tracked year-on-year.

Appendix 2: Data Erasure and Secure Disposal Procedure

This appendix documents the operational procedure for data erasure and secure disposal of data-bearing devices. It supplements Section 3.3 (Waste Management) and Appendix 1B of this policy, and operates alongside iGo Life's Data Protection Policy and the data destruction provisions of the Environmental Aspects Register (IGL-007).

A. Purpose and Legal Basis

All devices processed by iGo Life Limited may contain personal or commercially sensitive data belonging to previous owners. Secure erasure prior to resale, component recovery or disposal is a legal obligation under the UK General Data Protection Regulation 2021, the Data Protection Act 2018, and ICO guidance on the secure disposal of data-bearing devices. Failure to erase data constitutes a potential data breach and may give rise to ICO enforcement action, fines and reputational damage. iGo Life holds appropriate insurance cover for data-related liability claims.

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B. Erasure Method

iGo Life uses certified diagnostic and data erasure software as its primary data destruction method for all mobile devices and compatible IT equipment. The software provides a per-device erasure certificate upon successful completion of the erasure process. No device may be released for resale, component recovery, or onward transfer until a valid erasure certificate has been issued or physical destruction has been completed.

C. Step-by-Step Procedure

1. All incoming devices are logged on receipt. The device log records: date received, device type and model, serial number or IMEI, and origin (customer/source).
2. Each device is connected to the erasure system and the full diagnostic and erasure cycle is initiated. Staff must not interrupt the erasure process once started.
3. On successful completion, the erasure software issues a certificate. The certificate is saved to the iGo Life device record for that item. The target is 100% certificate issuance for all processed devices.
4. If a device fails the erasure process (e.g. due to a locked bootloader, activation lock, or hardware fault), it is immediately quarantined and tagged 'ERASURE FAIL – DO NOT PROCESS FURTHER'. The device must not be resold, parted out or donated. It proceeds to physical destruction only.
5. Physical destruction of non-erasable devices is carried out by an Environment Agency-registered Authorised Treatment Facility (AATF). A certificate of destruction is obtained from the contractor for each batch and retained on file for a minimum of three years.
6. Erasure certificate issuance rates are reviewed periodically. Any sustained fall below 100% is investigated and corrective action taken.

D. Customer Communication

Where iGo Life's data destruction service is provided to business customers as part of an ITAD engagement, the erasure process and certificate provision are referenced in the customer contract or service agreement. Customers may request copies of erasure certificates for their records. This supports customers' own data protection compliance obligations.

E. Records Retention

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Erasure certificates are retained electronically for a minimum of three years. Certificates of destruction from physical shredding contractors are retained for a minimum of three years. In the event of a data breach or ICO enquiry, these records provide evidence of compliance. Any data incident is reported to our insurer promptly and to the ICO within 72 hours where required by UK GDPR.

F. Responsibilities

William Buxton (Director) and Sonia Blakesley (H&S and Compliance) are responsible for ensuring this procedure is followed, that records are maintained, and that any data incidents are reported and investigated. All staff involved in device processing are trained in this procedure and the consequences of non-compliance.

Document Control

Version	Change Summary	Date
1	Initial issue. Environmental responsibility and business integrity policy established.	01/08/2025
2	iGo Life operational detail added. Environmental Aspects Register cross-references incorporated. Appendix 1 (Environmental Management Implementation Plan) added.	01/08/2025
3	Appendix 2 added: Data Erasure and Secure Disposal Procedure, covering erasure process, certificate issuance, failed erasure quarantine, physical destruction route, customer communication and records retention. Specific internal references (named software, insurer details) kept in internal operational documents only. Document control table added. Footer updated to Version 3.	25/03/2026