	Integrated Management System (IMS)	Date: 30-09-2025	
	Document Title: ENVIRONMENTAL, SOCIAL & GOVERNANCE (ESG) POLICY	Document Code: ALQAISAR-IMS-ESG-01	
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1. Introduction

Al Qaisar Recycling of WEEE LLC is a Waste Electrical and Electronic Equipment (WEEE) recycling and IT Asset Disposition (ITAD) provider in the UAE. We are committed to integrating Environmental, Social, and Governance (ESG) principles into our business operations to support sustainable development and responsible resource management.

This policy reflects our commitment to environmental protection, safe and ethical operations, data security, and compliance with applicable regulations. Our activities align with the UAE Circular Economy Policy and UAE Net Zero 2050 initiative.

2. ESG Vision

To be a leading regional provider of sustainable e-waste management and ITAD solutions, recognized for operational responsibility, environmental stewardship, and ethical business practices.

3. Environmental Commitment (E)

We are committed to minimizing environmental impact through responsible recycling and efficient resource recovery.

Key Commitments:


- Operate recycling processes aligned with ISO 14001 Environmental Management System principles.
- Apply R2v3 Responsible Recycling practices and internationally accepted e-waste handling standards.
- Ensure safe collection, transportation, dismantling, and processing of electronic waste.
- Promote material recovery to reduce landfill dependency and support circular economy objectives.
- Support UAE Net Zero 2050 and UAE Circular Economy Policy initiatives.
- Work with relevant authorities and partners to improve e-waste awareness and collection systems.
- Provide clients with transparent environmental impact and recycling reports.

Environmental Objectives:

- Increase annual e-waste processing volumes responsibly.
- Maintain zero environmental pollution incidents in operations.
- Conduct periodic e-waste awareness and collection activities.

4. Social Commitment (S)

We are committed to ensuring the well-being, safety, and development of employees and contributing positively to the community.

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Key Commitments:

- Provide a safe and healthy working environment in compliance with UAE Labour Law and ISO 45001 principles.
- Promote equal opportunity, fairness, and professional development for all employees.
- Conduct awareness programs in schools, universities, and organizations on responsible e-waste management.
- Support educational and community initiatives related to sustainability and circular economy.
- Protect customer and stakeholder data through secure handling and destruction processes aligned with ISO/IEC 27001 principles.

Social Objectives:

- Achieve zero workplace fatalities and continuous safety improvement.
- Provide regular employee training on safety and operational procedures.
- Conduct annual CSR and awareness initiatives.

5. Governance Commitment (G)

We maintain strong governance practices based on transparency, accountability, and ethical conduct.

Key Commitments:

- Comply with applicable UAE federal laws and local regulatory requirements.
- Maintain zero tolerance for bribery, corruption, and unethical practices.
- Ensure transparency in operations and reporting.
- Maintain traceability of waste materials through documented processing systems.
- Implement vendor due diligence for downstream recycling partners.
- Follow ISO 9001 Quality Management System principles.

Governance Objectives:


- Conduct annual ESG performance review by management.
- Perform regular audits of operational and downstream processes.
- Ensure all employees follow the company code of conduct and policies.

6. Stakeholder Engagement

We engage with customers, employees, suppliers, regulators, and local communities to support continuous improvement in environmental and operational performance. Feedback from stakeholders is considered in business decisions and operational enhancements.

7. Policy Review

This ESG Policy will be reviewed annually by management to ensure continued relevance, regulatory compliance, and alignment with industry best practices.

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8. Contact & Approvals

For ESG-related inquiries, please contact:

Phone: +97152870704

Email: info@qaisaritr.com

Website: alqaisarrecycling.com

Address: Office 28, Al Jurf Industrial Area 1, Ajman, UAE

Approved by: **Muhammad Sarfraz, CEO**





Integrated Management System (IMS)

Date: 30-09-2025

Document Title:

CODE OF CONDUCT & EMPLOYEE HANDBOOK

Document Code:
ALQAI SAR-IMS-COC-01

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1. Purpose

Al Qaisar Recycling of WEEE LLC is committed to conducting all business operations with integrity, respect, and professionalism. This Code of Conduct sets out the standards of behavior expected from all employees, contractors, and representatives.

2. Scope

This policy applies to all full-time, part-time, and temporary employees, as well as contractors and third-party representatives acting on behalf of the company.

3. Core Values

- **Integrity:** Act honestly and transparently in all business dealings.
- **Respect:** Treat colleagues, clients, and partners with dignity and fairness.
- **Accountability:** Take responsibility for your actions and decisions.
- **Sustainability:** Uphold our commitment to responsible e-waste recycling and environmental stewardship.
- **Excellence:** Strive for the highest standards in service delivery and operations.

4. Professional Conduct

All employees are expected to:

- Comply with UAE laws, regulations, and applicable international standards (**ISO 9001, ISO 14001, ISO 45001, ISO 27001, R2v3**).
- Perform duties diligently and to the best of their ability.
- Maintain absolute confidentiality of company and client information.
- Avoid any action that may bring the company into disrepute.
- Report any violations of this Code to management immediately.

5. Workplace Behavior

- Enforce a zero-tolerance policy for harassment, discrimination, or bullying of any kind.
- Maintain a safe, healthy, and inclusive work environment.
- Use company assets (equipment, vehicles, data systems) responsibly and for authorized business purposes only.
- Strictly adhere to designated working hours and attendance requirements.

6. Data Privacy & Secure Data Destruction (ITAD Compliance)

In alignment with **ISO 27001** and **R2v3 Core Requirement 7 (Data Security)**, Al Qaisar Recycling of WEEE LLC enforces a strict zero-tolerance policy regarding data privacy:



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- **Data Confidentiality:** Employees must never access, view, copy, modify, or extract any files, data, or personal information from electronic storage media brought to our facility for disposal or recycling.
- **Chain of Custody:** All personnel handling logistics, sorting, and processing must follow strict chain-of-custody tracking protocols to ensure data-bearing assets are never lost or unrecorded.
- **Destruction Protocols:** Data-bearing items (hard drives, solid-state drives, mobile phones, memory devices) must be destroyed or sanitized completely using authorized software or mechanical shredding machinery according to company Standard Operating Procedures (SOPs).
- **Asset Protection:** Removing any data-bearing item, drive, or electronic component from the facility for personal use, data extraction, or unauthorized resale is strictly prohibited and constitutes a criminal offense under UAE cyber and data privacy laws.

7. Health, Safety & Environment (HSE)

In alignment with **ISO 45001:2018** and **ISO 14001:2015**, Al Qaisar Recycling of WEEE LLC requires all employees to:

- Follow all health and safety procedures at the recycling facility.
- Wear appropriate personal protective equipment (PPE) at all times within operational areas.
- Report accidents, near misses, or environmental incidents immediately to the operations supervisor.
- Participate actively in all mandatory environmental and safety training programs.

8. Community & CSR Commitment

Al Qaisar Recycling of WEEE LLC actively contributes to community well-being through:


- Partnership with **Ajman Municipality** for e-waste collection bin placement across Ajman.
- CSR programs conducted in schools to raise e-waste and recycling awareness.
- Ongoing expansion of programs to government sectors, universities, and other public institutions.
- Supporting university students in conducting research on the environmental sustainability and waste management sector.

9. Disciplinary Action

Violations of this Code undermine the safety, compliance framework, and legal standing of our operations. Breach of these terms will result in disciplinary action up to and including immediate termination of employment, contract cancellation, and where applicable, the initiation of local civil or criminal legal proceedings.

Approved by: **Muhammad Sarfraz, CEO**



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	Conflict of Interest Policy	ALQAISAR-IMS-COI-01	
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1. Purpose

Al Qaisar Recycling of WEEE LLC requires all employees and contractors to act in the best interests of the company at all times. This policy identifies situations that may give rise to conflicts of interest and establishes clear procedures for identifying, disclosing, and managing them.

2. Scope

This policy applies to all directors, employees, and contractors of the company.

3. What is a Conflict of Interest?

A conflict of interest arises when an individual's personal interests—financial, professional, or otherwise—could potentially influence, or appear to influence, their professional judgment, decisions, or obligations to the company.


Examples include, but are not limited to:

- **Financial Interests:** Holding a financial interest or ownership stake in a competitor, supplier, or client of the company.
- **Outside Employment:** Working for, consulting for, or providing services to a competitor, vendor, or client while employed by the company.
- **Personal Gain:** Making business decisions, awarding contracts, or hiring personnel that personally benefit the employee, their relatives, or close personal associates.
- **Undisclosed Perks:** Accepting gifts, hospitality, commissions, or payments from suppliers or clients without proper corporate disclosure.
- **Resource Misuse:** Using company property, digital resources, proprietary information, or corporate relationships for personal gain.

4. Employee Obligations

All employees and contractors must strictly adhere to the following duties:

- **Prompt Disclosure:** Disclose any actual, potential, or perceived conflicts of interest in writing to their direct manager or the Human Resources (HR) department.
- **Recusal:** Formally step away and recuse themselves from any decision-making process, evaluation, or negotiation where a conflict exists.
- **Fair Conduct:** Refuse to use their position, title, or authority within the company to unfairly benefit themselves or connected third parties.
- **Annual Compliance:** Complete and submit an annual Conflict of Interest Declaration Form as part of the company's compliance cycle.

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5. Disclosure Procedure

Disclosures must be made as soon as a potential conflict is identified, or when a change in personal circumstances creates one. The employee must submit the official Conflict of Interest Declaration Form. Management and HR will review each submission to evaluate the risk and determine the appropriate course of action.

6. Management of Conflicts

Depending on the severity and nature of the disclosed conflict, management may implement one of the following resolution strategies:

- **Monitor:** Allow the activity to continue under close supervision and strict operational boundaries.
- **Reassign:** Restructure or reassign specific duties and decision-making responsibilities to neutral team members to bypass the conflict.
- **Divestiture:** Require the individual to divest or eliminate the conflicting personal interest (e.g., selling shares or ending outside employment) to maintain their role.
- **Separation:** In serious or irreconcilable cases, terminate the employment or contractor arrangement to protect the company's integrity.

7. Consequences of Non-Disclosure

Transparency is mandatory. Failure to disclose an actual, potential, or perceived conflict of interest—or actively concealing one—constitutes a severe breach of company trust and will result in disciplinary action, up to and including immediate termination of employment.



Approved by: Muhammad Sarfraz, CEO



Integrated Management System (IMS)

Date: 01-01-2026

Document Title:

Anti-Bribery & Corruption Policy

Document Code:

ALQAI SAR-IMS-ABC-01

Rev. No.

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1. Purpose

Al Qaisar Recycling of WEEE LLC maintains a strict, zero-tolerance approach to bribery and corruption. This policy outlines the core responsibilities of our personnel and provides explicit guidance on how to recognize, prevent, and deal with bribery and corruption in all business dealings.

2. Scope

This policy applies globally to all directors, employees, contractors, agents, consultants, and any individuals or entities acting on behalf of or representing the company.

3. What is Bribery & Corruption?

Bribery is the offering, giving, receiving, or soliciting of something of value to improperly influence a business decision or secure an unfair advantage.

Corruption includes, but is not limited to:

- **Improper Benefits:** Offering or accepting cash, gifts, hospitality, or other benefits to gain an illicit business advantage.
- **Facilitation Payments:** Making unofficial payments to government officials to expedite or secure routine, non-discretionary governmental processes.
- **Kickbacks:** Providing or accepting secret percentages or rewards to/from suppliers, clients, or partners in exchange for contracts or favorable treatment.
- **Third-Party Routing:** Utilizing intermediaries, agents, or third parties to channel bribes or circumvent anti-corruption measures on behalf of the company.

4. Gifts & Hospitality

Employees must not offer, give, or accept gifts, hospitality, or other entertainment benefits unless the gesture strictly meets **all** of the following criteria:

- **Proportionate:** It is of reasonable, modest, and token value as defined by company guidelines.
- **Non-Monetary:** It is absolutely **not** cash or a cash equivalent (e.g., gift cards, vouchers).
- **Unconditional:** It is not given, offered, or received in connection with any impending business decision, tender, or contract award.
- **Transparent:** It is openly declared, given without secrecy, and properly recorded in the company's internal register.
- **Compliant:** It fully complies with applicable local laws and specific company guidelines.



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5. Government & Public Officials

- **Direct Prohibitions:** Employees must never offer, promise, give, or authorize the giving of anything of value to a public official, government employee, or state-owned enterprise representative to secure an advantage.
- **Intermediary Conduct:** Employees must not use intermediaries, consultants, or agents to circumvent these rules or make payments on the company's behalf.

6. Due Diligence

Before engaging or signing agreements with third parties (including agents, consultants, distributors, and contractors), the company will conduct appropriate, risk-based **due diligence** to assess the compliance history and corruption risk of the counterparty.

7. Reporting Procedures

Any employee who receives a request for a bribe, suspects corrupt activity, or witnesses a violation of this policy must report it immediately to management or the designated Compliance Officer. All whistleblowers will be protected from retaliation in accordance with the protections outlined in the company's **Anti-Fraud Policy**.

8. Consequences of Non-Compliance

Violations of this policy will be treated with the utmost severity. Non-compliance will result in immediate disciplinary action, up to and including summary dismissal or termination of employment. Furthermore, violations will be reported to the relevant **UAE** authorities for criminal prosecution and legal action in accordance with applicable federal anti-corruption laws.



Approved by: Muhammad Sarfraz, CEO



Integrated Management System (IMS)

Date: 01-01-2026

Document Title:

Anti-Fraud Policy

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ALQAI SAR-IMS-AFP-01

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1. Purpose

Al Qaisar Recycling of WEEE LLC is committed to the highest standards of financial integrity and ethical business conduct. This policy establishes a framework for preventing, detecting, and responding to fraud in all its forms.

2. Scope

This policy applies to all employees, contractors, suppliers, and any third parties who interact with or act on behalf of the company.

3. Definition of Fraud

Fraud includes, but is not limited to:

- **Theft or misappropriation** of company funds, assets, or property.
- **Falsification, forgery, or unauthorized alteration** of financial records or documents.
- **Submission of false invoices**, expense claims, or timesheets.
- **Unauthorized access** to or misuse of company systems, data, or records.
- **Deceptive conduct** intended to obtain financial gain.
- **Collusion** with external parties to defraud the company or its clients.

4. Responsibilities

- **Management:** Implement effective financial controls and fraud prevention systems.
- **All Employees:** Report any suspected fraudulent activity without fear of retaliation.
- **Finance Department:** Maintain accurate records and perform regular reconciliations.
- **Internal Auditors:** Conduct periodic audits to identify irregularities.

5. Reporting Procedures

Any employee who suspects or witnesses fraudulent activity must:

- Report immediately to their direct manager or senior management.
- Alternatively, report confidentially to the CEO or a designated compliance officer.
- Preserve all relevant evidence and documentation.
- **Not** conduct independent investigations or confront the suspected individual.

6. Investigation

All fraud reports will be treated seriously and investigated promptly and confidentially. Where fraud is confirmed, the company will take appropriate disciplinary and/or legal action, including reporting to UAE authorities where required.



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7. Whistleblower Protection

Employees who report fraud in good faith are protected from retaliation. Any form of retaliation against a whistleblower will be treated as a serious disciplinary violation.

8. Disciplinary Consequences

Employees found to have committed fraud will face immediate disciplinary action, up to and including termination of employment and legal action in accordance with applicable UAE laws and regulations.



Approved by: Muhammad Saffraz, CEO