

SUSTAINABILITY POLICY STATEMENT

At Tom Martin & Company Limited, we recognise our responsibility to contribute to the environment, society and the economy in a positive manner and understand that effective management of this is of key importance to the sustained success of our business.

As a leading metal recycling business, we are committed to conducting our operations with the highest possible standards of sustainability, and to a further extent supporting the transition to a more sustainable metals recycling industry.

This policy outlines the commitments we make to environmental stewardship, social responsibility, and to ethical business practices throughout Tom Martin & Company's UK operations.

The materiality assessment undertaken as part of the development of this policy was aligned with GRI standards, which are the World's most widely adopted sustainability reporting standards.

Environmental responsibility

We are committed to fulfilling our share of the responsibility to become net zero by 2050 by reducing the greenhouse gas emissions associated with our operations and transportation, and we will:

- Optimise resources entering into the operations, retaining them at their highest value and therefore reducing demand for virgin materials, as well as driving the transition to a circular economy.
- Reduce energy consumption and pursue electrification options across our operations and invest in low-carbon technologies.
- Support the transition towards electric vehicles (EVs) or the use of sustainable fuels to reduce the impact of transportation.

Social responsibility

We will ensure that Tom Martin & Company Limited is a safe and healthy place to work for our employees, and we expect our whole value chain to uphold the same standard. We will:

- Prioritise the health and safety of our employees, aiming to develop a safety-first culture through regular training, hazard assessments, and the provision of necessary protective equipment if hazards cannot be removed or separated.
- Strengthen our due diligence processes to encourage fair labour practices, responsible sourcing of materials and to ensure compliance with human rights practices globally.

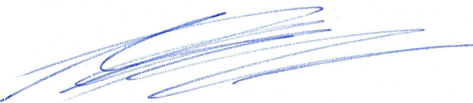
Governance responsibility

We are continually working to embed strong governance throughout the business, we strive to actively demonstrate the sustainable action that we are undertaking and ensure compliance with all regulations and ESG disclosure obligations. We will:

- Maintain transparency in our operations by providing stakeholders with accurate and timely information regarding our sustainability performance.
- Regularly monitor our sustainability performance, set measurable targets, and report progress to our stakeholders.

Our commitment to sustainability is not just a policy; it is a pledge to positively impact our environment, society and economy. We invite and encourage all stakeholders to support and assist us in our sustainability journey to ensure that our commitments are effectively implemented and have meaningful impacts. We shall periodically review and, as necessary, update this policy to ensure it's continuing alignment with evolving industry standards and best practices.

SIGNED:



Mark Perkins (Managing Director)

02/03/2026