CTR Group
Supplier Code of Conduct Summary

Overview
CTR Group is a UK-based organization specializing in sustainable reuse, recycling, and recommerce solutions. Operating across textiles, books, consumer goods, and plastics, we deliver environmental compliance, circular economy innovation, and responsible waste management for retailers, charities, and customers throughout the UK and Europe. Through our partnership with Thrift+, we extend our commitment to sustainable textile reuse and recommerce solutions.
As a responsible business committed to sustainability, ethical conduct, and compliance, CTR Group expects the same standards from our suppliers and business partners.

Purpose & Scope
This Code of Conduct applies to all suppliers providing goods or services to CTR Group entities, including contractors, consultants, logistics providers, agents, intermediaries, and subcontractors. Requirements are risk-based, with enhanced scrutiny for high-risk suppliers based on spend value, geographic location, industry sector, and product category.

Core Principles

1. Legal Compliance
Suppliers must comply with all applicable laws and regulations, maintain necessary licenses and permits, and cooperate with regulatory authorities across all areas including employment, environmental, health and safety, anti-bribery, data protection, and trade compliance.

2. Ethical Conduct & Governance
We require honest and transparent business practices with zero tolerance for bribery, corruption, fraud, conflicts of interest, and anti-competitive behaviour. Suppliers must implement robust financial controls, accurate record-keeping, and provide whistleblowing mechanisms without fear of retaliation.

3. Labour & Human Rights
CTR Group upholds fundamental human rights aligned with the Universal Declaration of Human Rights and ILO Core Conventions. We have **zero tolerance** for child labour, forced labour, modern slavery, discrimination, and harassment. Suppliers must provide fair wages, reasonable working hours (maximum 48 hours regular plus 12 hours voluntary overtime), transparent contracts, and respect workers' rights to freedom of association.

4. Health & Safety
Suppliers must provide safe working environments, conduct regular risk assessments, provide appropriate PPE and training, maintain emergency preparedness plans, and implement management systems aligned with ISO 45001 standards.

5. Environmental Responsibility
We expect suppliers to minimize environmental impacts through reduced energy consumption, water use, waste generation, and greenhouse gas emissions. Suppliers should implement environmental management systems (ISO 14001), prevent pollution, manage hazardous materials responsibly, and support circular economy principles through reuse and recycling.

6. Data Protection & Information Security
Suppliers must comply with UK GDPR and Data Protection Act 2018, implement appropriate security controls, protect confidential information, respect intellectual property rights, and report data breaches to CTR Group within 24 hours.

7. Supply Chain Responsibility
Suppliers must cascade CTR Group's standards throughout their own supply chains, conduct due diligence on their suppliers, maintain traceability (particularly for high-risk materials), and ensure responsible sourcing including conflict minerals.

8. Continuous Improvement
We expect commitment to ongoing improvement in sustainability and ethical performance through setting objectives, monitoring KPIs, transparent reporting, and collaborative improvement initiatives.

Assessment & Compliance

Risk-Based Approach
Suppliers are categorized as High, Medium, or Low Risk based on assessment. High-risk suppliers undergo enhanced due diligence and monitoring.

Verification Rights
CTR Group reserves the right to request documentation, conduct on-site or remote audits (typically with 30 days notice), engage third-party auditors, and require corrective action plans for non-compliances.

Consequences of Non-Compliance

- **Minor**: Corrective action plan (30-90 days)
- **Moderate**: Formal remediation plan, enhanced monitoring, potential business restrictions
- **Serious**: Immediate suspension, mandatory independent audit at supplier expense, potential termination
- **Zero Tolerance Violations**: Immediate contract termination, potential legal action, reporting to authorities (applies to child labour, forced labour, modern slavery, human trafficking, serious health and safety violations, deliberate environmental damage, bribery, corruption, fraud, and severe data breaches)

Contact
For questions about this Code of Conduct or CTR Group's supplier requirements:
Email: info@ctrgroup.com