

# Anti-Corruption Policy

## Principle

At Thalia Waste Management we believe that conducting our business honestly and to high ethical standards, thereby maintaining public confidence in the integrity and corporate legitimacy of our operations, is essential for our long-term success and growth. We also believe that it is essential to conduct our operations in full compliance with the law and to ensure that our business dealings with Employees, business partners, suppliers and customers are conducted professionally, fairly and with integrity in a corruption-free environment.

We do NOT permit or condone any acts of corruption and bribery, in any of our dealings or in the dealings of our Employees, joint venture partners, suppliers or agents acting on its behalf.

The purpose of this policy is to:

1. Set out our responsibilities (including the responsibilities of our Employees, suppliers, joint venture partners and agents) in observing and upholding its position on bribery and corruption;
2. Set out the measures to be taken to: -
  - Prevent corruption and bribery by having adequate anti-corruption procedures;
  - To monitor and identify any instances of corruption and bribery or attempted corruption and bribery;
  - To respond appropriately if corruption and bribery is uncovered; and
3. Provide information and guidance to those working for and with us on how to recognise and deal with bribery and corruption.

This policy is to be read in conjunction with Thalia Waste Management's other policies listed below.

**We operate a ZERO-Tolerance approach to any breach of this policy.**

## Prohibited Acts

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage and includes (inter alia):-

- Offering a bribe (even if the offer is rejected);
- Receiving a bribe (including offering to receive a bribe)
- Bribing a public official.

Bribery is illegal in the UK and acts of bribery are prohibited irrespective if they take place in the UK or elsewhere in the world.

Corruption is the misuse of a position of power for personal gain.

## Coverage

This policy applies to all Employees - individuals working at all levels and grades, including (but not limited to) senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff, volunteers, interns, agents, sponsors or any other person associated with Thalia Waste Management (collectively referred to as “Employees” in this policy).

This policy shall also be complied with by our advisers and agents and any suppliers used by us.

## Your Responsibilities

People managers are responsible for implementing this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us. All Employees, suppliers, joint venture partners, advisers and agents are required to comply fully with this policy.

Any Employee who breaches this policy will face disciplinary action that could result in dismissal for gross misconduct. Any suppliers, agents, advisers and joint venture partners who breach this policy may (inter alia) have their contracts terminated.

We reserve the right to report any allegations of bribery and corruption to the relevant police authority for investigation and, if appropriate, prosecution.

## Reporting

We encourage the early reporting of concerns or suspicions of behaviour that may be in breach of this policy. Concerns should be raised with a people manager (if appropriate) or by following the procedure set out in the Whistleblowing Policy.

SILENCE IS CONSENT

## Communication and Training

The policy will be communicated at regular intervals, using a range of appropriate media and providing opportunities for questions and concerns to be fully addressed. The policy will also be communicated to other stakeholders, including customers, suppliers and business partners, as opportunity or the need arise.

## Executive Committee

The Executive Committee shall monitor compliance with the policy across all group functions and sites, ensure that best practise is shared, and that support and operational procedures are in place, maintained and audited.

## Implementation

The Chief Executive Officer is responsible for the implementation of this policy and other related policies and procedure, including the communication and detailed interpretation, monitoring and any disciplinary action in response to an apparent breach of this policy. The General Counsel is responsible for maintaining and reviewing this policy, and for clarifying and resolving general issues. The General Counsel will oversee any audit of policy compliance on behalf of the Chief Executive Officer, which may be considered necessary.

The Chief Executive Officer shall update the Board on at least an annual basis on compliance with this policy.

Line management is responsible for implementation of this policy.

This policy should be read in conjunction with a number of other a Thalia Waste Management policies on related matters, including but not limited to:-

- Anti-Fraud Policy
- Gifts and Hospitality Policy
- Recruitment and Selection Policy
- Disciplinary Policy
- Whistleblowing Policy



Paco Hevia  
 Chief Executive

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### Revision Status

Revision	Date	Amendment	Content Owner	Mandated By
1.0	Nov 22	Issued for use	Janet McDonald	Paco Hevia