

# Anti-Fraud Policy

## Principle

At Thalia Waste Management we are committed to the prevention of fraud and the promotion of an anti-fraud culture. We recognise that corrupt business practices can seriously undermine our reputation and shareholder value and pose a serious risk to the longer-term sustainability of our business.

**We have a zero-tolerance approach to fraud** and require all employees to act honestly and with integrity at all times and to report all reasonable suspicions of fraud.

We will investigate all instances of actual, attempted and suspected fraud committed by employees or third parties providing services to us and will seek to recover funds and assets lost through fraud. Perpetrators will be subject to disciplinary and/or legal action and may be reported to the police.

This policy is endorsed and supported by the Thalia Waste Management Executive Committee.

## Approach

We seek to limit our exposure to fraudulent practices through:

- Setting out a clear anti-fraud policy
- Ensuring that employees are aware of actions that may constitute fraud
- Encouraging employees to be vigilant and to report any suspicions of fraud, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
- Rigorously investigating instances of alleged fraud and assisting the police and other appropriate authorities in any resultant prosecution
- Taking firm and vigorous action against any party involved in fraud.

## Definitions

The term “fraud” is commonly used to describe a number of activities but essentially it is the use of deception or dishonesty to deprive, disadvantage, cause loss to a person or party or create advantage or benefit to another. This can include obtaining or taking property by deception, the misuse of funds or other resources or more complicated crimes such as false accounting and the supply of false information. Some examples of fraud are:-

- Stealing cash (or failing to properly report it where required to do so), or property (such as small tools, scrap material or office supplies)
- Falsifying, concealing or destroying records or documents such as timesheets, inspection records, delivery receipts, etc.
- Receiving personal payments or other benefits from suppliers or other parties
- Misuse of company Pcards, fuel cards or procurement facilities
- Disclosing confidential or proprietary information to outside parties

- Making a false, misleading or deceptive representation, report, account or document including false reporting and false accounting
- Tax evasion or facilitation of tax evasion
- Allowing Thalia Waste Management employees, assets and systems to be used in order to defraud Thalia Waste Management or other parties (including clients, suppliers and subcontractors)
- Failure to disclose any of the above activities.

Attempted fraud and conspiring with others to commit fraud will be treated in the same way as actual fraud under this policy.

This policy covers any fraud that could potentially affect our operations irrespective of whether committed by:

- Employees (as defined below and including full, part time and temporary employees, consultants, contractors, agency workers)
- Suppliers and sub-contractors including consultants, advisers, lobbyists, agents or other business partners;
- Customers or clients; or
- Members of the public.

If a person is in any doubt as to whether an act constitutes fraud they should seek the advice of the General Counsel.

If anyone has a suspicion that fraud has taken or is about to take place, they must report the incident via the whistleblowing procedure set out in the Whistleblowing Policy. Staff or managers should not attempt to investigate any allegations of fraud themselves but must refer matters to the General Counsel via the Whistleblowing Helpline.

## Coverage

This policy applies to all 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, temporary 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 all our advisers and agents and all suppliers and sub- contractors used by us.

## Your Responsibilities

The prevention, detection and reporting of fraud are the responsibility of all those working for us whether as employees, suppliers or otherwise.

Any employee who breaches this policy will face disciplinary action that could result in dismissal for gross misconduct. Any suppliers, agents, advisers and other third-party contractor or customer who breach this policy may (inter alia) have their contracts terminated.

We reserve the right to report any allegations of fraud to the relevant police or other regulatory authority, and any other interested parties for investigation and, if appropriate, prosecution.

We may seek to recover any losses we have suffered as a result of fraud from the people or parties involved.

## Reporting

The prevention, detection and reporting of fraud is the responsibility of all our employees and business partners. Employees are responsible for:

- Ensuring that our reputation and assets are protected against fraud
- Reporting known or suspected fraud
- Assisting in the investigation of suspected fraud

Business partners should notify us when they become aware of any fraudulent or alleged fraudulent activity involving us and must co-operate in any investigation by us into such activities.

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 contacting the independent Whistleblowing Helpline.

Any concerns raised to people managers must not be investigated by them but must be passed to the General Counsel who will instruct an inspection to be carried out under the Whistleblowing Policy.

## 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.

## Implementation

The Chief Executive Officer is responsible for the implementation of this policy across Thalia Waste Management including the communication and detailed interpretation, monitoring and any 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 and reporting of investigations undertaken.

The Chief Financial Officer will ensure that appropriate internal processes are put in place to prevent fraud and 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 communication and implementation of this policy to employees and all other affected parties.

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

- Anti-Corruption Policy
- Gifts and Hospitality Policy
- Whistleblowing Policy



Paco Hevia  
 Chief Executive  
 Officer

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## Revision Status

Revision	Date	Amendment	Content Owner	Mandated By
1.0	Nov 22	Issued for use	Janet McDonald	Paco Hevia
2.0	Oct 24	Technical amendments including definitions	Jonathan Reuben	Paco Hevia