Thalia
Waste Management

Anti Corruption Policy

July 2026

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 and business partners 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, sub-contractors, consultants, advisers, lobbyists or agents or other business partners acting for or on our behalf or of our customers. For the purpose of this policy "**business partners**" include reference to any joint venture partner, supplier, sub-contractor, consultant, adviser, lobbyist or agent or other business partner acting for and, on our behalf, together with our clients and customers.

The purpose of this policy is to:

1. Set out our responsibilities (including the responsibilities of our Employees and business partners) in observing and upholding its position on bribery and corruption, including the Bribery Act 2010 and the offences of offering, promising or giving a bribe, requesting, agreeing to receive or accepting a bribe, bribing a foreign public official, and the corporate offence of failure to prevent bribery;

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); and
- 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.
Thalia Waste Management does not permit facilitation payments. Facilitation payments are unofficial payments, however small, made to secure or speed up the performance of a routine or necessary action by a public official or other third party. Employees and business partners must not make, offer, promise, request, authorise or accept any facilitation payment, whether directly or indirectly and whether in the UK or overseas.

If an Employee is asked to make a facilitation payment, or believes that a facilitation payment has been requested or made on Thalia Waste Management's behalf, this must be reported promptly in accordance with the Reporting section of this policy. Gifts, hospitality, charitable donations, sponsorships and any other benefits must never be offered, promised, given, requested or accepted where they are intended, or could reasonably be perceived, to improperly influence a business decision, secure an improper advantage, reward improper performance, or compromise the independence or integrity of Thalia Waste Management, its employees or its business partners.

All gifts and hospitality must be reasonable, proportionate, transparent, properly recorded and approved in accordance with Thalia Waste Management's Gifts and Hospitality Policy. Particular care must be taken when dealing with public officials, customers, suppliers, prospective suppliers, regulators or any person involved in a tender, procurement, contract award, contract management or regulatory process. Political donations must not be made on behalf of Thalia Waste Management unless expressly authorised in accordance with applicable law and Thalia Waste Management's internal approval procedures. Charitable donations and sponsorships must not be used as a means of obtaining an improper business advantage or circumventing this policy.

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 and on behalf of us. All Employees and business partners 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 other business partners who breach this policy may (inter alia) have their contracts suspended or terminated.

We reserve the right to report any allegations of bribery and corruption to the relevant police authority, regulator or other competent 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 or any other similar communication channel that is available.

SILENCE IS CONSENT

Reporting

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 this policy across all group functions and sites, review the effectiveness of related controls and procedures, ensure that best practice 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 procedures, 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 Thalia Waste Management policies on related matters, including but not limited to:

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

Paco Hevia
Chief Executive Officer

August 2026

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 to the definition of business partners	Jonathan Reuben	Paco Hevia
3.0	July 26	Review and consequential updates including to prohibited acts.	Janet McDonald	Paco Hevia

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