Thalia
Waste Management

Anti-slavery & Human Trafficking Policy

August 2026

Anti-slavery & Human Trafficking Policy

About this policy

The purpose of this policy is to:

- Set out our responsibilities in observing and upholding our position on modern slavery and human trafficking; and
- Provide information on how to identify and report concerns regarding modern slavery and human trafficking

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Principle

Modern slavery is a violation of fundamental human rights and a criminal offence under the Modern Slavery Act 2015 (the "Act"). It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Act.

We adopt a risk-based approach to identifying, assessing and managing modern slavery risks across our operations, procurement activities and supply chains, focusing resources on those areas presenting the greatest risk of exploitation.

We expect the same high standards from all of our contractors, suppliers and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect our suppliers to hold their own suppliers to the same high standards.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we implement the following measures:

- Conduct regular risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;

- Engage with our suppliers both to convey to them our Anti-Slavery and Human Trafficking Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses and their supply chain;

- Undertake proportionate risk-based due diligence on suppliers and contractors, including prequalification assessments, supplier onboarding checks, periodic reassessment of exposures and such additional due diligence as may be required for higher-risk suppliers, sectors or geographies;

- Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion

Responsibilities

The overall responsibility for this policy lies with the Chief Executive, but this policy can only be modified by formal agreement of the Executive Committee.
All members of the Executive Committee have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Your responsibilities and how to raise a concern

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

If you believe or suspect that a breach of this policy has occurred or that it may occur you must report it to your People Manager or to the Whistleblowing Helpline on 0800 047 4037,as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give

support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your People Manager or through the Whistleblowing Helpline.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Training and communication

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and training will be provided as necessary.

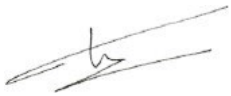
Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

Breaches of this policy

If an issue is identified with a supplier, we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon time period.

Where modern slavery is identified, we will seek to ensure that affected individuals are safeguarded and that remedial action is taken proportionately and responsibly. Remediation may include engagement with suppliers, corrective action plans, enhanced monitoring, referral to appropriate authorities or support organisations and, where necessary, termination of commercial relationships.
Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



Paco Hevia
Chief Executive Officer

August 2026

Revision Status

Revision	Date	Amendment	Content Owner	Mandated By
1.0	Nov 22	Issued for use	Janet McDonald	Paco Hevia
2.0	Aug 25	Review – no revision to content	Jonathan Reuben	Paco Hevia
3.0	Aug 26	Review and update to align with Thalia Waste Management's compliance framework, supplier due diligence processes and current modern slavery governance requirements	Janet McDonald	Paco Hevia

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