Thalia
Waste Management

Gifts & Hospitality Policy

July 2026

Gifts & Hospitality Policy

Principle

Thalia Waste Management believes that conducting its business to high ethical standards, thereby maintaining public confidence in the integrity and corporate legitimacy of its operations, is essential for its long-term success and growth. We also believe that it is essential to conduct our operations in a transparent manner, in full compliance with the law and to ensure that our employees, business partners, suppliers and customers operate in a corruption-free environment.

Gifts from suppliers, customers or partners may give an appearance of dishonest or unfair dealings. We do not permit or condone acts which amount to bribery or which attempt to illegally influence another person's or your own behaviour. Gifts and hospitality must not be used, or permitted to be used, to facilitate, conceal, reward or contribute to fraud, dishonest conduct or the circumvention of Thalia Waste Management's internal controls.

This policy does not prohibit providing or receiving gifts and hospitality if such gifts and hospitality are provided and received in compliance with this policy.

Within this policy the term 'Gifts and Hospitality' includes tangible and intangible gifts of any kind including (but not exclusively): payment, services, accommodation, invitations to restaurants, tickets, events, travel expenses, discounts for personal purchases or any other kind of gift or favour.

This policy forms part of Thalia Waste Management's wider anti-bribery, anti-corruption, anti-fraud, business ethics, conflicts of interest and internal controls framework.

Thalia Waste Management operates a ZERO-tolerance approach to any breach of this policy

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, volunteers, interns, agents, sponsors or any other person associated with Thalia Waste Management (collectively referred to as "employees" in this policy).

The policy also applies to the employees of any entity where Thalia Waste Management has control, being any entity where we have a majority vote on the Board of Directors or other administrative body as applicable.

All employees are also subject to industry standards and the laws of the countries in which they work. Any such industry standard or local law that is more stringent will take precedence over the provisions herein.

This policy shall also apply to our advisers and agents and any subcontractors or suppliers we use and to any person performing services for or on behalf of Thalia Waste Management, including associated persons, and we expect that they will adopt and maintain appropriate controls and take the steps necessary to comply with the spirit of this policy.

Your Responsibilities

It is the responsibility of each employee to read, understand and comply with this policy and to ensure that their close relatives do not solicit gifts or hospitality from clients, suppliers or partners. Each employee shall declare any actual, potential or perceived conflict of interest connected with any gift or hospitality. Ignorance of this policy does not excuse non-compliance.

Any person who breaches this policy will face disciplinary action that could result in dismissal for gross misconduct. Any suppliers, agents, advisers and business partners who breach this policy may, among others, have their contracts terminated.

Thalia Waste Management reserves the right to report any breaches of this policy which may amount to bribery and corruption to the relevant police authority for investigation and, if appropriate, prosecution.

We encourage the early reporting of concerns or suspicions of behaviour that may be in breach of this policy. Concerns should be raised with People Manager(s) (if appropriate), the legal team, the General Counsel or by reporting it to the Whistleblowing Helpline 0800 047 4037 or any other approved internal reporting channel.

People Managers are required to ensure compliance with the policy and to monitor and review the activities of their reports. Any suspicious activity must be reported to a senior manager (if appropriate) or by following the procedure set out in the Whistleblowing Policy.

Prohibited Gifts & Hospitality

It is not acceptable to:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;

- Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;

- Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;

- Solicit or accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;

- Solicit or accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by Thalia Waste Management in return;

- Give, promise to give, or offer, a payment, gift or hospitality or accept a gift or hospitality from another party during a procurement process (including any competitive or non-competitive procurement, acquisition or bidding process) where that other party is involved in any way in that procurement process, unless the relevant Group Function Head or Chief Executive Officer, as applicable, has given their prior approval to such gift or hospitality;

- Threaten or retaliate against another worker who has refused to be complicit in activities in breach of this policy; or

- Engage in any activity that might lead to a breach of this policy

When an employee maintains a personal relationship with customers, suppliers or vendors of Thalia Waste Management, they may not obtain discounts or more favourable conditions for themself, spouse, unmarried partner or relative in respect of any purchase or service provided, than those offered to other employees.

Acceptable Gifts & Hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. The giving or receipt of gifts and hospitality is not prohibited if in all the circumstances, the gift or hospitality given or received is reasonable and justified and, if the following requirements are all met:

- It is not made or accepted with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;

- It complies with local law;

- It is given or received in the name of and on behalf of Thalia Waste Management;

- It is for an identifiable and legitimate business purpose;
- It does not include cash or a cash equivalent (such as gift certificates or vouchers);
- It is appropriate in the circumstances;
- Taking into account the reason for the gift or hospitality, it is of an appropriate type and value and given or received at an appropriate time;
- It is given or received openly, not secretly; and
- It does not expose Thalia Waste Management to civil or criminal liability

If there is any doubt as the appropriateness of a gift of hospitality, employees should consult their people manager and the Thalia Waste Management General Counsel in writing.

Approval

Offering gifts of hospitality:

All gifts and hospitality expenses must be approved according to the Expenses Policy/procedure applicable to the employee. Also, when the expense exceeds the value of £50 per person the employee shall seek written permission (which may be by email) from their Group Function Head or Chief Executive Officer, as applicable, prior to the expense being incurred. The employee may seek approval of values less than that above if they wish. Any request for approval shall contain the amount and circumstance of the expenditure to be incurred. Any subsequent approval shall also be in writing (which may be by email). All expenditure will also require any additional approval required by the Travel and Expenses Policy and the General Authorities Schedule. Under no circumstances will any approved value be exceeded.

Being offered gifts or hospitality:

Acceptable Gifts & Hospitality

All gifts and hospitality offered to you must be declared to your Group Function Head or Chief Executive Officer, as applicable, and/ or if the value, or estimated value, exceeds £50 then approval to receiving the gift or hospitality must be obtained.

Please complete this **form** for both of the above approvals / declarations. Personal data collected in connection with gifts and hospitality declarations, approvals, registers and expense records will be processed in accordance with applicable data protection laws and Thalia Waste Management's privacy notices and data protection policies.

Communication & Training

This policy is published on the Thalia Waste Management website and is reviewed periodically. It is communicated at 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 arises.

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

- Anti-corruption Policy
- Anti-fraud policy
- Business Ethics Policy
- Data Protection Policy
- Disciplinary Policy
- Expenses Policy
- Procurement Supply Chain Policy
- Whistleblowing Policy and Procedure

Paco Hevia
Chief Executive Officer

July 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 to change approver and clarify criteria for the giving and receiving of gifts and hospitality during a procurement process.	Jonathan Reuben	Paco Hevia
3.0	July 26	Amended to align with governance framework, including enhanced references to internal controls, reporting channels, data protection and related policy controls.	Janet McDonald	Paco Hevia

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