Thalia
Waste Management

Intellectual Property Policy

July 2026

Intellectual Property Policy

Principle

We recognise that the quality of service and product we deliver will be considerably improved by continued innovation in our business practices and technology and by the know-how and creativity of our people and business partners. While we will seek to adopt the best of appropriate technology and practice from outside our business, by learning, acquisition and licensing, it is also our aim to invent and develop as much as possible within our business and protect it where necessary.

We will ensure that, through effective management of our intellectual property, we hold legitimate rights to employ and exploit the full potential of the technologies and related assets on which the business will depend in the future. Intellectual Property (IP) refers to all our knowledge-based assets, including patents, copyright, design rights, registered and industrial designs, trademarks, trade secrets, confidential information, software, source code, algorithms, data sets, business methods, technical information, licenses, know-how and rights in or to inventions, improvements and innovations , as well as the collective experience and creativity of all our people and, where applicable, our contractors, consultants and business partners.

We will identify, develop and, as necessary, protect by various means our portfolio of intellectual property, managing it to the benefit of our customers and other stakeholders. It is also our intention to respect the IP rights of other organisations and individuals and comply with licence conditions where relevant.

In particular, it is our policy to:

- Recognise the value of IP as a core asset of our business
- Stimulate and support a climate of innovation by encouraging the pursuit of new ideas and encourage the development of a broad range of IP in all our activities.
- Encourage ideas and suggestions from all our people or from outside sources which could create valuable intellectual property, together with an awareness of the principles governing its protection.
- Work with our customers to identify areas where investment in new technology or ideas will bring long term advantages to us, them and the industry as a whole.
- Make appropriate arrangements for the identification, protection and exploitation of our IP. Where it is concluded that such intellectual property cannot lead to competitive advantage, it will be offered to other organisations on terms acceptable to Thalia Waste Management.

- Manage our IP, employing best-accepted practice and encourage the sharing of ideas across our accounts

- Legally protect our IP, with assistance from legal advisers where necessary, through registration via the relevant body (e.g. the UK Intellectual Property Office) in the relevant jurisdictions and maintain these registered rights where necessary in order to protect them against unlawful use and infringements by third parties.

- License or dispose for value to external parties those items of intellectual property to which Thalia Waste Management no longer requires exclusive rights.

- Take appropriate, proportionate and legally approved action in respect of any infringement by others of our legitimate IP rights, including any rights protected by registration, which may include litigation where necessary and approved by the relevant internal procedure.

- Maintain the confidentiality of commercially valuable information including trade secrets, know-how, business plans, bid materials, technical information, software, algorithms, data sets, operational information, customer and supplier information, financial information and other confidential or commercially sensitive information. Such information must be protected through appropriate access controls, secure storage, labelling, need-to-know disclosure and contractual confidentiality obligations.

- Comply with the provisions of all agreements to which Thalia Waste Management is a party, which govern the transfer and/or use of know-how or licensing of IP, including non-disclosure agreements, data sharing agreements, software licences, technology agreements, consultancy agreements, supplier contracts, collaboration agreements and any group requirements relating to third-party integrity, data protection and information security.

- Ensure that appropriate technical skills are retained and fostered by an active programme of recruitment, training and continuing development.

- Ensure that artificial intelligence tools, automated systems and other digital technologies are used responsibly and only in accordance with applicable law, Thalia Waste Management's policies, contractual restrictions and internal approvals. Confidential information, personal data, trade secrets, proprietary materials, unpublished documents, third-party copyright materials or commercially sensitive information must not be entered into public or unauthorised AI tools.

- Ensure that IP created by employees in the course of their employment, or using Thalia Waste Management's resources, confidential information, systems or business opportunities, is identified and protected for the benefit of the relevant Thalia Waste Management al group company. Appropriate assignment, licence, confidentiality and moral rights provisions must be included in contracts with contractors, consultants, suppliers and business partners before work commences.

- Apply appropriate controls to prevent fraud, conflicts of interest, improper personal gain, unauthorised licensing, undervaluation, misappropriation or misuse of IP assets, including when procuring, licensing, disposing of, valuing or commercially exploiting IP.

Responsibilities

Our General Counsel along with our legal team are responsible for interpreting and monitoring implementation of this policy and for reviewing its provisions at regular intervals and following material legislative, regulatory or technological developments. The General Counsel will also, where appropriate, provide access for line management to a source of specialist expertise on legal and related issues associated with the external registration and protection of intellectual property of all types.

Our People and Communications Director is responsible for the protection of intellectual property developed by employees and will provide guidance on recruitment, training and continuing development including appropriate awareness and training on confidentiality, responsible use of AI tools, data protection, third-party rights, open-source software, and the protection and reporting of IP-related risks.

Each of our Account Directors will ensure that suspected IP infringement, unauthorised disclosure, misuse of confidential information, licence breach, fraud, theft, cyber incident or other IP-related concern is escalated promptly to the legal team and, where appropriate, the relevant reporting channel:

- Prepare and regularly review procedures consistent with this policy and will take responsibility for its implementation;

- Prepare a register of IP, which the site will seek to protect by a variety of means, through consultation with the legal team if necessary;

- Be responsible for promulgating the policy, promoting a climate of innovation and for implementing its provisions, including external registration, development and exploitation of IP assets; and

- Report periodically to the Chief Executive Officer on development and exploitation of the IP portfolio

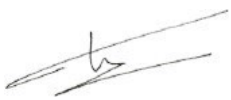
The Executive Committee will provide the focus for high-level review of technical development programmes, for encouraging inter-site co-operation, and for ensuring that the level of investment in IP is appropriate and consistent with business strategy and with applicable legal, regulatory, compliance, data protection, information security and group requirements. The Executive Committee will also consider technical trends and major advances of particular significance to Thalia Waste Management and will overview the provision of technical training and education programmes across the group. These matters will be formally reviewed at least annually.

Communication

This policy will be brought to the attention of everyone within Thalia Waste Management and, as appropriate, to external interests including suppliers, business partners and clients.

Any person who becomes aware of a suspected breach of this policy, including suspected infringement, unauthorised disclosure, misuse of confidential information, breach of licence terms, fraud, theft or unethical conduct involving IP, should report the matter promptly through their line manager, the Legal team, as appropriate.

This policy should be read in conjunction with a number of other Thalia Waste Management policies on related matters including policies and procedures relating to compliance, anti-corruption, fraud prevention, whistleblowing, data protection, information security, cyber security, records management, procurement, gifts and hospitality and use of IT systems.



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	Jonathan Reuben	Paco Hevia
3.0	July 26	Amendments to incorporate data protection developments, AI/copyright risks, fraud prevention controls, open-source/licence compliance and strengthened confidentiality and trade secret protections	Janet McDonald	Paco Hevia

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