



# Anti-corruption Policy

## Scope of application

This Policy is applicable to all employees, managers and members of the governing bodies of FCC WASTE MANAGEMENT LTD, its subsidiaries and holdings/joint ventures in which FCC WASTE MANAGEMENT LTD is the majority shareholder / partner or where control is held by FCC WASTE MANAGEMENT LTD's management ("FCC WASTE MANAGEMENT LTD" or "the Company"). It is the responsibility of all FCC WASTE MANAGEMENT LTD employees to act professionally and protect the Company's reputation.

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**1. General statement**

FCC Waste Management Ltd, its subsidiaries and affiliate companies (collectively, FCC Waste Management Ltd) has a number of fundamental principles and values which it believes are the foundation of sound and fair business practice. One such principle is a zero tolerance approach to bribery and corruption and to act professionally, fairly and with integrity in all our business dealings and relationships.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

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

This policy should be read in conjunction with the Corporate Anti-corruption Policy of FCC Waste Management Ltd S.A. and the Corporate Code of Conduct (available on the Intranet). If there is an inconsistency between any of the provisions of this policy and the Corporate Anti-corruption Policy of FCC Waste Management Ltd S.A., then the provisions of the Corporate Anti-corruption Policy of FCC Waste Management Ltd S.A. shall prevail.

**2. Legal obligations**

It is FCC Waste Management Ltd’s policy to comply with all laws, rules and regulations governing anti-corruption and bribery in all countries in which FCC Waste Management Ltd operates.

Under UK law, bribery and corruption is punishable for individuals by up to ten years imprisonment, and if FCC Waste Management Ltd is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for Government contracts and face untold damage to its reputation.

A bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the aware of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting or seeking a bribe.

**3. Policy**

This policy applies to individual employees, agents, sponsors, intermediaries, consultants or any other people or bodies associated with FCC Waste Management Ltd or any of its affiliates and their employees.

All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your Line Manager or a member of the Legal Department. Specifically, you must not:

- (a) give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- (b) accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
- (c) give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure.

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.

A gift of hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers), or be given in secret. Gifts must be given in the name of FCC Waste Management Ltd, not your own.

Promotional gifts of low value such as branded stationary may be given to or accepted from existing customers, suppliers and business partners.

#### 4. Expectations of FCC Waste Management Ltd and staff

You must declare and keep a written record of all hospitality or gifts given or received. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our Employee Expenses Policy and record the reason for expenditure.

All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept “off-book” to facilitate or conceal improper payments.

The prevention, detection and reporting of bribery and corruption is the responsibility of all employees of FCC Waste Management Ltd. Employees or others who wish to report any suspicion of bribery may do so confidentially in accordance with FCC Waste Management Ltd’s Whistleblowing Policy

#### 5. Further guidance

Inevitably, decisions as to what is acceptable may not always be easy, particularly in the absence of minimum legal standards or where they are poorly enforced. If anyone is in doubt as to whether a potential act constitutes bribery/corruption, the matter should be referred to their immediate Line Manager, supervisor or the Legal Department