



PriorityWaste[®]

Your waste is our priority

Priority Waste – Anti-Bribery and Corruption Policy

Version: 2.0

Effective Date: 28 October 2025

Department: Compliance / Operations

Approved By: Nikolay Tovirov – Operations Director

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1. Purpose

1.1 Priority Waste Limited (“the Company”) is committed to responsible, transparent, and ethical business conduct. We comply with all relevant legislation, including the **Bribery Act 2010**, the **Procurement Act 2023**, and the **Economic Crime and Corporate Transparency Act 2023**.

1.2 The Company adopts a **zero-tolerance approach** to all forms of bribery and corruption. We will never offer, give, solicit, or accept any bribe or improper inducement, directly or indirectly, and we expect the same from everyone acting on our behalf.

2. Definition of Bribery

2.1 A **bribe** is any financial or other advantage offered, given, requested, or accepted with the intention of influencing the recipient to perform a function improperly or to reward them for doing so.

2.2 Bribery also includes the requesting or agreeing to receive an advantage that results in, or is intended to result in, improper performance.

2.3 Bribery of a foreign public official occurs when an advantage is offered to influence the official in their official capacity to obtain or retain business, except where local law specifically permits such influence.

3. Consequences of Bribery

3.1 Individuals convicted under the Act face fines and/or imprisonment for up to 10 years. Organisations may receive unlimited fines and suffer serious reputational damage.

3.2 Employees found to have breached this policy may face disciplinary action up to and including dismissal.

3.3 The Company may also be subject to civil and criminal penalties, loss of public-sector contracts, and adverse media exposure.

4. Scope and Responsibility

4.1 This policy applies to all employees, officers, directors, agency staff, contractors, consultants, suppliers, and business partners acting for or on behalf of Priority Waste Limited.

4.2 Everyone covered by this policy must take reasonable steps to prevent, detect, and report bribery. All suspicions or concerns must be reported in line with the **Whistleblowing Policy**.

4.3 No individual may:

- Offer or promise any advantage to induce improper conduct;
- Request or accept any advantage for acting improperly; or
- Use a third party to circumvent these prohibitions.

4.4 Managers must ensure staff are aware of the risks, complete regular training, and understand reporting requirements.

5. Facilitation Payments

5.1 Facilitation payments (small unofficial payments to speed up routine actions) are illegal under UK law and strictly prohibited.

5.2 The only exception is where a payment is made under **duress** to protect life or personal safety. Any such payment must be reported immediately to the **General Manager** as soon as it is safe to do so.

6. Gifts and Hospitality

6.1 Reasonable and proportionate gifts and hospitality may be used to build legitimate business relationships but must never influence a business decision or create an expectation of preferential treatment.

6.2 All gifts and hospitality must:

- Be proportionate and transparent;
- Comply with the **Gifts and Hospitality Policy**;
- Never involve cash or equivalents; and
- Be recorded in the **Gifts and Hospitality Register**.

6.3 Where refusal would cause serious cultural offence, the gift may be accepted but must be donated to a charity approved by the Director and fully recorded.

7. Charitable and Political Donations

7.1 All charitable donations must be made only to registered charities, properly authorised by the Director, and recorded in the donations register. Proof of receipt is required. No cash donations are permitted.

7.2 Priority Waste Limited does **not** make political donations and is not affiliated with any party or candidate. Personal donations by employees must not be made on behalf of the Company or to obtain business advantage.

8. Due Diligence and Risk Assessment

8.1 Before engaging new suppliers or third parties, the Company must undertake appropriate due diligence to evaluate bribery and corruption risk. This includes:

- Reviewing country-specific corruption indices and sector risks;
- Assessing any government relationships or permits involved;
- Confirming ownership and beneficial interest transparency as required under the Economic Crime Act 2023.

8.2 Unusual payment requests (e.g. cash, offshore accounts, split invoicing, or intermediaries) must be refused and reported immediately.

8.3 All contracts with suppliers and agents must include anti-bribery clauses and termination rights for non-compliance.

9. Training and Awareness

9.1 All employees will receive training on this policy as part of their induction and regular refresher training thereafter.

9.2 Awareness of this policy must be reinforced to suppliers and partners at the start of any business relationship and reviewed periodically.

10. Reporting Concerns

10.1 Employees must report any suspected breach of this policy to their line manager or the **Head of Procurement**.

10.2 Alternatively, concerns can be raised confidentially under the Company's **Whistleblowing Policy**.

10.3 Priority Waste will not tolerate retaliation against anyone who raises a concern in good faith.

11. Breach of Policy

11.1 Any employee found to have engaged in bribery or failed to prevent it may face disciplinary action, including dismissal, and may be reported to the authorities.

11.2 The Company reserves the right to terminate relationships with any supplier, agent, or partner found to be in breach of this policy.