

<b>HR Policies &amp; Procedures</b>	Document no:	HR-POL-030	
	Issue date:	May 2021	
<b>Ethical Policy</b>	Revision no:	4	
	Review date:	July 2025	
Owner:	Ceri McCallum	Approver:	Tanya Fisher



## Olleco Ethical Policy

**Our commitment** - Olleco is committed to ensuring a culture of openness, trust and integrity in all its business practices. This policy outlines Olleco’s expectations in relation to how to deliver on this culture and ensure we do things the right way.

**What does this commitment mean?** It means that, by taking a proactive approach to the way we conduct ourselves, Olleco is committed to protecting employees, customers, suppliers and itself from illegal or damaging actions and to simply doing the right thing.

Ethical conduct reaches every part of our working day and this policy sets out the practical details of the Olleco way.

### Anti Corruption

Committed to securing work and supply on the merits of our business, the company has clear and robust Anti Bribery and Receipt of Gifts policies in place. We will never use inappropriate measures to influence a decision or obtain a business advantage that is unlawful or unethical.

### Competitive Behaviour

Confident in the value and quality provided by Olleco we will never behave in an unlawful, anti-competitive manner or participate in associated activities.

### Conflict of Interests

Our commitment to ethical practices rightfully demands that our business decisions are made ethically and in the best interests of Olleco. Any situation which creates, or appears to create, a conflict of interest must be avoided, eliminated or

appropriately disclosed. Our individual contracts and the Outside Business Interests Policy details our obligations as individuals.

### Political Activities

Olleco, as a company may take positions on political issues and lobby on behalf of its interests and goals, but always in strict conformance with applicable laws. Employees who communicate with government officials on behalf of Olleco should make themselves fully aware of the laws and regulations which apply to them and the Company. The Company respects the right of the individual to be involved in and participate in the political process. However, you must ensure it is clear that your actions and opinions are your own and not those of Olleco. Company resources may not be used to promote your personal political views.

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Corporate Social Responsibility

As a national company that prides itself on behaving as a local partner, we believe contributing to the communities we operate in is important.

As a resource recovery organisation safeguarding the environment matters. Our Environment Policy sets clear guidelines across the Company.

Human Rights and Worker Welfare

The way in which we work together as a team to achieve our vision and ensure our customers are at the center of everything we do is vital to the success of Olleco. This is only possible by ensuring the engagement and welfare of every individual in the diverse Olleco family.

We care, committed to protecting human rights Olleco will not tolerate child labour, forced labour, physical punishment or discrimination of any kind. Complying with UK labour laws we ensure every employee and worker is treated with dignity and respect. Our policies make certain that this

is understood and enforced across the business. We have clear policies in place around child labour and modern slavery as well as flexible working and parental leave to support labour diversity. Our Employee Voice activities provide us with the opportunity to understand employee concerns on a regular basis and to foster engagement at all levels.

Health and Safety

‘Safety First’ is Olleco’s commitment to delivering an incident free working environment for everyone. ‘Safety First’ is the key ethos throughout the organisation. Not only complying with legal requirements we strive for best practice in all areas. The SHEQ policy sets out the formal position, however Safety is owned by every member of the organisation.

Confidentiality and Data Protection

Every member of Olleco has an obligation to protect the confidential information and data of the Company, its employees, customers and suppliers. Compliant with the Data Protection regulations Olleco takes information security seriously and has clear guidelines about the use of confidential or commercially sensitive data. Data Protection, Information Technology and Social Media policies are in place to reinforce this.

Reporting and Enforcement

We are responsible for ensuring our actions are always consistent with the ethical



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principles and rules outlined in this policy and the associated documents and all employees sign a code of conduct on a biennial basis to that effect. Our responsibility, however, does not end there. Anyone observing conduct that might be a violation of the Ethical business policy should raise the issue promptly.

Concerns can be raised with line managers, Olleco HR, Olleco contacts or even through Our external whistleblowing helpline Safecall (0800 915 1571) or report an incident via the web reporting link <https://www.safecall.co.uk/en/file-a-report/>.

Any breach of this policy will not be tolerated. Employee breaches of this policy may be considered gross misconduct and employees behaving in an inappropriate way as defined in this or the associated policies may be subject to disciplinary action up to and including dismissal.

Associated persons will be subject to action as appropriate. As an example suppliers who are found to solicit or offer bribes will

have their agreements terminated without notice or liability on the part of the company. This is an illustration of the company's response and not a comprehensive list.

The company reserves the right to inform the relevant authorities where any breach is considered sufficiently serious or where any breach of legal obligation has occurred.

#### Associated Policies and Documents

- Anti-Bribery Policy
- Child Labour Policy
- Contracts of Employment
- Data Protection
- Disciplinary Procedure
- Whistleblowing Policy
- Environmental policy
- Grievance Procedure
- Information Technology
- Modern Slavery Policy
- Outside Interests Policy
- Receipt of gifts
- Remote Access
- SHEQ Policy
- Social Media Policy

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