

Health and Safety Policy

Omni Recycling Ltd is a regional provider of products and services within the waste Management industry

The directors of Omni Recycling recognise that they have a moral and legal duty of care towards protecting the health and safety of employees and others who may be affected by the Company's activities.

In order to discharge their responsibilities the directors of Omni Recycling will so far as is reasonably practicable

- Carry out operations in compliance with applicable health and safety policies and procedures, UK health and safety legislation and any other requirements to which Omni subscribes to that relate to health and safety hazards
- Provide such resources to ensure that the standards described in this policy statement are achieved and maintained
- Provide an organisational structure that clearly defines the responsibilities for health and safety and ensures that the systems and procedures relating to this policy statement are rigorously applied
- Systematically identify all hazards and their associated risks and take such steps as are required to reduce risks to an acceptable level in order to prevent injury and ill health
- Ensure that all persons employed have reasonable experience and/or the training necessary, to achieve the level of competence required to ensure their own health and safety and that of others who may be affected by their work activities
- Continually improve Omni's health and safety performance through setting and reviewing targets and objectives and regularly measuring the performance achieved
- Eliminate, so far as is reasonably practicable, unacceptable behaviour such as bullying, interpersonal conflicts at work, racial and sexual harassment which causes unnecessary stress in the workplace
- Ensure that any company who is contracted to carry out work on behalf of Omni Recycling is able to demonstrate that it pays due regard to health and safety matters
- Bring this policy statement to the attention of all employees and other (as required) to seek their co-operation in supporting the Company in its objective of achieving and maintaining a healthy and accident free workplace.


D Andrews

Director

5th January 2026

Environmental Policy

Omni Recycling Ltd is a regional provider of products and services within the waste management industry

We are a privately owned company that takes its responsibilities to our staff, customers, suppliers, local communities as well as the wider environment very seriously. We recognise that our activities impact on the environment and are committed to managing and continually improving our environmental performance.

Omni Recycling will:

- Ensure that environmental impacts are assessed throughout the planning, design and delivery of services to prevent pollution, minimize negative impacts and maximize positive impacts.
- Comply with all environmental legislation, regulations and other requirements relevant to our business activities to which we subscribe.
- Continually improve our environmental performance through setting and reviewing objectives and targets and regularly measuring the performance achieved.
- Implement environmental control systems to measure compliance and performance, and enable prevention of pollution and nuisance to local communities and the wider environment.
- Continually improve energy efficiency of our activities coupled with waste reduction and increased recycling.
- Provide sufficient resources and training to achieve policy objectives and foster an understanding of environmental responsibility amongst our stakeholders.
- Listen to and respond to the needs of employees and local communities.
- Communicate this policy to everyone working for and on behalf of the company and other interested parties.


D Andrews
Director

5th January 2026



Energy Policy

The Omni Group is a regional provider of products and services within the waste management, haulage, plant hire & recycled aggregate sectors

We are a privately owned company that takes its responsibilities to our employees, customers, suppliers, local communities and the wider environment very seriously. We are committed to making effective and efficient use of energy at our facility and during our activities.

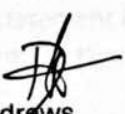
We believe in preserving natural resources, reducing carbon emissions and helping to mitigate the effects of climate change. Our goal is Net Zero Carbon Emissions.

The Omni Group will:

1. Be led by senior management and promote programmes that improve energy-related performance and identify energy reduction opportunities.
2. Ensure compliance with all applicable legal requirements which relate to energy aspects and other requirements.
3. Use this policy as a framework for setting and reviewing energy objectives and targets, provide the necessary information and resources to achieve them.
4. Monitor and analyse energy consumption to identify and improve efficiency and promote continuous improvement.
5. Consider energy efficient products and services in the procurement of business assets and appointment of suppliers.
6. Ensure compliance with this policy is the responsibility of all individuals who take part in the company's operations and activities.
7. Make available to stakeholders transparent information regarding energy consumption, its corresponding greenhouse gas emissions and any improvement actions taken.

This policy will apply to all sites and premises and will be communicated to all our employees.

Senior management will review this policy on an annual basis.


D Andrews
CEO Omni Group

5th January 2026



Modern Slavery Act 2015 Statement

Omni believe that slavery, the exploitation of workers and the use of child labour should play no role in the operation of modern-day business. Omni is committed to ensuring that acts of modern slavery and human trafficking are not present within its own operations, or those of its suppliers, contractors and business partners.

Omni operates a Responsible Purchasing Policy and approval process that seeks to ensure that Omni only does business with like-minded suppliers, contractors and business partners that uphold the same standards of business ethics. This requires confirmation of compliance with relevant UK legislation and industry standards and where applicable evidence of supporting policies and processes including those addressing the risk of modern slavery. Where identified suppliers, contractors and business partners are not able to provide us with adequate assurances on compliance we will cease to trade with them in accordance with our terms and conditions of purchase, unless they can clearly demonstrate that they are taking verifiable action towards compliance. During the financial year the application of the Responsible Purchasing Policy continues to be the main control used by the company in its risk management of modern slavery and it is a requirement for modern slavery compliance to be verified where approval is required for expenditure above a set limit. The company continues to review compliance of its supplier base on a rolling basis.

The company continues to focus on the potential risk of slavery and human trafficking in business sectors supplying goods and services to our operations and the supply of temporary labour remains identified as the main area of risk.

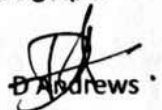
Omni requires all employees to adhere to its Code of Conduct, which sets out the standards of workplace behaviour expected of them. This includes their behaviour towards each other, contractors and suppliers. All employees are expected to act with dignity and respect, while upholding the highest standards of business ethics. The Code of Conduct Policy is supported by Equal Opportunities and Fair Employment policies and practices to ensure the company complies with UK employment legislation and employee rights at work are maintained.

Employees are kept informed and updated on policies through a number of internal communication channels and training is conducted to support the company's culture and strong business ethics.

Omni operates a Whistleblower Policy which provides employees with a confidential method of reporting suspected wrongdoing if they believe it to be taking place within the business. Any reported concerns are taken seriously and are appropriately investigated.

Omni is committed to reviewing its policies and procedures to maintain an ethical and legally compliant culture within its business and those it does business with.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Omni's Anti-Slavery and Human Trafficking statement for the financial year ending April 2023.


D. Andrews
Director

5th January 2026

Quality Policy Statement

It is the policy of The Omni Group to provide a high quality, professional and efficient service in order to ensure the satisfaction of all its interested parties. This Quality Policy Statement will result in securing efficiency, a strong customer focus and the enhancement of long-term sustainability and profitability within the business.

Senior management will show leadership and commitment and acknowledge responsibility for implementing, integrating and maintaining the Environmental Management System (EMS) for quality compliance at all levels and aspects of the business.

Omni Group undertakes to ensure that sufficient resources are made available to achieve this.

It also undertakes to ensure through communication, engagement, practical example and training that quality is the aim of all employees of the Company.

Through direction and support, each employee will have a proper understanding of the importance of quality and the EMS, their responsibility to contribute to its effectiveness and its direct relevance to the success of the Company.

Equally, every employee is responsible for and will be trained in the duties required by his or her specific role.

Omni Group has a policy of promoting continual improvement and setting of quality objectives in line with the frameworks laid out within formal quality schemes. These objectives will address the risks and opportunities within the Company, as determined by senior management.

The company's BMS will be monitored, measured, evaluated and enhanced at frequent intervals with regular reporting and communication of its status and effectiveness at all levels.

Omni Group endorses this Quality Policy Statement and senior management acknowledge that responsibility rests with them to ensure that it is communicated, understood, implemented and maintained at all levels within the business and that it achieves its intended outcomes.

D Andrews 

Director

5th January 2026



Anti-bribery and Corruption Policy

Omni Recycling Ltd Summary Anti Bribery and Corruption Policy: covering the giving and acceptance of bribes

Introduction

Omni values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- Setting out a clear Anti Bribery & Corruption policy;
- Training employees so that they can recognise and avoid the use of bribery by themselves and others;
- Encouraging its employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution;
- Taking firm and vigorous action against any individual(s) involved in bribery.

Omni absolutely forbids corruption and the paying or receipt of bribes for any purpose.

The Policy

Bribery - Bribery is the offering, promising, giving, solicitation or the receipt or agreement to receive any financial or other advantage, or any other inducement from any person or company, (wherever they are situated and whether they are a public official or body, or a private person or company), by an individual employee, agent or other person or body acting on another's behalf.

Corruption – Corruption is the abuse of entrusted power for a private gain.

Omni prohibits:

Bribery of or by any person or company, in any jurisdiction, wherever they are situated and whether they are a public official or body or private person or company or by any individual employee, agent or other person or body acting on the Group's behalf in order to

1. gain any commercial, contractual or regulatory advantage for the Company in a way which is unethical or
2. gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual or
3. induce the improper performance of any function that is of a public nature, connected with a business, performed by a body or performed by a person in the course of their employment.

When acting for the Company, political contributions are not allowed and charitable contributions are allowed only within agreed Corporate schemes and guidelines.

Facilitation payments are any payment made (except where comprised in a lawful and published tariff of general application) as an inducement to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has a legal entitlement. These are not permitted or condoned by the Company.

Further clarification

The Company recognises that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- normal and appropriate hospitality
- the giving of a ceremonial gift on a festival or at another special time
- the use of any recognised fast-track process which is available to all on payment of a fee.

The prevention, detection and reporting of bribery or corruption is the responsibility of all persons within or associated with the Company.


D Andrews
Director

5th January 2026



Drugs & Alcohol Policy

Under the Health & Safety at Work Act(1974) the company has a duty to ensure the health, safety and welfare at work of all their employees, visitors and contractors – and this extends to controlling the risk to workplace health and safety caused by the misuse of drugs and alcohol by individuals

The company has a Drugs and Alcohol Policy the objectives of which are to:

- prevent drugs and alcohol problems in the work place
- make the company's rules on drugs and alcohol clear
- seek to identify problems at an early stage and minimise risk to health and safety
- recognise drugs and alcohol problems and provide help in confidence
- show the misuse of alcohol or drugs does not exonerate any individual from the results of their actions or from disciplinary action.

3.1 Consumption and condition at work

You must not consume, use or be under the influence of alcohol, illegal drugs or psychoactive substances on any company site or premises. You must not be under the influence of alcohol, illegal drugs or psychoactive substances whilst at work, on call to work or on any company site or premises if as part of your job description you are expected to drive or direct road or site vehicles, operate machinery, undertake actions covered by manual handling regulations or are responsible for the direct management of employees performing these tasks.

3.2 Consumption of alcohol at corporate and work events

There may be situations inside and outside normal working hours such as at corporate events, when representing the company on business or Hills' organised social events where alcohol is made available to you. You are required to act responsibly and not bring the company into disrepute if you elect to consume alcohol.

3.3 Medication

If you are taking legally prescribed or over-the-counter medication, you must ensure that your use does not adversely affect your work performance and the safety of yourself and others. You must ensure that you are aware of any side effects that may impair your ability to do your job. If you are in any doubt then you must notify your line manager that you are taking medication.

3.4 Illegal drugs

Illegal drugs are those controlled by the Misuse of Drugs Act 1971 and Psychoactive Substances Act 2016. These include, but are not limited to, heroin, cannabis, cocaine, ecstasy and amphetamines.

3.5 Coercement

It is a disciplinary offence to socially coerce or bully a fellow employee:

- if they have elected not to consume alcohol;
- into consuming alcohol against their will, or
- to consume or take illegal substances or unprescribed medication.

3.6 Alcohol and drug testing

The company reserves the right to request that you undertake testing in circumstances when they believe either alcohol, drugs or psychoactive substances have played a contributing factor in an accident or near miss. It is anticipated that most other cases will not proceed to a drug and alcohol test but will be handled using normal line management practices. However, in the absence of a satisfactory alternative explanation for the behaviour or performance, and where the employee is suspected of, or admits to, being in breach of this policy, the company reserves the right to test.



D Andrews

Director

5th January 2026



GDPR Policy Statement

Omni Group (Omni Recycling, Omni Waste Management, Omni Recycled Materials)

Registered Address: North Farm Lane, Royal Tunbridge Wells TN23EE

Contact Email: compliance@omnirecycling.co.uk

1. Purpose

This GDPR Policy Statement outlines how Omni complies with the General Data Protection Regulation (EU) 2016/679 ("GDPR") in relation to the collection, processing, and storage of personal data. We are committed to protecting the rights and privacy of individuals whose personal data we handle.

2. Scope

This policy applies to:

- All employees, contractors, and third parties working with Omni.
- All personal data processed by or on behalf of Omni.
- All systems, processes, and services used for data processing.

3. Our Commitment to Data Protection

Omni is committed to:

- Processing personal data lawfully, fairly, and transparently.
- Collecting data only for specified, explicit, and legitimate purposes.
- Minimizing data collection and ensuring it is adequate and relevant.
- Keeping data accurate and up to date.
- Retaining data only for as long as necessary.
- Ensuring appropriate security of personal data.

4. Lawful Basis for Processing

We process personal data under one or more of the following lawful bases:

- Consent of the data subject.
- Performance of a contract.
- Compliance with a legal obligation.
- Protection of vital interests.
- Legitimate interests pursued by Omni or a third party.

5. Data Subject Rights

Under GDPR, individuals have the right to:



- Access their personal data.
- Request correction of inaccurate or incomplete data.
- Request erasure ("right to be forgotten").
- Restrict or object to processing.
- Request data portability.
- Withdraw consent at any time.

Requests can be made by contacting us at: compliance@omnirecycling.co.uk

6. Data Retention

Personal data will be retained only for as long as necessary to fulfill the purposes for which it was collected, including legal, accounting, or reporting obligations. Once data is no longer needed, it will be securely deleted or anonymized.

7. Data Security

We have implemented appropriate technical and organizational measures to protect personal data from unauthorized access, disclosure, alteration, or destruction. These measures include:

- Access controls and authentication procedures.
- Encryption and secure storage.
- Regular system monitoring and audits.
- Employee training in data protection.

8. Data Sharing and Transfers

We will only share personal data with third parties when necessary and in compliance with GDPR. Where data is transferred outside the European Economic Area (EEA), appropriate safeguards such as Standard Contractual Clauses (SCCs) or adequacy decisions will be used.

9. Breach Notification

In the event of a data breach, Omni will follow GDPR Article 33 and 34 requirements. Relevant supervisory authorities and affected individuals will be notified as required by law.

10. Review and Updates

This policy will be reviewed regularly and updated as necessary to reflect changes in data protection laws, best practices, or operational changes.

Contact Us

If you have any questions or concerns about this GDPR Policy Statement or how your personal data is handled, please contact:

✉ compliance@omnirecycling.co.uk

A handwritten signature in black ink, consisting of a stylized 'A' with a horizontal line extending to the right.



Training Policy

Introduction

Omni Recycling Ltd is committed to providing the necessary training to ensure our workforce meets the requirements of legislation & waste permitting. We are also committed to providing the necessary personal development to improve the skills and competence of our workforce in the focused delivery of services to our clients.

Aim

The aim of training is to ensure that all employees are given the necessary help to develop the knowledge, skills and attitude they require to carry out their jobs legally and efficiently and to provide every opportunity for career development.

Responsibilities

To maintain the structures and mechanisms for identifying training needs and for monitoring the effectiveness of Omni Recycling Ltd 's training policy and programmes

Senior management are responsible for the continual monitoring of staff training and development throughout the year and to provide the necessary assistance and encouragement to ensure that the company objectives are being met, procedures are being followed and staff's needs are being achieved.

An internal review of training policy and procedures will be carried out every 12 months.

This is the training required to enable an employee to work on a particular contract, site or for a particular client. This will include, but not be limited to, Health and Safety at Work training specific to the contract, site or industry sector. Upon completion of this training the employee will be qualified to work on the contract, site or for the client in question. 2

Continuation Training and Personal Development

This is the training which further improves the skills and knowledge of the employee and which, amongst other things, will prepare the employee for promotion.

Training Records

A record of training will be established for each individual employee and held centrally on the personnel file. This will be continual updated throughout the lifecycle of their employment to provide an auditable trail of their training and development

Training Assessments

All staff, including new personnel, will have their skills continually assessed by their Manager as identified below:

At the time of recruitment – any immediate training needs identified by the Manager will be addressed prior to commencing work.

At appraisal stage – it is policy to undertake an annual staff formal / informal appraisal to review performance over the previous twelve months, to identify ways of maximising strengths and improving areas of development in the context of achieving the Company's aims and objectives. These formal / informal reviews are the main vehicle of reviewing and identifying continuation training needs to improve job performance.

Specific requirements of a project – projects may have unique training requirements that are most appropriately satisfied at project level to ensure the successful delivery of schemes.

Training needs as required as a result of corporate change – which will affect everyone within the organisation.

Training Processes

The manager in charge of training will have overall responsibility for analysing training needs identified by the processes above and will discuss with the Director and employee the most appropriate and cost effective way of addressing these.



D Andrews

Director

5th January 2026



Equality, Diversity and Inclusion Policy

Omni Recycling Ltd is committed to encouraging equality, diversity and inclusion among our workforce, and eliminating unlawful discrimination.

The aim is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best.

The organisation - in providing goods and/or services and/or facilities - is also committed against unlawful discrimination of customers or the public.

Our policy's purpose

This policy's purpose is to:

1. Provide equality, fairness and respect for all in our employment, whether temporary, part-time or full-time

2. Not unlawfully discriminate because of the Equality Act 2010 protected characteristics of:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race (including colour, nationality, and ethnic or national origin)
- religion or belief
- sex
- sexual orientation

3. Oppose and avoid all forms of unlawful discrimination. This includes in:

- pay and benefits
- terms and conditions of employment
- dealing with grievances and discipline
- dismissal
- redundancy
- leave for parents
- requests for flexible working
- selection for employment, promotion, training or other developmental opportunities

Our commitments the organisation commits to:

1. Encourage equality, diversity and inclusion in the workplace as they are good practice and make business sense
2. Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued. This commitment includes training managers and all other employees about their rights and responsibilities under the equality, diversity and inclusion policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination. All staff should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public
3. Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of the organisation's work activities. Such acts will be dealt with as misconduct under the organisation's grievance and/or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice. Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.
4. Make opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.
5. Make decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
6. Review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.
7. Monitor the make-up of the workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in the equality, diversity and inclusion policy. Monitoring will also include assessing how the equality, diversity and inclusion policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues. Agreement to follow this policy

The equality, diversity and inclusion policy is fully supported by senior management and has been agreed with trade unions and/or employee representatives [insert details as appropriate].

Our disciplinary and grievance procedures

Details of the organisation's grievance and disciplinary policies and procedures can be found in the company handbook. This includes with whom an employee should raise a grievance – usually their line manager.

Use of the organisation's grievance or disciplinary procedures does not affect an employee's right to make a claim to an employment tribunal within three months of the alleged discrimination.

D Andrews

Director

5th January 2026

Purchasing Policy

This policy details the principles that Oms will seek to apply when engaging with external business partners to work with and in order to supply goods and services.

For the purpose of this policy the following definitions are used:

Business partner - a legal entity, organisation or person that represents or is appointed as a sub-contractor to a contract and act in accordance with the contract on behalf of Oms.

Contractor - a legal entity, organisation or person who supply goods or services that requires the contractor to carry out installation or maintenance on Oms sites or installations (repair or maintenance to machinery, plant or buildings on Oms site).

Supplier - a legal entity, organisation or person that supplies goods or services to Oms. For the avoidance of doubt this includes sub-contractors and suppliers of Army vehicles.

2. Oms' standards, business partner and supplier principles

2.1 Code of Conduct

Oms will only look to trade with suppliers and sub-contractors and business partners who agree to work within the Code of Conduct and related policies or who give consent that they operate within a policy framework that is at least comparable standards to that of Oms. Oms Code of Conduct provides a framework, guiding workplace behaviour and business ethics.

2.2 Equal opportunities and fair employment practices

Oms believes in giving everyone an equal opportunity to work and succeed within the business. Oms does not tolerate discrimination.

Oms believes that diversity, the exploitation of work and the use of staff internationally play



Purchasing Policy

1. Omni Recycling Ltd (The Company) prides itself on conducting its business in a transparent and ethical manner. When making business decisions Omni gives full consideration to minimising any possible negative impacts, whilst enhancing the positive impacts to the environment and society arising from our operations. Omni believes that this is best achieved by working with suppliers, contractors and business partners who hold the same attitude to business.

This policy details the principles that Omni will look to apply when appointing contractors and business partners to work with and in selecting suppliers of goods and services.

For the purpose of this policy the following definitions are used:

Business partner - a legal entity, organisation or person that represents or is appointed as a sub-contractor to a contract and act in any capacity under that contract on behalf of Omni

Contractor - a legal entity, organisation or person who supplies goods or services that requires the contractor to carry out installation or other works on Omni sites; or undertakes repair or maintenance to machinery, plant or buildings on Omni sites.

Supplier - a legal entity, organisation or person that supplies goods or services to Omni.

For the avoidance of doubt this includes temporary employees or agency workers.

2. Omni contractor, business partner and supplier principles

2.1 Code of Conduct

Omni will only look to trade with suppliers and work with contractors and business partners who agree to work within its Code of Conduct and related policies or who give undertakings that they operate within a policy framework that upholds comparable standards to that of Omni. Omni Code of Conduct provides a framework covering workplace behaviour and business ethics.

2.2 Equal opportunities and fair employment practices

Omni believes in giving everyone an equal opportunity to work and succeed within the business. Omni does not tolerate discrimination.

Omni believe that slavery, the exploitation of workers and the use of child labour should play

no role in the operation of modern day business. Omni is committed to ensuring that acts of modern slavery and human trafficking are not present within its operations, those of its suppliers, contractors or business partners.

Omni will only work with contractors and business partners and use suppliers who have declared their compliance with UK employment legislation and industry practices and relevant employment legislation in the countries in which they operate.

2.3 Employee welfare

The welfare and health and safety of Omni employees whilst at work and that of visitors to its sites is a priority. Omni only works with contractors and business partners who can actively demonstrate that they operate in a safe and responsible manner and when on Omni sites or working on Omni behalf meet the standards and act in accordance with Omni health and safety management systems.

2.4 Environment and community

Environmental and community issues are at the heart of Omni decision making processes. Suppliers, contractors and business partners should be able to show that they give similar priority in their own business decision making process and give undertakings that they will uphold the same standards as Omni when carrying out work on Omni's behalf.

2.5 Data protection

If required to handle employee or customer data on behalf of Omni then suppliers, contractors and business partners must be able to demonstrate that they have robust procedures and management systems to ensure the privacy and security of data is maintained in accordance with UK Data Protection regulations.

3. Register of approved contractors and business partners

3.1 Approval of contractors and business partners

Omni operates a contractor and business partner approval process which requires a company or trader wishing to work with Omni in either capacity to provide information and give undertakings to support their compliance with Omni's contractor, business partner and supplier principles, in addition to any other specific operational requirements. Each trading company of Omni is to:

Nominate a competent person or persons to review the documents submitted by a contractor or business partner and such person will be responsible for accepting or

declining their approval

Maintain a register of approved contractors and business partners with supporting information

Undertake a regular review of the information held to support approved contractors and business partners on the register.

In certain circumstances Omni will undertake audits of approved contractors and business partner operations and management systems to verify documentation submitted as part of the approval process.

4 Suppliers

Omni will:

Identify its current suppliers

Write to all its current suppliers and request that they give an undertaking in writing confirming their compliance with the Modern Slavery Act 2015.

If a supplier has a turnover of £36m or over per annum they should provide a copy of their published statement of compliance with the Modern Slavery Act 2015

Where a supplier is believed to be in breach with the Modern Slavery Act 2015 and refuses or is unable to give an undertaking confirming compliance with the Modern Slavery Act 2015 within a reasonable time, they will be removed from Omni's purchase order system.

5 Procurement of goods, services and asset purchase (including capital works)

When looking to procure goods, services and asset purchases employees should obtain competitive quotes and look to obtain the best value for Omni. When evaluating best value employees should consider and weigh up the benefit of each quote against a number of factors (as applicable) over time:

- The price paid
- Reduced costs of operation eg lower fuel consumption
- Avoided costs eg reduction in maintenance cost
- Enhanced health and safety
- Reduced environmental impact
- Improved productivity
- Improved operation
- Cost of finance
- Investment return
- Enhanced reputation

- Legal compliance.

Whistleblower Policy & Procedure

1. INTRODUCTION

The Oriel Group, Oriel Publishing, Oriel Media, Oriel Group and Oriel Publishing are committed to maintaining a work environment in which all employees can raise concerns about the conduct of the business or the conduct of any individual without fear of reprisal. This policy is intended to provide a framework for the handling of such concerns and to ensure that all employees are aware of the following principles and procedures:

- Confidentiality (to the extent possible);
- Failure to comply with legal obligations (e.g. non-compliance with employment law);
- A miscarriage of justice (such as an employee making a false statement, alleging wrongdoing by another employee);
- Damage to the health and safety of any individual;
- Damage to the environment;
- Unethical or improper conduct;
- Attempts to conceal any of the above.

This Policy sets out the procedure by which individuals working for Oriel ("employees") can raise concerns about workplace practices or "disclosures".

For the purpose of this policy, workers include:

- Full, part-time or occasional employees;
- Agency workers;
- People dealing with the Group, but not employed;
- Self-employed workers or contractors, if supervised or working off-site.

This Policy is for guidance only and does not form part of an employee's contract of employment.

2. REASON FOR POLICY

For the Oriel Group to achieve and maintain its objectives, workers must have the ability to raise concerns internally. This Policy is intended to provide a framework for those who believe that they have discovered a problem or wrongdoing by the Group's employees, such as those listed above, in order to ensure that such concerns are handled.

3. LEGISLATIVE FRAMEWORK

When reporting to the Oriel Group, a worker who has experience or knowledge of wrongdoing, fraud or other illegal or unethical conduct occurring in the workplace. The Oriel Group will treat all disclosures as confidential and will not disclose any information to the public. The Oriel Group will also ensure that all disclosures are handled in accordance with the Public Interest Disclosure Act 1998 and will ensure that the Oriel Group is aware of any potential legal implications of any disclosures.

D. Andrews

Director

5th January 2026

Whistleblower Policy & Procedure

1. POLICY STATEMENT

The Omni Group, Omni Recycling, Omni Waste Management & Omni Recycled Materials wish to maintain a work environment in which all workers can raise genuine concerns about poor or unacceptable practices or misconduct without fear of reprisal. UK Law specifically protects a "whistleblowing" worker against dismissal or other sanctions, provided they reasonably believe that one of the following has or is likely to occur:

- Criminal activity (e.g theft or fraud);
- Failure to comply with a legal obligation (e.g non-compliance with employment law);
- A miscarriage of justice (such as one employee making a false statement alleging wrongdoing by another employee);
- Danger to the health and safety of any individual;
- Damage to the environment;
- Unethical or improper conduct;
- Attempts to conceal any of the above.

This Policy sets out the procedure by which individuals working for Omni ("workers") can report concerns about workplace practices (a "Disclosure").

For the purpose of this policy worker(s) means:

- Full, part-time or occasional employees
- Agency workers
- People training with the Omni, but not employed
- Self employed workers or contractors, if supervised or working off-site.

This Policy is for guidance only and does not form part of an employee's contract of employment.

2. REASON FOR POLICY

For the Omni Group to achieve and maintain its core values, workers must have the ability to raise concerns internally. This Policy is intended to provide workers who believe that they have discovered malpractice or dishonesty in the Group's activities, such as those listed above a method to raise these concerns.

3. LEGISLATIVE FRAMEWORK

Whistleblowing is the disclosure of information by a worker who has experience or knowledge of dangerous activity, fraud or other illegal or unethical conduct occurring in the workplace. The Employment Rights Act 1996 as amended by the Public Interest Disclosure Act 1998 (as amended) governs the disclosure by a worker of unacceptable workplace activities or practices

and is intended to protect workers who 'blow the whistle' from being subjected to dismissal or any detriment as a result.

4. RESPONSIBILITIES

This Policy applies to all individuals working for the Omni Group.

- All workers are responsible for raising genuine concerns.
- The Directors of the Omni Group are responsible for ensuring that a procedure is available for genuine concerns to be raised by workers and thoroughly investigated without reprisals or sanctions.
- Line Managers are responsible for implementing and abiding by that procedure.

5. POLICY CONTENT

If a worker raises a concern, they will not be expected to produce unquestionable evidence to support their claim – this is the responsibility of the Omni Group once it has been alerted to the potential problem. A worker is only required to have a genuine concern and reasonable belief that the matter is in the public interest. If a worker raises a concern, even if that concern proves to be unfounded, they will not be regarded detrimentally so long as it was a genuine concern at the time; they reasonably believed the matter to be in the public interest and they have followed the procedure set out in section 8 below.

The Omni Group recognises that a worker may not wish to be identified during the course of an investigation. In such cases, the Omni Group will do everything reasonably and lawfully possible to protect the worker's identity.

If it proves impossible to resolve the matter without revealing a worker's identity, then the nominated Investigating Officer will discuss with the worker whether and, if appropriate, how an investigation is to proceed. In certain circumstances it may subsequently not be possible to maintain complete confidentiality (for example, if legal proceedings take place) but the Omni Group will do everything reasonably possible to support and protect the worker concerned. Although concerns raised anonymously will be considered, it is much more difficult for these Disclosures to be thoroughly investigated. Workers are encouraged not to make Disclosures anonymously.

If following completion of any investigation a worker is not satisfied with the outcome, they can refer the matter to the Managing Director.

6. SANCTIONS

The Omni Group will not tolerate the harassment or victimisation of any worker who raises a genuine concern. Any such occurrences, or failure by Line Managers to maintain confidentiality and apply the procedure set out in Appendix 1, will be dealt with under the disciplinary and/or harassment procedure. UK law does not provide any protection if a worker commits a criminal offence by disclosing information.

7. RELATED INFORMATION & PROCESS / PROCEDURES

7.1 This Policy and procedure does not cover the following for which separate procedures exist:

- Grievance or disputes by Employees about their terms and conditions of employment or working conditions (refer to Company Grievance policy and procedure).
- Complaints involving allegations of harassment or bullying (refer to the Company Harassment Policy).

8. PROCEDURE TO MAKE A DISCLOSURE

As stated in Appendix 1 below, the following procedures are in place for a worker to make a disclosure:

- a) The preferred option is for a worker to make an informal approach to their Line Manager. The Line Manager will then pass the Disclosure on to their Director who will either: (a) investigate the Disclosure; (b) appoint an appropriate person to investigate the Disclosure; or (c) approach the Company Secretary to investigate and/or appoint the appropriate Investigating Officer;
- b) An alternative option to (a) above is for a worker to bypass their Line Manager and make the Disclosure to their Director.

This policy does not preclude a worker from contacting external authorities (a prescribed person or body) such as the Health and Safety Executive, the Commission for Racial Equality, Environment Agency, or other similar public bodies if the worker believes the Omni Group:

- will ignore or cover up the Disclosure;
- treat the worker unfairly for making the Disclosure
- has not acted on a Disclosure already made by the worker.

9. REVIEW ARRANGEMENTS

This policy will be reviewed annually.

APPENDIX 1

THE INVESTIGATION PROCEDURE:

- If a worker's Disclosure relates to harassment or equal opportunities the appropriate Investigating Officer is the Head of Human Resources.
- For the purpose of this procedure "Designated Officer" is either the Director or the Company Secretary depending to whom the Disclosure has been made. Worker may make a Disclosure as outlined in clause 8 of the Omni Group Whistleblower policy. Once in receipt of a worker's Disclosure, the appropriate Designated Officer will send a written acknowledgement of the disclosure to the worker's home address and, as soon as practically possible, arrange an initial interview with the worker to ascertain the area of concern. At this stage the worker will be asked whether they wish for their identity to be disclosed and the worker will be reassured about protection from possible reprisals or victimisation. The worker will also be asked whether or not they wish to make a written or verbal statement. In either case, the Designated Officer will write a brief summary of the interview, which will be agreed by both the worker and the Designated Officer. The Designated Officer will then appoint an appropriate Investigating Officer. It is the responsibility of the Designated Officer to ensure that the Investigating Officer appointed will act in an independent and impartial manner when carrying out his/her investigation into the Disclosure. The investigation may need to be carried out under the terms of strict confidentiality

i.e. by not informing the subject of the Disclosure until (or if) it becomes necessary to do so. This may be appropriate in cases of suspected fraud. If there is evidence of criminal activity, the Investigating Officer should notify the Designated Officer who will notify the Chief Executive Officer. The Omni Group must not take any steps to hinder a police investigation. The Designated Officer will offer to keep the worker who made the Disclosure informed about the investigation and its outcome.

If the result of the investigation is that there is a case to be answered by any individual against whom a Disclosure has been made, the Disciplinary policy and procedure of the Omni Group will be used.

Where there is no case to answer, and the worker making the Disclosure had done so based on a genuine concern they reasonably believed the matter to be in the public interest and they have followed the procedure set out in section 8, the Designated Officer should ensure that the employee suffers no reprisals.

Only where a worker maliciously makes false allegations or does not follow the procedure set out in section 8, will it be considered appropriate to take action under the terms of the Omni Group Disciplinary policy and procedure against the worker who made the Disclosure. Due to the varied nature of investigations it is not possible to lay down strict time scales but all investigations will be carried out by the Investigating Officer as quickly as possible. The Investigating Officer should:

- obtain full details and clarification of a worker's Disclosure in writing;
- inform the worker that any member of staff against whom a Disclosure has been made will, where lawfully possible, be notified as soon as possible*;
- formally notify the member of staff against whom a complaint has been made in writing of the allegation and inviting them to an interview conducted in connection with the investigation. In certain circumstances the member of staff may be placed on cautionary suspension until the interview takes place;
- consider the involvement of the Head of Human Resources in the first instance and, if appropriate, the Omni Group's external auditors and/or the police.
- fully investigate the Disclosure, carrying out any necessary interviews or reviews of documentation;
- make a judgment concerning the Disclosure and its validity in the form of a written report which will then be passed to the Designated Officer for a decision on what (if any) action needs to be taken; and
- if necessary invoke the Omni Group Disciplinary policy and procedure to deal with the matter and where appropriate bring the matter to the attention of the Directors of the Omni Group. The Designated Officer who originally dealt with the Disclosure will notify the worker who made the Disclosure about the outcome of any investigation and if appropriate any action to be taken.

* Under Section 333 of, the Proceeds of Crime Act 2002, a person commits a criminal offence if they tip a person off that a complaint has been made against them that involves money laundering.