

Sustainability-Related Policies

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Environment

ENVIRONMENTAL POLICY

Purpose: To communicate Management objectives for commitment to human health and the environment. All Waste Management owned, operated or controlled operations, share responsibility to further the goals of this policy.

Policy: Waste Management is committed to protecting human health and the environment. This commitment is a keystone of all that we do, reflected in the services we provide to customers, the design and operation of our facilities, the conditions under which employees work, and our interactions with the communities where we live and do business. We will be responsible stewards of the environment and protect the health and well being of our employees and neighbors.

The following principles are applicable to Company operations worldwide:

- Protection: Conduct all operations in a manner that protects the environment and our employees, neighbors and customers. Proactively work to implement procedures and programs to prevent pollution.
- Compliance: Comply with all legal requirements and proactively implement programs and procedures to ensure compliance.
- Conservation: Practice and promote the conservation of nature and the earth's energy resources.
- Communication: All Waste Management employees are responsible for helping the Company identify and remedy possible violations. Suspicion of violations of law or Waste Management's Core Values of Ethical Conduct and Practices shall be communicated in accordance with the Company's Business Ethics and Compliance Policy and Environmental Reporting and Incident Notification Policy.

The Company has developed processes, procedures and tools for use in achieving its high standards for environmental performance and compliance. They collectively form the WM Environmental Management System (EMS). The Company's operations, across all lines of business, are responsible for implementation and adherence to the WM EMS at each operating location. This applies to all business endeavors in which WM has a fifty-percent or more ownership.

Management will regularly monitor operations and make recommendations to the Board of Directors on programs to continuously improve the environmental performance of the Company. Environmental goals and objectives will be established, reviewed and approved during management review. The WM Board of Directors and executive management will regularly monitor the environmental performance to ensure adherence to the principles of this policy across the Company.

Policy Owner/Contact: The policy owner is the Senior Vice President, Field Operations. Questions regarding this policy should be directed to the Policy Owner.

Variance Approvals: Policy variances must be obtained from the Policy Owner. Variances must be requested using the Variance Approval Form.

People

1. HUMAN RIGHTS POLICY

Purpose:

This policy reflects Waste Management's (WM) commitment to protect and advance human dignity and human rights in WM business practices. This policy applies to all personnel employed by or engaged to provide services to WM, including, but not limited to, WM's employees, officers, and contingent workers, as well as WM's contractors and suppliers.

Policy:

WM's relationships with its employees, contractors and suppliers and with the countries and communities in which WM operates are intended to reflect the principles, policies, and codes established and referred to in this policy. WM Code of Conduct is founded on responsible, honest and ethical behavior, and the character of WM is defined by the personal integrity and honesty of its employees. The WM Code of Conduct is the means to implement its human rights values and commitments.

This policy is guided by the Ten Principles of the United Nations Global Compact as derived from: The Universal Declaration of Human Rights, the International Bill of Human Rights and the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work. WM is committed to compliance with all applicable employment, labor, and human rights laws to ensure fair and ethical business practices are followed. WM's respect of human rights is demonstrated in its employment practices, including non-discrimination, diversity and inclusion, minimum age requirements, freedom of association and respect for collective bargaining and fair compensation policies. WM further demonstrates its dedication to human rights in the commitment to providing healthy, safe, and secure workplaces, and to promoting the health and safety of the communities in which it operates.

We expect our employees, contractors and suppliers to comply with the law in each place we do business and to abide by our Business Ethics and Compliance Policy, Code of Conduct or, as applicable, our Supplier Code of Conduct. Implementation of compliance with the Code of Conduct is overseen by the Chief Compliance Officer. WM Human Rights Policy is consistent with and incorporates the principles set forth in our policies which prohibit discrimination, child labor and human trafficking, modern slavery and forced labor.

Our goal is to conduct business with those who share our commitment to these same principles. WM will continue to require commitment to human rights from its contractors and suppliers. To ensure this commitment is met, WM includes in its supplier and service provider agreements a requirement that its business partners operate under business and ethics standards consistent with WM own standards.

Investigations and Audits

WM reserves the right, where applicable, to conduct investigations and audits to verify that business is being conducted in

compliance with this policy. All WM employees and third parties through whom WM conducts business are required to fully, accurately and promptly cooperate.

Policy Compliance

WM is committed to conducting business with the highest levels of integrity, in full compliance with the spirit and integrity of the laws of each country in which we operate as well as in full compliance with our Code of Conduct. We encourage anyone who believes that this policy has been violated to report their concerns to the Chief Compliance Officer. Reports may also be made through the WM Integrity Helpline at 800-265-9381 or its website (ethics@wm.com), both of which allow anonymous reporting as permitted by applicable law. Employees who fail to report actual or suspected misconduct may be deemed in violation of this policy as permitted by applicable law. WM will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

Any violation of this policy may be grounds for disciplinary action, up to and including termination, subject to applicable law. Violation of applicable laws may also result in criminal prosecution of responsible individuals.

Policy Owner/Contact:

The Policy Owner is the Chief Compliance Officer. Questions regarding this policy should be directed to the Policy Owner.

Variance Approvals:

Policy variances must be obtained from the Policy Owner. Variances must be requested using the Variance Approval Form.

Attachments / Links

- Business Ethics and Compliance Policy [ID: 393]
- Code of Conduct [ID: 677]
- Policy Against Human Trafficking and Modern Slavery [ID: 1245]
- Variance Approval Form [ID: 5]

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2. Public Policy Overseas

To ensure compliance with international law, Waste Management has adopted an anti-bribery and corruption policy and established a Foreign Corrupt Practices Act (FCPA) Compliance Committee. All employees involved in foreign business projects must receive FCPA training. In addition, the

Waste Management Code of Conduct includes a section on doing business overseas to ensure our compliance with local laws as well as U.S. laws that govern our activities in international markets. Visit https://www.wm.com/about/company-profile/ethics/pdfs/Code_of_Ethical_Conduct.pdf.

3. ANTI-BRIBERY POLICY

Waste Management (“WM” or “Company”) must not pay any bribe to any third party (public or private) for any purpose, at any time. Responsibility for maintaining this standard lies with everyone at the Company and compliance with this policy is mandatory. No employee will suffer adverse consequences for refusing to pay or refusing to be involved in any bribe, even if it results in losing business.

A. The Foreign Corrupt Practices Act (“FCPA”)

The FCPA is a U.S. criminal statute that prohibits bribery of foreign officials. The law may apply to the conduct of Company anywhere in the world and has significant criminal and monetary penalties for violations, including criminal and monetary penalties for individual employees. It not only applies to WM employees’ direct dealings with foreign public or government officials, but can also apply to the activities of third parties through whom anything of value could be passed on for the direct or indirect benefit of WM. Bribery involves authorizing, giving, promising to give, or offering anything of value, directly, or indirectly, with a corrupt intent to influence someone to retain or obtain business or any other improper advantage. It does not matter if a bribe is actually paid. The mere offer to pay a bribe is illegal. A bribe can be committed directly or indirectly, through a third party, and can be anything of value, including money, gifts, entertainment, and donations or contributions.

Facilitating Payments – Under the FCPA, a facilitating payment is a payment made to a foreign official or agency to facilitate or speed up the performance of an existing duty. Although these payments may be authorized under U.S. law in certain circumstances, they can be considered bribery under other laws such as the UK Bribery Act and may be illegal in other countries. Facilitating payments are prohibited by this Policy. Any request to pay a facilitating payment must be reported to the FCPA Committee.

All Bribes Prohibited – Under the FCPA, bribery of foreign officials is prohibited. However, many laws, including certain domestic laws and laws in other countries prohibit all bribery, whether foreign officials are involved or the conduct is between private parties. In addition to this broader scope, many laws make it illegal to both give and receive a bribe. This Policy prohibits giving or attempting to give a bribe to a foreign official or individual party, as well as the receipt of a bribe.

Books and Records –The books and records of the Company must accurately reflect the transactions of the Company. Failure to record all transactions, or the falsification of records to conceal transactions, constitutes a violation of the FCPA.

B. FCPA Compliance Committee

The Company has established an FCPA Compliance Committee (the “FCPA Committee”) led by the Company’s Chief Compliance Officer to promulgate procedures and provide oversight and training with respect to this Policy and any diligence, audits and/or investigations related to the Company’s anti-bribery compliance.

C. Compliance and Suspected Violations

Any Company employee who violates this Policy is subject to discipline, up to and including termination. Employees are encouraged to seek guidance from and must report any concerns or suspected violations of this Policy to the Policy Owner, the Chief Compliance Officer, or through the use of the Company’s Compliance and Ethics Helpline. The Company will not tolerate any form of retaliation or detrimental

personnel action against anyone reporting a potential violation in good faith or with reasonable grounds for suspicion or concern.

4. POLICY AGAINST HUMAN TRAFFICKING AND MODERN SLAVERY

Purpose: Waste Management (WM) is committed to a work environment that is free from human trafficking and slavery, including forced labor and unlawful child labor. WM will not tolerate human trafficking or slavery in any part of our organization. This policy reflects WM's Code of Conduct and our core values to protect and advance human dignity and human rights in our business practices. This Policy applies to all personnel employed by or engaged to provide services to WM, including, but not limited to, WM's employees, officers, temporary employees, contingent workers, casual staff, and independent contractors, as well as WM's vendors, suppliers and partners.

Every WM employee is responsible for reading, understanding and complying with this Policy.

WM managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this Policy and complete any certification or training required of them.

Policy: WM prohibits trafficking in persons and slavery. WM employees and others through whom WM conducts business must not engage in any practice that constitutes trafficking in persons or slavery and must comply by all applicable law and contract. This includes, but is not limited to, the following activities: • Engaging in any form of trafficking in persons; • Procuring commercial sex acts; • Using forced labor in the performance of any work; • Denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority; • Using misleading or fraudulent practices during the recruitment of candidates or offering of employment/contract positions regarding the key terms and conditions of employment; • Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place; • Charging applicants/candidates recruitment fees.

WM and its employees will cooperate fully with the U.S. Government or other appropriate governmental authorities in audits or investigations relating to such violations.

WM will continue to address risks associated with forced labor and human trafficking in its supply chain, including the following: • Evaluating and addressing supply chain risks in coordination with industry partners to increase awareness of human trafficking and to implement EICC programs. • Implement a supplier certification process requiring suppliers to certify to the best of their knowledge that the materials they incorporate into products were generated in compliance with applicable anti-slavery and human trafficking laws. • Training on human trafficking and slavery issues for employees directly managing the direct hardware supply chain.

Investigations and Audits: WM will perform investigations and audits to verify that business is being conducted in compliance with this Policy. All WM employees and third parties through whom WM conducts business are required to fully, accurately and promptly cooperate.

Policy Compliance: Report any conduct that you believe to be a violation of this Policy, either directly to a member of the Ethics and Compliance team, to the WM Legal Department, to the Chief Compliance and Ethics Officer, or to WM's Executive Vice President, General Counsel and Secretary. Reports may also be made through the WM Integrity Helpline at 800-265-9381 or its website (ethics@wm.com), both of which allow anonymous reporting as permitted by applicable law. Employees who fail to report actual or suspected misconduct may be deemed in violation of this Policy as permitted by applicable law. WM

will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

Any violation of this Policy may be grounds for disciplinary action, up to and including termination, subject to applicable law. Violation of applicable laws may also result in criminal prosecution of responsible individuals.

5. Safety Policy

At Waste Management, safety is a core value and a cornerstone of operational excellence. This philosophy is embedded in the way we work, the decisions we make and the actions we take.

With more than 50,000 employees and over 25,000 trucks on the road every day, we fully recognize our responsibility to protect our employees, our communities and our customers. Our goal is to attain world-class safety and, more importantly, to be among the safest companies in our industry. Our plan of action is called Mission to Zero (M2Z), which means zero tolerance for unsafe actions, unsafe decisions, unsafe conditions, unsafe equipment and unsafe attitudes.

- The cornerstone of M2Z is training, which provides classroom and on-the-job site instruction in safety fundamentals for supervisors, drivers and helpers. Operations Rule Book, Driving Science Series videos and Electronic Observation Behavior Assessments are just a few of the tools available to our frontline managers to help them to develop our employees.
- M2Z seeks to enhance understanding, change behaviors and develop company leaders who can make a difference and train and lead others. M2Z does not seek to find fault or punish people.
- M2Z is about being hard on facts and easy on people.

Waste Management sites continuously monitor and measure safety performance. The resulting measurements reflect the reduced frequency and severity of safety incidents, improved employee and customer satisfaction. Through established safety processes and procedures, our goal of zero accidents and injuries is transformed into measurable results that have a positive impact on thousands of people.