

Waste Management Policy

Human Rights

May 2020



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 Board members, 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. WM is an equal opportunity employer and is committed to maintaining a workplace environment free from discrimination. Employment decisions are made by placing the most qualified person in each job without regard to race, color, sex, pregnancy, sexual orientation, gender identity, relation, marital status, age, national origin, disability, genetic information, veteran status, citizen status or other protected group status as defined by federal, state or local laws.

This policy is guided by the Ten Principles of the United Nations Global Compact and is in accordance with: 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.

IMPLEMENTATION

The WM Code of Conduct is the means to implement its Human Rights Policy, human rights values and commitments. 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. 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. Actions and procedures to implement the policy include awareness and training, contract language, due diligence, third-party anonymous ethics reporting, organizational accountability, and regular review. ...

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.