

# Waste Management Policy

# Supplier Code of Conduct

April 2020



## TO OUR VALUED CONSULTANTS, CONTRACTORS AND SUPPLIERS

We have established a set of guidelines to assist our consultants, contractors and suppliers in adhering to ethical business standards. Waste Management conducts its business in alignment with the United Nations Global Compact's Ten Principles, which can be accessed via the link <https://www.unglobalcompact.org/what-is-gc/mission/principles>, and expects you to respect the same principles. As you are an integral part of our success, Waste Management ("Waste Management" or "Company") expects you to comply with all required laws and regulations and avoid any activities that might lead to the appearance of conflicts or improper conduct. Please review and use this Supplier Code of Conduct ("Code") as guidance in conducting all of your business and interactions with, on behalf of, or otherwise related to Waste Management. Should you require further guidance or have a question, please utilize the Waste Management Integrity Helpline listed below..

## BUILDING MUTUAL TRUST AND RESPECT

In working together, we emphasize teamwork, dignity, and mutual respect. Verbal or physical conduct that unreasonably disrupts others at work is harassment. Waste Management expects everyone working on behalf of the Company to treat others with dignity, respect, and fairness. Waste Management is an equal opportunity employer and is committed to an environment free from discrimination. Consultants, contractors and suppliers are expected to comply with all applicable laws concerning discrimination in hiring and employment practices.

## CONFLICT OF INTERESTS

You must take care that your personal business relationships never influence the decisions you make for Waste Management. You must report any relationships that could cast doubt on your ability to act with total objectivity with regard to Company's interests to the Ethics and Compliance Department and any relationship, which might be viewed as a conflict of interest, must be disclosed to the Ethics and Compliance Department.

## PROTECTION OF COMPANY ASSETS AND CONFIDENTIAL INFORMATION

The assets of Waste Management are intended to be used in ways that benefit the Company. The use of Company time, equipment, computer network, supplies, and facilities for personal reasons, or taking Company-owned equipment off Company premises for personal use is not allowed. You are prohibited from taking, or directing another company to take, a business opportunity discovered through the use of Waste Management's property, information, or your position at the Company. You are also prohibited from using Waste Management's property, information, or your position for personal gain and from competing with Waste Management. You must protect Waste Management's confidential and proprietary information that you may have access to and ensure that it is not shared with or disclosed to any unauthorized parties.

## GIFTS AND ENTERTAINMENT

You must never offer, give or accept gifts that would appear to undermine or influence good business judgment. You must never solicit any favors while representing Waste Management. On occasion, you may accept or provide novelties, promotional items of a nominal value, or modest gifts if:

- The gift complies with Waste Management's Gift and Entertainment policy.
- This happens only occasionally.
- The gift was not solicited.
- Open disclosure of the gift would not embarrass Waste Management or the people involved.
- The gift is not given to a governmental official or employee.
- The value of the gift is under \$100 (U.S.)

You may offer or accept in connection with your work for Waste Management an occasional invitation to a sporting activity, entertainment, or meal if:

- The gift complies with Waste Management's Gift and Entertainment Policy.
- The activity is infrequent and of reasonable and not excessive value.
- The disclosure of the activity would not embarrass Waste Management or the people involved.
- The entertainment is approved by the recipient's supervisor at Waste Management.

Travel and accommodations for entertainment are generally not reimbursable unless previously approved in writing by Waste Management.

### **APPROVAL PROCESS**

The following types of "high profile" events must be approved by a member of Waste Management's Senior Leader Team AND the Chief Compliance Officer prior to acceptance:

- Highly popular concert or sporting event, such as:
  - o Super Bowl
  - o Major Golf Tournament
  - o NCAA Final Four Basketball Tournament
  - o Other popular and high cost sporting event
  - o Popular concert or cultural event
- Elaborate entertainment, such as:
  - o Expensive hunting trip
  - o Use of vacation home
- Out of town professional conference
- Any other high cost event

Offering or accepting bribes, kickbacks, payoffs or other unusual or improper payments to obtain or keep business is unethical, illegal and strictly forbidden.

### **ACCURACY OF BOOKS AND RECORDS**

Accurate record keeping is critical. Any bills, reimbursement request or cost submitted or billed to Waste Management must have sufficient and accurate supporting documentation. Falsifying information, invoices or records while working on behalf of or for Waste Management is prohibited. All transactions must be properly authorized and completely and accurately recorded, and all reasonable supporting documentation must be provided where required or requested.

### **COPYRIGHTS, PATENTS AND TRADEMARKS**

Our intellectual property is a valuable asset. This includes copyrights, patents, trade secrets and trademarks. We respect and protect intellectual property, whether it belongs to us or to others. You are prohibited from making unauthorized copies of copyrighted written documents or computer software. Waste Management owns all inventions, discoveries, ideas, and trade secrets created by employees, contractors or consultants on the job or produced using Company resources. All confidential and proprietary Waste Management information must be returned to Waste Management upon termination or completion of any work you are performing on behalf of Waste Management.

## **CONFIDENTIAL INFORMATION**

Waste Management is committed to complying with applicable laws concerning proprietary, confidential and personal information. Consultants, contractors and suppliers are expected to comply with all applicable laws and regulations governing the protection, use and disclosure of Waste Management's proprietary, confidential and personal information. Unauthorized disclosures are prohibited.

## **REGULATORY COMPLIANCE**

Waste Management operates in a highly regulated environment. In the U.S., the agencies that regulate our business include the Environmental Protection Agency, Department of Transportation, Internal Revenue Service, Occupational Safety and Health Administration, Department of Labor, and the Securities and Exchange Commission, plus many other federal, state, and local agencies. In Canada, we are similarly regulated. Waste Management expects all its consultants, contractors and suppliers to comply with all applicable laws and regulations in conducting business on behalf of Waste Management. No consultant, contractor or supplier may make a political contribution on behalf of Waste Management. Any political contribution by a consultant, contractor or supplier that gives the appearance of being directly or indirectly associated with Waste Management business is prohibited. A "political contribution" is any direct or indirect payment, distribution, subscription, loan, advance, deposit, or gift of money, services, or anything of value to a government official or employee, or a person running for an elected office, or in connection with an election, or to an organization or group formed to support or defeat a referendum or ballot issue.

There are certain U.S. and local laws that govern our activities in international markets. It is important that any individual conducting business abroad be familiar with these laws and comply fully with them, including the United States Foreign Corrupt Practices Act ("FCPA"), the U.K. Anti-Bribery Act, as well as all local laws related to bribery and corruption in those countries in which we are doing and pursuing business. The FCPA is intended to prevent bribery of foreign officials by American companies and their foreign subsidiaries. The U.K. Anti-Bribery Act is even broader in scope and applies to the payment or receipt of a bribe. The FCPA and Company policy prohibit payments (including cash or anything of value, such as gifts or services) either directly or indirectly or through a third party to foreign officials for the purpose of obtaining or maintaining business or favorable government action. Waste Management has adopted an Anti-Bribery and Corruption policy, and established an FCPA Compliance Committee. In conjunction with performing any services on behalf of Waste Management, the Company expects all its consultants, contractors and suppliers to comply with all aspects of these laws or any other applicable laws.

## **COMMUNITIES AND ENVIRONMENT**

Waste Management strives to be a trusted and valued community partner by improving the quality of life in the areas in which we live and work. We expect our contractors, consultants and suppliers to be good corporate citizens and safeguard our environment and natural resources.

## **SAFETY**

Safety is our primary goal at Waste Management. All contractors, consultants and suppliers are responsible for ensuring that their operations are conducted safely. You are expected to observe all safety rules and practices and to follow instructions concerning safe and efficient work practices.

## **INTEGRITY HELPLINE**

WM is committed to a SPEAK UP culture where you SPEAK UP and we LISTEN UP and FOLLOW UP. You can report any issues or concerns by contacting a member of our management team, the Legal Department, the Compliance and Ethics Department (1-800-633-7871 ext. 1414 or at [ethics@wm.com](mailto:ethics@wm.com)) or via the Company's toll-free Integrity Helpline at 800-265-9381. For international locations, the toll-free number is 00-800-2659-3810. The Integrity Helpline is maintained by a third party where reports can be made anonymously 24 hours a day, 7 days a week. Waste Management strictly prohibits any form of retaliation against someone who SPEAKS UP in good faith.

## QUESTIONS

Contact the Waste Management Compliance and Ethics Department at 1-800-633-7871 X1414 or via e-mail at [ethics@wm.com](mailto:ethics@wm.com).

Note: This Code contains information pertaining to certain Waste Management policies and practices. We expect the recipients to read this Code carefully as it is a valuable reference for understanding your work responsibilities. Nothing contained in this Code shall be construed as constituting a contract or as creating any contractual obligations on the part of the Company nor does anything in this Code expand or increase your legal rights or the Company's legal obligations.