



## 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](mailto: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.