



## 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. As you are an integral part of our success, Waste Management (“Waste Management” or the “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 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 INTEREST

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 the 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:
  - Super Bowl
  - Major Golf Tournament
  - NCAA Final Four Basketball Tournament
  - Other popular and high cost sporting event
  - Popular concert or cultural event
- Elaborate entertainment, such as:
  - Expensive hunting trip
  - 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 Health and Safety 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.

## 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

You have an obligation to report any known or perceived violation of laws, regulations, our policies or our Code of Conduct. You can report issues confidentially and/or anonymously via the Company's toll-free Integrity Helpline at 800-265-9381. For international locations, the toll-free number is 00-800-2659-3810.

## QUESTIONS

Contact Waste Management Ethics and Compliance department at 1-800-633-7871 X6554 or via e-mail at [ethics@wm.com](mailto:ethics@wm.com).

Note: This Code of Conduct 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.