



WM Human Rights & Modern Slavery Policy

Last Revised: 2024

PURPOSE:

WM (“Company” or “WM”) is committed to respecting and promoting human dignity and human rights in WM business practices. WM is also committed to a work environment that is free from human trafficking and slavery in all parts of the WM organization.

This policy reflects WM’s Human Rights and Modern Slavery Policy and WM’s core values to protect and advance human dignity and human rights in our business practices. WM’s policies and practices are guided by the United Nations’ Declaration of Human Rights, the International Bill of Human Rights, the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work and all applicable local laws.

SCOPE:

This policy applies to all personnel employed by or engaged to provide services to any WM entity, including, but not limited to, WM’s employees, officers and Board members, and contingent and temporary workers, as well as WM’s vendors, partners, contractors, and suppliers (“Applicable Parties”).

HUMAN RIGHTS POLICY:

WM’s relationships with the Applicable Parties 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’s Human Rights and Modern Slavery Policy 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, religion, marital status, age, national origin, disability, genetic information, veteran status, citizen status or other protected group status as defined by federal, state, provincial, or local laws. WM’s Human Rights and Modern Slavery Policy is the means by which WM implements its human rights values and commitments.

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. WM values and advances the inclusion, equity, and diversity of the people with whom it works. WM is committed to equal opportunity and does not tolerate discrimination or harassment. WM adheres to minimum age requirements, supports freedom of association and respect for collective bargaining, and compensates employees fairly. WM works to ensure full compliance with applicable wage and hour laws. 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.

WM expects that Applicable Parties will comply with the law in each place in which WM does business, and that they will abide by WM's [Code of Conduct](#) or, as applicable, WM's [Supplier Code of Conduct](#). Implementation of compliance with the Code of Conduct and Human Rights and Modern Slavery Policy is overseen by the Vice President, Chief Compliance and Ethics Officer and WM trains all employees on its Code of Conduct.

WM's goal is to conduct business with those who share its commitment to these same principles. WM will continue to require commitment to respect for human rights from all Applicable Parties.

POLICY AGAINST HUMAN TRAFFICKING AND MODERN SLAVERY:

WM strictly prohibits human trafficking, forced labor, child labor or any form of modern slavery within WM's organization or within the organizations of WM's suppliers and subcontractors. Upholding the highest ethical standards is paramount to WM, and WM expects that WM employees and others through whom WM conducts business must not engage in any practice that constitutes trafficking in persons or slavery. WM expects all applicable parties to adhere to all applicable laws including the requirements of Section 307 of the Tariff Act of 1930, as amended (19 U.S.C. § 1307) (US), the Countering America's Adversaries Through Sanctions Act (US), the Uyghur Forced Labor Prevention Act (US), and the Fighting Against Forced Labor and Child Labor in Supply Chains Act (Canada).

TRAINING:

WM is committed to providing employees with an annual Code of Conduct training. This training is updated annually to cover a rotation of topics. In addition, WM will periodically provide targeted training that will include topics related to human rights and modern slavery to select employees.

SUPPLY CHAIN TRANSPARENCY:

WM is committed to maintaining transparency and ethical practices in its supply chain. As part of our contracting practice, Suppliers are required to undergo appropriate background screenings and comply with all applicable employment and labor legislation. International Suppliers are required to be reviewed through our International Compliance process which would include a general review of any statutory and international violations.

RISK ASSESSMENT AND MANAGEMENT:

WM will conduct regular risk assessments to identify areas of high risk for forced labor or child labor, including comprehensive reviews of its own labor practices and those of its suppliers. WM will modify its procurement practices to work to eliminate the risk that any suppliers or subcontractors are engaged in the use of forced labor or child labor.

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 a member of the Compliance and Ethics team (ethics@wm.com), to the WM Legal Department, to the VP, Chief Compliance & Ethics Officer, or to VP General Counsel. Reports may also be made through the WM Integrity Helpline at 1-800-265-9381 (U.S. and Canada) or 001.877.801.2359 (India) or its website (wm.com/speakup), which is maintained by a third party and allows for 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 anyone for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report. However, any employee who violates this Policy, makes a complaint in bad faith, maliciously and/or without a reasonable and probable basis, who engages in a reprisal against an employee for filing a complaint and/or participating in an investigation, or who knowingly interferes with an investigation pursuant to this Policy will be subject to discipline, up to and including termination of employment. Violation of applicable laws may also result in criminal prosecution of responsible individuals.

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 with any investigation or audit.

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

ADMINISTRATION

WM is committed to continuously improving its policies and practices to ensure compliance with human rights laws and to prevent and reduce the risk of human trafficking, forced labor and child labor. This Policy will be reviewed periodically and may be modified to ensure its continued relevance and effectiveness in addressing these issues.

This Policy will be communicated to all employees and Applicable Parties, and WM will take necessary steps to ensure that it is effectively implemented and enforced.