

SUPPLIER CODE OF CONDUCT



July 23, 2024

At Waste Connections, Inc. and its subsidiaries, operating divisions, and affiliates (collectively, the “Company”, or “Waste Connections”), we have established a set of guidelines to ensure our consultants, contractors, and suppliers (“Suppliers”) adhere to ethical business standards. We strive to work with Suppliers who demonstrate a similar commitment to their employees through the implementation of proactive health and safety practices, and who demonstrate environmental stewardship by embracing sustainable practices aimed at minimizing their environmental impact. We expect our Suppliers in our supply chain, and their downstream suppliers, to comply with this Supplier Code of Conduct (“Code”), hold to our same high standards, and embrace the following social, environmental, and ethical responsibilities.

Supplier’s Conformance with Code of Conduct

- Because Suppliers are an integral part of our success, we expect them to comply with all required laws and regulations and avoid any activities that might lead to the appearance of conflict or improper conduct. Please review and use this Code as guidance in conducting business and interactions with, or on behalf of, or otherwise related to Waste Connections. Should you require further guidance, refer to Waste Connections Ethics and Compliance Hotline at <http://www.wasteconnections.ethicspoint.com/> or (877) 797-3674.

Conflict of Interest

- Suppliers are required to always act in the best interest of Waste Connections. Suppliers must never allow their personal or other business relationships to influence, or appear to influence, the decisions they make for Waste

Connections. Suppliers must report any relationships that could cast doubt on their ability to act with total objectivity with regard to the Company’s interests. Any relationship that might be viewed as a conflict of interest must be disclosed to the Legal Department through <http://www.wasteconnections.ethicspoint.com/> or (877) 797-3674.

Gifts & Hospitality

- To help ensure that sales of the Company’s products and services are free from any interference or perception that favorable treatment was sought, received or given, no officer, director or employee or member of his or her respective family may (directly or indirectly) accept any gift from a Supplier, unless the gift is consistent with accepted business practice, is of sufficiently limited value and is in a form that will not be construed as a bribe or pay-off. “Gifts” include not just material objects, but also favors that go beyond common courtesies usually associated with accepted business practices and that potentially place the recipient under some obligation to any person soliciting or doing business with the Company. Similarly, no officer, director or employee may (directly or indirectly) give gifts, favors or entertainment to others at the Company’s expense, unless they are consistent with accepted business practice, are of sufficiently limited value and in a form that will not be construed as a bribe or pay-off, and will comply with applicable law, and the circumstances, amount and nature of the gift are such that public disclosure of the gift (including the recipient’s identity) would not embarrass the Company or the recipient’s company.

Labor and Human Rights

- We expect our Suppliers to prohibit the use of all forced labor, human trafficking, and modern slavery. Suppliers shall comply with all applicable local and international laws related to these areas. Suppliers shall not use child labor and shall not employ individuals in violation of any applicable minimum age laws or regulations. The employment of workers below the age of majority as defined and permitted by applicable local law shall not be permitted in hazardous conditions and should only be permitted with the appropriate training in advance of commencing employment. Suppliers are expected to compensate workers according to the applicable wage and remuneration laws, including minimum wages, overtime pay, and mandated benefits, in any jurisdiction where they operate. Suppliers shall not exceed maximum working hours in adherence with applicable local laws. Suppliers are expected to provide a professional and inclusive atmosphere for employees, free of harassment, which promotes equal opportunities and prohibits discriminatory practices.

Accuracy of Books and Records

- Accurate record keeping is critical. Suppliers must keep sufficient and accurate supporting documentation for any bills, reimbursement request or cost submitted or billed to Waste Connections. Falsifying information, invoices or records while working on behalf of or for Waste Connections 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.

Protection of Company Assets and Confidential Information

- Suppliers must use our assets in a way that benefits Waste Connections. 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. Suppliers are prohibited from taking or directing another company to take a business opportunity discovered through Waste Connections' property, information, or an employee's position at the Company. Suppliers must protect the Company's

confidential and proprietary information that they may have access to and ensure that it is not shared with or disclosed to any unauthorized parties. Suppliers must also comply with applicable laws, including intellectual property and data privacy laws. Suppliers must have reasonable information technology security measures in place to ensure the confidentiality, integrity, and availability of Waste Connections' confidential information, and to ensure it is protected against unauthorized access, disclosure, or theft. If a Supplier becomes aware of any actual or possible unauthorized access or disclosure of the Company's confidential information, including a Company employee's or a customer's personal information, it must be reported immediately to <http://www.wasteconnections.ethicspoint.com/> or (877) 797-3674.

Copyrights, Patents, and Trademarks

- Our intellectual property, including trade secrets, patents, trademarks and copyrights, is a critical asset to our operations. We work diligently to protect our intellectual property and the intellectual property of others. Suppliers are prohibited from the unauthorized use, reproduction or distribution of any of Waste Connections' intellectual property, including, but not limited to, copyrighted written documents or computer software. Waste Connections 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 Company information must be returned to Waste Connections upon a project's termination or completion.

Cybersecurity Policy

- Our Suppliers are expected to protect data through reasonable technical and organizational security measures, including technical security tools, restrictions on access to data and physical security measures to help prevent unauthorized or unlawful access, disclosure, loss, destruction, or damage. Like our employees, our Supplier are required to follow all applicable privacy, information security and data protection laws, including the California Consumer Privacy Act and California Privacy Rights Act.

Our policies restrict individuals' access to personal data to those that need access to accomplish a business objective and allow access only for so long as it is necessary. We endeavor to follow data privacy best practices and expect our Suppliers to do the same. Suppliers are expected to notify Waste Connections immediately should any potential data or privacy breaches occur that may affect the Company's information security or data privacy.

Regulatory Compliance

- Our operations in the United States and Canada, including landfills, transfer stations, solid waste transportation, intermodal operations, vehicle maintenance shops, fueling facilities and oilfield waste treatment, recovery and disposal operations, are all subject to extensive and evolving federal, state, provincial and, in some instances, local environmental, health and safety laws and regulations. In the U.S., the agencies that regulate the Company 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.
- 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"), 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 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 Connections expects all Suppliers to comply with all applicable laws and regulations in conducting business on behalf of the Company.

Health and Safety

- Suppliers are responsible for ensuring that their operations are conducted safely. They are expected to observe all safety rules and practices and to follow instructions concerning safe and efficient work practices. Like our employees, our Suppliers are also expected to support and participate in creating a work environment that is focused on health and safety. Together, through teamwork, it is our aspiration to eliminate workplace injuries, accidents, and illnesses.

Environmental and Sustainability

- Waste Connections intends to operate in an environmentally responsible manner to reduce our impact on climate change, conserve natural resources, and comply with applicable environmental laws and regulations. As part of this commitment, we expect our Suppliers to responsibly manage their impact on the environment and our communities. Suppliers must operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment, and they must comply with all applicable federal, state, and local environmental laws and regulations.

Reporting Potential Misconduct

- Suppliers who believe that a Waste Connections' employee, or anyone acting on behalf of the Company, has engaged in illegal or otherwise improper conduct, should report the matter. The Supplier can contact the employee's manager or Waste Connections at <http://www.wasteconnections.ethicspoint.com/> or (877) 797-3674. The Company does not permit retaliation or intimidation against anyone who reports a concern, and a Supplier's relationship with Waste Connections will not be affected by a report of potential misconduct.

Note: 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.