

## Conflict of Interest Policy

This Policy applies to all Waste Management NZ Limited (“WM”) Directors, Executives and Employees, as well as all contractors working for WM (collectively referred to as “WM Employee”) and is designed to ensure that all conflicts of interest are identified, disclosed and managed in a transparent way that promotes confidence in the integrity, legitimacy, impartiality and fairness of Waste Management’s decision-making processes.

Failure to adhere to this Policy may result in disciplinary action which could include termination of employment.

### 1.0 Policy

WM Employee must not engage in activities or hold or trade assets that involve, or could appear to involve, a conflict between their personal interests and the interests of WM without prior disclosure and, where appropriate, approval.

### 2.0 What is a Conflict of Interest?

A Conflict of Interest is a conflict between the employment duties and private interests of an individual, in which the individual has private interests which could improperly influence the performance of their employment duties and responsibilities.

Conflicts of Interest could include (but **are not limited to**):

- a) An employee or employee’s relative having a vested interest in a supplier, customer or competitor of WM;
- b) An employee engaging in secondary employment with another employer which operates in the same industry as WM (customer, supplier, competitor);
- c) An employee having private business interests which may impact the performance of their business activities at WM (e.g.: use of company assets, influence on decision making);
- d) An employee is involved in tender processes where they have links to a potential bidder;
- e) An employee being in a position to influence a decision relating to the employment of a relative or friend at WM;
- f) An employee or employee’s relative having a vested interest or relationship with another WM staff member, a client or a contractor.

### 3.0 Declaring Potential Conflicts of Interest

All WM Employee are required to declare all potential conflicts of interest immediately that they arise, or in the case of prospective employees, during the recruitment process.

Where a conflict arises, it must be disclosed fully to the employee’s manager and the Corporate Counsel through the online form available via the portal. An employee will be notified within two working weeks following their declaration, of any action that needs to be taken. If necessary, disclosures will be elevated to the senior management team for full transparency and so that any conflicts may be managed appropriately to protect WM’s business activities and reputation.

All information provided in accordance with this Policy will be treated in accordance with WM’s [Privacy Policy](#). All disclosed conflicts will be recorded in a register maintained by the CFO.

Potential outcomes of a declaration may include:

- a) Acknowledgement of the declaration and permission to continue in accordance with relevant Company Policy;
- b) Direction not to proceed, or to discontinue (within a negotiated time frame) the declared activity in the interests of protecting WM’s activities and reputation;
- c) Removal of an employee from certain decision-making situations in which they are not impartial; Employees who are permitted to proceed or continue with an external business activity must not use company assets or equipment for external purposes and must comply with WM’s employment obligations at all times.

## 4.0 Responsibilities

Managing conflicts of interest within WM is the responsibility of and requires the involvement of all WM Employee. The particular responsibilities of staff and managers are set out below.

### 4.1 All WM Employee

All WM Employee are responsible for:

- a) Avoiding conflicts of interest where possible, and managing conflicts that cannot be avoided;
- b) Assessing their personal interests to identify whether they conflict, or have the potential to conflict with their WM duties;
- c) Formally disclosing conflicts of interest that may arise in accordance with this Policy;
- d) Raising concerns about potential conflicts of interest that may affect other staff – either by direct discussion with the affected staff member, with your Manager, or by a disclosure under the WM Speak Up Policy;
- e) Complying with all other requirements of this Policy; and
- f) Complying with the Restraint of Trade requirements contained in your Employment Agreement.

### 4.2 Branch Managers / Functional Managers

In addition to the above, all Branch Managers are responsible for ensuring that the employees whom they supervise comply with this Policy.

The effectiveness of this Policy will depend on the degree to which Branch Managers:

- a) Are aware of the conflict risks inherent in the work of the staff members they manage;
- b) Make staff aware of this Policy and procedures for compliance; and
- c) Record receipt of disclosures of conflicts of interest reported to them.

### 4.3 General Managers / Managing Director

In addition to the above, all General Managers and the Managing Director are responsible for ensuring that the managers within their respective Business Units / Division / Function comply with this Policy.

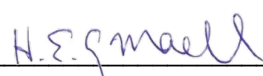
They are required to:

- a) Ensure employees are aware of this Policy and procedures for compliance;
- b) Regularly review disclosures of conflicts of interest reported to them; and
- c) Ensure appropriate action is taken for any potential conflict where necessary.

## 5.0 Contact

If you have any questions relating to this Policy or wish to discuss a potential conflict, call the Corporate Counsel or [CFO](#).

This Policy will be reviewed as per footer date.

  
Approved by the Managing Director

Date; 02 June 2023