

Corporate Code of Conduct

1.0 Introduction

- a) Waste Management NZ Limited ("WM") and its subsidiaries recognises that its reputation is an essential element to its success, and that there is a direct correlation between its reputation and the integrity of the conduct of all those who represent WM.
- b) This Corporate Code of Conduct ("**Code**") is designed to demonstrate WM's commitment to high ethical standards and behaviour in order to maintain confidence in the integrity of WM. With the support of the Board, this code is binding on all directors, employees, contractors and consultants (collectively defined as "**WM Employees**").
- c) The content of this code is not intended to cover all possible situations. Rather, it is a reference guide that sets out certain basic principles that should be followed in all dealings related to WM to ensure that WM's business is conducted in accordance with the laws and regulations of all areas in which it operates. Where circumstances arise that are not covered by this code, WM Employees are encouraged to consult their manager or local [People and Culture representative](#) on an appropriate course of action.

2.0 Promote a Safe and Positive Workplace

- a) WM is committed to providing a safe, healthy and harmonious working environment. All WM Employees are responsible for ensuring that all WM operations are conducted safely, and that the workplace is free from all forms of discrimination and harassment.
- b) WM has implemented appropriate health and safety policies, practices and procedures with the objective of zero harm to our employees and others. All WM Employees are required to follow rules for safe and healthy operations and immediately report any incident which generates an actual or potential injury. They should advise their manager or other relevant management representatives immediately if they see a work practice or activity which they consider to be conducted in an unsafe or careless manner.
- c) WM values the diverse backgrounds of its people and seeks to create an atmosphere of trust, honesty and respect. WM Employees are expected to treat fellow Employees with respect and dignity regardless of gender, race, ethnic origin, religion, marital status or other status. Harassment or discrimination of any kind is not acceptable.

3.0 Enhance the Communities in which we operate

WM takes pride in supporting the communities in which it operates and is committed to building strong community relationships that reflect its values. Additionally, WM is dedicated to providing environmentally beneficial services, products and solutions, and to continually improving our environmental standards. To this end, WM Employees are responsible for understanding relevant [environmental and operating policies](#) and guidelines to ensure that all business activities are carried out with proper regard to the community and the environment.

WM endeavors to ensure all Employees are made aware of relevant legislative and regulatory changes and obligations. WM Employees must take necessary steps to ensure that they fully aware of, understand, and act within in the confines of all relevant laws and regulations covering their individual business areas. If uncertainty regarding the application and interpretation of the law exists, assistance can be sought through the [Legal Department](#).

4.0 Avoid Conflicts of Interest

- a) WM Employee are expected to make decisions that are in the best interests of WM and not for personal gain. WM Employees should 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. Such circumstances could compromise or appear to compromise the ability of WM Employees to make impartial business decisions.
- b) WM Employees must not accept gifts or favours of any significant value or give same to anyone

(including clients or suppliers) even though they may believe it will have no bearing on their actions on behalf of WM. In no circumstances may kickbacks, bribes or other illegal consideration be offered, paid, granted, received or accepted by any WM Employees.

- c) If in any doubt about a conflict of interest, the matter should be discussed with [your ELT manager](#) to ensure it is adequately considered.

5.0 Ensure Integrity of Financial and Other Information

Shareholders, management and other interested parties must have complete and accurate financial information in order to make informed decisions.

Many WM Employees participate in the accounting processes that directly impact on the integrity of external financial statements. WM Employees have a responsibility to act in accordance with relevant accounting policies and disclosure requirements and ensure that financial records are recorded in an accurate and timely fashion. Any known inaccuracies must be immediately reported. Unrecorded or “off the books” transactions must not be undertaken for any purpose or in any circumstances.

6.0 Misrepresentation and False Statements

WM Employees must never make deliberate misrepresentations concerning WM or its business operations.

7.0 Protect Confidential Information

- a) Any confidential information including proprietary, technical and financial information must be protected by WM Employees and should be handled on a strict need to know basis. WM’s trade secrets should be appropriately safeguarded.
- b) WM Employees should also respect the privacy of individuals and the privacy laws in relation to the collection, use and handling of other people’s personal information.
- c) In the course of their work WM Employees may learn of “inside information” about WM and other companies. Employees must not use non-public information for personal profit or discuss such information with anyone who does not have a legitimate business reason to know such information.

8.0 Protection and Use of Property

WM Employees are responsible for the protection and proper use of all WM property used in carrying out their tasks and responsibilities. WM Employees should take reasonable steps to prevent theft, damage or misuse of WM property. This includes the removal by WM Employees of waste products of our customers (scavenging). WM Employees must ensure such property is used efficiently and for business purposes only.

WM property includes tangible items such as inventory, plant and equipment, petty cash, but also includes corporate information and intellectual property such as copyright and trademarks.

9.0 Abide by Competition Laws

- a) All of the business activities in which WM is engaged are highly competitive. It is WM Policy to compete vigorously but fairly. A major part of this commitment is to abide by applicable competition and consumer laws. In general terms these competition laws prohibit WM from collaborating with its competitors to restrain or reduce competition or business rivalry.
- b) WM Employees must abide by competition laws intended to ensure and maintain competition in all markets in which WM operates, and ensure compliance with WM’s Competition and Consumer Law Policies. WM Employees must at all times, act ethically and fairly in their dealings with customers, suppliers and the markets in which WM does business.
- c) If WM Employees are aware of any issues which could give rise to anti-competitive conduct they should consult with their manager or the [Legal Department](#) immediately.

10.0 Seeking Assistance


If you have any questions that are not specifically addressed in this Code or any of the WM policies referred to in this Code, please ask your manager or [People and Culture representative](#) for guidance on whom to contact. The policies supporting this Code are:

- a) [Health and Safety Policy](#)
- b) [Acceptable Workplace Behaviour and Equal Opportunity Policy](#)
- c) [Environmental Policy](#)
- d) [Conflict of Interest Policy](#)
- e) [Privacy Policy](#)
- f) [Safe Driving Policy](#)
- g) [Competition and Consumer Law Policy](#)
- h) [Speak Up Policy](#)

11.0 Compliance with Policy

Failure to adhere to WM's Code of Conduct may result in disciplinary action which could include termination of employment. If you are aware of any serious misconduct or unethical behaviour that contravenes this Code, any WM policies or the law, you should report this to your manager or make a report under the [WM Speak-up notification service](#). This service is fully independent (managed externally). Full details on how to use this service can be found in the Speak Up Policy.

This code will be reviewed as per the footer date


Approved by the Managing Director

Date: 03/05/2022