



**WASTE CONNECTIONS**  
*Connect with the Future®*

**Joint Forced Labour and Child Labour Report**

**January 1, 2023 – December 31, 2023**

**Dated: April 23, 2024**



This Joint Force Labour and Child Labour Report (the “**Report**”) is prepared to address the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the “**Act**”) for:

- Waste Connections, Inc. (“**Waste Connections, Inc.**”)
- WCN Holdings, Inc.
- WCI Global Holdings ULC
- WCI North Investments, GP
- WCI South Investments LP
- Waste Connections of Canada Inc.
- Complexe Enviro Connexions Ltee.
- Les Entreprise Raylobec Inc.
- Services Environnementaux Richelieu Inc.
- Entreprise Sanitaire F.A. Ltee
- Ridge (Chatham) Holdings LP
- Loraas Disposal North Ltd.

(collectively, the “**Reporting Entities**”, “**Waste Connections**” or the “**Company**”)

The Report outlines the steps taken by the Reporting Entities during their previous financial year starting January 1, 2023, and ending December 31, 2023 (the “**Reporting Period**”) to prevent and reduce the risk that forced labour or child labour is used at any step of their supply chains.

### **Structure, Activities and Supply Chains**

#### **Structure and Activities of the Reporting Entities**

Waste Connections, Inc. is a publicly traded company on the New York Stock Exchange and Toronto Stock Exchange and is the third largest solid waste services company in North America, providing non-hazardous waste collection, transfer and disposal services, including by rail, along with resource recovery primarily through recycling and renewable fuels generation, in 46 states in the U.S. and six provinces in Canada. Waste Connections, Inc. also provides non-hazardous oil and natural gas exploration and production, waste treatment, recovery and disposal services in several basins across the U.S and Canada, as well as intermodal services for the movement of cargo and solid waste containers in the Pacific Northwest.

As of December 31, 2023, the employee population for Waste Connections, Inc. and all of its operating affiliates/subsidiaries collectively consisted of 22,539 active employees, including 10,920 commercial truck drivers and 1,927 mechanics. There were 19,231 employees located in the United States and 3,308 employees located in Canada.

The Nominating and Corporate Governance Committee of the Board of Directors of Waste Connections, Inc. (the “**Board**”) is responsible for, among other matters, the development and implementation of Waste Connections, Inc.’s corporate governance principles, including the review of and compliance with its Corporate Governance Guidelines and Board Charter and its Code of Conduct and Ethics. The Nominating and Corporate Governance Committee is responsible for: (i) monitoring the implementation of Waste Connections, Inc.’s Diversity Policy on a periodic basis, and at least annually, to assess its effectiveness, (ii) monitoring and reviewing Waste Connections, Inc.’s progress in achieving its aspirational Environmental, Social and Governance related (ESG) targets and reporting the results to the Board and (iii) making recommendations to the Board regarding any revisions to these policies that may be necessary or appropriate. The Board is responsible for reviewing strategy, policies and performance related to Waste Connections Inc.’s management of ESG issues, including reviewing any reports on Waste Connections, Inc.’s performance against ESG targets, any ESG programs, products and disclosures, and any corporate responsibility policies and programs, in coordination with other committees of the Board, as appropriate.

The Reporting Entities consist of Waste Connections, Inc., the publicly traded company, as well as its affiliated holding and operating subsidiaries that provide primarily municipal solid waste, recycling and organics collection, transfer and disposal services in Canada. All of the relevant policies and procedures described herein apply to Waste Connections, Inc. and the other Reporting Entities.

## **Supply Chains**

The Company’s supply chains include a diverse pool of suppliers from which it purchases goods and services for its operations across the U.S. and Canada. In 2023, the largest procurement categories included refuse vehicles, landfill cell development, third party transportation and disposal, fuel and other transportation-related costs. The source countries or regions for the Company’s principal supply chains primarily include Canada and the United States.

## **Policies and Due Diligence Processes**

ESG-related initiatives have been key components of Waste Connections, Inc.’s success since the Company’s inception in 1997. Waste Connections continuously monitors and evaluates new technologies and investments that can enhance its commitment to the environment, to its employees and to the communities it serves. These investments align with Waste Connections’ focus on value creation for all stakeholders and Waste Connections remains committed to expanding these efforts as the solid waste industry and related technology continue to evolve. To that end, Waste Connections, Inc. has committed \$500 million (USD) to the advancement of its long-term, aspirational ESG targets established in 2020. Waste Connections, Inc. provides updates on progress towards achieving these targets in its Sustainability Reports. For additional information visit: [Waste Connections 2023 Sustainability Report](#)

Waste Connections, Inc. recognizes the importance of disclosure surrounding these initiatives and strives to become increasingly transparent through the continued use and adoption of new ESG frameworks, expansion of ESG-related data points, as well as participation at ESG-related industry events and other investor engagements. To further demonstrate its commitment, since 2021, Waste Connections, Inc. has incorporated its ESG targets into executive compensation metrics.

Waste Connections has a culture of strong corporate governance. Waste Connections, Inc. has adopted a Code of Conduct and Ethics that applies to the Company's officers, directors and employees. The Code of Conduct and Ethics outlines the Company's expectations regarding compliance with law and protection of human rights, including:

- **Compliance With Laws, Rules and Regulations** - It is Waste Connections' policy to comply with all laws, rules and regulations applicable to it and its operations. Each officer, director and employee shall adhere to the standards and restrictions imposed by those laws, rules and regulations and is prohibited from taking any action on behalf of Waste Connections that they know or have reason to suspect violates -- or assist any third party in violating -- any law or regulation. Listed below are two areas concerning the Code of Conduct and Ethics that are pertinent to forced and child labour.
  - **Human Rights** - It is the Company's policy and the responsibility of each officer, director and employee to comply with all laws, rules and regulations related to the protection and advancement of human rights, including, but not limited to, laws, rules and regulations governing the use of child labor, compulsory or forced labor and slavery and human trafficking. Waste Connections also has policies regarding safety, equal opportunity, non-discrimination and fair employment. Potential human rights violations or grievances can be reported to Waste Connections, Inc.'s Senior Vice President – People, Training and Development. Monitoring and reporting human rights performance is overseen by the Human Resources Department, including the Senior Vice President – People, Training and Development.
  - **Whistleblowing — Reporting Illegal or Unethical Behavior** All officers, directors and employees should promptly report to senior management all actual or potential illegal or unethical behavior of Company personnel that they observe. The Company encourages and expects full and open communication with senior management. It is the Company's policy and the responsibility of each officer, director and employee to comply with all whistleblower protection laws, rules and regulations.

Waste Connections continues to assess additional due diligence measures it can implement to enhance its processes.

### **Forced Labour and Child Labour Risks**

Waste Connections uses a risk-based approach to identify, assess, and manage human rights related risks, including the risk of forced labour and child labour.

Waste Connections seeks to identify risks based on the supplier, the product, and the country of production. The Company is evaluating methods to implement a systemic approach to forced labour and child labour risk identification, assessment and management, including additional training for employees, the implementation of a Supplier Code of Conduct and continuously reviewing and enhancing contractual terms with suppliers.

In our operations, we have assessed the risk of forced labour and child labour to be low due to the nature of our supply chain, contracting processes, service-oriented business model and location of operations.

### **Risk Assessment and Identification**

The Company maintains the ability to constantly assess supply chain risk through its contractual practices, and retains, under a number of its contracts, the right to conduct supplier compliance audits when necessary. To the extent a supplier contractual violation is identified and the supplier is unable or unwilling to remediate any non-compliance issue, the Company retains the right, in most instances, to invoke remedies (which may include termination) to address issues of non-compliance.

### **Risk Management and Mitigation**

Waste Connections is actively working to manage human rights issues throughout its decision-making processes and through specific actions. All employees, officers and directors are required to review and sign our Code of Conduct and Ethics, which outlines Waste Connections' expectations concerning behaviour by employees in their interactions with various stakeholders (including suppliers) and specifically Waste Connections' commitment to respecting human rights including forced or child labour.

In addition, Waste Connections is currently in the process of implementing a Supplier Code of Conduct which will expressly outline the Company's expectations that all of its suppliers must uphold human rights within their operations and provide standards that protect human rights including ensuring its suppliers adhere to safe working conditions for their workforce.

### **Training**

Upon implementation of the Supplier Code of Conduct, the Company intends to provide training for its employees on the expectations the Company has with respect to supply chain management and upholding human rights.

### **Remediation Measures**

Waste Connections has not been made aware of any instances of forced labour or child labour occurring in the Reporting Entities' supply chain in the Reporting Period and therefore no measures have been taken in this area.

### **Remediation of Loss of Income**

Waste Connections has not been made aware of any instances of forced labour or child labour occurring in the Reporting Entities' supply chain in the Reporting Period and therefore no measures have been taken in this area.

### **Assessing Effectiveness**

To ensure that Waste Connections' supply chain quality standards are met, Waste Connections intends to:

- Implement a Supplier Code of Conduct; and
- Create additional training for its employees.

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### **Authority of Report**

The Board of Directors of Waste Connections, Inc. confirms as of April 23, 2024 this report as being a joint report of Waste Connections, Inc., WCN Holdings, Inc., WCI Global Holdings ULC, WCI North Investments, GP, WCI South Investments LP, Waste Connections of Canada Inc., Complexe Enviro Connexions Ltee., Les Entreprise Raylobec Inc., Services Environnementaux Richelieu Inc., Entreprise Sanitaire F.A. Ltee, Ridge (Chatham) Holdings LP, and Loraas Disposal North Ltd. for the financial year ended December 31, 2023, in accordance with subparagraph 11(4)(b)(i) of the Act.

In accordance with the requirements of the Act, and in particular Section 11 thereof, I attest that I have reviewed the information contained in the Report for the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Ronald J. Mittelstaedt  
President, Chief Executive Officer and Director

As President, Chief Executive Officer and Director of Waste Connections, Inc., I have the requisite authority to sign this report on behalf of Waste Connections, Inc.