



## **Company Overview**

In accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the “Canadian Act”), Waste Management of Canada Corporation (“WMCC”) and WM Québec Inc. (“WM Québec”) (together identified herein as “WM”) issue this joint report outlining the measures implemented to address the risks of modern slavery, including but not limited to forced and child labour within our operations and supply chain. WMCC and WM Québec are affiliated companies operating in Canada. They share certain management services, including supply chain services and the information obtained within this report applies equally to both entities. This report is our first report prepared pursuant to the Canadian Act and is for fiscal year of January 1, 2023 through December 31, 2023 and addresses steps taken by WM in 2023.

At WM, we actively uphold human rights and work to prevent any violation of others’ human rights through our policies, procedures and practices. We are committed to establishing safe, inclusive, and respectful work environments wherever we conduct business. We value the fundamental rights of our employees and all who work within our supply chain, which encompass freedom from slavery and child labour, equal opportunities for all, a safe and healthy workplace, and freedom from discrimination and harassment.

WM is continuing to evaluate the risks associated with modern slavery and to identify areas within our operations and broader supply chain that may be impacted by such challenges. We are focused on collaborating across our business and supply chain to implement appropriate practices that mitigate and address potential risks.

Modern slavery is completely unacceptable within our organization and supply chains. WM acknowledges our responsibility to uphold the rights of individuals working for our organization, as well as those associated with suppliers and business partners who prioritize human rights for their own employees. Recognizing that human rights issues require multifaceted approaches, we consider it crucial to engage with all stakeholders to promote awareness and foster understanding.

# Structure, Operations and Supply Chain

## Our Structure

WMCC is a corporation incorporated under the laws of Nova Scotia. WMCC wholly owns WM Québec, a corporation incorporated under the laws of Canada. Both WMCC and WM Québec have business addresses at 117 Wentworth Crt., Brampton, ON, L6T 5L4. Both WMCC and WM Québec are indirect subsidiaries of Waste Management, Inc., a publicly traded company whose common shares are listed on the New York Stock Exchange.

With over 2000 employees in Canada and revenue exceeding \$40 million in 2023, WM has determined that it meets the threshold for what is considered an "entity" under the Canadian Act.

## Our Operations

WM is a leading provider of comprehensive environmental solutions in Canada. Its solid waste business focuses on distinct geographic areas and provides collection, transfer, disposal, recycling and resource recovery services. WM provides collection, recycling and disposal services to millions of residential, commercial, industrial and municipal customers in Quebec, Ontario, Alberta, Manitoba and British Columbia. With its best-in-class capabilities in recycling, organics and renewable energy, WM partners with customers to help them achieve their sustainability goals.

WM's main business focus is that of providing full-service waste solutions to its customers. Any goods WM imports into Canada are almost exclusively for use by WM in its operations. Our main suppliers provide a range of goods including equipment used in its operations, such as trucks, loaders, dozers and forklifts and parts for equipment, as well as services we require, such as benefits administration, employment process administration and training.

## Our Supply Chains

WM's supply chain involves purchasing a limited range of goods and services predominantly sourced from the United States of America and Canada for use in its operations. WM's principal supply chain includes U.S. and Canadian suppliers with large contracts including chemicals, equipment and parts, lubricants, plastic containers and parts, steel containers and parts, trucks and truck parts and promotional items, such as apparel. WM adheres to a fair sourcing process whenever possible while managing its supply chain effectively. WM continually strives to identify, assess, and monitor areas in its supply chain where there may be risks of modern slavery, human trafficking and child labour.

## **Policies and Due Diligence Processes to Prevent and Reduce the Risk of Forced Labour and Child Labour**

WM supports the goals of the Canadian Act and takes seriously its responsibility to act with due diligence to avoid infringing on the human rights of others and to prevent and reduce the risk of forced labour and child labour in its supply chains. Through formal policies and procedures, codes of conduct for colleagues and suppliers, comprehensive compliance standards and a robust governance framework, WM strives to uphold the rights of its employees, customers, contractors and suppliers as well as any workers within its supply chain. WM is committed to protecting human rights, founded on a commitment to always Do the Right Thing. The Right Way, and requires its business partners, including suppliers, to do the same.

WM's policies and practices, including those applicable to its supply chain, are informed by the following international and industry-leading standards:

- The United Nations' Guiding Principles on Business and Human Rights (UNGPs) and Universal Declaration of Human Rights
- International Labour Organization Conventions
- Uyghur Forced Labor Prevention Act
- Other local human rights laws and regulations

WM's approach to human rights addresses the risk of modern slavery and is supported by its Code of Conduct, Supplier Code of Conduct, Human Rights Policy and Modern Slavery Policy. These documents set out WM's responsibility and expectations to respect and protect the human rights of its employees, contractors, vendors, suppliers and others with whom it conducts business. The policies and due diligence steps outlined below were used by WM in 2023 to prevent and reduce the risk that forced labour or child labour was used in its supply chains.

### **WM Code of Conduct**

WM's Code of Conduct reinforces our commitment to respecting the dignity of all its employees, contractors, suppliers, customers and the communities it serves. WM is committed to diversity and inclusion. WM's Code of Conduct places special emphasis on the importance of fostering an environment of open and honest communication and encourages everyone to SPEAK UP when confronted with compliance, ethics, legal or other concerns. The WM Code of Conduct also focuses on its commitment to protecting and advancing human dignity and human rights to guide its relationships with employees, contractors, vendors, suppliers and others through whom it conducts business, including by addressing human trafficking.

The Code of Conduct is managed by the Compliance and Ethics Department and is reviewed annually and updated as necessary.

## **Supplier Code of Conduct and Contractual Obligations**

WM's supplier relationships are guided by its Supplier Code of Conduct, which sets minimum expectations and guidelines for suppliers, consultants and contractors and obligates them to comply with applicable laws, including those regulations related to forced labour, child labour and human trafficking. To effectuate its suppliers' commitment to the Supplier Code of Conduct, WM supplier contracts generally contain, among other provisions, risk mitigation and enforcement provisions, including audit rights for WM, and an immediate termination right for breach of the Supplier Code of Conduct. If a supplier, contractor or consultant has its own code of conduct that is consistent with WM's commitments to human rights, WM may accept their commitment to abide by their own Code.

WM's Supplier Code of Conduct is managed by the Compliance and Ethics Department and is reviewed annually and updated as necessary.

## **Human Rights and Modern Slavery Policy**

WM has a Human Rights and Modern Slavery Policy, which guides our relationships with employees, contractors, vendors, suppliers and others through whom it conducts business. This policy sets out our prohibition on forced labour, child labour and human trafficking and sets out enforcement mechanisms that WM will take to enforce this prohibition, including investigations and audits.

## **Integrity Helpline**

WM has an Integrity Helpline and associated online web-based reporting portal, which are part of its SPEAK UP | LISTEN UP | FOLLOW UP Culture. WM's Compliance & Ethics Department also has a dedicated phone number and email address where people can SPEAK UP. Allegations of any breaches of its policies or any non-compliant and unethical matters are taken seriously. The Integrity Helpline is also made available to suppliers, contractors, consultants, and the public. The Integrity Helpline is maintained by a third party to which reports can be made anonymously 24 hours a day, 7 days a week. It is also multi-lingual and can be used confidentially online or by calling a toll-free number to submit a report. Retaliation against anyone, including employees, suppliers, contractors, and consultants, for speaking up in good faith is strictly prohibited as specified in the SPEAK UP Policy, Code of Conduct, and Supplier Code of Conduct.

Should WM determine a supplier is in non-compliance with the Canadian Act, or uses, directly or indirectly, forced labour or child labour, WM will notify the supplier of the breach and cease the working relationship until corrective action is put into place.

## **Governance**

WM has a robust governance structure in place to ensure our Human Rights programs, policies and practices are operationalized and effective. WMCC and WM Québec each have a Board of Directors that has oversight of all WM's legal and regulatory compliance programs in Canada. In addition, senior executive level employees partner with a centralized Compliance and Ethics Department to oversee our regulatory compliance and ethics programs. WM also has a centralized Supply Chain department that oversees policies and processes with respect to WM's supply chain.

## **Our Due Diligence Process**

With a primarily North American supply chain and employees and third-party contractors in the United States, Canada and India, we have processes in place to identify and assess the risk of potential human rights issues including the issues relevant to our countries of operation and more broadly across our supply chain. WM participates in an enterprise-wide risk-based due diligence process for screening select international Suppliers to determine risks related to, among other potential concerns, human rights, human trafficking, child labor, and forced labour. Once screened, this process provides WM with continuous monitoring of these screened Suppliers, which will notify WM of any new risks or changes that may have occurred related to these risk areas. WM will continue to review and add suppliers to this screening process.

## **Risks of Forced Labor and Child Labour in Operations and Supply Chains**

Given WM's workforce is predominantly comprised of Canadian citizens, many of whom are unionized, we assessed low risk of child labour or forced labour in our direct operations. Likewise, our direct suppliers are primarily based in the U.S. and Canada and have publicly espoused their commitment to Environmental, Social and Governance (ESG) ("ESG") principals and have affirmatively shared their ESG diligence. We have therefore assessed that our potential exposures to modern slavery practices comes through our secondary supply chain. To mitigate the risk of modern slavery and child labour in the various levels of our supply chain, we expect and frequently contractually require our suppliers, regardless of the cultural, social and economic context, to meet expectations of fundamental rights for all people. This means treating their employees with fairness, respect and dignity, and complying with all laws regarding forced labour and child labour. As outlined above, WM supplier contracts generally contain, among other provisions, risk mitigation and enforcement provisions, including audit rights for WM to ensure the supplier is complying with its legal obligations regarding the prohibition on the use of forced labour and child labor.

## **Measures to Remedy Forced Labour and Child Labour**

WM is not aware of any incidents of forced labour or child labour in our activities or supply chain in our past financial year, subject to the limitations of our risk identification activities as described in more detail above and below. Accordingly, WM has not had to take any remedial measures in response to incidents of forced labour or child labour.

## **Measures to Remediate the Loss of Income to Those Impacted by the Elimination of Forced Labour and Child Labour**

WM has not as of the date of this report become aware of any loss of income to vulnerable families resulting from our measures to eliminate the use of forced labour and child labour in our activities and supply chains.

## **Training Provided to Employees**

WM employees receive required training on the Code of Conduct as part of their onboarding process. In addition, employees receive mandatory annual Code of Conduct training that is updated each year to cover a rotation of topics. This required training is developed internally by the Compliance and Ethics, Human Resources, Legal and Learning & Development departments, in conjunction with specific risk area subject matter experts.

WM periodically provides online targeted international compliance training to its employees whose job responsibilities require them to be familiar with WM's international compliance risks, including leaders and employees in our legal, supply chain, recycling operations, finance, digital, and sales departments. New hires in these roles also receive this training as part of their onboarding. This online training is updated biennially and is required for these employees.

In addition to the online training, WM periodically provides a live (via Teams) International Compliance Overview Training to select leaders and employees in the recycling operations, sales, and supply chain departments that act as business sponsors for our international counterparties. This course is optional and among other risks, in 2023, it included WM's commitment to compliance with all applicable forced labor and modern slavery laws, including the Uyghur Forced Labor Protection Act (UFLPA), and WM's due diligence process for international suppliers, which includes conducting screenings to assess risks related to human rights violations.

## **Assessing Effectiveness of Actions Against Forced Labour and Child Labour**

WM is continually assessing and refining its approach to upholding Human Rights. In 2022, WM participated in an enterprise-wide risk assessment. Part of this assessment evaluated the effectiveness of WM's screening and due diligence procedures for all international counterparties, including whether those due diligence processes addressed risks related to human rights, child labor, and forced labor.

In addition, WM seeks to conduct an annual enterprise-wide internal risk assessment of its international activities. In 2023, this internal risk assessment documented our current risk profile for non-compliance in this risk area and highlighted some of our key risk mitigation efforts related to international trade laws and regulations. The assessment also outlined additional mitigation efforts planned for the coming year.

We will review annually our reporting document and update as necessary to annually review our questionnaire and process to ensure continued compliance and implement any improvements required to ensure we are accurately obtaining and retaining information from our external and indirect suppliers.

## Approval and Attestation

The Report was approved pursuant to subparagraph 11(4)(b)(ii) of the Canadian Act by the Boards of Directors of Waste Management of Canada Corporation and WM Québec Inc.

In accordance with the requirements of the Canadian Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or 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.

I make the above attestation in my capacity as a director of the Board of Directors of Waste Management of Canada Corporation for and on behalf of the Waste Management of Canada Corporation Board.

By signing the below, I hereby confirm I have the authority to bind Waste Management of Canada Corporation.



Tracy Black

President, Waste Management of Canada Corporation  
May 30, 2024

I make the above attestation in my capacity as a director of the Board or Directors of WM Québec Inc. for and on behalf of the WM Québec Inc.

By signing the below, I hereby confirm I have the authority to bind WM Québec Inc.



Tracy Black, President, WM Québec Inc.  
May 30, 2024