



## ANTI-HARASSMENT POLICY

### PURPOSE

The purpose of this Policy is to describe Republic Services, Inc.'s and its subsidiaries ("Republic" or the "Company") approved policies and procedures on sexual and other harassment.

### SCOPE

This policy applies to all employees, vendors, contractors, and visitors of the Company working in the U.S. and its territories (including Puerto Rico and the U.S. Virgin Islands).

### REQUIREMENTS AND RESPONSIBILITIES

#### Policy Statement

The Company does not tolerate any form of illegal harassment, discrimination, intimidation or retaliation in the workplace by any employee or third party (including vendors, contractors, and visitors on Company property).

Consistent with the Company's commitment to providing employees with a rewarding job experience, and in compliance with various laws, the Company will not tolerate harassment against any employee based on the employee's race, color, religion, national or social origin, ethnicity, sex, sexual orientation, gender identity or expression, age, disability, veteran status, relationship, or association with a protected veteran (spouses or other family members), genetic testing or any other classification protected by law, even if the law does not prohibit the conduct. Employees who violate this policy will be disciplined and may be held personally liable for any injury suffered by another employee as a result of such conduct.

Under the law, harassment occurs only when conduct meets certain specific criteria. However, this policy is intended to prohibit all conduct directed at an employee because of race, color, religion, national or social origin, ethnicity, sex, sexual orientation, gender identity or expression, age, disability, veteran status, relationship, or association with a protected veteran (spouses or other family members), genetic testing or any other classification protected by law, even if the law does not prohibit the conduct. This includes conduct or comments that a person would reasonably find offensive. Therefore, jokes or comments about a person's race, religion, color, national origin, sex, sexual orientation, gender identity or expression, age, disability, veteran status, relationship or association with a protected veteran (spouses or other family members), or any other classification protected by law will not be tolerated. Accordingly, the Company may discipline employees who violate this policy even if the employees' conduct does not violate the law.

#### Responsibilities

##### A. Employees

- 1) Every employee is responsible for refraining from conduct or language that could reasonably be viewed as harassment and is expected to report any such conduct to management.
- 2) Employees need to understand that conduct acceptable to them may be offensive to other employees.
  - i. It is the Company's policy to prohibit inappropriate physical touching, sexually explicit language, obscene gestures, staring, sexual or gender-related jokes, display of explicit materials, comments about other employees' bodies, derogatory comments about an individual's sex, sexual orientation, gender identity or expression, repeated requests for dates or other expressions of attraction or sexual interest, and other similar behavior.

##### B. Supervisors

- 1) All supervisors and managers have the responsibility to maintain the workplace free of harassment and are responsible for the full implementation of this policy.

##### C. Human Resources

- 1) Every report of conduct prohibited by this policy will be reviewed by the appropriate Human Resources Manager; Area Director, Human Resources; and/or the Corporate Human Resources Department.
  - i. The review will be conducted on a fair and impartial basis and in a thorough and timely manner. The relevant facts will be evaluated on a case-by-case basis in determining whether an action does, in fact, violate this policy. All such reviews will be documented and conducted in a manner designed to maintain confidentiality and protect the privacy of all parties concerned to the maximum extent permissible under the circumstances.

### General Procedures and Controls

Employees believing that they are or have been subjected to any form of harassment prohibited by this policy are urged to contact their immediate supervisors. However, there may be times when an employee is reluctant to report such conduct to an immediate supervisor. In such cases, the employee should report the conduct to a management representative with whom the employee is comfortable reporting the conduct, such as the Site or Area Manager; the Division or Area Human Resources Manager; the Area Director, Human Resources; a Corporate Human Resources Manager; the Vice President, Human Resources; or by contacting the confidential AWARE Line either by phone at 1-866-3-AWARE-4 or web report at [AWARELine.RepublicServices.com](http://AWARELine.RepublicServices.com). Similarly, any employee who becomes aware of a violation of this policy should report it to one of these parties. In particular, supervisors and managers have the responsibility to promptly report harassment to Human Resources so that the Company may conduct a review and take prompt and appropriate corrective and preventive action. Failure to do so may result in disciplinary action being taken against the supervisor or manager, up to and including termination of employment.

## CONSEQUENCES OF NON-COMPLIANCE

Any Republic employee, regardless of position or title, who violates any provision of this policy, may be subject to disciplinary action, including in certain circumstances termination of employment. Violations by any third party acting on behalf of the Company may result in removal of assignment.

## REPORTING AND PROTECTION FROM RETALIATION

Employees are encouraged to speak up without fear of retaliation when they see or suspect policy violations. Retaliation is prohibited and will not be tolerated at Republic. Retaliation means that an employee is subjected to a negative consequence for reporting a concern under this Policy or participating in an investigation under this Policy.

## DEFINITIONS

Sexual harassment is unique in that it includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature. Under the law, illegal sexual harassment occurs when:

- 1) Submission to such conduct is made, either explicitly or implicitly, a condition of an individual's employment;
- 2) Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- 3) Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

## POLICIES, PROCEDURES AND OTHER RESOURCES

- [Non-Discrimination and Equal Opportunity Policy](#)
- [Code of Business Ethics and Conduct](#)
- [PPM SharePoint Site](#)
- [Speak Up Poster](#)
- [Ethics & Compliance Team \(\[EthicsandCompliance@RepublicServices.com\]\(mailto:EthicsandCompliance@RepublicServices.com\)\)](mailto:EthicsandCompliance@RepublicServices.com)

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POLICY NUMBER: HRS-118

CATEGORY: Human Resources

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POLICY CONTACT(S) AND QUESTIONS: Local Human Resources Manager, Area Director, Human Resources, Corporate Director, Human Resources or Vice President, Human Resources.



# CANADIAN WORKPLACE HARASSMENT, VIOLENCE, AND WEAPONS POLICY AND PROGRAM

## PURPOSE

The purpose of this Policy is to describe Republic Services, Inc.'s and its subsidiaries' ("Republic" or the "Company") approved policies and procedures on the measures taken to support and safeguard the health, safety and security of the Company's employees, visitors, guests, or other individuals on Company property by preventing and addressing Workplace Harassment and Workplace Violence.

## SCOPE

This Policy applies to all employees of the Company working in Canada, as well as all vendors, contractors, and visitors on Company property at any time.

## REQUIREMENTS AND RESPONSIBILITIES

### Policy Statement

Republic's Policy is to provide a safe environment for its employees, visitors, guests, or other individuals on Company property. Workers may not engage in threatening or violent behavior in the Workplace. The Company will not tolerate threats, threatening behavior, or acts of violence against employees, visitors, guests, or other individuals.

The Company does not tolerate any form of harassment, discrimination, intimidation or retaliation in the Workplace by any Worker or third party (including vendors, contractors, and visitors on Company property).

Consistent with the Company's commitment to providing employees with a rewarding job experience, and in compliance with various laws, the Company will not tolerate Workplace Violence or Workplace Harassment. The Company further prohibits all conduct directed at a Worker based on the Worker's race, color, religion, national or social origin, ethnicity, sex, sexual orientation, gender identity or expression, age, disability, veteran status, relationship, or association with a protected veteran (spouses or other family members), genetic testing or any other classification protected by law, even if the law does not prohibit the conduct. Workers who violate this Policy will be disciplined and may be held personally liable for any injury suffered by another Worker as a result of such conduct.

Prohibited conduct includes conduct or comments that a person would reasonably find offensive. Therefore, jokes or comments about a person's race, religion, color, national origin, sex, sexual orientation, gender identity or expression, age, disability, veteran status, relationship or association with a protected veteran (spouses or other family members), or any other classification protected by law will not be tolerated. Accordingly, the Company may take action against Workers who violate this Policy even if their conduct does not violate the law.

### Responsibilities

All Workers are responsible for ensuring that their conduct in the Workplace is appropriate and that they do not engage in Workplace Harassment or Workplace Violence. Workers are also responsible for reporting incidents of Workplace Harassment or Workplace Violence that they witness or experience in accordance with this Policy.

#### A. Employees

- 1) All Workers, including employees, must immediately notify Management of any Policy violations that they have witnessed, received or which they have become aware. This includes behavior which they regard as threatening or violent, when that behavior is job-related, might be carried out on a Company property or is connected to Company employment or operations.
- 2) Workers need to understand that conduct acceptable to them may be offensive to other Workers.

- i. It is the Company's policy to prohibit inappropriate physical touching, sexually explicit language, obscene gestures, staring, sexual or gender-related jokes, display of explicit materials, comments about other Worker's bodies, derogatory comments about an individual's sex, sexual orientation, gender identity or expression, repeated requests for dates or other expressions of attraction or sexual interest, and other similar behavior.

B. Supervisors

- 1) All supervisors and managers have the responsibility to maintain the workplace free of Workplace Harassment and Workplace Violence and are responsible for the full implementation of this Policy.

C. Human Resources

- 1) Every report of conduct prohibited by this Policy will be reviewed by the appropriate Human Resources Manager; Area Director, Human Resources; and/or the Corporate Human Resources Department in accordance with this Policy.

Firearms and Other Weapons

- A. Except to the extent the following is overridden by applicable law, no Worker may possess a firearm or other prohibited weapon in the Workplace. Prohibited weapons include, but are not limited to, guns, knives, or swords with blades over four inches in length, tasers or similar devices, explosives, and any chemical whose purpose is to cause harm to another person.
- B. This Policy does not prohibit the use of pyrotechnic devices or other approved means for bird control at landfills.

**CONSEQUENCES OF NON-COMPLIANCE**

Any Worker, regardless of position or title, who violates any provision of this Policy, may be subject to corrective action, including in certain circumstances termination of employment without prior notice or payment in lieu of notice. Violations by any third party acting on behalf of the Company may result in removal of assignment. Workers will not be penalized or disciplined for reporting in good faith an incident or for participating in an investigation involving Workplace Harassment and/or Workplace Violence. However, if the Company believes that a false or malicious accusation of Workplace Harassment or Workplace Violence was knowingly made by a Worker, that Worker may also be subject to corrective action, up to and including termination of employment without notice or payment in lieu of notice.

**REPORTING AND PROTECTION FROM RETALIATION**

Workers are encouraged to speak up without fear of retaliation when they see or suspect Policy violations. Retaliation is prohibited and will not be tolerated. Retaliation means that a Worker is subjected to a negative consequence for reporting a concern under this Policy or participating in an investigation under this Policy.

**DOMESTIC VIOLENCE**

The Company is committed to reducing the risk of domestic violence occurring in the Workplace. Employees who are at risk or who believe that they are at risk of being subjected to domestic violence in the Workplace may be eligible for a leave of absence or other support.

The Company will take all reasonable precautions to protect Workers, in the Workplace, from domestic violence, including cooperating fully in the enforcement of any orders of protection.

Other Remedies

A Worker does not forfeit the right to pursue any other legal avenues that may be available by virtue of participating in the Company's investigatory process. For example, this Policy does not prevent or discourage a Worker from filing a complaint with the applicable Human Rights Tribunal on a matter relating to applicable human rights legislation.

The Company also reserves the right to take action as necessary for the protection of its Workers or its business without following the investigation process set out in this Policy.

Further Assistance

If a Worker needs further assistance, he or she may contact the Human Rights Legal Support Centre.

## DEFINITIONS

**Psychological Harassment** - means any vexatious behaviour in the form of repeated and hostile or unwanted conduct, verbal comments, actions or gestures, that affects an employee's dignity or psychological or physical integrity and that results in a harmful work environment for the employee. For greater certainty, psychological harassment includes such behaviour in the form of such verbal comments, actions or gestures of a sexual nature. A single serious incidence of such behaviour that has a lasting harmful effect on an employee may also constitute psychological harassment.

**Worker** - means persons who perform services for the Company, including all employees and independent contractors.

**Workplace** - includes any place where Workers engage in Company business, activities or social events, including all Company-owned, operated, or leased land, vehicles, and buildings, including surrounding areas such as sidewalks, walkways, driveways, and parking lots.

**Workplace Harassment** - means engaging (i) in a single incident or a course of vexatious comment or conduct against a Worker in a Workplace that is known or ought reasonably to be known to be unwelcome; or (ii) Workplace Sexual Harassment; or (iii) Psychological Harassment. Workplace Harassment may (but does not necessarily) relate to the prohibited grounds of discrimination as set out in applicable human rights legislation.

Note: Reasonable action taken by the Company, management or a supervisor relating to the management and direction of Workers or the Workplace is not Workplace Harassment. This is the case even if there are sometimes unpleasant consequences for a Worker.

**Workplace Sexual Harassment** – means:

- A. engaging in a course of vexatious comment or conduct against a Worker in a Workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome; or
- B. making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the Worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Workplace Sexual Harassment includes unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature.

**Workplace Violence** - includes:

- A. the exercise of physical force by a person against a Worker, in the Workplace, that causes or could cause physical injury to the Worker;
- B. an attempt to exercise physical force against a Worker, in the Workplace, that could cause physical injury to the Worker; and
- C. a statement or behaviour that is reasonable for a Worker to interpret as a threat to exercise physical force against the Worker, in a Workplace, that could cause physical injury to the Worker.

## POLICIES, PROCEDURES AND OTHER RESOURCES

- [Canadian Workplace Harassment, Violence, and Weapons Procedures](#)
- [Active Assailant Response Training](#)
- [Non-Discrimination and Equal Opportunity Policy](#)
- [RSOC \(866-RSG-RSOC; 866-774-7762\)](#)
- [Security SharePoint Site](#)
- [Code of Business Ethics and Conduct](#)
- [PPM SharePoint Site](#)
- [Speak Up Poster](#)
- [Ethics & Compliance team \(EthicsandCompliance@republicservices.com\)](mailto:EthicsandCompliance@republicservices.com)

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