



Sustainability in Action

# CANADA'S FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT

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2025 ANNUAL REPORT  
JANUARY 1, 2024 – DECEMBER 31, 2024

*This Forced Labour and Child Labour in Supply Chains Report (the "Report") is a joint report prepared to address the requirements of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act") for:*

*Stablex Canada, Inc. ("Stablex") and Southern Sanitation, Inc., ("Southern Sanitation") (collectively referred to herein as "Republic Services")*

## Company Overview and Structure

Stablex and Southern Sanitation are both indirect subsidiaries of Republic Services, Inc., Stablex is a corporation incorporated under the laws of Canada with operations in Blainville, Quebec. Southern Sanitation is a corporation incorporated under the laws of Ontario, with operations in southern Ontario.

Republic Services, Inc. is a publicly-traded company whose common shares are listed on the New York Stock Exchange. Through its subsidiaries, it is a leader in the environmental services industry in North America, providing a comprehensive set of products and services, including recycling, solid waste, special waste, hazardous waste and field services. The company's industry-leading commitments to advance circularity and support decarbonization are helping deliver on its vision to partner with customers to create a more sustainable world. Republic Services employs 590 employees in Canada and had revenues in excess of \$40 million in 2024.

At Republic Services, we consistently deliver on our promises and prove ourselves to be a reliable business partner and committed steward of the environment. Just as important as what we do, is how we do it. We deliver these results by acting with integrity and making our values a part of everything we do. By living our values every day, we build trust with our people, shareholders, customers, suppliers, and communities.

### Activities and Supply Chains

Republic Services is committed to conducting business ethically and lawfully across our supply chain. We choose to do business with suppliers who demonstrate a strong commitment to highly ethical behavior. We expect our suppliers to conduct their business in accordance with the highest ethical standards.

To support Canadian operations, Republic Services maintains a supply chain primarily focused on procuring goods and services from suppliers in Canada and the United States. Key components of the company's supply chain include contracts with Canadian and U.S. vendors for essential items such as chemicals, equipment, lubricants, containers (plastic and steel), and vehicles.

Republic Services is committed to implementing fair sourcing practices throughout its supply chain management processes. The company actively works to identify, assess, and monitor potential risks related to modern slavery, human trafficking, and child labour within its supply chain, demonstrating its dedication to ethical business practices and corporate responsibility.

## Steps Taken to Prevent and Reduce the Risk of Forced Labour and Child Labour

Republic Services has a zero-tolerance approach to modern slavery in our organization and our supply chain. We prohibit the use of all forms of forced labour and any form of human trafficking. We further prohibit the hiring of individuals that are under 18 years of age. As part of our contracting processes with Suppliers, we include in our Supplier Code of Conduct, a specific prohibition against the use of forced labour, child labour, corporal punishment, and any form of human trafficking. Suppliers also must pay workers in accordance with applicable wage and remuneration laws, including minimum wages, overtime hours and mandated benefits in any jurisdiction where they operate.

Republic Services has established frameworks to ensure that we prevent and reduce the risk of forced and child labour. We have outlined key frameworks below that support this commitment.

### **Policy Framework:**

We have a robust policy framework that explicitly prohibits forced and child labour within our operations and supply chains. It is Republic Services' policy to comply with all laws, rules, and regulations applicable to it and its operations. We require our employees and Suppliers to adhere to our standards and policies, which are created in compliance with applicable laws, rules, and regulations. Below we have included our policies relevant to forced and child labour. Each of these also include how to report suspected illegal or other improper conduct.

- [Code of Business Ethics and Conduct](#)
- [Supplier Code of Conduct](#)
- [Human Rights Policy](#)

We also have internal Procurement policies that establish our expectations related to the procurement of goods and services. These policies guide employees to achieve appropriate sourcing of Suppliers.

### **Due Diligence Process:**

- Our due diligence procedures involve regular assessments of Suppliers to ensure compliance with our standards. We also monitor our Suppliers and take appropriate action if misconduct is found. Suppliers receive a copy of our Human Rights Policy and our Supplier Code of Conduct to ensure these expectations and standards are communicated.
- Republic Services has a third-party risk management (“TPRM”) program that involves multiple stakeholders to ensure comprehensive oversight and risk mitigation. Key stakeholders include Risk Management, Business Continuity, Legal, Procurement, Cybersecurity, business owners, and the Ethics & Compliance function. Together, these stakeholders ensure a comprehensive approach to managing risks associated with third-party relationships, including the assessment of forced labour and child labour risks among other human rights.

### **Training Program:**

We conduct training sessions for all employees, including an annual training on our Code of Business Ethics and Conduct. Our training program focuses on key issues and promoting ethical practices.

### **AWARE Line**

We strive to maintain an ethical culture in which employees, Suppliers, and other third parties can report concerns without fear of retaliation. This includes raising concerns about potential violations of our Code of Business Ethics and Conduct and related policies, including our Human Rights Policy. Through an independent third party, Republic Services provides an anonymous and confidential Aware Line. This hotline receives reports through a toll-free number and website, 24 hours a day, 7 days a week. Any concerns are addressed using a robust internal process whereby we investigate, respond and take appropriate corrective actions if warranted. We do not permit retaliation or intimidation against anyone who reports a concern, raises a compliance question, seeks advice or cooperates in an investigation. Anyone who retaliates or attempts to retaliate will be subject to disciplinary action, up to and including termination of employment. We are committed to monitoring human rights impacts, remedying any negative impacts we identify, and reporting them to relevant internal and external stakeholders, as appropriate. We update our policies and practices based on any improvement opportunities identified by this monitoring. Our Code of Business Ethics and Conduct, Supplier Code of Conduct, and Human Rights Policy each contain reporting instructions, as does our website and internal communications and posters.

## Measuring Effectiveness

We use multiple performance indicators to measure the effectiveness of our policies, due diligence, and training program. We regularly review our policies to ensure they are effective. We also review questions and feedback we receive to identify if our policies need to be clarified, simplified, or improved upon. We track and report on the number of cases reported and resolved through our investigation process. To date, we have not had any findings of forced or child labour.

## Supply Chains at Risk

Republic Services' supply chain is low risk for forced or child labour. Additionally, we have not identified nor been made aware of any instances of forced or child labour within our operations or supply chain in the reporting period. We are committed to continuously monitoring and mitigating these risks through our due diligence processes.

## Measures Taken to Remediate Forced and Child Labour

To date, we have not received any reports of forced or child labour requirement remediation. However, our policy includes procedures for addressing such issues promptly, ensuring appropriate corrective actions are taken.

## Approval and Attestation

Republic Services is dedicated to upholding human rights and ensuring that forced and child labour are not present in our operations or supply chains. We remain committed to continuous improvement and compliance with all applicable laws and regulations.

This report has been reviewed and approved by the governing body of Republic Services in accordance with the reporting obligations outlined in section 11(4)(b)(ii) of the Act. I attest that, to the best of my knowledge and after exercising reasonable diligence, the information provided herein is accurate and complete.

*Elyse M. Carlsen*

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**Elyse Carlsen, Director**