



Third Party Code of Business Conduct (“Third Party Code”)

As a third party working on behalf of Recology Inc. and its subsidiary companies (collectively “Recology”), you are expected to act in a manner consistent with our culture, mission, vision, and guiding principles. This Third Party Code of Business Conduct (“Third Party Code”) sets forth the ethical requirements that apply to anyone who conducts business on behalf of Recology, including agents, lobbyists, and consultants.

Your compliance with this Third Party Code is required and subject to periodic review and audit. Violations may result in corrective action including termination of your relationship with Recology. If you have any questions about this Third Party Code or its interpretation, please contact Recology’s Compliance Department at compliance@recology.com.

Anti-Bribery and Anti-Corruption

Recology is committed to abiding by the highest standards of ethical conduct. Third party partners are expected to transact the business of Recology lawfully and ethically.

Business decisions influenced by questionable or illegal payments are adverse to the best interests of Recology. Third party partners shall not give or loan any money or other thing of value to any public or private official as an incentive or reward for entering a business relationship, to influence any official act, or to induce the official or employee to violate their lawful duty. This prohibition includes bribery payments, kickbacks, facilitation payments, and any other payment or activity that might be construed as a reward for favorable treatment.

Antitrust and Fair Competition

Recology requires all our third party partners to conduct the business of Recology in full compliance with applicable competition laws, also known as antitrust laws.

Gifts and Entertainment

In dealing with public officials or public employees on behalf of Recology, third party partners are prohibited from offering or receiving gifts, entertainment, or any other benefits that could influence, or appear to influence, any decision by the public official or public employee. When acting on behalf of Recology, third party partners shall not (a) solicit or accept any gift from any public official or public employee or (b) give any gift to a public official or public employee.

Political and Charitable Contributions

Recology requires political and charitable contributions made on its behalf to be made within a controlled framework that mitigates risk, complies with applicable laws and legal obligations, and reflects Recology’s mission and vision. Third party partners shall not contribute to any organization, candidate, committee, or ballot issue on Recology’s behalf, nor commit Recology to contribute, except as pre-approved in writing by Recology.

Additionally, third party partners should be aware that Recology prohibits Behested Payments, with limited exceptions approved by Recology on a case-by-case basis. Third party partners shall not make or offer to make any Behested Payments on Recology's behalf, except as pre-approved in writing by Recology.

"Behested Payment" means a payment (monetary or in-kind) made to any person (including a charity or other third party) at the behest of a public official, government employee, or government agency, if it is requested, solicited, or suggested, directly or indirectly, by that person or agency, or otherwise made in cooperation, consultation, coordination with, or with the consent of, that person or agency.

Conflicts of Interest

Third party partners are prohibited from allowing their personal interests to interfere with their ability to make sound, objective business decisions on behalf of Recology. Even the appearance of a conflict should be avoided. By signing this Third Party Code, the undersigned third party certifies they have no conflicts of interest -- perceived or actual -- including loyalties or obligations to other parties that would impede their ability to carry out their contracted duties.

Reporting Potential Misconduct

It is your responsibility to ensure that you, and your employees, agents, and subcontractors understand and comply with this Third Party Code in working on Recology business.

If you become aware of any activity or potential activity that could violate this Third Party Code, including any allegation of fraud, theft, illegal activity, or unethical behavior involving Recology, you are required to promptly notify Recology. This may be done by emailing compliance@recology.com or contacting the EthicsPoint hotline at 866-295-2631 or www.ethicspoint.com. EthicsPoint allows the reporter to remain anonymous.

Receipt of Code

By signing below, the undersigned certifies that it has received Recology's Third Party Code, has read and understands the Third Party Code, understands that any questions about the Third Party Code or its interpretation should be directed to Recology's Compliance Department; and understands that failure to adhere to this Third Party Code could result in termination of the undersigned's relationship with Recology.

[Business Partner] Signature

Date

[Business Partner] Name (Printed)

Company Name