

Code of Conduct



**Don't Hesitate
to Escalate**



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As an employee-owned company, our culture at Recology is unique.

The viewpoint comes from the employee who owns a stake rather than a corporate mindset. From that vantage, the employee-owner spirit is galvanized and prideful in the service we provide to our customers and communities.

As we continue to grow as a company, we revise our internal practices to empower our workforce with knowledge and guidance. Our Code of Conduct reflects our values and expectations, and it shares our policies and internal controls to keep us moving forward ethically and productively.

Acting with the highest ethical standards is how we must do business as employee-owners. Ethical decisions and sound judgment are fundamental to every interaction we have with our customers, communities, and each other.

Along with the policies, we're enhancing our feedback channels to help our employee-owners provide their ideas in methods most comfortable. We strive for a culture that encourages transparency from leaders and employee-owners, where trust and ownership go hand in hand.

I am excited to lead this transformative chapter of Recology's story and continue our journey toward a world without waste.

Salvatore "Sal" Coniglio
Recology Chief Executive Officer





Introduction



**We are committed
to conducting
business ethically.**

**Achieving results through illegal
or unethical means is unacceptable.
We would rather lose business
than gain it improperly.**

This Code of Conduct (the “Code”) explains the company’s expectations for doing business ethically and in a manner consistent with our values, our policies, and the law. At the core of the Code is the unique Recology company culture that shapes the way we conduct business, treat each other with care and respect, and build trust with our communities, regulators, and customers.

While we have tried to provide guidance on ethical decision making that will apply in most circumstances, we cannot predict and address every situation that you may encounter. As such, it is important that you understand not only the words, but the intent behind the words in the Code.

If you are ever unsure of what to do in a specific situation, ask.

Ethical Decision Making

TO DETERMINE THE ETHICAL COURSE OF ACTION, ASK:

- Is it consistent with the law and Recology's policies?
- Does it reflect well on Recology's mission and values?
- Does it look appropriate to the public?
- Would it be approved by your manager and coworkers?
- Would it make you feel proud if you handled the situation this way?



NO, DO NOT PROCEED



UNSURE

- Speak up and reach out for guidance
- Consult the Guiding Principles on page 10



YES, PLEASE PROCEED!



It takes all of us.

Our Code applies to every person working with, for, or on behalf of Recology Inc. and its subsidiary companies, including agents, consultants, and lobbyists.

Recology believes acting in an ethical way is the right thing to do, and also fosters a sustainable business—one where employees, businesses, and communities trust each other and are invested in our shared success.

Managers and executives must lead by example and every employee-owner must both act ethically and be proactive in raising and identifying ethical concerns.

If you ever have questions about a section of this Code, a company policy, a law, or a regulation, please contact People & Culture, the legal department, or email compliance@recology.com.





Community Trust and Corporate Citizenship

Environmental Sustainability



Commitment to Communities



Employee-Owned Culture



Environmental Sustainability

The Recology mission represents a fundamental shift from traditional waste management to resource recovery.

We seek to eliminate waste by developing and discovering sustainable resource recovery practices that can be implemented globally.

At Recology, we prioritize resource recovery while also ensuring we minimize the environmental impacts of our operations.

Through advanced material processing technologies, forward-thinking recovery programs, and the ongoing adoption—and production—of renewable energy, we are actively recovering more resources, mitigating company emissions, and enhancing our operating efficiency.

We remain steadfast in our commitment to protect our natural environment and bring our waste zero vision into reality.



Each year, the recycling and composting activities of Recology and our partners avoid **more than 1.5 million MTCO₂e** of greenhouse gases.



Did you know that each year Recology diverts **more than 700,000 tons** of organic materials from landfills?

85% of the Recology fleet is powered by **renewable or alternative fuels**



Commitment to Communities

For more than 100 years, Recology has been committed to the communities we serve. Giving back to our communities and educating our customers on sustainable practices are central to our company culture and corporate citizenship.



VOLUNTEER PROGRAMS

Through our volunteer program and partnerships with community organizations such as Habitat for Humanity, we donate our time, recovered resources, and expertise to community projects to beautify and restore community centers, retirement homes, parks, and other public spaces.

WASTE ZERO EDUCATION AND OUTREACH

Recology empowers its partner communities by providing public education, funding, and materials that promote resource recovery and waste reduction.

Projects like the Artists in Residence programs in San Francisco and King County and GLEAN in Portland serve as both a source of environmental sustainability and public inspiration.



Employee-Owned Culture

As the largest 100% employee-owned company in the resource recovery industry, Recology has a unique workplace culture that guides how we support employees, interact with our customers, serve our communities, and care for the environment.

Our strong culture of employee ownership is built on our Guiding Principles:

- **Aware:** Know yourself and others
- **Approachable:** Connect with others
- **Accountable:** Own your actions
- **Agile:** Be a change agent
- **All Inclusive:** It takes all of us

These Guiding Principles are the keystones of our workplace culture.



GUIDING PRINCIPLES

APPROACHABLE

Active listening, empathy, and a willingness to connect are essential elements for strong and sustainable relationships. Adopt positive intent when you approach and communicate with others.

AWARE

Awareness starts with knowing yourself, and reflecting on personal strengths and weaknesses. Being self-aware is essential to success, and leads to a more collaborative, productive and positive workplace.

ACCOUNTABLE

Accountability means having a sense of urgency to accomplish your goals, own your mistakes, escalate risks, and maintain safety and compliance. It includes holding each other accountable as we work toward success.

AGILE

Agility means having an appetite for change, and always looking forward. Be humble, resilient, and accept opportunities to grow and evolve.

ALL INCLUSIVE

At Recology, it takes all of us. Authenticity and respect are critical to our success. Let's celebrate our diversity and work together to achieve our goals.





**Speaking Up, Listening Up,
Following Up**

Recology is committed to a workplace where all employees feel comfortable asking questions and raising concerns—and one where questions are answered and concerns are taken seriously.

If you ever encounter improper or unethical behavior, even if unintentional, the first step is always to speak up and immediately report any concerns. Recology cannot address problems that we do not know about. We are all responsible for speaking up and following up whenever we see or hear about misconduct. **When you speak up, you will be heard.**

BE APPROACHABLE

Supervisors and managers are expected to create an environment that invites team members to speak honestly about any issues or ideas they might have.



What should I report?

If you ever see or hear something that violates this Code of Conduct, Recology policies, standards or procedures, or applicable laws or regulations—intentional or not—you should always report.

Examples Include

- Fraud
- Bribery or corruption
- Unethical conduct
- Falsification of company records (e.g., timesheets, expense reports)
- Failure to comply with accounting procedures or practices
- Conflicts of interest
- Inappropriate sharing of company data
- Acts or threats of violence
- Violating a law or permit
- Harassment and discrimination
- Retaliation
- And more

AS AN EMPLOYEE-OWNER

I will comply with all laws, regulations and policies that apply to my job. I will:

- Act with integrity.
- Conduct myself in an ethical manner.
- Speak up promptly about possible misconduct, safety issues, or any other concerns.
- Not threaten or commit any acts of retaliation.
- Know and comply with the Code and Company policies.
- Take ownership and engage with compliance and ethics.
- Take responsibility for protecting, strengthening, and sustaining the Company's culture and reputation.
- Follow the Guiding Principles.

AS A SUPERVISOR OR EXECUTIVE

I won't direct my employees to violate this Code, a law, a regulation, or a company policy or procedure. As a people leader, I will:

- Speak about the importance of ethics and compliance to my team regularly and with conviction.
- Ensure that my team complies with ethical policies and procedures.
- Encourage employees to raise issues.
- Listen to and follow up with employees who report misconduct.
- Not threaten or commit any acts of retaliation.
- Report any retaliation by other leaders that I observe or that comes to my attention.
- Model the Guiding Principles.

TALK TO YOUR SUPERVISOR

All levels of management have been empowered to have an open-door policy and welcome any employee's concerns.

Q: I reported my concern to my supervisor, and haven't heard anything since. What should I do?

A: Follow up on your concern by checking in with your supervisor or your supervisor's manager.

PEOPLE & CULTURE RESOURCES

Contact your local P&C Partner or email people&culture@recology.com

ETHICS POINT

Contact **866.295.2631** or recology.ethicspoint.com.
You can remain anonymous.

How do I report?

LEGAL AND COMPLIANCE DEPARTMENTS

Contact any member of the Compliance Team at compliance@recology.com or the Legal Department.

Q: If I call the Ethics & Compliance Hotline or submit a report on EthicsPoint, will my report be anonymous?

A: Yes, if you would like to remain anonymous, you can, but an investigation into your concern could be difficult if we are not able to discuss it with you. In all instances, even where we know identifying information about the reporter, we will try to keep information about investigations confidential to the extent possible.

Zero Retaliation

Recology has a zero-tolerance policy that prohibits retaliation or threats of retaliation against anyone who reports a good faith concern or suspected violation of this Code.

You should always feel comfortable speaking up, and doing so will never have negative consequences when done in good faith.

Any and all incidents or threats of retaliation will be treated with sensitivity and seriousness. Recology treats all reports with the same degree of confidentiality and protection as the situation permits and is consistent with the law.

If you think or know that retaliation or a threat of retaliation has occurred, report it immediately.

Making a claim in “good faith” means having an honest and sincere belief that improper or unethical behavior may have occurred.

WHAT IS RETALIATION?

Retaliation is when an employee faces adverse action by management or another employee in response to their raising of a concern (ethical or otherwise). Examples include:

- Demotion, failure to promote, or termination
- Failure to give fair performance evaluations
- Negatively changing an employee’s working conditions
- Harassment or intimidation
- Creating a hostile work environment

Follow-Up

**If you speak up, or seek guidance,
we will listen and follow up.**

Issues raised will be handled by the appropriate personnel, whether it be the Legal or Compliance Departments, People & Culture, or management.

Should an investigation be necessary, we may reach out to you for additional information. We will keep the matter confidential to the extent possible, taking into account Recology's need to follow up and investigate the issue.

If you feel that your concern has not been taken seriously, consider escalating the issue to the next level of management, or reporting it via an alternate avenue, such as the Ethics & Compliance Hotline.



If the Company determines that misconduct has occurred, we will take appropriate disciplinary and preventive action, up to and including termination.

In the event of criminal or other serious violations of law, the Company may also notify the appropriate government authorities.

Nothing in this Code prohibits an employee from reporting, filing a complaint, or providing information to any federal, state, or local agency charged with the enforcement of any laws.



Conducting Business Ethically

Conducting Business Fairly

Recology prides itself on doing business fairly, honestly, and within the law.

Fair competition laws, known as “antitrust” laws in the United States, foster fair and honest competition in the marketplace. These laws prohibit competitors from working together to limit competition, monopolize markets, or control prices.

Employees must also be careful when interacting with competitors. One way of preserving fair and honest competition involves the proper collection and use of competitive intelligence. Gathering competitive information and business data is an appropriate business practice, but it must be done legally and ethically. It is never acceptable to engage in fraud, misrepresentation, trespassing, or other illegal or unethical methods to obtain competitive intelligence.

We do not make false or misleading statements about our competitors. We follow all applicable competition and antitrust laws.



We do not enter into any agreements (verbal or written) with other companies or individuals to:

- Rig bids
- Fix prices
- Allocate certain markets
- Prevent other companies from entering the market
- Boycott certain suppliers or third parties

In doing business, we can find out information regarding our competitors in an ethical manner, including, but not limited to, public filings, the media, their company publications, trade shows, and industry conferences.

Conflicts of Interest

We must all make our business decisions based on what is best for Recology, not for ourselves.

Conflicts of interest can exist when your private interests, including personal, family, social, or financial interests, interfere in any way with the objective performance of your job duties at Recology.

If you think you have or could have a conflict of interest, speak up and let your supervisor, People & Culture, or the Legal or Compliance Departments know right away so that we can help you and resolve the conflict.

Many potential conflicts can be resolved, but we need to know about them to properly resolve them.

GIFTS AND BUSINESS ENTERTAINMENT

Exchanging gifts or entertainment is often a common way of saying thanks and building goodwill between business colleagues. However, there are limits to what is considered an appropriate gift or entertainment.

Gifts must never be used to influence or appear to influence a business decision. Recology obtains its business only on the quality and merit of our products and services.

Recology employees are prohibited from giving or receiving any gift, entertainment, meal, loan, or anything of value to any public official or employee.

Conflicts of interest arise if it looks like we are attempting to improperly influence a business decision.

Accepting or giving gifts of nominal value (up to \$100 per calendar year) to any non-government Recology customer, supplier, or competitor that is consistent with normal business practices is permissible.

Q: I am a driver for Recology, and I was given a \$20 tip from a customer during the holidays. May I accept it?

A: You may accept unsolicited cash tips as long as they are under \$100 and are not prohibited under your company's contract with the local jurisdiction or other local rules. Tips may not be accepted as payments for extra services or pick-ups.

Q: I work as a scale attendant, and one of our regular customers wants to give me tickets to an upcoming Warriors game. May I accept the tickets?

A: No. Employees who serve in customer-facing roles at any landfill, transfer station, buyback, material recovery facility, or compost facility cannot accept any gifts, regardless of value.

Q: I work on rate-setting, and in my role, I often work with state government officials. One official, in particular, is very nice and easy to work with. May I send her a gift basket around the holidays?

A: No. This is considered a gift to a government official and could create the impression that the gift is in exchange for giving Recology favorable treatment.

What is a gift?



Tickets

to a sporting event or concert



Free Services

including free collection services, free parking, or free entry



Meals

including fruit and other types of baskets, bottles of wine, liquor, or refreshments



Discounts

not available to everyone



Gift Cards

are considered equivalent to cash

This list is not exhaustive. If any customer, supplier, or other third party offers you anything of value, it is considered a gift under Recology policy. Please refer to the **Gifts and Entertainment to Public Officials and Employees Policy**, the **Conflicts of Interest Policy**, **Anti-Bribery and Anti-Corruption Policy**, and the **Employee Reference Guide**.

OTHER EMPLOYMENT

Recology does not prohibit employee-owners from having another job. However, if you are employed by another company or have your own business, this can interfere with your ability to properly perform your job at Recology. For example, if you have another job whose schedule or duties interfere with your schedule or duties at Recology, that is a conflict of interest.

If you have outside employment that is in any way related to your current job duties or could create an actual or perceived conflict of interest, then you must discuss this with your People & Culture partner immediately. You are prohibited from using Recology resources for your other employment or your business. Under no circumstances can Recology employee owners work for our competitors.

Q: I work a second job as a tutor on weekends and evenings. Is this a conflict of interest?

A: No. As long as your tutoring job does not affect your work with Recology it is not a conflict of interest. However, your tutoring schedule cannot interfere with your Recology schedule and you cannot use your time at Recology to manage your second job's responsibilities.

POSITIONS FOR FAMILY MEMBERS OR CLOSE FRIENDS

All Recology employee-owners are prohibited from promising, offering, or giving jobs, internships, or other professional opportunities to their relatives or friends. Employee-owner relatives, romantic partners, and those who reside in the same household are eligible for employment with Recology. When an employee-owner is aware that a relative, romantic partner,

or member of the same household may become employed by Recology, the employee-owner should inform their management and Compliance.

Family members are prohibited from reporting directly to each other. In other cases where a conflict or the potential for conflict arises, even if there is no managerial relationship involved, the parties may be separated by reassignment or terminated from employment.

Q: My mother works as a consultant for a business partner of Recology. Is this a conflict of interest?

A: Maybe. A conflict of interest could arise if your mother could gain a benefit in her role as a consultant with our partners from your role at Recology. To manage this conflict, let your supervisor or manager know of the situation. Refrain from discussing business information with anyone outside of Recology.

OWNING COMPETITOR STOCK

Recology employee-owners and their immediate families are discouraged from owning stock in companies that are in direct competition with Recology.

CONDUCTING BUSINESS WITHOUT CONFLICTS OF INTEREST

Recology employee-owners, and their immediate families, may not engage in business transactions with Recology. This includes buying or selling goods and services or personal financial transactions such as loans.



Anti-Bribery and Anti-Corruption

Recology has zero tolerance for any form of bribery or corruption. We would rather lose business than gain it improperly.

Recology is committed to doing business based on analysis of quality, price, and mutual benefit. Business decisions influenced by questionable or illegal payments go against the best interests of Recology and are strictly prohibited.

Bribery can have very serious consequences for the individuals involved and for Recology. The cost and damaging ramifications of bribery and corruption can be significant and long-lasting.

Any employee who engages in this type of conduct will be subject to discipline, up to and including termination of employment, and may face criminal prosecution. Recology's priority is acting with integrity and operating only in an ethical manner. Refer to the [Anti-Bribery and Anti-Corruption Policy](#) for more information.

BRIBERY

Recology prohibits bribery of any kind. It is strictly prohibited to solicit, demand, accept, or pay anything of value to gain improper influence or advantage—whether it involves a government official or not.

This applies to business in and outside of the United States. Recology complies with all applicable laws and regulations, including the Foreign Corrupt Practices Act, which prohibits offering or promising anything of value to foreign government officials.

A bribe is an offering, solicitation, demand, promise, or payment of anything of value with the intent to improperly influence a business decision. Even if a bribe is not paid, just offering a bribe can be illegal and is prohibited.

“Anything of value” includes:

- Cash or cash equivalents (e.g., gift cards)
- Gifts
- Free Recology services or products
- Travel expenses, meals, or entertainment
- Charitable contributions
- Offering a job

FACILITATION PAYMENTS

Also known as “grease payments” or “cost of doing business,” facilitation payments are usually small payments made to any public officials, public employees, or representatives of private businesses to speed up or move a process along.

Recology does not make such payments. All facilitation payments are expressly prohibited, even where they are not illegal.

A “public official” is any person acting in an official capacity on behalf of any government, agency, department, regulatory authority, or instrumentality.

The term is defined loosely and also includes national, state, or local government employees, candidates for political office, political party officials, employees of government-owned enterprises, and employees/representatives of quasi-public or international, non-government organizations, such as the United Nations and the Red Cross.

KICKBACKS

A kickback is the payment of anything of value as a reward for fostering a business arrangement. Accepting or offering a kickback violates this Code.

If you are ever approached by anyone asking for a bribe or some other exchange of favors for business purposes, **you must speak up and report it to the Legal or Compliance Departments immediately.**

If you ever witness or hear about a Recology employee offering, or paying, a bribe to anyone, speak up and report it. **No employee will ever suffer adverse consequences for refusing to pay a bribe, even if it results in a loss of business.**

Q: A customer gave me a bottle of wine and asked if I could make their pickup a little earlier next time.

A: This is considered a “kickback” because the customer expects faster service in return for the gift they gave you. This is not allowed under any circumstances.

Q: We are in the process of evaluating suppliers for office furniture. The vendor’s sales team sent us free tickets to an exclusive sporting event while they wait on our decision.

A: This could be considered a bribe. The supplier’s sales team may be seeking to influence your team during the decision-making process to view them favorably. You cannot accept this gift.

Q: We need to get our service teams out to a remote location, and it has been difficult. A local official said that if we contribute \$2000 to his favorite charity, he can help “get these little obstacles out of the way.” Should we pay it?

A: No. Even though it is not a direct payment to a government official, it can still be considered a bribe and is prohibited. Similarly, behested payments by government officials who have influence or control over Recology rates or contracts are strictly prohibited. *See page 26 for definition of behested payment*

Interacting with Government Officials

Federal, state, and local governments each have certain unique restrictions that govern relationships with contractors, such as Recology. To the extent a jurisdiction has more stringent standards than Recology, employees in the jurisdiction should follow the more stringent standards. To the extent a jurisdiction has less stringent standards, then employees should follow the more stringent standards set forth in Recology's policies.

For more information, refer to the [Employee Reference Guide](#), [Charitable Contributions and Sponsorship Policy](#), [Political Contribution Policy](#), and [Gifts and Entertainment to Public Officials and Employees Policy](#).



GOVERNMENT CONTACTS ARE INTEGRAL TO OUR BUSINESS

At Recology, when we think about servicing our customers, our commercial and residential customers often come immediately to mind—but the governments of the cities and towns that Recology services are our customers as well.

Recology contracts directly with various municipalities, our contracts may be governed by municipal codes, and our rates may be reviewed and set by government regulatory agencies.

We must ensure that all interactions on behalf of Recology, including written, verbal, or in-person interactions are above-board, business-related, and conducted via company email, phones, or mobile devices.

Whenever you engage in communication with any regulatory agency or government agency outside of the regular course of business or outside the rate-setting process, you must seek guidance from the Legal or Compliance Departments and follow all Recology's policies and procedures.

Under no circumstances should you engage in separate business dealings, including charity donations, with any government official on behalf of Recology without first seeking guidance from the Legal or Compliance Departments and/or senior management.

POLITICAL DONATIONS/ACTIVITIES

We encourage you to engage in the political process as much as you are willing and able to do so. However, it must be clear that any political contributions you make are as an individual and that the contributions are made on your own behalf,

using your own time and funds. You should refrain from using any Recology-branded clothing or items while participating in any political process.

It is prohibited to make any political contributions on behalf of Recology unless reviewed and approved by the Legal or Compliance Departments and Government Affairs.

If you wish to run for a political office, seek guidance from the Legal or Compliance Departments to determine whether it could be a potential conflict of interest.

Q: I often chat with the administrative assistant at the county's utilities division. Is it okay for me to send him a gift basket for his kindness throughout the year?

A: No. The administrative assistant works for the county and is considered a government official and any gift to him would be considered a gift. Additionally, this could create an impression that you are sending him the gift in exchange for favorable treatment.

Q: I am a big supporter of Candidate Y for County Controller. Can I donate to her campaign and volunteer to help with outreach to voters?

A: We encourage you to participate in the democratic process, and donations from you to Candidate Y are your business. However, you may not use Recology resources or wear Recology-branded clothing during your campaign work. You must also refrain from doing voter outreach while at work, including to your coworkers.

GIFTS/DONATIONS TO PUBLIC ENTITIES

You may be asked for a contribution from Recology to a public entity—for example, to donate company trucks or equipment to a town clean-up event. In instances like these, reach out to the Compliance Department for guidance. All charitable contributions and sponsorships are processed through [CyberGrants](#). Gifts/donations made to or at the request of public officials or employees are generally prohibited with exceptions granted upon review.

Donations, whether in-kind or monetary, are carefully reviewed by our Compliance Department to ensure that they are appropriate, transparent, and do not violate any policies, procedures, laws, or regulations.

Recology policy prohibits “behested payments” by any government official or employee. Compliance may approve exceptions in limited circumstances.

Behested Payment: a payment (monetary or in-kind) made at the request 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.

A Behested Payment does not include any services that Recology is specifically obligated to provide pursuant to a written contractual obligation.

JOBS OR INTERNSHIPS FOR RELATIVES OR CLOSE FRIENDS OF PUBLIC OFFICIALS

Recology prohibits the employment of public officials/employees, their relatives, and anyone who is in a government position to oversee or influence Recology’s business or approve Recology’s contracts. Any exception to this must be approved by the Chief People & Culture Officer and the Director of Compliance or General Counsel.

If you are a manager or supervisor or are otherwise in a position to make hiring decisions, you must seek guidance from People & Culture, and the Legal and Compliance Departments before offering to give, or giving jobs, internships, or any other professional opportunities to friends or relatives of public officials.

Violating any corruption law or related Company policy can result in serious consequences for those involved and the Company, including:

- Damage to company reputation
- Employee termination
- Fines and penalties
- Lawsuits
- Jail time



**Treating Others
with Integrity and Care**

Maintaining Confidentiality

Recology treats the confidential information of our customers, Company, and business partners with great care. When handling confidential information, it is important that you always use discretion to prevent unauthorized disclosure.

Confidential Information refers to information related to Recology's business that Recology has not made public or authorized to be made public. **Examples include:**

- Financial records
- Business, marketing, and strategic plans
- Employee records (e.g., health or benefits-related information)
- Payroll and timecard records
- Customer account information
- Trade secrets
- Techniques and procedures

It is our shared duty to keep the confidential information about Recology, our customers, business partners, and other third parties private and confidential.



Employees and agents handling customer data should be aware of applicable data privacy laws and regulations. Recology's collection of personally identifiable information may be subject to data privacy laws such as the California Consumer Privacy Act.

Confidential information should be stored in authorized protected and access restricted locations and only disclosed if properly authorized and approved. The duty to protect confidential information continues even after an employee or agent has ended their relationship with Recology. If you are in a situation where you think that confidential information must be shared—contact the Legal or Compliance Departments for their review and authorization to share the information.

The duty to protect confidential information continues even after an employee or agent has ended their relationship with Recology.

Recology employees or agents are prohibited from recording or photographing and sharing.

You are not prohibited from discussing or disclosing your own pay or the pay of another employee or applicant except as set forth in our [Pay Transparency Nondiscrimination Policy](#).

No one will be retaliated against for disclosing confidential information when raising questions or concerns to federal, state, or local government officials, or attorneys, made solely for the purpose of reporting or investigating a suspected violation of law.

Refer to the [Employee Reference Guide](#) or contact the Legal or Compliance Departments for questions or more information.

THIRD-PARTY CONFIDENTIAL INFORMATION

Third-party confidential information you may come into contact includes:

- Applicant information
- Customer information
(e.g., email, phone numbers, addresses)
- Supplier confidential information,
including pricing

You must keep information confidential and never use third-party information for your own benefit or purposes.

Maintaining Accurate Business Records

Keeping accurate records is crucial to stay on top of the state of the Company and in making decisions about the future.

The responsibility to keep complete and accurate records falls on all of us—always follow Recology policies and procedures regarding accurate record keeping.

You have a responsibility to help create an environment in which accurate financial reporting is the expectation.

When making entries into Recology's books, be sure that they are always consistent with the U.S. Generally Accepted Accounting Principles ("US GAAP"), as well as corporate, and local accounting policies. Never engage in any arrangement that involves making artificial or inaccurate entries into Recology's books or records. Funds shall only be disbursed for the purposes described in the documents supporting a payment or transaction.

If you have any knowledge of an unrecorded asset, obligation, income, expense, or other inaccuracy in Recology's books and records, you must immediately report the information to the President & Chief Financial Officer.

When metrics become goals, rather than just measurements, there may be the temptation to falsify results.

Accurate assessments of an organization's operations are essential in driving effectiveness and efficiency. Conversely, the falsification of operational metrics makes it impossible to determine an organization's actual health.

Falsely reporting operational metrics might improve the appearance of the group's performance, but over time, makes it impossible to measure or predict work performance and outcomes.

To obtain real insights into work performance, leaders must explicitly encourage accurate record keeping, regardless of the optics.

For more information on our duty to keep accurate business records, please refer to the [Employee Reference Guide](#).

Diversity and Non-Discrimination

Recology is an equal opportunity employer. We value diversity and inclusion within our workforce. We do not tolerate discrimination of any kind. All employment and promotional decisions are made on merit, and all employees will be given equal opportunities for training, jobs, and promotions.

We do not discriminate based on any non-job-related factor including, but not limited to, race, national origin, sex, sexual orientation, gender, gender identity, transgender status, religion, age, medical condition, or any other status protected by local, state, or federal law.

Additionally, we will not discriminate against an individual because that person holds or presents a state driver's license issued to those who cannot document their lawful presence in the United States. An employee's or job applicant's immigration status will never be considered for any employment purpose except as necessary to comply with federal, state, or local law.

Our commitment to equal opportunity employment applies to all persons involved in our operations and prohibits unlawful discrimination and harassment by any employee, including supervisors and coworkers.

BE ALL INCLUSIVE

At Recology, it takes all of us. Authenticity and respect are critical to our success. Let's celebrate our diversity and work together to achieve our goals.



Recology will not tolerate discrimination or harassment based upon these protected characteristics or any other characteristic protected by applicable federal, state, or local law. Recology also does not retaliate or otherwise discriminate against applicants or employees who request a reasonable accommodation for reasons related to a legally protected class.

Refer to the [**Employee Reference Guide**](#) for more information.

All Harassment is Prohibited

Recology prohibits all forms of harassment.

Recology considers offensive jokes (e.g., racial, insensitive, sexist), demeaning comments, graphic material, stereotypes, or slurs of any kind to be harassing behavior and thus unacceptable. If you see or experience harassment, it is your duty to report it.

Examples include:

- Hazing
- Bullying
- Behavior that unfairly targets another employee
- Creating an intimidating or hostile work environment
- Causing interference with another employee's ability to do their job
- Sexual harassment
- Hostile or offensive behavior or verbal, written, or electronic (e.g., email, instant messenger) that unfairly targets or singles out another employee

Employees that engage in harassment of any kind will be subject to discipline, up to and including termination.

Refer to the [Employee Reference Guide](#) for more information.

Q: My manager often makes offensive jokes about my nationality. When I told her it offended me, she said she was “just joking,” but she keeps doing it. What should I do?

A: You have already done the right thing by speaking up. Your supervisor should not be making these jokes, and jokes about anyone's nationality or ethnicity are never acceptable. Speak up to another manager, People & Culture, Legal or Compliance, or make a report via the Ethics & Compliance Hotline.

Q: My colleague asked me out on a date. I said no, but now he continues to ask me out and regularly interrupts my work, and bothers me during my breaks. What can I do?

A: Speak up by reporting this behavior to your manager, People & Culture, Legal or Compliance, or through the Ethics & Compliance Hotline. You should not have to put up with any type of harassment at work, and we will follow up.

Health and Safety of Employees

SAFETY FROM VIOLENCE

Recology is committed to a workplace free from violence. Violence—including any behavior that could lead to violence—will not be tolerated at Recology. **Prohibited acts include:**

- Threatening violence
- Intimidating others (e.g., acts of hazing or “teasing”)
- Damaging or destroying property
- Physically touching or hurting someone
- Vandalism
- Using derogatory epithets

Refrain from any violent or violent-adjacent behavior at all times. **Employees who engage in these acts will be disciplined, up to and including termination.**

If you experience violence at work or witness someone else experiencing violence at work, it is your duty to speak up and report it. Some acts of violence may require calling 911 or local law enforcement authorities.

Don’t hesitate to escalate! All incidents of violence and threats of violence that are reported will be taken seriously and investigated. The Company’s goal is to handle all situations with utmost sensitivity, while meeting the goal of workplace safety and security. No Recology employee will be subject to retaliation for filing a report in good faith.

WEAPONS ARE PROHIBITED

All weapons are prohibited at any Recology facility, vehicle, or job site with some minor exceptions (pepper spray for self-defense in a canister less than two ounces is allowed).

Refer to the **Employee Reference Guide** for guidelines about the signs of violence and steps to take to prevent it.

SAFETY FROM DRUGS AND ALCOHOL

Recology maintains a drug and alcohol-free workplace.

All employees and agents are expected not to work under the influence of drugs or alcohol—as doing so may inhibit your ability to perform your duties safely and responsibly.

The Federal Motor Carrier Safety Administration also requires Recology to implement a controlled substance and alcohol use testing program for employees who drive or who must be available to drive commercial motor vehicles. In addition, employees subject to Department of Transportation regulations on drug and alcohol use must comply with the Substance Abuse Policy.

In circumstances where employees and agents are in violation of the Substance Abuse Policy, Recology will administer discipline or penalties.

Additional rules are imposed on employees who perform designated “safety sensitive” job functions. These policies, as well as the additional prohibitions, are based on employee job classification. Each operating company has a local administrator who manages this program at each site and can answer questions regarding this policy. To find out the designated local administrator for your company, ask your manager. The **[Employee Reference Guide](#)** has more details on these policies.

Illegal conduct (e.g., illegal use, possession, sale, distribution, and cultivation or manufacture of drugs) is always prohibited, regardless of whether the employee is working or on Recology premises at the time.

If you are experiencing challenges with drugs or alcohol and would like help, please contact our People & Culture department so that we can guide you to help. Recology will attempt to reasonably accommodate employees with chemical dependencies (drugs or alcohol), if they voluntarily wish to seek treatment and/or rehabilitation, unless the accommodation imposes an undue hardship on the Company’s business operations.

Q: I think my supervisor, who also drives a company vehicle as part of his job, is drinking alcohol during work hours. Is there something I can do?

A: Speak up. Recology wants to make sure that all its employees are being safe and not putting anyone at risk, including themselves. You should talk to another manager or, if you are not comfortable with that, approach People & Culture or the Legal Department.

OPERATIONAL SAFETY

Recology does not compromise when it comes to the safety of our people, our customers, and the communities we serve.

We strive to attain the highest levels of safety in all our activities and follow all applicable health and safety laws.

It falls on all of us to ensure that our work areas are kept safe, secure, and free of hazardous conditions. Always be aware of proper operating methods and known hazards or dangerous conditions involved in your work.

If you ever find an unsafe condition or potential hazard, or become aware of safety precautions not being followed, speak up and report.

Similarly, if you suspect a concealed danger on Recology's premises or facilities, or with products, equipment, or business practices, speak up—we will arrange to correct the unsafe condition.

Make sure to follow all Recology Health and Safety rules and regulations, including the Illness Prevention Program manual.



Zero Accidents, Zero Injuries. The Recology Zero-Zero Club is a prestigious group of employee-owners who finish the year with zero accidents and zero injuries.

SPEAK UP REGARDING SAFETY WHEN YOU:

- Notice a dangerous or hazardous condition
- See someone performing a job in an unsafe manner or a job for which they are not properly trained
- Are asked to take a safety shortcut or not comply with a safety rule, regulation, or law
- Believe a company vehicle or equipment may be unsafe to operate
- Are asked to do a job that you consider to be unsafe or one for which you are not properly trained

Remember that if you are asked to take a safety shortcut by your manager, you must speak up and report it!

VI.

Conclusion

The entire Recology team—every employee—owner, manager, and senior executive—is responsible for following the guidelines in our Code of Conduct.

We must ensure compliance with both the letter and the spirit of this Code.

Sometimes it may not be clear how to act. In that case, we expect you to stop and ask questions.

Reach out to your manager, People & Culture, Legal, or Compliance when you need help. If you are a manager, we expect you to listen to and follow up on all issues that are raised. Together, we can continue to operate our business ethically while sustaining our communities and each other.

Remember, there are multiple avenues available for you to speak up. If you think you have encountered an actual or potential ethical concern or violation, or if you want to ask a question and seek guidance on the Code, reach out to:

- A supervisor or manager
- People & Culture
- Legal Department
- Compliance Department at compliance@recology.com
- Ethics & Compliance Hotline at **866.295.2631**
- Listening Sessions
- Share Your Voice Platform at **822.701.7326**

You can also raise a concern or seek guidance by submitting a report online at recology.ethicspoint.com. The Ethics & Compliance Hotline, recology.ethicspoint.com, and the Share Your Voice Platform include the option to remain anonymous.

Be assured that we will follow up on your concerns. The responsibility for building and sustaining an ethical business belongs to us all.

DISCLAIMER AND WAIVER

This Code of Conduct contains information regarding certain policies, procedures, and practices related to Recology Inc. and its subsidiaries.

The electronic version of this Code of Conduct on the Company's Intranet supersedes all prior versions of this Code of Conduct. The most up-to-date version of this Code of Conduct can be found online at recology.com/compliance.

There may be circumstances when an exception must be made to the provisions of this Code. In these limited instances, only the Board of Directors may waive a provision of this Code. The Company will promptly disclose any such waiver as required by law. In the event of a conflict between the provisions of the Code and provisions contained in other Company policies (including the Employee Reference Guide), the provisions and principles contained in the Code shall prevail. In the event of any such conflict, the General Counsel and/or the Director of Compliance is vested with the primary authority to interpret how this Code applies to a given situation in the first instance. Ultimate authority for the interpretation of the Code rests with Recology's Board of Directors.

This Code does not provide any rights, contractual or otherwise, to any third parties.

The provisions of the Code are subject to revision, supplement, change, or amendment at any time as determined appropriate by the Company and in accordance with applicable law.

We expect each employee to read this Code of Conduct carefully, as it is a valuable resource for understanding how you are expected to fulfill your job responsibilities.

This Code of Conduct is the property of Recology and all rights are reserved.

This Code of Conduct was last updated in May 2025.

RECOLOGY POLICIES INTRANET LINKS

[Anti-Bribery and Anti-Corruption Policy \("ABAC"\)](#)

[Charitable Contributions and Sponsorship Policy](#)

[Conflicts of Interest Policy \("COI"\)](#)

[Employee Business Expense and Per Diem Policy](#)

[Employee Reference Guide \("ERG"\)](#)

[Gifts and Entertainment to Public Officials and Public Employees Policy \("No Gift" Policy\)](#)

[Political Contributions Policy](#)

[Risk Escalation Policy](#)