



Sustainable
Waste Solutions

Code of Business Conduct



Contents

OUR VALUES	3
Ensuring a Safe and Inclusive Workplace	3
Delivering Results through Trust	3
Building Breakthrough Capabilities.	3
HOW WE OPERATE	4
Safety Comes First	4
Environmental Responsibility	5
Workplace Diversity and Inclusion	5
Market Competition	6
HOW WE DEAL WITH THIRD PARTIES	8
Government Officials.	8
Entertaining and Gifts	8
Public Sector Customers.	8
Bribery and “Kickbacks”	9
Private Sector Customers, Suppliers or Others.	9
Receiving Gifts and Entertainment	10
Finder’s and Agent’s Fees	11
Political Contributions and Lobbying Activities	11
Inquiries from Government Agencies, Reporters and Others.	11
International Business	12
OUR WORKPLACE RESPONSIBILITIES	13
Respect	13
Discrimination and Harassment	13
Use and Protection of Reworld™ Assets; Information.	13
Electronic Communication and Social Media Policies	14
Outside Employment	14
Conflicts of Interest	14
Related-Party Transactions.	14
Substance Abuse	15
Violence-Free Workplace	15
Copyright Policy	16
Records Retention.	16
WE WANT TO HEAR FROM YOU	17
ANNUAL CERTIFICATION	17

At Reworld™, a key component to ensuring a positive and productive workplace culture is forming concrete, core values that help us to align our actions with our vision. These values serve as a guide for decision-making and behavior as well as provide a clear direction for the organization.

Ensuring a Safe and Inclusive Workplace

Safety, inclusion, and integrity remain at the forefront of our values:

- **Safety:** We protect employee safety and health as our priority at all times
- **DE&I:** We value and respect our diverse employee base knowing that our differences make us stronger and more competitive
- **Integrity:** We say what we mean and mean what we say, taking a stand for what is right

Delivering Results through Trust

Teamwork is the key to achieving our goals, and we encourage our employees to work together to find innovative solutions to complex problems; trust and collaboration are the foundation:

- **Respect & Candor:** We treat each other with fairness and dignity; interacting in an open, straightforward manner, assuming positive intent
- **Accountability:** We hold ourselves and one another accountable to deliver on our commitments
- **Collaboration:** We break free of silos and boundaries to work together to deliver greater outcomes for the whole organization

Building Breakthrough Capabilities

Customers are at the heart of everything we do, and we are committed to delivering exceptional experiences by pushing the boundaries of what is possible and thinking outside of the box:

- **Customer Focus:** We build strong relationships with customers by exceeding expectations with the highest levels of service and commitment
- **Innovation:** We encourage our employees to take smart risks, experiment with new ideas, and challenge the status quo
- **Lean Mindset:** We embrace a culture of kaizen, collaboration, and waste reduction to create a more efficient and effective organization



Together, we have built a strong company that is well regarded around the country and the world. Our ability to continue to maintain our position in the markets in which we compete, and grow intelligently, rests squarely on the shoulders of our employees and how we conduct our business and ourselves. Every day, our actions, promises, ethics and attitudes reflect on Reworld™ as a whole and each of the other employees with whom we work.

Safety Comes First

At all times, we will strive to operate in a manner that protects employee safety and health. We will give primary consideration to safety for ourselves, our colleagues and the public, in everything we do. Our detailed safety and employee health policies are intended to go beyond the obvious obligations to comply with all applicable safety and health related laws and regulations governing our business.

We are committed to integrating core principles of safety and employee health into all business activities with the objective of eliminating illnesses and injuries and continuously improving performance. These core principles regarding safety and employee health are:

Nothing is more important than employee safety and health not production, not throughput, not profits.

Accidents, illnesses and injuries are preventable they are not inevitable.

Safety and health is a management responsibility and safety and health can be managed.

Safety and health is an individual responsibility and a condition of employment.

Safety and health is a way of life around the clock, both on and off the job.

Every task must be performed with a concern for safety and health for ourselves, our fellow employees, our contractors, our visitors, our customers and the communities in which we operate.



Environmental Responsibility

We offer sustainable solutions to environmental problems in the fields of energy and waste management, and our businesses are heavily regulated and scrutinized. We are committed to fostering an ethos of environmental responsibility that goes beyond compliance, and our environmental policies rest on the following core principles:

Protection: We will conduct our business in an environmentally sound manner that is protective of human health and the environment.

Compliance: We will manage our work to assure compliance with all applicable environmental regulations and requirements.

Conservation: We will minimize impact to the environment by encouraging pollution prevention at the source, waste minimization, recycling, and responsible disposal of production by-products.

Qualification: We will ensure that all employees have the necessary information, resources and training to make informed environmental decisions.

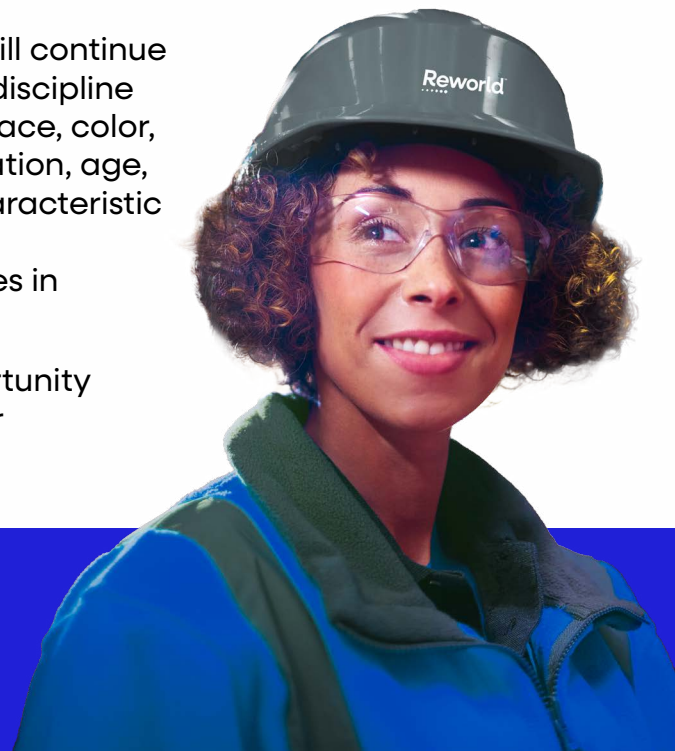
Commitment: Reworld™ is committed to be an industry leader in environmental protection by achieving superior awareness and performance through a process of continuous improvement.

Workplace Diversity and Inclusion

We value and respect a diverse employee base and strive to reflect the diversity of the communities we serve and those in which we live. We believe that valuing differences makes us stronger and more competitive.

We are an equal opportunity employer. We have and will continue to recruit, select, train, promote, compensate, transfer, discipline and take all other personnel actions without regard to race, color, religion, national origin, ancestry, gender, sexual orientation, age, disability, marital status, veteran status or any other characteristic protected by applicable law. We will make reasonable accommodations to qualified employees with disabilities in accordance with law.

For more information about our policies on Equal Opportunity Employment and other important policies related to our workplace, please consult our [Employee Manual](#).



Market Competition

We strongly encourage vigorous competition in all markets in which we operate. We have thrived in this atmosphere and intend to continue to engage in lawful and dynamic competition to our benefit and that of the economy as a whole. It is fundamental that we independently determine the pricing, terms, commissions, and other contractual terms offered to customers.

All of us who deal with third parties on commercial matters have legal responsibilities to ensure our activities and practices are consistent with the competition laws in the U.S. and abroad. For more information on these responsibilities, such employees should review our [Competition Policy](#).

We should never discuss with our competitors any of the following topics:

- Our costs or profits;
- Pricing practices or policies;
- Restricting or increasing levels of production;
- Coordinating bids;
- Customers, markets or territories; or
- Boycotts of suppliers or customers.

We should avoid requiring a customer to buy products exclusively from us unless the matter is discussed with our law department. We should also avoid offering customers prices more favorable than those offered to competing customers unless such action is justified by cost savings, the need to meet competition or a change in market conditions.

Joint Ventures

Because entry into a joint venture with a competitor can be construed as anti-competitive behavior triggering antitrust liability, all joint ventures with competitors should be discussed in advance with our General Counsel.

Trade Associations

Membership in a trade association, by its nature, involves meetings and discussions with competitors. Accordingly, we must take care to avoid antitrust problems. Anytime Reworld™ or any of us becomes a member of a trade association, the senior manager of the business unit involved must document and maintain the following information:

- The name of the trade association of which we are a member;
- A copy of all communications made to trade associations; and
- All requests for dues, payment and other contributions to trade associations.

We belong to trade associations only when such groups contribute significant benefits to justify the time and cost of membership or support. No one may become an officer in any trade association without first securing permission from our General Counsel.

Before attending a trade association meeting, everyone should be properly briefed as to our policy with regard to trade associations. Before answering trade association questionnaires asking for information relating to prices or other terms and conditions of sale or purchase, the questionnaire must be forwarded to our General Counsel for review. If anyone attends any trade association meeting where the subject of pricing, bidding, territorial or customer allocation or refusal to deal is mentioned in any form or manner, that person must leave the meeting immediately, without comment, but not before serving notice of the departure (be sure that the other attendees will remember the departure). A report of the circumstances must be provided to our General Counsel so that proper corrective action (which may include membership termination) can be taken.

For a more detailed discussion of our competition policies, please consult our [Competition Policy](#).



Government Officials

When dealing with federal, state, local or foreign officials, even the appearance of impropriety must be avoided. If you deal with such officials on a regular basis, you should obtain a copy of their governing ethics guide or rules and, if appropriate, any rules or regulations with respect to their procurement process. Failure to comply with their rules and regulations can result in public embarrassment and even loss of business.

Entertaining and Gifts

We follow ethical standards of behavior in our dealings with our customers, both in the public and private sector, and with our suppliers and service providers. There are specific rules that apply relating to entertainment and the giving of gifts.

Public Sector Customers

Before offering, promising or giving of anything of value to an employee, agent or official of a federal, state, local or foreign government, obtain the relevant agency's guidelines regarding gifts, entertainment, refreshments, transportation, lodging or meals in connection with a business meeting. Such guidelines may contain express exemptions which may allow a federal, state, or local government employee, agent or official to accept a gift which is below a certain dollar amount (individually and aggregating all other gifts in a given year) and thus considered nominal in value. It is essential that we comply with these rules.

It is important to recognize the difference between public and private sector.

The public sector includes federal, state, local and foreign officials. Public sector employees are almost always subject to their own **SPECIFIC RULES and REGULATIONS.**

The private sector includes all other parties and entities. Private sector employees may or may not be subject to specific rules but Reworld™ employees are!

Bribery and “Kickbacks”

There are federal, state, local and foreign laws (anti-corruption laws) that prohibit the offering, promising or giving of anything of value (a “bribe”) to an employee, agent or official of a federal, state, local or foreign government if the gift or gratuity is made with an intent to influence such individual in the performance of an official act, or because of an official act performed or to be performed by the public official. **“Kickbacks” are a form of bribery involving a supplier’s hidden agreement to return a portion of the money paid by a customer (the “kickback”) to the customer (or, more commonly, the customer’s decision-makers) in order to secure an award of business. Kickbacks are illegal in both public and private business.**

Anti-corruption laws are complex. It may be difficult to determine whether gifts are made for proper or improper purposes. More importantly, it can be difficult to avoid the appearance of impropriety while providing entertainment, meals or refreshments or gifts to these public servants. Therefore, it is our policy not to entertain or to provide meals, travel, lodging, or entertainment or to offer, promise or make any gift to any government employee, agent or official of any federal, state or local public authority or foreign government, unless they are customary and legal under applicable laws and regulations and the following conditions are met:

- **In the case of gifts,** they are not in the form of cash, cash equivalents or securities (of any type).
- **In the case of gifts,** they are either:
 - nominal in value (i.e. under \$50); or
 - if approved in advance by the head of your business unit or General Counsel, such greater amount that is appropriate and respectful given the local customs regarding such matters, and in any case consistent with the general restrictions in this policy regarding the nature of the gift itself and prohibitions against lavish or excessive gifts.
- **In the case of entertainment, meals, travel or lodging,** they are provided if solely and directly related to the purpose of addressing matters affecting our legitimate business interest, and only for individuals necessary for that purpose.
- **In all cases,** they are reported as required by applicable laws and regulations, and properly recorded in our books and records in accordance with accounting standards.
- It is important that the value of the entertainment, meals and beverages supplied to any individual, both in amount and frequency, not be considered lavish or excessive, or susceptible of being viewed in hindsight as improper or lacking in propriety. Please be aware that many governmental authorities prohibit all such expenditures for their legislators, officials and employees.

Private Sector Customers, Suppliers or Others

Gifts, kickbacks, or bribes for the purpose of influencing the business decisions of employees of customers or suppliers, whether they be public or private, are illegal under state and federal commercial bribery laws. Gifts or payments of this kind should never be made – or accepted -- under any circumstances.

We strongly discourage gifts made by or on behalf of Reworld™ in excess of \$100 per year to any individual, but in the event a gift is proposed to be made in excess of this amount, approval must be secured in advance from our General Counsel.

Gifts and entertainment should be reviewed in the context of the following criteria:

- Gifts in the form of cash, cash equivalents, or securities (of any type) are always unacceptable, under any circumstances.
- Gifts and entertainment must be in accordance with normally accepted business practices and applicable laws, and comply with the policies of the organization employing the recipient in addition to Reworld™'s policies.
- Subsequent public disclosure of all facts should be reflective of our high business standards and commitment to transparency.

The cost and nature of entertainment should be planned and carried out in a way which appropriately and reasonably furthers the conduct of our business. Employees of potential private sector customers may be transported to, shown, and served at our locations as part of the normal sales effort at our expense.

It is not our intent to eliminate gifts made in accordance with normally accepted business practices, such as holiday gifts, or to eliminate normal business entertainment, where we, in accordance with established practices, entertain at our expense employees of customers and individuals representing entities with which we have a business relationship.

Receiving Gifts and Entertainment

Gifts totaling more than \$100 from any supplier or customer, whether kept by the original recipient or passed along to any other person, should not be accepted in any company fiscal year, and any gifts exceeding this amount should normally be returned to the donor. The acceptance of anything of value (a bribe or kickback) in exchange for favorable business decisions is always prohibited.

If the circumstances would clearly appear to make the return of the gift detrimental to our interests, our General Counsel should be consulted for a decision on the proper course of action.

With respect to entertainment, the same criteria as noted above apply. Employees should never accept social invitations where the cost is lavish or extreme and may be viewed as intended to influence or interfere with business decisions. It is important to bear in mind that the receipt of gifts or entertainment will often be viewed in hindsight, and considered together with similar gifts and entertainment that may have been previously received. Therefore, all employees should consider whether, over time, gifts or entertainment received from a supplier or customer may create even the appearance of impropriety as a result of factors such as size or frequency, lavishness, or recipients.

Gifts in the form of cash, cash equivalents, or securities (of any type), whether given or received, are always unacceptable.

Finder's and Agent's Fees

Reworld™ only pays finder's and agent's fees for soliciting, securing or retaining business when prior written approval of our General Counsel has been obtained.

Political Contributions and Lobbying Activities

Political Contributions

Specific laws apply to political campaign contributions from corporations. Under federal law a corporation may not make political contributions to federal political candidates or campaign committees. The extent to which corporations are permitted to contribute to state political candidates or campaign committees varies from state to state. While, in general, employees are free to make a personal contribution to any political candidates or committees as an individual and not as a representative of Reworld™, they are subject to the individual limitations under state and federal laws. In addition, certain officers and directors of Reworld™ are subject to other state limits.

Reworld™ also has written procedures which must be followed before a proposed political contribution or expenditure is made or any action is taken regarding a contribution or expenditure. Only our Government Relations Department may initiate these procedures.

The regulations relating to political contributions are complex and changing. Prior to making or authorizing a corporate contribution or authorizing the use of a Reworld™ facility or resource for political purposes, please consult our Government Relations Department or our General Counsel.

Lobbying Activity

If you interact with federal, state, or local public officials on behalf of Reworld™, you may be required to register as a lobbyist at the federal, state, or local level and may also be required to disclose information about your activities.

You should not engage in lobbying activities or hire lobbyists on our behalf without the prior approval of our General Counsel or our Government Relations Department.

Inquiries from Government Agencies, Reporters and Others

From time to time, reporters, government officials, public interest groups and others will ask questions about Reworld™, or its activities or position on a particular topic. If you receive such an inquiry from a government agency orally or in writing, immediately contact our General Counsel. If you receive such an inquiry from a reporter or public interest group orally or in writing, forward it promptly to our Corporate Communications department.

International Business

One of our greatest assets in the conduct of our business around the world is our reputation, and the value of our reputation will directly affect our ability to compete and grow our business in other countries. We must constantly work to maintain, build and protect our reputation. We must always remember that when it comes to reputation, the appearance of impropriety can be as damaging as actual wrongdoing. This means not only acting as an ambassador of Reworld™ in how we interact with people around the world, but it also means complying with local laws while maintaining our values, standards, and policies.

It is our policy to engage in business practices representing the highest levels of business integrity and in full compliance with laws, in all markets in which we conduct activity. In furtherance of this policy, it is imperative that all employees involved in any manner with our business outside of the United States be aware that the following are fundamental to our business:

- We will not engage in or tolerate bribery in any form as a means to further our business interests.
- No employee is permitted to engage in any activity that constitutes bribery or other corrupt practice under local law.
- There are no exceptions to this rule.

As a U.S. company, our actions outside of the United States can have legal consequences here at home. It is important that when we are conducting business internationally, or when we engage someone else to act on our behalf, we are familiar with these laws and comply fully with them, including the United States Foreign Corrupt Practices Act. The Foreign Corrupt Practices Act contains strict rules regarding our dealings with government officials of other countries and regarding how we maintain the books and records of business conducted in those countries. The Foreign Corrupt Practices Act specifically prohibits payments (including cash or anything of value, such as gifts or services) either directly or indirectly or through a third party to foreign officials for the purpose of obtaining or maintaining business or favorable government action. Other jurisdictions in which we operate have similar laws. These laws have applicability worldwide, and serious consequences exist to Reworld™ and its employees for violations regardless of where they may occur.

The rules and regulations related to conducting business abroad can be very strict, are often complicated and can change from time to time. All matters related to proposed payments to be made to facilitate the conduct of business in a foreign country should only be considered after consultation with our General Counsel.

VIOLATIONS OF THESE LAWS CAN LEAD TO SIGNIFICANT FINES, CRIMINAL PENALTIES IMPOSED UPON Reworld™, AND POTENTIAL IMPRISONMENT AND OTHER PENALTIES FOR THOSE INDIVIDUALS INVOLVED. FAILURE TO STRICTLY ADHERE TO THIS POLICY WILL RESULT IN SERIOUS CONSEQUENCES AND MAY RESULT IN TERMINATION OF EMPLOYMENT.

For a more detailed discussion of our anti-corruption policies including the Foreign Corrupt Practices Act, please consult our [Anti-Corruption Compliance Policy](#).

Respect

We operate under the assumption and expectation of mutual respect. As a multinational corporation, we come from different places and have different backgrounds. We thrive because of these differences. Everyone who works with us or deals with us in any capacity deserves to be treated with honesty, dignity, and respect. We strive to foster an environment of inclusion and acceptance.

Discrimination and Harassment

We are committed to fostering a workplace that is free from discrimination or harassment of any kind. We fully comply with all government requirements against discrimination and harassment and will act affirmatively to achieve these objectives. An employee who has engaged in discrimination or harassment against any person will be subject to appropriate disciplinary action up to and including immediate termination of employment.

For a more detailed discussion of our policies on harassment, please consult our [Employee Manual](#).

Use and Protection of Reworld™ Assets; Information

In the day-to-day operations of Reworld™, we gain access to, or acquire knowledge of, a variety of assets that are valuable to Reworld™ including everything from cash to copy paper, from heavy equipment to confidential information or processes. We need to use and protect these assets keeping the best interests of Reworld™ in mind. Confidential information is among our most valuable corporate assets. Confidential information includes, among other things, all intellectual property such as trade secrets, patents, trademarks and business information (such as technical standards, methods, know-how, secret processes, engineering, new products, research work or developments and other non-public aspects of our businesses as well as lists of customers and suppliers).

Care must be taken whenever confidential information is discussed, handled and stored. Confidential information should never be used for personal gain.

If you have any questions about the use of Reworld™ assets or if Reworld™ assets are being misused, wasted or otherwise unprotected, please report the incident to legal immediately. You may do so anonymously if you choose; please see the section below entitled “We Want to Hear From You” for more information.

Electronic Communication and Social Media Policies

While our computer and telephone systems are intended for business use, you may use them for limited personal use. The expanding presence and use of Social Media such as Facebook, X, TikTok Instagram, Snapchat, etc., has created novel issues in the work place. If anyone abuses this privilege or otherwise misuses these systems in any way, he or she may be subject to disciplinary action up to and including termination of employment. Reworld™ owns its computer and telephone systems and everything on them. None of us has a right to privacy with respect to information received or sent through or stored on Reworld™ computer or telephone systems. Your use of these systems may be monitored, and any information contained on them may be reviewed by Reworld™ at any time, for any reason.

For more information about what constitutes misuse or abuse of Reworld™'s Computer and telephone systems please consult our [Employee Manual](#).

Outside Employment

You may not work at any other job or engage in any activity which would conflict with Reworld™'s interests, or which would reduce your efficiency in performing your employment duties, unless such outside employment or activity is approved by your supervisor and our General Counsel, and/or our Board of Directors or committee thereof, as applicable.

Conflicts of Interest

In all of our business dealings with clients, partners, suppliers, consultants and other companies, we must avoid favoritism and conflicts of interest. To the extent possible, we must also avoid even the appearance of favoritism or conflict of interest. A conflict of interest arises when a person's duties or position present an opportunity for gain – financial, or otherwise or when personal relationships could influence one's professional judgment. We will exercise good judgment and not engage in conduct that would embarrass Reworld™, compromise its reputation, or otherwise raise questions about our honesty and impartiality.

Related-Party Transactions

If you have a family, personal, or business relationship with an existing or potential customer, vendor, supplier, or other third party who is, or may be, purchasing or providing services or

We do not tolerate conduct toward another employee, vendor, contractor, or member of the public that is violent or that intimidates, harasses or threatens violence during business hours or on Reworld™ premises.

goods to any Reworld™ entity, you need to notify our General Counsel.

This restriction is broad, and covers not only the basic relationship noted above, but also (a) any organization of which you are, or a close relative is, an officer or director; (b) any organization of which you are, or a close relative is, the beneficial owner of ten percent (10%) or more of any class of securities; (c) any trust in which you have a substantial interest, or serves as trustee or in a similar fiduciary capacity; or (d) any relative of yours who may significantly influence or be influenced by a business transaction between Reworld™ and an organization with which he or she is affiliated.

All related-party transactions must be reported, in writing, to our General Counsel.

Substance Abuse

We maintain a workplace that is free of illegal drugs and alcohol and we discourage drug and alcohol abuse by our employees. Our employees may not use, possess, distribute, sell or be under the influence of alcohol or illegal drugs while on Reworld™ premises or while conducting its business. The legal use of prescribed drugs or over-the-counter medications is permitted on the job only if it does not impair an employee's ability to perform the essential functions of the job effectively and in a safe manner that does not endanger the employee or other individuals in the workplace.

A violation of this policy may, in our sole and exclusive discretion, result in discipline up to and including immediate termination of employment. Subject to applicable law, we reserve the right to require testing for drugs by urinalysis or other drug tests of any employee or applicant for employment at any time.

Violence-Free Workplace

We are committed to maintaining a safe work environment to the fullest extent reasonably possible. We do not tolerate conduct toward another employee, vendor, contractor, or member of the public that is violent or that intimidates, harasses or threatens violence during business hours or on Reworld™ premises. All employees should be treated with

courtesy and respect at all times. You are expected to refrain from fighting, “horseplay,” or any other conduct that may be dangerous to yourself or others.

Weapons and other dangerous or hazardous devices or substances are not permitted on Reworld™ premises at any time.

A violation of this policy may, in our sole and exclusive discretion, result in discipline up to and including immediate termination of employment. We have the right to investigate and search these premises in appropriate circumstances to ensure weapons and other dangerous or hazardous devices or substances are not present.

Copyright Policy

We recognize and respect intellectual property rights and our legal obligations with respect to our use of copyright protected materials. In general, you may not reproduce any copyrighted work in print, video, or electronic form (e.g. flash drive, web pages, CD's, etc) in violation of the law.

For more information on copyrights, exemptions to the prohibition on reproduction and how to obtain permission to make copies, please consult our [Copyright Policy](#).

Records Retention

You must be aware of the requirements of our record retention policy and adhere to its terms. No one should destroy, mutilate, conceal, cover up, falsify, or make a false entry in any record, document, or tangible object with the intent to impede, obstruct, or influence the investigation or other inquiry of a government agency.

For more information on the requirements related to document retention, please consult our [Records Retention Policy](#).

WE WANT TO HEAR FROM YOU

Questions and comments about any of the provisions of this Policy of Business Conduct are encouraged. We encourage an open dialog in order to reinforce our strengths, improve any shortcomings and guard against any pitfalls.

If you have any concerns about any actions being taken, or not being taken, by or on behalf of Reworld™ or any of its employees, please tell us about them.

You can always bring matters to the attention of your supervisor or manager, or members of our senior management. If you feel more comfortable raising a concern or matter with someone else, either anonymously or not, you can do so by either of the following means:

CALL our third party “hotline”. You DO NOT have to give your name.



United States
800-267-7115

Canada
800-267-7115

Report via EthicsPoint
secure website

www.Reworld.ethicspoint.com

Information reported to Navex, EthicsPoint website or Reworld™’s Audit Committee will be handled on a confidential and anonymous basis if you so desire, and the substance of your concern will be referred to Reworld™’s management for an appropriate response.

We prohibit retaliation against any employee who has filed, in good faith, a complaint or expressed a concern under this policy or under any law, or for assisting in a complaint investigation. Any supervisor or member of management who knows an employee is being harassed, discriminated or retaliated against and fails to address the situation or fails to notify higher management will be subject to disciplinary action.

ANNUAL CERTIFICATION

Annually, each employee will receive a reminder to confirm compliance with the Policy of Business Conduct for the prior year and commit to comply with the Policy in the coming year. This reminder, which will generally be sent via email at year-end in connection with the annual audit of our financial statements, will provide a link through which each employee can review an electronic copy