



Policies and Procedures Manual (“PPM”)
Anti-Harassment Policy

1.	Purpose	2
2.	Applicability	2
3.	Policy Effective Date	2
4.	General Policy	2
5.	Responsibility for a Harassment-Free Workplace	2
6.	Sexual Harassment	3
7.	Reporting Obligations	3
8.	Review by the Company of Harassment Allegations	3
9.	Non-Retaliation Statement	4
10.	Policy Contact(s)	4
11.	Related Policies and Other Resources	4

Note: The information in this Manual is the property of Republic Services, Inc. (“Republic”) and is to be used in connection with the conduct of the business of Republic and/or its subsidiaries (being collectively referred to in the policies as the “Company” or “Republic”). These policies are not intended to and do not constitute or create contractual terms of employment.



1. Purpose

The purpose of this section of the Policies and Procedures Manual (“PPM”) is to describe Republic Services, Inc.’s and its subsidiaries (“Republic” or the “Company”) approved policies and procedures on sexual and other harassment.

2. Applicability

This policy applies to all employees, as well as all vendors, contractors and visitors on Company property at any time.

3. Policy Effective Date

This policy was originally effective as of April 14, 2009 and was most recently updated on July 20, 2020 and continues to be updated from time to time. Refer to the [Policies and Procedures Manual](#) section of [Inside Republic Services](#) for the most current version of the Company’s policies.

4. General Policy

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

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

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

5. Responsibility for a Harassment-Free Workplace

Every employee is responsible for refraining from conduct or language that could reasonably be viewed as harassment and is expected to report any such conduct to management.



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

6. Sexual Harassment

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

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

Employees need to understand that conduct acceptable to them may be offensive to other employees. It is the Company's policy to prohibit inappropriate physical touching, sexually explicit language, obscene gestures, staring, sexual or gender-related jokes, display of explicit materials, comments about other employees' bodies, derogatory comments about an individual's sex, sexual orientation, gender identity or expression, repeated requests for dates or other expressions of attraction or sexual interest, and other similar behavior.

7. Reporting Obligations

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

8. Review by the Company of Harassment Allegations

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



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9. Non-Retaliation Statement

After a review is conducted, any employee who is determined to have violated this policy will be subject to disciplinary action, including, in certain circumstances, termination of employment. The Company will not take any adverse action against an individual who makes a good faith report of harassment or discrimination, or who participates in a review of such conduct. The Company does not permit employees to engage in retaliation. Retaliation means that an employee is subjected to a negative consequence for reporting a concern under this policy or participating in an investigation under this policy. Retaliation is a serious violation of this policy and should be reported immediately to the Division or Area Human Resources Manager; the Area Director, Human Resources; a Corporate Human Resources Manager; the Vice President, Human Resources; or through the AWARE Line. Any person found to have retaliated against another individual for reporting harassment, or other concerns related to this policy, will be subject to serious disciplinary action, including, in certain circumstances, termination of employment.

10. Policy Contact(s)

If you have specific questions relating to this policy, please contact your local Human Resources Manager; your Area Director, Human Resources; the Vice President, Human Resources; or Corporate Human Resources.

11. Related Policies and Other Resources

- [Non-Discrimination and Equal Employment Opportunity Policy](#)
- [Code of Business Ethics and Conduct](#)
- [Speak Up Poster](#)