# Republic Services Reporting Hotline Frequently Asked Questions

## 1. What is the Republic Services Reporting Hotline?

The Republic Services Reporting Hotline provides an anonymous reporting mechanism that helps the Company identify and resolve fraud, waste, abuse and compliance issues. The Reporting Hotline is not intended to replace existing policies or procedures or less formal methods of resolving internal complaints or concerns regarding routine employment matters. Rather it is intended to complement the processes already in place and provide an additional tools for employees. Many companies have similar hotline reporting programs like this in place.

#### 2. Who is NAVEX Global?

NAVEX Global is an independent reporting service that operates the Reporting Hotline on behalf of Republic Services. When you contact this service, you do not have to give your name (unless required otherwise by law) and your call is not recorded.

### 3. Why did Republic Services contract with a third party vendor?

NAVEX Global offers important services that would be impractical or cost prohibitive for Republic Services to provide alone. NAVEX Global provides trained interview specialists, the option of caller anonymity, 24/7 availability and aggregate reporting of trends and usage.

#### 4. For what types of situations should I contact the Republic Services Reporting Hotline?

The Reporting Hotline is designed to receive reports regarding suspected unethical or illegal activities. Such activities may include the following:

Accounting/Audit Irregularities Improper Loans to Executives Sexual Harassment
Conflicts of Interest Insider Trading Substance Abuse
Customer Relations Kickbacks Theft of Cash

Discrimination Policy Issues Theft of Goods/Services

Employee Relations Product Quality Concern Theft of Time Falsification of Company Records Release of Proprietary Information Unauthorized

Falsification of Company Records Release of Proprietary Information Unauthorized Discounts
Retaliation of Whistleblowers Wage/Hour Issues

Fraudulent Insurance Claims Safety Issues and Sanitation Workplace Violence/Threats

### 5. Is the Reporting Hotline appropriate for emergencies?

The Reporting Hotline is <u>not intended for emergency use</u>. If you are in need of emergency assistance or believe a crime is in progress, you should notify Republic Services management and/or call 911 immediately.

#### 6. What happens when I contact the Republic Services Reporting Hotline?

A customized web form or a professional interview specialist will document your concern and relay the information to a designated Republic Services official for review and follow up. Reports are handled promptly and discreetly.

#### 7. Why should I report what I know?

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner. Republic Services seeks to continue to build a successful organization with an outstanding reputation that protects the Core Values. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate any concerns to Republic Services management or Human Resources at any time.

# 8. I am aware of some individuals involved in unethical conduct, but it doesn't affect me. Why should I bother reporting it?

Republic Services seeks to promote ethical behaviors. Misconduct has implications for the entire organization and

consequently all employees. All unethical conduct, at any level, ultimately hurts everyone. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your colleagues to report it.

#### 11. What if I only suspect something is wrong?

Most instances of fraud, waste, abuse and noncompliance are discovered through tips from honest people who are not sure of all the facts. Your reporting can minimize the potential negative impact to the company. This type of good-faith report is encouraged as well as acceptable, keeping in mind that the intent of the report is to bring the issue to light, not to be malicious or hurtful.

# 12. If I know or suspect something, shouldn't I just report it to my manager or Human Resources and let them deal with it?

While you are encouraged to report suspected violations directly to your immediate supervisor or to Human Resources, Republic Services recognizes that this may not always be an option and has made the Reporting Hotline available for these circumstances. Keep in mind that the Reporting Hotline is not intended for employee complaints concerning wages, hours of work, performance evaluations, or other routine employment matters.

# 13. What if my supervisor or other managers are involved in a violation? Won't they get the report?

The report is accessed only by designated Republic Services internal investigators. During the investigation, only the appropriate parties who need to know will be contacted to properly address the issue.

### 14. Am I required to identify myself?

No. You do not have to reveal your identity when you call the Reporting Hotline or report using the website. No one will know you are the reporter unless you willingly identify yourself during the call or while completing the form online. The information you provide will be treated as confidential and privileged to the extent permitted by law.

#### 15. What legal protection do I have when I report?

There are laws that protect individuals who provide confidential information regarding possible illegal activities in the workplace. Therefore, Republic Services is not allowed to penalize those employees who provide good-faith reports of this nature. Republic Services is committed to maintaining the confidentiality and anonymity of a reporter to the extent allowed by law. However, employees who intentionally and maliciously use the Reporting Hotline to make false allegations shall be subject to disciplinary action if identified.

# 16. I am concerned that the information I provide Republic Services may ultimately reveal my identity. How can you assure me that may not happen?

Republic Services's system is designed to protect your anonymity. However you, as a reporting party, need to ensure that the body of the report does not reveal your identity by accident through use of terms such as "my boss," "in XYZ building where I work," or "since I was hired in 1998," etc. Further, confidentiality and anonymity of a reporter is maintained to the extent permitted by law. However, it is important to recognize that a time may come during the investigation that you will be contacted through the Reporting Hotline to come forward to allow the investigation to proceed. Your options will be explained, and it will be your decision. You may view the privacy policy of NAVEX Global in the response to question number 25 of this FAQ.

#### 17. Is the telephone Reporting Hotline confidential and anonymous, too?

Yes. You will be asked to provide the same information that you would provide in an internet-based report, and an interviewer will type your responses into the website.

# 18. Can I file a report from home and still remain anonymous?

The Reporting Hotline provided by NAVEX Global is required by contract to protect your anonymity. Your report is anonymous regardless of where you are when you file your report.

### 19. Where do these reports go? Who can access them?

Reports are referred only to specific individuals at Republic Services who are charged with evaluating the type of

violation and facts of the incident on a case-by-case basis. Each report recipient has had training in keeping these reports confidential.

# 20. What if I remember something important about the incident after I filed the report? What if NAVEX GLOBAL has further questions for me concerning my report?

When you file a report you will receive a unique report ID number, a PIN number and a follow up date. You can return to NAVEX Global system again either by internet or telephone and access the original report. You can then answer questions posed by a Republic Services representative and add further information that may help resolve open issues. We strongly suggest that you return to the site in 14 days to answer any questions submitted by those reviewing the report. This will help to expedite a resolution to your report.

#### 21. Are follow up reports as secure as the initial report?

All follow up correspondence is held in the same strict confidence as the initial report continuing under the umbrella of anonymity.

### 22. How do I know an investigation is taking place based on my report?

Republic Services is committed to promptly investigating all reports of unethical, illegal or inappropriate activity. When an issue is reported through the Reporting Hotline, the specific action taken may depend on the nature and severity of the alleged violation. You can be assured that compliance related reports will be investigated; however, in order to maintain confidentiality and anonymity of all parties involved you may not be aware that an investigation has taken place. On the follow up date, you will be provided with a brief message that may provide you additional information.

## 23. What if I want to be identified with my report?

If you wish to be identified, the opportunity exists. During your report, you will be asked if you wish to be identified and you may provide your name.

#### 24. What should I do if I'm served with a subpoena? (Do most clients retain this?)

Contact the Republic Services Legal Department as soon as possible. Until you receive their guidance, preserve any relevant documents and avoid answering any questions, providing documentation or permitting a search of the premises. This ensures that legal rights are preserved and responses are accurate, timely and appropriate.

# 25. To whom within Republic Services should I address any questions I have about the Republic Services Reporting Hotline?

If you have questions or concerns about the Reporting Hotline, you may contact Director, Ethics and Compliance at ethicsandcompliance @republicservices.com.