



We protect what matters.

Modern Slavery Report 2023

STERICYCLE CANADA

This Modern Slavery Report is being provided by Stericycle, ULC (“**Stericycle Canada**” or the “**Company**”) on behalf of itself as required under section 11 of the federal *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) for the purposes of complying with the Act (this “**Report**”). Stericycle Canada is a wholly-owned subsidiary of Stericycle, Inc. (“**Stericycle**”).

This Report cannot be used or disclosed for any purpose whatsoever other than as mandated under the Act. As required by the Act, this Report addresses the period from January 1 to December 31, 2023 and is based upon the information Stericycle Canada has been able to confirm as accurate as of the time of submission of the Report. Stericycle Canada reserves its rights, without limitation, to amend or supplement the content of this Report at any time for any reason.

1. Introduction

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. As a compliance solutions provider, Stericycle Canada recognizes the important role that we have in ensuring that our operations and services, and the supply chains that support these, adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour in our services or supply chain. This Report sets out the good faith steps we have taken prior to and during 2023 to reduce any potential risk Stericycle Canada may have that modern slavery is used at any step in the provision of services in Canada or elsewhere by, or on behalf of, Stericycle Canada.

2. Our Business

Stericycle Canada is a leading compliance solutions provider delivering services for medical waste, sharps management, pharmaceutical waste, information destruction and related compliance services to the health care industries across Canada.

Stericycle Canada is aware of the risks of modern slavery within its supply chain and has developed its Procurement Team’s competence to identify these risks and the actions needed to manage and mitigate these risks. It is a fundamental tenet of Stericycle’s business to conduct business with honesty, integrity and in accordance with the highest ethical standards, including as it relates to the risks of modern slavery.



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3. Our Policies

Stericycle Canada has in place the following key policies to support its strategy in prohibiting modern slavery, ensuring we are conducting business in an ethical and transparent manner. These include:

Employee Code of Conduct

The Employee Code of Conduct is a reference guide – a place to seek clarity on the shared values and fundamental principals that define how Stericycle, including Stericycle Canada, operates. The Code publicly affirms Stericycle’s commitment to compliance with the many laws, regulations and other requirements that govern the way the Company operates, as well as our commitment to the values and standards of behaviour to which it holds Stericycle’s team members, specifically including the protection of human rights. The Code also provides information on how team members can report concerns.

Procurement and Supplier Engagement Policy

Stericycle’s Procurement and Supplier Engagement Policy outlines requirements to ensure it operates consistent and compliant procurement at all times.

Statement on Human Rights

Stericycle’s Statement affirms the Company’s commitment to safeguard human rights generally, including the promotion of fair labor practices and voluntary employment, free of any aspect of forced or compulsory labor such as child labor, forced labor, modern slavery or human trafficking.

Modern Slavery Policy

This policy sets out Stericycle’s prohibition on modern slavery and explains how employees can identify it and where they can go for help.

Recruitment Policy

Stericycle operates a robust recruitment policy, including conducting eligibility to work checks in Canada for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Suppliers Code of Conduct

This Stericycle code explains the way in which Stericycle expect its suppliers to act. The Supplier Code specifically indicates that Stericycle expects suppliers to abide by all applicable labour laws and regulations, including those governing workplace conditions, wage and compensation and collective bargaining and free association. It also clarifies that suppliers must also avoid the use of child labour or labour sources from organizations or individuals associated with human trafficking.



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Reporting and Internal Investigations Policy

This policy imposes a duty on all Company personnel to report in good faith any violation or potential violation of the law or regulations, Stericycle's Code of Conduct or any internal policy or procedure, including matters of modern slavery. It also explains the Company's duty to conduct appropriate investigations in a fair manner.

Raising concerns and asking questions are important ways in which Stericycle Canada demonstrates the Company's commitment to ethical conduct and protection of its workforce and the Company. Individuals with questions or concerns can make reports using a telephone or internet/web-based reporting service (the Ethics Line) including anonymously, where permitted by law. Information on submitting a report can be found at www.stericycle.ethicspoint.com. Stericycle has a zero-tolerance policy on any form of retaliation against any team member who makes a report of misconduct in good faith or who cooperates in a Company investigation.

Governance

Oversight and execution of Stericycle's policies is managed jointly by the Human Resources, Office of Ethics and Compliance, Procurement, Environmental, Social & Governance (ESG), and Legal Departments. Members of these functions meet to review Stericycle's policies, procedures and progress regarding the prevention of modern slavery.

4/5. Assessing Our Risk / Our Commitments

Stericycle Canada will not knowingly support or deal with any business involved in slavery or human trafficking. We have zero tolerance for such activities in our supply chain.

Our procurement activities encompass the planning and management of all activities involved in sourcing, procurement and logistics management. This includes coordination and collaboration with Stericycle's partners, which can be suppliers, service providers and customers.

Commitment in Action

- Stericycle ensures that all potential and incumbent suppliers are dealt with professionally, fairly and ethically and that it upholds the principles of sustainable procurement at all times. Stericycle favours suppliers that operate under recognized ethical codes of conduct.
- Modern slavery is a key topic specifically covered in Stericycle's Corporate Statement on Human Rights. Stericycle Canada has in place policies and systems to ensure that we identify, assess and mitigate potential risk areas in its supply chains, source goods and services ethically, identify individuals being forced to work against their will and protect whistleblowers.
- In 2023, Stericycle expanded its corporate supplier/third party evaluation process to include a comprehensive screening of potential third-party ethics and compliance risk.



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This process includes the evaluation of new and existing third parties used by Stericycle in respect of corruption and adverse media reports, which covers approximately 1,000 agencies and almost 2,000 watchlists globally. These lists monitor dozens of corruption and enforcement topics, including child labour, human trafficking and modern slavery. For certain third parties identified as potentially higher risk, a more in-depth review of corporate owners/representatives is conducted. These evaluations are conducted and documented under the oversight of Stericycle's Office of Ethics and Compliance.

- In Canada, we have a New Supplier Review Board, which is responsible for approving all potential suppliers onto our supply chain. To pass this stage gate, the requestors are required to provide detailed information of the suppliers following due diligence activity. This addresses areas such as accreditation, registration, insurance policies, director checks, financial risk analysis, human resource policies, ethical sourcing and supplier code of conduct, anti-bribery, quality systems, manufacturing inspection and testing, equipment maintenance, returns and complaints processes and internal audits.
- Stericycle audits its supply base quarterly to remove any unused or unnecessary suppliers. Additionally, Stericycle's Office of Ethics and Compliance periodically refreshes due diligence in order to keep our supply base as up to date and compliant as possible

Training

As part of Stericycle's commitment to eradicating modern slavery, we are members of the International Partnership of Human Rights Forum for Waste & Recycling Working Group, to drive a positive change to improve the human rights of workers in our supply chains.

On a bi-annual basis, all team members globally, including all Stericycle Canada employees, undertook training of the Code of Conduct which stresses acting ethically.

Additionally, we intend to build on our knowledge and capacity in relation to slavery and human trafficking by ensuring that we target key areas of our business and partner with leaders within the "fight against modern slavery," recognising we can contribute to improve upon our existing process and knowledge.

Due Diligence

Stericycle Canada expects third parties with which we work to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. Before making any commitments towards third parties, we take steps to appropriately evaluate the relationship and mitigate any associated risks by carrying out risk-based due diligence and checks.



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6. Our Progress and Effectiveness

In addition to our training program for our Procurement team, we plan to develop a modern slavery awareness training program which shall be targeted at our business and operational leaders who engage with suppliers plus our Human Resources team.

We work in highly regulated sectors for a wide variety of public and broader-public customers. The effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking are not taking place within our business or supply chains will be known if no reports are received from employees, the public, our customers, regulators or law enforcement agencies to indicate that modern slavery practices have been identified.

7. Approval & Signature

This Report was approved by Richard Michael Moore for Stericycle Canada pursuant to section 11(4)a of the Act and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report will also available on our company website at www.Stericycle.com.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for Stericycle Canada. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

A handwritten signature in black ink that reads "Richard M. Moore".

Richard Michael Moore

President & Director, Stericycle, ULC

Duly authorized to bind Stericycle Canada.