

SV 5.0 Human Rights Policy

This policy applies to all Clean Harbors affiliated companies (collectively, “Clean Harbors”). Clean Harbors acknowledges its responsibility to respect human rights. We are committed to the fundamental human rights principles and affirm to our employees, customers, shareholders, and the public that we will always conduct our business activities in a manner which respects human rights and strives to create better standards of life and freedom for individuals. Respect of human rights is fundamental to the sustainability of our organization and critical to maintaining the respect of the communities in which we operate. Clean Harbors complies with all national, regional, and local laws and requirements as they pertain to human rights in the areas in which we do business. Our Core Values (Safety, Teamwork & Collaboration, Integrity, Customer Service, and Stakeholder Value) support and inform our commitment to human rights. These values are put into practice every day by our employees, and we expect the same from our business relationships, including our partners and suppliers. In addition to our core values, our Code of Ethics and Business Conduct, policies, procedures and training programs support fundamental human rights and are aligned with our Human Rights Policy.

While human rights are the responsibility of every employee and our Board of Directors, the executive oversight of the Human Rights Policy resides with our Chief Executive Officer and our Chief Human Resources Officer, General Counsel, and Chief Compliance Officer. The Environmental, Health and Safety Committee of our Board of Directors oversees the Human Rights Policy as part of its responsibilities. Actions and procedures to implement the policy include awareness and training, contract language, due diligence, third-party anonymous ethics reporting, organizational accountability, and regular review. This Human Rights Policy applies to Clean Harbors and its majority-owned subsidiaries, regardless of geographic location, and we expect our suppliers and partners to uphold these principles as well. Clean Harbors respect of human rights is demonstrated in our following employment practices:

- **Equal Opportunity, Inclusion and Respect** - We are committed to fostering a positive and diverse workplace that is safe and free from discrimination, harassment, intimidation and retaliation. We provide equal opportunity in employment and allow for reasonable accommodations for any qualified applicant or employee who has a disability (as defined by federal or state law). We also provide reasonable accommodations for our employees’ religious beliefs. Equal employment opportunity is a management commitment in every aspect of personnel policy and practice; including the selection, placement, compensation, training, and advancement of employees. We promote an inclusive environment where all individuals are welcomed and valued. Clean Harbors has adopted policies and training that address the protection and support of the rights of women and minorities in the workplace. All applicants and employees are respected and treated as individuals without regard to their race, color, religion, sex, sexual orientation, gender identity or expression, national or social origin, ethnicity, age, disability, veteran status, genetic testing or any other classification protected by law. This means that we will not tolerate unlawful discrimination with respect to any employment-related decision or practice.

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- **Healthy Workplace and Lifestyle** - We prioritize safety above all else. Continually improving safety at Clean Harbors is our commitment. We believe that an accident free workplace is a goal we can achieve and that no one should get injured while working at Clean Harbors. We are committed to operating our facilities and equipment in a safe and efficient manner and in compliance with all applicable federal, state and local safety and health laws, regulations and standards. Our safety culture is embedded throughout our operations in our *Safety Starts with Me: Live It 3-6-5* safety program. This safety program and related safety training are designed to ensure a safe work environment that is free from recognized hazards and provide proactive measures to prevent accidents that could cause injury or property damage to employees, customers or the public.

We have established Employee Wellness Programs to promote a culture of health for the benefit of our workforce and to drive engagement in our health and retirement plans.

- **Safe and Secure Workplace** - We promote a workplace free from violence. Any acts or threats of violence will not be tolerated. We have security safeguards designed to protect our employees and physical assets and will continue to monitor and enhance our security measures as appropriate to strengthen the safety and security of our employees.
- **Pay, Benefits and Work Hours** - Our employee compensation is competitive and reflects geographical differences, complexity and scope of position, and business unit or division, while remaining consistent with all applicable laws. Pay is determined by the Company based on market considerations and a variety of business factors, including applicable collective bargaining agreements. We are committed to providing competitive health, welfare, and retirement benefits for employees. We implement measures to ensure that work hours, meal and rest periods, and overtime comply with federal and state laws.
- **Freedom of Association and Collective Bargaining** - In accordance with applicable labor laws, we respect the right of our employees to form, join or assist labor organizations and to bargain collectively through representatives of their own choosing without fear of retaliation, intimidation or harassment. We further recognize that our employees have a legal right to refrain from such activities. The Company is committed to bargaining in good faith with our employees' representatives. Our employees and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.
- **Forced Labor, Human Trafficking and Child Labor** - We prohibit the use of all forms of forced labor, including, but not limited to, prison labor, military labor, slave labor and any form of human trafficking. We do not employ children or support the concept of child labor.

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- **Community and Stakeholder Engagement** - We are dedicated to being a good neighbor in the communities in which we live and work. Where appropriate, we engage with a wide range of civil society and stakeholders on human rights issues related to our business. We seek opportunities to work with our employees, contractors and suppliers to develop and participate in knowledge-sharing and training, increasing our shared understanding of human rights and improving our collective performance in delivering on the principles outlined in this policy. Clean Harbors focuses its charitable giving and volunteer services on community development and neighborhood revitalization in the communities we serve or have operations located. Our goal is to help build stronger and safer communities. As part of our commitment to safety, disaster relief and social services, we encourage the volunteer activities of our employees in the communities where they live and work. We highly value the commitment of our employees and consider their feedback when making decisions involving our support of local non-profits and community activities.

Guidance and Reporting Concerns

We are committed to fostering a positive and open working environment where employees are comfortable sharing ideas, thoughts and concerns. We strive to maintain an ethical culture in which employees can report dishonest or unethical behavior without fear of retaliation. This includes raising concerns about potential violations of our Standards of Ethical Professional Conduct and related policies, including our Human Rights Policy. All employees are encouraged to seek guidance from their supervisor, a Director of Human Resources, the Chief Compliance Officer, or the Company's General Counsel if they have reason to believe the Company's human rights standards are being violated. In addition, an employee can contact the Company's Integrity line (1-800-949-8653) to make a confidential report of a violation or suspected violation. Any suspected violations of law or Clean Harbors Standards of Ethical Professional Conduct for Clean Harbors and its Officers, Directors & Employees must be reported in accordance with the Company's Ethic's Policy. Any concerns are addressed using a robust internal process whereby we investigate, respond and take appropriate corrective actions if warranted. We regularly update our policies and practices based on our findings. Additionally, in our unionized workplaces, employees also may raise grievances regarding some types of workplace issues in accordance with their specific location's applicable grievance procedure.

We do not permit allow retaliation or intimidation against anyone who reports a concern, raises a compliance question, seeks advice or cooperates in an investigation. Anyone who retaliates or attempts to retaliate will be subject to disciplinary action, up to and including termination of employment.

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