

# UN Global Compact Report 2021

## Statement of Continued Support by the Chief Executive Officer

Statement of the company's chief executive (CEO or equivalent) expressing continued support for the Global Compact and renewing the company's ongoing commitment to the initiative and its principles.

Dear Mr. Secretary-General,

I am writing to express Rubicon's continued support of the ten principles of the Global Compact with respect to human rights, labor, environment, and anti-corruption. In 2011, Rubicon® committed to making the Global Compact and its principles part of the strategy, culture, and day-to-day operations of our company, and I am proud to report that we have and will continue to do so.

Our eighth Communication on Progress describes our efforts to support the ten principles this year, and our goals for the coming year.

We will continue to support the efforts of the United Nations in these areas and look to the UN for guidance and thought leadership.

Sincerely,  
David Rachelson  
Chief Sustainability Officer  
Rubicon

## Human Rights

### Assessment, Policy and Goals

Description of the relevance of human rights for the company (i.e. human rights risk-assessment). Description of policies, public commitments, and company goals on human rights.

As a long-time Certified B Corporation, Rubicon is committed to the following principles:

- We will conduct business as if people and place matter
- We will build products and services that aspire to do no harm and benefit all

Our organizational values compel us to operate in alignment with the Universal Declaration of Human Rights, and in such a way as to enable our stakeholders to thrive. Moreover, Rubicon's mission to end waste, in all its forms, is inspired by a desire to help build an environmental, social, economically healthy, and productive world, in which current and future generations' needs are met.

## **Implementation**

**Description of concrete actions to implement human rights policies, address human rights risks, and respond to human rights violations.**

Rubicon's has an Employee Handbook, updated annually, that outlines the terms for our compliance with all applicable laws, fair labor conditions, equal employment opportunity, and anti-corruption and other relevant trade practices.

Additionally, in 2020, Rubicon completed a formal materiality assessment, conducted under the direction of Quantis, a leading third-party sustainability consultant, to provide our internal and external stakeholder groups an opportunity to tell us what kind of value, broadly speaking, we should be creating through our business operations. This included questions covering topics related to human rights.

The results of the materiality assessment led to the development of action plans to advance our progress in areas such as diversity and inclusion, employee benefits, and gender equality. Our goals in those areas will be announced in our upcoming 2021 ESG Report.

## **Measurement of Outcomes**

**Description of how the company monitors and evaluates performance.**

As mentioned above, Rubicon is in the process of establishing formal indicators related to our social and environmental performance. We intend to report on those quantitative measures on at least an annual basis. In addition, Rubicon uses third-party assessments tools like B Lab's B Impact Assessment to measure its performance and identify any gaps. Rubicon's next B Lab certification and B Impact Assessment results will be available in late summer 2021.

To view Rubicon's 2018 B Impact Assessment, please visit:

<https://bcorporation.net/directory/rubicon-global/>

To learn more about Rubicon's mission as a B Corp, please visit:

<https://www.rubiconglobal.com/video-stand-b-corp/>

## **Labor**

### **Assessment, Policy, and Goals**

**Description of the relevance of labor rights for the company (i.e. labor rights, related risks and opportunities).**

**Description of written policies, public commitments, and company goals on labor rights.**

Our success as an enterprise hinges on the well-being and productivity of our employees. Consequently, we are committed to cultivating a work environment characterized by respect, continuous learning, equal opportunity, in which our employees are able to grow.

This starts, but does not end with, compliance: Rubicon adheres to the laws set forth by the U.S. Department of Labor and all applicable state agencies. Our Human Resources team regularly reviews and updates all HR policies and assessed risks and sets goals in this area.

As mentioned above, in 2020, Rubicon and our stakeholders jointly completed a materiality assessment, which helped us to identify the social and environmental issues most relevant to our business operations. This process yielded valuable insights from, arguably, our most important stakeholder group: employees.

As a result, Rubicon has established an action plan to build on the work we've already done to make our company a great place to work, which covers themes such as diversity and inclusion, employee benefits, and gender equity. Rubicon plans to publicly release company diversity and inclusion goals in our upcoming 2021 ESG Report. These goals address increasing BIPOC representation across all levels of the company, including our Board of Directors, as well as pay equity, and providing professional development opportunities to minority employees.

### **Implementation**

**Description of concrete actions taken by the company to implement labor policies, address labor risks, and respond to labor violations.**

Over the past three years, Rubicon continued to introduce and implement new policies and benefits for our employees, based on employee feedback and ESG best practices. Some of these benefits and policies include unlimited paid-time-off for all exempt Rubicon employees, paid-time-off for volunteer hours for all full-time employees based on their tenure at Rubicon, paid-time-off for non-exempt employees' work anniversaries, one week of optional personal development for associates every two years, and sponsored fitness and financial education classes to support employee health and wellness.

We formally solicit feedback from our employees on an annual basis, using third-party assessments like the annual Great Places to Work certification and, in 2020, a materiality assessment. The results of Rubicon's materiality assessment will be detailed in our 2021 ESG Report. In February 2021, Rubicon was certified as a "Great Place to Work" by the third-party organization, Great Places to Work®, for the fourth consecutive year.

Moreover, we have established formal channels that allow employees to report perceived violations of our Code of Conduct including a whistleblower hotline that allows employees to report unethical behavior confidentially. Information on the whistleblower policy is posted on Rubicon's internal employee intranet site while updates and annual training are communicated via our General Counsel to all employees.

We will continue to engage our employees in dialogue, as we feel that is the most direct and effective way to continuously improve our labor practices.

To view Rubicon's "Great Place to Work" profile, please visit <https://www.greatplacetowork.com/certified-company/7005929>

### **Measurement of Outcomes**

**Description of how the company monitors and evaluates performance.**

Historically, we have monitored our performance in the area of labor practices through employee satisfaction surveys, conducted once a year through our annual Great Places to Work® certification. Beginning in 2021, we will be supplementing our surveys with additional quantitative measures in the areas of diversity and inclusion, pay equity, and employee benefits. This will be reported on annually in Rubicon's future ESG reports.

## **Environment**

### **Assessment, Policy, and Goals**

**Description of the relevance of environmental protection for the company (i.e. environmental risks and opportunities). Description of policies, public commitments, and company goals on environmental protection.**

Rubicon's competitive advantage over industry peers hinges on our ability to deliver superior environmental outcomes for our customers. Put more simply, to help our customers reduce their waste, while conserving their human and financial resources in the process.

Reducing waste generation from industrial activities is a key priority in addressing the climate crisis we are collectively facing. In 2020, we chose to supplement pre-existing commitments surrounding waste reduction and diversion with a broader commitment to reduce the carbon intensity of our operations, committing to achieve net zero emissions by 2040. In 2021 Rubicon joined as a signatory to The Climate Pledge, an environmental protection initiative co-founded by Amazon and Global Optimism. Signatories of the Pledge commit to reaching net zero carbon emissions by 2040, ten years ahead of the goal set out in the United Nations' Paris Climate Agreement.

### **Implementation**

**Description of concrete actions to implement environmental policies, address environmental risks, and respond to environmental incidents.**

To achieve our net zero emissions goal, we have established a climate reduction roadmap, which will be included in our 2021 ESG Report. These include strategies to expand our smaller hauler partners' access to green financing, increasing the affordability of diversion options

despite challenging markets, and providing customers with best-in-class data reports on the environmental impact of their waste.

### **Measurement of Outcomes**

**Description of how the company monitors and evaluates environmental performance.**

As a Certified B Corporation, we believe we are holding Rubicon to the highest existing standard for businesses. However, in addition to our use of third-party assessments like the B Impact Assessment to measure our environmental performance, we are supplementing our annual reporting with additional environmental KPIs, which will be announced in our 2021 ESG Report. In addition, Rubicon's Trucost-verified process measures landfill diversion and greenhouse gas emissions avoidance on behalf of its customers.

## **Anti-Corruption**

### **Assessment, Policy, and Goals**

**Description of the relevance of anti-corruption for the company (i.e. anti-corruption risk-assessment).**

**Description of policies, public commitments, and company goals on anti-corruption.**

In 2017, Rubicon updated its broad anti-corruption/anti-bribery policy. This updated policy is designed to provide clear guidance for all Rubicon employees in terms of dealing with government officials, vetting and validating third party service providers before formal engagement, and setting standards that comply with the U.S. Foreign Corrupt Practices Act and similar laws of other countries. In addition to an anti-corruption/anti-bribery policy, Rubicon also has a CEO policy that governs ethical practices in the Office of the CEO.

### **Implementation**

**Description of concrete actions to implement anti-corruption policies, address anti-corruption risks, and respond to incidents.**

Rubicon updated its anti-corruption and anti-bribery policy in 2017; it is reviewed on an ongoing basis. Information on Rubicon's anti-corruption system, including specifically the whistleblower hotline for reporting suspected violations of the anti-corruption policies, is posted on Rubicon's internal employee intranet site while updates and annual training are communicated via our General Counsel to all employees.

### **Measurement of Outcomes**

**Description of how the company monitors and evaluates anti-corruption performance.**

Measurement will include cooperation amongst the Legal, Finance, Sales, and Business Development teams as Rubicon looks to expand its business in the United States and abroad to

ensure any government-related and commercial activities comply with the policies and applicable laws.

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