

# UN Global Compact Report 2022

## 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 ninth 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

## 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 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 inspire us to operate in alignment with the Universal Declaration of Human Rights, and in such a way as to enable our stakeholders to thrive. Our policies and practices ensure a safe work environment for all employees. In the 2022 Great Places to Work (GPTW) survey, 99% of our employees stated they feel physically safe at work, and 95% of our employees strongly agreed that they are treated fairly at work regardless of their sexual orientation, race and/or gender. Rubicon pays a living wage to all employees, does not

mandate overtime, and abides by the overtime regulations in all states in which our employees reside. Moreover, Rubicon's mission to end waste 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 has an Employee Handbook, updated annually, that outlines the terms for our compliance with all applicable laws, fair labor conditions, equal employment opportunity, 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 assessment included questions covering topics related to human rights.

The results led to the development of action plans to advance our progress in areas such as diversity and inclusion, employee benefits, and gender equality. The following material topics in this area were detailed in our [2020 Corporate Citizenship Report, released in 2021](#):

- Providing adequate benefits for our employees
- Promoting diversity and practicing non-discrimination
- Promoting a corporate culture of learning, inclusion, and professional growth

## **Measurement of Outcomes**

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

As mentioned above, Rubicon has established formal indicators related to our social and environmental performance. We intend to report on those quantitative measures on 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 later in 2022.

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.rubicon.com/about/b-corporation/>

# 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 depends on the well-being and productivity of our employees. Consequently, we are committed to cultivating a work environment characterized by respect, continuous learning, and equal opportunity, in which our employees can grow.

This starts, but does not end, with compliance: Rubicon adheres to all applicable Federal, State, and local regulations. Our Human Resources team regularly reviews our business policies, procedures, and practices to ensure that they are compliant. While not an exhaustive list, we regularly review our hiring practices, employment forms, employee records, organization charts, job descriptions, company handbook, and policies to ensure not only legal compliance but also the inclusion of best practices and industry standards.

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. The broader goals have been mentioned above. Rubicon plans to continue discussing relevant environmental, social, and governance disclosures in our upcoming 2021 Corporate Citizenship Report.

## **Implementation**

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

Over the years, Rubicon has continued to implement new policies and benefits for our employees, based on employee feedback and environmental, social, and governance best practices.

Rubicon provides 100 percent paid health care premiums for our exempt employees, spouse/domestic partners, and their dependents. This includes medical, dental, vision, short and long-term disability, and life insurance. We offer unlimited paid time off for exempt employees, flexible work hours, and in 2020 the company went fully remote to offer an added layer of flexibility for all Rubicon employees. Employees are eligible to join the company 401(k) program after 90 days, which includes a company match. The company offers six weeks of paid maternity or adoption leave with one additional month of paid leave for every year of service up to 14 weeks, as well as eleven days of paid paternity leave. The company also offers paid

time for volunteering in the community and financial wellness seminars to employees. Rubicon also has various affinity groups: African-American; Asian American and Pacific Islander (AAPI); LGBTQ+; Latin American and Caribbean; Veterans; and Women in Leadership.

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 were detailed in our [2020 Corporate Citizenship Report](#). In March 2022, Rubicon was certified as a “Great Place to Work” by the third-party organization, Great Places to Work®, for a fifth 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. In Rubicon’s most recent 2022 Great Places to Work® survey, 93% of employees felt that people at Rubicon were treated fairly, regardless of their race and regardless of their gender while 95% of employees said Rubicon has special and unique benefits. Rubicon will continue to explore supplementing our current surveys with additional quantitative measures aligned with environmental, social, and governance best practices.

## **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. In 2020, we conducted a materiality assessment to identify those environmental issues that matter most to our stakeholders. We interviewed a wide variety of stakeholder groups including employees, customers, Board members, and suppliers. Collectively, they identified the following environmental issues as most pressing:

- Reducing greenhouse gas emissions
- Reducing food waste and promoting composting
- Promoting sustainable practices throughout our supply chain/vetting our suppliers using environmental criteria

Following the materiality assessment, we elected 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 by joining as a signatory to The Climate Pledge, an environmental protection initiative co-founded by Amazon and Global Optimism, in December 2020. Signatories of The Climate 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.

One of the first steps in our climate strategy was completing our first CDP submission in 2020, followed by our first TCFD scenario analysis of our own operating facilities in 2021. Rubicon continues to report to CDP annually. In 2022, we expanded our TCFD work to include a broader analysis of the risks and opportunities in our value chain and submitted emissions reduction goals to the Science Based Targets initiative (SBTi). We anticipate approval of those targets in mid-2022.

## **Implementation**

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

In 2021 to achieve our net zero emissions goal, we established a climate reduction roadmap, which includes two broad pillars of work – prioritized based on their respective contributions to our organizational carbon footprint: (1) Driving increased adoption of circularity (reuse, reduction, recycling) among our customers and (2) decarbonizing our supply chain through initiatives such as electrification of our hauler network.

To accelerate progress against our broad environmental goals, in 2021 we established task forces and working groups to target different priority workstreams within each of the broader pillars. These include taskforces working on two of the major challenges within the first pillar – increasing plastics recycling and scaling up commercially viable circular economy solutions for our customers. We have also developed quantitative performance metrics and anchored incentives to them.

Finally, as mentioned above, we have invested significant resources in activities like climate scenario analysis to better understand our company's environmental risk profile, as well as our climate-related business opportunities. We are incorporating these considerations into our broader risk management and business strategy processes.

## **Measurement of Outcomes**

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

Rubicon tracks a variety of environmental indicators, both for use as internal KPIs to which a portion of employee bonuses are anchored, as well as for use in Rubicon's ESG reporting. Currently, Rubicon reports to both B Lab and CDP, established third-party ESG assessments of corporate environmental performance, and we have seen consistent year-on-year improvement in our performance with both reporting frameworks. Our annual reporting is evolving with the goal of meeting changing stakeholder expectations. We anticipate this will continue, with additional environmental KPIs being announced in future corporate citizenship reports.

## **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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