

Privacy Policy

Introduction

At SECURE Waste Infrastructure Corp. ("SECURE," "we," or "our"), we are committed to maintaining the accuracy, confidentiality and security of your personal information. This policy describes the personal information that SECURE collects from or about individuals who seek to be, are, or were employed by SECURE and any of its subsidiaries ("you," "your"), how we use, and to whom we disclose that information.

Privacy Policy

It is SECURE's policy to comply with the privacy legislation within each jurisdiction in which we operate. Sometimes the privacy legislation and / or an individual's right to privacy are different from one jurisdiction to another. This privacy policy covers only those activities that are subject to the provisions of Canada's federal and provincial privacy laws, as applicable.

This policy has a limited scope and application. Consequently, the rights and obligations contained in this policy may not be available to all individuals or in all jurisdictions. If you are unsure if or how this policy applies to you, please contact our Privacy Officer for more information.

During the course of normal business activities, SECURE collects personal information from and about employees, clients and business partners/associates. We recognize our professional obligation to maintain the confidentiality of our clients' and employee information. This policy has been developed with those obligations in mind and adherence to this policy is the responsibility of all employees.

SECURE endeavors to comply with all applicable regulatory requirements, including the Personal Information Protection Act (PIPA) concerning the collection, use or disclosure of personal information.

The Vice President, People and Culture is designated as the Corporation's Privacy Officer.

1. Personal Information

1.1 For the purposes of this policy, personal information is any information about an identifiable individual, other than the person's business title or business contact information when used or disclosed for the purpose of business communications. This may include an individual's name, home address and phone number, personal e-mail address, age, sex, marital or family status, an identifying number, financial information, educational history, etc.

2. Collection, Use and Disclosure of Employee Personal Information

2.1 SECURE may collect, use, or disclose your personal information for the purposes of establishing, managing, or terminating an employment relationship, and for any other purposes permitted or required by law. To the extent required by applicable law, we will provide you with notice and/or seek your consent to collect, use, or disclose your personal information. We may seek your consent to collect, use, or disclose your personal information for additional purposes, such as providing employees information about a workplace charitable giving program).

2.2 We collect and maintain different types of personal information in respect of our employees, including personal information contained in:

- (a) resumes and/or applications (including educational background, work history and references);
- (b) references and interview notes;
- (c) photographs and videos;
- (d) policy acknowledgement forms;
- (e) background verification information;

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- (f) offer letters and employment contracts;
- (g) financial information and payroll information, such as social insurance numbers, social security numbers, pay cheque deposit information, and tax-related information;
- (h) wage and benefit information;
- (i) workplace performance evaluation;
- (j) forms relating to the application for or changes to employee health and welfare benefits, including, short and long term disability, life insurance, optional life insurance, accidental death & dismemberment, medical and dental care;
- (k) emergency contacts;
- (l) beneficiary and emergency contact information; and
- (m) any other information you choose to provide or make available.

2.3 SECURE may collect, use and disclose personal information for the following purposes:

- (a) establishing, managing, or terminating an employment relationship with you;
- (b) determining eligibility for employment including data required for pre-employment alcohol, drug, and other required medical testing, verifying employment qualifications and references;
- (c) establishing and implementing training and development requirements;
- (d) assessing performance and managing performance issues as they arise;
- (e) compiling directories and telephone lists;
- (f) for business continuity;
- (g) protecting the rights of SECURE and the security of personnel, information and property;
- (h) administering pay and benefits;
- (i) processing employee work-related claims (e.g. benefits, workers' compensation, insurance claims);
- (j) complying with applicable laws (e.g. Canada Income Tax Act, Provincial Employment Standards Code);
- (k) obtaining criminal background checks;
- (l) to comply with legal processes such as search warrants, subpoenas or court orders;
- (m) as part of SECURE's regular reporting activities to affiliates;
- (n) during emergency situations or where necessary to protect the safety of a person or group;
- (o) such other purposes as reasonably necessary to carry out SECURE's business operations and activities;
- (p) any other purpose described in this policy;
- (q) any other purpose for which you consent; and
- (r) as otherwise permitted or required by applicable law.

2.4 In addition to the information contained in the examples listed in this policy, we may also collect identification information about you and your dependents or beneficiaries, such as name, home address, telephone, personal email address, date of birth, employee identification number and marital status, specific medical information that you provide to us and any other information that is voluntarily disclosed by you.

2.5 As a general rule, SECURE collects personal information directly from you. In most circumstances where the personal information that we collect about you is held by a third party, we will obtain your permission before we

seek out this information from such source (such permission may be given directly by you, or implied from your actions)

- 2.6 From time to time, we may use the services of third parties in operating our business. We may also receive personal information collected by those third parties in the course of the performance of their services for us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.
- 2.7 We may share your personal information with our employees, contractors, consultants, advisors and other parties who require such information to assist us with achieving the purposes set out in this policy, including: third parties that provide services to us; third parties that assist SECURE in the provision of services to you; and, third parties who conduct businesses or services on our behalf (e.g., external payroll processing). These third parties may be located outside of Canada or outside of your province of employment, including:
- (a) For example, our service providers may provide certain information technology and data processing services to us from time to time so that we may operate our business, and as result, your personal information may be collected, used, processed, stored or disclosed in the United States of America or such other jurisdiction(s) outside of Canada that may be disclosed to you from time to time. In these circumstances, your personal information may become available to law enforcement, national security, and other authorities under the laws of such foreign jurisdictions.
 - (b) In addition, personal information may be disclosed or transferred to another party during the course of, or completion of, a change in ownership of, or the grant of a security interest in, all or a part of SECURE or its affiliates through, for example, an asset or share sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations, and required to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this privacy policy, unless you consent otherwise.
- 2.8 Where permitted or required by applicable law, we may collect, use, or disclose your personal information without your knowledge or consent.

3. Work Product and Monitoring

- 3.1 The work product of SECURE's employees, whether in paper record, computer files, or in any other storage format belongs to us, and that work product, whether it is stored electronically, on paper or in any other format, and the tools used to generate that work product, are always subject to review and monitoring by SECURE.
- 3.2 In the course of conducting our business, we may monitor employee activities (including internet usage, and e-mail) and our property. This is not meant to suggest that all employees will in fact be monitored or their actions subject to surveillance. It is meant to bring to your attention that such monitoring may occur and may result in the collection of personal information from you. When using SECURE's equipment or resources, employees should not have any expectation of privacy with respect to their use of such equipment or resources. We may monitor our property (or property that is in our custody or control) with cameras that are generally in high risk areas or facility sites, such as at the entrances and exits of the metals recycling facilities and in control rooms where SECURE's IT equipment is located. When in use, surveillance cameras are intended to help protect our employees and third party guests, and to help protect against theft, vandalism and damage to and loss of SECURE's property (or property that is in our custody or control). Generally, recorded images are routinely destroyed and not shared with third parties (unless there is a suspicion of an unauthorized or unlawful act, in which case they may be used in an investigation and/or turned over to the police or other appropriate agency or authority). Should such monitoring occur, it may result in the collection of personal information from you (including your image, likeness or voice).
- 3.3 Additionally, data regarding employee use of company assets may be collected for purposes identified under the Information Technology Acceptable Use Policy through standard tracking technologies and reporting protocols.

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Information collected in this manner may be used by SECURE for the purposes of managing and/or terminating the employment relationship.

4. Procedures

- 4.1 In the event that SECURE needs to collect additional personal information about an employee, use for a purpose not originally anticipated, or disclose personal information to a third party outside the parameters of the initial collection or as set out in this policy, then SECURE may reach out to you to obtain your consent, as required by law.
- 4.2 In some cases, after your employment relationship with SECURE ends, we may be contacted by other organizations and asked to provide a reference for you. It is our policy not to disclose personal information about our employees to other organizations who request references unless we have the employee's consent. The personal information we provide in a reference is a confirmation that an individual was an employee, including the employee's position and date range of employment, and other information permitted or required by law.
- 4.3 SECURE endeavors to protect the personal employee information that is in its possession and control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction.
- 4.4 We may do so by:
 - (a) keeping our records in locked filing cabinets;
 - (b) having up-to-date computer security, including passwords, encryption and firewalls;
 - (c) ensuring that only authorized HR employees have access to the records, either in paper or electronic format; and
 - (d) ensuring that any third parties hired to assist us with providing products and services to our clients, and who require access to personal information, sign a privacy and confidentiality agreement to ensure that this information is likewise protected by them.
- 4.5 In the event that the security of personal information has been compromised, SECURE will endeavor to notify affected employees as soon as possible and initiate all possible steps to mitigate the effects of the breach.
- 4.6 The security of your personal information is important to us, please advise our Privacy Officer immediately of any incident involving the loss of or unauthorized access to or disclosure of personal information that is in our custody or control.
- 4.7 Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. After your employment relationship with SECURE ends, we will retain and securely destroy your personal information in accordance with our record retention policy and applicable laws and regulations.

5. Employee Access to Personal Information

- 5.1 SECURE will, while complying with the applicable regulatory requirements, maintain all required and relevant information relating to employees in the personnel file with Human Resources. Subject to applicable laws, employees may request in writing access to any stored personal data or to their personnel file at any time by contacting their Human Resources Representative who will make the contents available, within a reasonable amount of time, to the employee in the presence of a Human Resources Representative, and subject to applicable laws. Any request to review, verify, or correct personal information must be made in writing and addressed to our Privacy Officer or Human Resources. If you require assistance in preparing your request, please contact our Privacy Officer.

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- 5.2 Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices. In the event that we cannot provide you with access to your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions. For example, SECURE may, subject to applicable law, refuse to provide access to certain information, e.g., information that would reveal personal information about another individual, and may withhold that information and provide you with the remainder of the record.
- 5.3 Employees may make copies of information in their personnel file with the knowledge and consent of the Human Resources Representative.
- 5.4 It is important that the information contained in our records is both accurate and current. If your personal information happens to change, please keep us informed of such changes. In some circumstances we may not agree with your request to change your personal information and will instead append an alternative text to the record in question.
- 5.5 Individuals may also request information about SECURE's use of their own personal information and any disclosure of that information outside our organization. In addition, individuals may request a correction of an error or omission in their own personal information.
- 5.6 When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with your personal information.

6. Consent

- 6.1 Canadian privacy legislation does not generally require SECURE to obtain your consent for the collection, use or disclosure of personal information for the purpose of establishing, managing or terminating your employment relationship. In addition, we may collect, use or disclose your personal information without your knowledge or consent where we are permitted or required by applicable law to do so.
- 6.2 To the extent that your consent is required, we will assume, unless you advise us otherwise, that you have consented to SECURE collecting, using and disclosing your personal information for the purposes stated above (including any other purposes stated or reasonably implied at the time such personal information was provided to us).
- 6.3 Where your consent was required for our collection, use or disclosure of your personal information, you may, at any time, subject to legal or contractual restrictions and reasonable notice, withdraw your consent. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Privacy Officer.

7. Inquiries or Concerns?

- 7.1 If you have any questions about this policy or concerns about how we manage your personal information, including about our policies and practices regarding service providers outside of Canada, please contact a member of the People and Culture team or our Privacy Officer by telephone, in writing or by e-mail. We will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you. If you are dissatisfied with our response, you may be entitled to make a written submission to the Privacy Commissioner in your jurisdiction.

8. Interpretation of this Privacy Policy

- 8.1 Any final judgements of any interpretation associated with this policy will be made by our President & Chief Executive Officer ("**CEO**"), the Chief Financial Officer ("**CFO**"), the Chief Operating Officer (the "**COO**"), and/or the Corporate Secretary. This policy includes examples but is not intended to be restricted in its application to such examples. Where the word 'including' is used, it shall mean 'including without limitation'. This policy does

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not create or confer upon any individual any rights, or impose upon SECURE, any rights or obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this policy and Canada's federal and provincial privacy laws, as applicable, this policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.

9. Approval

9.1 Adopted by the Board on December 9, 2009. Last reviewed and/or amended on October 29, 2025.