



Guide to Business Ethics and Conduct

Revised January 2013

As an US Ecology (the “Company”) employee you should know where the Company stands on basic ethical issues and conduct. This Guide was prepared to provide you a formal statement and framework of our Company's commitment to the highest standards of ethical business conduct. You are expected to review this Guide and comply with it.

Situations that are not specifically addressed by this Guide or covered in the Employee Handbook should be addressed with your manager, Human Resource representative, or as appropriate, senior management of the Company. **It is expected that you conduct yourself with the highest professional and personal ethical standards at all times.**

- Company assets are to be used solely for valid business purposes.
- Company business must be conducted in compliance with all Company policies, as well as all applicable laws, rules and regulations at all federal, state and local levels of government.
- Confidential business information is not to be disclosed to or discussed with co-workers, friends, associates, former employees, customers or vendors who do not have a business reason to possess such information, except in accordance with established Company policies and procedures.
- Conflicts of interest (in-fact or in-appearance) with employees, vendors or customers that may influence work decisions or actions must be avoided. Conflicts of interest may be both financial and non-financial related.
- Secondary employment must be disclosed and approved by senior management.
- Using your position in the Company to benefit you, your family or friends or to create situations that have a negative impact on the Company is prohibited.
- You or any member of your family may not accept gifts of money under any circumstances, nor may you solicit non-monetary gifts, gratuities, favors, or seek any other personal benefit of any kind from suppliers or customers. Unsolicited, non-monetary gifts from a business firm or individual doing or seeking to do business with US Ecology is acceptable only if:
 - (1) The gift is of nominal value; or (2) the gift is primarily of an advertising or promotional nature. Gifts of more than nominal value must be reported to your manager, senior management, or Human Resource representative.
- Contracts and agreements binding the Company must 1) only be signed by company officers or their written designees 2) be in writing on Company-approved format and 3) clearly and accurately set

forth the services to be performed with the applicable rate or fee for such services.

- Payments of any kind, other than those included in contractual arrangements of the Company, may not be made to or received from customers, suppliers or prospective customers or suppliers.
- No fraudulent, false or artificial entries shall be made in any of the books or records of the Company, including expense reports and timesheets, or in any public record, for any reason, nor should entries in the Company's records be altered in any way without documented approval.
- Disposal or destruction of Company records and files outside of the Company's record retention policy is prohibited. In no event shall an employee destroy records to avoid disclosure in a legal proceeding and doing so may constitute a criminal offense.
- Harassment or discrimination against any person will not be tolerated.
- The use of intoxicating, addictive or illegal drugs during work hours is strictly prohibited. Use of prescription drugs that may impair job performance, or endanger the health or safety of other employees must be reported.
- Reprisal against any employee or other person who in good faith reports suspected violation of this or any Company policy is not permitted.
- Managers are responsible for ensuring the appropriate and ethical conduct of their subordinates and ensuring compliance with all Company policies. Managers are responsible for reporting and investigating, with consultation from the Company's Legal or Human Resources departments, alleged violations of the ethical conduct policy.

Failure to adhere to this Guide or any Company policy may result in disciplinary action, up to and including termination of employment.

Jeffrey R. Feeler
Acting President and Chief Operating Officer