

GFL | CORPORATE ENVIRONMENTAL MANAGEMENT SYSTEM (EMS) FRAMEWORK



In order to consistently monitor and ensure environmental compliance and issues management across our operations, GFL has developed and implemented a corporate Environmental Management System (EMS) based upon the principles of the U.S. Environmental Protection Agencies Compliance Focused EMS. The framework for GFL's EMS is modelled after ISO 14001. The foundation of the EMS is GFL's **Environmental Policy**. GFL's corporate EMS framework, its key elements and system standards are provided below.

Our EMS framework has been developed at the corporate level, and is executed at the business line, facility and regional levels through well-defined roles, responsibilities and accountabilities. Each business line may develop and adopt its own tailored system requirements, provided they meet, at a minimum the corporate EMS framework.

As well as the responsibility and accountability for compliance with regulatory requirements residing with operations, our corporate EMS has a defined role for subject matter experts. Subject matter experts provide visible leadership and have responsibility for contributing to, and communicating environmental policy, regulatory guidelines and best management practices in their defined subject areas of expertise. They also assist our business lines in identifying and interpreting regulatory requirements and support our corporate action plan for sustainability, including achieving our corporate sustainability goals that will be announced in our 2021 Sustainability Report (to be released in 2022).

The day-to-day performance of our corporate EMS is monitored on a regular basis by the Vice President, EHS and Compliance as well as the EHS Directors for each business line. Monitoring is conducted using an electronic information management system, as well as through compliance audits of operations. An independent audit of each business units' compliance with the corporate EMS is conducted at least once every three years. This independent audit program is overseen by the Vice President of Environmental Responsibility and Sustainability.

Reporting and communication of GFL's EMS is provided to the Nomination Governance and Compensation (NGC) Committee of the Board through the Sustainability Initiatives Committee (SUSIC) on a regular basis.



System Element and Purpose

System Standards

1. ENVIRONMENTAL POLICY

To clearly state GFL's intention, commitment, and principles in relation to the environment so that they are understood throughout GFL's operations.

- Policy is established, maintained, and signed by the President
- Policy is formally reviewed annually and revised, as needed
- Policy:
 - accurately reflects the commitments and views of senior management regarding expected environmental performance
 - is appropriate to the nature, scale, and impacts of activities, products, and services
 - includes a commitment to continual improvement of the environmental management system to enhance environmental performance
 - provides a framework for setting and reviewing objectives and targets
 - includes a commitment to comply with relevant environmental legislation and regulations and a commitment to fulfill our compliance obligations
 - includes a commitment to the protection of the environment, including prevention of pollution
- Policy is:
 - maintained as a controlled document
 - communicated throughout GFL
 - available to interested parties
 - Included in employee onboarding package
- An individual business unit can adopt GFL's Corporate Environmental Policy or develop a business unit level Environmental Policy that is consistent with GFL's Corporate Environmental Policy

2. UNDERSTANDING LEGAL AND OTHER REQUIREMENTS

To ensure that each operation has a complete understanding of applicable legislation, regulations, permit and other requirements, and that these are communicated throughout GFL to those employees who have responsibilities for compliance.

- Applicable legal/regulatory requirements including permit requirements are appropriately identified, assessed, interpreted, and applied
- Organizational roles and responsibilities for identifying and interpreting applicable legal/regulatory requirements are clearly defined and widely understood
- Identified employees have been assigned specific responsibility for determining which legislation, regulations, codes of practice, permit requirements, industry standards have applicability to the operation or facility
- Applicable legal/regulatory requirements are communicated to appropriate managers and employees
- Proposed new/modified environmental legal and regulatory developments are identified, tracked, and assessed to determine their applicability to, and potential impacts on, GFL's business operations
- Relationships with key regulators are established and maintained
- Material permits and approvals are monitored and maintained at a corporate level

System Element and Purpose

System Standards

3. UNDERSTANDING KEY ENVIRONMENTAL ISSUES

To clearly state GFL's intention, commitment, and principles in relation to the environment so that they are understood throughout GFL's operations.

- Emerging issues are identified for all operations and activities
- Key stakeholders are identified for all new or expanded operations and activities
- Senior and operating management are aware of key environmental issues that could significantly affect their business area
- Processes for understanding the environmental risks inherent in operations and projects (up to and including emergency preparedness and response) and for identifying and implementing actions to eliminate or reduce those risks are in place
- Changes to operations include an assessment of impacts of the environmental risks associated with the design and construction and/or alteration of new and/or expanded facilities and any changes to facility equipment, controls, or operating procedures
- Acquisitions are subject to appropriate due diligence assessment
- Key environmental assets inventory is monitored and maintained.

4. ROLES AND RESPONSIBILITIES, ORGANIZATION AND RESOURCES

To establish an organizational structure with clear environmental roles and responsibilities and suitable resources.

- Appropriate resources are provided to:
 - proactively identify and manage environmental issues
 - provide oversight and technical assistance on new projects, impact assessments, permit renewals, and site remediation activity
 - monitor and maintain compliance with environmental regulatory requirements
 - establish relationships/negotiate with regulators
 - conduct root cause analysis of deficiencies
 - lead and track environmental programs/action plans
- Documented responsibilities exist for key positions with environmental roles
- Operating personnel understand and accept their roles and responsibility for environmental management

5. GOALS AND OBJECTIVES

To establish goals and objectives to drive continuous improvement in environmental performance.

- Measurable goals and objectives once developed in conjunction with operations are shared throughout GFL, these include key performance indicators identified by senior management
- Each goal and objective is assigned to a responsible employee(s) who ensures that programs/action plans are in place to achieve them, and who tracks and reports on progress.

System Element and Purpose

System Standards

6. RECORD KEEPING AND DOCUMENT CONTROL (ENVIRONMENTAL INFORMATION MANAGEMENT)

To maintain documents and records relating to the management of environmental issues so that they are current, accessible, and compliant with regulatory requirements relating to documentation.

- Current version of documents are available and in use; obsolete documents are removed from use, and, superseded documents are archived
- Records are kept for the legally required length of time
- Records are maintained in a secure location and are easily accessible to the appropriate people
- Location and accessibility requirements are communicated to appropriate personnel
- Controlled documents and key records are maintained in an electronic data management system
- Process for control of documents is maintained

7. OPERATIONAL CONTROL PROCEDURES

To ensure that environmental issues are managed and that documented operational procedures are established and maintained for key activities.

- Documented operational procedures are established and maintained for activities with key environmental issues/aspects and are readily available to applicable employees
- Employees are trained on content and application of operational procedures
- Employees are actively engaged in the management of environmental issues
- Key environmental assets are appropriately managed

8. TRAINING AND AWARENESS

To equip employees with the knowledge and skills to conduct their assigned work safely and with an awareness of the environmental (including regulatory) aspects of their work.

- Process for identifying employees' training needs and responsibilities is in place
- Training programs are developed and updated, as required
- Employees receive the training identified, as required
- Records of training provided to employees and contractors are maintained
- Refresher training is provided, as required
- Process for tracking compliance with environmental (including regulatory) training requirements and responsibilities for this are clearly defined

System Element and Purpose

System Standards

9. EMERGENCY PREPAREDNESS

To provide assurance and maintain compliance with regulatory and other requirements.

- Foreseeable emergency situations associated with the operations and activities are identified for normal operating conditions, maintenance and upset conditions
- Appropriate preventative and mitigative controls are put in place
- Emergency equipment is available, inspected/tested, and maintained
- Emergency preparedness and response plans are available, communicated to employees and key stakeholders (i.e., emergency responders, neighbors, etc.)
- Training is conducted for emergency response

10. PERFORMANCE EVALUATION

To provide assurance and maintain compliance with regulatory and other requirements.

- Regular, on-going inspections are carried out in a systematic, formalized manner, using checklists, inspection protocols or other tools
- Monitoring of environmental indicators is conducted using industry standard practices
- Deficiencies are addressed
- Root cause analysis of material deficiencies and identification, and tracking of corrective actions are conducted
- Records of inspections, maintenance, and monitoring are maintained
- Compliance with regulatory requirements is operationalized and tracked
- Independent audit program of:
 - conformance of business unit environmental management systems with corporate environmental management system is conducted for each business unit at least once every three years

11. INCIDENT REPORTING & INVESTIGATIONS

To provide assurance and maintain compliance with regulatory and other requirements.

- Process to report, record and escalate incidents and complaints is defined
- All material incidents and complaints are reported, recorded, escalated and investigated
- Employees receive training on recognizing, reporting, and recording incidents and complaints
- Root cause analysis of material incidents is conducted and corrective actions are identified and tracked
- External stakeholders (regulatory agencies, legal, insurance, property owners, public) are notified, as appropriate

System Element and Purpose

System Standards

12. REPORTING AND COMMUNICATION

To ensure timely and consistent reporting of existing or emerging issues to appropriate levels of management, regulators, and other key external stakeholders and to facilitate management review of effectiveness and continuous improvement of the environmental management system.

- Elements of the environmental management system are reported annually or as prescribed in the framework
- Regulatory communication is conducted in a timely manner
- Internal reporting to senior management includes but is not limited to:
 - progress towards attainment of corporate goals and objectives
 - critical non-compliance/deficiencies are noted, and corrective actions taken resulting from audits (internal/external) and monitoring/inspections
 - significant regulatory activity (changes to regulations, permit renewal, etc.)
 - environmental resources required
 - critical incidents and complaints
- Consultation and communication occurs with key external stakeholders, including community liaison committee, where applicable
- Employees are actively engaged in identifying and reporting on opportunities for improvement