



SUPPLIER CODE OF CONDUCT

At GFL Environmental Inc. and its subsidiary and affiliated companies, our vision is to be Green For Life and we believe that our employees are our greatest asset. As such, GFL is built on a commitment to treating all workers with respect and dignity, ensuring safe working conditions, and conducting environmentally responsible and ethical operations. We strive to work with suppliers who demonstrate a similar commitment to their employees through the implementation of proactive health and safety practices, and who demonstrate environmental stewardship by embracing sustainable practices aimed at minimizing their environmental impact. We expect our suppliers in the GFL supply chain, and their downstream suppliers, to comply with this Code of Conduct, hold to our same high standards, and embrace the following social, environmental, and ethical responsibilities.

Supplier Conformance with GFL's Supplier Code of Conduct

- **Underlying Obligations.** In addition to the responsibilities below, suppliers must comply with all applicable laws, legal regulations, and legally binding directives, and guidelines; and all obligations in any contract a supplier may have with us.
- **On-Site Work.** Suppliers using our properties or facilities or accessing our customers' sites as our subcontractors will comply with all applicable policies and requirements that we will provide to you.
- **Shared Commitment and Cooperation.** Suppliers will cooperate with any information requests or audits we may initiate to confirm their fulfillment of these responsibilities.
- **Continuous Improvement.** The Supplier responsibilities outlined in this Code of Conduct reflect the minimum standards expected. GFL expects suppliers to endeavor to exceed both international and industry best practices.

Labor and Human Rights

GFL is committed to upholding the human rights of workers and treating them with dignity and respect. As a result, suppliers must manage their own workforce to achieve the following results:

- **Freely Chosen Employment.** All work must be voluntary, and all workers must be free to terminate their employment on reasonable notice. Forced labor, human trafficking, and modern slavery are strictly prohibited. Suppliers must comply with all applicable local and international laws related to these areas. We expect all suppliers to have robust processes in place to eliminate the risk of modern slavery occurring in their organizations.
- **Fair Wages, Benefits, and Working Hours.** Suppliers will provide employees with all legally mandated wages and benefits in compliance with applicable laws regarding deductions from wages. Suppliers must also comply with all applicable overtime, rest periods, and maximum working hours rules. Though we seek to work with suppliers to improve conditions, we may terminate our relationship with any supplier that fails to meet these responsibilities.

- **Young Workers.** Suppliers will not use child labor and must not employ individuals in violation of any applicable minimum age laws or regulations. The employment of workers below the age of majority as defined and permitted by applicable local law shall not be permitted in hazardous conditions and should only be permitted with the appropriate training in advance of commencing employment.
- **Employee Grievances.** Suppliers are expected to permit workers to openly communicate and share grievances with management about working conditions without fear of reprisal or harassment.
- **No Discrimination or Harassment.** Suppliers are expected to provide a professional and inclusive atmosphere for employees, free of harassment, which promotes equal opportunities and prohibits discriminatory practices.

Health and Safety

GFL's highest focus is always on the health and safety of our employees. We expect the same from our Suppliers. Suppliers are expected to abide by the following health and safety management requirements:

- **Occupational Safety and Health.** Suppliers will implement procedures to prevent, manage, track, and report occupational injury and illness. Suppliers will ensure they have proper emergency preparedness plans and that workers are properly trained for such contingencies.
- **Proper Equipment.** Workers will have access to the appropriate equipment and materials to conduct their work safely.
- **Workplace Environment.** Suppliers will take proactive measures to maintain a safe, clean, healthy, and productive environment for their employees in compliance all applicable environmental, safety, and health regulations and through management systems that are aligned with internationally recognized standards.

Environmental

GFL's core expertise is providing environmentally sound solutions to some of the largest companies and municipalities in North America, where it conducts its operations. Suppliers will strive to create sustainable processes and will commit to being forward-thinking and environmentally responsible in all their business activities, including complying with all applicable environmental laws and regulations. In addition:

- **Environmental Permits and Reporting.** Suppliers will obtain and keep current all required environmental permits, approvals, and registrations, and follow the operational and reporting requirements of such permits, etc. and on request, provide GFL with copies of such permits, etc.
- **Resource Efficiency, Clean Energy and Climate Leadership.** Throughout their operations, suppliers will work to reduce the consumption of resources, including raw materials, energy, and water. They will implement reuse and recycling practices aimed at reducing and eliminating waste. Suppliers will be committed to the reduction of energy consumption, greenhouse gas emissions, as well as other emissions into the atmosphere, water, and soil. They shall actively explore avenues to enhance energy efficiency and transition to clean energy sources. Additionally, Suppliers shall take diligent measures to mitigate, restore, or offset any impacts when operating in proximity to critical biodiversity areas.
- **Waste, Wastewater, and Stormwater Management.** Suppliers will manage and control all waste streams to comply with applicable laws and regulations and in an environmentally responsible and secure way.
- **Hazardous Materials.** Suppliers must handle and dispose of hazardous materials in accordance with applicable laws and regulations.

Ethics

GFL is committed to conducting its business free from unlawful, unethical, or fraudulent activity. Suppliers will uphold the highest standards of ethics to promote honesty and integrity in business operations and act in a manner consistent with ethical and professional standards including:

- **Business Integrity.** Suppliers will avoid even the appearance of conflicts of interest in their work with us, and must not engage in any form of bribery, fraud, extortion, collusion, embezzlement, money laundering or other corrupt practices. Suppliers will accurately reflect their business dealings in their books and records. Suppliers will implement monitoring and enforcement procedures to ensure compliance with anti-corruption and anti-bribery laws.
- **Privacy and Information Security.** Suppliers will protect the privacy of personal information of everyone with whom they do business, including suppliers, customers, consumers, and workers.
- **Cybersecurity.** Suppliers will implement privacy and security policies that comply with all applicable obligations, laws, and regulations regarding the collection, use, transfer, storage, protection, disposal or disclosure of personally identifiable information or any other similarly regulated information collected.
- **Fair Competition.** Suppliers will conduct business in accordance with fair competition laws and must not participate in price fixing, bid rigging, or other anti-competitive practices.
- **Gifts & Hospitality.** GFL limits its employees' ability to accept gifts and hospitality. Suppliers are expected to not offer any gifts or hospitality such as cash payments, gratuities, privileges, or other personal rewards, which are intended to influence activities or affairs to facilitate business. As a matter of general and accepted business practice, gift exchanges are acceptable only if they are of reasonable, modest, and symbolic value, occasional, transparent, and not leveraged as negotiable instruments in the business relationship.

Compliance & Monitoring

Suppliers will take all reasonable steps to monitor their own compliance with this code of conduct and to diligently correct identified instances of non-compliance. GFL reserves the right to audit this compliance at any time, and to request records, documents, and other information to verify the Supplier's commitment to, and compliance with, this code of conduct including a self-assessment questionnaire.

- **Reporting Violations.** Suppliers must promptly report any known or suspected violations of this Code to GFL through the designated reporting channels.
- **Remediation.** In the event of a violation, suppliers must work to promptly develop and implement corrective action plans to remedy any material non-conformance.

References

The following documents were reviewed in the creation of this policy:

1. Responsible Business Alliance Code of Conduct (previously known as the Electronic Industry Citizenship Coalition)
2. United Nations Guiding Principles on Business and Human Rights
3. Universal Declaration of Human Rights
4. United Nations Global Compact
5. International Labour Organization (ILO) standards
6. Organization for Economic Co-operation and Development (OECD) Guidelines

Dated: February 7, 2024

Approved by: Board of Directors of the Company